

**GUILDFORD BOROUGH GREEN BELT
& COUNTRYSIDE STUDY**

**SUMMARY DOCUMENT
JANUARY 2013**

Pegasus Planning Group
Abbey House
Grenville Place
Bracknell
Berkshire
RG12 1BP

Telephone: (01344) 667373 Facsimile: (01344) 667376

The contents of this document must not be copied or reproduced in whole or in part without the written consent of **Pegasus Planning Group**

CONTENTS:

Page No:

1.	INTRODUCTION	1
2.	VOLUME I	2
3.	VOLUME II	3
4.	VOLUME III	7
5.	VOLUME IV	9
6.	RELATIONSHIP BETWEEN VOLUMES	11

1. INTRODUCTION

- 1.1 Work commenced on the Guildford Borough Green Belt and Countryside Study in March 2009, with the final draft version, consisting of four volumes, submitted to the Council in December 2012. There were a number of reasons for the study taking over 3 years to complete, including changing national guidance on relevant planning matters and additional areas of work being required as the study progressed.
- 1.2 Due to the timeframe of the study and the substantial amount of information contained within it, it was considered helpful to prepare this summary document highlighting the purposes and recommendations of the study and the individual volumes within it. It is primarily intended to assist members of the public, and therefore attempts to minimise technical references accordingly.
- 1.3 Pegasus Planning Group were instructed by Guildford Borough Council in March 2009 to undertake a Green Belt and Countryside Study of Guildford Borough. The key requirement of the study at that time was to:
- 'Provide a robust, 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 Guildford Local Development Framework Plan Period 2006-2026 (and up to 2030), identifying realistic sustainable location(s) for green field release.'*
- 1.4 Initially, as agreed with Officers, the Study focussed upon potential development on the edge of the main urban areas of Guildford, Ash and Tongham. In May 2011, the Council requested additional work be undertaken, in particular with reference to the assessment of whether villages across the borough could appropriately accommodate additional development. In June 2012, further work was instructed by the Council relating to whether villages should be *'inset'* or *'washed over'* by the Green Belt designation and the identification of Green Belt boundaries relating to the villages as required. This element of the Study was instructed in specific response to revised national guidance issued on the matter within the National Planning Policy Framework (March 2012).
- 1.5 The above areas of work have been divided into separate volumes within the study, the intentions and findings of which will now be referred to in more detail.

2. VOLUME I

- 2.1 Volume I commences with a '*non technical summary*' of the Study, which includes reference to the findings of all four volumes.
- 2.2 A detailed introduction and overview of the purpose and scope of the Study are set out, after which a review of previous Green Belt studies is undertaken in order to identify best practice on such matters. A review of relevant planning policy is then undertaken. Such policy has changed during the course of the Study, most notably with the National Planning Policy Framework (NPPF) replacing previous national guidance, including that of Planning Policy Guidance Note 2 (PPG 2), which specifically related to Green Belt issues.
- 2.3 The volume also outlined the role and purpose of the Green Belt within Guildford Borough, before referring to the methodologies used within the study.

3. VOLUME II

3.1 This relates to the initial assessment of land undertaken at the start of the Study. Its purpose was to appraise the borough's Green Belt and 'Countryside beyond the Green Belt', identifying sustainable locations for the development of greenfield land, should this be necessary to accommodate the borough's future growth. It was assumed that land adjoining the three main urban areas of Guildford, Ash and Tongham would offer the most sustainable locations for such development. Volume II also included the assessment of whether any land that was currently under the '*Countryside beyond the Green Belt*' designation may be appropriately re-designated as Green Belt.

3.2 The methodology used to identify Potential Development Areas (PDAs) consisted of four stages as follows;

Stage 1: Sub-division of the borough into separate land parcels.

This was necessary in order to enable a comparison between different parts of the borough. The boundaries of the land parcels were consistent with national guidance on the requirements of Green Belt boundaries, in case a site was considered to be appropriate for development, and hence removal from the Green Belt and a new Green Belt boundary recommended. Boundaries followed physical landscape features and did not cross motorways, rivers or railways, unless bridges were already in place. Paragraph 7.3 – 7.6 of Volume 2 provides further detail.

