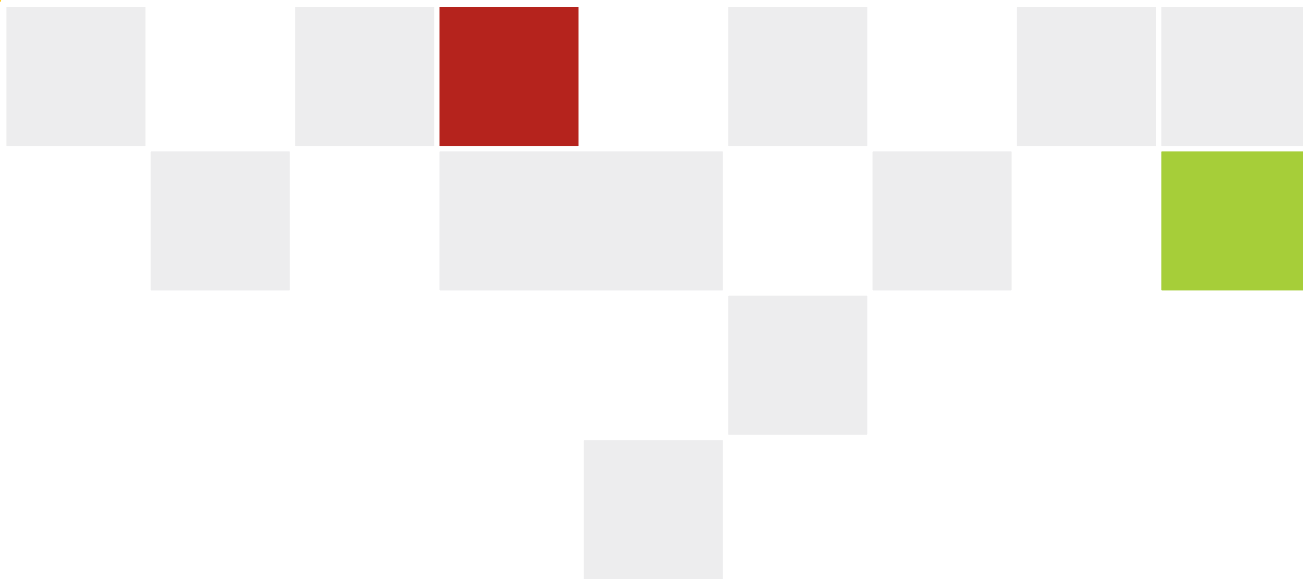


# Guildford Borough Local Plan - Strategy & Sites



Statement in Response to Matters & Issues for Examination



**Boyer**

## Report Control

Project:	Land at Send Marsh Guildford Borough
Client:	Trenfold Property Ltd and Countryside Properties
Reference:	06.190
File Origin:	Y:\Pre-Sharepoint Project Folders\06.190 Sendmarsh (do not archive DP)\Representations\EIP\180510 Guildford Local Plan EIP Statement Final.docx
Primary Author	Mike Newton
Checked By:	Mike Newton

<i>Issue</i>	<i>Date</i>	<i>Status</i>	<i>Checked By</i>
1	9 May 2018	Draft	MN
2	10 May 2018	Final	MN

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## **INTRODUCTION**

- 1 This statement has been prepared by Boyer on behalf of Countryside Properties in response to the Inspector's Matters and Issues for the examination of the submitted Guildford Local Plan.
- 2 This statement relates to Matter 4: "Housing Trajectory", Matter 5: "Five Year Housing Land Supply" and Matter 9: "Spatial Strategy, Green Belt and Countryside Protection".

## **MATTER 4: HOUSING TRAJECTORY**

**Is the plan's housing trajectory, which starts at a low level and rises towards the later years of the Plan period, a sound basis for meeting housing need? Relevant topics include:**

**4.1 The ability or otherwise of increasing the rate of delivery in the early years.**

**4.2 Whether the housing trajectory is realistic and deliverable, and whether there are any identifiable threats to delivery.**

**4.3 The key infrastructure improvements influencing the housing trajectory.**

### **Introduction**

- 3 There is no clear logic to the way in which the Council has derived a stepped housing requirement in Policy S2 from its overall housing requirement which is 12,436 homes over a 19 year period at 654 completions per annum.
- 4 We acknowledge that a stepped housing requirement could, in certain circumstances, be acceptable. However, it is difficult to understand how the Council has derived the stepped target in Policy S2 and it bears little relation to the projected completions in the housing trajectory. In its current form, the expression of the target in the policy is incoherent and ineffective, and therefore unsound.
- 5 The key issues and concerns are:
  - The plan sets a proposed stepped target that begins in the fifth year of the Plan period (2019 /20) with 450 completions in that year, rising to 850 completions in the final year (2033 /34). This target would deliver only 9,810 dwellings over this 15 year period
  - Together with actual and projected completions in the first 4 years of the Plan (which number 1,335) this stepped target only delivers 11,145 dwellings over the full Plan period, a shortfall of 1,281 against the Plan's housing target of 12,426.
  - The stepped target in the policy is below the required average rate of provision (654 completions per annum) for the first eleven years of the Plan period, only rising above this level in 2026/7
  - It is not sound to set out a housing target that does not deliver the Plan's housing requirement and takes more than half the Plan period to reach the required level of provision
- 6 The Council's proposed stepped target as set out in Policy S2 does not therefore deliver the Plan's housing requirement and proposes a below average rate of housing provision for half the Plan period.

- 7 For these reasons, the target set out in tabular form in Policy S2 is unsound and should be deleted. If the Council is to establish a stepped requirement this must be based more closely upon the housing trajectory as considered below.
- 8 The role of the housing trajectory is to set out how the housing target is to be achieved. It could not be expected that the Plan will deliver 654 completions in each and every year of the Plan and some variation in completion rates is to be expected. However, there are three important requirements upon the trajectory
- That variations in annual provision are within parameters that will not put at question the achievement of the overall target
  - That the Plan provides a sound basis for an ongoing 5 year supply of deliverable sites
  - That under-provision in the early years of the Plan is made up in the rest of the Plan period and as soon as possible
- 9 If the Council is proposing stepped housing provision it must still, as far as possible, meet these three requirements.

#### **Q4.1 The ability or otherwise to increase the rate of delivery in the early years.**

- 10 There is scope to increase provision in the early years and previous consultation stages of the Plan demonstrate this potential.

#### Smaller Non-Strategic Green Belt Sites

- 11 We consider that the methodology for the Green Belt review process is flawed and, in consequence, has failed to identify smaller sites adjoining the inset villages that make a weak contribution to Green Belt purposes, do not contribute to the openness of the Green Belt and are, in one or two instances, effectively contained within the village envelope.
- 12 This is an important consideration in the context of a Plan that is over-dependent upon large strategic Green Belt releases to meet its housing requirement and we suggest that the Council be invited to revisit the potential of smaller sites where evidence submitted by promoters shows no or minimal contribution to Green Belt purposes. We consider this matter further under Matter 9 below.

#### Inset Villages

- 13 The inset villages are third in the spatial hierarchy of sustainable locations for development and therefore scope for development at these villages must be considered before the Guildford urban extensions and new settlement at Wisley. This potential has not been given due and proper consideration.

- 14 In accordance with NPPF para 86, the Plan proposes to inset a number of villages from the Green Belt that do not have an open character or otherwise contribute to the openness of the Green Belt. As part of this process, in the first Regulation 19 consultation (June 2016), the Council identified an opportunity to revise the settlement boundaries to include small parcels of additional land within each village inset area that would not harm the Green Belt or the character of each village. As a result, limited areas were identified for development at Send Marsh, West and East Horsley, Normandy and Flexford and Ripley.
- 15 The previous Regulation 19 Plan was therefore able to identify small scale additional development areas that are very much needed to increase the rate of housing delivery in the early years of the Plan. These additional areas were deleted from the Submission draft of the Plan without clear reason or justification.
- 16 The insetting of villages from the Green Belt alters Green Belt boundaries and this requires the Council to comply with the guidance in NPPF paragraph 85 which states: *“When defining boundaries, local planning authorities should”* (inter alia) *“not include land which it is unnecessary to keep permanently open”*. The current submission draft of the Plan does not appear to have complied with this requirement.
- 17 We consider the Council should be asked to reconsider the specific boundary adjustments that were previously proposed and include these within the current Plan. This is a tangible and direct means of increasing provision on small sites which can be delivered rapidly in the early years of the Plan.
- 18 A clear example of this potential is the inclusion of a small area of land contained by existing development on three sides and within the village envelope of Send Marsh, proposed in the June 2016 plan but now withdrawn. This indicates the potential that can be identified in the Inset Villages. We give this general issue further consideration under Matter 9, Q9.6 below.

#### Safeguarding

- 19 The July 2014 Plan proposed to safeguard land to meet longer term development needs. Paragraph 4.115 of this version of the Plan states:
- “We have identified safeguarded land at Fairlands, Send Marsh, Normandy and Flexford, as set out in Site Allocations 118-120 and 123. This land will also ensure that we have the flexibility to meet our current development needs should any of our strategic sites not come forward as envisaged over the plan period.”*
- 20 This indicates that land that is suitable for Green Belt release and development was identified in the previous July 2014 version of the Plan for the specific purpose of guarding against strategic sites not coming forward as envisaged. This provision was deleted in the final submission version of the Plan without clear reason.

- 21 We consider the Council should be asked to re-consider the potential of these sites which are smaller in scale than the strategic allocations and would provide greater diversity and deliverability with the Plan's housing supply, either as additional full or reserve allocations / safeguarded land.

**Q4.2 Whether the housing trajectory is realistic and deliverable, and whether there are any identifiable threats to delivery.**

- 22 The Council's Housing Trajectory shows the following actual and projected completions for the Plan period as follows:

Year	Actual Completions	Year	Projected Completions
2015/16	387	2025/26	871
2016/17	294	26/27	870
	<b>Projected Completions</b>	27/28	919
2017/18	306	28/29	919
18/19	348	29/30	949
19/20	572	30/31	947
20/21	769	31/32	947
21/22	829	32/33	946
22/23	675	33/34	945
23/24	824	<b>Total</b>	<b>14,191</b>
24/25	874		

- 23 This is a stepped trajectory which in theory delivers more housing than the Plan's overall requirement. It is clear from this trajectory that housing provision has been at a low level for the first two years of the Plan period and this low rate is sustained in projected completions for the years 2017 /18 and 2018 /19. Projected completions rise in 2019 /20 but are still below the average requirement and this means the Plan underprovides for housing significantly over the first 5 years of the Plan period (providing 1,363 homes less than the per annum requirement).
- 24 The trajectory then indicates a very rapid increase in per annum completions to levels that exceed the average per annum requirement and, if achieved, would begin to redress the shortfall in the early years. However, we doubt that this significant uplift could or would be achieved and this is a serious concern against the soundness of the Plan.
- 25 This slow rate of delivery in the trajectory is a consequence of the structure and characteristics of the Plan's housing supply, in particular a reliance on a small number of large sites with major infrastructure requirements and uncertainties about when these sites will become available.



