

Matters 7 and 9 Hearing Statement

Lichfields Appendices

10 May 2018

LICHFIELDS

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**Appendix A: Lichfields Critique of 2017
Employment Land Needs Assessment**

Briefing Note

Our ref 13719/SB/CGJ
Date May 2018
From Lichfields & Cassidy Slyfield Ltd

Subject **Lichfields Critique of 2017 Employment Land Needs Assessment
GBC-LPSS-SD-007**

1.0 Introduction

- 1.1 This appendix provides a technical critique of the Council's updated Employment Land Needs Assessment (ELNA) (March 2017) (GBC-LPSS-SD-007). We previously critiqued the Council's 2015 ELNA in our representations to inform the work of the Officers that were taking the Council's Regulation 19 Local Plan through consultation, which was scheduled at the time for June 2016.
- 1.2 Our critique of the 2015 ELNA concluded that the previous Proposed Submission Local Plan was unsound because it failed to positively and pro-actively plan for growth as required by the NPPF and that the forecast industrial land requirement and allocated land area in the Proposed Submission Local Plan was unsound.
- 1.3 As the 2015 ELNA contained a number of issues, we believe it is important the 2017 update is critiqued thoroughly to ensure that the Council in the Submission Local Plan is providing enough floorspace and land for businesses going forward, and is also planning effectively for new employment development.

2.0 Approach

- 2.1 To thoroughly review 2017 ELNA, we have followed a three-stage approach. Our approach examines how the forecast net industrial land requirement from 2017 compares to the Council's previous evidence base documents; reviews in detail each step of the forecast methodology used in the ELNA including the inputs and assumptions; and sensitivity tests the effect of modifying some of the assumptions and inputs from the ELNA on the forecast net industrial land requirement for the Submission Local Plan period (2016-2034). The critique then concludes with an outline of the ELNA's main issues.

3.0 Past Forecasts

- 3.1 The Council's Employment Topic Paper (December 2017) (SO-TP-005) on page 14 in Table 1 provides a breakdown of the quantum of industrial land forecast in previous evidence base documentation. The 2017 ELNA forecasts that the Borough will require between 3.7 and 4.1ha of net additional industrial land over the Submission Local Plan period (2016-2034). The forecasts from the 2015 ELNA are not directly comparable to the update as they rely on assuming past trends continue over the previous proposed Local Plan period, while the update is informed by three separate employment forecasts from Cambridge Econometrics, Experian and Oxford Economics (p.45). However, the forecasts do highlight how changes in methodology among other variables can affect forecast future demand.

- 3.2 The 2015 ELNA forecast the Borough would require between 4.7ha and 5.3ha of net additional industrial land from 2015 and 2033, which is higher than the 2017 ELNA. Prior to the 2015 ELNA, the Council's own Employment Land Assessment (ELA) and unpublished 2014 ELA also forecast higher levels of demand (9.0ha and 13.9ha) than the 2017 ELNA for the period between 2013 and 2031. Both ELAs use a different demand forecasting method than the 2017 and 2015 ELNAs, highlighting the effect that different methods can have on the level of demand forecast among other variables such as the data used to inform forecasts at the time.

4.0 ELNA Forecast Methodology

Scenario Selection

- 4.1 As outlined above, the 2017 ELNA draws on three separate employment forecasts from Cambridge Econometrics, Experian and Oxford Economics (Page 45) and fuses them together with an analysis of previous change in B Class floorspace, drawing on Valuation Office Agency (VOA) Business Floorspace Statistics (2012) (Page 42)¹. This method matches the labour demand approach which is recommended by the Planning Practice Guidance (PPG) on housing and economic development needs assessments and acknowledged in the ELNA planning policy context chapter (Chapter 2)².
- 4.2 The 2017 ELNA does not include demand forecasts that draw on other methodologies included in the PPG for forecasting future demand including demographically derived assessments of future employment need (labour supply) and past take-up of employment land and property market signals. Both methods are partly factored in over the ELNA's forecast processes (as covered below) but are not considered separately, and therefore it is questionable whether the ELNA fully considers both in its net additional industrial land requirement.

Employment and Floorspace Past Trends

- 4.3 The employment and floorspace data the ELNA uses as part of its two-pronged approach for forecasting employment land demand was out of date at the time of publishing. To analyse past employment trends the ELNA uses Annual Business Inquiry (ABI) and Business Register and Employment Survey (BRES) data from the Office for National Statistics (ONS) to cover the period from 2004-2012 (Paragraph 6.5.1). This is an acceptable approach as both sources of data are considered as the best publicly available sources of data for this type of analysis. However, the 2017 ELNA simply carries over the analysis from the 2015 ELNA and does not incorporate the latest available BRES data, which would allow for the analysis to extend from 2012 to 2015. The data was publicly available in September 2016, over six months before the 2017 ELNA was signed off.
- 4.4 The floorspace analysis in the 2017 ELNA (Paragraphs 6.4.1 to 6.4.5) is also carried over from the 2015 version. The VOA data used in the 2015 version was the latest available at the time but was subsequently updated in December 2016. The updated publication extended the time series to 2016, allowing for a further four years of analysis from 2012. If the past trends period is extended to 2016, the compound aggregate growth rate (CAGR) for change in industrial floorspace in the property market area (PMA) increases from 0.43% to 0.54%³. This shows that the 2017 ELNA underestimates the actual scale of past change in industrial floorspace.

¹ Valuation Office Agency (VOA), (2012); Business Floorspace (Experimental Statistics)

² <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

³ VOA, (2016); Business Floorspace

- 4.5 It is not possible to replicate this analysis for employment as the 2017 ELNA does not include a detailed outline of how AECOM has assigned different standard industrial classification (SIC) codes to B class uses. This is typically included in the appendices of an ELNA and highlights the severe lack of transparency in how AECOM has carried out this analysis. The failure to utilise the latest available data sources for the past trends analysis also indicates that Council did not commission AECOM to update this part of the demand section, bringing into question whether the 2017 ELNA forecasts is a true update of the 2015 ELNA.

Employment Forecasts

- 4.6 The ELNA is mainly opaque in how the three employment forecasts are used to analyse the change in jobs typically associated with B Class premises. As with past employment analysis, no details are provided on how AECOM has assigned the different sectors included in each forecast to B class uses (Paragraphs 6.6.1 to 6.6.4). As shown in the ELNA Appendix 1, each of the three forecasting companies has its own set of sectors, which can vary in the SIC categories that are included in them and therefore, a bespoke method of assigning the sectors to B class uses is required for each forecast. No details are provided by AECOM on their method for splitting out each forecast, and therefore it is impossible from what details are provided in the ELNA to assess whether the methods are robust.
- 4.7 After assigning the employment forecasts to B class sectors by unknown means, the ELNA then uses a blended average of the CAGRs from each forecast to then project forward change in B class employment from an estimate of current workforce employment (Table 6-3). Instead of using the employment forecasts as the basis for estimating current workforce employment, the ELNA uses a combination of the ONS BRES and Workforce Jobs datasets (Paragraph 6.6.6). This is an unnecessary step as the forecasts will all include an estimate of workforce employment.

Floorspace Projections

- 4.8 To forecast future demand going forward the ELNA assumes that future employment is the known variable and floorspace is the unknown (Paragraph 6.7.1). Therefore, to project employment floorspace demand going forward the ELNA uses the blended CAGRs calculated from the employment forecasts, which are then adjusted based on a ratio of change in floorspace and employment (Table 6-4). While this approach does combine future and past trends, it means the projected rate of growth in floorspace demand in the PMA assumes that employment densities in industrial premises will continue to increase. This is not realistic as eventually, it will not be safe to increase employment densities anymore, at which point the actual requirement for employment land going forward will be higher.
- 4.9 In addition, the relationship between change in industrial floorspace and employment may not be as elastic as assumed in the ELNA. It is just as likely that delivery of new floorspace is highly inelastic when compared to the creation of jobs, and therefore the lower delivery of floorspace against jobs is unlikely to reflect actual demand or need for industrial and storage floorspace.

Guildford Borough Floorspace Demand Forecast

- 4.10 The ELNA forecasts employment floorspace demand for Guildford specifically by applying the adjusted CAGR from the PMA floorspace projections section to the assumed quantum of industrial floorspace in Guildford as of 2016 (Paragraph 6.9.1). This is calculated by using the 2012 VOA data as a base and then extending it forward using monitoring data from the Council, coming out with a figure of 371,500sq.m for 2016 (Paragraph 7.9.2). The area is lower than in

the latest VOA floorspace data (383,000sq.m), which as outlined previously was available in December 2016, before the ELNA was published.

- 4.11 If the 383,000sq.m had been used in the ELNA the net additional requirement for industrial floorspace in Guildford over the Local Plan period would be higher than between 7,400sq.m and 9,000sq.m (Table 6-6). Based on how the floorspace is presented in Table 6-6, it is also unclear whether the forecast floorspace demand is net internal area, gross internal area or gross external area. This could have implications for the actual quantum of floorspace required considering the ratios used to convert floorspace to land are based on gross floorspace.

Forecast for Industrial Land 2016-2034

- 4.12 To convert the forecast industrial floorspace need for Guildford into a land area, the ELNA uses a plot ratio of 1:0:45 from the Office of the Deputy Prime Minister Employment (ODPM) Land Review Guidance Note (2004)⁴ (Paragraph 6.11.2). When applied to the floorspace this results in forecast areas of 1.6ha, 1.8ha and 2ha. A decrease from the result of the 2015 ELNA. These values are then put through a large table which ends with a final net requirement of between 3.7 and 4.1ha of industrial land for the Local Plan period (Table 6-7). There are several issues with how the ELNA gets to this range, in addition to the issues already highlighted with the rest of the forecasting method.
- 4.13 At the start of the Table 6-7 the ELNA estimates that the Borough currently has a supply of 82.5ha of industrial land, based on converting the Borough's assumed and likely incorrect stock of industrial floorspace (371,500sq.m) using the same plot ratio as for converting the forecast. The ELNA uses this method rather than calculating supply based on the list of existing sites, in which the strategic employment sites with a mix of B1, B2 and B8 uses total 94.7ha in area (Table 4-1)⁵. The ELNA does not use this or an equivalent figure as some of the sites also include some office and non-B uses (Footnote 52, Page 50). This misses the fact that other uses will likely take some premises in new industrial developments, meaning that a buffer is required to ensure some redundant capacity is available going forward and therefore the current supply position should also reflect it. It would be more appropriate to use the 94.7ha or equivalent as the basis of supply than the method the ELNA uses. If using the 94.7ha as the current supply position, the area of vacant industrial land in the Borough increases to 2.3ha from 2.0ha in the ELNA.
- 4.14 After going through steps, A to E in Table 6-7, the ELNA applies a frictional vacancy rate of 5% to the quantum of existing occupied industrial land, forecast industrial land demand and demand for utilities, transport and waste management land to allow for a certain level of market vacancy. The principle behind the frictional rate is questionable as it is based on the Greater London Authority's (GLA) Land for Industry and Transport Supplementary Planning Guidance (SPG) (2012)⁶, which is not referenced in the ELNA despite forming an important part of the demand forecast. Guildford is not in London, so it is questionable whether the concept should be applied in this case.

