

Topic paper: Green Belt and the Countryside June 2017

To accompany Guildford borough Proposed Submission Local Plan: strategy and sites



Further information and alternative formats

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Topic paper:

1 Purpose of this topic paper

- 1.1 This topic paper is one in a series, which sets out how we have developed the key strategy within the Guildford borough proposed submission Local Plan: strategy and sites document. Each topic paper will look at the relevant national and local guidance that informs the proposed submission Local Plan. Topic papers will explain how the strategy has developed and the information, evidence and feedback that has informed the choices made in formulating the policies.
- 1.2 The intention of the topic papers is to provide background information; they do not contain any policies, proposals or site allocations. All topic papers will be finalised to accompany the submission of the draft Local Plan to the Secretary of State for examination.
- 1.3 The main areas covered by this topic paper are:
- Inset of villages (villages removed from the Green Belt)
 - Washed over villages (villages remaining in the Green Belt)
 - Inset major previously developed sites
 - Inset Traveller and Travelling Showpeople sites
 - Amending Green Belt boundaries
 - Exceptional circumstances
 - Safeguarded land
 - Countryside

2 Policy Context

National context

- 2.1 Our policies must be positively prepared, justified, effective and consistent with national policy and legislation. The [National Planning Policy Framework](#) (NPPF) sets out the overarching planning policy framework, supported by [Planning Practice Guidance](#).
- 2.2 The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.
- 2.3 The NPPF (paragraph 80) sets out the five main purposes of the Green Belt which are:
- to check the unrestricted sprawl of large built-up areas
 - to prevent neighbouring towns merging into one another
 - to assist in safeguarding the countryside from encroachment
 - to preserve the setting and special character of historic towns
 - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

- 2.4 National policy does allow for the review of Green Belt boundaries in exceptional circumstances, through the preparation of a Local Plan (paragraph 83).
- 2.5 It states at paragraph 85 that *‘when defining boundaries, local planning authorities should:*
- *ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;*
 - *not include land which it is unnecessary to keep permanently open;*
 - *where necessary, identify in their plans areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*
 - *make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the 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.’*
- 2.6 It also states that villages should only be included in the Green Belt if the open character of the villages makes an important contribution to the openness of the Green Belt (paragraph 86).
- 2.7 The NPPF has a general presumption against development in the Green Belt unless very special circumstances are demonstrated. There are however some uses that are appropriate in the Green Belt and these are listed in paragraphs 89 and 90:
- ‘89. A local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this are:*
- i. buildings for agriculture and forestry;*
 - ii. provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it;*
 - iii. the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;*
 - iv. the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;*
 - v. limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan; or*
 - vi. limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.’*

‘90. Certain other forms of development are also not inappropriate in Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt. These are:

- i. *mineral extraction;*
- ii. *engineering operations;*
- iii. *local transport infrastructure which can demonstrate a requirement for a Green Belt location;*
- iv. *the re-use of buildings provided that the buildings are of permanent and substantial construction; and development brought forward under a Community Right to Build Order.'*

2.8 National policy for travellers is contained separately in Planning policy for traveller sites. At paragraph 15 it states that if a local planning authority wishes to amend the Green Belt boundary in order to accommodate a traveller site to meet a specific and identified need, it should do so only through the plan-making process and not in response to a planning application. When doing so, the land should be specifically allocated as a traveller site.

Local context

2.9 Green Belt and the countryside are both key issues of significant importance for our borough, as one of our key priorities is to protect the environment and our open countryside. We have commissioned or produced various documents to inform our understanding of how to balance the protection of the countryside with the needs of the community. The most relevant documents will be addressed in greater detail in the sections below.

2.10 An overarching local approach to Green Belt and countryside is set out in the Guildford borough Corporate Plan 2015-20. Under the themes of our borough and environment, our strategic priorities are identified as:

- Providing a range of housing to meet need
- Achieving a sustainable rural economy
- Protecting green spaces and limiting encroachment into countryside
- Protecting and improving our environment

2.11 The Metropolitan Green Belt was established under the London Home Counties (Green Belt) Act 1938 and the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt in Guildford borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London.

2.12 Currently the borough comprises approximately 89 percent Green Belt. The only settlement currently inset or removed from the Green Belt is the Guildford urban area itself. We also have a smaller amount of countryside in the west of the borough surrounding the Ash and Tongham urban area, and including the village of Ash Green, which is non Green Belt. This is currently referred to as Countryside Beyond the Green Belt. The remaining rural area, including all other villages, is currently washed over by the Green Belt.

Neighbourhood Plans

2.13 Neighbourhood Planning enables Neighbourhood Forums and Parish Councils to develop a vision and planning policies for their designated neighbourhood area.

Those 'Neighbourhood Plans' which are successfully adopted will form part of the statutory development plan for the area that they cover. Where a Neighbourhood Plan is adopted or emerging before an up-to-date Local Plan is in place, the local planning authority should take it into account when preparing the Local Plan policies.

- 2.14 There is currently one adopted Neighbourhood Plan (Burpham) and one emerging Neighbourhood Plan (Effingham) within the borough. Seven other Parish Councils are also currently producing Neighbourhood Plans. Once formally adopted these documents form part of the development plan and can carry weight in the planning process.
- 2.15 We have reviewed the Burpham Neighbourhood Plan and do not consider there are policies that would be relevant for this topic paper.
- 2.16 The weight given to an emerging plan will depend on, among other things, the extent to which there are unresolved objections to the plan (NPPF paragraph 216). Therefore, an emerging neighbourhood plan will pick up weight once evidence of consultation is published and the level of unresolved objection is known. At time of writing, the Effingham Neighbourhood Plan has been through two statutory consultations. The plan is progressing towards examination and is accorded limited weight at this stage.
- 2.17 Details are available at www.guildford.gov.uk/neighbourhoodplanninginformation

3 Evidence base

- 3.1 The NPPF requires us to develop policies based on up to date evidence. Our evidence base comprises documents that have helped inform past and current stages of our Local Plan policy development and emerging evidence that will help inform future development of policies for the Local Plan.
- 3.2 Evidence base relevant to the Green Belt and the countryside comprises:
- [Green Belt and Countryside Study](#) (volumes I – VI)
- 3.3 The primary purpose of the Green Belt and Countryside study (GBCS) was to review land across the borough to identify Potential Development Areas (PDAs) and Potential Major Development Areas (PMDAs) for future housing and other growth requirements in the event that we could not identify sufficient suitable land within the urban areas and villages.
- 3.4 The study also takes account of the NPPF in terms of the inseting of villages and major previously developed sites from the Green Belt.
- 3.5 The study consists of six volumes:
- Volume I – summary, introduction and background to the study (volumes I – IV only)
 - Volume II – Green Belt and 'Countryside beyond the Green Belt' within the surroundings of the urban areas at Guildford, Ash and Tongham
 - Volume II addendum – further consideration of land surrounding the urban areas of Guildford, Ash and Tongham
 - Volume III – Green Belt surrounding villages across the borough

- Volume IV – insetting of villages from the Green Belt
- Volume V –
 - potential expansion of settlements located in adjoining boroughs with Guildford borough
 - potential expansion of villages located within or bordering the Surrey Hills AONB
 - further consideration of Countryside Beyond the Green Belt (CBGB)
 - potential expansion or redevelopment of major previously developed sites
 - potential major expansion of the most sustainable villages
 - potential creation of a new settlement at Wisley airfield
- Volume VI – insetting of traveller sites from the Green Belt

3.6 Further work was undertaken following a resolution made at an extraordinary meeting of the Council on 13 January 2014. This resulted in a special Local Plan Scrutiny Forum, held on 4 March to enable the community to share their views on the evidence base and raise issues concerning methodology and fact only. This exercise led to the preparation of Volume II addendum and a re-issue of Volume IV.