- 26 The Plan proposes five major development sites /areas at Slyfield, Ash and Tongham, Gosden Hill, Blackwall Farm and the Wisley new settlement which all exceed 1,000 dwellings capacity and total 7,325 dwellings. These sites account for 59% of the total housing requirement and 74% of the residual requirement (after taking account of completions and permissions).
- 27 Of these five sites, the earliest delivery is at Ash and Tongham where first completions are indicated in 2021 /22. First completions at Gosden Hill, Blackwall Farm and the Wisley new settlement are not until 2022 /23 and the Slyfield regeneration area does not generate completions until 2024 /25.
- 28 Even if taken at face value, this pattern of housing delivery will result in shortfalls in housing completions for the first six years of the Plan.
- 29 It is striking that the five sites referred to above are expected to deliver 3,856 completions (53% of their total capacity) in the last five years of the Plan.
- 30 In the Plan's final year of 2033 /34 these five sites are expected to deliver 771 dwellings
- 31 It is very clear from these figures that any delay will result in a significant shortfall against the Plan's housing target. This is a substantial risk given the significant infrastructure requirements at Wisley, Gosden Hill and Blackwall Farm and the remediation works required at Slyfield in particular.
- 32 The Sustainability Appraisal highlights this issue and notes that the Council's preferred approach results in *"an increased reliance on larger sites and hence there would be a likelihood of undersupply within the early part of the plan period."*
- 33 In addition the SA acknowledges that the *"high reliance on large ('strategic') sites results in a risk that one or more sites will deliver slower than anticipated (or, indeed, not deliver at all in the plan period)"*.
- 34 This is compounded by the fact that a number of the larger sites allocated within the Local Plan are also reliant on the delivery of significant infrastructure which in turn may also result in additional delays or a lack of housing delivery.
- 35 This is highlighted in the Duty to Cooperate Topic Paper which states in paragraph 4.45 that *"...the delivery of former Wisley airfield, Gosden Hill and Blackwell Farm is dependent upon the delivery and timing of key infrastructure requirements on the A3. This is reflected in the expected phasing of the sites, with the majority of provision anticipated post 2027"*
- 36 There is therefore a very clear need to diversify the Plan's housing supply by identifying additional sites, drawing in particular on options considered at earlier consultation stages, as proposed in our response to Q4.1 above.

## **5. MATTER 5 - FIVE YEAR HOUSING LAND SUPPLY**

**5.1 Is the methodological basis for calculating the 5 year housing land supply sound? (The Council's calculations are based on a 20% buffer, the Liverpool methodology and a rising trajectory – see 3.50 of the Council's response to initial questions.)**

**5.2 How many years' supply of deliverable housing land exist at present, having regard to the housing trajectory, the current supply position, and the plan's housing allocations?**

**5.3 Is the plan resilient and flexible enough to maintain 5 or more years' supply of deliverable housing land going forward? (See Appendix 7 of the Housing Delivery topic paper).**

### **Q5.1 Is the methodological basis for calculating the 5 year housing land supply sound?**

37 The Council's position appears to be one of seeking a departure from the recognised and established basis for setting the 5 year requirement against which a 5 year supply assessment is made. In principle, it is proposing that the five year requirement not be based on an annual average of the total requirement (654 completions p.a.) but on a stepped requirement that reflects the Plan's low rate of provision in its early years.

38 Essentially, the Council is seeking to apply the provisions set out in draft Planning Practice Guidance (PPG) on page 17 of the consultation document which states:

*“Where plan makers have reflected the plan trajectory with stepped rather than average annual requirements, the five year land supply will be measured against the specific stepped requirements for the particular five year period.”*

39 However, the draft PPG makes it clear that *“Stepped trajectories will need to ensure that plan requirements are met fully within the plan period.”* For the reasons set out above in dealing with the Plan's housing trajectory, we know that the stepped housing target set out in Policy S2 of the Plan will not deliver the Plan's housing requirement and has no clear foundation or justification.

40 We consider that a stepped basis for calculating the 5 year requirement could only be based on the projected rate of completions shown in the trajectory and only if there is confidence that the low rate of housing provision in the early years of the Plan can be made up in later years and does not jeopardise the Plan's housing requirement being fully met within the Plan period. For the reasons set out in our analysis of the housing trajectory under Matter 4 above, we do not consider that the Plan housing trajectory meets these requirements.

41 There is a danger that the adoption of a stepped housing target for the purposes of calculating the Council's five year housing requirement will legitimise a fundamentally flawed Plan trajectory and weak housing supply position.

42 The purpose of the requirement to maintain a five year land supply, as set out in the NPPF, is to ensure sufficient progress is made in the delivery of a Plan's housing requirement and, in simple terms, to ensure that critical housing needs are met at the earliest possible date. It is vital that the Plan's stepped housing trajectory does not allow it to avoid the discipline and purpose of the NPPF's 5 year land requirement provisions.

**Q5.2 How many years' supply of deliverable housing land exist at present**

43 It is not possible to judge how many years supply of deliverable housing land exist at present without first resolving the issues surrounding the methodology, considered above.

44 It is clear from Appendices 5 and 6 of the Council's Housing Delivery Topic Paper (December 2017) that the Plan will not provide a 5 year land supply under either the "Liverpool Method" or "Sedgefield" Method. This is due, fundamentally, to the structure of the Plan's housing supply which relies on strategic sites with first completions well into the Plan period and delivery skewed heavily towards the end of the Plan period (as set out in the section of this statement above that deals with the housing trajectory).

45 There is therefore no doubt that under any established methodology for assessing 5 year land supply, within the terms set out in the current NPPF, there is an insufficient supply.

46 The Council can only demonstrate that the Plan provides a rolling 5 year land supply by changing the methodology to adopt a stepped housing requirement in combination with the Liverpool Method. As indicated above, its approach to this, as set out in the Topic Paper on Housing Delivery and in the Council's response to the Inspector's questions, is incoherent and unsound.

**Q5.3 Is the plan resilient and flexible enough to maintain 5 or more years' supply of deliverable housing land going forward?**

47 The extent of the step up in housing provision shown in the Plan's trajectory is untenable and action must be taken to increase the allocation of small sites and promote early delivery (as we have proposed in our response to Matter 4 above) if a stepped requirement is to be justified and effective.

48 The Plan is not resilient or flexible in relation to the 5 year land supply issue. There is a need to fill a gap in the early years of the plan period with a greater number of smaller sites where there is certainty that they can and will be delivered in the first five years of the plan period. This will ensure diversity of supply and ensure the plan accords with the requirements of paragraph 47 of the NPPF.

49 To address this issue, the Council should be asked to re-consider smaller sites that it has previously proposed for allocation or as safeguarded land and those which are clearly available for development.

- 50 As a minimum, the Plan requires direct action to diversify its portfolio of sites and introduce more land that can be delivered quickly to ensure a five year land supply. It also requires contingency measures to increase housing supply in the event that larger strategic sites fail to deliver in accordance with the trajectory, including the provision of safeguarded land and reserve sites.
- 51 Sites identified as safeguarded land in previous consultations and additional land inset from the Green Belt as part of the inset villages, are essential options to address this issue.

## **9. SPATIAL STRATEGY, GREEN BELT AND COUNTRYSIDE PROTECTION**

This is a section on the soundness of the spatial strategy and the overall approach to Green Belt and the countryside. Site-specific matters, including local Green Belt and landscape issues, will be dealt with separately in relation to the individual sites.

**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?**

**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.

**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.)

**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?**

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

**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?**

52 Our response to this Matter focuses on Questions 9.4, 9.5, 9.6 and 9.8.

#### **Q9.4 Striking the right balance between the use of previously developed land and urban extensions?**

- 53 The broad approach to removing major previously developed sites from the Green Belt, as set out in paras 4.3.14 and 4.3.15 of the Plan, accords with national planning policy and is supported.
- 54 However, land with PDL status should be a factor in the consideration of other sites for release from the Green Belt (together with their contribution to Green Belt purposes and to the openness of the Green Belt). We consider that the Plan in focussing on major PDL sites has neglected the potential of such sites.
- 55 A wider consideration of the potential for PDL sites in the Green Belt to contribute to meeting the housing requirement (particularly the need for smaller deliverable sites) is necessary to demonstrate that the Plan addresses the Inspector's question 9.4 and strikes *"the right balance between the use of urban and previously developed land and urban extensions"*
- 56 This would also be in accordance with paragraph 4.38 of the Housing Delivery Topic Paper which states *"our spatial hierarchy identifies a brownfield first policy including, where appropriate, previously developed land in the Green Belt."*
- 57 The Plan evidence base has not sought to specifically identify and assess PDL within the Green Belt and this is a significant omission. There are no details as to the methodology or reasoned justification that has been applied to demonstrate that a site should be considered as previously developed land and it is clear that the Council's claim that it has adopted a brownfield first policy is untrue.
- 58 The provisions of the draft revisions to the NPPF will make it a requirement to identify and assess PDL, notably paragraph 137 which states 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."*
- 59 Given the need to identify smaller deliverable sites to address the shortfall in housing provision in the early years of the Plan, this forthcoming requirement should be considered in the context of this Examination.
- 60 Paragraph 4.92 of the Topic paper on Housing Delivery states *"If major previously developed sites are of sufficient scale and do not possess an open character, it is not considered necessary for them to remain within the Green Belt."* We consider that given the pressing need to identify smaller and more deliverable sites, this provision should not be constrained to sites of *"sufficient scale"*. It is not clear how this limitation is defined and it could rule out land which should be considered to provide a more balanced and deliverable housing supply.

61 We therefore suggest that the Council be asked to identify PDL sites in the Green Belt (in addition to the major sites already identified), and consider their contribution to Green Belt purposes and the openness of the Green Belt and on the basis of this assessment, their potential for release from Green Belt designation.

62 Development interests, including our clients, Countryside Properties, have presented evidence to the Council on the existence of PDL sites in the Green Belt that will help inform this assessment.

63 It is therefore of fundamental importance that the Council demonstrates that the proposed approach with regard to previously developed land in the Green Belt is supported by a robust evidence base so that all reasonable options and alternatives to deliver housing are considered.