⁴ Office of the Deputy Prime Minister (ODPM), (2004); Employment Land Review Guidance Note

⁵ Future labour supply is considered in the employment forecasts used for the labour demand scenarios; however, these are also reliant on other inputs and therefore cannot be considered as a proper substitute for a full labour supply scenario.

⁶ Greater London Authority, (2012); Land for Industry and Transport Supplementary Planning Guidance

5.0 Demand Sensitivity Testing

5.1 To highlight the effect of changing the inputs and assumptions behind the ELNA's forecasts. We have produced an example forecast based on what can be gleaned on the assumptions in the ELNA. This acts as a sensitivity test for the inputs and assumptions. Table 1 below presents the example forecast. To produce the forecast the supply of industrial land has been updated to 94.7ha to represent the stock of strategic employment sites with a mix of B1, B2 and B8 premises in Guildford currently; and the floorspace demand forecast has been updated to use 383,000sq.m as the base floorspace area for 2016. Table 1 also removes the adjustment that the ELNA makes to the rate of growth in future industrial employment based on a ratio between past change in employment and floorspace (Table 6-4). This assumption as outlined earlier is dubious and the analysis is also now out of date considering the time scale used for the analysis (2004-2012).

Table 1 Example Demand Forecast

Additional elements of demand for industrial/storage land	Low (ha)	Medium (ha)	High (ha)
A. Supply of occupied industrial land (2016)	92.5		
B. Current vacant industrial land (2.4%)	2.3		
C. Total industrial land (2016)	94.7		
D. Land demand to 2034 (at 45% plot ratio)	4.2	4.7	5.2
E. Additional demand for utilities, transport and waste management 2016-2034	-		
F. Optimum frictional vacant land at 2034 (5% of A+D+E)	4.8	4.9	4.9
G. Excess vacant land: optimal levels of frictional land minus existing vacant industrial land (F-B)	2.6	2.6	2.6
H. Gross requirement for industrial land 2016-2034 (C+D+E+G)	101.5	102.0	102.5
I. Net requirement for industrial land 2016-2034 (H-C)	6.8	7.3	7.8

Source: Lichfields analysis

5.2 The table produces a net industrial land demand requirement of between 6.8ha and 7.8ha, which is significantly higher than the ELNA and shows how sensitive the forecast method is to small modifications in the inputs and assumptions. If the 2017 ELNA were more transparent about its method then additional sensitivity testing would have been possible; however, unfortunately, this is not the case.

6.0 Conclusions

Past Forecasts

6.1 A review of the Council's previous evidence base forecasts provided as part of the Council's Employment Topic Paper (December 2017) shows how the forecast industrial land requirement for the Borough has continually decreased over the past 5 years, reaching 3.7-4.1ha in the 2017 ELNA. The scale of decrease is substantial and while the Council was not involved in the direct production of the 2015 and 2017 ELNAs, the forecasts do still indicate a lack of ambition within

the Council to provide floorspace and land for industrial businesses going through the Submission Local Plan period.

ELNA Forecast Methodology

- 6.2 There are several faults with forecast methodology of the 2017 ELNA. Firstly, it does not contain any forecasts based on labour supply and past take-up, which are two of the other methods included in the PPG guidance on forecasting need for employment land alongside labour demand, which is all the ELNA uses. The PPG outlines that plan makers 'should' consider these methods, so it is debatable whether the ELNA is PPG compliant.
- 6.3 The 2017 ELNA uses analysis of past floorspace and employment trends carried over from the 2015 ELNA. This is now out of date and should have been updated given newer data sources were available months before the ELNA was signed off by the Council. This means that the forecast is informed by out of date information.
- 6.4 The out of date past trends analysis feeds into the forecast by adjusting the PMA CAGR of future employment growth to take into account the past trend of change in floorspace and employment. For industrial land this means assuming growth in employment floorspace will continue to increase at a rate 2.5 times lower than employment, inferring that industrial employment densities will continue to increase with end limit. This is not realistic and brings into question whether adjusting the rate of future employment growth with past trends is sound.
- 6.5 To forecast floorspace demand the CAGR of future employment growth is applied to the estimated stock of industrial floorspace (371,500sq.m) in the Borough in 2016, which has been calculated in the ELNA by extending the quantity of floorspace taken from out of date VOA data to 2016 using the Council's own monitoring data. Based on updated VOA data that was available before sign-off this is an underestimation and the actual area should be 383,000sq.m.
- 6.6 To finalise the forecast net industrial land requirement for Guildford the ELNA relies on using the incorrect industrial floorspace estimate (371,500sq.m) and converts it using a ratio. It does this as some of the strategic employment sites with industrial uses can also contain some office and non-B uses. This fails to reflect that industrial sites will typically contain some other uses and that these should be considered when allocating industrial land in the future, and therefore considered in the current supply position, which based on the strategic employment sites equates to 94.7ha rather than 82.5ha.
- 6.7 The ELNA also uses a frictional vacancy rate of 5% as part of the final net industrial land requirement calculation in Table 6-7. This concept is based on a GLA SPG, so it is questionable whether a concept specific to London should be applied to Guildford, which obviously is not located in London.

Demand Sensitivity Testing

- 6.8 To review the effect of changing some of the inputs and assumptions on Guildford's net industrial land requirement an example demand forecast has been produced. Forecasting a requirement of between 6.8ha to 7.8ha of net additional industrial land. This highlights how sensitive the ELNA's demand forecasting method is and that by updating some of questionable inputs and assumptions made by the ELNA, the end result can be significantly higher.
- 6.9 Additional sensitivity testing could be done using the ELNA's forecast methodology; however, unfortunately, the ELNA is opaque on many of its assumptions and inputs, so it is not possible to interrogate much further. This further brings into question whether the ELNA's forecast is



robust and whether the document can be trusted to inform what industrial land the Council allocates in the Submission Local Plan.

**Appendix B: Lichfields Representation
Letter submitted 18 July 2016 to the
Guildford Proposed Submission Local
Plan: Strategy and Sites- Regulation 19
Consultation**

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Date 18 July 2016
Our ref 13719/SB/BH/SBe/11842322v2
Your ref -

By post and email: planningpolicy@guildford.gov.uk

Dear Sir or Madam

Guildford Proposed Submission Local Plan: Strategy and Sites - Regulation 19 Consultation

Land North of Slyfield Industrial Estate (Formerly Site 63): Representation on behalf of Cassidy Slyfield Ltd and Mr & Mrs Mostyn

Nathaniel Lichfield & Partners (NLP) has been instructed by Cassidy Slyfield Ltd ('our client') to submit a representation on the above draft Proposed Submission Local Plan.

We do so on behalf of our client and Mr & Mrs Mostyn, who each own part of the proposed site located immediately to the north of the Slyfield Industrial Estate (SIE) (i.e. former site allocation 63 in the consultation draft Local Plan, July 2014). They are jointly promoting the removal of the site from the Green Belt to enable the expansion of the SIE.

These representations are in response to what we believe is a wrongful and unsound decision by the Council to remove an allocation for employment land in the draft Proposed Submission Local Plan. We urge the Council to reinstate this allocation prior to submitting the draft Local Plan for Examination and provide the reasons for doing so here.

Local Plan Examination

Our client and Mr and Mrs Mostyn (and their professional advisors) reserve the right to attend the Local Plan Examination. We would welcome the opportunity to participate, so as to contribute to the discussion of the Inspector's questions arising from our and other relevant representations for the soundness of the employment allocations in the Plan and the robustness of the evidence base underpinning it.



The North Slyfield Site

The 4ha site ('North Slyfield Site') is owned by (1) Cassidy Slyfield Ltd and (2) Mr and Mrs Mostyn, local Jacobs Well residents (see attached plan, Annex 1).

It adjoins Slyfield Industrial Estate (SIE) and also Slyfield Area Regeneration Project (SARP). It is currently unused scrub land with a public footpath running along the northern and eastern boundaries linking Jacobs Well with SIE.

It is an excellent option for extending the Borough's premier industrial estate which is in high demand and has no real capacity to expand through intensification.

Allocation History

The Draft Local Plan: Strategy and Sites (July 2014) took the North Slyfield Site out of the Green Belt and allocated it as a sustainable extension to the industrial estate for "*light industrial (B1c) and / or general industrial (B2) and / or storage and distribution (B8)*" uses (Site 63). The allocation is in Annex 2.

This was a sound, evidence-based allocation which should have been carried forward in the Submission version of the draft Local Plan in order to contribute towards meeting the need for additional employment land in the most sustainable and appropriate, strategic location.

In response to the Council's consultations, there were very few negative representations to the allocation and a number of responses in support, including from the Guildford Society (see below).

Our client was very surprised that the Council has now changed its mind and instead is recommending reliance on employment allocations in the contentious strategic Green Belt sites at Wisley Airfield in Ockham and Garlick's Arch in Send Marsh / Burntcommon. The stated reasons for the Council volte-face are that:

- there has been a reduction in the amount of additional employment land that is required since 2014; and
- "*the site was not identified [for development] in the Green Belt and Countryside Study and is located within high sensitivity Green Belt*"¹.

Previous Representations Submitted on Behalf of Cassidy Slyfield Ltd and Mr and Mrs Mostyn

Our client has previously submitted the following documents in support of removal of the North Slyfield Site from the Green Belt and its allocation for employment purposes:

- 1 Representations in response to Issues and Options consultation on Draft Local Plan Strategy and Sites, submitted by email and post (29 November 2013). These documents, which make both the case for removal of the North Slyfield Site from the Green Belt and allocation for employment purposes, comprise:

¹ GBC Executive Meeting, 11 May 2016, [Item 03 \(14\) - 4C Comments on Site Allocations & Appendices & question responses, item 3](#)



- Planning Assessment, including Landscape and Visual Appraisal and completed Local Plan Strategy and Sites Issues and Options Questionnaire (Annex 3)
- Executive Summary (Annex 4).
- 2 Representations letter in response to Draft Guildford Local Plan: Strategy and Sites (July 2014) Consultation: letter dated 19 September 2014, sent by email and post (Annex 5).
- 3 Letter dated 18 January 2016 responding to the public and stakeholder representations on the North Slyfield Site (Site 63) received by the Council following its July 2014 consultation in respect of the Draft Local Plan (Annex 6).
- 4 Letters and photographs to Councillors dated 6 and 24 May 2016 (Annex 7).
- 5 Briefing Note provided to all GBC Councillors in advance of the 11 May Executive Committee Meeting (Annex 8).

We attach further copies of these documents (for Officers' convenience and to assist the Inspector's consideration).

Outline of the Case for Employment Allocation of the North Slyfield Site and its Removal from the Green Belt

The case for the North Slyfield Site to be re-allocated for employment purposes and removed from the Green Belt can be summarised as:

Employment Reasons for Allocation

- 1 There is a quantitative need to allocate additional employment land in the Borough.
- 2 There is a qualitative need to provide additional employment land adjacent to SIE, Guildford's premier industrial / warehousing location.
- 3 The North Slyfield Site would be more easily delivered than the other employment allocations.
- 4 The allocation of the North Slyfield Site would positively support other Council strategies.

Green Belt Reasons for Allocation

- 5 Development of the North Slyfield Site would not harm the Green Belt or landscape.

