

Topic paper: Green Belt and the Countryside

December 2017

To accompany Guildford borough Submission Local Plan: strategy and sites



GUILDFORD
BOROUGH

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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 Submission Local Plan: strategy and sites document. Each topic paper will look at the relevant national and local guidance that informs the Submission Local Plan. Topic papers explain how the strategy has developed, in addition to the information, evidence and feedback that have 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. Topic papers have been produced to accompany the Submission 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 National Planning Practice Guidance (NPPG).
- 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 Paragraph 85 of the NPPF states that *'when defining boundaries, local planning authorities should:*
- i. ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;*
 - ii. not include land which it is unnecessary to keep permanently open;*
 - iii. 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;*
 - iv. 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;*
 - v. satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and*
 - vi. 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 which 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 (PPTS). At paragraph 15, the PPTS 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, 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 and 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 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; and
- 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 but surrounded by the Green Belt is the Guildford urban area itself. We also have an area of countryside in the west of the borough surrounding the Ash and Tongham urban area, including the village of Ash Green, which is non Green Belt. This is currently referred to as Countryside Beyond the Green Belt (CBGB). 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 plan setting out 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 Local Plan policies.

- 2.14 There is currently one adopted Neighbourhood Plan (Burpham), one emerging, post-examination Neighbourhood Plan (Effingham), and one progressing towards examination (East Horsley) within the borough. Six other Parish Councils are also currently producing Neighbourhood Plans.
- 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 examination, which has resolved any remaining objections, and is progressing towards a referendum. The East Horsley neighbourhood plan is progressing towards examination and is accorded very little weight at this stage.
- 2.17 No policy conflicts have been identified within either emerging neighbourhood plan and the policy approach in the Submission Local Plan: strategy and sites.
- 2.18 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, in addition to 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 the extent to which land parcels across the borough met the different purposes of the Green Belt. It went on 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 – inseting 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 Volume II addendum amended the way in which the land parcels were assessed in relation to two Green Belt purposes. It also reconsidered the identification of PDAs around Guildford urban area. Volume II involved a sieve mechanism, whereby those parcels that were assessed as being the most sensitive against Green Belt purposes were not considered appropriate for development. Given the sustainability merits of development around the urban area, Volume II addendum provided a more detailed consideration of the development potential of all urban edge parcels. Decisions regarding the plan's spatial strategy could then be informed against a wider set of considerations.

3.8 Further information and copies of the evidence base documents are available on the Councils 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 consultations. It highlights the main areas relevant to formulating a Local Plan policy approach for Green Belt and countryside in our borough.

Consultation feedback

4.2 As part of developing the Local Plan we have consulted at the following main stages:

- Regulation 18 Issues and options (October 2013) – which identified a range of issues and potential options for how we should plan for Guildford borough
- Regulation 18 Draft Local Plan (July 2014) – which outlined our preferred approach for planning for Guildford borough
- Regulation 19 Proposed Submission Local Plan (June 2016) – which included the policies and sites that we had intended to submit for examination
- Regulation 19 Proposed Submission Local Plan (June 2017) – a targeted consultation on proposed changes to policies and sites

4.3 Comments received as part of the consultation stages have been taken into account in the preparation of the Local Plan. The main issues raised in all four consultations, together with our response, is set out in the accompanying Consultation Statement.

Changes from previous Green Belt national policy

- 4.4 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.
- 4.5 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)
- 4.6 There are two aspects to consider within this paragraph. 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 (or does not make) 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.
- 4.7 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 insetting, 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).
- 4.8 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 amending Green Belt boundaries to inset selected villages.

Villages

Inset villages

- 4.9 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 boundaries are clearly defined, 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.

- 4.10 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 policy tests set in NPPF paragraph 89, bullets 3 and 4.
- 4.11 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 to the surrounding context. In this way, development would still be controlled. However, only in relation to matters such as these, not in relation to Green Belt policy considerations.
- 4.12 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.
- 4.13 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.
- 4.14 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.
- 4.15 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. These factors are considered to remain relevant and we therefore continue to propose in the Submission Local Plan that Gomshall and Shere are not inset from the Green Belt.
- 4.16 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 on the basis that 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 utilise physical features that are readily recognisable and likely to be permanent. More detail on where amendments have been made is set out below.

- 4.17 East Horsley: the Green Belt boundary has been extended to run along the tree belt to the west of Fangate Manor Farm. This forms a stronger and more continuous defensible boundary, and creates a clearer western edge to the village with open Green Belt beyond.
- 4.18 Effingham: Whilst the GBCS recommends that the land between Browns Lane and Manorhouse Lane should be inset, the study does conclude at Stage 3 that there are visual connections to open land within the Green Belt located across King George V playing fields (which forms the majority of this area). For this reason we consider that there is justification to exclude this open land from the inset boundary.
- 4.19 Fairlands: the GBCS recommends that the Green Belt boundary should run from the north from Aldershot Road to Fairlands Road and then extend around the properties located to the east of Fairlands Road. The Green Belt boundary has been extended to abut the inner edge of the Aldershot Road along the entire length. This helps to ensure that the boundary is readily recognisable.
- 4.20 Flexford: The GBCS recommends that the Green belt boundary follows, for the most part, the railway line to the north of the village. To help ensure that the boundary is readily recognisable, this has been extended to run along the railway line for the entire length of the northern edge of the village. The Green Belt boundary has also been extended at the south-western corner of the village to include the plot of land at Westholme, located behind the properties on Green Lane East. The northern edge of this plot consists of a thick tree belt which constitutes a more defensible Green Belt boundary.
- 4.21 Ripley: The GBCS recommends that the Green Belt boundary to the north of the village follows a footpath within Ripley Green and then hedgerows and fencelines located to the north of residential development on Ripley High Street. The footpath does not in its current form constitute a physical feature that is readily recognisable. For this reason the Green Belt boundary has been amended to run along Newark Lane and the High Street. The built up part of the village that is now excluded from the Green Belt has been included within the identified settlement boundary (see section on 'limited infilling in villages').
- 4.22 Send: The GBCS recommends that the Green Belt boundary runs along the woodland edge between Potters Lane and Sandy Lane, thereby excluding the lakes from the Green Belt. This has been amended to follow the woodland/tree belts along the edge of the lake. This forms a defensible and easily recognisable boundary.
- 4.23 Send Marsh: The GBCS recommends that the Green Belt boundary runs along a tree belt north of Send Marsh Road to the western edge of the properties on Danesfield. This does not constitute a physical feature that is readily recognisable. The Green Belt boundary has been amended to follow the tree belt along the access road off Polesden Lane, and the tree belt and fence line south and west of Danesfield. This helps to ensure that the boundary is readily recognisable.
- 4.24 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 (now called Policy ID4). This supersedes Local Plan 2003 Policy R5, which currently only identifies open space in urban areas. It has been expanded to include land in inset villages that is of public value.

- 4.25 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 (2016) and will be protected in line with the NPPF. Further land within the inset villages that has public amenity value is identified in the Assessment of Sites for Amenity Value (2017) and is designated on the Policies Map as Open Space. This land is also protected in line with the NPPF. This ensures that development does not occur on land that is of public value.
- 4.26 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 subsequently been broadened to apply to the character and design of **all** new development. The policy still retains a list of considerations that are considered to be particularly pertinent to village developments, however this has also 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

- 4.27 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. Any planning applications within these villages would therefore continue to be considered against national Green Belt policies.
- 4.28 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 being slowly eroded over time. In these villages, only development listed in NPPF paragraphs 89 and 90 is considered appropriate unless very special circumstances are demonstrated.

Limited infilling in villages

- 4.29 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 but included an identified settlement boundary within which the proposed Policy 9 (now called Policy P2) stated that limited infilling could occur, in accordance with paragraph 89 (bullet 5) of the NPPF.
- 4.30 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.

- 4.31 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).
- 4.32 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.
- 4.33 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 have principally used 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 are defined as such in the Submission Local Plan.
- 4.34 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, whether or not the proposal constituted limited infilling.
- 4.35 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.
- 4.36 The 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 West Horsley (north), and Ripley. Whilst the majority of the settlements are proposed to be inset from the Green Belt, a sufficient proportion of the built up area of each village remains which clearly forms part of the village. We consider that there is justification, as set out above, for identifying the wider extent of the village with an identified settlement boundary. For East Horsley and West Horsley (north) this is land south of the A246 and for Ripley it is land north of Newark Lane and the High Street.

Extensions or alterations

- 4.37 Extensions or alterations of a building are also an appropriate exception, provided that development would not result in 'disproportionate additions' over and above the size of the original building. This restriction ensures that the openness of the Green

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

Belt is maintained within those villages that are considered to make an important contribution to the openness of the Green Belt.

- 4.38 Whilst the 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.
- 4.39 The 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.'

- 4.40 The interpretation of the exact meaning of the second part of the sentence varies amongst planning inspectors. The key point being whether, if there was no building in existence on 1 July 1948 and one subsequently gets built, before being replaced, the baseline from which we measure 'disproportionate' is the first building built, or the replacement building.
- 4.41 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

- 4.42 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 for 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 would be acceptable if it can be clearly demonstrated that this position would in fact serve to reduce the overall impact on the openness of the Green Belt.

Inset major previously developed sites

- 4.43 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 that 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.

- 4.44 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.
- 4.45 Volume V of the GBCS assesses our major previously developed sites and recommends that a number of sites are suitable for inseting from the Green Belt. These were included as proposed inset major previously developed sites in the draft Local Plan (2014) and have been carried forward through to the Submission Local Plan.
- 4.46 Also consistent between the various versions of the Local Plan, but a change from what is recommended in the GBCS, is the proposed inseting 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 sq. m of industrial floorspace. Its conclusions in relation to openness were therefore correct at that time. However, once the approved scheme is completed, the site would no longer possess this quality and we therefore consider that it would be unnecessary to retain in the Green Belt. The site is currently under construction.
- 4.47 We have received detailed representations in relation to two sites, Bisley Camp and Merrist Wood College, objecting to the recommendations within the GBCS that they should remain washed over by the Green Belt. Pegasus, the consultants who produced the GBCS, has considered these comments to assess whether the recommendations should be amended. Nevertheless, in both instances, it is concluded that their open character justifies their ongoing retention within the Green Belt. The representations, together with Pegasus' re-assessment, are included in Appendix 2.
- 4.48 The draft Local Plan (2014) identified a boundary around those major previously developed sites that are proposed to remain washed over by the Green Belt. This is no longer considered necessary and is not included in the Submission Local Plan. 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. Instead, it applies to all previously developed sites, subject to the development not having a greater impact on the openness of the Green Belt.
- 4.49 Another change in approach in relation to previously developed sites has occurred at Send Business Centre. This site was not of a sufficient scale to warrant assessment as part of the GBCS Volume V. Land at Send Business Centre was identified as an allocation (site allocation 67) 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 (site allocation 75). The proposed site allocation consisted of an undeveloped piece of land that would enable an extension to Send Business Centre, which currently exists within the former Tannery building.
- 4.50 However, the spatial strategy and site allocations were reviewed as part of the Proposed Submission Local Plan (2016) and were considered through the Sustainability Appraisal. The site no longer accorded with the proposed spatial strategy, it is located within high sensitivity Green Belt and was no longer considered appropriate. However, the site promoters objected to this amendment arguing that Send Business Centre meets the criteria for a Strategic Employment Site (because of the current size of site and number of employees). The site promoter proposed that

the site therefore be designated as such (rather than a Locally Significant Employment Site).