**Q9.5 .....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?**

64 We have identified significant limitations in the Council's approach to Green Belt review which identifies Potential Development Areas (PDAs) and Major Potential Development Areas (MPDAs).

65 First, the GBCS considers that a land parcel either contributes or not to each Green Belt purpose (i.e. with the parcel scoring either 1 or 0) without assessing the degree /extent of that contribution.

66 Second, as a result of this first limitation, the methodology of the GBCS does not allow for any detailed form of ranking to assess the relative contribution each land parcel makes towards the purposes of including land within the Green Belt. The GBCS did not therefore carry out any form of comparative assessment between the identified PDAs/MDPAs.

67 Third, it is inappropriate to consider only these large parcels and not the subdivisions within them, as this removes potentially suitable land from consideration due only to wider Green Belt impacts of a larger parcel that a site sits within, and not based on any site specific considerations.

68 As a result, the methodology to identify and justify sites for Green Belt release is incomplete and this affects the soundness of judgements about the number, scale and location of such releases. This is important, given the reliance of the Plan on major or strategic scale Green Belt releases and has resulted in options for smaller scale Green Belt allocations being overlooked or neglected.

69 The limitations of this methodology also mean that the process of demonstrating exceptional circumstances for each site removed from the Green Belt is incomplete.

- 70 Boyer has adopted a scoring methodology to address these issues and quantify the contribution made by each PDA/ MPDA towards the purposes of including land within the Green Belt. This was based on guidance published by the Planning Advisory Service (PAS) and the approach of other Local Planning Authorities. The aim was to build upon the methodology of the GBCS by enabling a comparison between potential sites identified through the Local Plan process. This methodology was provided to Guildford Council on 11th March 2016.
- 71 This approach, together with the sustainability methodology adopted within the GBCS, was applied to the 11 PDAs/MPDAs surrounding Send, Send Marsh & Burntcommon and Ripley. However, it is the principles involved that are important and we consider that the Council should be asked to consider the merits of this approach and any resulting potential for the identification and release of additional Green Belt sites to assist in housing delivery and reduce the Plan's heavy reliance on major sites that will deliver homes late in the Plan period.
- 72 The Boyer report forms Appendix 1 to this statement.

**Q9.6 Does the plan take a sound approach towards the inseting of various villages from the Green Belt?**

- 73 We have considered this issue in our response to Matter 4.2 above as we consider that additional areas for development can be identified by careful consideration of the boundaries of villages to be inset from the Green Belt.
- 74 As documented in our response to Matter 4.2, the previous June 2016 Regulation 19 draft of the Plan specifically proposed adjustments to these boundaries and it is not clear why these adjustments are no longer made. As the Council has already been through this process, we consider that the matter should be revisited to both maximise potential housing supply from small sites within extended village envelopes and address the needs and character of each village proposed to be inset from the Green Belt.

**Q9.8 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?**

- 75 In our response to Matters 4 and 5 above we have considered actions necessary to identify additional small scale sites that would diversify housing supply and allow a higher rate of delivery in the early years of the Plan. We have suggested that the Inspector and the Council consider the potential scope and capacity for:
- A more rigorous and transparent assessment of smaller scale PDL sites within the Green Belt as potential additional Green Belt releases and allocations (rather than confining this assessment to major PDL sites to be inset from the Green Belt)



- By addressing specific limitations in the Green Belt review methodology that may have resulted in certain sites being rejected as candidates for Green Belt release and allocation for development
  - Accommodating development within minor modifications to the boundaries of villages inset from the Green Belt (as proposed in the July 2016 Plan)
  - By identifying safeguarded sites and reserve land (as proposed to an extent in the July 2014 Plan)
- 76 These actions will help diversify and strengthen the Plan's housing trajectory by focussing on the addition of small sites to those currently proposed for allocation and, to an extent, redress the imbalance between small and strategic sites within the sites currently proposed for allocation.
- 77 However, we do not suggest that sites currently proposed for allocation be deleted and the additional sources of housing supply we have identified will accommodate a greater housing requirement should this be a consequence of the examination of the Plan under Matters 2 and 3.
- 78 This potential additional housing land arises primarily in and adjoining the villages proposed to be inset from the Green Belt on the basis of known sites which are available and entirely suitable for development. This is consistent with the settlement hierarchy set out in paragraphs 4.38 and 4.39 of the Council's housing delivery topic paper and the emphasis in the spatial strategy on sustainable locations for development. It will not significantly change the spatial distribution of housing.

# **APPENDIX ONE – BOYER GREEN BELT REPORT**



# Land at Polesden Lane and Send Marsh Road, Send Marsh

Green Belt Assessment

**Boyer**

## Report Control

Project:	Land at Polesden Lane & Send Marsh Road, Send Marsh
Client:	Trenfold Property Limited & Countryside Properties (UK) Ltd
Reference:	15.452
File Origin:	Document2
Primary Author	Philip Allin
Checked By:	Julia Mountford

<i>Issue</i>	<i>Date</i>	<i>Status</i>	<i>Checked By</i>
1	22/12/15	Draft	
2	10/02/16	Draft	
3	08/03/16	Final Draft	Mike Newton
4	10/03/16	Final	Philip Allin

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## **APPENDIX**

- Appendix One – Site Location Plan
- Appendix Two – Planning Policy Background
- Appendix Three – Best Practice Guidance
- Appendix Four- Plan of PDAs/MPDAs
- Appendix Five - Landscape Character Assessment



# 1. EXECUTIVE SUMMARY

- 1.1 This report has been prepared as part of the on-going promotion of land at Polesden Lane and Send Marsh Road, Send Marsh ('the site'). The objective of the report is to assess the site's contribution to the purposes of including land within the Green Belt, against that of other potential sites.
- 1.2 The previous draft Local Plan (2014) concluded that to meet the proposed housing target there would need to be some release of Green Belt land. A number of sites within the Send / Send Marsh area were therefore proposed for removal from Green Belt designation and allocated for development. The next version of the Local Plan has yet to be published and it is not known at this stage which sites previously identified will continue to be allocated. This is an important decision and one that this report is intended to assist and inform.
- 1.3 The Local Plan (2014) is supported by the Council's Green Belt and Countryside Study (GBCS). The GBCS identified a number of Potential Development Areas (PDAs) and Major Potential Development Areas (MPDAs) for assessment against the purposes of including land within the Green Belt. Our purpose is to supplement the GBCS based on guidance published by the Planning Advisory Service (PAS) and the approach of other Local Planning Authorities.
- 1.4 The GBCS has two significant limitations that we have sought to address in this report with a view to assisting the Council and strengthening the Local Plan evidence base.
- 1.5 **First**, the GBCS considers that a land parcel either contributes or not to a specific Green Belt purpose (i.e. with the parcel scoring either 1 or 0) without providing any quantification on the degree of that contribution (for example the extent to which a land parcel makes only a partial contribution).
- 1.6 **Second**, as a result of this first limitation, the methodology of the GBCS does not allow for any detailed form of ranking to assess the relative contribution each land parcel makes towards the purposes of including land within the Green Belt. The GBCS did not therefore carry out any form of comparative assessment between the identified PDAs/MPDAs.
- 1.7 We have adopted a scoring methodology to address these issues and quantify the contribution made by each PDA/MPDA towards the purposes of including land within the Green Belt. The aim is to build upon the methodology of the GBCS by enabling a comparison between potential sites already identified through the Local Plan process.
- 1.8 This approach, together with the sustainability methodology adopted within the GBCS, has been applied to the 11 PDAs/MPDAs surrounding Send, Send Marsh & Burntcommon and Ripley.

- 1.9 This assessment concludes that the site, at best, makes only a very limited contribution to the purposes of including land within the Green Belt. When compared with the PDAs/MPDAs assessed, it is ranked joint top along with land south of Burntcommon. It is considered therefore that its release from the Green Belt would not have any adverse impact on the purpose and function of the Green Belt in this part of the Borough.
- 1.10 The site is adjacent to the village settlement boundary to the north, east and south and is therefore largely within the existing village envelope. The smaller part of the northern boundary, and the western boundary, adjoin fields but these boundaries comprise of strong and mature landscaping.
- 1.11 Overall, the site is bordered by established housing and defensible boundaries. It therefore has an enclosed character that is visually contained and separate from the wider countryside beyond. Furthermore, the Site's western boundary does not extend much beyond the western edge of the existing settlement and does not therefore fall clearly within any identifiable gap between Send and Send Marsh.
- 1.12 The landscape character assessment by FLA (Appendix 5) concludes as follows:
- “The previous land use for Kennels and other sui-generis uses suggest that the areas landscape character relates more to the village fringe than that of the more open land to the west. Therefore, I consider that this is an in-fill site which relates well to the historic field pattern and although the area does lie on the western edge of the village of Send Marsh, it does not form part of the open land to the west which is part of the gap between the two village settlements.”*
- 1.13 The site is easily accessible to a range of facilities within Send and Send Marsh including The Village Medical Centre, St Bede's Junior School, The Saddlers public house and Send Village Hall. In these terms it compares favourably with other PDAs/MPDAs, especially those surrounding Send Marsh & Burntcommon and Ripley. This combination of good access to facilities and a high degree of separation and containment from adjoining countryside means that the site represents a logical extension to Send Marsh.
- 1.14 In light of the characteristics of the site and the Council's recognition that there is a need for Green Belt release to meet the proposed housing target, we consider that the site should be removed from the Green Belt and allocated for new residential development through the emerging Local Plan.

#### **Comparative Assessment**

- 1.15 The table below identifies the eight PDAs at Send Marsh, Send and Ripley as defined within the GBCS. However, the table provides Boyer's assessment of each site against Green Belt purposes and, using the Boyer methodology, allows their relative contribution to be assessed and for the sites to be ranked accordingly.



- 1.16 As stated above, the site is ranked joint top along with land south of Burntcommon. We conclude that its release from the Green Belt would not have any adverse impact on the purpose of the Green Belt in this part of the Borough.