Site Characteristics Reasons for Allocation

- 6 The North Slyfield Site is preferable compared to the employment allocations in the Proposed Submission Local Plan.

Local Plan Consultation Responses

- 7 The allocation of the North Slyfield Site for employment purposes did not arouse a significant degree of opposition from the general public or other stakeholders.

We address each of these key issues below.



1. There is a quantitative need to allocate additional employment land in the Borough

As you will be aware, NLP is an acknowledged expert and market leader in the field of preparing and assessing employment land reviews across the UK, and is engaged in this capacity by numerous local planning authorities. NLP's expert Economics team has reviewed the Council's Employment Land Needs Assessment (ELNA) (2015) and associated documents in order to advise in respect of the Council's assertion that there has been a reduction in the amount of additional employment land that is required in Guildford since the North Slyfield Site was allocated in the Draft Local Plan two years ago in July 2014. In particular, NLP has reviewed the methodology used in the ELNA to assess future employment land requirements in Guildford to consider whether it represents a robust approach.

The ELNA estimates there is a requirement for between 4.7 ha and 5.3 ha of industrial and storage land in Guildford during the period 2015 to 2033 (i.e. a maximum of only 0.3 ha of land each year over the life of the Plan). This has been adopted by the Council as the industrial allocation in Policy E1 (Sustainable Employment) of the Proposed Submission Local Plan to support industrial job growth during the plan period.

Assuming a plot ratio of 0.45 for industrial and storage land as used in the ELNA, this industrial requirement would enable the delivery of a maximum of only 23,850 sq.m of industrial and storage floorspace over the plan period, equivalent to 1,325 sq.m of floorspace per annum.

NLP's review of the ELNA considered whether the methodology used in the study suitably meets the guidance for Housing and Economic Development Needs Assessments (ID: 2a) outlined in the Planning Practice Guidance (PPG). Overall, the methodology used in the ELNA was considered to largely meet the guidance set out in the PPG although some limitations to the study were identified which reduce the soundness of the requirements estimated for Guildford. These are: 1) reliance on historic trends to estimate future requirements and 2) limited consideration of local business and market conditions and needs to inform the future requirements.

The requirement for industrial and storage land in Guildford estimated in the ELNA was based on the assumption that recent trends of floorspace and job growth will continue into the future. This means if industrial job growth has outstripped industrial floorspace growth historically, this trend is assumed to continue through the plan period 2015 to 2033. In this context, the ELNA indicates that industrial job growth has outstripped industrial floorspace growth in the Property Market Area (PMA) for Guildford over recent years. This means that the amount of new floorspace that was estimated to be required to support the forecast growth in industrial jobs in Guildford was also at a lower rate, in order to reflect past trends, which contributed to the small requirement for industrial and storage land identified in the ELNA.

This trend of industrial job growth outstripping industrial floorspace growth was assumed in the ELNA to simply reflect that the current industrial floorspace in the Guildford PMA was being more effectively used, with this trend of increasing employment densities assumed to continue into the future. However, we assert that the lower industrial floorspace growth compared to industrial job growth in the Guildford PMA is just as likely to reflect that the delivery of new floorspace is highly inelastic compared to the creation of new jobs.

This means that the lower industrial floorspace growth compared to industrial job growth in the Guildford PMA is unlikely to reflect lower **demand** or **need** for industrial floorspace, but rather the



difficulties of delivering new industrial floorspace to the market (e.g. due to land constraints or limited site opportunities). In fact, the ELNA supports the view that industrial floorspace growth in Guildford has not been at a high enough level over recent years to keep up with demand in the local market, stating the following in Paragraph 5.4.6:

“Consultations with property market experts suggested that the current supply of industrial and storage premises is not meeting existing demand. There is a lack of available sites and these sites tend not to deliver the quality and type of space occupiers need.”

If recent growth in the supply of industrial floorspace in Guildford is assessed to have not been high enough to meet demand in the local market, it is therefore reasonable to assume that the use of historic trends to estimate future requirements is not a sound methodology. **This is therefore the key limitation of the methodology used in the ELNA, as it estimates a small industrial and storage requirement that reflects a historic under-supply of floorspace in Guildford. We consider that planning for such a small industrial land requirement in the new Local Plan would continue to under-supply the market and constrain the growth potential of businesses, which represents an unsound approach to positively planning for growth in Guildford.**

In fact, the ELNA also recognises the possibility that demand for industrial land in Guildford is actually higher than the estimated requirements in the study. This is due to the supply of floorspace being highly rigid and unable to reflect increases in demand over the short term, with the ELNA stating the following in Paragraph 7.2.5:

“Demand for employment land within Guildford could be higher than these and land floorspace forecasts. Employment within the borough has the potential to grow more quickly than currently anticipated, while demand for additional space on the part of businesses already located within the borough could be higher given the extent to which employment densities have risen in recent years.”

This small **industrial land requirement is not sound** as it is not positively planning for growth in Guildford. This is particularly so in the context of the upper range requirement estimated in the ELNA (i.e. 5.3 ha of industrial and storage land) being **40% lower than the requirement** estimated in the previous Employment Land Assessment (ELA) published in **2013** (i.e. 9 ha over the period 2013 to 2031) and **60% lower than the requirement** estimated in the Council's unpublished ELA prepared in **2014** (i.e. 13.9 ha over the period 2013 to 2031).

In this context, it is useful to consider the potential reasons why the requirement for industrial land in Guildford is said to have declined so substantially between the ELA (2013) and ELNA (2015). We note the ELNA included very limited consideration of underlying economic and market factors in Guildford when estimating the forecast industrial requirements. This contrasts with the ELA which did include some consideration of conditions in the Borough, which we believe improves the validity of these forecast requirements and better reflects national guidance in the PPG in terms of considering recent market signals when estimating future needs. Such underlying economic and market factors taken into account by the ELA includes prevailing gaps in the local market (e.g. the need for move-on premises and new, good quality premises), needs of local businesses in regards to the type of space they require to support their growth plans, and the future economic growth aspirations of the Council.

Taking these factors into consideration, the ELA estimates there will be an increase in demand of between 4 ha and 9 ha for industrial and storage land over the period 2013 to 2031. This forecast



industrial requirement takes into account the fact there has been very limited supply of industrial premises in the Borough over recent periods, which is likely to have constrained business growth in the local market, as well as the fact the Council needs to “*support innovation, new business and growth in all sectors and ensure we help the borough’s economy to diversify*” [paragraph 4.3.9]. In addition, the risk associated with not delivering enough industrial space in Guildford is identified in Paragraph 4.3.10 of the ELA, stating that by not planning for an “*increase in B2 floor space, we may discourage businesses from locating in the borough and may prevent existing businesses from expanding.*”

Overall, we believe the approach used in the ELNA to estimate the forecast industrial and storage land requirement for Guildford has inherent shortcomings, which reduce the soundness of the forecast requirements carried forward in to the Proposed Examination Local Plan. This is highlighted by the surprising disparity in the range of the requirements estimated over the past three years. The amount of industrial and storage land that should be planned for in the new Local Plan should be higher than the currently proposed requirement, in order to take into account underlying economic and market factors in the Borough that have not suitably been taken into account in the ELNA.

The failure to positively prepare to provide adequate employment land is also unsound because it is inconsistent with NPPF national policies to: contribute to building a strong and competitive economy [paragraph 7]; support growth and innovation [paragraph 7]; pro-actively meet the development needs of Guildford [paragraphs 14 and 20]; and pro-actively drive and support sustainable economic development to deliver the business and industrial units the country needs [paragraph 17].

The NPPF is crystal clear that “*The Government is committed to ensuring the planning system **does everything it can** to support sustainable economic growth*” [paragraph 19, our emphasis]. In failing to provide adequate employment land allocations, the Proposed Submission Local Plan clearly fails to do “*everything it can*” and is therefore unsound.

2. There is a qualitative need to provide additional employment land adjacent to SIE, Guildford’s premier industrial / warehousing location

In addition to this need for additional employment land across the Borough as a whole, there is a strong and urgent need to positively plan for additional employment land at SIE in the short term to ensure the premier industrial location in the Borough does not miss prospects to attract new businesses and retain existing, growing businesses. The failure to positively plan for expansion of the SIE also means that the Proposed Submission Local Plan is unsound.

The 2015 ELNA identifies a clear shortage of available employment land in the Borough to meet forecast requirements over the plan period, meaning new employment sites need to be designated to help stimulate future growth in the economy.

The recent ELNA refers to the Guildford Business Survey (undertaken in two phases in November 2014 and July 2015). That survey indicated that around one-third of businesses surveyed in the Borough were actively considering relocating, mostly within the Borough. Of particular note from this survey was the desire of businesses to relocate close to their current location with survey



results showing that “*industrial occupiers stated a preference for locating in Slyfield or a similar mid-urban industrial estate location*”².

This evidence base used by the Council to inform the preparation of the Proposed Submission Local Plan therefore points towards a strong need to positively plan for new employment sites in the Borough during the plan period that are suitable for meeting the existing and forecast demand for new employment space, with SIE identified in this evidence base as being a preferred location for industrial firms in terms of supporting their future relocation and growth plans.

However, the ELNA indicated that SIE currently has as little as 185sq.m of vacant industrial space, and limited prospects for intensification or additional space at the estate³. This premier industrial location in the Borough is therefore effectively operating at full capacity and has almost no potential to support future growth in the local economy as it presently stands.

In this context, the North Slyfield Site represents the only location that can enable sustainable industrial / storage growth at the premier industrial estate in the short term. While some light industrial (B1c) and ‘trade counter’ uses are allocated as part of the Slyfield Area Regeneration Project (SARP) to the east of SIE, this would not meet the requirements of industrial / storage businesses and operators. In addition, importantly, the Council’s own assessment identifies significant constraints to developing SARP. It is therefore unknown when SARP as a whole, and allocated Class B1(c) light industrial uses in particular, would come forward for development, but it certainly would not be expected to come forward during the short term (e.g. relocation of the sewage treatment plant alone is expected to take four years).

In the absence of additional employment land at SIE to enable the business community to grow organically, it can be expected the growth potential of SIE would remain constrained in the foreseeable future. Given the importance of the premier industrial location in the Borough, it can also be expected that such constraints will have a negative effect on the economic growth potential of the local economy as a whole.

The Proposed Submission Local Plan is therefore unsound because it fails to positively and pro-actively plan for economic growth as required by the NPPF, particularly at the strategic location in the Borough where there is most demand (i.e. “*in the right place and at the right time*” as required by the NPPF [paragraph 7]).

3. The North Slyfield Site would be more easily delivered than the other employment allocations

It should be noted that, whilst Officers recommend allocations for industrial and storage uses at other strategic Green Belt sites in the Proposed Submission Local Plan (eg. Wisley Airfield and Garlick’s Arch – the latter literally added at the last hour⁴), these potential sites are likely to have greater risks in terms of take-up compared to the North Slyfield Site, given that they cannot draw

² ELNA, paragraph 5.5.4

³ ELNA, Table 4.1

⁴ Site allocation A43 (land around Burnt Common warehouse) was removed from the draft Local Plan and replaced by the Garlick’s Arch site, without any prior consultation, at the GBC Executive meeting on Wednesday 11 May 2016. This amendment was set out on a Supplementary Information Sheet which was made available at the meeting.



on the market value of an established strategic industrial location. In fact the industrial / storage uses allocated at each of these sites (as well as the light industrial uses at SARP) form part of larger mixed-use developments with deliverability issues and which could also create compatibility issues between the housing and industrial uses supported at these sites, particularly in relation to heavier industrial activities. In contrast, the North Slyfield Site adjoins existing industrial activities and is set some distance and shielded from residents at Jacobs Well.