3.7 Subsequent to this, a further Volume II addendum has been prepared in 2017. This builds further upon the work previously undertaken in that it assesses the Green Belt sensitivity of the next layer of land parcels around the urban areas on the assumption that the sites proposed in the Regulation 19 Local Plan (2017) are built.

3.8 Further information and copies of the evidence base documents are available on the Council's website at: www.guildford.gov.uk/newlocalplan/evidencebase

4 Appraisal

4.1 The following section brings together relevant legislation and key evidence base findings where appropriate. It also highlights key consultation feedback from the previous two consultations. It highlights the main areas relevant to formulating a Local Plan policy approach for Green Belt and Countryside in our borough.

Changes from previous Green Belt national policy

4.2 Previous Green Belt policy was contained within Planning Policy Guidance 2 (PPG2). This has been superseded by the National Planning Policy Framework (NPPF), which was published in 2012. Whilst the NPPF broadly represents a continuation of previous policy, there has been a significant change in the policy approach to villages. PPG2 had previously given a choice as to whether villages should remain washed over by the Green Belt or whether they should be inset (removed) from the Green Belt. This is in contrast to the NPPF, which requires that all villages that do not make an important contribution towards the openness of the Green Belt are inset (paragraph 86, see below). A number of councils chose to inset their villages under PPG2, such as Mole Valley, although Guildford did not. Given that this flexibility in approach has now been removed, we must consider this requirement as we continue to prepare a new sound Local Plan.

4.3 NPPF, paragraph 86 states:

*'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'. (emphasis added)*

- 4.4 As part of considering this paragraph, it is important to note that there are two aspects to it. The first is to consider whether the village does (or does not) have an open character. The second consideration is whether this open character makes an important contribution to the openness of the Green Belt. It therefore follows that merely fulfilling the first part of the paragraph, and exhibiting a somewhat open character, does not necessarily justify remaining washed over by the Green Belt.
- 4.5 The Redhill Aerodrome Court of Appeal ruling (Redhill Aerodrome Limited v Secretary of State for Communities and Local Government, Tandridge District Council, Reigate and Banstead Borough Council [2014]) has further clarified that except for the change to inseting, Green Belt policy has broadly remained the same. The relevant paragraph in the ruling states:

*'by contrast with paragraph 86 of the Framework, which **does change the policy approach** to the inclusion of villages within the Green Belt, paragraph 87 emphasises the continuation of previous Green Belt policy (in PPG2) in respect of inappropriate development: "As with previous Green Belt policy."' (emphasis added).*

- 4.6 Insofar as exceptional circumstances are required in order to amend Green Belt boundaries, the change in policy approach as set out above together with the detailed consideration of each village provides the justification for this.

Villages

Inset villages

- 4.7 As set out by the NPPF, those villages that do not make an important contribution to the openness of the Green Belt should be inset. This means that a new Green Belt boundary is drawn around the relevant parts of the village. The NPPF requires that Green Belt boundaries should be defensible, namely that they are defined clearly, using physical features that are readily recognisable and likely to be permanent (paragraph 85, bullet 6). This includes features such as woodlands, hedgerows, tree belts, waterways, highways and railway lines.
- 4.8 The restrictions set by national Green Belt policy, as set out above, would therefore not apply in these villages as new buildings here are not considered to harm the openness of the Green Belt. Therefore, any extensions and replacement buildings would fall outside the scope of the disproportionate or materially larger tests.
- 4.9 Instead, normal Development Management policies would apply in these areas. This includes policies on matters such as access, design, amenity space, character, heritage, and so on. These policies seek to ensure that any development does not cause any adverse harm. In this way, development would still be controlled, however only in relation to matters such as these and not in relation to Green Belt policy considerations.

- 4.10 It is worth stressing that the decision to inset is based on the contribution that the village, as it stands today, makes to the openness of the Green Belt. This is based on the current built up nature of the village, its relationship to the wider Green Belt and the presence of defensible boundaries. It is not based upon whether the village has been identified as having potential development areas around it.
- 4.11 Instead, the identification of potential development areas around villages is a separate exercise. In accordance with the NPPF (paragraph 84), any site allocations should be directed to those villages that are inset (rather than washed over). The potential development areas are identified on the basis that, should exceptional circumstances warrant amending the Green Belt boundary in order to accommodate growth that could not be suitably provided elsewhere, development here would not harm the main purposes of the Green Belt. If allocated, the inset boundary surrounding the village would be extended to incorporate the site. It is important to note that not all inset villages will necessarily contain site allocations.
- 4.12 Volume IV of the Green Belt and Countryside Study (GBCS) in 2012 assesses all of our villages and recommends that the following villages should be inset from the Green Belt: Chilworth, East Horsley, Effingham, Fairlands, Flexford, Gomshall, Jacobs Well, Normandy, Peasmarsh, Ripley, Send, Send Marsh/ Burnt Common, Shalford, Shere, West Horsley and Wood Street Village.
- 4.13 The draft Local Plan (2014) proposed to inset all the recommended villages with the exception of Gomshall and Shere. Informed by consultation responses to the Issues and Options document, we considered that they should remain in the Green Belt. The GBCS assesses that parts of Gomshall have an open character with visual connections to the wider Green Belt. We consider that this is also applicable to parts of Shere. We consider that these factors are still relevant and continue to propose in the Proposed Submission Local Plan that Gomshall and Shere are not inset from the Green Belt.
- 4.14 Whilst the majority of the detailed Green Belt inset boundaries have been informed by the findings of the GBCS (Volume IV), there have been a number of small amendments where it has been demonstrated, through either consultation comments or further consideration, that there exists an alternative more appropriate boundary. In each instance, we consider the change to be justified as it accords with the principles of only retaining the Green Belt designation on land that makes an important contribution to the openness of the Green Belt and ensuring that new boundaries use physical features that are readily recognisable and likely to be permanent.
- 4.15 As part of developing our plan we have also given further consideration regarding how development, which was previously inappropriate but now may be appropriate, could be managed to ensure that it respects the rural character of our villages. This was in response to considerable concern raised through the Draft Local Plan (2014) consultation that existing Development Management policies would not adequately address this issue. The Regulation 19 Local Plan (2016) introduced the Open Space designation on the policies map through policy I4 (called policy ID4 in the Regulation 19 Local Plan (2017)). This sought to expand upon the Local Plan 2003 policy R5 which only identifies open space in urban areas, to cover land in inset villages that is of public amenity value. The NPPF protects land that is used for open

space, sport and recreation. Land in these uses is identified through the Open Space, Sports and Recreation Assessment and will be protected in line with the NPPF. This will ensure that development does not occur on land that is of public value.

- 4.16 In addition to this designation, the Regulation 19 Local Plan (2016) also included a new policy on development in urban areas and inset villages (Policy D4). This has been widened in the Regulation 19 Local Plan (2017) to apply to character and design of all new development. Whilst the policy also still retains a list of considerations particularly pertinent to village developments, this too has been widened to be applicable to all villages (rather than just inset villages). This ensures that, on those sites that are considered appropriate for development, careful attention is given to their design. Specifically, it requires that within villages regard be given to the protection of important views and the transition between built form and surrounding countryside.