- 4.51 Submission Local Plan Policy E2 directs proposals for new office and research & development to sequentially preferable locations. Third in the sequentially preferable hierarchy are Strategic Employment Sites. For this reason, it would not be appropriate to designate Send Business Centre a Strategic Employment Site should the site remain washed over by the Green Belt, given the constraints to development that the Green Belt designation imposes.
- 4.52 However, upon further reflection we consider that whilst the site is located within high sensitivity Green Belt, the unique nature of the site, coupled with the existing digital infrastructure serving the site, Send Business Centre is an appropriate location for further employment development. The Submission Local Plan proposes to inset Send Business Centre and the adjoining land from the Green Belt, designating it as a Strategic Employment Site. We consider there are a number of factors that together constitute the exceptional circumstances to justify removing it from the Green Belt.
- 4.53 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 the fastest and best-connected broadband sites outside of the City of London for short-term rented office space.
- 4.54 Send Business Centre and Tannery Studios have been supported by the Enterprise M3 (EM3) Local Enterprise Partnership (LEP) through infrastructure funding. EM3 have provided a 5-year 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.
- 4.55 In the first round of funding, McLaren and Send Business Centre were the only private sector beneficiaries. Demonstrating successful implementation, Send Business Centre 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's 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.
- 4.56 There are existing buildings on the site, which are 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.

- 4.57 It is hoped that 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.
- 4.58 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

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

- 4.61 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)

- 4.62 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.

- 4.63 This is further supported by the inspector's report for Solihull Metropolitan Borough Council's Gypsy and Traveller Site Allocation Development Plan Document (SADPD), 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.' (paragraphs 15 and 16).

- 4.64 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.
- 4.65 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 exceptional circumstances 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*'.
- 4.66 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.
- 4.67 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.
- 4.68 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.
- 4.69 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.

- 4.70 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

- 4.71 This site was not recommended for inseting on the basis that whilst the northern and eastern boundaries were defensible, the southern and western boundaries were less so, consisting 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.

- 4.72 However, we 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

- 4.73 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.
- 4.74 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 has 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.

- 4.75 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.
- 4.76 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 the site's defensible boundaries.

Home Farm Effingham

- 4.77 The site was recommended for inseting. However, the boundaries proposed were significantly greater than the site size in order to follow more defensible features. The draft Local Plan (2014) proposed inseting of the larger area, with smaller site allocations identified within it, to deliver six traveller pitches
- 4.78 As part of the draft Local Plan (2014) consultation, we received specific comments in relation to the proposed inseting boundaries. There were strong concerns about inseting 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.
- 4.79 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 inseting.
- 4.80 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, paragraph 15).
- 4.81 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 was removed in the Regulation 19 Local Plan (2017).

Green Lane East, Normandy

- 4.82 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 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 that the exceptional circumstances exist to justify amending Green Belt boundaries to inset this site.

Wyke Avenue, Normandy

- 4.83 The site was not recommended for insetting. 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

- 4.84 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).
- 4.85 The GBCS assesses all Green Belt and countryside land beyond the Green Belt, and identifies Potential Development Areas (PDAs) and Potential Major Development Areas (PMDAs) that could potentially be developed, should there be insufficient land within the urban areas to meet identified needs, without harming the main purposes of the Green Belt. The aim of this study was to identify sites consistent with 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.
- 4.86 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

- 4.87 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 borough 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.

4.88 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 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.

4.89 However, given the shortfall early in the plan period and unmet needs within the HMA, we consider that it is still 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

4.90 The NPPF states 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 (paragraph 83). 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.

4.91 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 when preparing the Regulation 19 Local Plan (2016), we looked again at the issue of safeguarding and its relevance for Guildford borough. 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)

4.92 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.

- 4.93 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 do not 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'*.
- 4.94 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 even further away from the town centre and creating unsustainable communities.
- 4.95 We also consider that we are unable to meet the second requirement, namely safeguarding sufficient land in order to meet longer-term needs. Leaving aside the sustainability concerns regarding the pattern of growth that this form of development is likely to take, there will inevitably be a limit to the extent that the 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.
- 4.96 This pattern of development is very different when compared to 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 and create a new settlement 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 in any case 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.
- 4.97 For these reasons, we have not identified any safeguarded land within the Submission Local Plan. Whilst not fully consistent with the NPPF, we consider that it is justified.

Land currently designated Countryside beyond the Green Belt

- 4.98 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).
- 4.99 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 this 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, from the beginning, PDAs were identified on some CBGB land parcels, which score highly against many of the Green Belt purposes.

- 4.100 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 inclusion within the 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'*. See Appendix 1 for a map of the land parcels in this area.

Approach taken in the draft Local Plan (2014)

- 4.101 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.
- 4.102 The draft Local Plan also considered the wider issue regarding the coalescence with Ash Green. Previous consultation undertaken at the 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.
- 4.103 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 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.
- 4.104 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).
- 4.105 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.

- 4.106 Whilst this area of separation did include some existing ribbon development along Ash Green Road, which does 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 forms part of Ash Green village, 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.
- 4.107 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 Submission Local Plan

- 4.108 Part of the scope of Volume II addendum was to amend the way in which 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
- 4.109 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.
- 4.110 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.
- 4.111 Both these documents were published in April 2014, by which stage the spatial strategy for the draft Local Plan (2014) had been formed and there was insufficient time to be able to fully incorporate all the findings from the updated evidence.
- 4.112 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 does form 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. It also requires the provision of an appropriate green buffer to maintain a sense of separation between any new development and the properties along Ash Green Road.
- 4.113 Regarding the PDA south of the dismantled 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 (site allocation A28). 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, this land is also included within Ash and Tongham urban area.

- 4.114 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.
- 4.115 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.
- 4.116 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.
- 4.117 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 proposed 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 for 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 village, checks the unrestricted sprawl from these areas and safeguards the countryside from encroachment.

4.118 As a result, the only remaining CBGB left around Ash Green village is the woodland between the proposed southern 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 north of the village core. This would join the Green Belt which currently already extends up the eastern side of Ash Green village and is proposed (as set out above) to extend up the western side. Doing so would also 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 site allocation A28. 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

4.119 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.

4.120 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 has permission to be designated as Suitable Alternative Natural Greenspace (SANG). This measures approximately 16ha and 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

4.121 Remaining CBGB that is not proposed as either a site allocation or new Green Belt comprises 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 and the presence of the A331 but is also an important strategic gap between Ash and Tongham urban area and the Aldershot built up area in neighbouring Rushmoor borough. Policy P3 in the Submission Local Plan 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.

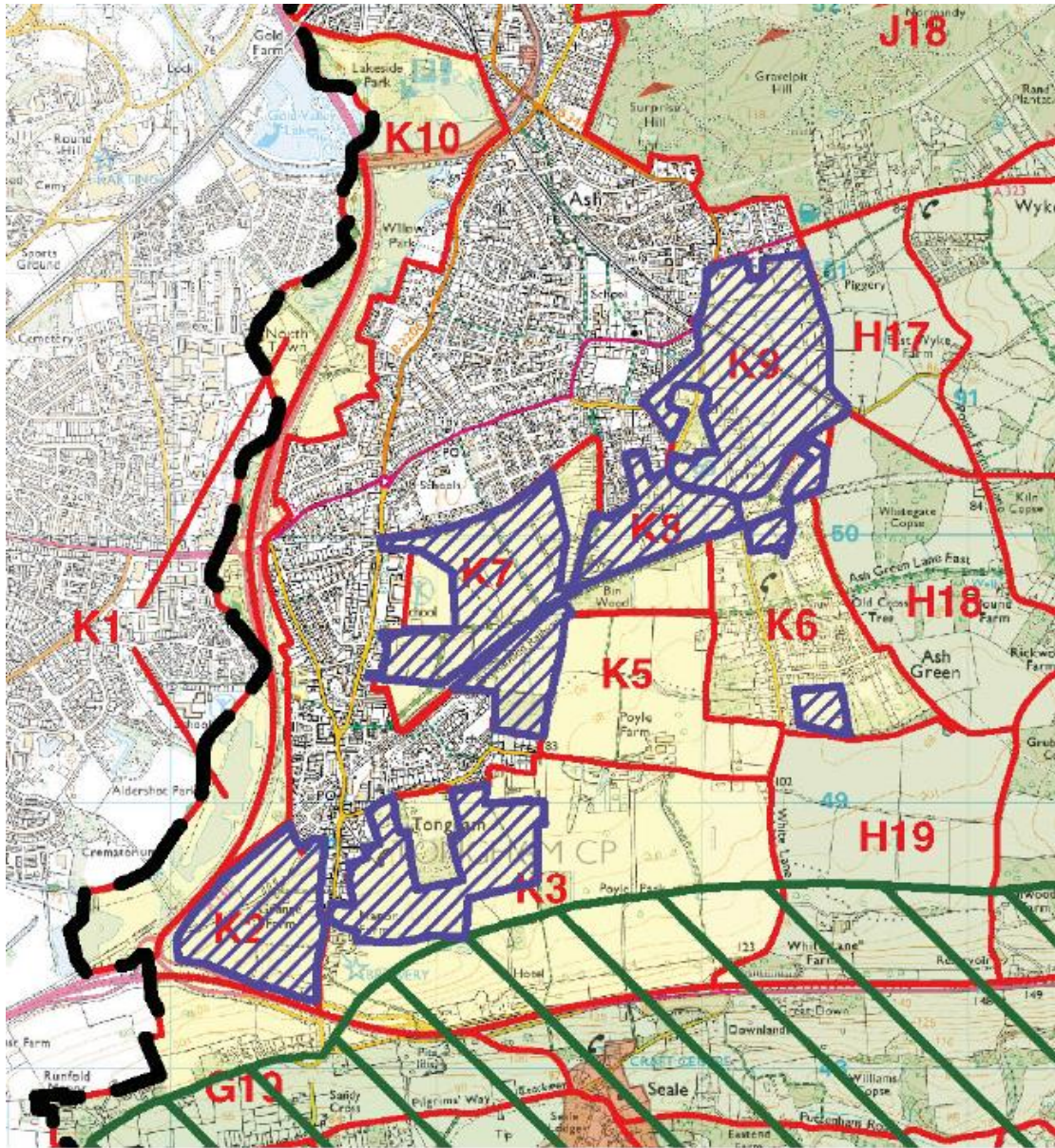
5 Local Plan Policy Approach

- 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, Puttenham, Shere, West Clandon and Worplesdon. East Horsley and West Horsley (north) and Ripley have been included within an identified settlement boundary in addition to having part of the village inset.
- 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, Shackleford, 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 Centre 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 draft Local Plan strategy on Green Belt and Countryside responds to the requirements of national policy and the results of our evidence.
- 6.2 This topic paper accompanies the Submission Local Plan: strategy and sites that is submitted to the Secretary of State in December 2017. For more information please visit: www.guildford.gov.uk/newlocalplan.