Further, the North Slyfield Site was the only industrial / storage allocation made by the Council that supported the industrial market in the Guildford Urban Area.

Again, the failure to allocate industrial / storage land *"in the right place and at the right time"* means that the Proposed Submission Local Plan is unsound.

4. The allocation of the North Slyfield Site would positively support other Council strategies

An employment allocation on the North Slyfield Site would support a range of other growth strategies and initiatives currently being brought forward by the Council.

As stated above, SIE is identified, in the ELNA, to be a preferred location for industrial businesses in terms of supporting their future relocation and growth plans. The allocation of the North Slyfield Site could therefore re-accommodate growing businesses in the Borough that want to be situated in Guildford Urban Area, which in some cases could release previously developed employment sites in urban areas for housing development. In their representations on the July 2014 Draft Local Plan, the Guildford Society supported allocation of the North Slyfield Site, partly because it could accommodate businesses displaced at town centre / housing allocations including those at Walnut Tree Close (allocations A5, A9, A10, A13 and A14, currently in use as builders merchants, industrial and warehousing).

The release of urban sites for new housing provision supports the **Guildford Town Centre Vision** (2014), which seeks to grow the provision of housing in the town centre. In addition, the support for new housing development at urban sites could help to ease pressure on releasing Green Belt land in the Borough to accommodate the required housing delivery.

Further, an employment allocation at the North Slyfield Site has the potential to help unlock **SARP** by relocating some of the existing or proposed industrial / storage / light industrial uses at SARP to the extended SIE. This would allow a greater proportion of housing to be delivered in SARP, and would ultimately boost the potential development value of the project.

In addition, the growth of the strategic industrial estate through this allocation would reinforce the case for bringing forward the proposed **Clay Lane Link Road**, as the allocation would underline the Council's priority of supporting economic development at the premier industrial location in the Borough and the related need to improve the estate's access to the wider strategic road network.

For these reasons the Proposed Submission Local Plan has not been positively prepared and is therefore inconsistent with the NPPF.



5. Development of the North Slyfield Site would not harm the Green Belt or landscape

The North Slyfield Site was not specifically assessed in the Council's Green Belt and Countryside Study (2013), but formed 10% of a very large parcel of land referenced Land Parcel B3 (LP B3). LP B3 is too large (covering a bigger area than SIE) and varied in quality for any meaningful consideration to be given to the Green Belt boundaries around Jacobs Well and SIE. It includes within it a number of environmentally sensitive areas (i.e. River Wey floodplain, registered common land, SSSI, SPA, SAC and LNR); none of which apply to the North Slyfield Site. As a consequence, when LP B3 was reviewed against four of the Green Belt purposes, it was scored to fulfil all four purposes⁵ and judged to be of 'high Green Belt sensitivity'⁶.

When our initial 29 November 2013 representations (Annex 3) were received by the Council, Officers recommended and Members agreed that the North Slyfield Site should be taken out of the Green Belt and allocated for employment use in the Draft Local Plan (July 2014 consultation version). At that time, the Council agreed with our assessment of the employment, Green Belt and landscape issues. However, we consider that it would have been prudent if the North Slyfield Site had been formally assessed at that time, as a smaller Potential Development Area (PDA) (as many other sites have been, including those in high sensitivity Land Parcels B16, D2, D6, D10, E9, F3, H7, H8 and J7). Had the Council done so, the North Slyfield Site would have been found to be suitable for removal from the Green Belt and employment allocation via the application of the GBCS methodology for assessing:

- Stage 2: the degree to which the land contributes to the purposes for the Green Belt (see below).
- Stage 3: the sustainability credentials of the land.
- Stage 4: the environmental capacity of the land to accommodate appropriate development.

NLP's Planning Assessment submitted to the Council on 29 November 2013 reviews the North Slyfield Site and concludes that it performs well against these stages⁷.

The Planning Assessment also provides a more detailed review of the North Slyfield Site's development against the NPPF's five purposes of Green Belt land and finds that it complies. In summary:

- 1 Jacobs Well and Guildford would remain **physically and visually separate**; and there would be no reduction in the existing minimum separation distance between them.
- 2 Development could be contained behind existing substantial boundary planting which, with limited enhancements, would **screen new development in public views and maintain the visual gap**.
- 3 Defensible boundaries prevent any further northward expansion of SIE and **safeguard the countryside** from further encroachment.
- 4 No impact on the character and appearance or setting of a historic town or conservation area.

⁵ Green Belt and Countryside Study, Vol II: Achieving the Purposes of Green Belt Designation table page 22

⁶ Green Belt and Countryside Study, Green Belt Purposes Sensitivity Assessment map

⁷ Nathaniel Lichfield & Partners Planning Assessment, submitted to GBC 29 November 2013, pages 25 – 27



- 5 Additional employment floorspace would assist **urban regeneration of the SIE** by strengthening its offer, role and attraction to businesses; and improve viability of SARP.

In addition, relocations of new or growing businesses on to an expanded SIE could release poorer quality brownfield sites for housing, which would **relieve Green Belt pressures elsewhere**.

The full Green Belt and landscape case is set out in NLP's Planning Assessment and Landscape and Visual Appraisal reports submitted to the Council on 29 November 2013 (Annex 3). We suggest these should be thoroughly reviewed again before the Submission Local Plan is finalised and sent to the Planning Inspectorate.

Green Belt Comparisons

The GBCS reviews land parcels against four of the NPPF Green Belt purposes and scores them. The following table extracts the GBCS scores and commentaries for the large LP B3 (within which the North Slyfield Site sits) and also those for Wisley Airfield (LP C18) and Garlick's Arch (LP B14). LP B3 gets a high score of 4; however, the North Slyfield Site within it scores lower than any of the LPs and should be prioritised because it performs better than the other sites in terms of the purposes of the Green Belt (as well as being in a location where there is existing demand and a need to expand the strategic employment site at SIE).

Land Parcel / Site	Purpose 1 To check the unrestricted sprawl of large built up areas	Purpose 2 To prevent neighbouring towns from merging into one another	Purpose 3 To assist in safeguarding the countryside from encroachment	Purpose 4 To preserve the setting and special character of towns	Overall Score
The North Slyfield Site	Checks northward sprawl of SIE	Does not prevent neighbouring settlements from merging	Defensible boundaries prevent any further encroachment into countryside	Does not preserve the setting and special character of an historic town	1
B3⁸	Checks northward sprawl of Guildford and eastward sprawl of Jacobs Well	Prevents Guildford and Jacobs Well from merging	Assists in safeguarding the countryside from encroachment by development on Clay Lane and Jacobs Well Road	Preserves setting of River Wey conservation area	4
C18⁹	Does not check sprawl of built up	Does not prevent neighbouring settlements from	Assists in safeguarding the countryside from	Preserves the setting of Ockham	2

⁸ B3 includes The North Slyfield Site

⁹ C18 includes former Wisley Airfield



	area	merging	encroachment	Conservation Area	
B14¹⁰	Checks south eastern sprawl from Send Marsh / Burntcommon	Prevents neighbouring settlements from merging	Assists in safeguarding the countryside from encroachment	Does not preserve the setting and special character of an historic town	3

Colours denote Green belt Sensitivity – Red = high; yellow = medium; green = low

The GBCS study methodology is not robust when applied to the assessment of the North Slyfield Site. As noted above, in the GBCS LP B3 gets a high score of 4. However, we consider that this is erroneous. It should not receive a point for NPPF Green Belt purpose 4 – which is *“to preserve the setting and special character of historic towns”*. The fundamental purpose of Green Belt policy is to prevent **urban sprawl** by keeping land permanently open. However, the GBCS gives LP B3 one point because it *“preserves setting of River Wey conservation area”*, which is not a historic town. This is wrong and LP B3 should score no more than 3 points, the same as LP B14 within which the allocated Garlick’s Arch site sits. This erroneous methodology undermines the Local Plan evidence base and is another factor contributing to the employment allocations within the Proposed Submission Local Plan being unsound.

Removal of the North Slyfield Site from the Green Belt would not harm the Green Belt, landscape quality or views and should be included in the Submission Local Plan consistent with national policies for the Green Belt as well as economic growth.

6. The North Slyfield Site is preferable compared to the employment allocations in the Proposed Submission Local Plan

The draft Proposed Submission Local Plan allocations for industrial / storage uses set out a number of considerations for each site, and these are directly quoted from the Plan in the table below. From this, it is clear that the North Slyfield Site has fewer constraints on development (and is therefore more deliverable) than the Submission Local Plan allocations. Please also note, as set out above, that the North Slyfield Site would be much more attractive to the market because it adjoins the existing premier industrial estate in Guildford and therefore benefits from existing infrastructure, business linkages and economies of scale.

¹⁰ B14 includes Garlick’s Arch, Send Marsh / Burnt Common and Ripley



North Slyfield Ste (formerly allocated Site 63 ¹¹)	Former Wisley Airfield (Site A35) ¹²	Garlick's Arch (Site 43) ¹³
<p><i>“Considerations:</i></p> <ul style="list-style-type: none"> • <i>Currently Green Belt</i> • <i>Greenfield site</i> • <i>Flood zone 1 (low risk)</i> • <i>Within 400m to 5km of the Thames Basin Heaths SPA, where the impact of development can be avoided</i> • <i>Adjacent to employment site”</i> 	<p><i>“Considerations:</i></p> <ul style="list-style-type: none"> • <i>Partially previously developed land¹⁴</i> • <i>Flood risk</i> • <i>Part of the site is designated as a Site of Nature Conservation Importance (SNCI)</i> • <i>The site includes a Ockham VHF Omni-directional Range ‘VOR’ and Distance Measuring Equipment ‘DME’ Navigational Beacon</i> • <i>Setting of listed building on boundary of site</i> • <i>Setting of Conservation Area on views</i> • <i>Transport and access</i> • <i>16.98ha in the north west corner of the site is allocated for waste use in Surrey Waste Plan 2008, and has an existing planning permission for an in vessel composter with associated highways and other improvements, although the Plan recognises that not all of this area would be needed.</i> • <i>Potential noise and air quality issues”</i> 	<p><i>“Considerations:</i></p> <ul style="list-style-type: none"> • <i>Location of employment uses and housing within the site</i> • <i>Flood risk</i> • <i>Tree Preservation Order</i> • <i>Ancient woodland</i> • <i>Policy A43a (which relates to land for new A3 slip roads)”</i>

¹¹ Site allocation 63: Draft Local Plan, July 2014 consultation version

¹² Site allocation A35: Submission Local Plan, June 2016 version

¹³ Site Allocation A43: Submission Local Plan, June 2016 version

¹⁴ An airfield runway; there are no existing buildings or other structures above ground level.