Washed over villages

- 4.17 As set out by the NPPF, those villages that do make an important contribution to the openness of the Green Belt should remain washed over. This means that the whole village will retain its Green Belt designation. In doing so, any planning applications within these villages would need to be considered against national Green Belt policies.
- 4.18 Development is therefore strictly controlled which helps to ensure that the contribution these villages make to the openness of the Green Belt is maintained rather than slowly eroded over time. In these villages therefore, only development listed in NPPF paragraphs 89 and 90 is considered appropriate unless very special circumstances are demonstrated.

Limited infilling in villages

- 4.19 Recent case law has clarified the extent of 'limited infilling in villages' (paragraph 89, bullet 5). The draft Local Plan (2014) included two categories of villages; inset and identified. The latter remained washed over by the Green Belt designation however included an identified settlement boundary within which the proposed policy (Policy 9) stated that limited infilling could occur, in accordance with paragraph 89 (bullet 5) of the NPPF.
- 4.20 However, since then there has been a Court of Appeal ruling (Julian Wood v. The Secretary of State for Communities and Local Government and Gravesham Borough Council [2015]) which found that the inspector in that case had misdirected himself by accepting the Local Plan boundary as being conclusive as to whether or not the site appeared to be in the village. Instead, the inspector was required to consider whether, as a matter of fact on the ground, the site appeared to be in the village.
- 4.21 If the site is in fact considered to be part of the village then national policy enables limited infilling to occur. It is important to note that there are two tests at play. The first being whether the site is within the village and the second being whether the proposal constitutes limited infilling (and is therefore appropriate in Green Belt terms). Limited infilling is considered to be the development of a small gap in an otherwise continuous built-up frontage, or the small-scale redevelopment of existing

properties within such a frontage. It also includes infilling of small gaps within built development. It should be appropriate to the scale of the locality and not have an adverse impact on the character of the countryside or the local environment.

- 4.22 This change in interpretation has led us to reconsider our policy on villages and the way in which we address this through the emerging plan. In the first instance, we need to clarify those settlements that we consider to constitute a 'village'. We will principally use the findings of the Settlement Hierarchy¹ to define these. This document includes all settlements defined by a Census Output Area. An output area must have a minimum of 100 people and is the lowest level of geography for publishing statistics. The Settlement Hierarchy categorises villages as a rural service centre, large village, medium village, small village or loose knit village. We consider that these settlements constitute a 'village' and will be defined as such in the new Local Plan.
- 4.23 In terms of the extent of the village, we still consider that there is merit in identifying a settlement boundary for those villages whose character and context enables us to do so. This would help give a degree of certainty to both residents and developers regarding the first test (namely whether land is considered to be within the village or not). However the decision-maker would still be required to consider the second test, and whether or not the proposal constituted limited infilling.
- 4.24 It is important to stress that, as clarified by the ruling, this boundary is not definitive and any applications on land outside an identified settlement or inset boundary would still need to be considered on a case-by-case basis.
- 4.25 The Proposed Submission Local Plan therefore identifies three different categories of villages. Inset villages, washed over villages with an identified settlement boundary and washed over villages without an identified settlement boundary. For all but two villages the categories are mutually exclusive, these being East Horsley and Ripley. Whilst the majority of both villages are inset from the Green Belt, there remain sufficient areas that are not inset but which clearly form part of the village. We consider that there is justification, as set out above, for identifying the wider extent of each village with an identified settlement boundary. For East Horsley this is land south of the A246 and for Ripley it is land north of the High Street.

Extensions or alterations

- 4.26 Extensions or alterations of a building are also an appropriate exception provided that it would not result in 'disproportionate additions' over and above the size of the original building. This restriction ensures that the openness of the Green Belt is maintained within those villages that are considered to contribute towards it.
- 4.27 Whilst the Proposed Submission Local Plan has not sought to identify the scale of increase that we consider may be appropriate, we do intend to prepare a Green Belt Supplementary Planning Document (SPD), which will provide further detail and guidelines to help inform development proposals.

¹ Available online at: www.guildford.gov.uk/newlocalplan/infrastructureanddelivery

- 4.28 The Proposed Submission Local Plan does however define and clarify what we consider to constitute the 'original building' over and above which any extensions or alternations should not be disproportionate. The NPPF glossary defines this as:

'A building as it existed on 1 July 1948 or if constructed after 1 July 1948, as it was built originally'

- 4.29 The interpretation of the exact meaning of the second part of the sentence varies amongst planning inspectors. The key point being as to whether, if there was no building in existence on 1 July 1948 and one subsequently gets built and then replaced, whether the baseline from which we measure disproportionate is the first building to be built or the replacement building.
- 4.30 We consider that it is the former, namely that it constitutes the building as existed in 1 July 1948 or, if no building existed, then the first building constructed after that date. This is consistent with the overall aim and purpose of the Green Belt, which is to keep land permanently open. To consider each replacement building as the original building would simply lead to a continual and gradual encroachment of the Green Belt. This would conflict with the purpose of retaining certain villages in the Green Belt as, over time, these have the potential to become increasingly less open and thereby harming the important contribution that their open character makes to the openness of the Green Belt.

Replacement buildings

- 4.31 As set out previously a further appropriate exception is the replacement of a building provided it remains in the same use and is not materially larger than the one it replaces. We consider that there is justification or further expanding on this policy to ensure that as a starting point, the replacement building should be sited on or close to the position of the existing building. Doing so ensures that the replacement building is unlikely to have a larger impact on the openness of the Green Belt. However, an alternative siting will be accepted if it can be clearly demonstrated that this position would in fact serve to reduce the impact on the openness of the Green Belt.

Inset major previously developed sites

- 4.32 Whilst not villages, a similar approach is applicable to major previously developed sites in relation to whether they should remain washed over or be inset from the Green Belt. National policy requires that land which it is unnecessary to keep permanently open should not be included in the Green Belt. 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 this constitutes the exceptional circumstances required to amend the Green Belt boundary to inset these sites.
- 4.33 Doing so also enables the uses that are currently on site greater flexibility in terms of how the site is utilised and enables greater scope for development or redevelopment, where appropriate. This will ensure they are better able to meet their future needs by removing unnecessary restrictions.