Appendix 1 – GBCS extract at Ash and Tongham



Appendix 2: Reassessment of Bisley Camp and Merrist Wood College

GUILDFORD BOROUGH GREEN BELT AND COUNTRYSIDE STUDY

VOLUME V – ADDENDUM FEB 17

ON BEHALF OF GUILDFORD BOROUGH COUNCIL

Pegasus Group

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PLANNING | **DESIGN** | **ENVIRONMENT** | **ECONOMICS**

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APPENDIX 3: MERRIST WOOD REPRESENTATION

APPENDIX 4: MERRIST WOOD DEVELOPMENT FOOTPRINT PLAN

1. INTRODUCTION

- 1.1 This Addendum has been prepared in response to representations received on the Council's Proposed Submission Local Plan (Regulation 19), relating to Volume V of the Green Belt & Countryside Study. In particular, the representations relate to the assessment of two of the Major Previously Developed Sites within the Green Belt, these being Bisley Camp and Merrist Wood College.
- 1.2 The representations suggested that the assessments within Volume V were not undertaken correctly for the sites in question, and if they had been, the sites would have been recommended for removal / insetting from the Green Belt.
- 1.3 Having received and considered the representations, Guildford Borough Council instructed Pegasus Group in December 2016 to look again at the issues raised, to assess whether there was merit in the representations' suggestion that the sites at Bisley Camp and Merrist Wood College should be recommended for insetting or removal from the Green Belt.
- 1.4 To inform such assessment further site visits were undertaken in December 2016.

2. Bisley Camp

Summary of representation

- 2.1 The full representation, submitted by WYG in July 2016 on behalf of the National Rifle Association (NRA), can be referred to at Appendix 1. This includes reference to a previous submission in 2014 by Alliance Planning on behalf of the NRA, commenting on the Green Belt and Countryside Study (GBCS). This is summarised as follows;
- 2.2 Whilst the methodology and approach in the GBCS is supported, the assessment of Bisley Camp undervalued and mis-assessed the character and features of the developed area of the Camp. This is based upon the assessment not considering the areas of mobile homes and caravans present on the site. If such buildings are included, the built footprint of the site would rise by 15-20%, meaning it would be up to 35-40%, rather than the 20% referred to in the GBCS. At 40% the site has a very similar built footprint coverage to other major developed sites identified for inseting from the Green Belt, and should be recommended accordingly.
- 2.3 Reference was also made to the site's limited contribution to the Green Belt and its openness, and to the presence of defensible boundaries.

Re-Assessment

- 2.4 Stage 1 of the assessment of Major Previously Developed Sites within Vol V (Section 20) of the GBCS, considers whether the sites possess an open character. If a site does possess an open character, it is assumed that the Green Belt designation remains appropriate, as indicated at paragraph 86 of the NPPF. If a site does not possess an open character, then the assessment moves to Stages 2 and 3.
- 2.5 Stage 2 asks if environmental constraints would preclude the potential redevelopment of the site, whilst Stage 3 considers whether there are sufficient defensible boundaries to enable inseting in accordance with the NPPF, taking account of the Green Belt purposes.
- 2.6 It is therefore necessary to undertake the Stage 1 assessment, and only if that indicates there is not an open character, is it necessary to undertake the Stage 2 and 3 assessments.

- 2.7 With regards Bisley Camp and the submitted representation, consideration needs to be given to whether the mobile homes / caravans should be included as part of the built footprint for the site, and if they are included, whether such inclusion would change the open character of the site or not.
- 2.8 For clarification, the representation is correct that the mobile homes / caravans on site were not included in the built footprint calculations referred to within Vol V of the GBCS, due to the structures not being present on the OS plans. However, they were in place on site when the initial site visit took place, when character was being assessed.
- 2.9 It is not clear from the representations if the mobile homes / caravans and their associated use are authorised through their historic siting – ie they have been in place on site and used for more than ten years, or whether a case might be made that the mobile homes / caravans, and their temporary occupation up to 28 days a year, are authorised through Schedule 2 Part 4 Class B of the GPDO relating to temporary uses of land. If the Council have any reason to dispute the authorised nature of the mobile homes / caravans, then they will be able to submit associated evidence. However, for the purposes of this assessment, it is assumed that the structures in question are authorised.
- 2.10 As a result, their retention, or replacement with similar mobile homes / caravans, would appear likely in order to continue to serve the requirements of the Camp. It would therefore seem reasonable to allow for the impact of such structures upon the appearance of the site, and the openness of it, when assessing the character of the site.
- 2.11 When re-assessing the development footprint of the site, the addition of the hatched areas at Appendix 2, representing the area covered by mobile homes and caravans, adds a further 5.9ha to the previously calculated development footprint of 8.4ha. However, this would assume all of the land within the hatched area is built upon. As is apparent on site, and from aerial photography, this is not the case, with the distribution of the structures occupying less than half of the hatched area. Whilst a precise figure has not been calculated, if a generous assumption of 50% development footprint is applied to the hatched area, it results in a total of 3ha being added to the 8.4ha of built footprint previously identified. This results in a development footprint of 11.4ha across the total site area of 37.4ha, or 30%.

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- 2.12 This figure of 30% is the lowest of all the Major Previously Developed Sites considered within Vol V of the GBCS and provides indication of the open character of the site. It is noted that the BTRE Vokes site did possess a lower coverage at the time of the initial assessment of the site, but it has since been redeveloped with a notably higher built coverage.
- 2.13 In accordance with Stage 1 of the assessment however, consideration should not be based simply on the development footprint percentage figure calculated. Site visits have been undertaken in order to understand the established character of the sites in question. Whilst recognising that there are a lot of caravans / mobile homes present on site, their limited scale means that they are not visually prominent structures when travelling through the site or within outlying areas of the Camp. There are still many parts of the site which exhibit a spacious parkland feel, including in the eastern half of the site when travelling along the main access route between the site entrance on Queens Road along the King's Way near the NRA offices to the north of the camp. The open character of the site is also influenced by the open boundaries and visual connection to the expansive shooting ranges on the north side of the site. Whilst such openness is not apparent across the entirety of the site, it is considered to be a significant enough presence to influence the overall character.
- 2.14 For the above reasons, Bisley Camp is considered to possess an open character which justifies its retention within the Green Belt. Further consideration against Stages 2 and 3 of Vol V (20) is therefore not necessary, and the initial recommendations of the GBCS with regards to the site remain valid.

3. Merrist Wood College

Summary of Representation

- 3.1 The representation submitted by Indigo, on behalf of the Guildford College Group, relating to Merrist Wood College, can be referred to at Appendix 3.
- 3.2 The submission suggests that if the criteria within the GBCS had been applied consistently, the College would be proposed to be inset and removed from the Green Belt. This was based upon Merrist Wood having the second highest proportion of built development on site, higher than 5 of those sites proposed to be inset, and is described in the submission as being *'packed tightly with development, implying minimal areas of open land'*. The submission refers to the site area of Merrist Wood being larger than most of the other sites proposed to be inset. Reference is also made to there being sufficient defensible boundaries in place to enable a clear demarcation of the site's developed areas on the landscape, plus the ability to strengthen boundaries if needed.

Re-Assessment

- 3.3 Merrist Wood differs from the other Major Previously Developed Sites considered in the GBCS due to it consisting of two distinct areas of development, connected by Coombe Lane as shown on Appendix 4. The two areas can be described as 'north' and 'south', with a 300m distance between them, made up of open fields and sports pitches.
- 3.4 If the two sites were to be assessed as one large area, then the contribution of the intervening open fields would inevitably result in the overall character being one of openness. The previous assessment in the GBCS combined the findings of the two distinct areas to give one recommendation for Merrist Wood College. As part of the re-assessment there is considered to be merit in considering the two areas individually, and undertaking a separate assessment for the north and south area as follows;

Southern Area

- 3.5 When assessed independently of the northern area, the percentage development footprint of the southern area increases beyond the combined finding, to 66% (3 ha development footprint across a 4.5ha site). If considered against this statistical analysis alone, then it is recognised that the site would appear to not exhibit an open character. However on visiting the southern area, it is apparent

that the site is open in character and exhibits a strong visual connection to the surrounding farmland within the Green Belt.

- 3.6 The southern area includes a large indoor riding arena and a number of single storey ancillary buildings which are considered to be agricultural in character, appearing consistent with the open character of the farmland. It is apparent that the built development footprint of the southern area is largely comprised of hardstandings and car parking as opposed to buildings. The proportion of hardstandings surrounding the indoor riding arena has influenced the percentage development footprint within the southern area although it does generally exhibit an open character on visiting the site.
- 3.7 Overall, there is an agricultural appearance and character to the southern site. From most locations within it, views of the undeveloped area of countryside beyond the site boundaries are apparent. It reflects a rural environment that is likely to be similar to that experienced at a number of larger farmyards, past or present, consisting of a cluster of barns and buildings, found across the Borough and the wider Green Belt.
- 3.8 On balance, it is considered that the southern area does possess an open character, that connects with the openness of the wider Green Belt. As a result, it is not necessary to undertake Stages 2 and 3 of the GBCS Vol V (20), and the recommendation with regards to its future designation remains as set out within GBCS Vol V.

Northern Area

- 3.9 When assessed separately from the southern area, the northern area records a development footprint of 41%, or 3.4ha across an 8.2ha site. This is comparable with some of those sites that have been proposed for removal from the Green Belt, but less than some which have been proposed for retention in the Green Belt (RHS Wisley).
- 3.10 The northern area is generally characterised by a sparse distribution of education and accommodation buildings within a campus arrangement separated by open spaces. There are a number of horticultural polytunnels and glasshouses located to the north of the site. There are notable open spaces that separate such clusters of buildings, that exhibit a strong visual connection to the outlying farmland and the wider Green Belt.

-
- 3.11 When within the northern area, such undeveloped spaces do, in a number of instances, allow views through to the wider Green Belt beyond. When approaching the site from the south, views of the buildings within it, and the undeveloped spaces between buildings, are readily apparent from Coombe Lane. There is a clear connectivity with the adjoining landscape, and whilst it is noted that additional trees have been planted recently along the southern edge, and reference is made in the Indigo submission to potential further boundary landscaping in the future, the assessment should be made on the existing character and how openness contributes towards this.
- 3.12 On balance, it is considered that the northern area does exhibit sufficient open characteristics to warrant its retention within the Green Belt.