**Table 3 – Contribution to Green Belt Purposes – Sites at Send Marsh, Send and Ripley**

Site	Contribution to Green Belt Purpose				Score	Rank
	1	2	3	4		
The Site (Site B16-A)	1	2	1	1	5	1=
Land between Polesden Lane & Manor Road (Site B16-B)	1	4	3	1	9	3=
Land between Send Marsh Road, Green Drive, Meadow Drive and Tuckey Grove (Site B15-C)	1	4	3	1	9	3=
Land South of Burntcommon (Site B13-D)	1	2	1	1	5	1=
Land at Tannery Lane, Send Road, Walnut Tree Place & Maysfield Road (Site B16-Ai)	1	4	1	1	7	2=
Land between Sanger Drive, Wharf Lane & Oat Lane (Site B16-Ci)	1	5	5	1	12	5=
Land at Send Hill (Site B10-B)	1	4	1	1	7	2=
Land south west of Ripley (Site B16-Aii)	1	6	5	1	13	6=

## 2. Introduction

- 2.1 This report has been prepared by Boyer to assist the emerging Local Plan being prepared by Guildford Borough Council. This report builds upon earlier representations made to the Council in response to consultation on the emerging Local Plan and its supporting evidence base.
- 2.2 Trenfold Property Limited and Countryside Properties (UK) Ltd, whom Boyer is representing, control a parcel of land at Polesden Lane and Send Marsh Road, Send Marsh (referred to as 'the site'). Countryside Properties (UK) Ltd are a contractual purchaser for the site and are able to deliver this site early in the plan period. A Site Location Plan is attached at [Appendix 1](#).
- 2.3 This report seeks to assist and inform the Council's spatial strategy by undertaking a review of the current Green Belt and Countryside Study (GBCS), undertaken by Pegasus on behalf of the Council, having regard to relevant guidance set out within national planning policy, best practice guidance, recent examples of Green Belt assessments carried out by other authorities and other policy considerations (e.g. the findings of the recent Strategic Housing Market Assessment for west Surrey [SHMA]).
- 2.4 As part of this report, an assessment has been undertaken of the other sites / potential development areas around Send and Send Marsh that have been identified for residential development through the emerging Local Plan and supporting evidence base. The purpose of this is to understand how the site and other potential sites contribute to the purposes of including land within the Green Belt. This includes a landscape assessment with the aim of awarding a score to each site to allow a qualitative assessment to be done.
- 2.5 Each site's sustainability credentials are also considered. However the assessment does not cover technical matters associated with the development of individual sites (e.g. flood risk implications).
- 2.6 The aim is therefore to build upon the methodology of the GBCS by establishing an approach that enables a comparison between potential sites already identified through the Local Plan process. The findings of this assessment are set out within the overview and conclusions chapter.

### **The Site**

- 2.7 The Site lies immediately behind existing properties at the junction of Polesden Lane and Send Marsh Road, Send Marsh and has an area of approx. 2.6ha. It is bordered to the south and east and also partly to the north by existing residential properties in the village of Send Marsh. It is bordered to the remainder of the north and west by a substantial tree belt, beyond which to the north is the infilled gravel excavation referred to in the Landscape report (see appendix 5) and to the west is farmland. The site comprises scrub grassland together with the spoil and hardstandings and one remaining building associated with its previous use as a commercial breeding kennels and later associated with a tractor and earthmoving equipment distributor's yard and storage.
- 2.8 Whilst the site does not currently fall within the settlement boundary, as defined in the Local Plan 2003, it nevertheless lies within the effective framework of Send Marsh Village, being bordered on three sides by established housing and defensible boundaries. Send Marsh comprises an enclave of established housing closely related to the larger village of Send to the west. The Danesfield development to the east marked a significant change to the character of this part of Send Marsh, introducing a distinct element of estate housing in an area which previously had comprised ribbon housing and non-residential uses.
- 2.9 The site is broadly level and featureless with no significant vegetation other than on its boundaries. There is clear inter-visibility between the site and the adjoining housing. The site possesses a high quality vehicular access from Danesfield which is suitable to serve development at the site. Around the outer boundary is a public footpath providing a recreational link into open countryside.

### 3. PLANNING POLICY POSITION

- 3.1 The statutory development plan of Guildford Borough Council currently comprises of the saved policies of the adopted Local Plan (2003). The Council have commenced work on their replacement Local Plan having most recently published the Draft Local Plan Strategy and Sites Document for consultation between July and September 2014. This document sets out the Council's proposed spatial strategy for the period up to 2031, including the level and location of new housing to be delivered within the Borough.
- 3.2 Guidance on the preparation of Local Plans is set out within the National Planning Policy Framework (The Framework) and expanded upon within the Planning Practice Guidance (The Guidance). These documents provide guidance in a number of areas including the approach to be taken in respect to the Green Belt and the need to identify the objectively assessed housing need of the housing market area. This guidance is explained further within [Appendix 2](#).
- 3.3 In order, therefore, for the Council to have a sound Local Plan it needs to be supported by a robust evidence base. The Council's evidence base is made up of a number of documents including the West Surrey Strategic Housing Market Assessment (SHMA [October 2015]) and Guildford Borough Green Belt and Countryside Study (GBCS [February 2013]).
- 3.4 The SHMA identifies an overall housing need for the period 2013-33 within Guildford of 693 homes per annum, which is higher than the housing target set out within the previous version of the Local Plan (652 homes per annum).
- 3.5 The previous draft Local Plan (2014) identified that it would be necessary to provide new housing within the Green Belt in order to meet this identified need. The next consultation on the draft Local Plan will provide additional detail on the Council's spatial strategy and the potential release of Green Belt land to meet the development requirements of the Borough will continue to form part of the emerging Local Plan. It is therefore important that the supporting Green Belt Assessment is robust.
- 3.6 The methodology of the GBCS, which is explained in greater detail within [Appendix 2](#), follows a number of stages. The GBCS divided the Borough into a number of land parcels with an assessment being made of each against the purposes of including land within the Green Belt. The methodology though did not quantify the scale of contribution made by each parcel of land and so it was not possible to determine whether a particular land parcel made a minor or major contribution to each purpose of including land within the Green Belt.

- 3.7 The GBCS assessed whether smaller areas of land could be identified for potential development without compromising the overall contribution of the wider land parcel. This resulted in the identification of Potential Development Areas (PDAs). Consideration was also given to potential major expansion of villages that resulted in the identification of Major Potential Development Areas (MPDAs). For each PDA and MPDA the GBCS undertook an assessment of sustainability based on a set of criteria as well as providing an indication of likely capacity. The GBCS did not though carry out any form of comparative assessment between the identified PDAs/MDPAs.

### **Best Practice**

- 3.8 Following the publication of the main body of the GBCS the Planning Advisory Service (PAS) published guidance on the preparation of Green Belt Assessments titled 'Planning on the Doorstep: The Big Issues – Green Belt' in January 2014. The guidance highlights that any analysis of Green Belt should involve an assessment of how the land still contributes to the five purposes of including land within the Green Belt. It also acknowledges that there are planning objectives that are not addressed in the five Green Belt purposes, for example landscape value, accessibility and environmental assets. Additional detail on this guidance is set out within [Appendix 3](#).
- 3.9 In order to understand how this guidance has been applied by other Local Planning Authorities, a review of Green Belt Assessments undertaken by other authorities located within the Green Belt surrounding London has been carried out. The results of this are summarised within [Appendix 3](#).
- 3.10 Based on the review of best practice guidance and other Green Belt reviews, it is evident that a two stage process is followed. First an assessment is undertaken against the relevant purposes of including land within the Green Belt with each strategic parcel of land given a qualitative score in order to inform whether further consideration should be given to particular parcels. Then a further assessment is made based on the individual characteristics of parts of the parcel (e.g. landscape, sustainability) to determine whether any land should be released from the Green Belt.
- 3.11 Whilst this is similar to the approach taken by the GBCS, it is evident that a clearer assessment against the Green Belt purposes has been undertaken by other authorities that provides a score against which the sites can be compared. As such we have undertaken our own assessment of the identified PDAs/MPDAs that follows this approach as set out within the following chapter.

## 4. ASSESSMENT

- 4.1 In light of the best practice guidance and other relevant examples we consider that the strategic nature of the GBCS results in some limitations, mostly due to the methodology in identifying the contribution each land parcel makes towards the purposes of including land within the Green Belt. There are two significant limitations that we have sought to address in this report.
- 4.2 First, the GBCS considers that a land parcel either contributes or not to a specific Green Belt purpose (i.e. with the parcel scoring either 1 or 0) without providing any quantification, for example whether a land parcel makes only a partial contribution. More recent assessments in other authorities, however, have sought to quantify the contribution a land parcel makes to a specific Green Belt purpose
- 4.3 Second, as a result of this first limitation, the methodology of the GBCS does not allow for any detailed form of ranking when it comes to the contribution the land parcels make towards the purposes of including land within the Green Belt.
- 4.4 Notwithstanding this, the GBCS does identify a number of small PDAs that are considered not to significantly compromise the land parcel score as a whole. These have included sites that have subsequently been proposed as site allocations or safeguarded sites within the previous draft Local Plan (2014) (site references 74-76). The site was previously identified as safeguarded land (site reference 120).
- 4.5 The next version of the Local Plan has yet to be published and so it is not known how this previous assessment will feed into the pre-submission version of the Local Plan due to be published later in 2016 and whether those sites allocated in the previous draft of the Local Plan will continue to be allocated. This is an important decision and one that this report is intended to assist and inform.
- 4.6 In light of the above limitations of the GBCS, we have sought to provide a comparative assessment of all the sites identified within the GBCS surrounding Send, Send Marsh / Burntcommon and Ripley. An assessment has been undertaken to determine the level of contribution each makes towards the purposes of including land within the Green Belt to assist in informing the emerging Local Plan. We have used the PDAs and MPDAs identified in the GBCS as a basis for our own expanded assessment. Tables and plans of the PDAs and MPDAs that are the subject of this assessment are set out within [Appendix 4](#).
- 4.7 Given that there have already been two consultations on the emerging Local Plan and various iterations of the Council's Strategic Housing Land Availability Assessment (SHLAA) it is considered that the sites listed in the tables, contained within appendix 4 represent a comprehensive list of all those sites that have been promoted in and around Send, Send Marsh / Burntcommon and Ripley. The following sub-sections summarise this assessment and the scores given to each site. The overview and conclusions chapter summarises the findings of this assessment, also having regard to the sustainability of each site.