- 4.34 Volume V of the GBCS assesses our major previously developed sites and recommends that a number of sites are suitable for insetting from the Green Belt. We accepted these recommendations in the draft Local Plan and have carried these forward in both iterations of the Regulation 19 Local Plan.
- 4.35 Also consistent between the various versions of the Local Plan, but a change from that recommended in the GBCS is the proposed insetting of Henley Business Park (referred to in the GBCS as BTRE Vokes). At the time Volume V was being prepared, the majority of the built development previously on this site had been demolished in accordance with the planning permission for significant redevelopment for 28,000 sqm of industrial floorspace. Its conclusions in relation to openness were therefore correct however, once the approved scheme is completed, the site would no longer possess this quality and we therefore consider that it too would be unnecessary to retain in the Green Belt. The site is currently under construction.
- 4.36 A further change between the draft Local Plan and the Regulation 19 Local Plan (2016) is that we were no longer identifying a boundary around the major previously developed sites that are remaining washed over by the Green Belt. The scope for infilling or redevelopment of major previously developed sites in the Green Belt has been widened by the NPPF in that it is no longer only applicable to sites that are specifically identified within a local plan and instead apply to all previously developed sites. For this reason, a boundary is not necessary, as the test at planning application stage is the extent to which the openness of the Green Belt can be maintained, in accordance with NPPF paragraph 89 (bullet 6).
- 4.37 There has been a further change in relation to previously developed sites between the two iterations of the Regulation 19 Local Plan. This is at Send Business Centre. This site was not of a sufficient scale to warrant inclusion with the work undertaken in GBCS Volume V. It was identified as an allocation and proposed to be inset in the Draft Local Plan (2014) however, this was on the basis that it formed a logical extension to the adjoining site allocation at Tannery Lane. The proposed allocation on an undeveloped site would enable an extension to Send Business Centre which currently exists within the former Tannery building.
- 4.38 The Tannery Lane allocation was removed in the Regulation 19 Local Plan (2016) due to its location within high sensitivity Green Belt meaning the allocation at Send Business Centre was also removed. However, as a result of representations we have looked at the site again. Although it remains in high sensitivity Green Belt the unique nature of the site and the existing infrastructure in place means it is considered appropriate for development. Due to the current size of the site and number of employees it has been identified as a Significant Employment Site (although at the smallest end of the size range).
- 4.39 Send Business Centre provides serviced and managed office space for long or short-term hire designed for knowledge economy and creative start-ups, ranging from music producers through to computer game developers. Part of their unique offer is very high speed fibre optic resilient internet. Send Business Centre is supplied by two geographically resilient exclusive fibre pipelines scalable to 10GB. This means it is one of fastest and best connected broadband sites outside of the City of London for short term rented office space.

- 4.40 Send Business Centre and Tannery Studios have been supported by the Enterprise M3 (EM3) Local Enterprise Partnership through infrastructure funding. EM3 have provided a 5 year term loan of £156k from their infrastructure fund to improve the internet infrastructure and shore up the wharf. The LEP funding contributed to part of the contractor mobilisation, connection and installation and testing charges to enable geographical resiliency.
- 4.41 In the first round of funding, McClaren and Send Business Centre were the only private sector beneficiaries. As a result of demonstrating successful implementation, they were subsequently approved a £1.3m loan to convert part of the existing buildings and refurbish them into a sound and video hub to support Guildford unique creative digital supply chain. Guildford is at the centre of this unique supply chain with educators including the Academy of Contemporary Music (ACM) and University of Surrey who provide graduates in computer gaming, sound and related fields as well as being at the centre of the video games, virtual effects and animation sectors. Tannery Studios seeks to become the creative hub at the core of this.
- 4.42 There are existing buildings on the site, mainly unused. In the short-term work is underway to convert them into additional studio space with meeting rooms and small offices using the LEP loan. This work is due for completion in early 2018. The combination of location, reliable high-speed broadband and specialist facilities, including sound and video production studios is thought to be one of only a handful in the region. Tannery Studios already accommodates 60 businesses and they hope the loan and their partnerships with the University of Surrey and SETSquared (university incubator) will help identify and mentor start-ups as well as promote their growth. Over the next few years this investment will help create an estimated 400 new direct and indirect jobs, and in the process revitalise a former industrial site.
- 4.43 It is hoped the provision of local facilities and a creative hub will reduce the number of creative graduates from The ACM and University of Surrey lost to London. Pulling together a cluster of creative companies means that they are able to work together and create a collaborative atmosphere of open innovation.
- 4.44 Longer term there is potential for significant expansion of 6-7,000 sq m on to the vacant land adjacent. This is likely to be phased over the plan period. Initial master planning ideas show sensitive design to complement the surroundings.

Inset Traveller and Travelling Showpeople sites

- 4.45 National planning policy requires that we meet the needs of different groups in our community, including travellers and travelling showpeople.
- 4.46 Planning Policy for Traveller Sites (2015), which is national planning policy that carries the same weight as the NPPF, says (para 17):

'Green Belt boundaries should be altered only in exceptional circumstances. If a local planning authority wishes to make an exceptional, limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site, it should do so only through the plan making process and not in response to a planning application. If land is removed from the Green Belt in this way, it should be specifically allocated in the development plan as a traveller site only.'

4.47 Given that:

'Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the 'very special circumstances' justifying inappropriate development on a site within the Green Belt.' (NPPG; 3-034-20140306)

4.48 Any proposed site allocations for traveller pitches or travelling showpeople plots in the Green Belt, need to be inset from the Green Belt to ensure delivery.

4.49 This is further supported by the inspector's report for Solihull Metropolitan Borough Council's Gypsy and Traveller Site Allocation Development Plan Document, in which the report (2014) referenced paragraph 17 of PPTS, as above, and went on to say:

'The use of the word 'If' does not offer a choice of whether or not to make an exceptional limited alteration to the defined Green Belt boundary if identifying sites as suggested on behalf of the Council. Instead, the choice for the local planning authority to make is whether or not it wishes to identify sites in the Green Belt at all. To do so, exceptional circumstances must exist. If it is satisfied that exceptional circumstances exist and the Council therefore wishes to identify sites in the Green Belt, then it is necessary to make an exceptional limited alteration to the Green Belt boundary to do so. As none of the proposed sites are adjacent to the existing Green Belt boundary, then it would be necessary to identify the sites as insets within the Green Belt in this instance.

This must be so. If it were not, any subsequent development of the site as a traveller site would remain inappropriate development. There would be no certainty that the very special circumstances necessary to approve inappropriate development could be demonstrated and so the SADPD would neither be positively prepared or effective in the delivery of accommodation to meet the assessed needs of the gypsy and traveller community.' (para 15 and 16).

4.50 There is a distinct possibility that, should these temporary sites remain in the Green Belt, they may not be granted permanent planning permission. As referenced in relation to Solihull, this uncertainty in relation to deliverability could mean our plan is found unsound.

4.51 We have therefore sought to assess whether there are exceptional circumstances that justify amending Green Belt boundaries in order to inset these sites from the Green Belt. We consider that they do exist as to do so is in accordance with NPPF paragraph 85 (bullet 1) which states that when defining Green belt boundaries we should *'ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development'*.

4.52 We have explored a number of different ways in which to meet traveller need. This includes direct provision by the Council, where appropriate and provision on strategic sites to create mixed, sustainable and inclusive communities. However this is not sufficient to meet needs and we have therefore sought to explore the extent to which traveller sites that currently have temporary planning permission in the Green Belt could be made permanent and where existing permanent sites in the Green Belt could be reconfigured in order to increase accommodation. We have concluded that only a combination of all approaches will enable us to meet need. Failure to meet

need can have direct social and environmental consequences in relation to road side encampment, harm to sensitive rural locations from unauthorised development, overcrowded households and restricted access to services, education and health care.