4. ADDITIONAL COMMENTS

- 4.1 Both of the representations submitted refer to concerns about the potential redevelopment of the sites in question if they are not removed from the Green Belt. It is considered relevant to note that their retention within the Green Belt does not imply future development proposals will be unachievable.
- 4.2 One of the notable changes in Green Belt policy that was introduced with the NPPF in 2012, was reference to the potential infilling or redevelopment of previously developed sites in the Green Belt, at paragraph 89. Prior to this, PPG 2 (Green Belts) referred to major developed sites in the Green Belt potentially being subject to different policies within Local Plans. This is why Policy RE15 of the Council's 2003 Local Plan refers to such matters and identifies sites accordingly. The need for a policy such as RE15, focussing on major sites, no longer exists, due to guidance in the NPPF now relating to the potential redevelopment and infilling of previously developed sites, of any scale.
- 4.3 It is acknowledged that paragraph 89 does require such redevelopment not to have a greater impact on the openness of the Green Belt, and this will be a matter for assessment at application stage.
- 4.4 It should also be noted that a case might be made for development that does have a greater impact on the openness of the Green Belt, if very special circumstances can be demonstrated, as explained at paragraphs 87 and 88 of the NPPF. The success or otherwise of such a case would be dependent upon the merits of specific proposals, and their associated impact.

Appendix 1

Bisley Camp Representation



Our Ref: A098834

Planning Policy Team

Guildford Borough Council
Millmead House
Millmead
Surrey
GU2 4BB

15 July 2016

BY EMAIL ONLY: localplan@guildford.gov.uk

Dear Planning Policy Team

RE: WRITTEN REPRESENTATIONS IN RESPONSE TO THE COUNCIL'S PROPOSED SUBMISSION LOCAL PLAN (REGULATION 19) CONSULTATION ON BEHALF OF THE NATIONAL RIFLE ASSOCIATION.

This letter and the accompanying completed consultation questionnaire and comments form comprises the formal written submissions made on behalf of our client, The National Rifle Association (NRA), in response to the content of the Council's Proposed Submission Local Plan: strategy and sites (herein referred to as LP1).

Before responding further on LP1 however, we would take this opportunity to once again provide the Council with some general background about our client, the NRA and the Bisley Camp itself. We trust this will provide helpful context to the comments made in this response.

General Background

As set out in the NRA's response to the Draft Local Plan (the DLP) in September 2014, Bisley Camp comprises an overall area of 79ha. The Camp is the internationally recognised home of world target shooting, owned and operated by the NRA. The NRA is a registered charity with a Royal Charter and serves 30,000 target shooting members and affiliates in the UK. The facilities on Bisley Camp serves the largest range complex in Europe that includes 11 rifle ranges providing targets at distances of up to 1,200 yards, and the UK's finest and largest clay pigeon shooting complex. Camp facilities include retail premises; visitor and staff accommodation; club houses and catering outlets; storage, service, production and office buildings; museum and armouries.

Bisley Camp hosts a year-round programme of competitions and events that each attract up to 2,500 competitors including many from overseas. The Camp is also the home of the other two major UK target shooting organisations, the Clay Pigeon Shooting Association and National Small Bore Shooting Association; and the ranges are extensively used for training by the armed forces, the police and other organisations.

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Shooting is a major sport in the UK with over 600,000 regular participants contributing £2 billion to the UK economy (GVA); Bisley Camp is by far the largest target shooting complex in Europe and has the highest profile and richest history in the eyes of the international shooting community - most shooters have heard of "Bisley", many aspire to visit Bisley, and tens of thousands shoot at Bisley every year.

Comments on particular sections of LP1

Section 2: Key Facts about the Borough

The NRA have no concern with the current content of paragraphs 2.1 – 2.35 *per se*. However, aside from the single reference made within paragraph 2.8 that '*The tourism and service sectors, commercial services and manufacturing industries are also significant employers in the borough*' there is no recognition of the Borough's leisure and visitor experience and the significant contribution this makes. Indeed, it is not until Section 4 of LP1 that the leisure and visitor experience is given substantive reference wherein paragraph 4.4.53 sets out the leisure and visitor experience is one of the fastest growing industries in the Borough which makes a significant contribution to Guildford's economy. Indeed tourism alone is referred to generating over £330 million of income for local businesses and supporting more than 6,000 jobs (in 2014).

The NRA, being a provider and contributor to the Borough's leisure and visitor experience would encourage greater recognition of the overall leisure and tourism industry within LP1 and for this to be rightly presented within Section 2 of the Plan and its establishment of key facts about the Borough.

Section 4: Policies

Policy S1: Presumption in Favour of Sustainable Development

The NRA support the presumption in favour of sustainable development and the commitment to work proactively with applicants to jointly find solutions that mean that proposals can be approved wherever possible; and to secure development that improves the economic, social and environmental conditions in the area. This approach being compliant with the National Planning Policy Framework (NPPF).

Section 4.3: Protecting Policies; Policy P2: Green Belt

The NRA note paragraph 4.3.11 reflects the NPPF in stating that the main aim of Green Belt is to prevent urban sprawl by keeping land permanently open.

Paragraph 4.3.12 states that historically all the villages in the Borough, except Ash Green, and major previously developed sites have been washed over by the Green Belt designation. The text then correctly confirms that the NPPF states that only those villages whose open character makes an important contribution to the openness of the Green Belt should be included within it. Those that do not should be inset, or removed, from it and other development management policies used to restrict any inappropriate development.

Paragraph 4.3.13 provides a list of villages which under LP1 will now be inset from the Green Belt.

Paragraph 4.3.14 follows and clearly states that although not villages, a similar approach is to be applied to major previously developed sites in relation to whether they should remain washed over or be inset from the Green Belt. Again the paragraph correctly reiterates that the NPPF 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.

Paragraph 4.3.15 goes on to list the major previously developed sites (MPDS) which will become inset from the Green Belt under LP1. These are: Henley Business Park, HM Prison Send, Keogh Barracks, Mount Browne, Pirbright Barracks, Pirbright Institute and the University of Law Guildford.



The NRA do not object to the inseting of any of these MPDS from the Green Belt. However, the NRA are entirely concerned, and disappointed, by: 1) the omission of Bisley Camp from the list of major previously developed sites within the Borough set out by paragraph 4.3.15; and 2) the according omission of Bisley Camps developed land area as being inset from the Green Belt and shown to be so on the proposals maps of LP1.

As the Council will recall, in response to the consultation on the DLP in late 2014 the NRA submitted representations on the findings of the Council's Green Belt and Countryside Study (GBCS) which comprised, and still does, part of the evidence base upon which the new local plan and its policies are being developed. It is not our intention to fully reiterate the content of the representations made in response to the DLP in response to LP1. A copy of the complete submission is however included at **Appendix 1** of this submission for ease of reference and we invite the Council to review it again as a comprehensive element of the NRA's submission to LP1, specifically in regard to the content under the section heading 'Assessment of the Evidence Base'.

As currently written, whether by intention or otherwise, the NRA are concerned that between the consultation on the DLP the potential, and correct, status of the developed area of Bisley Camp as a MPDS has now been withdrawn by LP1. This is sincerely disappointing given the comparable similarities identified for the Council within the NRA's representations made in response to the DLP, specifically regarding the developed area of Bisley Camp and Henley Business Park and The University of Law. The NRA consider that the status of these sites as MPDS support the basis for recognising and establishing Bisley Camp as a MPDS within LP1; and equally for Bisley Camp to be removed from the Green Belt also.

Accordingly, the NRA would like to see paragraph 4.3.15 amended to include Bisley Camp as a specified major previously developed site. The NRA also consider that the boundary of Bisley Camp's MPDS should be drawn on the LP1 proposal maps to the extent shown on the drawing attached as **Appendix 2** of this letter.

The NRA also note that beyond the reference to MPDS within paragraph 4.3.15 LP1 does not contain any other policy concerning MPDS. Having spoken with members of the Council's Policy Team we have been advised that, at this time, it is the intention that a specific policy or set of policies relating to MPDS's will be brought forward as part of the future Local Plan 2: Development Management Policies (LP2). It is considered this approach is less than ideal for the NRA and Bisley Camp. Firstly, although a MPDS policy could conceivably be delivered via the LP2 given the purpose and intent of MPDS status and its implications it is considered that this matter should be addressed as part of the LP1. MPDS are strategic policy designations and their designation and policy context should be developed and assessed accordingly. Indeed, as currently written in LP1 it would appear that this is what the consequence of paragraph 4.3.15 and the proposals maps are already establishing. The omission of Bisley Camp as an inset MPDS within LP1 is therefore failing to support the future regeneration and potential sustainable growth of the camp as a significant contributor to the leisure and tourism industry within the Borough. This would be contrary to paragraph 28 of the NPPF and likewise to the Council's own stated spatial vision.

The NRA would also acknowledge the Council's current LDS sets out the timescale for delivery of LP2 which is due to commence with evidence gathering from September 2017. Final adoption of LP2 will subsequently follow, after intervening consultation stages, in late 2018/early 2019. LP2 is clearly some way from the present and this further increases the importance to the NRA of the appropriateness to define the status of Bisley Camp as a MPDS (whether within or inset from the Green Belt) as part of LP1.

In summary conclusion, the NRA consider Bisley Camp should be allocated as an *inset major previously developed site*. Insetting the site would not conflict with the purposes of including land within the Green Belt (as defined by Paragraph 80 of the NPPF) and, on balance, there is no reason why sufficient defensible boundaries (in compliance with Paragraph 85 of the NPPF) should not be identified. In this



regard the NRA would welcome further dialogue with Officers of the Policy Team to discuss and provide additional boundary information. Furthermore, as identified in paragraph 20.8 of the GBCS, if major previously developed sites are not considered appropriate for inseting and are to remain washed over within the Green Belt this implies the open character of the site makes an important contribution to openness. This in turn implies there is limited opportunity to redevelop, or expand the site, without detracting from the openness of the Green Belt. It is evident from an objective assessment of the major developed area at Bisley Camp that the land does not make such an important contribution to the openness of the Green Belt nor does it in landscape character terms as identified in the Council's own Landscape Character Appraisals. It is also evident that Bisley Camp exhibits comparable features with other major previously developed sites in the Borough that are proposed to be inset from the Green Belt and are stated as such within paragraph 4.3.15 of LP1.

Policy P2: Green Belt

The NRA generally support the wording of Policy P2.