### Assessment Methodology

- 4.8 The following sections also provide a summary of the characteristics of each potential development area which is described in detail within the accompanying Landscape Character Assessment (LCA) prepared by Furse Landscape Architects, attached at [Appendix 5](#). The LCA, in accordance with guidance outlined by PAS (see appendix 3), has also informed the score given to each potential development area and its contribution to preventing neighbouring towns merging into one another and assisting in safeguarding the countryside from encroachment. In addition, the description and key characteristics of each PDA and MPDA is taken from the LCA.
- 4.9 To follow the approach taken by other local authorities, a score ranging from 1 (weak or very weak) to 5 (strong or very strong) has been awarded to each potential development site's contribution to the four Green Belt purposes assessed (as with the GBCS, the fifth Green Belt purpose relating to assisting in urban regeneration has not been assessed).
- 4.10 The table below summarises our scoring methodology used within this document:

Table 1 – Boyer Scoring Methodology

GreenBelt Purpose	Methodology
1 - To check the unrestricted sprawl of large built up areas	Send / Send Marsh / Burntcommon and Ripley are not considered to constitute 'large built-up areas' and so all sites assessed achieve a score of 1 in respect to the contribution to this Green Belt purpose.
2 - To prevent neighbouring towns from merging into one another	As advocated by PAS, rather than base this assessment on just distance between settlements, a landscape assessment has been undertaken to inform the level of contribution individual sites make. The LCA assesses each potential development area in respect to its landscape susceptibility and sensitivity as all sites are adjacent to an existing urban area. For sites that have a 'low' susceptibility and sensitivity, a score of 1 is awarded, For sites that have a 'low' and 'medium' susceptibility/sensitivity a score of 2 is awarded. For a 'medium' susceptibility and sensitivity a score of 3 is awarded. For a 'medium' and 'high' susceptibility/sensitivity a score of 4 is awarded and for a 'high' susceptibility and sensitivity a score of 5 is awarded. An additional score of 1 is awarded if the sites/areas are considered to significantly reduce the degree of separation between neighbouring settlements (meaning a total score of 6 is achievable).
3 - To assist in safeguarding the countryside from encroachment	The score awarded is based on the 'urban fringe' characteristics of sites. For sites with no urban fringe characteristics, a score of 5 is awarded (i.e. a strong contribution to including land within the Green Belt); for sites that have some urban fringe characteristics, a score of 3 is awarded and for sites that have many urban fringe characteristics, a score of 1 is awarded (i.e. weak contribution to including land within the

	Green Belt)
4 - To preserve the setting and special qualities of historic towns	As set out within the PAS guidance this test is likely to apply to very few settlements. As none of the assessed sites are immediately adjacent to a conservation area, all sites achieve a score of 1.

4.11 The above methodology forms the basis of our assessment of the PDAs/MPDAs identified by the GBCS in the Send / Send Marsh area. The aim is to supplement work undertaken by the GBCS to enable an accurate comparative assessment of all the sites.

### Potential Development Areas (PDAs)

4.12 The PDAs identified by the GBCS are assessed below using the Boyer Green Belt review methodology.

#### *Site B16-A – The Site*

4.13 The area has an enclosed character and has been left in a dilapidated state since the previous use ceased (kennels and building yard). The Site’s western boundary does not extend much beyond the western edge of the existing settlement and does not therefore fall clearly within the identifiable gap between Send and Send Marsh. In contrast to the character of the site, the land to the west is more open in nature. The adjacent land provides more of a visible and physical buffer between the two villages, with open views across the open fields to the north from the B368. The Grade II listed Aldertons is located to the south west of the site. The existing landscaping along the sites western boundary is considered to limit inter-visibility between the sites.

4.14 The site’s previous use suggests that its landscape character relates more to the urban fringe than that of the more open land to the west. The key characteristics of the site can be summarised as follows:

- Historic strong mature boundary features to the west and north;
- Enclosed area with scattered mature trees;
- Previous land use evident;
- Adjacent to the village settlement boundary on two sides and adjacent to two Grade II listed buildings;
- Adjacent footpaths provide direct close views into the area through the trees; and
- Recent new development to the east of the area.



Table 2a – Boyer Site Score

Green Belt Purpose	Score
1. To check the unrestricted sprawl of large built-up areas.	1
2. To prevent neighbouring towns merging into one another.	2
3. To assist in safeguarding the countryside from encroachment.	1
4. To preserve the setting and special character of historic towns.	1

*Site B16-B - Land between Polesden Lane & Manor Road, Send Marsh*

- 4.15 The area has a semi-enclosed intimate scale with views out to the north and across the valley to the east through and above the trees on the eastern boundary of the area. These views of the hillside beyond are interrupted by a high voltage pylon for a power line that runs through the valley to the east. The area provides direct links to the recreational area to the north and the network of footpaths both statutory and permissive, with a route from Polesdon Lane.
- 4.16 The combination of the historic setting and the recreational uses of the area results in a medium landscape susceptibility and high sensitivity rating. This area relates more to the woodland and lake area to the north in terms of historic setting and recreational activities and these characteristics account for the scoring below in relation to Green Belt purposes 2 and 3. In strictly landscape terms, the area relates more to the village settlement character type (i.e. urban fringe). The key characteristics of the site can be summarised as follows:
- Strong eastern linear boundary feature;
  - Northern boundary is fragmented and minimal, providing views between the site and surrounding countryside.
  - Rising ground to the east;
  - Public footpath to northern boundary;
  - Public use for recreation;
  - Setting for three Grade II listed buildings; and
  - Surrounded on two sides by the village settlement boundary.

Table 2b – Boyer Site Score

Green Belt Purpose	Score
1. To check the unrestricted sprawl of large built-up areas.	1
2. To prevent neighbouring towns merging into one another.	4
3. To assist in safeguarding the countryside from encroachment.	3
4. To preserve the setting and special character of historic towns.	1

*Site B15-C - Land between Send Marsh Road, Green Drive, Meadow Drive and Tuckey Grove, Send Marsh*

- 4.17 The area is in the gap between the villages Send, Send Marsh and Burntcommon to the south. The historic parkland landscape character of the adjacent area has a concurrent boundary with the site and therefore the area can be viewed as playing a part of the setting of the Grade II listed Aldertons. There are no public footpaths directly adjacent to the western boundary of the area, although footpath 42 does provide views to the west across the parkland setting of Aldertons and Boughton Hall, especially where the footpath rises up towards the rear gardens of properties along Broughton Hall Avenue.
- 4.18 In light of the site’s strong western boundary and the width of the gap between settlements at this point, the site is considered to relate to the urban fringe landscape. However, the area does provide the last open area of landscape that can be viewed from the historic village green and the four listed buildings that surround it on the northern and eastern sides. Therefore, this area contributes to the wider landscape character due to its role in providing green open space around the setting of the listed buildings within the village and their visual links. This fact and the site’s contribution to the setting of the listed Aldertons, accounts for the scoring against Green Belt purposes in the table below.
- 4.19 The key characteristics of the site can be summarised as follows:
- Mature historic western boundary extended north with new young boundary planting of Poplar and native hedge species below;
  - Open semi-improved grass pastures subdivided with post and wire fencing;
  - Northern and southern area demarcated by young boundary planting crossing the area;
  - Low manicured hedges to road frontage;
  - Views from the site constrained by internal hedge and Poplar tree planting;
  - Provides a landscape that can be viewed from the village green and the four listed buildings that surround it

- Historic parkland estate landscape adjacent to the west of the site; and
- Area is surrounded on three sides by the existing village settlement boundary.

Table 2c – Boyer Site core

Green Belt Purpose	Score
1. To check the unrestricted sprawl of large built-up areas.	1
2. To prevent neighbouring towns merging into one another.	4
3. To assist in safeguarding the countryside from encroachment.	3
4. To preserve the setting and special character of historic towns.	1

*Site B13-D - Land South of Burntcommon, Send Marsh*

4.20 The character of this area is enclosed and dominated by both large commercial properties and the reuse of redundant highway geometry which has led to a mix of discordant elements in the landscape. On this basis the site is strongly related to the urban fringe. The landscape character is somewhat diminished towards the south beyond the mature field boundary around the single dwelling. The key characteristics of the site can be summarised as follows:

- Strong linear feature of trees on the alignment of the B2215;
- Redundant highway alignment reused although it has left large road geometry in place that is inconsistent with reduced traffic flows;
- Northern area to the east of the B2215 is well screened by boundary vegetation aided by the A3 being at a lower level along this section of the road;
- Private gardens to existing dwellings along the A247 northern boundary to the east of B2215; and
- Large commercial properties to the east of B2215.

Table 2d – Boyer Site Score

Green Belt Purpose	Score
1. To check the unrestricted sprawl of large built-up areas.	1
2. To prevent neighbouring towns merging into one another.	2
3. To assist in safeguarding the countryside from encroachment.	1
4. To preserve the setting and special character of historic towns.	1

*Site B16-Ai - Land at Tannery Lane, Send Road, Walnut Tree Place & Maysfield Road, Send*

4.21 The area is enclosed in nature and being undisturbed by sand and gravel extraction works, provides enclosed green space adjacent to the village settlement boundary. The eastern boundary is a little less defined. The site is subdivided into small paddocks with direct access onto Tannery Lane. The site’s enclosed nature and strong boundaries on three sides allow this site to relate more to the urban fringe landscape. The key characteristics of the site can be summarised as follows:

- Public footpath 44 running along the north eastern boundary of the area;
- Strong village settlement boundary;
- Surrounded on three sides by the village settlement boundary;

Table 2e – Boyer Site Score

Green Belt Purpose	Score
1. To check the unrestricted sprawl of large built-up areas.	1
2. To prevent neighbouring towns merging into one another.	4
3. To assist in safeguarding the countryside from encroachment.	1
4. To preserve the setting and special character of historic towns.	1

*Site B16-Ci - Land between Sanger Drive, Wharf Lane & Oat Lane, Send*

4.22 The area consists of one large field with a smaller field to the north adjacent to the Mill and Old Tannery. As with the other landfilled areas, the topography is slightly domed with boundaries formed of wide hedges. There are direct views into this area from the properties along the eastern edge of the village along Wharf Lane and people using public footpath 49 linked to the Wey Navigation. Views from the Wey Navigation are partially screened by vegetation along its banks. Views from Tannery Lane are similarly screened by hedgerows along the roadside verge. Overall, the site along this section of the Wey Navigation provides open views and a rural perception to users of the route for recreational purposes. The key characteristics of the site can be summarised as follows:

- Large open fields with raised topography due to gravel extraction activities;
- Field boundaries wide and mainly consisting of willow species;
- More mature trees found along external boundaries not disturbed by sand and gravel extraction activities; and

- Directly adjacent to the Wey Navigation which is a popular recreation route for walkers and boats.

Table 2f – Boyer Site Score

Green Belt Purpose	Score
1. To check the unrestricted sprawl of large built-up areas.	1
2. To prevent neighbouring towns merging into one another.	5
3. To assist in safeguarding the countryside from encroachment.	5
4. To preserve the setting and special character of historic towns.	1

*Site B10-B – Land at Send Hill*

4.23 The area is ringed by public footpaths and the use of the area itself, which could be without the land owners consent or knowledge, means it has a recreational value. The enclosed nature of the area, with limited views out across the valley to the west, make it very well screened from visual receptors in the west. Views from adjacent properties are dependent on the extent of intervening vegetation within their gardens and along the site boundary. Given the site's location it is considered to be closely related to the urban fringe settlement character type. The key characteristics of the site can be summarised as follows:

- Strong vegetative boundaries to the south, north and west;
- There are scattered young to mature trees across the area;
- Enclosed secluded nature of the area;
- Adjacent to village settlement boundary on the whole east side of the site;
- The area is ringed by public footpaths and the road; and
- The area is used for public recreation and links to public footpath network.