There are also a number of other reasons why the North Slyfield Site is a better option for additional employment floorspace and should be prioritised, with the allocation reinstated. The full case for prioritising the North Slyfield Site can be summarised as follows:

SARP

- 1 The North Slyfield Site could meet the needs of a full range of Class B1c, B2 and B8 operators whereas the employment allocation at SARP is for Class B1c light industrial only.
- 2 The undeveloped parts of SARP share landscape characteristics with the North Slyfield Site and qualitatively there is little difference between them. However, SARP is closer to the River Wey and sensitive landscape and nature designations, and could therefore be said to be more sensitive.
- 3 The North Slyfield Site could be delivered now and within a five year time frame¹⁵. While SARP is a good option for additional light industrial floorspace, relocation of the sewage treatment plant and County depot and viability issues has hindered the scheme to date.
- 4 Employment allocation of the North Slyfield Site could help unlock SARP by relocating some of the existing or proposed light industrial uses at SARP to the extended SIE. This would allow more housing to be delivered at SARP and boost development value. In addition, the growth of SIE through this allocation would reinforce the case for bringing forward the proposed Clay Lane Link Road – another important Council aspiration.

Wisley Airfield, Ockham

This mixed-use allocation includes approximately 2,500 sq.m of B2 (industrial) and B8 (warehouse) floorspace, requiring 0.7 ha of land to build out.

- 1 The North Slyfield Site benefits from existing commercial infrastructure, linkages to other businesses and economies of scale; the small employment allocation at Wisley would not, and could not meet the needs of existing businesses wishing to expand or relocate within the urban area or to Guildford's premier industrial location.
- 2 The North Slyfield Site is unconstrained by built and natural heritage and environmental constraints, unlike Wisley.
- 3 The North Slyfield Site benefits from existing natural boundary screening which would lessen the impacts of built development on the Green Belt / surrounding countryside; Wisley has no screening.
- 4 The North Slyfield Site is currently unused scrub; much of the Wisley allocation is currently farmed.
- 5 The North Slyfield Site could be delivered now and within a five year timeframe; there are question marks over the delivery of Wisley and a mixed use scheme was recently refused planning permission by the Council.

¹⁵ NPPF footnote No. 11 confirms that *"To be deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site **within five years** and in particular that development of the site is viable"* (our emphasis).



© Google. Wisley Airfield – a predominately greenfield site with no existing buildings or boundary screening and with a number of natural and built environment constraints. Not to scale.

Garlick's Arch, Send Marsh / Burntcommon

This mixed-use allocation includes approximately 7,000 sq.m of B1(c) (light industrial), B2 (industrial) and B8 (warehouse) floorspace, requiring 1.75 ha of land to build out.

- 1 The North Slyfield Site benefits from existing commercial infrastructure, linkages to other businesses and economies of scale; the employment allocation at Garlick's Arch could not meet the needs of existing businesses wishing to expand or relocate to Guildford's premier industrial location or within the urban area.
- 2 The North Slyfield Site is set some distance from the houses on Jacobs Well Road and the existing boundary planting would attenuate noise; Burnt Oak is much closer to the residential properties to the north west of Burntcommon Lane and Portsmouth Road (B2215), and to the north east of Kiln Lane.
- 3 The North Slyfield Site is currently unused scrub; much of the Garlick's Arch land is currently farmed.



© Google. Land around Garlick's Arch – a greenfield site. Not to scale.

Again, the failure to allocate employment land “in the right place and at the right time” (as required by the NPPF) means that the Proposed Submission Local Plan has not been positively prepared, is ineffective and therefore unsound in this respect.

7. The allocation of the North Slyfield Site for employment purposes did not arouse a significant degree of opposition from the general public or other stakeholders

In response to the July 2014 draft Local Plan consultation, the Council received a very small number of representations in respect of removing the North Slyfield Site from the Green Belt and allocating it for employment purposes.

Ten responses either supported the allocation or did not object. Notably, this included support from the Guildford Society which backed the allocation particularly to accommodate displaced businesses in the town centre / at housing allocations.

Only 23 of the 20,000+ comments received by the Council raised concerns or objected to the North Slyfield Site (0.1 % of all responses). There is therefore not a significant degree of local opposition to the North Slyfield Site's removal from the Green Belt and employment allocation.

The key issues raised by respondents related principally to issues that have been addressed by NLP (on behalf of our client) in its original 29 November 2013 representations and which were found to be acceptable, at the time, by the Council in preparing the draft Local Plan (i.e. loss of



Green Belt and the visual impacts of industrial development). Other matters including traffic, flood risk, noise and pollution impacts are capable of mitigation, would not have significant adverse impacts and would not outweigh the considerable economic and employment benefits. Importantly, these are development management matters which it would be appropriate to consider at the planning application stage.

Our letter (Annex 6) responding to the representations that were received contains further details.

Conclusions

The Proposed Submission Local Plan is unsound because it fails to positively and pro-actively plan for economic growth in the right place and at the right time as required by the NPPF:

- 1 The Plan fails to allocate a sufficient **quantity** of land in the Borough to meet demand and the need for employment floorspace, particularly for industrial and storage premises because the ELNA (2015) is 1) over-reliant on historic trends to estimate future requirements and 2) has limited consideration to local business and market conditions to inform the future requirements. These limitations reduce the soundness of the forecast requirements for industrial and storage land, and the actual amount of land that should be planned for should be higher than the currently proposed requirement. The failure to positively prepare to provide adequate employment land is also unsound because it is inconsistent with NPPF national policies to build a strong and competitive economy, and pro-actively meet the development needs of Guildford.
- 2 Qualitatively, the Plan fails to positively plan for additional employment land at SIE (a strategic employment site) to ensure that the premier industrial location in the Borough does not miss prospects to attract new businesses and retain existing, growing businesses. The ELNA itself highlights demand for businesses to locate to SIE, which currently has as little as 185sq.m of vacant industrial space, and limited prospects for intensification or additional space at the site. The North Slyfield Site is the only option available to expand industrial and warehousing at SIE and to plan for economic growth at the strategic location in the Borough where there is most demand.
- 3 Further, the North Slyfield Site is the only location that can support the industrial market in the Guildford Urban Area, and it is far more likely to be delivered than the proposed allocations at Wisley Airfield and Garlick's Arch (which cannot draw on the market value of an established strategic industrial location).
- 4 Allocation of the North Slyfield Site would also have other benefits for Guildford Borough:
 - i Providing land for displaced businesses could support the release of previously developed employment sites in the town centre for housing development in accordance with the Guildford Town Centre Vision.
 - ii Supporting housing delivery on urban brownfield sites would help ease pressure on the release of Green Belt land.
 - iii An allocation at the North Slyfield Site could also help to unlock the stalled SARP scheme by relocating some of the existing or proposed industrial / storage / light industrial uses at SARP to SIE, which would allow a greater proportion of housing to be developed at SARP and boost the potential development value of the project.



The failure to take such benefits into consideration also indicates that the Proposed Submission Local Plan has not been positively prepared, is inconsistent with national policies and is, therefore, unsound.

- 5 In addition to the strong economic / employment arguments in favour of allocating the North Slyfield Site for employment purposes, it is equally important to recognise that the North Slyfield Site is not a sensitive part of the Green Belt. Its release from the Green Belt for development would satisfy all five purposes of the Green Belt and there is no reason for the Council to depart from its original acceptance of this finding. Furthermore, Wisley Airfield and Garlick's Arch are more sensitive in landscape, heritage and habitat terms.
- 6 The other sites also have a number of constraints meaning that employment floorspace would be unlikely to be delivered within the short term (i.e. over the next five years). In contrast, the North Slyfield Site is readily available for development, with co-operative landowners and good quality infrastructure supporting delivery. It is also in a location that would be more attractive to the market and meeting demand. The risk profile associated with the North Slyfield Site is therefore low.
- 7 Finally, the allocation of the North Slyfield Site for employment purposes did not arouse a significant degree of opposition from the general public or other stakeholders.

For these reasons, the 4ha North Slyfield Site should be removed from the Green Belt and be allocated in the Guildford Local Plan for employment development within Classes B1c, B2 and B8. We urge the Council to reinstate the employment allocation for the North Slyfield Site in the Submission Local Plan that will be sent to the Planning Inspectorate for examination.

Please contact me or Sam Bellamy if you wish to discuss any of the matters we have addressed.

Yours faithfully

A handwritten signature in blue ink that reads 'Steven Butterworth'.

Steven Butterworth
Senior Director

Copy

Hubert Ashton -
Mr and Mrs Mostyn

Cassidy Slyfield Ltd



Nathaniel Lichfield
& Partners
Planning. Design. Economics.

Annex 1

Site Location Plan

Site Location Plan

North Slyfield Site, Slyfield Industrial Estate



1. Cassidy Slyfield Ltd

2. Mr and Mrs Mostyn



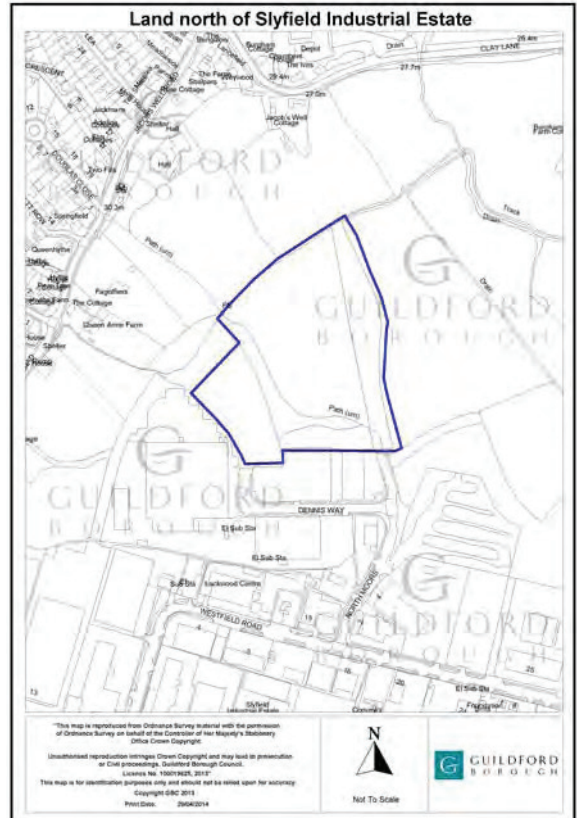
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Annex 2

Draft Local Plan, July 2014: Site Allocation 63

63	Land north of Slyfield Industrial Estate
Site address	Land north of Slyfield industrial estate, Guildford
Location	Guildford Urban Area
Ward	Stoke

Site maps



Ownership	Private
Area (size)	4 ha
Existing use	Undeveloped land
How was the site identified?	ELA
Considerations	<ul style="list-style-type: none"> • Currently Green Belt • Greenfield site • Flood zone 1 (low risk) • Within 400m to 5km of the Thames Basin Heaths SPA, where the impact of development can be avoided • Adjacent to strategic employment site

Allocation	Employment uses: Light industrial (B1c) and/or general industrial (B2) and/or storage and distribution (B8)
Timescales	1-5 years
Opportunities /commentary	The site will become part of the Slyfield Industrial Estate and as such will be part of the strategic employment site.