However, the 4th bullet point of paragraph 89 of the NPPF clearly states the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces is one of the stated exceptions whereby the construction of a new building need not be considered inappropriate. Nowhere within the NPPF is it stated or implied that new buildings must also be sited on or close to the position of the existing building.

The inclusion of this requirement within Policy P2 is therefore entirely unnecessary, unduly restrictive and fails to accord with the corresponding Green Belt policies of the NPPF. The inclusion of this requirement within Policy P2 is also unqualified within the supporting text to justify why such a specific additional policy requirement should be included within the Borough's development plan.

The NRA would therefore support an amendment to Policy P2 so that it reads:

'...Proposals will be permitted where they are consistent with the exceptions listed in national planning policy and, where relevant, also meet the following criteria:...

Replacement buildings

The replacement of a building, provided the new building:

- Would be in the same use, and*
- Is not materially larger than the one it replaces, and*
- ~~Is sited on or close to the position of the existing building.~~*

Section 4.4: Economy Policies: Policy E5

The NRA endorse the inclusion within the first bullet point of Policy E5 the clear statement that to promote a strong rural economy the sustainable growth and expansion of all types of business and enterprise in rural areas will be supported through conversion of existing buildings and provision of well-designed new buildings of appropriate scale, provided they are in accordance with green belt policies and other policies in the plan.

Section 4.4: Economy Policies: Policy E6: The leisure and visitor experience

The NRA are pleased to see paragraphs 4.4.53 – 4.4.56 provide a summary of the role and contribution that the leisure and visitor experience provides to the quality of life, social and cultural wellbeing of the Borough. The sectors contribution and value to the Borough's economy is also rightly noted within the text.

The NRA would be pleased if within paragraph 4.4.55 the Council wished to refer to the Bisley Camp and the NRA as another of the Borough's named recreational and tourism attractions and leisure opportunity.



The NRA consider the wording of Policy E6 is correctly supportive for the Borough's future leisure and visitor experience and is pleased to see the provision of new and enhanced leisure and visitor attractions and the provision of new and improved accommodation and conference facilities for tourist and business visitors.

Conclusions

The NRA are disappointed by the failure to identify and include the developed area at Bisley Camp as a major previously developed site and thereafter for the developed area to be removed from the Green Belt. Whilst in the earlier DLP Bisley Camp was proposed to remain within the Green Belt it had correctly been identified as a major previously developed site. The NRA therefore consider that LP1 no longer provides the same recognition and support for Bisley Camp and this in turn is to the detriment of the NRA's own interests and that of the Borough's.

The NRA are also concerned by the omission within LP1 of the former site specific policy allocation (Policy 83) that was proposed as part of the DLP. This appears to be to the further detriment of the NRA's existing and future reasonable aspirations to preserve and enhance the facilities on offer. Within the emerging new local plan the NRA consider there remains the need to specifically support the NRA and Bisley Camp as a whole as a significant local employer, tourist, leisure and recreational provider and a nationally (and internationally) recognised facility.

The NRA acknowledge that Bisley Camp must continue to be correctly governed by appropriate national and local plan policies. However, it is considered the apparent failure to acknowledge the developed area of Bisley Camp as a major developed site and the subsequent retention of the site within the Green Belt will result in unnecessary policy restraints in addition to other development management policies that can sufficiently be used to restrict any inappropriate development from taking place, i.e. heritage and conservation protection, biodiversity and ecology protection policies, etc.

On behalf of the NRA we therefore respectfully request the comments made in this written submission be fully taken into account and appropriate supportive amendments be made before the Submission of the new local plan is undertaken.

We would like to discuss this submission with Officers of the Policy Team at the earliest opportunity. Please contact myself on tel. 01483 579098.

Yours faithfully

Andy Stallan
Director

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Your ref:

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Dear Sir/Madam

RE: Written Representations on Guildford Borough Council's Draft Local Plan: Strategy and Sites, on Behalf of The National Rifle Association.

Bisley Camp, Bisley, Brookwood

This letter comprises a formal written submission, prepared on behalf of our client, The National Rifle Association (NRA), in relation to the Guildford Draft Local Plan: Strategy and Sites (herein referred as the 'DLP').

The representation firstly seeks to support the allocation of Bisley Camp, contained in Policies D9 and Policy 83 of the DLP, as a 'major previously developed site' (MPDS). Secondly, it seeks to demonstrate the identified MPDS should be inset from the Green Belt and not remain washed over as currently proposed by the DLP.

Policy 1: Presumption in favour of Sustainable Development

The NRA support the presumption in favour of sustainable development and the Council's commitment to work proactively with applicants to jointly find solutions that mean proposals can be delivered wherever possible. This approach being compliant with the National Planning Policy Framework (NPPF).

'Policy 9: Villages and major previously developed sites'

The NRA generally support Policy D9 as written in the DLP. As the Council will already be aware, Paragraph 28 of the NPPF requires that planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. Paragraph 28 also states that plans should:

- *"support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well-designed new buildings;*
- *"support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This*

should include supporting the provision and expansion of tourist facilities in appropriate locations...”

In recognising Bisley Camp as a major previously developed site within the Green Belt draft Policy 9 reflects the objectives of paragraph 28 of the NPPF.

The NRA do however consider the Major Previously Developed Site boundary, as shown by the Bisley Camp plan in the DLP, excludes land which should be within the developed area boundary. The land in question is that extending to the west of the main vehicular access into the site from Queens Road. For ease of reference the land is shown washed over in blue on the drawing enclosed as Appendix 1 to this letter. This land was correctly included within the previously developed land parcel identified by the Council’s Green Belt and Countryside Study (Volume 5, April 2005).

In addition, the NRA also consider the Council has missed the opportunity to appropriately identify the major developed area of Bisley Camp for inseting within the Green Belt.

Assessment of the Evidence Base

In general we support the methodology and approach employed in the Council’s Green Belt and Countryside Study (Volumes 1 – 5) (GBCS). This document comprising one of the most salient elements of the evidence base utilised in the identification and assessment of all the Borough’s major previously developed sites.

The GBCS utilised a three staged assessment approach. Stage 1 comprising consideration of whether a site possesses open character and remaining within the Green Belt would promote a resistance for notable future redevelopment or expansion. Stage 2 comprising an assessment of the environmental, statutory and physical constraints which preclude or restrict potential redevelopment or expansion. Stage 3 then assessing whether the previously developed site has defensible boundaries and its ability to accord with Green Belt purposes 2 and 4- as set out by Paragraph 80 of the NPPF, i.e. preventing neighbouring towns from merging and preserving the setting and special character of historic towns respectively.

The conclusion of the assessment for Bisley Camp identified:

- a low proportion of built development footprint (20%) to openness (80) (comprising 8.4Ha of built development of the overall 37.4Ha area considered),
- there are large areas of open land located between the historic barracks, pavilions, offices, visitor centres and rifle shooting ranges, and
- due to the sparse arrangement of the built form the Camp has an open character and lacks defensible boundaries (in planning terms).

Given this assessment the GBCS concluded that, on balance, it would not be appropriate to inset Bisley Camp within the Green Belt.

Having reviewed the consideration given in the GBCS, we consider the assessment has undervalued and miss-assessed the character and features of the developed area of the Camp; its contribution to the wider Green Belt and its openness; and the general presence of defensible boundaries.

Firstly, it is apparent from the 'Stage 1 Bisley Camp Development Footprint' drawing (included within Volume 5 of the GBCS and enclosed as Appendix 2 of this letter for ease) that a considerable extent of land has been excluded from the identified development footprint; which we consider should not have been. The land in question comprises numerous areas of land situated in the eastern, central and northern part of the developed area. The drawing enclosed as Appendix 1 to this letter identifies these land parcels. All of these sub-parcels are physically occupied throughout the year by mobile homes and caravans. Although it is noted mobile homes and caravans do not themselves comprise development (as defined by the Town and Country Planning Act 1990 (as amended)) the consequence of their physical presence is such that in Green Belt terms the land cannot be considered to be visually open and undeveloped. Moreover, the mobile homes and caravans on the land, in accordance with the Caravan License for the site, number up to maximum 437 units. These mobile homes and caravans and the land they occupy in totality therefore comprise one of the dominant land uses within the Camp's previously developed site area. We believe they should be accounted for within the developed footprint and in so doing this would result in a significant uplift of the 20% development footprint identified by the GBCS. The uplift likely to be somewhere in the region of a further 15 – 20%. The overall ration should therefore be acknowledged as being closer to 35% – 40%.

Secondly, within the GBCS the visually open character of the Camp has been concluded to contribute to the openness of the wider Green Belt. When reviewing the Guildford Landscape Character Assessment and Guide (2007), wherein Bisley Camp is located in Land Parcel F1: Pirbright Common Unsettled Sandy Heath, the key landscape characteristics are defined as being level and gently undulating topography with a densely vegetated, enclosed and remote landscape. It is further noted that views between woodland blocks into the more open interior or firing ranges are occasional.

Specific to the developed area of Bisley Camp, we would suggest that wider views are limited. To the immediate south and west there is considerable woodland enclosing the boundary of the developed area. To the north, although the landscape is dominated by open heathland the distant views of the developed area from beyond the long distance range (the longest range at the Camp) combined with the natural undulation of the land and presence of intervening mature and natural woodland screening limits views of the developed area. To the east views of the site are also entirely limited due to the presence of Woodlands. The developed area of the site is therefore largely contained within its own setting; limiting the contribution it makes to the wider openness and character of the Green Belt. The surrounding landscape is also most unlikely to significantly change given the areas of woodland and heathland comprise designated Special Protection Areas (SPA), Sites of Special Scientific Interest (SSSI), Special Areas of Conservation (SAC) and Sites of Nature Conservation Importance (SNCI). It is not therefore necessary to keep the land permanently open.

Thirdly, when considering the GBCS assessment for other sites proposed by the DLP to be inset we are concerned the assessment has not been consistently applied. Examples of this include the proposed inseting of the University of Law Campus and Henley Business Park (former BTRE Vokes).

In regard to the University of Law, the GBCS assesses the built development to openness ratio of 40:60 and there are several environmental constraints affecting the site. These include the Braboeuf Manor (St Catherine's) Conservation Area, the site being within the Surrey Hills AONB, a number of environmental constraints and the proximity of Ancient Woodland. Notwithstanding however, given the site is considered to be largely enclosed by woodland and has defensible boundaries it is proposed

to be inset. In comparison to Bisley Camp this conclusion is notable. Firstly, the built developed land area is comparable to Bisley Camp (including the additional land identified in this representation); secondly, the eastern boundary of the designation appears from satellite images to run along a line within open fields. This approach seemingly in conflict with the apparent conclusions on the defensible boundaries of Bisley Camp. Fourthly, the site is within a conservation area wherein this presents the same potential policy constraint as the presence of the conservation area at Bisley Camp. Fourthly, as referred in the GBCS, the University of Law site is within Landscape Character area F8 wherein there is high sensitivity in Green Belt purpose terms. As the site is considered to be well enclosed by surrounding woodland however, the conclusion has been reached that the site doesn't contribute to the openness of the wider Green Belt.