Stage 2. Assessing the degree to which each land parcel contributes to the purposes of the Green Belt.

The five purposes of the Green Belt are set out at para 80 of the NPPF, one of which (the encouragement to recycle urban land) applies equally to all Greenfield sites and so was not used in comparisons. Stage 2 scored the individual land parcels depending upon whether or not the parcel was considered to fulfil the four remaining relevant purposes. The highest scoring parcels (scores of 3 or 4) were considered to fulfil the purposes of the Green Belt well, indicating the Green Belt designation should remain. Those parcels which scored poorly (0-2) were considered to fulfil the purposes of the Green Belt to a lesser degree and were therefore considered more capable of accommodating appropriate development and were taken forward to stages 3 and 4 for further assessment.

Full details of the Green Belt purposes and how the parcels were scored against them are set out within Volume II.

Stage 3. Assessing the sustainability credentials.

During the initial stages of the Study it was agreed with the Council that if strategic scale greenfield releases were to be necessary, they would be most appropriately located adjoining the edges of the main urban areas of Guildford, Ash and Tongham. This was due to general sustainability issues, including the proximity of parcels to public facilities, and the relative scale of potential development and its impact upon the character of the adjoining settlement. As a result, only those parcels adjoining the edge of the main urban areas were assessed against sustainability criteria and scored accordingly. Such criteria included the walking distances to a wide range of public services and facilities, details of which, and the associated scoring of parcels for comparison purposes, are set out within Volume 2.

Stage 4. Assessing the environmental capacity of the land parcels to accommodate appropriate development.

Each of the parcels adjoining the main urban areas was reviewed against the following environmental considerations;

- Topography
- Land Uses
- Landscape Character
- Landscape Value
- Nature Conservation
- Cultural Heritage
- Flood Risk
- Other Factors

Some of the environmental constraints identified through the above headings mean that potential development of a site might be entirely prevented. For example, those PDAs in close proximity to the Thames Basin Heaths Special

Protection Area (SPA) would not be appropriate for residential development. However, other constraints might be addressed through appropriate mitigation.

- 3.3 Having undertaken the four stages of work identified above 16 Potential Development Areas (PDAs) were identified. In recognition that there were other factors which would contribute to whether the PDAs were subsequently allocated for development by the Council, it was agreed not to rank the identified PDAs. However, the parcels have been scored in terms of Green Belt purposes, ranked in terms of sustainability criteria and assessed against the same environmental considerations, allowing comparisons between parcels surrounding the urban area to be made.
- 3.4 The identified PDAs adjoining the main urban areas are estimated to be able to accommodate approximately 9,800 dwellings (however, as stated, PDAs are subject to constraints, some more restrictive than others). Due to uncertainty during the Study period with regards to the number of dwellings the Council will be required to introduce to the borough, and to greenfield sites, no target total dwelling figure was put forward for the study to find. Instead, there was a requirement to identify a sufficient level of PDAs that would allow the Council to make appropriate housing allocations, once their requirements with regards to the number of dwellings needed became clearer.
- 3.5 As a result, the Study does not propose that all 16 identified PDAs should be allocated for future development by the Council. If, for example, there was considered to be a requirement to allocate approximately 5,000 dwellings at the edge of the urban areas, then the Council could potentially identify approximately half of the PDAs for allocations and subsequent development, with the remaining half retained in their current Green Belt or 'Countryside beyond the Green Belt' designation. It also highlights that those PDAs lying within the Area of Outstanding Natural Beauty (AONB) should only be allocated for development if no other suitable areas outside the AONB can be developed. The Study refers to the fact that potential urban expansions at Ash and Tongham would not result in the loss of Green Belt land, due to such areas currently being designated as 'Countryside beyond the Green Belt'.
- 3.6 Volume II of the Study does propose the alteration of the existing Green Belt boundary to the south of Ash and Tongham, to include some additional Green Belt land, thereby strengthening the Council's control over future development within it. This would however be dependent upon the eventual housing

requirements for the Borough, and the possible need for such land to help accommodate the growth of the Borough in the longer term.