Table 2g – Boyer Site Score

Green Belt Purpose	Score
1. To check the unrestricted sprawl of large built-up areas.	1
2. To prevent neighbouring towns merging into one another.	4
3. To assist in safeguarding the countryside from encroachment.	1
4. To preserve the setting and special character of historic towns.	1

*Site B16-Aii - Land south-west of Ripley*

4.24 The area has large open fields with fragmented boundary features and a predominance of Willow and Poplar species scattered along field boundaries. The properties adjoining the area in Georgelands have direct and close views into the area with longer views opening up across the lake area, although the lakes are not directly visible due to their lower level. The proximity of the hamlet of Grove Heath to the south of the area produces the effect that the area is the only large section to the west of the B2215 Portsmouth Road that has not been developed. The key characteristics of the site can be summarised as follows:

- Large open field;
- Strong western boundary adjacent to the Papercourt Lakes;
- Open views from both B367 and B2215 into the area and beyond;
- Adjacent to village settlement boundary along eastern boundary; and
- Area provides a visual and physical break in the development along the B2215 Portsmouth Road, separating the villages of Ripley to the north and the hamlet of Grove Heath to the south.

Table 2h – Boyer Site Score

Green Belt Purpose	Score
1. To check the unrestricted sprawl of large built-up areas.	1
2. To prevent neighbouring towns merging into one another.	6
3. To assist in safeguarding the countryside from encroachment.	5
4. To preserve the setting and special character of historic towns.	1

**Major Potential Development Areas**

*Site B12/B13 - Land south-west of Send Marsh*

4.25 The area has strong landscape features and has two distinct character types. To the west open managed agricultural/equestrian land use with open views and strong boundary features. To the east the character type is more enclosed and dominated by both large commercial properties and the reuse of redundant highway geometry which has led to a mix of discordant elements in the landscape. This landscape character is somewhat diminished towards the south beyond the mature field boundary around the single dwelling. The key characteristics of the area can be summarised as follows:

- Strong linear feature of trees on the alignment of the B2215;

- Redundant highway alignment reused although it has left large road geometry in place for reduced traffic flows;
- Northern area to the east of the B2215 is well screened by boundary vegetation aided by the A3 being at a lower level along this section of the road;
- Private gardens to existing dwellings along the A247 northern boundary to the east of B2215;
- Open views across the valley to the west and southwest from the A247 from its roundabout junction with B2215. Properties on the north of the A247 also benefit from these open views across the valley; and
- Large commercial properties to the east of B2215.

4.26 The table below summarising the area’s contribution to the Green Belt purposes is based on the most sensitive part of the site on the assumption that development would take place on the whole site, especially as part of the site is identified and assessed above as a separate PDA.

Table 2i – Boyer Site Score

Green Belt Purpose	Score
1. To check the unrestricted sprawl of large built-up areas.	1
2. To prevent neighbouring towns merging into one another.	5
3. To assist in safeguarding the countryside from encroachment.	3
4. To preserve the setting and special character of historic towns.	1

*Site B14 - Land south-east of Send Marsh*

4.27 The area covers two distinct character types, the more intimate spaces created by woodland and hedges in the northern area and the southern area which is more open in nature with long views out of and into the area. The A3 and the high voltage pylons are a constant feature in both acoustic and visual terms in the southern area. However these have a reduced impact on the northern area. There are strong vegetative boundaries along the B2215 and the suburban form of the village edge along Burt Common Lane. The A3 has bisected the original mature woodland blocks visually and physically and cut the valley topography by introducing a level grade swathe through the landscape. The key characteristics of the area can be summarised as follows:

- Rolling topography focused on the small stream that crosses the area west to east;
- Large high voltage pylons bisecting the site along a line southwest to northeast;

- Wide open views of the A3 from the southern part of the area with views extending across the A3 into adjoining areas to the east;
- Blocks of mature woodland and hedges with mature trees in field boundaries in the north;
- Village settlement edge demarcated by Burnt Common Lane; and
- Natural topography bisected by A3 embankment and cutting.

4.28 The table below summarising the areas contribution to the Green Belt purposes is based on the most sensitive part of the site based on the assumption that development would take place on the whole site

Table 2j – Boyer Site Score

Green Belt Purpose	Score
1. To check the unrestricted sprawl of large built-up areas.	1
2. To prevent neighbouring towns merging into one another.	5
3. To assist in safeguarding the countryside from encroachment.	3
4. To preserve the setting and special character of historic towns.	1

*Site B16 - Land north-east of Send*

4.29 The area is located on the eastern side of Send and forms part of a larger parcel of land that separates Send from Send Marsh and Ripley. The proximity of the village settlement boundary along the southwestern boundary, the B368 Send Marsh Road along the southern boundary and the Wey navigation along the northern boundary provides strong boundary features in the landscape. The eastern boundary is less well defined in landscape character terms, with alignment demarcated by public footpaths and field boundaries. The western area due to its location, landscape character and proximity to Send Marsh, forms part of the major part of the gap between the two villages. The key characteristics of the area can be summarised as follows:

- Large open fields with raised topography due to gravel extraction activities;
- Field boundaries wide and mainly consisting of willow species;
- Strong village settlement boundary along southwestern boundary of the area;
- Tannery Lane bisects the area with the larger portion to the east;
- More mature trees found along external boundaries not disturbed by sand and gravel extraction activities; and



- Western extent of the area is in the gap between the two villages of Send and Send Marsh

4.30 The table below summarising the areas contribution to the Green Belt purposes is based on the most sensitive part of the site based on the assumption that development would take place on the whole site, especially as part of the site is identified as a separate PDA.

Table 2k – Boyer Site Score

Green Belt Purpose	Score
1. To check the unrestricted sprawl of large built-up areas.	1
2. To prevent neighbouring towns merging into one another.	6
3. To assist in safeguarding the countryside from encroachment.	5
4. To preserve the setting and special character of historic towns.	1

## 5. OVERVIEW

- 5.1 The approach undertaken within the preceding chapter allows for a much more detailed assessment of potential development areas in the Send / Send Marsh area which was not possible within the GBCS, given its strategic nature. Furthermore, the assessment process undertaken as part of this report has been informed by a detailed Landscape appraisal with the use of a standardised scoring system allowing for a comparison of all the assessed sites. This approach, which is consistent with that taken by other local authorities, is intended to assist the emerging Local Plan process. Taking into account the findings of the assessment the table below outlines the overall score awarded to each site based on its contribution to the assessed Green Belt purposes.

Table 3 – Contribution to Green Belt Purposes

Site	Contribution to Green Belt Purpose				Score	Rank
	1	2	3	4		
The Site (Site B16-A)	1	2	1	1	5	1=
Land between Polesden Lane & Manor Road (Site B16-B)	1	4	3	1	9	3=
Land between Send Marsh Road, Green Drive, Meadow Drive and Tuckey Grove (Site B15-C)	1	4	3	1	9	3=
Land South of Burntcommon (Site B13-D)	1	2	1	1	5	1=
Land at Tannery Lane, Send Road, Walnut Tree Place & Maysfield Road (Site B16-Ai)	1	4	1	1	7	2=
Land between Sanger Drive, Wharf Lane & Oat Lane (Site B16-Ci)	1	5	5	1	12	5
Land at Send Hill (Site B10-B)	1	4	1	1	7	2=

Site	Contribution to Green Belt Purpose				Score	Rank
	1	2	3	4		
Land south-east of Ripley (Site B16-Aii)	1	6	5	1	13	6=
Land south-west of Send Marsh (Site B12/B13 (MPDA))	1	5	3	1	10	4=
Land south-east of Send Marsh (Site B14 (MPDA))	1	5	3	1	10	4=
Land north-east of Send (Site B16 (MPDA))	1	6	5	1	13	6=

**Site Sustainability**

5.2 We consider that the methodology used within the GBCS represents an appropriate approach to establish the sustainability of individual sites and development areas. The table below therefore identifies the sustainability of the sites based on their score as set out within the GBCS. By way of comparison, the rank of each site based on their contribution to the purposes of including land within the Green Belt has also been included:

Table 4 – Sustainability of Individual PDAs / MPDAs

Site	Score <sup>1</sup>	Rank	GB Rank
The Site (Site B16-A)	6	5=	1=
Land between Polesden Lane & Manor Road (Site B16-B)	6	5=	3=
Land between Send Marsh Road, Green Drive, Meadow Drive and Tuckey Grove (Site B15-C)	7	4=	3=
Land South of Burntcommon (Site B13-D)	5.25	6=	1=
Land at Tannery Lane, Send Road, Walnut Tree Place & Maysfield Road (Site B16-Ai)	9.75	1	2=

