

This Hearing Statement on behalf of Lightwood Strategic responds to the following Matters and Issues in the Inspector's list (ID/3):

2. Calculation of the Objectively-Assessed Need for Housing (OAN)
4. Housing Trajectory
5. Five-Year Housing Land Supply
9. Spatial Strategy, Green Belt and Countryside Protection
11. Site Allocations: A22 (Land north of Keens Lane, Guildford) and A23 (Land North of Salt Box Road, Guildford)

## **2. Calculation of the Objectively Assessed Need for Housing (OAN)**

In Lightwood Strategic's response to the July 2017 Proposed Submission Local Plan we noted that the Local Plan proposals failed to meet the full, objectively-assessed needs (OAN) for market and affordable housing in the housing market area; they failed to identify a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer to ensure choice and competition in the market for land; and they failed to identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15.

It was clear that the plan was not sound as the proposed spatial strategy did not comply with the requirements of paragraph 47 of the NPPF. We did not think it was therefore necessary to challenge in detail the methodology of GL Hearn's Strategic Housing Market Assessment Addendum Report (March 2017) which was fundamentally sound, although there are questions about the use of projections based on past migration trends that have been influenced by recent conditions in the Guildford housing market that were, in turn, influenced by planning policies and decisions.

We agree with the Inspector's question (ID/1) that a significant uplift is necessary in the assessment of housing needs based on projected household formation, in view of the evident problems of housing affordability and their continuing deterioration in the Borough.

The Council's response is that appropriate adjustments were made in the OAN for migration, household headship rates and student numbers, in response to 'market signals' about affordability, and that affordability ratios should be looked at over a longer term. However, there are some nonsensical statements in the Council's response: for example in paragraph 1.7:

*'The SHMA logic was that the Council should be planning for the new houses built to be occupied at the local level. On this basis, upward adjustments within an OAN calculation mean that additional households are required to occupy them. This means either higher net migration or higher household formation within the local authority concerned (SD003 Para 5.46).'*

This paragraph seems to suggest that increases in housing supply would determine trends in migration and household formation that in reality result from a number of underlying demographic, social and economic causes. There is also another incomprehensible statement in paragraph 1.24 about the causes of deteriorating affordability:

*'The solution however is to increase housing delivery looking forwards (as the submitted plan will do), not to adjust the requirement. The under-delivery in the early years of the plan period is made up later on, as the housing trajectory shows.'*

#### **4. Housing Trajectory**

The phasing of the housing trajectory is a major concern about the plan which we identified in our consultation response. The Inspector has also identified this as *'an unacceptable aspect of the plan'*.

There is no attempt in the Plan or in the Council's response to the Inspector to consider the social and economic implications of under-provision or under-delivery of housing in the early years on existing and new households, or whether these impacts can be compensated by increased provision in later years.

The Council's response (paragraph 2.7) cites physical and planning constraints, including Green Belt which covers 89% of the Borough, as *'an extremely challenging backdrop to identifying sufficient sites to meet Guildford's needs, in particular in relation to early delivery.'* As there are insufficient development opportunities within the town and beyond the Green Belt, the Council has recognised that there are *'exceptional circumstances to justify amending Green Belt boundaries.'* The question is not whether amendments to the Green Belt are necessary, but how extensive they need to be and in what locations.

The Council's response (paragraph 2.10) states that *'In addition to seeking to meet its needs, the Council has also taken measures to maximise early delivery. This includes the allocation of a number of smaller Green Belt sites predominantly around villages, which are at the bottom of the spatial hierarchy. An important part of the "exceptional circumstances" justification for these sites is that they are necessary for early delivery as they are all projected to be completed within the first five years.'*

We believe that the Council's spatial strategy has failed to identify sufficient land to meet housing requirements, especially in the early years of the plan, because it has taken an excessively restrictive approach to Green Belt amendments and has relied too heavily on a small number of large sites that cannot deliver sufficient housing in the early years of the plan. In paragraph 2.11 of its response, it states that *'the Council are unable to sustainably accommodate its own full housing requirement in the early years of the plan.'* There is then the remarkable non sequitur: *'this justifies the proposed phased approach to housing delivery contained in Policy S2 of the plan.'*

We would say exactly the opposite: the shortfall of housing land supply in the early years of the plan requires a wholly different approach to the phasing of housing delivery, based on a different spatial strategy. The Council seeks to argue that the plan can be considered to meet its housing requirement, be positively prepared and effective because there is a potential supply of 1,700 homes in excess of the housing requirement of 12,426. Paragraph 2.12 says that this additional provision *'enables the Council to maximise all sustainable development opportunities, particularly those that are able to deliver early, whilst also providing sufficient flexibility should sites not deliver as planned, in accordance with the NPPF.'*

There is no evidence in the SHMA or the Council's response to the Inspector to justify the assertion that additional housing at the end of the plan period will compensate for substantial deficits in housing land for most of the plan period, which would persist until 2029/30 if the SHMA rate of 654 dwellings per annum is applied consistently throughout the plan period.

Even with the Council's *'phased'* or variable housing target in draft Policy S2, there is a continuing shortage of housing land supply until at least 2024/25. The Council has arbitrarily lowered the housing target below 654 dpa in every year between 2019/20 and 2026/27, to reflect expected problems in the provision of infrastructure needed to deliver some of its proposed housing allocations. This *'back-end loading'* in draft Policy S2 is not consistent with the SHMA Addendum's objective assessment of housing needs, the policies of the NPPF or Planning Practice Guidance. With a constant target there is a cumulative deficit in supply until 2027/28.

The Council's approach to housing targets in the revised table with Policy S2, in their response to the Inspector, simply makes no sense. The target of 654 is applied until 2018/19 – prior to adoption of the plan. It then drops by 200 dpa to 450 dpa for two years, and then increases by increments of 50 or 100 dpa throughout the plan period, but does not return to the SHMA requirement of 654 dpa until after 2026.

The Council’s explanation of its approach to housing targets, in paragraph 3.5 of its response to the Inspector, is incomprehensible. The Council seems to believe that varying the annual targets is justified in order to avoid having a deficit in five-year housing land supply. This is an inversion in the usual logic of performance measurement:

*‘Whilst this is currently labelled as the Annual Housing Target, it is important to clarify that this target is not the number of homes projected to be delivered within each of these years. Instead, it is the target number of homes against which delivery will be measured in order to calculate the rolling five year supply of housing.’*

The cumulative picture of housing targets and land supply (which is not shown in the Council’s response to the Inspector) is shown in the table below. The graphs on the following page illustrate housing land supply (a) with the Council’s stepped housing targets and (b) with a constant target of 654 dwellings per annum, based on the SHMA.

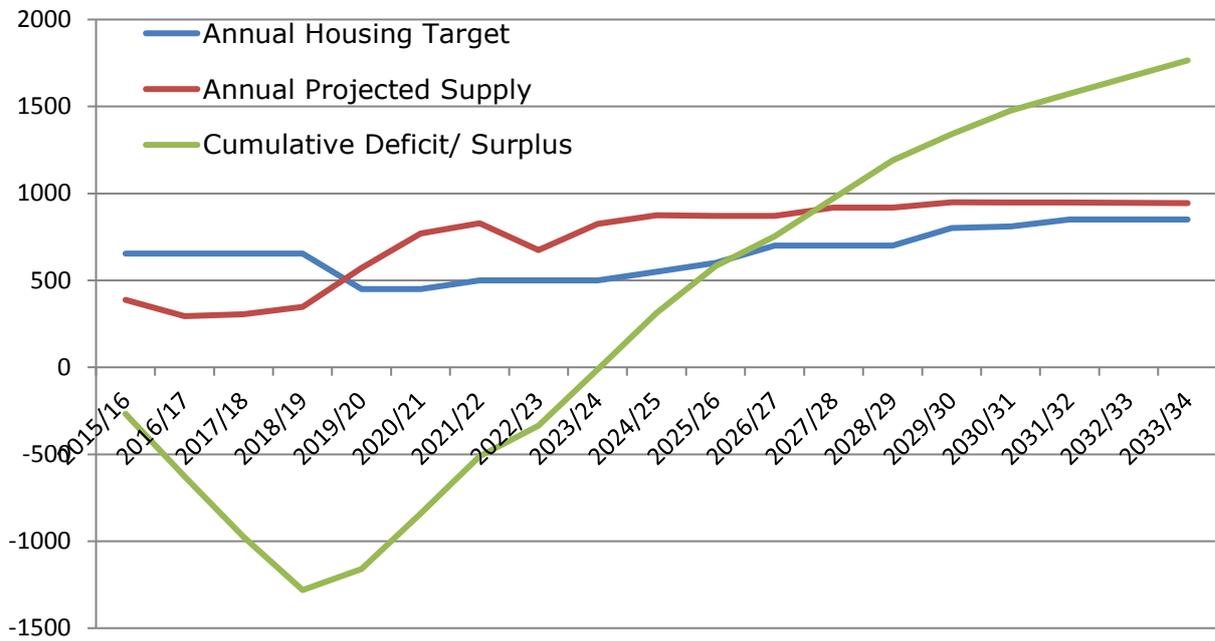
**Table 1: Housing Land Supply based on the Guildford Borough Council’s proposed ‘stepped supply’ targets (Policy S2).**

Year	Annual Housing Target	Cumulative Target	Annual Projected Supply	Cumulative Supply	Cumulative Deficit/ Surplus
2015/16	654	654	387	387	-267
2016/17	654	1308	294	681	-627
2017/18	654	1962	306	987	-975
2018/19	654	2616	348	1335	-1281
2019/20	450	3066	572	1907	-1159
2020/21	450	3516	769	2676	-840
2021/22	500	4016	829	3505	-511
2022/23	500	4516	675	4180	-336
2023/24	500	5016	824	5004	-12
2024/25	550	5566	874	5878	312
2025/26	600	6166	871	6749	583
2026/27	700	6866	870	7619	753
2027/28	700	7566	919	8538	972
2028/29	700	8266	919	9457	1191
2029/30	800	9066	949	10406	1340
2030/31	810	9876	947	11353	1477
2031/32	850	10726	947	12300	1574
2032/33	850	11576	946	13246	1670
2033/34	850	12426	945	14191	1765
<b>Totals</b>	<b>12426</b>		<b>14191</b>		

Source: GBC, Land Availability Assessment, October 2017

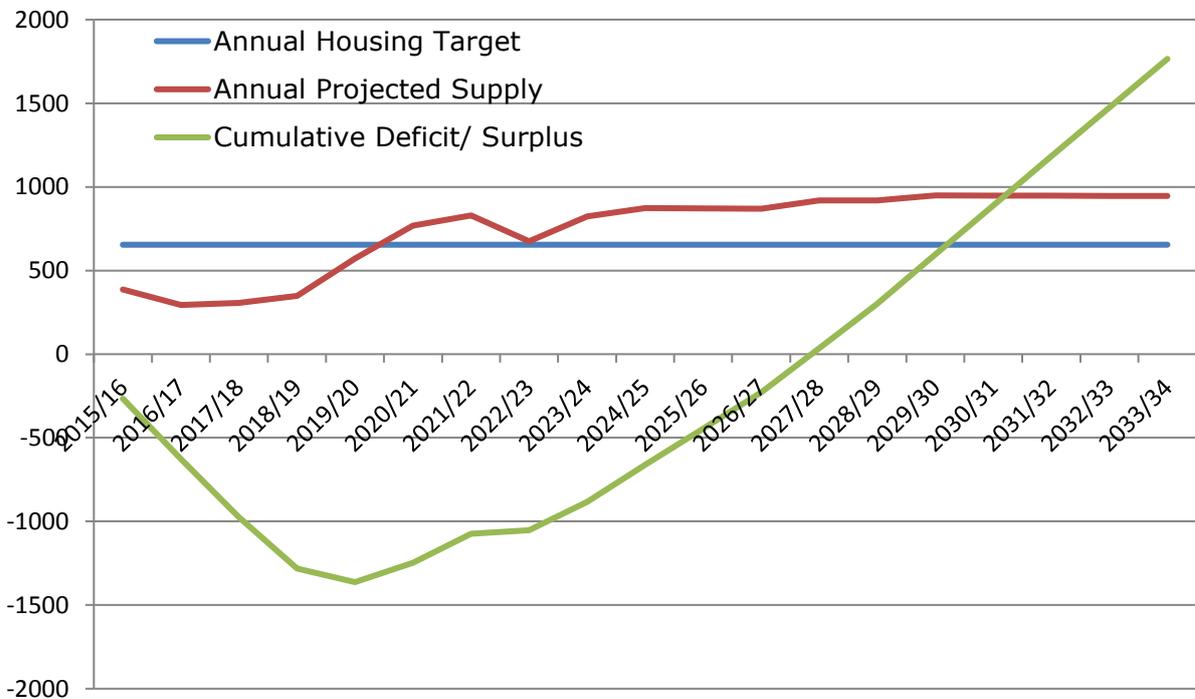
**Housing Land Supply**

**(a) based on the Council’s proposed ‘stepped supply’ targets (Policy S2)**



**Housing Land Supply**

**(b) based on the SHMA target of 654 dpa**



Source: GBC, Land Availability Assessment, October 2017

## **5. Five-Year Housing Land Supply**

The following table is based on the Land Availability Assessment (LAA) of October 2017 and the Council's Response to the Inspector's Question (Question 3 – Appendix 1). It updates the calculations in our submission (*Tangley Place Concept Statement*) which were based on data from the LAA Addendum of June 2017.