4. VOLUME III

- 4.1 In the summer of 2011 Pegasus Planning Group were instructed by the Council to assess whether the villages lying outside of the Surrey Hills Area of Outstanding Natural Beauty (AONB) and the Thames Basin Heaths Special Protection Areas (SPA) within the borough could appropriately accommodate further development beyond their current built limits.
- 4.2 It was intended that, subject to the eventual housing requirements of the borough, this would enable the Council to consider a spatial strategy option that allowed for the growth of the villages within the borough, alongside potential growth of the main urban areas.
- 4.3 The methodology for assessing the appropriateness of development sites adjoining the villages was altered slightly from that of the main urban areas described under Volume II above. If those land parcels which scored highly against Green Belt purposes (a score of 3 or 4) were eliminated from further assessment (as occurred for the main urban areas) this would have resulted in a number of the villages not being considered for any PDAs. Whilst such an approach could have been taken, it was not considered helpful to the Council's subsequent assessment of potential allocations. As a result, whilst all of the land parcels adjoining the villages were assessed against Green Belt purposes, the score against such purposes did not prevent the parcels being assessed against environmental capacity, and sustainability criteria.
- 4.4 Due to the necessary smaller scale of PDAs associated with the villages, it was considered helpful to identify the specific PDA, based upon the environmental capacity, prior to the assessment against sustainability criteria. Without this change of sequence from that undertaken for the urban areas, sustainability would have been assessed based upon the central point of the land parcel, which may have been notably different from the individual PDA and hence misleading.
- 4.5 A summary of the environmental capacity of each village is provided within Volume III (Section 11), followed by identification of the PDAs for each village and their assessment against the same environmental headings as used within Volume II.
- 4.6 The sustainability criteria were very similar to those used for the urban areas, but were altered to exclude those facilities only found at the main urban areas.

-
- 4.7 The assessment resulted in 41 PDAs being identified on the periphery of villages across the borough. In some instances more than one PDA has been identified per village, while some villages have been considered to be too environmentally constrained to offer any PDAs.
- 4.8 The identified PDAs are estimated to be able to accommodate approximately 4,900 dwellings, but as with the PDAs associated with the main urban areas, it is not envisaged that all PDAs would progress to be allocated for development by the Council.
- 4.9 Subsequent allocations will be influenced by the Council's eventual housing requirement and the chosen spatial strategy. It is also recognised that the study has not investigated the availability of PDAs, which may prevent some of them coming forward for development (this work has been carried out as part of the Strategic Housing Land Availability Assessment). The Study intends to provide the Council with sufficient flexibility to allocate the necessary number of village PDAs and through consideration of the Green Belt purposes score, sustainability rankings and environmental constraints, allows for comparison between those PDAs that have been identified, prior to potential allocation by the Council.

5. VOLUME IV

5.1 At present villages within the Green Belt in Guildford Borough are ‘washed over’ by the Green Belt designation, albeit Policy RE3 of the Council’s Local Plan (2003) has allowed for some forms of development within a number of the villages that would not normally be allowed under National Green Belt guidance.

5.2 The National Planning Policy Framework (NPPF) was published in March 2012 and introduced guidance on the issue of whether villages should be inset from the Green Belt or ‘washed over’ by the Green Belt, that differed from that previously set out in Planning Policy Guidance Note 2 (PPG2), which the NPPF replaced. Following the release of such guidance, it was considered sensible to include an assessment of the Green Belt villages in the borough as part of the Green Belt Study, the findings of which could inform the Council’s emerging Local Plan. This was considered especially timely given that the NPPF confirms that if Green Belt boundaries are to be altered, they should only be so through the review of the Local Plan.

5.3 Paragraph 86 of the NPPF advises upon whether a village should, or should not be included in the Green Belt as follows;

‘If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt.’

5.4 Volume IV of the Study attempts to make such a judgement, and also proposes new Green Belt boundaries for those villages that are recommended to be inset from the Green Belt. The assessment of villages was broken down into three stages as follows;

- Stage 1: Assessing the degree of openness within each village through analysis of the urban form, density and the extent of developed land.
- Stage 2: Assessing the locations of new Green Belt boundaries within the surroundings of each village.
- Stage 3: Assessing the suitability of each village for inseting within the Green Belt and defining potential Green Belt boundaries.