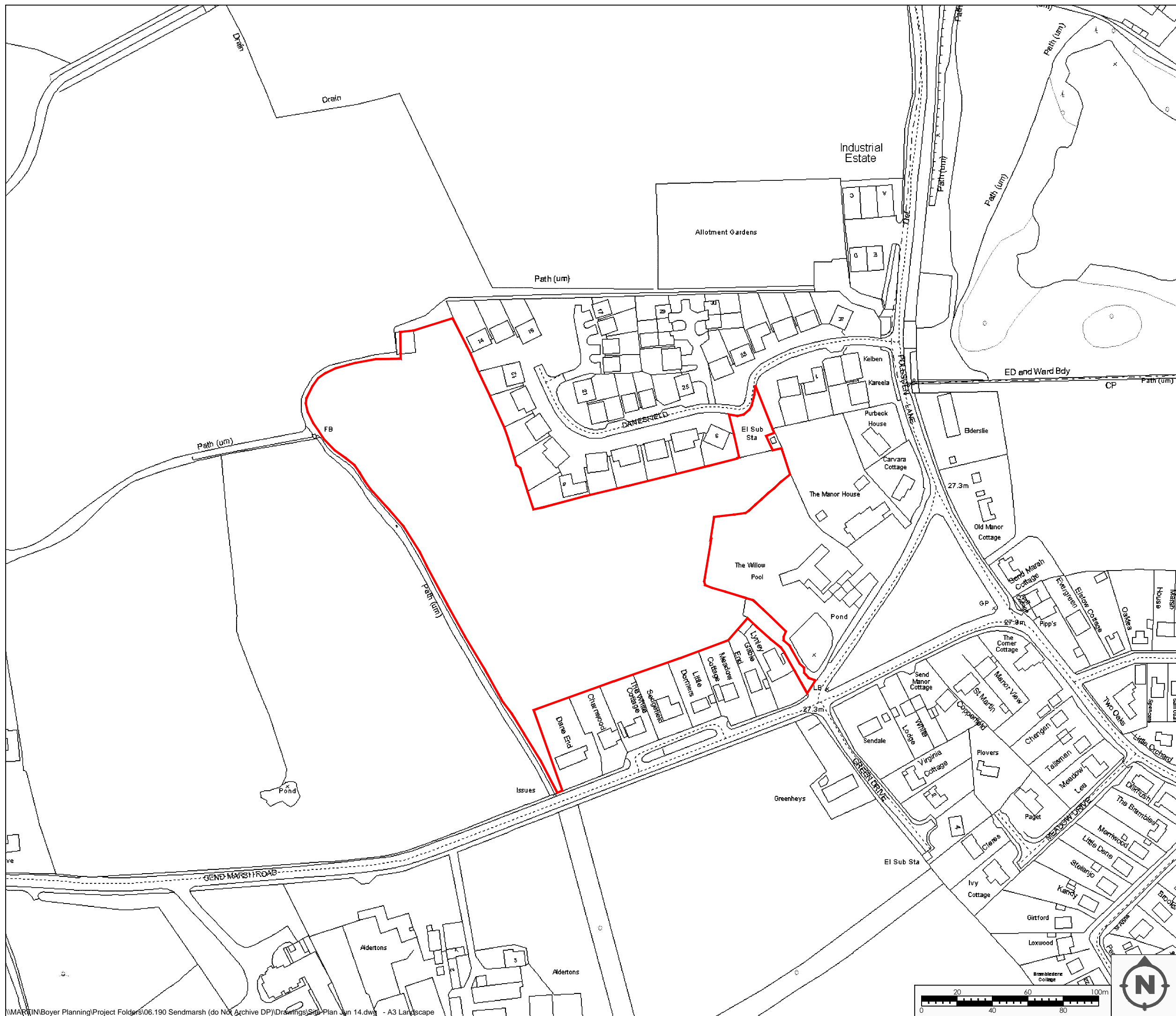
Site	Score <sup>1</sup>	Rank	GB Rank
Land between Sanger Drive, Wharf Lane & Oat Lane (Site B16-Ci)	7	4=	5
Land at Send Hill (Site B10-B)	6	5=	2=
Land south-east of Ripley (Site B16-Aii)	4	7	6=
Land south-west of Send Marsh (Site B12/B13 (MPDA))	9.5	2	4=
Land south-east of Send Marsh (Site B14 (MPDA))	5.25	6=	4=
Land north-east of Send (Site B16 (MPDA))	8.5	3	6=
1- Sustainability score taken from GBCS NB: Rank 1 = highest			

## 6. CONCLUSION

- 6.1 This report has been prepared as part of the on-going promotion of land at Polesden Lane and Send Marsh Road, Send Marsh ('the site'), with the purpose of assessing its contribution to the purposes of including land within the Green Belt, in relation to that of other potential sites.
- 6.2 The site is adjacent to the village settlement boundary to the north, east and south and is therefore largely within the existing village envelope. The smaller part of the northern boundary, and the western boundary, adjoin fields but these boundaries comprise of strong and mature landscaping. This results in the site having an enclosed character that is visually contained and separate from the wider countryside beyond.
- 6.3 The Council are in the process of preparing their emerging Local Plan, which is supported by a number of documents including the SHMA (2015) and GBCS (2013). This report has sought to assist this process after the previous version of the draft Local Plan allocated a number of sites in and around Send and Send Marsh.
- 6.4 Since the publication of the Council's GBCS, guidance on the preparation of Green Belt assessments has been published by the Planning Advisory Service (PAS) whilst more recent assessments carried out by other local authorities have refined the process of assessing land within the Green Belt. This report has followed this guidance and applied what has been learned from other Green Belt reviews to provide a more accurate assessment process that allows for the potential sites/areas previously identified to be compared against each other in order to supplement the findings of the GBCS.
- 6.5 The application of a standardised assessment methodology in this report allows for a quantitative comparison of the identified sites that was not possible based on evidence contained within the GBCS. On this basis, given its characteristics, the site is considered to perform only a very limited contribution, at best, to the purposes of including land within the Green Belt.
- 6.6 As would be expected, the assessment found that smaller PDAs which are much closer to the existing settlement boundary generally provide a much more limited contribution to the Green Belt purposes. In contrast, because of their size, the MPDAs are considered to make a greater contribution to the purposes of including land within the Green Belt.
- 6.7 Overall, when ranked against the other PDAs/MPDAs assessed the site is considered to be joint top together with land south of Burntcommon (site B13-D). Other PDAs, most notably land at Tannery Lane (site B16-Ai), are also highly ranked.
- 6.8 When taking into account sustainability considerations, it is considered that the site has good access to a range of facilities as identified by the Council's GBCS, comparable with other PDAs surrounding Send Marsh and Ripley.

- 6.9 On this basis, we consider that the site makes only a very limited contribution to the purposes of including land within the Green Belt. Furthermore, development of the site would represent a logical extension to Send Marsh whilst also being within easy access of a range of facilities and services. As such, we consider that the site should be released from the Green Belt and allocated for residential development as part of the emerging Local Plan process.

# **APPENDIX ONE – SITE LOCATION PLAN**



**LEGEND**  
 Site Boundary

REV	DATE	DESCRIPTION	DRAWN
B	Jun 2014	First issue	BDC
A	May 2009	First issue	BDC
-	Jul 2008	First issue	BDC

CLIENT  
**Trenfold Property Limited**

PROJECT TITLE  
**LAND AT POLES DON LANE AND SEND MARSH ROAD, SEND MARSH**

DRAWING TITLE  
**SITE PLAN**

DATE	DRAWN	CHECKED	AUTHORISED
JUN 2014	BDC	DP	JM

NUMBER	REV.	SCALE
06.190/001	B	1:2000 @ A3

**Boyer**

cardiff | colchester | london | twickenham | wokingham

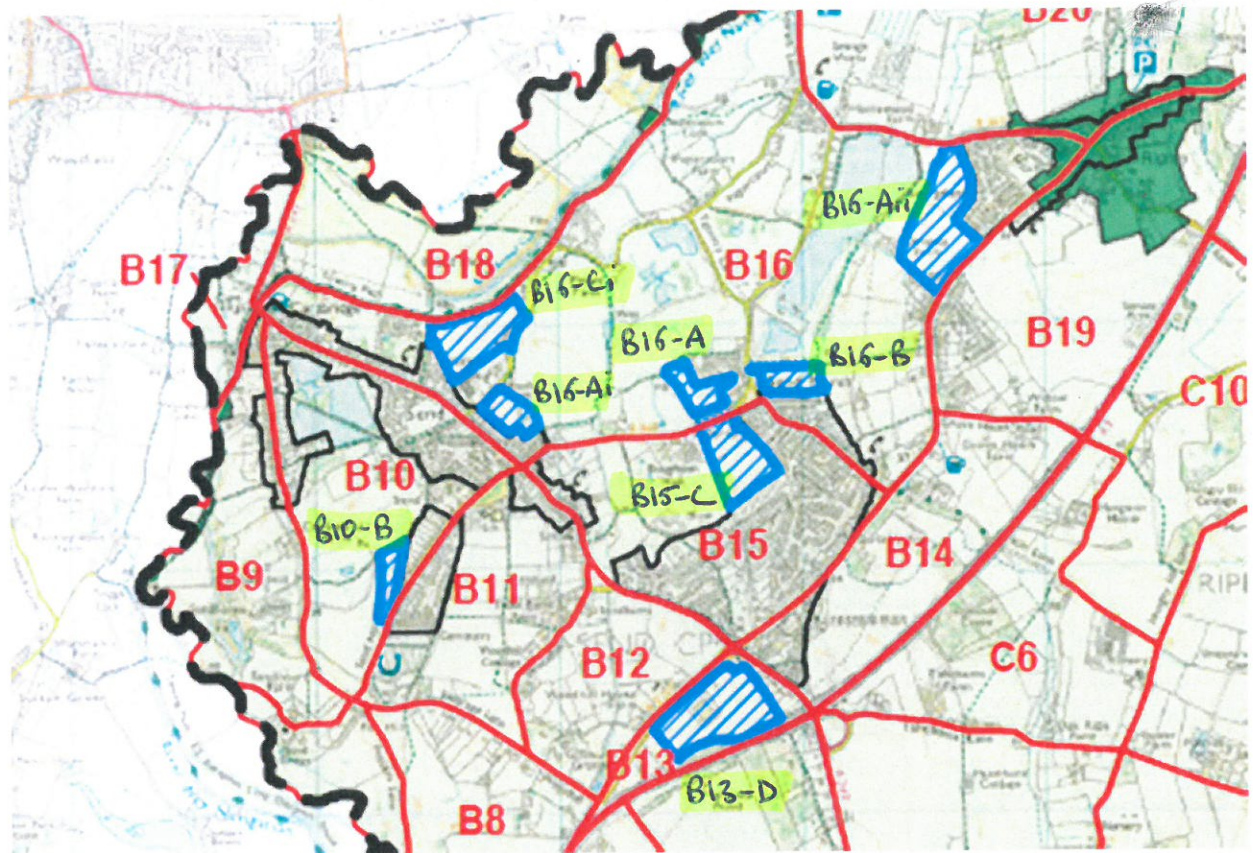
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## **APPENDIX FOUR- PLAN OF PDAS/MPDAS**