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Annex 3

Planning Assessment, including Landscape and
Visual Appraisal and completed Local Plan Strategy
and Sites Issues and Options Questionnaire,
Submitted November 2013



Nathaniel Lichfield
& Partners
Planning. Design. Economics.

**Guildford Borough Local Plan Strategy
and Sites Issues and Options
Consultation**

Land North of Slyfield Industrial Estate

Planning Assessment

Representations on behalf of Cassidy
Slyfield Ltd

29 November 2013

13719/SB/BH

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Executive Summary

In response to the Council's consultation on its draft Local Plan Strategy and Sites Issues and Options, Cassidy Slyfield Ltd is promoting the release of its 3.3ha land (Site 1) and the adjoining 0.7ha site (Site 2) adjacent to the Slyfield Industrial Estate from the Green Belt and their allocation for industrial and business use development.

The merits of this site promotion are presented in this Planning Assessment, prepared by Nathaniel Lichfield & Partners, having assessed the employment land needs and undertaken a Landscape and Visual Appraisal to inform an assessment of the suitability of removing the Sites from the Green Belt.

Employment Land Provision

Allocation of the Sites would meet a clear need for employment development.

There is a quantitative and qualitative need for additional Class B1, B2 and B8 Employment floorspace in Guildford Borough, to enable local businesses to relocate and provide choice for new entrants to the local market, such that the Council proposes to allocate additional land for such development by removing it from the Green Belt.

Sites 1 and 2 are well located in respect of the existing Industrial Estate and access, providing a highly suitable and attractive option for the expansion of Guildford's foremost industrial location. They would provide choice and contribute to meeting the local demand in a very sustainable strategic business location. This would, in turn, assist the growth of the local economy and local jobs within the next five years.

According to the Council's own Employment Land Assessment, no other site allocation is available in the 1-5 year period to provide additional employment land. Sites 1 and 2 can address that need in the short term and are clearly sequentially preferable to the list of potential employment sites so far identified, all of which also sit within the Green Belt.

The Sites' allocation is likely to encourage growing local businesses occupying lower quality premises to relocate, thereby releasing in some cases brownfield sites in the urban area for increased housing provision. It could also integrate with and help to unlock the delivery of the Slyfield Area Regeneration Project by relocating some of the existing uses / future employment requirements to the Sites and therefore increasing the proportion of housing delivered with the SARP boundary.

Green Belt and Visual Impact

Development of the Sites would have no impact on key views, landscape and the Green Belt.

The Sites are visually self-contained, as a consequence of the topography of the land and considerable screening provided by the existing mature tree belts on the boundaries of the Sites. Thus, they play a very limited visual role in the open character of the Green Belt between Guildford and Jacobs Well.

This existing structural landscaping provides a strong defensible boundary around the Sites, with scope for enhancement, thereby providing an appropriate permanent boundary for the Green Belt and expansion of the Industrial Estate. Indeed, development of the Sites would not impact on the landscape character of the River Wey corridor or, with limited additional planting, on views from Jacobs Well Road / Clay Lane.

Accordingly, it is concluded that the Sites are suitable for release from the Green Belt to meet the need for expansion of the Slyfield Industrial Estate (and to potentially assist with the delivery of SARP), and that such Employment development can come forward whilst maintaining the gap separating Slyfield from Jacobs Well and without having a harmful visual impact on the Green Belt.



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Appendices

- Appendix 1** Responses to Questions Raised in Local Plan Strategy and Sites Issues and Options Questionnaire and Monitoring Information form
- Appendix 2** NLP Landscape and Visual Appraisal report

Maps and Plans

- Figure 1: Site Location Plan and Context
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1.0 Introduction

- 1.1 This Planning Assessment forms the substantive part of the representations submitted by Nathaniel Lichfield & Partners (NLP) on behalf of Cassidy Slyfield Ltd, promoting their land (Site 1) at Guildford for removal from the Green Belt and to provide a northern extension to the Slyfield Industrial Estate and / or the Slyfield Area Regeneration Project (SARP).
- 1.2 Site 1 is a 3.3ha greenfield site located immediately to the north of Slyfield Industrial Estate, and which is generally well screened by trees on its boundaries, particularly to the north and east.
- 1.3 These representations also propose removing a smaller (0.7ha) adjoining green field site (Site 2) from the Green Belt as this is located between the existing Industrial Estate and Site 1 and therefore also forms a logical extension to the Estate. Site 2 is owned by Mr and Mrs Mostyn who support these Representations.
- 1.4 This Planning Assessment comprises a:
- 1 Description of the Sites (1 and 2) and their physical context (Section 2).
 - 2 Consideration of the planning context, including planning designations, SARP and the Local Plan Inquiry 2001 (Section 3).
 - 3 Consideration of the need for and suitability of the Sites for employment development as an extension to Slyfield Industrial Estate / SARP (Section 4).
 - 4 Assessment of the commercial property market in Guildford and general quantitative and qualitative need for new employment floorspace (Section 5).
 - 5 Landscape and visual appraisal of potential employment development on the Sites (Section 6).
 - 6 Consideration of the Green Belt issues (Section 7).
 - 7 Conclusions (Section 8).
- 1.5 In addition, Appendix 1, briefly addresses relevant questions raised in the Council's Questionnaire and Monitoring Information form.
- 1.6 Appendix 2 contains the detailed Landscape and Visual Appraisal report.



KEY

- Site 1 (to be removed from Green Belt)
- Site 2 (to be removed from Green Belt)
- Slyfield Area Regeneration Project (SARP)
- Existing Green Belt



Project Land North of Slyfield Industrial Estate

Title **Figure 1: Site Location Plan and Context**

Client Cassidy Slyfield Ltd

Date November 2013

Scale NTS

Drawn by SW

Drg. No IL13719/001



2.0 The Sites and Physical Context

2.1 The Sites are shown in context on Figure 1 and in more detail on Figure 2.

Site 1

2.2 Site 1 is located immediately to the north of Slyfield Industrial Estate (Figure 2). It is owned by Cassidy Slyfield Ltd.

2.3 It covers a broadly rectangular area of approximately 3.3ha comprising grass and scrub land. The northern part of the site is particularly overgrown with scrub and brambles.

2.4 The Site is at approximately 30m AOD and is generally flat. To the north of the site, land rises gently north-wards.

2.5 The Site is generally well screened by trees on the boundaries, particularly on the northern and eastern boundaries.



Photograph 1: View within Site 1 towards the Northern Boundary






Site 1 Boundaries

Northern boundary

2.6 The northern boundary is a barbed-wire fence with bushes / brambles alongside it. A footpath runs immediately to the south of the fence, there is then a small stream and then a band of fairly substantial, tall, deciduous trees. The site is well screened by these trees in views from the north.



KEY

- Site 1 
- Site 2 
- Definitive Public Footpaths 
- Roads owned by Cassidy Slyfield Ltd 
- Potential Vehicle Access 





Photograph 2: Site 1 Northern Boundary fence, path, stream and trees

Eastern Boundary

- 2.7 The eastern boundary of Site 1 is a wire fence. There is a fairly wide (30m+) and relatively dense belt of deciduous trees running inside this boundary, with a public footpath running through the middle. The interior of the Site is well screened by these trees in views from the east.



Photograph 3: Site 1 Eastern Boundary public footpath and trees

Southern Boundary

- 2.8 The southern boundary is formed by the fence to Alexander Dennis. There is a band of trees / bushes within the boundary, which currently provide some screening.



Photograph 4: Site 1 Southern boundary and Alexander Dennis units beyond

Western Boundary

2.9

The western boundary is a thin and broken wire fence with a ditch running down the side. There are some scrubby bushes on the boundary. This provides very limited screening. However, the thick band of trees to the north and adjacent to Site 2 hides this boundary in views from the north and west.



Photograph 5: Site 1 Western boundary and Site 2 and Alexander Dennis unit beyond

Site 1 Access and Public Footpaths

- 2.10 Public footpaths and access roads are shown on Figure 2.
- 2.11 There is potential to provide vehicular access by extending North Moors and Denis Way (Industrial Estate service roads) which are owned by Cassidy Slyfield Ltd) into Site 1 and Site 2 respectively (see Figure 2).
- 2.12 Access on to Site 1 by foot is via:
- Public Footpath FP438 which enters the Site approximately in the middle of the northern boundary (from the municipal field to the north); and
 - the south eastern corner of the site from Slyfield Industrial Estate.
- 2.13 Marked public footpath (FP 438) runs through the site (see Figure 2). It runs approximately north / south from the top of North Moors to the north-eastern corner of the site, where it passes over a small wooden bridge and then turns west at right angles to run across the top of the site. From about half way along the northern boundary, the footpath crosses north-west in to the adjoining municipal field and links to the Village Hall / Jacobs Well Road.

Surroundings

- 2.14 Site 1 is bounded by:
- A field used for recreation (associated with the Village Hall and owned by Guildford Borough Council) to the north-west, and a field / grassland to the north-east (also owned by Guildford Borough Council). There is a small escarpment to the north of Site 1 on a SW – NE axis;
 - Grassland / pasture to the east owned by Guildford Borough Council, beyond which is the River Wey and its tributaries.
 - Slyfield Industrial Estate to the south (a Post Office workshop / depot and Alexander Dennis staff car park).
 - The adjoining Site 2 to the west.
- 2.15 Please see Figure 3 (Surrounding Land Ownership) for further details.

Adjoining Site 2

- 2.16 The adjoining Site 2 is owned by Mr and Mrs Mostyn who support these Representations. It is approximately 0.7ha and also mainly comprises overgrown grass and scrub land. To the north of Site 2 are thick bands of relatively tall trees which screen the interior (and also Site 1) in views from the north and west.
- 2.17 It is bounded by:
- A field used for recreation (associated with the Village Hall and owned by Guildford Borough Council) to the north east;
 - Residential gardens (including the owner's) to the north-west;



KEY

- Site 1
- Site 2
- Guildford Borough Council Ownership Boundary
- Mr & Mrs Mostyn Ownership
- Alexander Dennis / Aviva AD
- Post Office / Aviva PO



- Site 1 to the east;
- Slyfield Industrial Estate to the south (Alexander Dennis staff car park); and.
- Alexander Dennis factory building to the south west.

2.18 Like Site 1, it is at approximately 30m AOD and is generally flat.

2.19 There are no public footpaths providing access to Site 2.

Flood Risk

2.20 The north eastern part of Site 1 is located within Flood Zone 2 (medium probability of flooding); the remainder of the site and all of Site 2 is in Flood Zone 1 (low probability of flooding)¹.

2.21 General industry, storage and distribution uses are defined as 'less vulnerable uses' and are appropriate in Flood Zone 2².

¹ <http://www.environment-agency.gov.uk>

² Technical Guidance to the National Planning Policy Framework, March 2012

3.0 Planning Designations and History

Planning Designations

- 3.1 In the current Guildford Borough Local Plan (2003) the Sites are located within the inner edge of the Green Belt (the southern extent of which in this location runs along the south boundary to Site 1 and the south and west boundaries of Site 2) – please see Figure 1.
- 3.2 Site 1 adjoins (and is outside) the Corridor of the River Wey to the east. The corridor (policy G11) seeks to protect and improve the visual setting, amenity, ecological and historic interest of the River Wey Corridor.
- 3.3 To the south-east of Site 1, adjoining the industrial estate and overlapping the Corridor of the River Wey designation, is an area of land designated for employment purposes (E1). This comprises the northern part of the Slyfield Area Regeneration Project (SARP) (Figure 1).
- 3.4 The River Wey is designated as a conservation area. A Site of Nature Conservation Importance (NE3) adjoins the eastern side of the allocated land proposed for the eastward extension of the Industrial Estate.