- 4.53 Volume VI of the GBCS assesses all of our temporary traveller sites, a permanent public traveller site, a permanent travelling showpeople site, a potential infill site (Wyke Avenue) and Council owned land at Home Farm, Effingham. It identifies whether, in accordance with NPPF (paragraph 85, bullet 6) these sites are primarily surrounded by physical features that are readily recognisable and likely to be permanent, which enable them to be inset from the Green Belt.
- 4.54 Whilst Volume VI of the GBCS has assessed which traveller sites have defensible boundaries that enable them to be inset from the Green Belt, the decision to inset is on the basis of ensuring consistency with our strategy for meeting identified requirements for sustainable development. This is different to the justification used for inseting some of our villages and major previously developed sites which was on the basis that they do not contribute towards the openness of the Green Belt and are therefore unnecessary to remain in the Green Belt. This does not apply to traveller sites which, by their small-scale nature, do contribute to the openness of the Green Belt. However, for the purposes of plan-making, this harm does not significantly and demonstrably outweigh the benefits of meeting our identified needs.
- 4.55 We have accepted the recommendations of the study without change for the following sites:
- Cobbetts Close, Normandy
 - Land rear of Roundabout, White Hart Lane, Wood Street Village
 - The Orchard, Puttenham Heath Road, Puttenham
 - Valley Park Equestrian Centre, East Shalford Lane, Shalford
 - Land rear of Palm House Nurseries, Glaziers Lane, Normandy
 - Whittles Drive, Normandy
- 4.56 We have taken a different approach to a number of sites, which we discuss in more detail below. We have also sought to minimise the harm associated with the inseting of these sites by placing additional restrictions on those that we consider are particularly sensitive.
- Rose Lane, Ripley*
- 4.57 This site was not recommended for inseting on the basis that whilst the northern and eastern boundary were defensible, the southern and western boundary were less so and consisted at that time of post and rail fencing only. As a result, the draft Local Plan (2014) did not propose to inset this site from the Green Belt. However, since that time we have reassessed all site options as part of refining our spatial strategy. Since preparation of the study, part of the site has received a new temporary permission on the basis that the temporary harm is outweighed by other considerations, including the particular family circumstances. It is also considered that the southern boundary is now more permanent and defensible since planting has been introduced. Whilst there is some planting on the western boundary, it is sparser in nature. However, given the nature of the remaining three sides, we consider that it

is easily recognisable of the ground and will therefore be an appropriate basis upon which to draw a Green Belt boundary.

- 4.58 We do however acknowledge that in spite of inseting, this site remains sensitive in terms of the impact that development here may have on the surrounding Green Belt and adjoining Conservation Area. For this reason, planning permission for this site will be restricted to the family named in the relevant appeal and any needs arising from that family, given the role of personal circumstances in the granting of the permission. Should any other traveller family wish to occupy this site, planning permission will be required, and we will consider whether the harm to surrounding Green Belt and any other harm is outweighed by the benefits. To further limit the extent to which this site may impact upon the openness of the surrounding Green Belt and the adjoining Conservation area, we propose to restrict the size and height of any ancillary buildings and maintain the site's defensible boundaries.

Four Acre Stables, Normandy

- 4.59 The site was recommended for inseting however the boundaries proposed were significantly greater than the site size in order to follow more defensible nearby features. This land was included within the draft Local Plan (2014) as an allocation with the remainder of the site proposed for safeguarding, for needs beyond the plan period. We no longer consider that safeguarding as a principle is appropriate for Guildford (discussed further below) and have therefore reassessed our approach at this site.
- 4.60 This site has a complex history and is likely to be challenging in planning terms over the plan period. Personal circumstances were a significant contributory factor to the temporary planning permission granted on the site. There have been a number of enforcement issues related to development that has taken place on this land. Whilst we wish to provide sufficient pitches on this site to meet the needs of this family over the plan period, we wish to retain control of the way in which this site is developed and seek to limit any harm to the wider Green Belt. For this reason, we no longer propose to inset the wider site area all the way to the eastern woodland and southern boundary with Aldershot Road. Instead, we consider that there is sufficient planting within the site to form an appropriate southern Green Belt boundary that is capable of being easily recognisable. The eastern boundary follows a ditch/small stream.
- 4.61 We consider that this site area will provide sufficient space for the identified and expected needs whilst preventing further encroachment of the Green Belt to the south, up to Aldershot Road. We consider that development within this area would harm the Green Belt and have an adverse impact on the character of the area.
- 4.62 We also consider that in spite of inseting, this site remains sensitive in terms of the impact that development here may have on the surrounding Green Belt. For this reason, planning permission for this site will be restricted to the family named in the relevant appeal and any needs arising from that family, given the extent to which this was granted based on personal circumstances. Should any other traveller family wish to occupy this site, we will consider whether the harm to surrounding Green Belt and any other harm is outweighed by the benefits. To further limit the extent to which this site may impact upon the openness of the surrounding Green Belt, we propose to restrict the size and height of any ancillary buildings and maintain its defensible boundaries.

Home Farm Effingham

- 4.63 The site was recommended for insetting however the boundaries proposed were significantly greater than the site size in order to follow more defensible features. The draft Local Plan (2014) proposed insetting of the larger area, with smaller site allocations identified within it, to deliver six traveller pitches
- 4.64 As part of the draft Local Plan (2014) consultation, we received specific comments in relation to the proposed insetting boundaries. There were strong concerns about insetting potentially enabling more than six pitches to be delivered over the long term, and the impact of development on this community, where there is positive integration between travellers and the settled community.
- 4.65 Given that the identified need is already living in the area (e.g overcrowded households in Home Farm), and the Council is seeking to provide public pitches on its own land, and retain ownership and management, the most appropriate approach to provision in this area is rural exception pitches, rather than insetting.
- 4.66 Rural exception sites, where 100% affordable housing is provided to meet local needs on sites where housing would not normally be allowed, are supported by PPTS, which says:
- 'If there is a lack of affordable land to meet local traveller needs, local planning authorities in rural areas, where viable and practical, should consider allocating and releasing sites solely for affordable traveller sites. This may include using a rural exception site policy for traveller sites that should also be used to manage applications. A rural exception site policy enables small sites to be used, specifically for affordable traveller sites, in small rural communities, that would not normally be used for traveller sites.'* (Policy D, para 15).
- 4.67 Rural exception sites are appropriate in the Green Belt so it is not necessary to inset the site in order to ensure deliverability. A planning application for six pitches has subsequently been approved and is under construction (ref: 16/P/00428). For this reason the site allocation has been removed in the Regulation 19 Local Plan (2017) as it is no longer necessary.

Green Lane East, Normandy

- 4.68 The site was recommended for insetting however the boundaries proposed were slightly greater in order to follow more defensible nearby features. This land was included within the draft Local Plan (2014) as an allocation however we no longer consider it necessary to allocate in the Proposed Submission Local Plan. We have identified other alternative suitable sites that are capable of meeting our needs in a sustainable way and for that reason do not consider the harm associated with insetting this site is outweighed by the benefits of providing the additional pitches.

Wyke Avenue, Normandy

- 4.69 This land was not proposed to be inset. Given local need, the draft Local Plan (2014) proposed to allocate the land as a rural exception traveller pitch. Since 2014, three new rural exception bricks and mortar houses have been built on land adjoining this

site, to the south. Whilst there remains potentially developable council owned land on this site that could accommodate one pitch, the site is small, and could prove challenging to design and deliver. However, the land remains in the Green Belt, and therefore the possibility of rural exception development on this land exists – whether for a traveller pitch or bricks and mortar housing, and the council will continue to consider the best use of this land in the future. It does not need to be allocated and any future development would contribute to supply as windfall.