Land at Send / Sendmarsh / Ripley to be Assessed - PDAs

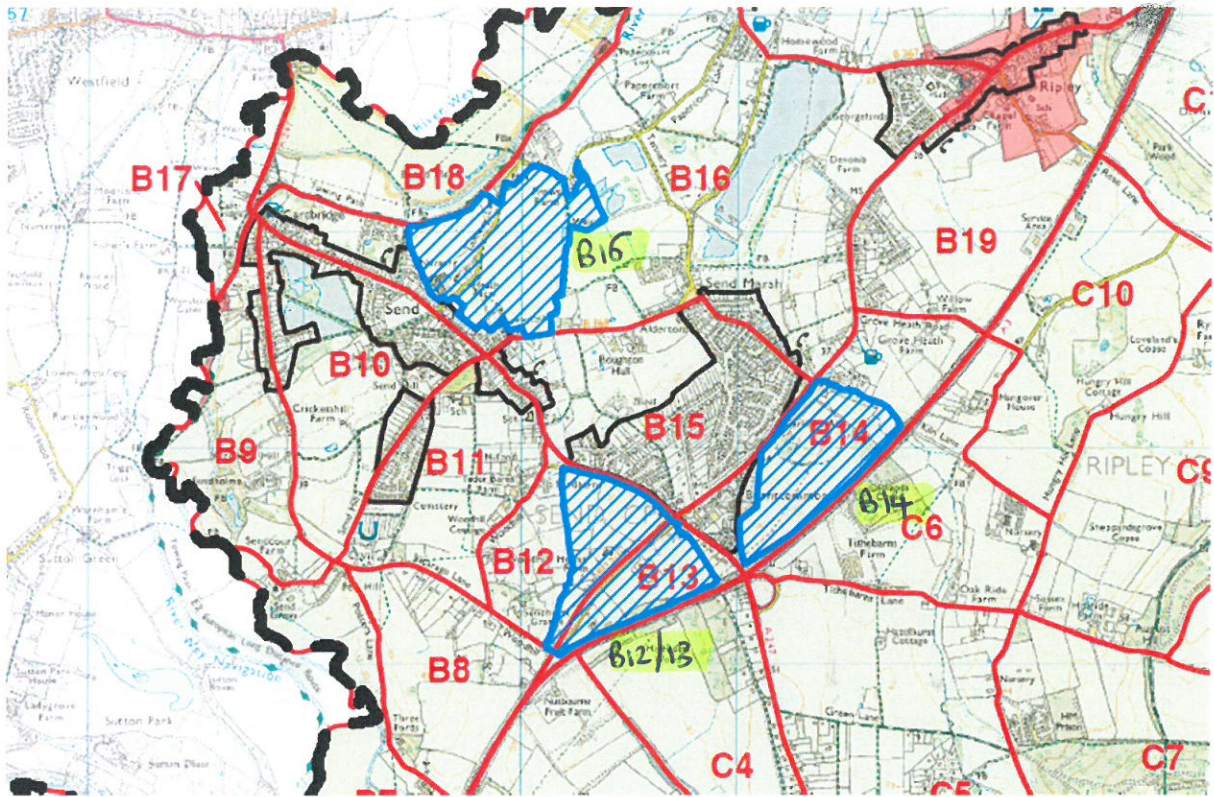


Potential Development Areas (PDAs)		
Settlement	Reference	Site Description
Send Marsh	B16-A	Land at Send Marsh Road, Danesfield & Polesden Lane
	B16-B	Land between Polesden Lane & Manor Road
	B15-C	Land between Send Marsh Road, Green Drive, Meadow Drive and Tuckey Grove
	B13-D	Land South of Burntcommon
Send	B16-Ai	Land at Tannery Lane, Send Road, Walnut Tree Place & Maysfield Road
	B16-Ci	Land between Sanger Drive, Wharf Lane & Oat Lane
	B10-B	Land at Send Hill
Ripley	B16-Aii	Land south-east of Ripley

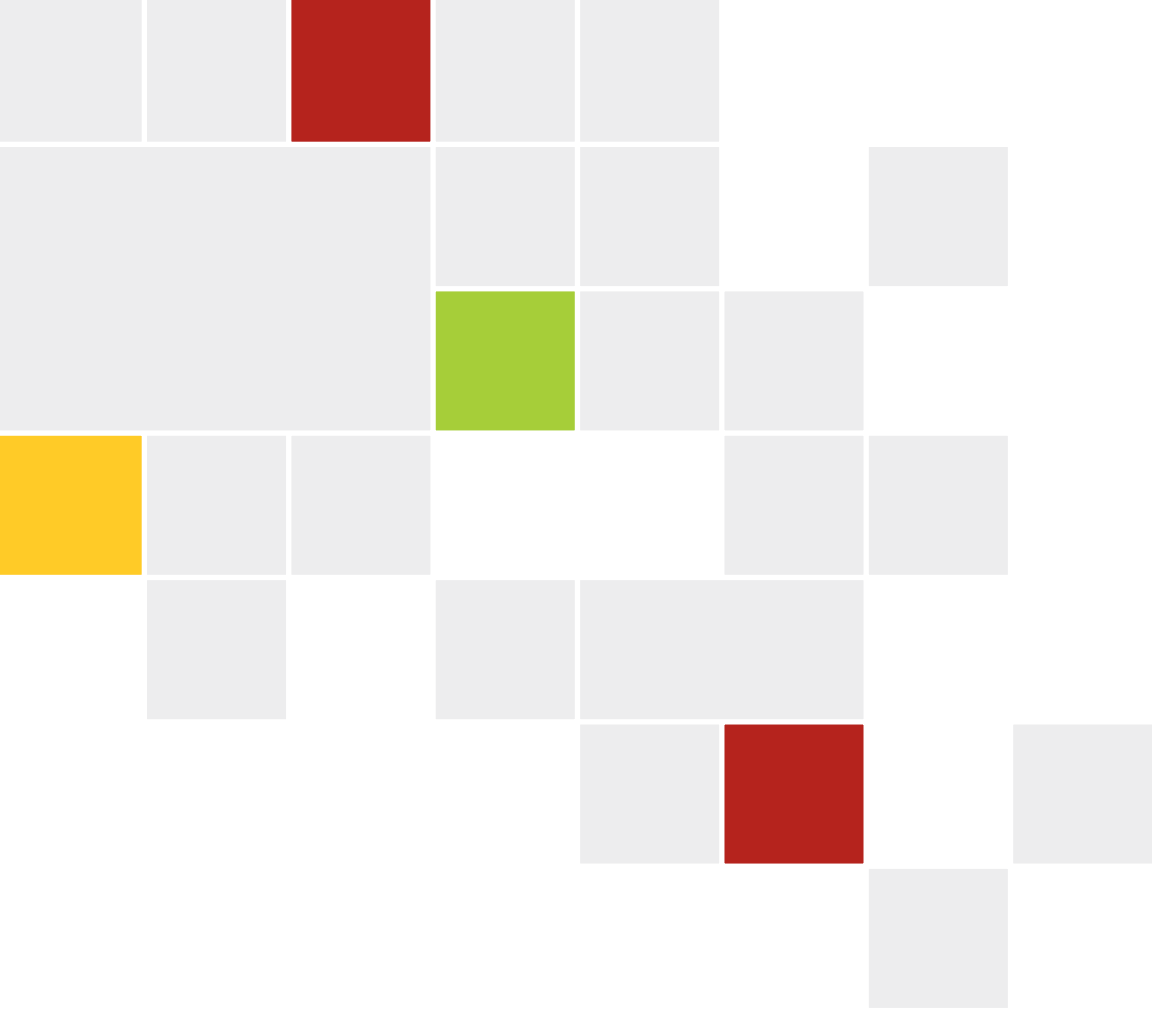




Land at Send / Sendmarsh / Ripley to be Assessed - MPDAs



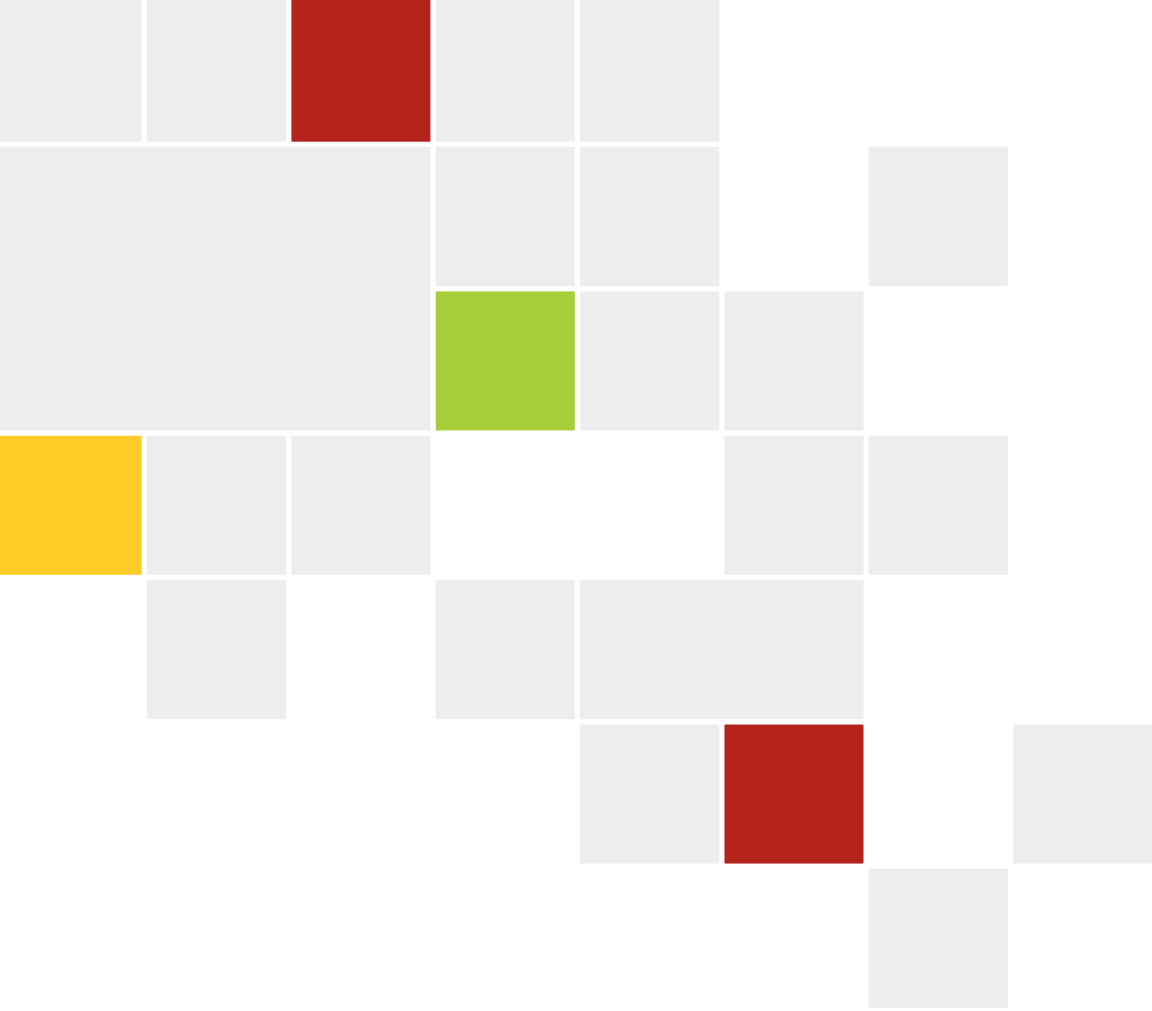
Major Potential Development Areas (MPDAs)		
Settlement	Reference	Site Description
Send Marsh	B12/B13	Land south-west of Send Marsh
	B14	Land south-east of Send Marsh
Send	B16	Land north-east of Send



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