With regard to Henley Business Park, the built development to openness footprint has been identified to comprise only 13%. This is notably below the 20% identified by the GBCS and significantly lower than the ratio indicated by this representation. It is also considered to exhibit large areas of open land located between isolated commercial buildings, car parks and open fields with the presence of defensible boundaries often incomplete. We would agree with these conclusions. Within draft Policy 9 however, the site is allocated to be inset within the Green Belt. Whilst the NRA do not object to its proposed inset it would seem the site is comparatively less favourable than the merits for Bisley Camp being inset. It is noted Henley Business Park is a retail and business land use wherein its retention in the Green Belt could present a notable restriction for future expansion. Notwithstanding, this value is not considered to be of such weight wherein it should prevail over the conclusions of the site's less favourable Green Belt merits/consequence. Its proposed removal from the Green Belt therefore clearly raises questions as to why Bisley Camp's developed area should not likewise be inset.

To summarise, the NRA support the identification of the developed area at Bisley Camp for allocation as a major previously developed site within the Green Belt. It is however considered the site should be allocated as an *inset major previously developed site* for the reasons set out above. In-setting the site would not conflict with the purposes of including land within the Green Belt (as defined by Paragraph 80 of the NPPF) and, on balance, there is no reason why sufficient defensible boundaries (in compliance with Paragraph 85 of the NPPF) should not be identified. In this regard the NRA would be happy to have dialogue with Officers subsequent to the current consultation deadline of the 22nd September and thereafter provide additional boundary information. Furthermore, as identified in paragraph 20.8 of the GBCS, if major previously developed sites are not considered appropriate for inset and are to remain washed over within the Green Belt this implies the open character of the site makes an important contribution to openness. This in turn implies there is limited opportunity to redevelop, or expand the site, without detracting from the openness of the Green Belt. It is evident from an objective assessment of the major developed area at Bisley Camp that the land does not make such an important contribution to the openness of the Green Belt. It is also evident that Bisley Camp exhibits comparable features with other major previously developed sites in the Borough that are proposed to be inset from the Green Belt.

Policy 83: Bisley Camp, Bisley, Brookwood

By way of general background, Bisley Camp comprises an overall area of 79ha. The Camp is the internationally recognised home of world target shooting, owned and operated by the National Rifle Association (INRA). The NRA is a registered charity with a Royal Charter and serves 30,000 target

shooting members and affiliates in the UK. The facilities on Bisley Camp serves the largest range complex in Europe that includes 11 rifle ranges providing targets at distances of up to 1,200 yards, and the UK’s finest and largest clay pigeon shooting complex. Camp facilities include retail premises; visitor and staff accommodation; club houses and catering outlets; storage, service, production and office buildings; museum and armouries.

Bisley Camp hosts a year-round programme of competitions and events that each attract up to 2,500 competitors including many from overseas. The Camp is also the home of the other two major UK target shooting organisations, the Clay Pigeon Shooting Association and National Small Bore Shooting Association; and the ranges are extensively used for training by the armed forces, the police and other organisations.

Shooting is a major sport in the UK with over 600,000 regular participants contributing £2 billion to the UK economy (GVA); Bisley Camp is by far the largest target shooting complex in Europe and has the highest profile and richest history in the eyes of the international shooting community - most shooters have heard of “Bisley”, many aspire to visit Bisley, and tens of thousands shoot at Bisley every year.

As presently written Policy 83 recognises the existing land use as ‘*Sport and recreation, business premises, workshops, retail, hotel (sui generis)*’ and the proposed allocation is worded identically. The NRA generally embrace this overarching recognition and the proposed allocation.

It is however considered Policy 83 should be expanded to recognise the mobile home and caravans use of the land – this being a fundamental and integral part of the lands use. The identified ‘Existing Use’ and ‘Allocation’ text in Policy 83 should therefore read:

Existing Use	Sport and recreation, business premises, workshops, retail, hotel and mobile home and caravan sites (sui generis).
Allocation	Sport and recreation, business premises, workshops, retail, hotel and mobile home and caravan sites (sui generis).

The ‘Opportunities/commentary’ section should also be amended to acknowledge the inseting of the major previously developed area of the site. It should also correctly note the need for future proposed development not to have a greater impact upon the Green Belt than the existing, and must not adversely impact upon the site’s other statutory and local plan policy constraints, e.g. the SPA, the conservation area, the SAC, Tree Preservation Orders, etc.

Conclusions

The NRA support the identification and inclusion of the developed area at Bisley Camp as a major previously developed. It is however considered the DLP should be amended to: firstly acknowledge and include all of the previously developed land at Bisley Camp within the MPDS; and secondly, the amended developed area of the site should be inset from the Green Belt. These changes being achievable without generating conflict with the advice of the NPPF and the guidance of the NPPG. It is also considered there is a greater need to support the NRA and Bisley Camp as a whole as a significant local employer, tourist, leisure and recreational provider and nationally recognised facility.

Whilst fully appreciated the planning context of the site it needs support and more flexibility in the way planning policies are devised.

On behalf of the NRA we therefore respectfully request all the comments raised in this written representation be fully taken into account in the next stages of the Local Plan.

If you would like to discuss any aspects of this submission further or require further information, please do not hesitate to contact either myself, or my colleague, Stuart Crickett by email (addresses contained on page 1 of this letter) or tel. 01483 579 098.

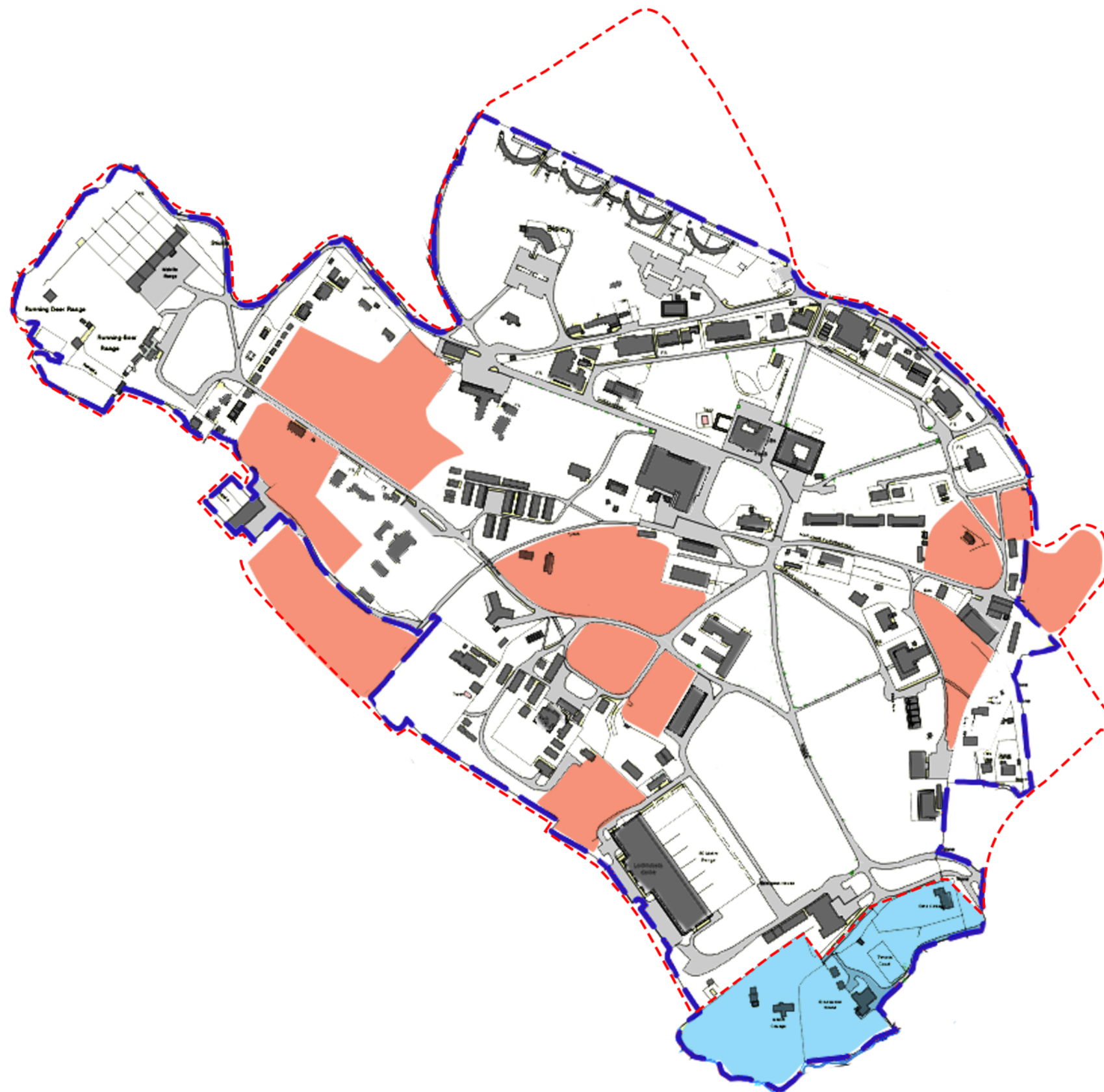
Yours faithfully

A handwritten signature in black ink, appearing to read 'Andy Stallan', with a stylized flourish underneath.

Andy Stallan
Director
Encs.