The five-year housing land supply from 2017/18 to 2021/22 appears to have increased from 2.36 years to 3.02 years. (The earlier figure still appears in paragraph 3.27 of the Council's Response.) The calculation is presented here because we could not find a similar, explicit presentation of the figures in either of the Council's documents.

**Table 2: Five-Year Housing Land Supply 2017/18 to 2021/22**

<b>Five-Year Housing Land Supply Calculation</b>	<b>Dwellings</b>	<b>Years</b>
1 Basic Annual Requirement	654	
2 Basic Five-Year Requirement	3270	
3 Backlog from 2015/16 and 2016/17	627	
4 Five-Year Requirement from 2017/18 with Backlog	3897	
5 Five-Year Requirement with Backlog plus 20% Buffer	4676	
8 Total Five-Year Supply	2824	
9 Deficit in Five-Year Supply	-1852	
10 Number of Years' Supply		3.02

*Source: GBC, Land Availability Assessment, October 2017*

It is clear that the plan fails to meet the requirements of paragraph 47 of the NPPF: to identify a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% or 20% where there has been a record of persistent under delivery of housing.

The Council's Response to the Inspector's Question does not provide a clear, explicit account of the five-year supply of housing land and declines to provide an amended trajectory. It presents a confusing explanation of the Council's approach which often appears to be inconsistent; for example the summary on page 21 includes the following contradictory statements:

*'The Annual Housing Target in Policy S2 is significantly lower than the projected number of homes that is expected to be delivered each year...'*

*'The proposed housing trajectory is considered to be realistic and deliverable.'*

*'...the Council has taken positive steps to maximising early delivery such as allocating numerous small Green Belt sites that can all deliver early.'*

*'Guildford Borough Council has submitted a plan that seeks to meet housing need but for justifiable reasons this will need to be back loaded to a degree.'*

Much of the response to Question 3 of the Inspector's Questions is an attempt to justify the failure to meet the objectively-assessed need for housing throughout much of the plan period. The Council's *'stepped trajectory'* amounts to varying the housing targets to match the failings in housing delivery due to an ineffective spatial strategy and an attempt to disguise the plan's failure to meet the requirements of paragraph 47 in the NPPF for housing delivery in successive 5-year phases of the plan.

The attempt to justify this approach is specious and disingenuous. Paragraph 3.2 states:

*'Whilst this (the Annual Housing Target in Policy S2) is currently labelled as the Annual Housing Target, it is important to clarify that this target is not the number of homes projected to be delivered within each of these years. Instead, it is the target number of homes against which delivery will be measured in order to calculate the rolling five year supply of housing.'*

Paragraph 3.47 adds:

*'As set out above, the reason why the annual housing target is so much lower than the actual delivery is projected to be is so that the oversupply each year (delivery over and above the 'annual housing target') can contribute towards meeting the undersupply that has been accrued since the beginning of the plan period (approximately 2 years' worth of housing or 1,300 homes). The backlog is further compounded by the requirement to build in a 20% buffer, in accordance with the NPPF given the persistent past under-delivery (approximately another 1.5 years' worth of supply or almost 1,000 homes). In total the first six years of the plan post-adoption is projected to deliver 1,600 more homes than the sum of the annual housing target for this same period.'*

Guildford Borough Council believes that it is acceptable to produce an annual housing target that is not related to the objective assessment of housing need and not related to realistic assessments of housing delivery, but is contrived simply to avoid a failure to meet the target for five-year housing land supply.

We are not altogether clear about the significance of the table in paragraph 3.13. It purports to demonstrate the impossibility of addressing the backlog from the first two years of the plan within the following 5 years, but there is nothing inevitable about that conclusion. A more relevant conclusion, if the Council were positively seeking opportunities to meet the development needs of their area, in accordance with paragraph 14 of the

NPPF, would be to review the spatial strategy with the aim of identifying options for sustainable development that can increase the delivery of housing within the first five years of the plan. The Council merely reiterates, in paragraphs 3.15 to 3.50, why it considers that it is too difficult to meet housing requirements as they arise within the first 12 years of the plan, based on the SHMA requirement of 654 dwellings per annum (or 8 years, based on the Council's proposed *'stepped targets'*).

In paragraphs 3.49 and 3.50 of its response to Question 3, the Council suggests that the backlog of housing delivery from the first two years of the plan (1,300 homes) cannot be restored within the first five years of the Plan (the Sedgefield method) or even over the whole remaining plan period (the Liverpool method). That is their justification for proposing the *'stepped housing target'* (combined with the Liverpool approach to backlog) which imposes further delay in meeting the objectively-assessed need for housing.

The demographic, social and economic implications of the Council's approach to housing land supply are not considered; for example the impacts on housing affordability, on the life chances of young people hoping to form new households, live independently and start families, or the impacts of housing costs and shortages on labour supply in the local economy. These implications require serious consideration to be weighed against the perceived disadvantages of further amendments to Green Belt boundaries, in accordance with paragraph 84 of the NPPF.

In our view there are significant opportunities to increase the supply of housing within the first five years of the plan on the edge of the built-up area of Guildford and in sustainable village locations within the Green Belt.

## **9. Spatial Strategy, Green Belt and Countryside Protection**

The fundamental problem with housing land supply in the Local Plan is the result of the spatial strategy and the approach to Green Belt review. Paragraphs 3.15 to 3.19 of the Council's Response to the Inspector's Questions explain the limitations of various development options.

Sites within Guildford town centre, sites in the urban areas of Guildford, Ash and Tongham, sites within identified and inset villages, and the redevelopment of previously developed sites in the Green Belt are said to be capable of accommodating only 6,921 homes or 56% of the objectively assessed need for housing.

The next set of options considered were (beyond the Green Belt) an urban extension at Ash and Tongham and (within the Green Belt) Guildford urban extensions, a new settlement at the former Wisley airfield, and development around villages. The Council

prioritised strategic sites, including Guildford urban extensions and a new settlement over village extensions.

Whilst we can appreciate the reasons for these priorities, in terms of sustainability and opportunities for mixed uses, development options also need to be considered in terms of what housing they can deliver especially in the early years of the plan.

The Council places great emphasis on the Green Belt and Countryside Study which it says was prepared over a number of years (paragraph 3.19). It says that the study '*does not seek to identify a specific level of development*'.

In our view the conclusions of that Study, particularly in relation to Green Belt, should have been re-evaluated in the context of subsequent information on housing requirements, housing land supply and the availability of alternative locations, as the weight to be given to maintaining existing Green Belt boundaries should be balanced against the need for sustainable development. That is implicit in the requirements for Green Belt review in paragraph 84 of the NPPF:

*'When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.'*

Striking an appropriate balance between Green Belt and sustainable patterns of development can be achieved only on the basis of specific development requirements and specific locations.

We appreciate that the purposes of the Examination hearings do not include the consideration of unallocated, 'omission sites'. However, to illustrate the potential and need for change in the locational strategy, especially in sustainable village locations within the Green Belt, we have attached as **APPENDIX 1** a critique by Lightwood Strategic of the Green Belt and Countryside Study in relation to a number of Green Belt villages including Normandy and Flexford, Fairlands, Pirbright, Wood Street Village and Ripley. (This critique was originally presented in response to the Local Plan Issues and Options consultation of November 2013.)

The appendix includes, as an illustration of the potential for sustainable development in a Green Belt village, and of the need to review conclusions based on the Green Belt and Countryside Study, a site to the west of Wood Street Village. Site H7-A was identified in Volume III of the Green Belt and Countryside Study) as '*surrounded by defensible boundaries*'. Lightwood Strategic has prepared a Concept Statement that demonstrates

the potential of this site to deliver sustainable development including up to 95 homes without significant harm to the purposes of the Green Belt.

The exceptional circumstances that justify the release of this site and others from the Green Belt are the shortages of housing land that will result, especially in the first half of the plan period unless this site and others like it are released in a carefully considered review of Green Belt boundaries that gives more weight to the need for additional housing sites in sustainable locations. The Council has already demonstrated through this draft Local Plan that it has '*examined fully all other reasonable options for meeting its identified need for development*', the test proposed in paragraph 136 of the draft review of the National Planning Policy Framework (March 2018). Further changes to the Green Belt are justified and inescapable.

## **APPENDIX**

**Guildford Local Plan Examination: This document is an appendix to the Hearing Statement on behalf of Lightwood Strategic (Respondent No: REP/17415009)**