Amending Green Belt boundaries

- 4.70 Stage one of the GBCS process was to sub-divide the borough into land parcels. These land parcels were identified on the basis that they were physically and visually contained with strong defensible boundaries. Each land parcel was then assessed against the four relevant purposes of the Green Belt (Purpose 5: to assist in urban regeneration is considered to apply equally to all land parcels).
- 4.71 The GBCS assesses all Green Belt and countryside land beyond the Green Belt, and identifies PDAs that could potentially be developed, should there be insufficient land within the urban areas to meet identified needs, without harming the overall main purpose of the Green Belt. The purpose of this study was to identify a wide range of spatial options that we could consider for allocation through the Local Plan process against a wider set of planning and sustainability considerations.
- 4.72 Further work was undertaken in relation to the GBCS as a result of the review of the evidence base by the Joint Scrutiny Committee in early 2014. This was still being prepared as the draft Local Plan (2014) was being taken through the committee process and so were not fully able to inform this version. In particular, Volume II addendum which included the production of the Green Belt sensitivity map. Each land parcel was colour coded according to the extent to which the land parcel scored against the four Green Belt purposes - green meant it scored 1/4 GB purposes, yellow meant it scored 2/4 and red meant it scored 3/4 or 4/4.

Exceptional circumstances

- 4.73 The NPPF places great weight on the protection of Green Belt and states that Green Belt boundaries should only be altered in exceptional circumstances through the preparation of a Local Plan (paragraph 83). We consider that in general terms there are exceptional circumstances that justify the amending of Green Belt boundaries in accordance with the NPPF, paragraph 83. Our evidence base identifies a high level of need for market and affordable housing (including traveller accommodation) and employment. Given the extent of Green Belt across the borough (89 per cent) and the lack of sufficient suitable and deliverable sites located outside the Green Belt, to not amend boundaries would lead to a significant undersupply of homes compared to the identified needs – approximately half. The consequences of this within Guildford would be to exacerbate the existing affordability issues and have an adverse impact on economic growth in the area, which would lead to unsustainable commuting patterns. Each addition or removal to the Green Belt is also separately considered above and in the Housing Delivery topic paper.
- 4.74 The draft Local Plan (2014) treated all PDAs as reasonable options for development regardless of the extent to which the land parcel within which it sits scored against Green Belt purposes (as shown on the sensitivity map). However, following the

feedback from consultation and the new evidence available, we have reconsidered how Green Belt is used as a constraint. The Regulation 19 Local Plan (2016) sought to give weight to the sensitivity of the Green Belt parcel within which each PDA is located. Whilst PDAs have been identified on the basis that they would not fundamentally harm the main purposes of the Green Belt, there would nevertheless be, in relative terms, more harm caused by allocating sites within land parcels assessed as contributing more towards the purposes of the Green Belt than those judged to be of lesser Green Belt value. In giving greater weight to the sensitivity of the Green Belt, we have therefore sought to ameliorate the consequent impacts on the Green Belt as much as is reasonably possible.

- 4.75 However, given the shortfall early in the plan period and unmet needs within the HMA, we consider it is necessary to consider the potential of each PDA regardless of its Green Belt sensitivity. This is set out in the Housing Delivery topic paper.

Safeguarded land

- 4.76 The NPPF sets out that when amending Green Belt boundaries we should have regard to their intended permanence so that they are able to endure well beyond the plan period. In doing so, we should safeguard sites in order to meet longer-term development needs. Safeguarded land is therefore safeguarded **for** future development, not **from** development.
- 4.77 The draft Local Plan (2014) included approximately 200ha of safeguarded land around some of our villages and at one traveller site. As part of reconsidering our spatial strategy, we have looked again at the issue of safeguarding. The NPPF states at paragraph 85 (bullet 3):
- 'where necessary, identify in their plans areas of 'safeguarded land' **between the urban area and the Green Belt**, in order to meet longer-term development needs stretching well beyond the plan period'* (emphasis added)
- 4.78 The NPPF is therefore explicit that safeguarded land should be on the edge of the urban area. This is consistent with the fundamental aim of Green Belt policy, which is to prevent urban sprawl. We have therefore considered the extent to which safeguarded land could be identified around Guildford urban area. Given the significant constraints that exist to the north and south of the borough (the Thames Basin Heaths Special Protection Area (SPA) and Surrey Hills Area of Outstanding Natural Beauty (AONB)), we are left with a ribbon across the central part of the borough that remains potentially suitable for development.
- 4.79 Safeguarded land is required in order to ensure that, once amended, Green Belt boundaries need not be reviewed at the end of every plan period. It therefore adds certainty and is consistent with their intended permanence. However, given the nature of our borough and the extent to which constraints limit development opportunities, we no longer consider that safeguarding is appropriate for Guildford. In order to be consistent with the NPPF, any safeguarded land would need to be on the edge of Guildford urban area and would need to be of a sufficient scale to negate the need for a Green Belt review until *'well beyond the plan period'*.
- 4.80 Given the limited central ribbon within which development could potentially occur, safeguarded land in Guildford would result in an unsustainable pattern of

development. It would create an oblong-shaped urban area, pushing new urban extensions ever further away from the town centre thereby creating unsustainable communities.

- 4.81 As set out above, further work has also been prepared in relation to the GBCS – a further Volume II Addendum (2017). This analysis serves to indicate the appropriateness of identifying a second ‘layer’ of allocations around the urban areas on the assumption that the currently proposed allocations have been built out. This demonstrates that the sensitivity of this layer has increased and that the land parcels of meeting more of the purposes of the Green Belt. All the land parcels adjacent to the urban area, which are not subject to SPA or AONB constraints, are assessed to be of high sensitivity. Given that any safeguarded land would need to be of a strategic nature, and therefore consist of one or more likely multiple land parcels, this demonstrates that this would lead to significant harm to the Green Belt.
- 4.82 This has implications for our ability to safeguard sufficient land in order to meet longer-term needs. Due to sustainability and Green Belt reasons, there will inevitably be a limit to the extent that Guildford urban area can expand before it would begin to merge with surrounding villages. This would have a detrimental impact on the character of the countryside and our rural communities.
- 4.83 It is also worth considering how this pattern of development compares with our current spatial strategy, which has sought to meet identified needs. Whilst we have prioritised development in and around the urban areas, it has nevertheless been necessary to allocate sites around villages in the countryside. We consider that any future local plan would also need to consider a combination of spatial options if needs were to be met, and is therefore likely to necessitate further Green Belt release around the villages. Given this is incompatible with the definition of safeguarded land, we do not consider that identifying safeguarded land within this plan is likely to fully negate the need to review boundaries as part of the next plan. Given the high level of need that has been identified for Guildford and the surrounding housing market area, which we expect will continue to be the case, it is likely that a more strategic approach to growth or protection will need to be considered, in cooperation with our neighbours.
- 4.84 For these reasons, we have not identified any safeguarded land within the Proposed Submission Local Plan. Whilst not fully consistent with the NPPF, we consider that it is justified.

Land currently designated Countryside beyond the Green Belt

- 4.85 We currently have a small amount of non-Green Belt land (2%) in the west of the borough near Ash and Tongham called Countryside beyond the Green Belt (CBGB).
- 4.86 The GBCS assessed all land including CBGB against the purposes of the Green Belt. Whilst each CBGB land parcel was scored against Green Belt purposes, the resulting score did not necessarily preclude the identification of PDAs. This recognised the fact that the assessment of whether land could appropriately accommodate development took priority over how well it performed against Green Belt purposes, given its non-Green Belt status. This also ensured that these choices could be better made as part of the plan-making process when determining the most appropriate spatial strategy based upon a wider set of considerations. For this reason

there are PDAs identified on some CBGB land parcels, which score highly against many of the Green Belt purposes.