Appendix 1

Appendix 2



- KEY**
- - - MAJOR PREVIOUSLY DEVELOPED SITE LOCAL PLAN BOUNDARY (2014)
 - - - GREEN BELT AND COUNTRYSIDE STUDY PREVIOUSLY DEVELOPED SITE BOUNDARY (VOL. 5, 2014)
 - MOBILE HOME/CARAVAN SITES
 - EXCLUDED AREA

NOTES

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Serial reference number :

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Rev	Date	Comments
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CLIENT

THE NATIONAL RIFLE ASSOCIATION

PROJECT

STAGE 2 LOCAL PLAN REPRESENTATIONS

TITLE

BISLEY CAMP LOCAL PLAN REPRESENTATIONS

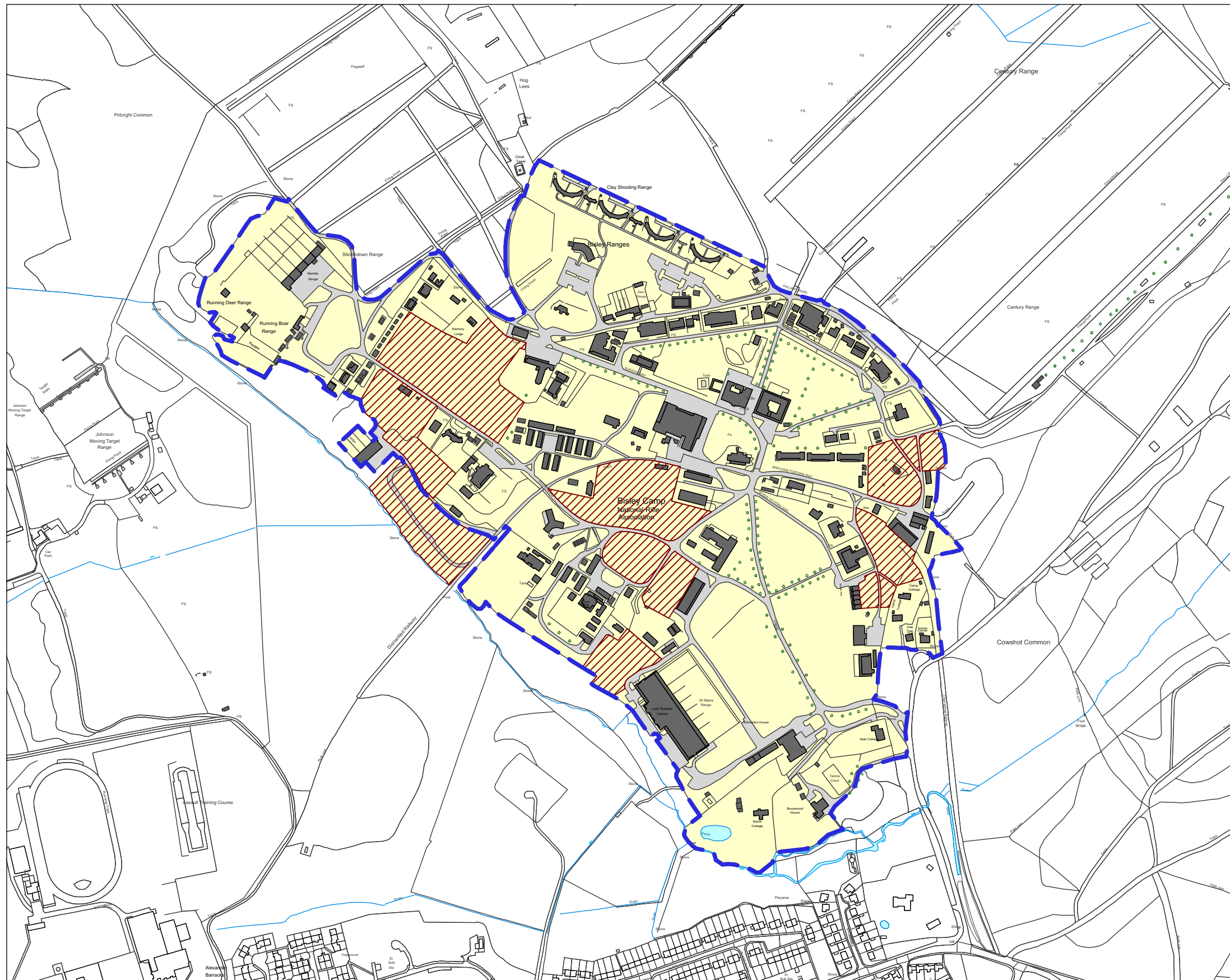
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DRAWN BY: AT	CHECKED BY: SC	APPROVED BY: ACS

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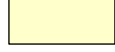


Appendix 2

Bisley Camp Development Footprint Plan



KEY

-  Previously Developed Site - 37.4ha
-  Development Footprint (overall) - 14.32ha including buildings, highways, railways and static caravans/mobile homes
-  Areas of Static Caravans - 5.92ha
-  Open Space - 23.08ha including parkland, informal green space churchyards and gardens

Revisions:
First Issue- 14/12/2016 AD

Appendix 2

Bisley Camp

Guildford Green Belt Vol V Addendum

Client: Guildford Borough Council

DRWG No: **BNL.0287_38** Sheet No: **2/9** REV: **_**

Drawn by : AD

Approved by: RF

Date: 14/12/2016

Scale: 1:5,000 @ A3

Pegasus
Environment



Appendix 3

Merrist Wood Representation

Merrist Wood College, Worplesdon, Guildford

Representations to draft Proposed Submission Local Plan
(Regulation 19)

July 2016

22680001

Merrist Wood College, Worplesdon, Guildford

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Merrist Wood College, Worplesdon, Guildford

1. Introduction	4
2. Policy Background	6
3. Draft Policy 2 The case for inseting Merrist Wood from the Green Belt	10
4. Development aspirations	14
5. Proposed amendments to policy wording	15

1. Introduction

- 1.1. We act on behalf of the Guildford College Group in relation to their Merrist Wood College campus. Merrist Wood is a land-based college, which trains skilled workers for agricultural and horticultural industries.
- 1.2. The Merrist Wood campus is a long established college and the only land based college in Surrey. It extends over 400 acres, with a wide range of built facilities covering over 12.7ha including teaching blocks, student accommodation, glasshouses, workshops, sports pavilions, and one of the largest indoor equine arenas in the south east. The College is broadly split between the northern and southern campuses.
- 1.3. Merrist Wood College (MWC) is a 162ha, multi-award winning College which specialises in the land-based industries. The College is widely recognised by industry specialists for its training and for its past successes at RHS Chelsea and more recently at the Hampton Court Flower Shows; with work from the estate known across the country and in other parts of the world. The College has a national and international reputation amongst employers and industry specialists and a long history of providing education in the land-based sectors. In the College's last Ofsted inspection they were graded as having "outstanding provision in land-based, equine and animal care". Inspectors commented that there is "very good academic and pastoral support" and "curriculum enrichment, including work experience, visits and external speakers, is strong".
- 1.4. The existing educational facilities at MWC include a large, diverse animal management centre which has both domestic and exotic animals; specially designed studios and workshops for floristry (horticulture), garden design and landscaping (with ancillary retail); workshops and classrooms for maintenance of agricultural machinery and equipment (vehicle technology); equine care and livery (currently with accommodation for over 70 horses); an indoor riding arena which is one of the largest of any college in the country; student classrooms, computer technology suites, a student library and associated ancillary student facilities including a restaurant, etc.; a working farm; and, on-site student and staff residential accommodation. The College also provide outdoor sport activities for its students and the wider community, which includes an existing affiliation with Chelsea Football Club wherein one of their 'soccer academies' is run from the land at MWC.

1. Introduction

- 1.5. The College are developing ambitious plans for the future. Having recently invested £1m at their Farnham Sixth Form College site in the last three years they are now looking to further heavily invest in the redevelopment and enhancement of the Merrist Wood Campus in the coming years.
- 1.6. There is a continuing need to rationalise, modernise and grow the college campus to cater for an expanding educational offer and the anticipated growth. The College has suffered from under-investment for a number of years. With a renewed emphasis on modernising the educational offer at Merrist, the College are currently exploring development plans with the council through the pre-application process to expand and modernise the campus. These current development plans will ensure that the college is allowed to maintain and improve its facilities and realise capital funds, to secure its long term future. This evolution and growth of the campus will continue into the future.
- 1.7. It is therefore important that the emerging Guildford Borough Local Plan allows for the continual evolution and current growth plans for Merrist Wood. Our contention is that the Merrist Wood campus should be inset from the Green Belt as has been proposed for other major developed sites in the Green Belt. The Merrist Wood campus is larger, with more built development than many of the other major developed sites that have been proposed to be inset from the Green Belt. The campus is well contained in the landscape with opportunities on its own land to strengthen defensible boundaries.

2. Policy Background

- 2.1. The status of Merrist Wood as a major developed site in the Green Belt has been recognised in successive versions of the Local Plan.
- 2.2. More recently, draft Policy 9 'Villages and major previously developed sites' of the Draft Local Plan (Regulation 18 – July 2014) gave recognition to previously developed sites in the Metropolitan Green Belt. It stated that development should help support the present and future economic, environmental and social sustainability of rural settlements in the Borough.
- 2.3. Two levels of major previously developed sites were referenced. Firstly, sites including Mount Browne Headquarters and the Pirbright Institute where "appropriate development and redevelopment opportunities will be supported". Secondly, other major previously developed sites, including Merrist Wood College, Bisley Camp and RHS Wisley were identified as suitable for "small scale or infill development and redevelopment".
- 2.4. The provisions of Draft Local Plan Policy 9 have, however, not been carried through to the Submission version of the Local Plan (July 2016). Instead, there is a new draft Policy 2. Draft Policy 2 gives no recognition to previously developed sites in the green belt such as the Merrist Wood campus, and fails to support the present and future sustainability of rural settlements.
- 2.5. Although not explained as the reason for removing draft Local Policy 9, we understand that as the NPPF now gives greater support for the limited infilling or the partial or complete redevelopment of previously developed sites, there is perhaps no need to recognise major previously developed sites in the Green Belt in the Local Plan to allow for their expansion.
- 2.6. Supporting text to draft Policy 2 states that "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". Seemingly using these criteria, the Submission Local Plan proposes to remove some major developed sites from the Green Belt, including Henley Business Park, HM Prison Send, Keogh Barracks, Mount Browne, Pirbright Barracks, Pirbright Institute and the University of Law Guildford. Further, it is proposed that these

2. Policy Background

sites are then allocated for development, including housing, or designated as Strategic Employment Sites.