Slyfield Area Regeneration Project (SARP)

- 3.5 The SARP is a major urban regeneration scheme covering more than 40ha of land adjacent to the Slyfield Industrial Estate and residential area. Its northern extent adjoins the south east corner of Site 1 (Figure 1). Please see paragraphs 4.17 – 4.18 below for further details.

Local Plan Inquiry 2001

- 3.6 During preparation of the Local Plan (adopted in 2003), a roughly triangular shaped site located to the north of Dennis Way was promoted for employment allocation by Wildbrook Properties Ltd (on behalf of the same owners of Sites 1 and 2) as an extension to Slyfield Industrial Estate. The objection (No. 1395) to the Plan proposed that the land be added to the local employment allocation to allow the expansion of Dennis Specialist Vehicles, for “*nursery industrial units*” and for a community centre housing facilities such as a crèche to serve the estate.
- 3.7 The Local Plan Inspector considered that there was no need to take this land into the Industrial Estate, and that to do so “*could be seriously damaging to the separation between Guildford and Jacobs Well*”. If there was a future need to extend the Industrial Estate, the Inspector considered that the need and location would be first need to be identified in the Structure Plan in accordance with PPG2 (then extant)³.

³ Guildford Borough Local Plan Inquiry Inspector’s Report, September 2001, pages 124-125 and 231.

- 3.8 The Inspector considered that there were adequate employment allocations at the Industrial Estate that remained available⁴.
- 3.9 The employment allocations in Slyfield at that time comprised land immediately to the east of the site (ie. now within the SARP) and infilling of vacant land along Moorfield Road. The Moorfield Road site has been developed into a car show room site. However, the SARP land to the east of Slyfield remains undeveloped (please see paragraph 4.18 below). The allocations within the existing boundaries of the Industrial Estate have therefore been taken up since 2001.
- 3.10 The Inspector’s consideration of the Green Belt issues was as follows:
“The site is part of a belt of open land which separates the Industrial Estate from Jacobs Well. The land was no doubt at one time farmed, although now it gives the impression of being neglected. Nevertheless, a pattern of hedges remains in which there are many larger trees and the land is an effective separation between the Estate and the nearby residential area. This gap is at its narrowest at the Dennis plant and the size of its buildings and other structures do affect the impression of separation at that point. To the north, where the site occupies some half the width of the gap, while much might be done with good design and generous landscaping, if added to the encroachment already made by the development of Dennis Way, further development would result in a serious danger that the detachment of Jacobs Well from Guildford could be lost. This would be damaging to the character of Guildford and Jacobs Well and to the objectives of the Green Belt as a whole.”⁵
- 3.11 The Inspector concluded that there was no justification for recommending that the site be added to the allocations.
- 3.12 A number of circumstances have changed since that assessment, and it is necessary to undertake an up to date examination of the issues (which is provided below).
- 3.13 It is now evident that there are no remaining allocations within the Estate, and that there is a present need and demand for additional employment floorspace at Slyfield Industrial Estate, in association with SARP and generally within the Borough. The NPPF requires Green Belt boundaries to be reviewed, as part of the Local Plan adoption process, in order to potentially accommodate the objectively-assessed needs for additional housing and employment land. In the context of the Council’s review of Green Belt boundaries, the current representations address both the need for additional employment land allocations and also Green Belt impacts, and conclude that the separation between Guildford and Jacobs Well would not be lost.

⁴ Guildford Borough Local Plan Inquiry Inspector’s Report, September 2001, para 6.3.29

⁵ Guildford Borough Local Plan Inquiry Inspector’s Report, September 2001, para 6.3.30

4.0 Site Allocation and Employment Development

- 4.1 This section considers the suitability of allocating the Sites adjacent to the northern boundary of the Slyfield Industrial Estate (Slyfield) for employment development purposes. It draws upon evidence gathered from site visits and a review of Council planning documents, to consider the case for expanding the Slyfield Industrial Estate and the issues relating to the redevelopment of the Slyfield Area Regeneration Project (SARP).

Slyfield Industrial Estate

- 4.2 The Council's July 2013 Employment Land Assessment (ELA) identifies Slyfield as the foremost industrial estate in the Borough, covering a total area of 38 ha and incorporating some 18 ha of B use class floorspace. The ELA also confirms that the Estate provides around 2,100 jobs and the majority of the B2 and B8 employment floorspace in Guildford. The majority of land within the estate is in Council ownership, although some land is in the private ownership of, amongst others, Thames Water Utilities, Opus Park and Dennis Specialist Vehicles.⁶ The Estate is shown on Figures 4 and 5.
- 4.3 The conditions of the units located within the Industrial Estate are generally good, with a number of relatively new developments enhancing the Estate. Some of the more modern and attractive premises are occupied by car show rooms (eg. Lexus, Mercedes-Benz, Audi, etc.) located along Moorfield Road. The ELA identifies the absorption of old B1 and B2 use class floorspace into alternative uses (ie. car show rooms and self-storage) as an important regenerative mechanism for the Industrial Estate.⁷



Photograph 6: Mercedes-Benz and Audi car show rooms on Moorfield Road

⁶ Guildford Borough Council, Employment Land Assessment, July 2013, Appendix U3, p. 159 - 160

⁷ Guildford Borough Council, Employment Land Assessment, July 2013, Appendix U3, p. 160



Nathaniel Lichfield
& Partners
Planning, Design, Economics.

Project	Land North of Slyfield Industrial Estate
Title	Figure 4: Slyfield Industrial Estate, Current Occupiers
Client	Caasidy Slyfield Ltd
Date	November 2013
Scale	NTS
Drawn by	AH
Dwg. No	IL-13719-020



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Photograph 7: Safe Store and The Big Yellow Storage on Moorfield Road

4.4

The northern limits of the Slyfield Industrial Estate comprise greater concentrations of larger industrial premises, with a range of factory-based operations located along North Moors, Dennis Way and Westfield Road. Generally, conditions of these premises are also of decent quality despite the heavy usage of some of the sites. Notable occupiers in the northern part of the estate include Alexander Dennis, John Dennis Coachbuilders, Chambers Recycling and CEMEX.

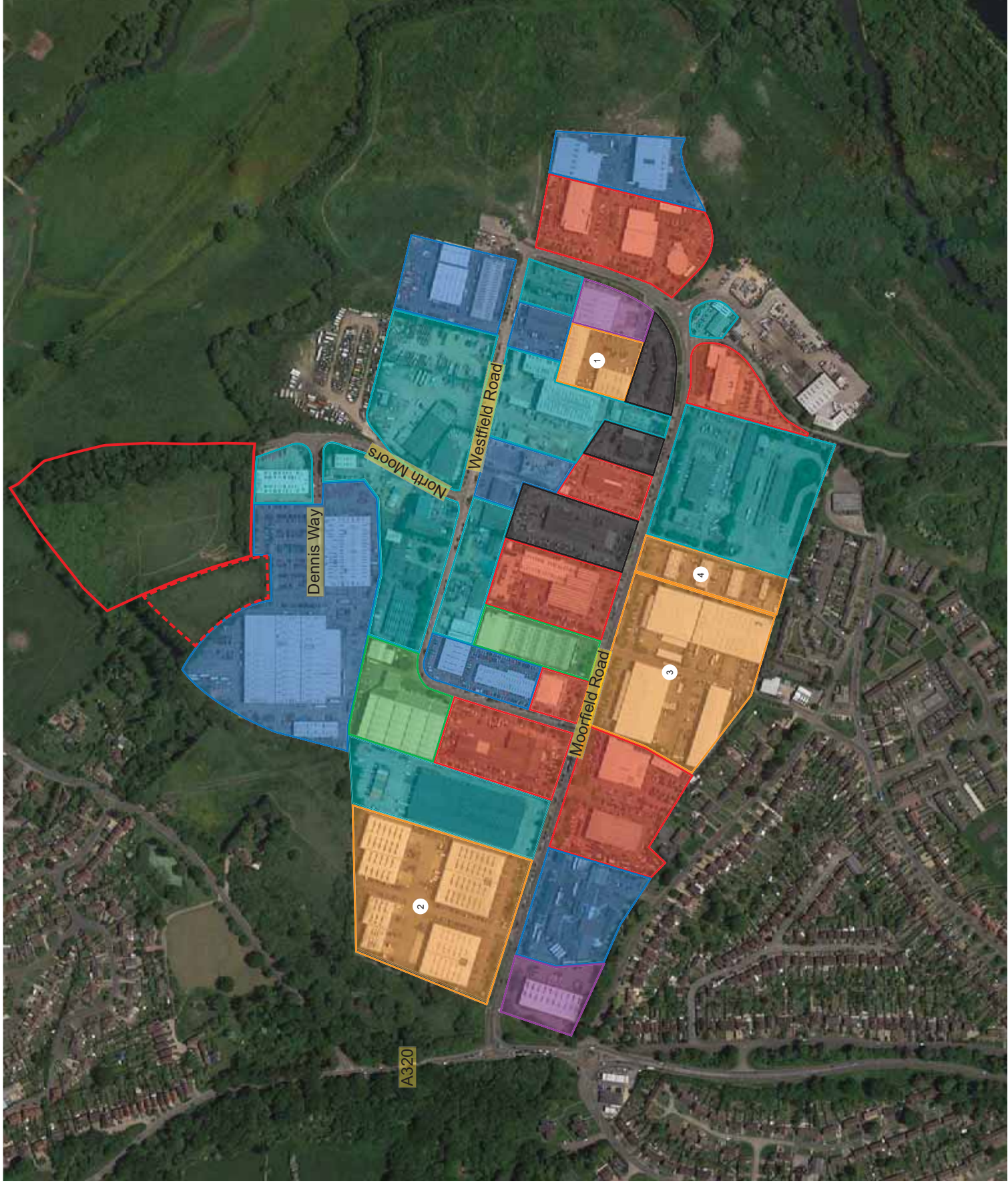


Photograph 8: Alexander Dennis Facility on Dennis Way



Photograph 9: Chambers Recycling located along Westfield Road

- KEY**
- Site 1
 - Site 2
 - Retail (A1)
 - General Industry (B2)
 - Storage & Distribution (B8)
 - Sui Generis
 - Car Show Room
 - Vacant Site
 - Business Park
 1. Moorfield Point
 2. Opus Park
 3. Cobbett Park
 4. Enterprise Park



Nathaniel Lichfield & Partners
 Planning, Design, Economics.