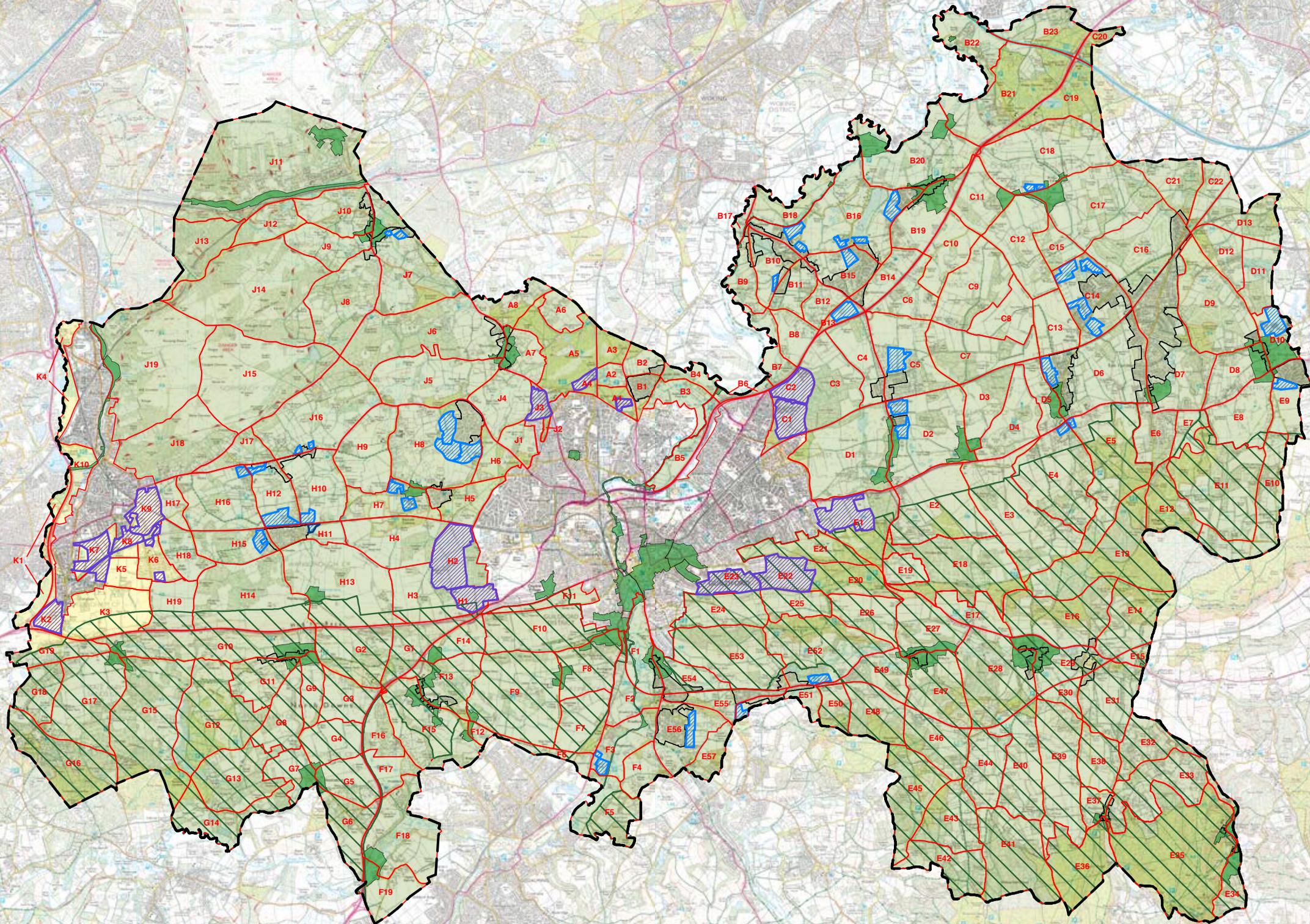


# Guildford Borough Council

## Response to Local Plan Strategy and Sites Issues and Options

NOVEMBER 2013

lightwoodPLANNING



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# Part One

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## 1.0 Introduction

1.1 This document is responding to the Issue & Options consultation process currently being undertaken by Guildford Borough Council (GBC) in preparation of their new Local Plan.

1.2 It is specifically responding to the issues and options relating to ‘Land surrounding Villages’ and that land has been excluded from consideration because it does not adjoin potential village settlement boundaries. (Question 20- clause 7.3, Question 29- clause 9.52 & Question 31- clause 9.57).

1.3 GBC should be adopting a methodology that is aligned with the NPPF which prioritises the inclusion of sustainable development (para 49) and therefore the methodology should prioritise the expansion of settlements according to the ‘Guildford Borough Settlement Hierarchy’ (June 2013).

1.4 The Settlement Hierarchy study concludes (para 6.1.5) that ‘Directing growth to these settlements is in accordance with national policy which states that planning policy should actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling and further focus significant development in

locations which are, or can be made sustainable.’

1.5 Guildford Borough Council commissioned Pegasus Planning Group to produce ‘The Greenbelt and Countryside Study’ (GBCS) ; an independent assessment of Guildford Borough’s Green Belt and Countryside beyond the Green Belt, with a view to potential release for development purposes in the longer-term should this be necessary within the GDF plan period - 2006-2026 (and up to 2031), identifying realistic sustainable location(s) for green field release.

1.6 Volume IV of the study assessed the potential for the inseting of villages across Guildford Borough within the green belt, and the identification of new green belt boundaries if it was considered appropriate to inset a particular village in accordance with the National Planning Policy Framework (NPPF).

## 2.0 Purpose of the Document

2.1 We believe that the consultants employed by Guildford Borough Council (GBC) have produced a flawed series of documents within the Greenbelt and Countryside Study. In accepting such work as sound, GBC have in turn made flawed decisions based on inconsistent methodologies and have followed an illogical decision making process when deciding on the suitability of development sites.

2.2 This document has been designed to identify the flaws in both the overall approach by GBC when assessing sites suitable for development but more specifically has also identified flaws in Volume IV of the GBCS report which in our opinion has deviated from the guidance offered in the NPPF and created a highly challengeable result.

2.3 We have reapplied the consultants methodology when assessing the opportunities within the larger villages surrounding Guildford and in line with the NPPF focused on proposing sustainable development in sustainable locations

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## 3.0 National Planning Policy Framework (NPPF)

3.1 The NPPF introduced a ‘presumption in favour of sustainable development’ with such consideration forming the heart of the planning decision making process (paragraph 14). It states within paragraph 85 that ‘when defining boundaries, local planning authorities should ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development, satisfy themselves that green belt boundaries will not need to be altered at the end of the development plan period and define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.’

3.2 The NPPF states that (paragraph 49) Housing applications should be considered in the context of the presumption in favour of sustainable development.. [and] ..relevant policies for the supply of housing should not be considered up to date if the local planning authority cannot demonstrate a five year supply of deliverable housing sites.

3.3 Clearly the exercise currently being undertaken by GBC is to ensure, in line with

paragraph 47 of the NPPF, the boost of the supply of housing is achieved so that housing supply can be delivered.

3.4 It is vital when undertaking any assessment of sites through the SHLAA, or more importantly when making assessments of the ability to include or exclude rural villages within or outside the green belt, that any planning should accommodate a growth need equal to a 6-10 year and “where possible for years 11-15” (NPPF Paragraph 47).

3.5 Not only does the NPPF specify the need to create and focus on the delivery and expansion of sustainable communities but it also advocates that Local Planning Authorities (LPAs) should positively plan for them. Para 70 states; “To deliver the social, recreational and cultural facilities and services the community needs, planning policies decisions should plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments ...”

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## 4.0 Critique of the Green Belt & Countryside Study

4.1 As identified within the NPPF any exercise that considers moving settlement boundaries within the green belt should be afforded a degree of longevity to ensure that the exercise does not have to be repeated again in the short to medium term.

4.2 In order of priority the NPPF asserts that the delivery of housing as part of sustainable development has the highest ranking priority within its definitions. Accordingly the protection of green belt is outweighed by the need for a LPA to demonstrate a housing delivery plan through a housing trajectory for the plan period and ideally beyond.

4.3 Release of green belt and any assessments that consider the release of it should attach greater weight to enable a larger supply of housing within sustainable locations rather than limiting the availability of sustainable development by trying to protect the green belt. In short, there is little point in conducting a green belt and countryside study if it does not provide the adequate result; namely identifying opportunities to extend settlements,

using a consistent approach with a presumption in favour of creating opportunity for sustainable development.

4.4 Within Volume IV, greater regard should have been given to ‘Guildford Borough Settlement Hierarchy’ (July 2013), which forms a key part of the new Local Plan evidence base, by understanding the sustainability of each settlement, when assessing their suitability and ability to accommodate additional growth.

4.5 Greater ‘presumption in favour of development’ should have been awarded to the higher ranking settlements which should have translated into a widening or redefining of settlements to further accommodate growth and increase sustainability.

4.6 The process therefore should have followed the logical steps;

i) Settlement Hierarchy Study identifying the sustainability of urban and village locations ranking them in order of sustainability

ii) Establish a Green Belt & Countryside Study to enable a greater understanding of the possible

expansion of settlements with a greater emphasis placed on the sustainability of each location.

iii) Ensure that a consistent methodology is applied when reviewing settlement boundaries and ensure that boundaries are protected by features that are “likely to be permanent”.

iv) Reconsider suitable and available sites within the context of their proximity and inclusion within redefined settlements and favouring those that are in sustainable locations namely; Guildford Ash & Tongham urban areas (Urban Areas) and East Horsley (Semi-Urban Village) and then the hierarchy of Large Villages;

1. Normandy & Flexford
2. Fairlands
3. Pirbright
4. Wood Street Village
5. Ripley

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## 5.0 Critique of the Volume IV- Insetting of villages

5.1 In order to establish potential new green belt boundaries the detailed locations of defensible green belt boundaries surrounding each village, defined by the perceived village boundary and comprising woodlands, hedgerows, treebelts, highway and railway infrastructure, were mapped and their extent surveyed.

5.2 Having defined these defensible green belt boundaries at the extent of the perceived village boundary (Stage 2), the study goes on to map the recommended boundary for insetting (Stage 3), which in many cases does not follow the boundaries defined in Stage 2 but rather lies well within the perceived village boundary with no justification given for the placement of these boundaries other than by the definition that the line follows a physical feature regardless of its permanence.

5.3 A number of inconsistencies in the application of the methodology is evident whereby an identified boundary feature is considered acceptable in one location but not in others resulting in a heterogeneous set of settlement boundaries.

5.4 As the placement of the proposed insetting boundary is arbitrary it is possible to apply the same methodology and produce an entirely different insetting boundary;

### 5.5 East Horsley

The proposed boundary to the north-west of the village has been extended to include the residential area beyond bordered by the treebelt located to the east of Ockham Road North (3A) and woodland following Green Lane and Waterloo Farm (3Y). However it has not been extended to include the residential area to the south of the village bordered by the Outdowns Plantation located to the east of Green Dene (2K), Oldlands Wood located to the South of Green Dene & Chalk Lane (2L) and Green Dene Plantation (2M). Both areas are bordered by identifiable defensible boundaries and therefore both should be included within the insetting boundary.

### 5.6 Normandy

The boundary to the north-east of the village has been extended to the treebelt located between woodland at Normandy Common and Anchor Copse (3C) and treebelt to the west of Anchor Copse (3D). Stage 2 identified the treebelt located to the south of

Normandy community centre (2D) as a defensible boundary yet the boundary line has not been extended. Given that the treebelt to the north-east is deemed a suitable boundary then by default the same should apply to the treebelt to the south.

### 5.7 Flexford

Part of the residential area to the south west of the village (to the north of Brickyard Copse) has been included in the insetting boundary. No defensible boundaries have been identified adjacent to the new boundary to justify its placement and therefore there is no logical reason why this ribbon extension should be included. The natural assertion following its inclusion is that the boundary features identified with residential curtilage are, according to the authors of the report, a suitable definition of a defensible boundary.

### 5.8 Wood Street Village

The east of the village has been extended to the access road to Dunmore Farm (3B). To the west of the village beyond the hedgerow to the east of Russell Place Farm (2T) is the access road to Russell Place Farm. By virtue of the fact that an access road acts as the eastern boundary, the same could be said of the western boundary.

## 5.9 Ripley

Figure 1 shows that the inseting boundary to the south of the village has been extended to woodland located between the High Street and the A3 Ripley Bypass (3D), the treebelt located to the south of White Horse Lane and White Hart Meadows (3E), and the hedgerows and fencelines located to the north of the school playing fields to the west of rose lane (3F). Stage 2 identified the woodland and treebelt located to the south of the residential property and allotments on Rose Lane (2F) and hedgerows located to the south of the school playing fields to the west of Rose Lane (2G) as a defensible boundary and therefore the southern boundary could well have been extended to this point as illustrated in Figure 2.

Furthermore the inseting boundary at Fairlands was extended to incorporate both the playing fields of Worplesdon County Primary School to the south of the village and the playing fields associated with the Community Centre to the west of the village and therefore there is no reason that the playing fields associated with Ripley Court School could not be included in the inseting boundary for Ripley.