-
- 5.5 The Study recommended that 8 of the 24 villages should remain 'washed over' by the Green Belt, in accordance with the NPPF guidance, whilst the remaining 16 should be inset within the Green Belt and provided with a Green Belt boundary accordingly.
- 5.6 The insetting of villages within the Green Belt does not automatically imply that development within such villages is appropriate. Development proposals would remain subject to other local planning policies and the character of such villages can continue to be protected through means such as Conservation Area status, as encouraged by the NPPF.

6. RELATIONSHIP BETWEEN VOLUMES

- 6.1 Due to the different elements of work that have been undertaken for the Study, and the considerable time period during which it has taken place, it is considered helpful to comment upon how the separate Volumes of the Study relate to each other.
- 6.2 Volume I provides the background to the Study and summarises the methodology and findings of the other volumes. As a result it is directly related to the other volumes and simply reports on them.
- 6.3 Volume II and Volume III have a very similar intention, this being to identify appropriate sustainable locations to allow for the growth of the Borough, albeit Volume II focuses upon the potential expansion of the main urban areas, whilst Volume III focuses upon the potential expansion of the villages.
- 6.4 As explained within sections 3 and 4 above, a slightly different methodology was adopted for the identification of PDAs between Volumes II and III. This is not considered to weaken the findings of the Study for the following reasons;
- Direct comparison can be made between recommended urban area PDAs and other recommended urban area PDAs, and between recommended Village PDAs and other recommended Village PDAs across the Borough.
 - The methodologies reflect the scale of development that would be likely to be appropriate in the context of the urban areas or villages, and the different environmental constraints and sustainability parameters that apply.
 - Whilst direct comparison between urban and village PDAs may not be appropriate or required given the different scales and purposes of development typically assumed for the urban and village areas, if comparison is needed, all recommended PDAs have been assessed against largely similar criteria, so the data is available within the Study to make such comparison.
- 6.5 6.5 Whilst Volume II (urban areas) was undertaken prior to Volume III (village areas), the Study does not recommend that all urban PDAs should be allocated prior to any village PDAs. When the Study began it was assumed that necessary green field development could be allocated within a small number of urban expansions. During the Study it became less clear that this could be achieved, hence the requirement to assess alternative options and instruction of Volume 3.

-
- 6.6 The Study does not attempt to propose the spatial strategy, which will need to be informed by other factors. It is however intended to assist with the identification of potential development allocations, once such a strategy is adopted by the Council. As a result Volumes II and III are both considered necessary and helpful, and the Council will be able to recommend allocations from the identified PDAs once housing requirements are known and a spatial strategy agreed.
- 6.7 Both Volumes III and IV consider the Villages within the Borough. Work on Volume III was undertaken in 2011 to identify PDAs, whilst work on Volume IV was undertaken in 2012, in response to the NPPFs guidance, published in March 2012, on whether to inset or wash over villages in the Green Belt.
- 6.8 The findings of both Volume III and IV are considered to be sound when assessed independently. It is recognised that if a PDA identified at a village (within Volume III) is subsequently allocated for development by the Council, then the associated Green Belt boundary of the village may need to be different to that currently proposed within Volume IV. This is because the recommended Green Belt boundaries set out within Volume IV relate to development, and associated boundary features, as they currently exist. It was considered premature to allow for the PDAs within the proposed Green Belt boundaries, because such PDAs might not be allocated. As a result, the Council may need to propose a different eventual Green Belt boundary to that currently proposed in Volume IV if a village is to receive a development allocation, but this should be straight forward, given that the PDA will have been identified with an appropriate boundary, based upon NPPF Green Belt requirements.
- 6.9 There are some instances where the proposed Green Belt boundaries of a village, as set out in Volume IV, might appear to go beyond the existing built up or settlement boundary, suggesting that a PDA has been assumed to be included. This is not the case. The reason for the proposed Green Belt boundaries sometimes not directly following the built up part of a village, is in order to adhere to the NPPF guidance on such boundary lines. This requires at paragraph 85 that boundaries follow physical features that are readily recognisable and likely to be permanent. As explained at 5.6 above, the inclusion of land within a village boundary that is inset from the Green Belt does not automatically imply that development would be acceptable, with other relevant planning policies still applying to any development proposals.