- 4.87 Volume II of the GBCS concluded that land parcel K3 is significantly constrained in environmental capacity terms with no PDAs identified. Due to the lack of PDAs and the extent to which this parcel fulfils the Green Belt purposes (three of the four purposes), this land was recommended as land which would be suitable for inclusion within the Green Belt. The remaining land in parcel K5 not identified as a PDA was also recommended for new Green Belt although this parcel only scored two of the four purposes. The rationale for doing so was included in GBCS Volume II (paragraph 9.25); *'whilst land parcel K5 only scored 2 points when assessed against the Green Belt purposes, it would appear a sensible contribution to the Green Belt beyond land parcel K3 thereby ensuring coalescence between Tongham and Ash Green does not occur'*.

Approach taken in the draft Local Plan (2014)

- 4.88 Given the recommendations of the GBCS in relation to K3 and the extent to which this land fulfils the Green Belt purposes, the draft Local Plan (2014) proposed, as part of altering boundaries, to extend the Green Belt to cover this area.
- 4.89 The draft Local Plan also considered the wider issue regarding the coalescence with Ash Green. Previous consultation undertaken at Issues and Options stage identified local support both for the creation of new Green Belt and for maintaining separation between Ash and Tongham urban area and the village of Ash Green. Whilst it is important that we seek to maximise development opportunities on non-Green Belt areas, it is also important that we consider wider sustainability implications as part of developing our spatial strategy. This includes overall distribution and the need to locate development in sustainable locations that can maintain the vitality and vibrancy of our settlements. Within the spatial hierarchy, locating homes on CBGB is preferential to the release of Green Belt land.
- 4.90 However, within each spatial strategy option, there needs to be a balance. Despite its priority within the hierarchy, there is nevertheless a point at which the harm of directing additional development here will outweigh the benefits of doing so. Thus necessitating the consideration of the next spatial strategy option within the hierarchy until such time that the harm associated with meeting identified needs significantly and demonstrably outweighs the benefits of doing so.
- 4.91 Given the level of development that is already being directed towards Ash and Tongham, much of it outside of the emerging Local Plan process through piecemeal and ad-hoc planning applications, it was considered that some level of protection should be applied within this area. This is consistent with the NPPF, which requires that we take account of the different roles and character of different areas and recognise the intrinsic character and beauty of the countryside (paragraph 17, bullet 5).
- 4.92 The draft Local Plan (2014) proposed an area of separation within the remaining area of land parcel K5 not identified as a PDA. Also included within this area was part of land parcel K8 (west of White Lane/Foreman Road) and K6 (north of the dismantled railway line), both identified as part of wider PDAs in the GBCS. On balance, it was considered that the benefit of providing a relatively small number of additional homes

in this area did not outweigh the harm associated with extending the Ash and Tongham urban area to incorporate Ash Green village. Identifying this land as an area of separation sought to preserve the undeveloped parts of this area thereby visually maintaining a degree of separation.

4.93 Whilst this area of separation did include some existing ribbon development along Ash Green Road, which is considered to currently form part of Ash Green village, this area is separate from the village core, located as one moves south of the dismantled railway. Whilst this ribbon development is considered to form part of Ash Green village given its current surrounding context, once the strategic development location around Ash and Tongham is built out and extended towards this area of Ash Green, it is likely to functionally and visually look more towards Ash and Tongham urban area.

4.94 In addition to these designations, the draft Local Plan also included countryside land west and south of Ash and Tongham urban area. This policy sought to restrict development to that which required a countryside location, involved the reuse or appropriate redevelopment of existing buildings or was required to support the rural economy.

Approach taken in the Proposed Submission Local Plan

4.95 Volume II addendum also amended the way in which the land parcels were scored in relation to two Green Belt purposes:

- Purpose 3 – To assist in safeguarding the countryside from encroachment
- Purpose 4 – To preserve the setting and special character of historic towns

4.96 As a result of the revised methodology, land parcel K3 was reassessed to score positively against two (rather than three) of the four Green Belt purposes and K5 was reassessed to score positively against three (rather than two) of the purposes.

4.97 Alongside the additional work undertaken in response to the Joint Scrutiny Committee, was the preparation of Volume V of the GBCS. This study sought to assess a number of further spatial strategy options, one of which was reconsideration of the extent to which CBGB land could be utilised to meet development needs given its non-Green Belt status. The results of this work identified one additional PDA within land parcel K3.

4.98 Both these documents were published in April 2014, by which stage the spatial strategy for the draft Local Plan had been formed and there was insufficient time to be able to fully incorporate all the findings from the updated evidence.

4.99 In defining the spatial strategy for the Regulation 19 Local Plan (2016), we reassessed all sites. In doing so, we also reconsidered how we could achieve sustainable development within Ash and Tongham whilst maintaining the separate identity of Ash Green village. We still consider that Ash Green Road will functionally and visually look towards the expanded Ash and Tongham urban area once it is built, and therefore propose that this land, up to the dismantled railway, be included in the Ash and Tongham urban area instead of identified as an area of separation. We nevertheless wish to acknowledge that this area has historically formed part of Ash Green village. For this reason, whilst it is proposed to be included within Ash and Tongham urban area, site allocation A29 requires that proposals for the land west of

Ash Green Road should respect the historical context of this area and provide an appropriate green buffer to maintain a sense of separation between it and the properties along Ash Green Road.

- 4.100 Regarding land south of the railway, we still consider it appropriate to maximise the use of CBGB land where it is sustainable to do so. For this reason, we still propose to allocate the small site to the east of White Lane. Given the location of this site and the visual connection it already has with the land north of the dismantled railway, it is also likely to look towards the urban area once it has been built up to the railway line. Accordingly, we propose to also include this land within Ash and Tongham urban area.
- 4.101 We still believe that there is strong merit and good planning reasons in seeking to maintain a degree of separation between Ash and Tongham urban area and the core of Ash Green village. We have also considered the additional PDA identified in K3. This site, for approximately 600 homes, is located within land currently designated as an Area of Great Landscape Value (AGLV). This land is designated in recognition of its landscape value and role in buffering the Surrey Hills Area of Outstanding Natural Beauty (AONB). There is a commitment by Natural England to undertake an AONB boundary review in early 2018. The Surrey Hills AONB Natural Beauty Evaluation Report carried out by Hankinson Duckett Associates (October 2013) identifies a number of AONB candidate areas. Part of land parcel K3 is recommended for AONB inclusion, although this does not extend into the PDA. However, the candidate areas and individual boundaries should not be considered definitive until the review has been formally progressed through the statutory process. The identification of this land as an AONB candidate area does not give it AONB planning status however the AGLV, as a local designation present across many Surrey authorities, will remain until such time as the AONB boundary review is complete. It is therefore a consideration when assessing where development should be located.
- 4.102 On balance, we do not consider that the additional PDA at K3 is appropriate for development. Whilst developing CBGB appears higher in our spatial hierarchy, we do not consider it appropriate to allocate any further development above that already proposed in CBGB. Due to the lesser degree of protection that CBGB currently affords together with the fragmented ownership of this land, development within the CBGB is already and will continue to be delivered in a piecemeal way. However, given its non-Green Belt status and preference in the spatial hierarchy, it is considered appropriate for SA testing purposes to include this site for 600 homes within the alternative spatial strategy that seeks to meet some of the unmet needs within the HMA.
- 4.103 This small scale and incremental approach to development within this area means that homes are being delivered here without the other mix of uses and supporting infrastructure that sites of this overall scale would normally deliver. This is particularly due to our current inability to pool contributions until we have a Community Infrastructure Levy (CIL) in place. We expect that planning applications in this area are likely to continue to come forward ahead of the new Local Plan and accompanying CIL, which will further exacerbate this issue.
- 4.104 The harm associated with providing more homes here is considered to significantly and demonstrably outweigh the benefits of doing so. For these reasons, the both iterations of the Regulation 19 Local Plan retain all of K3 as new Green Belt. The