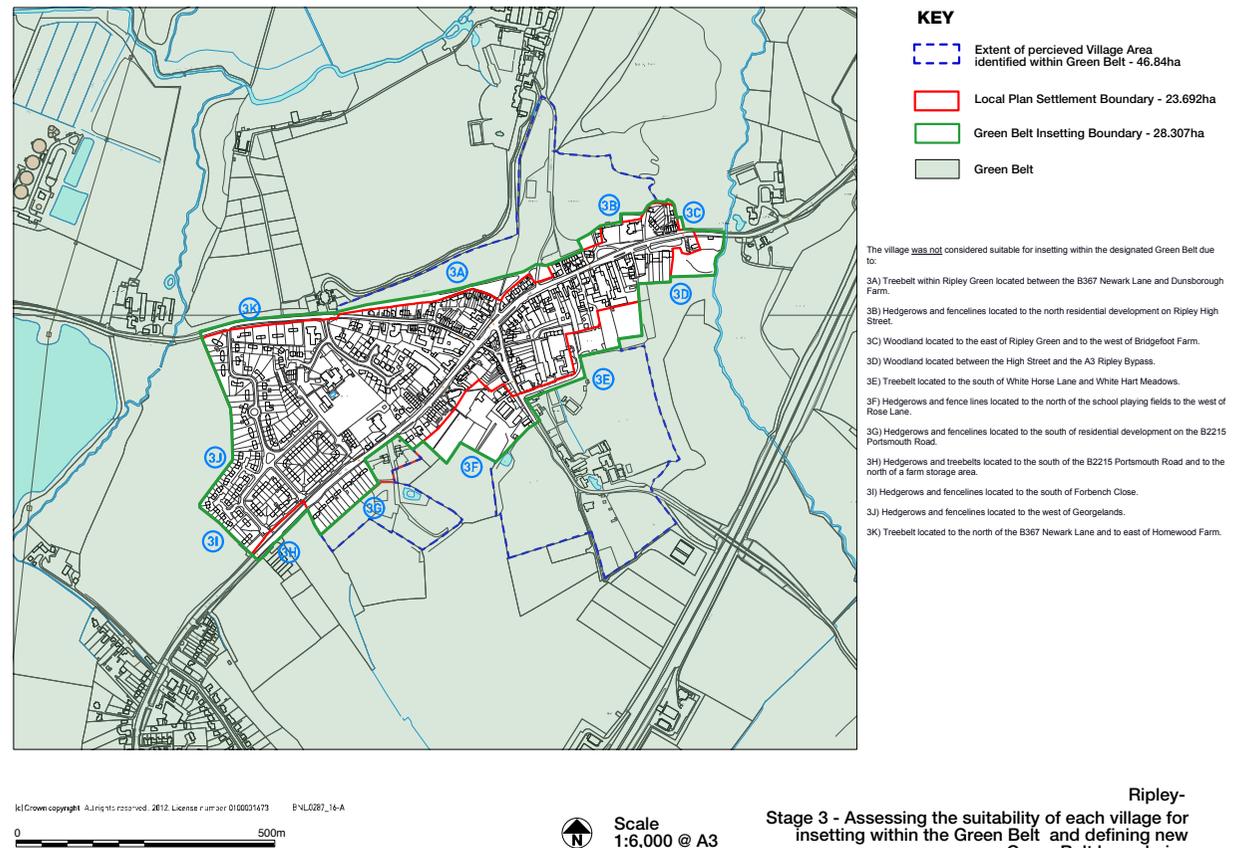
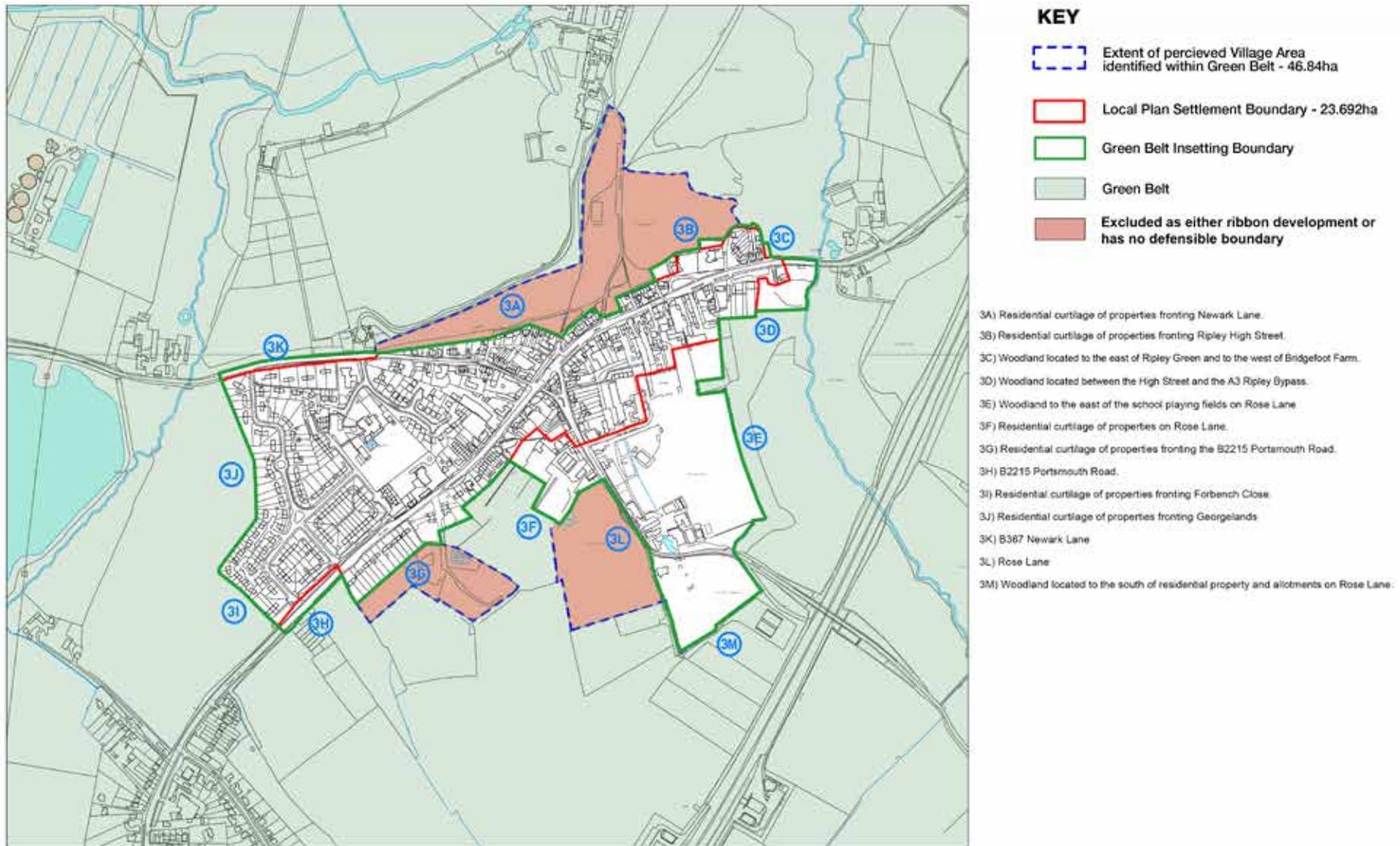


Figure 1. Excerpt from GBCS- Volume IV- Inseting of Villages and Defining New Green Belt boundaries in relation to Ripley



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Scale 1:6,000 @ A3

Ripley  
Proposed Green Belt Insetting Boundary

Figure 2. Example of how methodology can be applied with different result

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5.10 Within Volume IV, the criterion selected for establishing the new boundaries was inconsistent, arbitrary and at odds with the NPPF's guidance that boundaries should have a likelihood of permanence.

5.11 The resulting conclusion has produced a heterogeneous set of settlement boundaries that have no justification or commonality in their conclusion and therefore the approach is flawed.

## 6.0 Lightwood Methodology

6.1 The NPPF states (paragraph 85) when defining boundaries, local planning authorities should, "define boundaries clearly, using physical features that are readily recognisable and likely to be permanent."

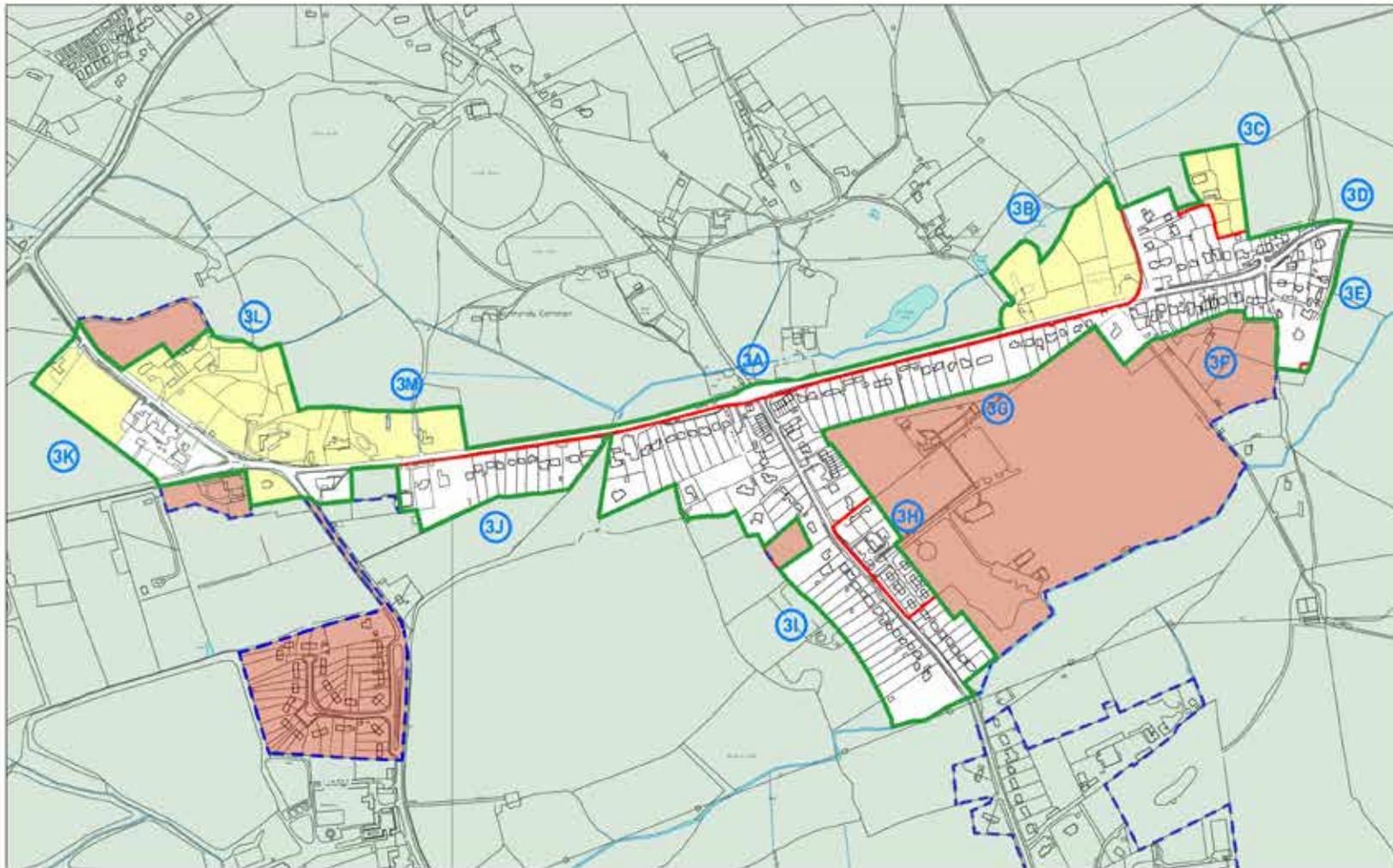
6.2 Our approach to the process was to reassess the definition of defensible boundaries giving greater consideration to their likelihood of permanence.