- 2.7. Supporting text states that the Council considers that “exceptional circumstances exist to justify the amendment of Green Belt boundaries in order to facilitate the development that is needed and promote sustainable patterns of development” (para. 4.3.16).
- 2.8. We have reviewed the Guildford Borough Green Belt and Countryside Study, prepared on behalf of the Council by Pegasus Group, to understand the evidence base upon which the Council is relying for green belt matters. This study reviewed all of the previously developed sites within the green belt, to determine whether there are opportunities for appropriate expansion or redevelopment of those sites. Sites were determined to either be inappropriate or appropriate for inseting within the green belt as follows:

Major previously developed sites considered inappropriate for inseting and to remain ‘washed over’ by the Green Belt	Major previously developed sites considered appropriate for inseting within the Green Belt
Bisley Camp BTRE Vokes, Normandy Merrist Wood College RHS Wisley	Mount Browne Police Headquarters HM Prison, Send The University of Law, Guildford Peasmarch Industrial Estate Pirbright Barracks Keogh Barracks Pirbright Institute

Source: Guildford Borough Green Belt and Countryside Study, Volume 5, para. 24.32

2. Policy Background

2.9. It appears that four broad criteria were used to make the allocations in the above table. These were the proportion of built development/openness; the total site area; land uses and character; and the presence or otherwise of defensible boundaries. Pegasus Group’s findings can be summarised as follows:

Site	% built development	Total site area	Uses and character	Defensible boundaries	
1	Mount Browne Police HQ	42% (2.1ha)	5.1ha	Offices, car parking areas, and areas of open land which provide a limited contribution to the openness of the wider green belt	Visually enclosed by woodland and tree belt
2	HM Prison, Send	33.3% (2.9ha)	8.7ha	Prison buildings, parade grounds, open land which does not contribute to openness of the wider green belt.	Visually enclosed by woodlands and hedgerows
3	The University of Law, Guildford	40% (1.4ha)	3.5ha	Limited areas of open land, college buildings and car parking areas. Urban in character.	Generally visually enclosed by woodland, evidence of defensible boundaries
4	Peasmarch Industrial Estate	59% (4.8ha)	8.1ha	Commercial and industrial buildings, car parking areas and some open land	Defensible boundaries, formed by roads and woodland areas
5	Pirbright Barracks	46% (33.7ha)	74ha	Barracks, offices, shooting ranges, areas of open land	Visually enclosed and defensible boundaries formed by woodland and canal
6	Keogh Barracks	40% (8.4ha)	21ha	Open land, barracks, offices, museums, parade grounds, playing fields, Mytchett Lake	Visually enclosed by woodland, treebelts along railway and canal form defensible boundaries
7	Pirbright Institute	46% (4.9ha)	10.7ha	Institute buildings, car parking areas, areas of derelict brownfield land	Visually enclosed, defensible boundaries formed by woodland and roads

2. Policy Background

Site		% built development	Total site area	Uses and character	Defensible boundaries
8	Bisley Camp	21.4% (8.4ha)	37.4ha	Open land, historic barracks, offices, visitor centre, shooting ranges.	Incomplete, due to sparse arrangement of buildings and resulting open character
9	BTRE Vokes, Normandy	13% (1.1ha)	8.7ha	Open land, car parking areas and isolated commercial buildings	Incomplete, due to sparse arrangement of buildings and resulting open character
10	Merrist Wood College	50% (6.4ha)	12.7ha	Agricultural buildings sparsely arranged within open grounds. Areas of open land contribute to the openness of the wider Green Belt	Defensible boundaries are incomplete or absent
11	RHS Wisley	43% (9.4ha)	21.8ha	Sparsely arranged visitor centre, glasshouses and horticultural buildings, open gardens and grounds.	Defensible boundaries incomplete or absent

2.10. Pegasus Group conclude that sites 1-7 should be inset from the green belt and that sites 8-11 should continue to be 'washed over' by the green belt.

3. Draft Policy 2

The case for inseting Merrist Wood from the Green Belt

- 3.1. The college's contention is that if these criteria are applied properly and consistently then Merrist Wood College should also be inset from the Green Belt.
- 3.2. Local and national planning policy requires that land which it is unnecessary to keep permanently open, should not be included in the green belt.
- 3.3. We do not accept the findings of the Green Belt and Countryside Study that concludes that it would be inappropriate to inset Merrist Wood College from the Green Belt. We believe the specified criteria have not been applied consistently and if they had, Merrist Wood would have been proposed to be inset from the Green Belt and treated similarly to other undesignated sites.

% Built Development

- 3.4. Of the 11 sites examined, seven were identified as being appropriate for inseting in the Green Belt. Merrist Wood has the second highest proportion of built development on site, more than five of the other sites that are proposed to be inset from the Green Belt. This is significant and conveys that the educational campus is packed tightly with development, with minimal areas of open land, particularly when compared with other developed sites in the Green Belt. The council's study concludes that 6.4ha of built development exists on site. This is five times as much development as exists on the University of Law site.

Total Site Area

- 3.5. Again, when compared with the seven sites proposed for removal from the Green Belt, only two sites are larger than Merrist Wood in overall area. At 12.7ha in size, Merrist Wood is twice as large as Mount Browne Police HQ, and three times the size as the University of Guildford site. Both these sites have been proposed to be inset from the Green Belt.
- 3.6. It has been consistently acknowledged by the council that Merrist Wood College is a major previously developed site in

3. Draft Policy 2

the Green Belt and that policy has continued to support the expansion of the college campus.

Uses and Character

- 3.7. The council's study states that the campus includes 'agricultural buildings sparsely arranged within open grounds. Areas of open land contribute to the openness of the wider Green Belt'.
- 3.8. We strongly disagree with this description. College's land ownership covers an area of over 400 acres. However, the main educational facilities comprise of two distinct areas, the northern and southern campuses. The northern campus comprises teaching blocks, canteen and meeting space, student accommodation, sports pavilions, glasshouses, and workshops. There are large areas of car parking and other hard surfacing. The northern campus is situated on a ridge and contained by trees and ancient woodland on all aspects.
- 3.9. The southern campus accommodates one of the largest indoor equine arenas in the south east, with sprawling areas of hardsurfacing, storage sheds and machinery warehouses. The site is contained to the south by woodland and Holly Lane, a main route into Worplesdon.
- 3.10. The site is not sparsely arranged within open grounds and the land within the northern or southern campuses does not contribute to the openness of the wider Green Belt. Merrist Wood has the second highest proportion of built development on site, more than five of the other sites that are proposed to be inset from the Green Belt. This is significant and conveys that the educational campus is packed tightly with development, implying minimal areas of open land.
- 3.11. It is important to note that the boundary proposed for the site when it was designated as a 'Major Developed Site (MDS) in the Green Belt' under draft Policy 9 'Villages and major previously developed sites' of the Draft Local Plan (Regulation 18 – July 2014) only included that land covered by the northern and southern campuses. The built facilities of the College are split in two by open fields used as pasture and for sports but this land was never included within the MDS boundary.

3. Draft Policy 2

Defensible boundaries

3.12. The main criticism of the site by the council is that the defensible boundaries of the site are incomplete or absent. Again, we strongly disagree with this conclusion.

3.13. As mentioned above, the northern campus is situated on a ridge and contained by trees and ancient woodland on all aspects. This means that substantial built development on this part of the campus is screened from wider views and therefore contributes little to openness of the Green Belt.



Northern campus

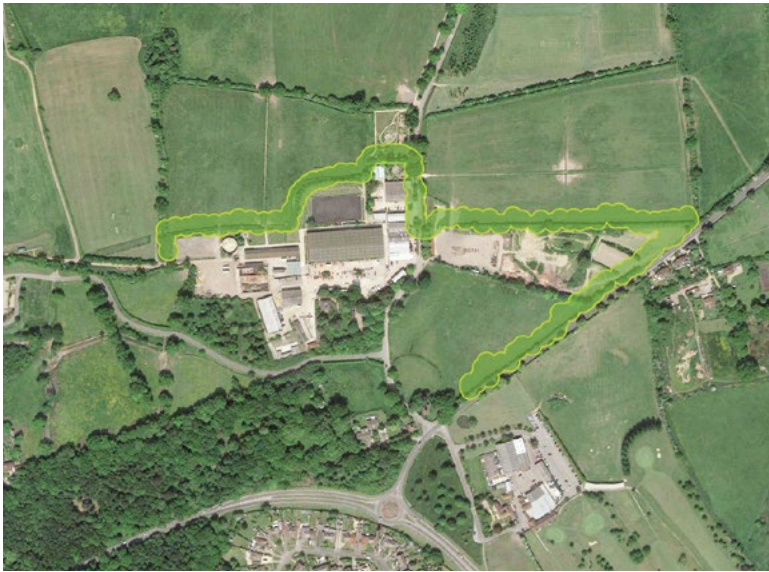
3.14. The southern site too benefits from defensible boundaries including the existing trees, hedges, and roads to the south. These combine to create a clear demarcation of the site's developed areas on the landscape.



Southern campus

3. Draft Policy 2

3.15. In any event, the site's defensible boundaries could easily be strengthened through a landscaping scheme; either implemented as immediate plans or as part of redevelopment works for the campus, which are in the process of being prepared and have been discussed with the Council through the pre-application process. The college has sufficient land ownership around the site to allow boundary strengthening works to proceed easily.



Southern campus including additional landscaping

3.16. Even if Merrist Wood Campus is inset from the Green Belt, we would only expect the built facilities of the College to be inset. This would be consistent with the approach taken to the previously proposed MDS boundary. Furthermore, a variety of other development management policies would ensure that any development inappropriate for the site is avoided.

4. Development aspirations

- 4.1. Insetting the Merrist Wood College campus from the Green Belt would also assist the College in realising their development aspirations to modernise and grow the College.
- 4.2. The Merrist Wood College campus is in need of urgent investment and renewal. It operates from facilities which are no longer fit for purpose by modern teaching standards and it is suffering from a prolonged period of under-investment.
- 4.3. The outdated accommodation is expensive to maintain. The campus desperately needs to re-invest in order to improve its educational offer and become financially viable and self-sustaining. Without such investment, there is a very real danger that prospective students will venture elsewhere to colleges with considerably better facilities. Although the college is well regarded locally, it is falling behind the top performing land based colleges at a crucial time when the higher and further education sector is in a state of flux.
- 4.4. The college wishes to improve its education offer through a series of enhancements to the campus and its facilities. These aspirations have been shared with the Council through their pre-application process and we expect to submit a planning application for this improvements shortly .

5. Proposed amendments

- 5.1. Our client is concerned that the Submission Local Plan is unsound for the following reasons:
- 5.2. 1. The plan fails to present the most appropriate strategy for the Borough's previously developed sites within the green belt, based on the Council's own evidence, and is therefore **not justified**.
- 5.3. 2. Through failing to channel appropriate development to the Borough's previously developed sites in the green belt on a consistent basis, the plan does not provide for the most sustainable pattern of development over the plan period and is therefore **inconsistent with national policy**.
- 5.4. We request an amendment to the supporting text to draft Policy 2 as follows:

Para 4.3.15 The following major previously developed sites are now inset from the Green Belt: Henley Business Park, HM Prison Send, Keogh Barracks, Mount Browne, Pirbright Barracks, Pirbright Institute, the University of Law Guildford and Merrist Wood College.

Examination in Public

- 5.5. We wish to appear at the forthcoming Examination in Public to present our case on this matter.

Appendix 4


Merrist Wood Development Footprint Plan

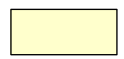


KEY

NORTH


 Previously Developed Site - 8.2ha

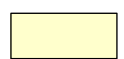
 Development Footprint (overall) - 3.4ha including buildings, highways and railways

 Open Space - 4.8ha including parkland, informal green space churchyards and gardens

SOUTH

 Previously Developed Site - 4.5ha

 Development Footprint (overall) - 3ha including buildings, highways and railways

 Open Space - 1.5ha including parkland, informal green space churchyards and gardens

Revisions:
First Issue- 14/12/2016 AD

Appendix 4

**Merrist Wood College
Guildford Green Belt
Vol V Addendum**

Client: Guildford Borough Council

DRWG No: **BNL.0287_38** Sheet No: **1/9** REV: **_**

Drawn by : AD Approved by: RF

Date: 14/12/2016

Scale: 1:5,000 @ A3