GBCS (Volume II) recommended that the remainder of land parcel K5, not identified as a PDA, up to the dismantled railway line should be designated as Green Belt. The justification of doing so is increased given this parcel has been reassessed to score three of the four Green Belt purposes. We therefore consider it appropriate to extend the proposed Green Belt boundary to include this land. The dismantled railway forms a strong, defensible and easily recognisable Green Belt boundary and extending the designation to cover this area will prevent the merging of Tongham and Ash Green, checks the unrestricted sprawl from these areas and safeguards the countryside from encroachment.

- 4.105 As a result, the only remaining CBGB left in this area is the woodland between the proposed edge of the urban area and the main built up area of Ash Green (south of Ash Green Lane East). Given the desire to protect the separate identity of Ash Green village, we consider there are exceptional circumstances to warrant the extension of the Green Belt further to cover the land to the north of the village core. This would join the Green Belt which currently extends up both the east and west side of Ash Green village. Doing so would serve to maintain the visual and physical separation that currently exists as one travels up White Lane. The Green Belt extension here would follow the dismantled railway and the southern boundary of the site allocation east of White Lane. These features all constitute defensible boundaries. It is also consistent with the NPPF, which states that when amending Green Belt boundaries we should ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development.

Consistency with the NPPF

- 4.106 Given the reasons set out above, it is considered that the exceptional circumstances exist for altering Green Belt boundaries in this area and extending the designation is in accordance with paragraph 83 of the NPPF. We do not consider that in this instance we are creating new Green Belt for which the criteria differ (NPPF, paragraph 82). The Metropolitan Green Belt within which Guildford borough sits covers over 500,000 hectares. The extension of approximately 200 hectares equates to a change of some 0.04 per cent. This is not considered to be of a scale that constitutes the creation of new Green Belt particularly when the NPPF refers to it in the context of planning for larger scale development such as new settlements or major urban extensions, neither of which is applicable in this instance. This is also consistent with paragraph 82, which states that the general extent of Green Belts across the country is already established. This suggests that Green Belt boundaries can be altered to both exclude or include land so long as the exceptional circumstances and requirements of the NPPF are demonstrated.
- 4.107 The NPPF goes on to say (paragraph 81) that once Green Belts have been defined, councils should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. Part of the extended Green Belt land is proposed to be designated as Suitable Alternative Natural Greenspace (SANG) which will be retained as open space in perpetuity. This is consistent with the objectives of the NPPF to enhance the beneficial use of the Green Belt.

New Countryside designation

- 4.108 The only remaining CBGB remaining and not proposed to be designated Green Belt is the land to the south and west of Ash and Tongham urban area, within the Blackwater Valley. This land is constrained from development by flooding issues but is also an important strategic gap between Ash and Tongham urban area and the Aldershot built up area in neighbouring Rushmoor borough. The Regulation 19 Local Plan (2017) continues to include a policy for this area (Policy P3). It has been strengthened since the draft Local Plan (2014) as it now also seeks to maintain an appropriate degree of visual and physical separation between the two urban areas. This will help ensure that this land continues to provide an important setting to Ash and Tongham and that it retains its separate and distinct identity and character as an urban area on the edge of Surrey.

Comments received on draft policies

- 4.109 As part of the draft Local Plan (2014) consultation, we received many comments some of which were specifically in relation to the proposed Green Belt or identified boundaries. We have responded to these comments in the Consultation Statement that was published alongside the Regulation 19 Local Plan (2016). This also details where we have made changes to the plan in response to comments received at that stage.
- 4.110 We received a significant number of responses to the Regulation 19 Local Plan (2016) and, where appropriate, these have helped inform changes in the Regulation 19 Local Plan (2017). The rationale behind the key changes to the strategy have been set out in this and other supporting topic papers. An updated Consultation Statement which identifies and responds to all major issues will be prepared and published to support the Submission Local Plan.

5 Local Plan Policy Approach

- 5.1 The following section sets out the Local Plan approach following consideration of the evidence base including planning law, policy, guidance, facts, figures, research and the public and Councillors feedback and professional opinions.
- 5.2 The Proposed Submission Local Plan includes a policy on Green Belt (P2) and one on Countryside (P3).
- 5.3 The following villages are proposed to be inset from the Green Belt: Chilworth, East Horsley, Effingham, Fairlands, Flexford, Jacobs Well, Normandy, Peasmarsh, Ripley, Send, Send Marsh/ Burnt Common, Shalford, West Horsley and Wood Street Village.
- 5.4 The following villages are proposed to remain washed over by the Green Belt and have an identified settlement boundary: Albury, Compton, East Clandon, Gomshall, Holmbury St Mary, Peaslake, Pirbright, Putterham, Shere, West Clandon and Worplesdon. In addition to this, parts of East Horsley (south of the A246) and Ripley (north of the High Street) have been included within an identified settlement boundary.
- 5.5 The following villages are proposed to remain washed over by the Green Belt and are listed as villages within which limited infilling may be appropriate: Artington,

Eashing, Farley Green, Fox Corner, Hurtmore, Ockham, Seale, Shackelford, The Sands, Wanborough and Wisley.

- 5.6 The following major previously developed sites are proposed to be inset from the Green Belt: Henley Business Park, HM Prison Send, Keogh Barracks, Mount Browne, Pirbright Barracks, Pirbright Institute, Send Business Park and the University of Law Guildford.
- 5.7 The following traveller sites are proposed to be inset from the Green Belt: Land at Cobbetts Close, Normandy; Land at The Paddocks, Rose Lane, Ripley; Four Acres Stable, Normandy; Land rear of Roundabout, Wood Street Village; The Orchard, Puttenham; Valley Park Equestrian Centre, Shalford; Land rear of Palm House Nurseries, Normandy; Whittles Drive, Normandy.
- 5.8 The Proposed Submission Local Plan proposes to amend the Green Belt boundary in order to accommodate our development needs. It also proposes an extension to the Green Belt boundary between Ash and Tongham urban area and Ash Green village. The land to the south and west of Ash and Tongham urban area is proposed to be designated as Countryside.

6 Next steps

- 6.1 The Proposed Submission Local Plan: strategy and sites (June 2017) – referred to as the Regulation 19 Local Plan (2017) for shorthand in this topic paper – will be subject to public consultation for 6 weeks from 9 June to 24 July 2017. This public consultation will be focused solely on the proposed changes made to the Draft Local Plan 2016; these changes are identified as such in the Draft Local Plan 2017. This is described as a targeted consultation.
- 6.2 Following this, all comments and representations relating to changes made to the 2016 Draft Local Plan during the consultation period will be considered. Consideration will then be given to any amendments deemed to be necessary to the plan and a decision taken on whether to consult further or to formally submit the plan to the Secretary of State.
- 6.3 For more information please visit: www.guildford.gov.uk/newlocalplan.