6.3 We considered a 'likely to be permanent' feature as being either;

- i) A building
- ii) A constructed boundary defining the curtilage of a property
- iii) A road or railway
- iv) A woodland

6.4 Having redefined what constitutes a defensible green belt boundary we then reconsidered the extent to which settlements within the top five ranked villages of the 'Guildford Borough Settlement Hierarchy' (June 2013) could be extended to provide development opportunity contained within a defensible boundary so as to limit the impact on the green belt. Our proposed boundaries are also contained within what is considered to be 'the perceived village boundary' and excluded 'ribbon development' that we judged, in isolation, to be transient and an ineffective protector of the surrounding green belt.

6.5 The following maps show the application of our methodology in relation to the top five ranked villages. They not only identify potential development areas but also give a measurement of such areas and thereby allowing a rough judgement to be made about the proposed extensions contribution to housing numbers at a density of 30 dwellings per hectare.



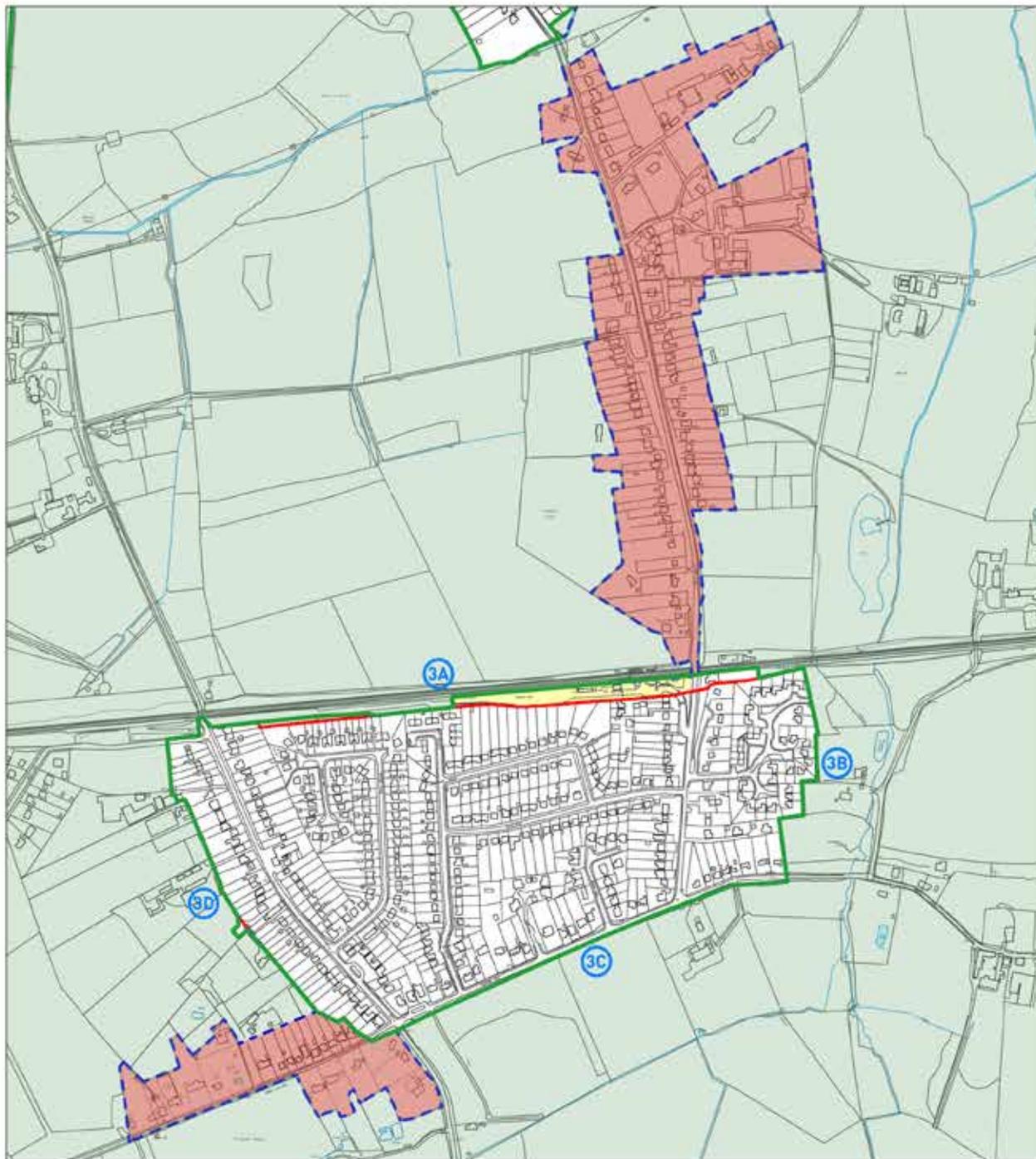
**KEY**

- Extent of perceived Village Area identified within Green Belt - 45.825ha
- Local Plan Settlement Boundary - 15.558ha
- Green Belt Insetting Boundary
- Green Belt
- Excluded as either ribbon development or has no defensible boundary
- Development Area = 7.514ha  
7.514ha @ 30dph= 225 units

- 3A) The A323 Guildford Road and woodland at Normandy Common.
- 3B) Woodland at Normandy Common to north of residential curtilage of Cottage Farm.
- 3C) Residential curtilage of properties to north of Guildford Road.
- 3D) Woodland at Anchor Copse.
- 3E) Residential curtilage of properties on Wells Lane.
- 3F) Woodland located at Walden's Copse to the west of Glaziers Lane
- 3G) Residential curtilage of properties to south of Guildford Road
- 3H) Residential curtilage of properties to east of Glaziers Lane

- 3I) Residential curtilage of properties to west of Glaziers Lane
- 3J) Residential curtilage of properties to south of Guildford Road.
- 3K) Woodland to west of Wyke Primary School.
- 3L) Residential curtilage of Roughs Farm.
- 3M) Residential curtilage of Wyke Lodge & Wyke Cottage.





**KEY**

- Extent of perceived Village Area identified within Green Belt - 46.539ha
- Local Plan Settlement Boundary - 27.557ha
- Green Belt Insetting Boundary
- Green Belt
- Excluded as either ribbon development or has no defensible boundary
- Development Area = 0.583ha  
0.583ha @ 30dph= 17 units

3A) Railway line to the north of Orchard Way, Orchard Close, Szabo Crescent, Christmas Pie Avenue, Cull's Road and The Paddocks.

3B) Residential curtilage of properties on The Paddocks.

3C) Flexford Road.

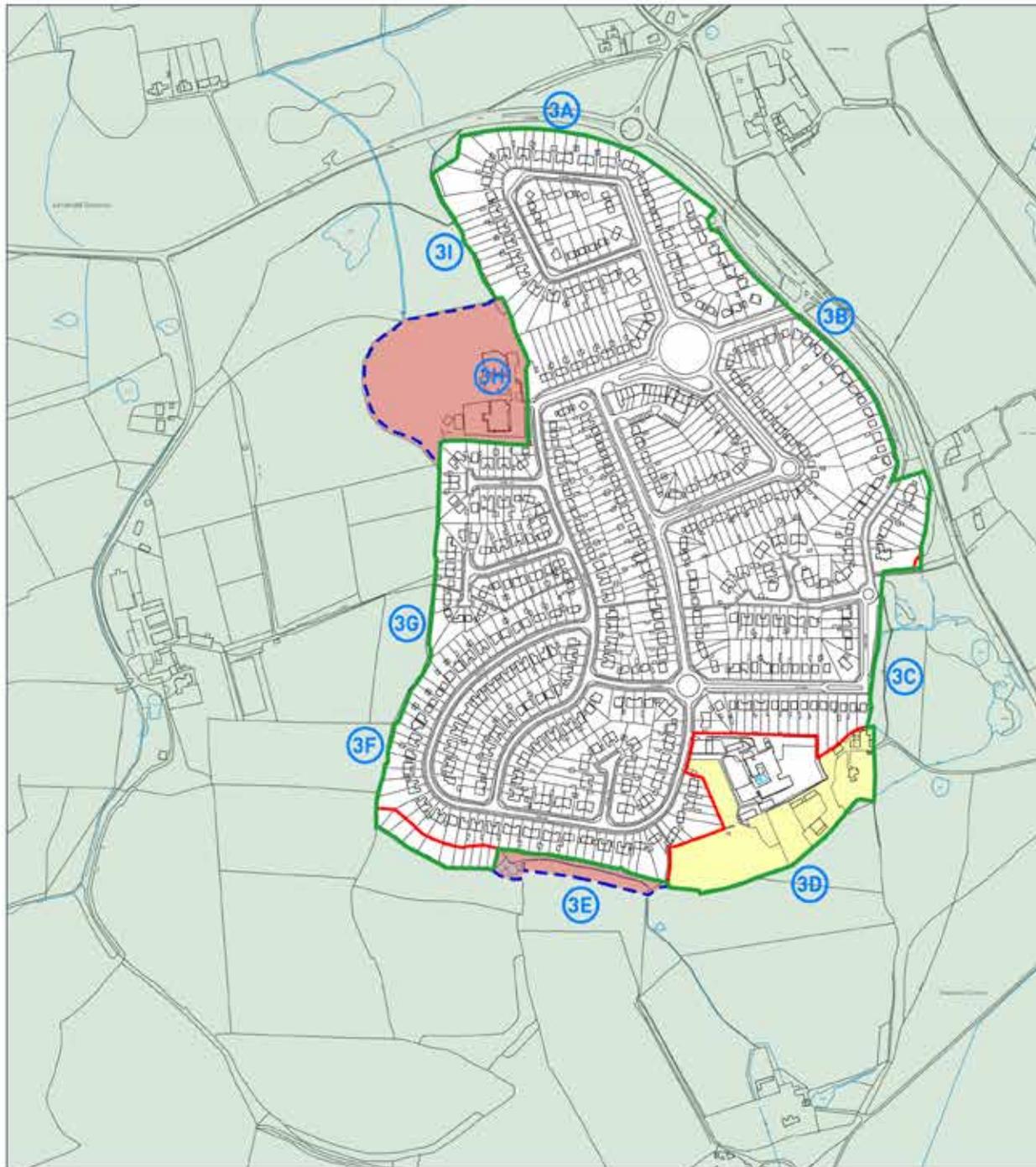
3D) Residential curtilage of properties fronting Westwood Lane

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Scale  
1:6,000 @ A3

**Flexford**  
Proposed Green Belt Insetting Boundary



**KEY**

- Extent of perceived Village Area identified within Green Belt - 38.144ha
- Local Plan Settlement Boundary - 32.255ha
- Green Belt Insetting Boundary
- Green Belt
- Excluded as either ribbon development or has no defensible boundary
- Development Area = 1.842ha  
1.842ha @ 30dph= 55 units

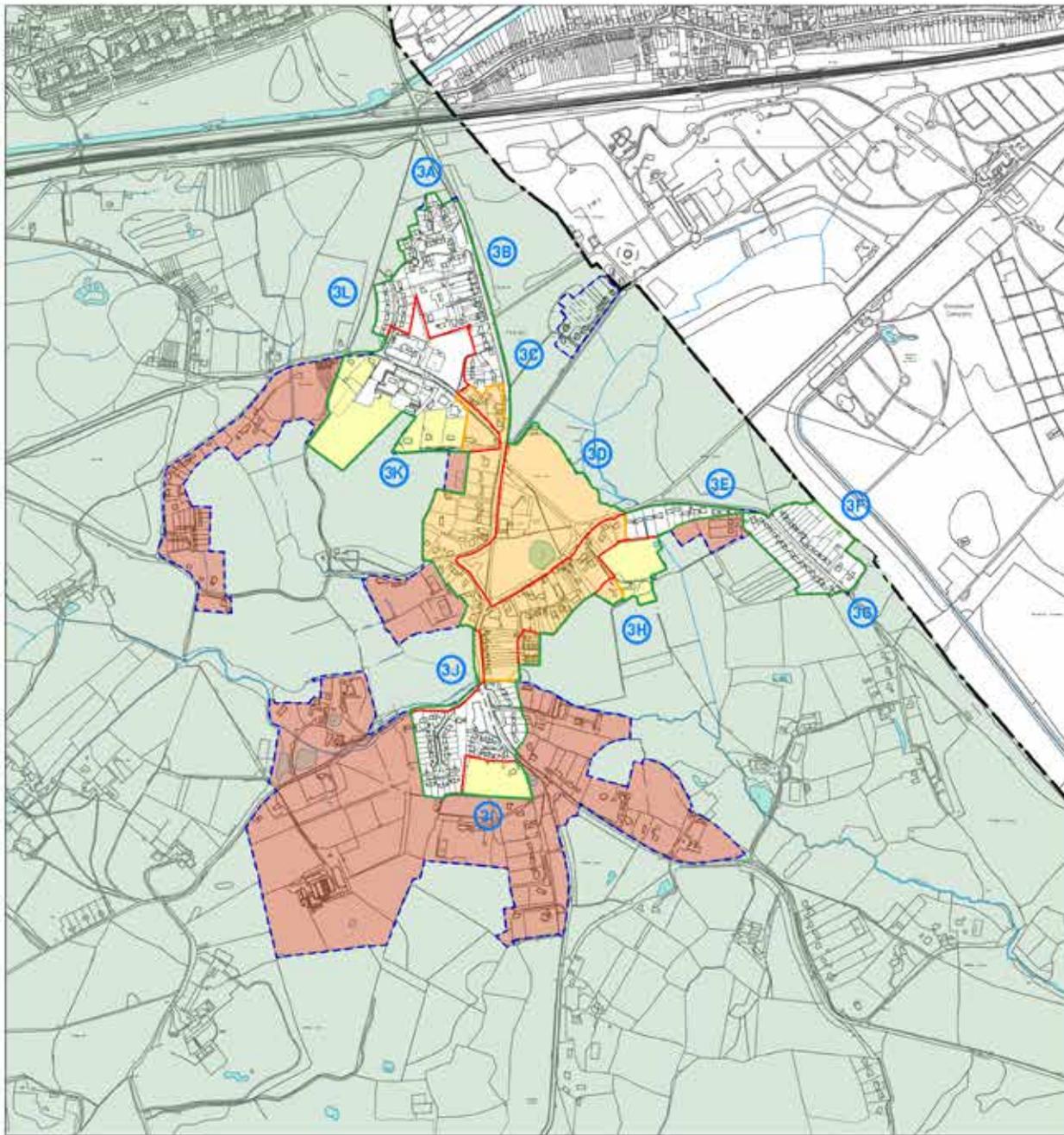
- 3A) A323 Aldershot Road located to the north of St. Michael's Avenue.
- 3B) Fairlands Road located to the east of Fairlands Avenue.
- 3C) Woodland located between Sandpit Heath and the A323 Aldershot Road.
- 3D) Curtilage of Worplesdon Primary School and Hook Farm.
- 3E) Drainage ditch and residential curtilage of properties to south of Envis Way.
- 3F) Drainage ditch and residential curtilage of properties to west of Envis Way.
- 3G) Drainage ditch and residential curtilage of properties to the west of Gumbrells Close and Quaker's Way.
- 3H) Residential curtilage of properties on Brocks Drive
- 3I) Woodland located at Littlefield Common to the north west of St. Michael's Avenue.

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Scale  
1:5,000 @ A3

**Fairlands**  
Proposed Green Belt Insetting Boundary

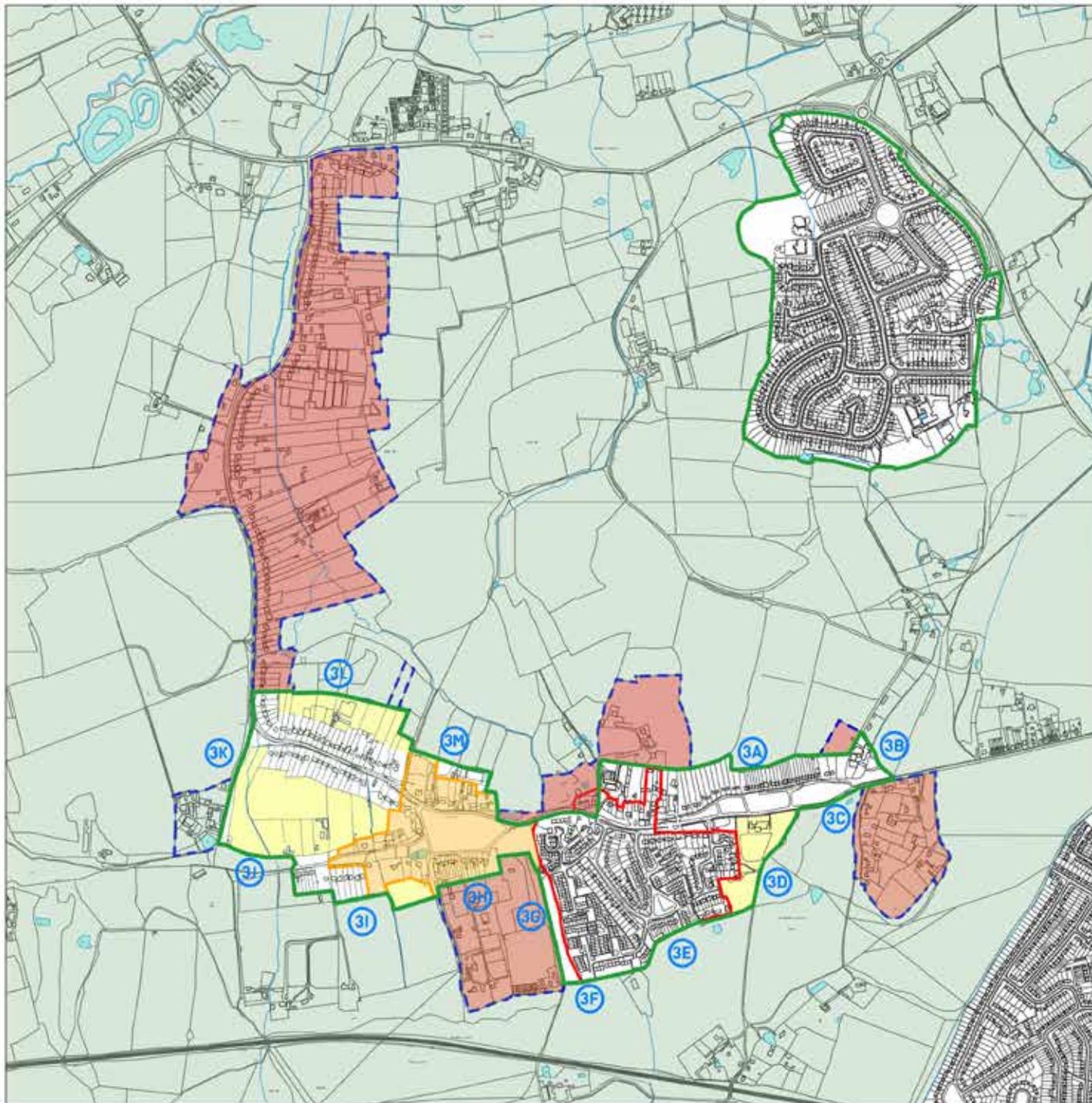


**KEY**

- Extent of perceived Village Area identified within Green Belt - 80.601ha
- Local Plan Settlement Boundary - 18.843ha
- Green Belt
- Green Belt Insetting Boundary
- Guildford Borough Boundary
- Excluded as either ribbon development or has no defensible boundary
- Conservation Area
- Development Area = 5.561ha  
5.561ha @ 30dph= 167 units

- 3A) Woodland following railway line and Basingstoke Canal to the north of Pirbright.
- 3B) Woodland located to the east of the A324 at Dawney's Hill.
- 3C) Woodland located between the A324 and The Gardens at Pirbright Common.
- 3D) Woodland located between The Gardens and Chapel Lane at Pirbright Common.
- 3E) Woodland located between Cemetery Pales and Chapel Lane at Pirbright Common.
- 3F) Woodland located to the east of Chapel Lane.
- 3G) Woodland located to the south of Chapel Lane near White's Farm.
- 3H) Woodland located to the south of Chapel Lane near Pirbright Nurseries.
- 3I) Boundaries of existing residential properties on Rapleys Field and Collens Field.
- 3J) Mill Lane and Guildford Road.
- 3K) Residential curtilage of properties on Burrow Hill and Pirbright Village Primary School.
- 3L) Woodland located to the north of Dawneys Road at Goal Farm golf course.

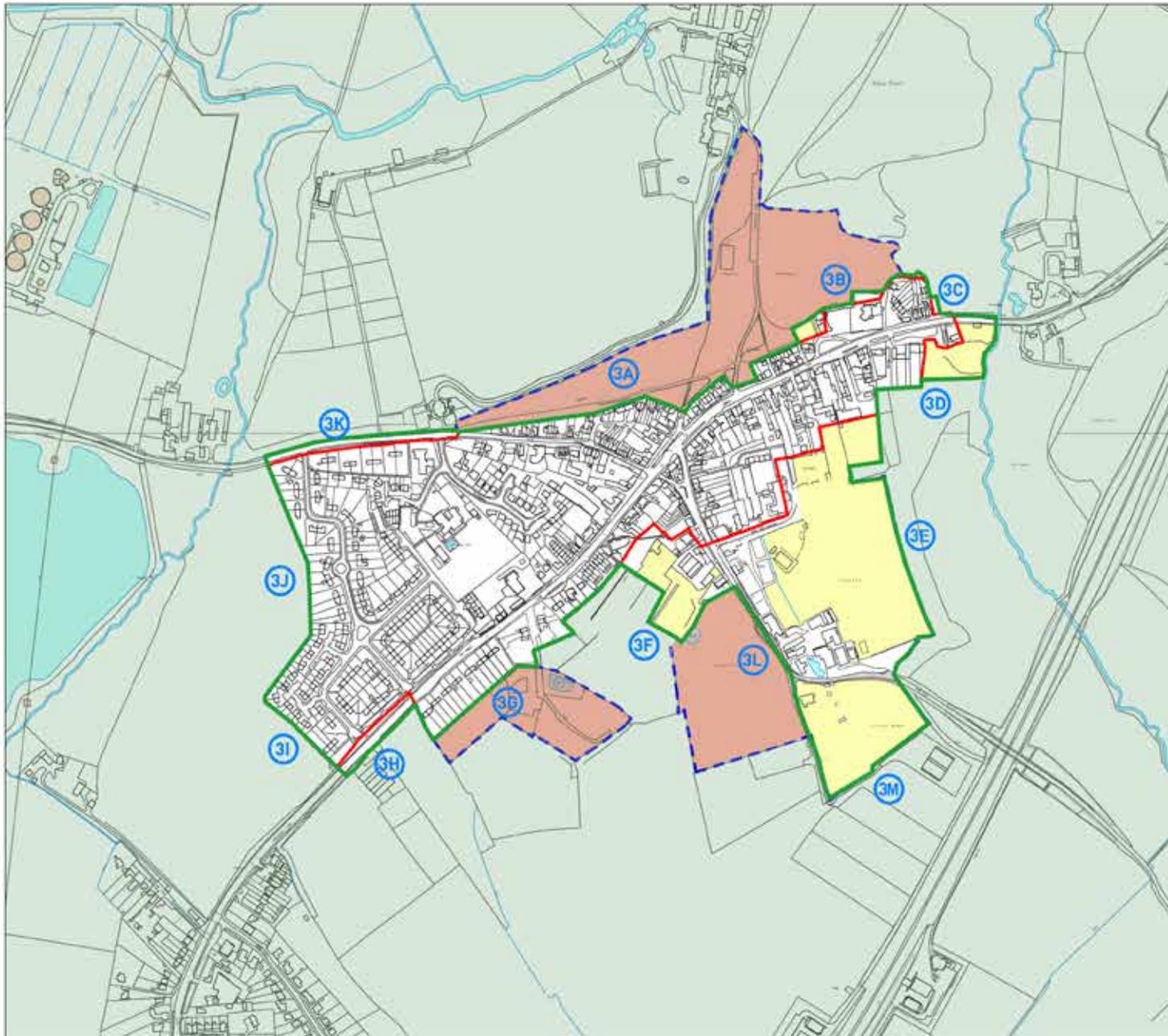




**KEY**

- Extent of perceived Village Area identified within Green Belt - 45.825ha
- Local Plan Settlement Boundary - 15.558ha
- Green Belt Insetting Boundary
- Green Belt
- Excluded as either ribbon development or has no defensible boundary
- Conservation Area
- Development Area = 10.852ha  
10.852ha @ 30dph= 325 units

- 3A) Residential curtilage of properties fronting Oak Hill
- 3B) Access road to Dunmore Farm.
- 3C) Broad Street.
- 3D) Pink's Hill.
- 3E) Woodland to the south of Pound Hill and Hillbrow Close on Broadstreet Common.
- 3F) Woodland to the south of Wildfield Close.
- 3G) Pound Lane.
- 3H) Residential curtilage of properties fronting Wood Street Green
- 3I) Residential curtilage of properties fronting Wood Street Green
- 3J) Copse to south of Russell Place Farm
- 3K) Access road to Russell Place Farm
- 3L) Residential curtilage of properties fronting Frog Grove Lane
- 3M) Residential curtilage of properties fronting Wood Street Green



### KEY

- Extent of perceived Village Area identified within Green Belt - 46.84ha
- Local Plan Settlement Boundary - 23.692ha
- Green Belt Insetting Boundary
- Green Belt
- Excluded as either ribbon development or has no defensible boundary
- Development Area = 7.36ha  
7.36ha @ 30dph = 221 units

- 3A) Residential curtilage of properties fronting Newark Lane.
- 3B) Residential curtilage of properties fronting Ripley High Street.
- 3C) Woodland located to the east of Ripley Green and to the west of Bridgefoot Farm.
- 3D) Woodland located between the High Street and the A3 Ripley Bypass.
- 3E) Woodland to the east of the school playing fields on Rose Lane
- 3F) Residential curtilage of properties on Rose Lane.
- 3G) Residential curtilage of properties fronting the B2215 Portsmouth Road.
- 3H) B2215 Portsmouth Road.
- 3I) Residential curtilage of properties fronting Forbench Close.
- 3J) Residential curtilage of properties fronting Georgelands
- 3K) B367 Newark Lane
- 3L) Rose Lane
- 3M) Woodland located to the south of residential property and allotments on Rose Lane.



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## 7.0 Conclusion

7.1 The concept that sites within sustainable locations have been excluded as suitable sites for redevelopment is completely flawed and at odds with the directive of the NPPF.

7.2 By reconsidering the definition of a 'permanent boundary' and focusing proposed development into more sustainable locations this report has shown that it is possible to accommodate 1010 dwellings (at 30 dph) in the Larger Villages; Normandy & Flexford, Fairlands, Pirbright, Wood Street Village & Ripley.

7.3 GBC should review the work undertaken by its consultants and reconsider expanding the settlement boundaries within its Larger Villages to accommodate more development in sustainable locations.

7.4 Each site proposed as part of the SHLAA should now be reconsidered in the context of its location within the proposed green belt inseting boundary and sites should not be excluded simply because they do not abut a current settlement boundary.

7.5 As part of this review, we request that the council reconsiders site H7-A in Wood Street Green which was identified in Volume III as being 'surrounded by defensible boundaries'.





## Part Two

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## 2.0 Introduction to site H7-A

The emerging scheme is focused on providing an exemplar infill development that provides high standards of design and sustainable construction, whilst protecting and enhancing the landscape and biodiversity assets through carefully located soft landscape and design. The vision is to provide a complementary mix of uses that will help meet the future needs of Wood Street Village and enhance and sustain the area as a high quality place to live.

The proposed development will seek to provide local employment and bring new wealth and prosperity to the area. Health, leisure, sport and recreation opportunities will underpin and support proposed development, ensuring a significant enhancement in the overall environment of Wood Street Village.

The proposal scheme has been carefully designed to embrace the Localism Bill. With increasing planning powers being handed to local communities, the proposed development seeks to offset the impact of development through significant environmental and social benefits. Through the initial design process opportunities have been identified, however it is the intention that local consultation will guide the process. The community benefits need to outweigh the impact of development.

### The proposed scheme includes the following;

- 95 dwellings
- 35% affordable / key worker housing
- Provided with the requisite amount of offsite SANG which has already been secured to facilitate the development
- The creation of substantial areas of public open space
- A play facility, including teen equipment
- Trim trails, activity stations, recreation areas and ecological networks
- The provision of landscape buffers along Frog Grove Lane and other strategic landscaping
- Integration of existing Public Rights Of Way (PRoW) within green spaces
- Traffic calming measures along Frog Grove Lane



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## 2.1 Site Location

The proposed development site is located 2 kilometres (km) to the west of the Guildford settlement boundary and approximately 3.7km from the centre of Guildford. Woking, Aldershot and Farnborough are also in close proximity. Warnborough Rail Station is approximately 2 km away from Wood Street Village and can be accessed by car along the Guildford Road. There are regular bus services to Guildford in the south-east or to Fairlands in the north-west. There are a wide range of uses within close proximity of the site being on the urban-rural fringe of Guildford. These are illustrated on the Site Location plan. Wood Street Village is in the county of Surrey and is part of the parish of Worplesdon. It has a population of 1718 people, (2001 Census).

- To the immediate east of the site is the Wood Street Village settlement. Here there are a variety of uses including a high density concentration of housing to the south of Oak Hill, car maintenance facilities, public houses and also a convenience store.
- In the east of the village there is Woodstreet County Infant School, further east there is the Guildford Grove Primary School and Rydes Hill

Prep School and Nursery and Kings College. Further east, three miles from the village, is the University of Surrey Campus nearing the centre of Guildford, just to the South of the A3.

- The village itself has a thriving community and is actively involved with the Parish Council. The Wood Street Village Association is active in supporting and managing local affairs. To the west of the Village is the Cricket Club which is also in the process of incorporating a pre-school nursery.
- South-east of the site there is the Royal Surrey County Hospital, the Surrey Research Park and the University of Surrey. To the east of the A3 there is the Farnham Road Hospital and the Guildford main line railway station beyond.
- The site is surrounded by natural Copse, public open walks and Common Land, such as Broadstreet Common. Wood Street Village itself has a central village green surrounded by traditional housing which contributes to the Conservation Area and behind the green, off White Hart Lane, is the recently refurbished White Hart Public House.

## 2.2 Landscape Context

The site lies to the western edge of Guildford. The site comprises mainly of open farmland, used primarily as pasture for cattle.

There are active farm buildings situated to the eastern boundary of the site, with residential properties flanking both the northern and southern boundaries of the site. The southern boundary is mainly flanked by mature trees and hedgerows, and a residential unit with commercial outbuildings.

There is a public right of way running along the southern boundary continuing from White Hart Lane, the footpath leads you to a public playing field and cricket wicket situated in the south west corner of the site.



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## 2.3 Transport Links

Being close to established residential and employment areas with a range of facilities and services within a short cycle or bus distance, the site occupies a location considered as suitable for new development. Rail links to work, retail and leisure destinations further afield are already in place in Guildford with the nearest station within 2km at Flexford.

### Vehicle Links

The site would be integrated within the established highway network. Strategically the site is easily accessible from the A323 and Broad Street which both connect to Guildford and Aldershot. Access to the major routes of the A31 and the A3 can be accessed within 3km.

Access to the site would come directly from the Frog Grove Lane via Wood Street. Improvements to the junction would be required including traffic calming measures which would provide significant safety improvements for the local community.

### Public Transport

There are several bus stop located along Frog Grove Lane with regular services to Guildford town centre.

### Foot & Cycle Links

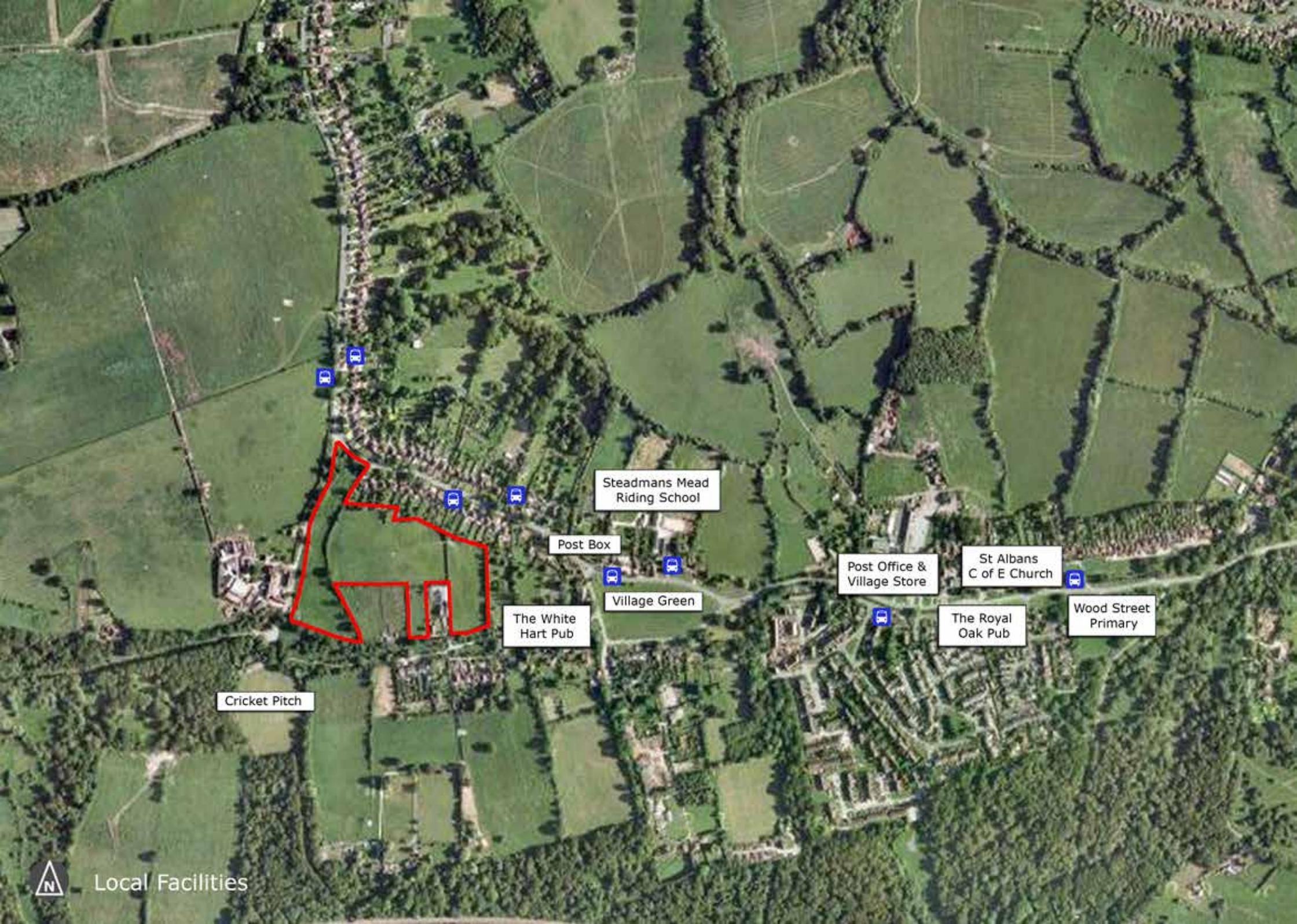
Wanborough railway station is situated 2km to south-west of the site in Flexford. As part of the proposed development significant improvements, including a cycle path, would be completed to provide a direct link to Wanborough Station. The proposed cycle path would link to Bailes Lane.

## 2.4 Local Facilities

Development of the site will provide a mix of new facilities with specific landscape and ecological benefits. The development will provide new employment opportunities as well as being able to provide housing for local people.

The closest primary school to the site is Wood Street Infant School which is 1km from the development site. The nearest secondary school is Kings College in Guildford 2.2km from the site. The diagram opposite shows the site and the surrounding environs. Strategically the site's location offers numerous benefits including;

- Less than 4km away from the centre of Guildford, accessible by foot, car, cycle and bus.
- Excellent bus and road links to Guildford onto the A323 and into north-west Guildford.
- Cycle route to the South of the site across rural countryside, along Broadstreet Common, into Guildford Town Centre. Approximate cycle time to Guildford would be approximately 20 minutes, by car approximately 12 minutes to the station area.
- Existing retail and business parks.
- A local primary school.
- Secondary schools within a 12 minute bus journey.



Steadmans Mead  
Riding School

Post Box

Village Green

The White  
Hart Pub

Post Office &  
Village Store

St Albans  
C of E Church

Wood Street  
Primary

The Royal  
Oak Pub

Cricket Pitch



Local Facilities

## 2.5 The Site

The primary development site comprises approximately 4.2ha of land within a well-defined boundary, occupying a large proportion of the land between Frog Grove Lane and White Hart Lane. The site abuts the lengthy gardens of residential properties to the north whose front aspect open onto Frog Grove Lane. There are also properties to the majority of the southern boundary across White Hart Lane and a small section of open grassland followed by houses to the east. The boundary to the west abuts the access lane to Russell Place Farm.

The site itself is in agricultural use currently being used on an informal basis as grazing pasture for cattle. The site comprises a series of fields accessed from Russell Place Farm to the west and a small access from White Hart Lane from the south. There are no public rights of way over or across the site which is made up from land in private ownership. Boundaries are well defined by fences, trees and shrubs. Access to the site is currently vehicular off White Hart Lane and pedestrian from the access lane to Russell Place Farm. The site is currently designated as green belt and falls within Policy RE1-RE2 of the Local Plan where it is stated that small scale housing developments appropriate to the scale of the locality or for affordable housing

for local needs would be considered against harm to the local environment.



## 2.6 Landscape & Ecology

The site and proposals have been subject to Landscape and Visual Assessment. Key features are summarised below:

- To the immediate north of the site is existing housing;
- To the south of the site is White Hart Lane, a narrow access lane to housing and a pub;
- Beyond this is Broadstreet Common, and Site of Nature Conservation Interest (SNCI);
- To the east of the site is grazing land;
- To the west of the site is an access lane to a farm and beyond that pasture land.

The land itself consists of pasture land, hedgerow and trees. The land is generally flat and the key features of landscape interest are the hedgerows that run from north to south across the site and along the southern boundaries. The masterplan considers the retention and enhancement of these features as part of the proposals.

The land is not covered by any existing ecological designations. The majority of the land is improved grassland, with areas of hedgerow transecting and bordering the site as described above. The hedgerows are of mixed deciduous species (including hawthorn,



ash, blackthorn, English elm, elder, hazel, holly, guelder rose, and bramble).

The site has minimal value for ecology and it is envisaged that there will be no ecological constraints that will preclude development of the site. However, further survey work will be required in relation to protected species including bats, badgers and reptiles. It is expected that the masterplan will need to ensure retention and/or replacement of hedgerows

within the site, which form part of the network of hedgerows across the wider landscape and act as wildlife corridors.

To the south-west and further south of the site is Broadstreet Common SNCI, which offers both biodiversity and recreational value. Again, the proposals for the site will ensure connectivity of ecological and recreational features with the common.

## 2.7 Access and Highways

A transport assessment has not been currently undertaken but will be forthcoming later in the process.

- Wood Street Village's location at the juxtaposition of an existing public corridor together with being in close proximity to two local railway stations allows for the integration of land use and transport planning. The provision of local facilities and the design of work live style units, a central community provision would foster an element of self-containment and so help to reduce traffic movements on the road network.
- Residents would have a convenient access to the wider road network to the A3 and beyond, and the benefit of proximity to an existing bus corridor for people who wish to live near their place of work.
- Guildford town centre is a short bus ride away (Services run every half an hour Monday – Friday from 6.57am with the last bus returning from Guildford at 6.55pm) and offers a large employer base and employment community and an extensive variety of shops and amenities.
- A main vehicular access point has been identified to the north-east of the site at Frog Grove Lane
- Pedestrian and light use vehicle movements and

access could be achieved over current access rights from White Hart Lane, to the south of the site.

An existing cycle route passes to the south of the village across Broadstreet Common but a desired cycle route is proposed along White Hart Lane to

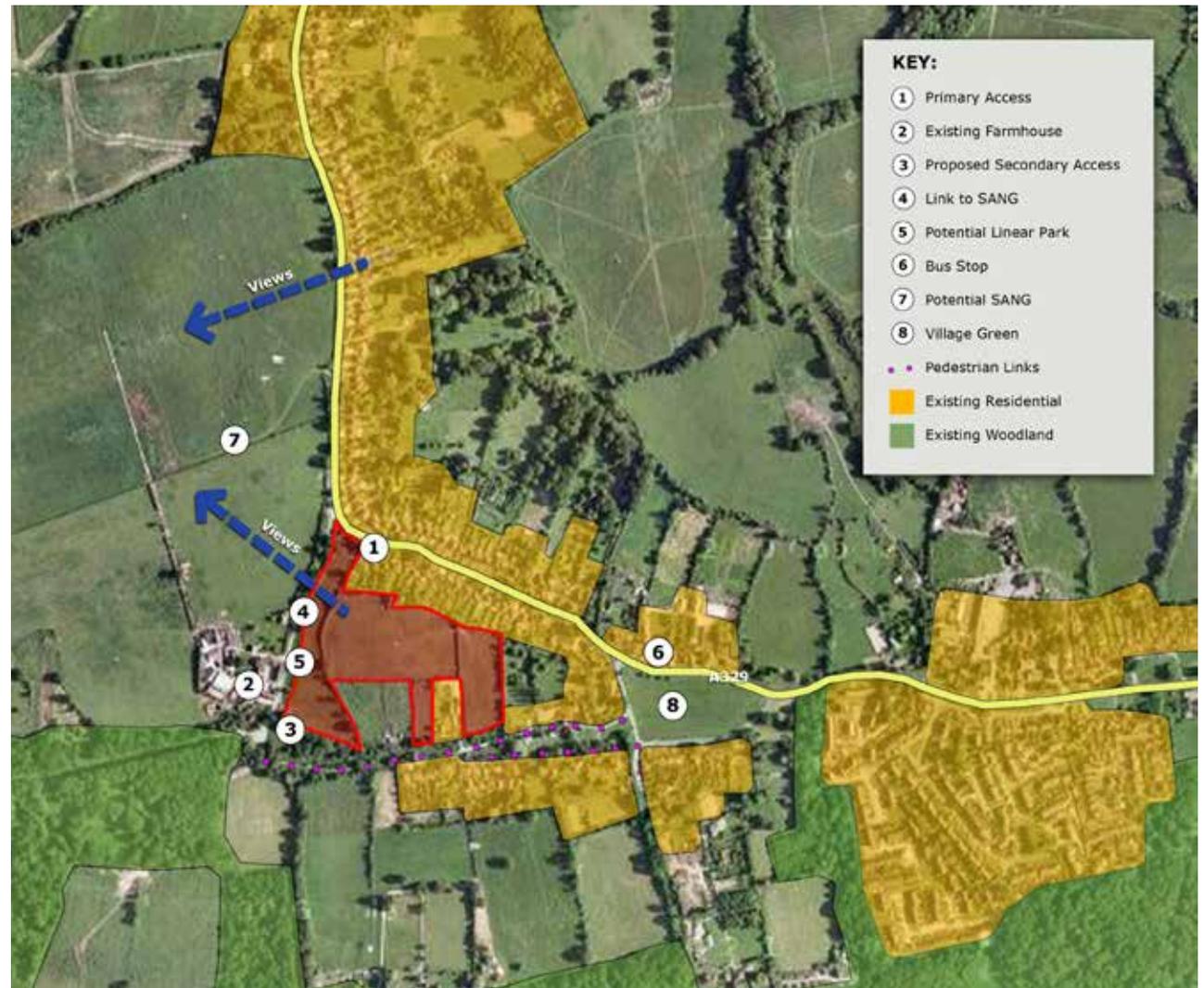
the south of the site. It is suggested that facilities and amenities could be incorporated into the site proposal to assist in the delivery of the desired cycle route.



## 2.8 Constraints & Opportunities

A thorough site analysis has been undertaken which has identified existing site constraints as well as the opportunities and principles for a successful development of the site. The plan is an accumulation of the key opportunities and constraints that have influenced the concept masterplan development.

The analysis of both the site and its context has helped shape the design proposals. Further input into the process has come from the character analysis of the local area.



## 2.9 Concept Design

The proposal at Wood Street Village is for a residential development, which will help create an environment which is fully integrated with the surrounding area.

The proposal would generate employment as local contractors would be used as part of the construction process. Out migration to Aldershot and Guilford offers significant further employment opportunities within close proximity.

The concept masterplan has been created to ensure that any new development responds appropriately to its context and siting as described in the previous sections of this document. It has been designed with consideration to relevant guidance including the National Planning Policy Framework (NPPF). It illustrates how well considered, high quality development of the site can be achieved.





Proposed  
SANG

Parks &  
Open Space

Parks &  
Open Space

Visual Buffer

Parks &  
Open Space

Parks &  
Open Space





SANG link

Pedestrian Route

Cycle Path

Existing Pedestrian Route

Principle Links to Existing Networks



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## 2.10 Sustainable Development

The following have been designed into the illustrative plan to deliver sustainable development objectives for the site;

- Creation of a new mixed use scheme, providing facilities for the community and to support new residents and workers and to add to existing facilities within the area.
- The scheme will include a mix of housing types, size and tenure to ensure that a broad range of people have access to a variety of housing to suit local need a demand.
- Delivery of an appropriate Code for Sustainable Homes Level meeting relevant waste reduction and water efficiency targets, as well as energy efficiencies described above;
- Provision of a comprehensive network of footways and cycle ways to encourage people out of their cars and into more sustainable modes of transport.
- Designed to a high standard and to maximise the best use of land, as a limited resource.
- Retention of significant trees and hedgerows within the site, offering the opportunities to enhance and protect natural wildlife and enhance protected species

## 2.11 Deliverability

The development can come forward in planned phases to respond to housing need during and throughout the plan period. Agreeing delivery with the council is essential.

The illustrative plan document is intended as a starting point for the formulation of a development brief that would guide a more detailed design and subsequent provision of further planning documentation.

The guideline proposals have identified the need from the council and the local village and respected and reacted to the local plan and its core strategy. The land is fully deliverable and not dependant on any third party land.

## 2.12 Conclusion

The development seeks to promote character and quality in its urban design and architectural approach. Inclusive design will enable access for all through sensitive materplanning. Family Focus & Friendly Neighbourhood including community facilities will be engendered. At the core of the development strategy Environmental Sustainability will be key to both the design of buildings and the lifestyle of the development.

The development concept provides a masterplan which includes 95 units, open space and play facilities.

The proposed development provides the opportunity to deliver much needed housing requirements, whilst delivering true community benefits which will be accessible to whole community and create a better environment to live and work.



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