Project	Land North of Slyfield Industrial Estate
Title	Figure 5: Slyfield Industrial Estate, Current Uses
Client	Caesdy Slyfield Ltd
Date	November 2013
Scale	NTS
Drawn by	AH
Dwg. No	IL13719-014



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- 4.5 Slyfield Industrial Estate contains four self-contained business parks:
1. **Opus Park:** Provides several large high-grade office and industrial premises. Existing occupiers include Space Air Conditioning, Plumbing Trade Supplies and Earlex.
 2. **Cobbett Park:** Provides ten modern warehouse units of varying sizes. Existing occupiers include Big Yellow Storage, Safestore, Furniture Village and City Link.
 3. **Enterprise Park:** Provides 26 small units built in the 1970s for a range of business uses. Existing occupiers include Fastsigns, DJ Deals, Pirteck, Wicked Wheels and The Little Beer Corporation.
 4. **Moorfield Point:** Provides ten modern trade and industrial units of varying sizes. Existing occupiers include Anaheim UK, NBS Technologies, BEW Electrical, Herz Valves and SCT Mobile.
- 4.6 The location of the four business parks and an overview of uses within the Slyfield Industrial Estate at November 2013 are shown in Figure 5.
- 4.7 As a strategic employment location for the Borough, Slyfield benefits from very low vacancy rates. A site visit in November 2013 identified only six vacant sites: three large independent premises on Moorfield Road and three small units within the business parks. This represents a vacancy rate in the Estate of around 6% (i.e. 6 out of 102 premises were vacant). The three larger premises were of older stock and average condition, and could be expected to be upgraded over time. Most of the vacant sites were being marketed, with letting boards placed on-site, although two units gave no obvious indication of being on the market.
- 4.8 It is not uncommon for a naturally functioning property market to experience some level of availability, even in more vibrant property markets, as vacancies constantly arise from the turnover of business occupiers. The Industrial and Logistics Market 2013 report indicated that availability of industrial space in the Borough had decreased to around 21,000 sq.m at the end of 2012, which represented an availability rate of 8.4%.⁸ Lower availability rates in Slyfield compared with the wider Borough indicates that a good level of demand exists in the industrial estate.
- 4.9 Slyfield is surrounded by open Green Belt land to the north and east. To the south-west and west of the estate are the residential neighbourhoods of Slyfield Bellfields, which mostly comprise housing of 1950s and 1960s stock.
- 4.10 Access to the site is from the A320 Woking Road, which provides good links to Woking and Guildford. The A320 also connects the site with the M25 and A3.

⁸ Lambert Smith Hampton, Industrial & Logistics Market, 2013, p. 16

Demand for Space in the Slyfield Industrial Estate

- 4.11 As the foremost industrial site in the Borough, Slyfield benefits from good levels of business demand and activity, high-quality infrastructure within the site, and reasonable connections to other parts of the local economy and sub-region. In particular, the prevailing condition of the estate with a number of modern units and low vacancies indicates that demand for space in the estate remains high.
- 4.12 In a 2008 business survey (undertaken for the Guildford Economic Development Study and published in 2009), need was identified for a suitable supply of small and medium sized industrial units within the market. Currently, Slyfield offers a number of important sites for smaller businesses seeking such premises in the Borough, including Enterprise Park and the ‘starter units’ located along Westfield Road (Figure 4). These sites have seen strong levels of demand in recent periods and play an important role in supporting business formation in the area.⁹
- 4.13 However there is also a significant need to provide space for younger businesses to expand their operations in the Borough. The Site Assessment Working Partnership (reported in the ELR) recognised that additional employment space within Slyfield would better accommodate the growth potential of local businesses, particularly for those wanting to remain within the estate or local economy.¹⁰ The space requirements of expanding businesses will vary by size and type depending on their operations, so the supply of business premises in Slyfield also needs to remain flexible.
- 4.14 Guildford Borough Council also recognises that a shortage of employment land in the market has been a key factor that has limited the growth of related sectors.¹¹ The Council highlights that opportunities exist for the redevelopment of Slyfield to accommodate additional employment land in the local area, which will encourage businesses to relocate to the Industrial Estate. The Council notes that the relocation of businesses to Slyfield could potentially release land within the urban areas of Guildford, which could then be replaced by new housing.¹²
- 4.15 Evidence from the ELA indicates that pressure exists on the supply of space within the Slyfield Industrial Estate and that available employment land within the Estate does not entirely meet the identified need.¹³ It is apparent that a shortage of commercial premises exists for a range of business types, from starter businesses looking for small to medium sized units to growing businesses looking to grow their operations.¹⁴

⁹ Guildford Borough Council, Employment Land Assessment, July 2013, Appendix U3, p. 160

¹⁰ Guildford Borough Council, Employment Land Assessment, July 2013, Appendix U3, p. 160

¹¹ Guildford Borough Council, Clay Lane Link Road Submission, 2013, available at <http://www.enterprisem3.org.uk/public-works-loan-board/>

¹² Guildford Borough Council, Clay Lane Link Road Submission, 2013, available at <http://www.enterprisem3.org.uk/public-works-loan-board/>

¹³ Guildford Borough Council, Employment Land Assessment, July 2013, Appendix U3, p. 160

¹⁴ University of Surrey, Guildford Economic Development Study, July 2009, p. 67

- 4.16 As the foremost industrial site for businesses in Guildford, Slyfield provides an established market location that can support additional employment capacity. The Site Assessment Working Partnership recommends that Slyfield is critical for maintaining industrial employment in the Borough, and that where industrial sites are lost elsewhere in Guildford, Slyfield should develop the capacity to replace such land through expansion.¹⁵

Slyfield Area Regeneration Project (SARP)

- 4.17 The Slyfield Area Regeneration Project (SARP) is a major mixed-use scheme that will provide over 40 ha of redeveloped land for housing, employment and retail. The site is located adjacent to the east of the Industrial Estate and residential areas of Slyfield and Bellfields, and is entirely owned by the Guildford Borough Council (Figure 1). Key features of the regeneration scheme include:
- Relocation of the Thames Water sewage treatment works from its current location at the southern limits of the site to an 11 ha civic amenity site at the northern limits;
 - Delivery of at least 1,000 additional homes and a new village centre containing around 1,860 sq.m of retail use on the released land in the southern part of the site;
 - Space for employment development including a site for the Surrey County Council's waste facilities, Guildford Depot and a range of other industrial uses; and
 - It is also intended that SARP would deliver the Clay Lane Link road to Moorfield Road, which *"will facilitate further economic growth at the adjoining Slyfield Industrial Estate given the current congestion on the A320"*.¹⁶
- 4.18 In August 2011 the timescales for the project had been pushed back in order to undertake a more detailed assessment of the financial viability of the scheme (and particularly the cost of the replacement Thames Water sewage treatment works).¹⁷ However, the Council indicated that discussions with Thames Water had resumed as at May 2013 and that the regulatory body Ofwat would be engaged for approval of the regeneration scheme in 2014.¹⁸ The Council's recently-published Corporate Plan (2013 – 2016) restates its commitment to SARP and as a priority *"work with partners and key stakeholders to regenerate Slyfield area ... and support the increase of employment generating opportunities and enterprise"* [page 7].

¹⁵ Guildford Borough Council, Employment Land Assessment, July 2013, Appendix U3

¹⁶ Local Plan Strategy and Sites Issues and Options, Information Sheet No. 19

¹⁷ SARP Progress Update, Guildford Borough Customer and Community Scrutiny Committee, 30 August 2011

¹⁸ Customer and Community Scrutiny Committee Report, Annual Report by the Leader of Guildford Borough Council May 2012 - April 2013, May 2013,

SARP Effect on Slyfield Industrial Estate

- 4.19 Redevelopment of the SARP site to the east of Slyfield Industrial Estate is of importance when considering the extension of the estate to the north as the overall structure and capacity of the local area will be transformed. The SARP project plans to provide some additional employment land within the site that may affect the availability of developable land in the market. However much of this land will be taken up by the civic amenity facility on the northern part of SARP, leaving a limited amount of land for other employment uses elsewhere on the regenerated site.
- 4.20 In addition, the proposed construction of the Clay Lane Link road to Moorfield Road will provide much better access to Slyfield Industrial Estate. The existing single road access to the Estate was identified by one large business occupier as a major barrier to further growth for businesses located within the site.¹⁹ A secondary access point to the north east of the Industrial Estate site, developed as part of the SARP project, would facilitate greater levels of growth in the adjoining Slyfield Estate. Improvements to traffic flows would support expansion of the existing business base in the area and would contribute to the performance of the local economy.

Summary

- 4.21 The allocation of the Sites located immediately to the north of the Slyfield Industrial Estate for employment development has the potential to contribute to the growth of the local industrial market and wider economy in Guildford. The following key points summarise the economic issues relating to the expansion of the Slyfield Industrial Estate to the north:
- The ELA identifies Slyfield as the foremost industrial estate in the Borough, providing the most industrial floorspace, high quality premises and 2,100 jobs within Guildford;
 - The Estate is in an accessible location with good links to the A3 and M25.
 - Recent developments have helped enhance the Estate and regenerate Slyfield, with a concentration of car show rooms and self-storage facilities now located in the area.
 - As a strategic employment location, the Estate benefits from high levels of demand for premises, and low vacancy rates (that are limited to mostly older stock of average condition that will be redeveloped over time).
 - Greater demand exists for small and medium sized industrial units, and for premises into which growing businesses can expand.

¹⁹ Guildford Borough Council, Economic Strategy 2013 - 2031, June 2013, p. 15

- Evidence suggests that a shortfall of available land exists in Slyfield that supports the activities of a range of business units, consequently limiting the growth of such local businesses.
- Further expansion of the estate would better accommodate demand for industrial and warehousing premises in the local area.
- Additional employment land at the estate could release brownfield sites in the Borough for increased housing provision.
- Redevelopment of SARP will facilitate further economic growth in Slyfield as greater access to the estate will be gained from the Clay Lane Link road.

5.0 Employment Land Provision in Guildford

- 5.1 This section provides an assessment of the employment land issues related to the proposed northern extension of the Slyfield Industrial Estate by considering the existing conditions of the local commercial property market and balance of employment land within Guildford.
- 5.2 The recently published Corporate Plan (2013 – 2016) confirms that it is the Council’s priority to “*support and engage with businesses by increasing the availability of commercial space required for them to grow...*” [page 7].

The Local Commercial Property Market

- 5.3 Recent growth in the Borough has largely been the result of new businesses entering the market to take-up floorspace in newly constructed premises. However nearly all of this business growth has been in the office and warehouse markets with limited development of new industrial units in recent periods. In fact the amount of industrial units available in Guildford over the last decade has declined, which has restricted the growth potential of the market.²⁰
- 5.4 In 2008, a survey of local businesses highlighted the need for a greater supply of sites for employment purposes in the Borough as more than half of all businesses expected an increase in their floorspace requirements in the future that could not be met at their existing location.²¹ The majority of these businesses also indicated that they would prefer to remain within their existing estate or in another estate within the Borough if required to move. This key issue highlights the need to provide better relocation availability of premises within the local commercial property market.
- 5.5 The National Industrial and Distribution Report (2012) produced by Lambert Smith Hampton indicates a shortage of available employment land as a major factor limiting the amount of new B2 and B8 development in the Borough. This has seemingly led to a mismatch between the demand for high-grade premises and the supply of mostly older second hand stock in the local property market. At the time the report was prepared by Lambert Smith Hampton, about 23,000 sq.m of B2 and B8 space was available in Guildford and 20,000 sq.m of new B1 / B2 / B8 floorspace was in the pipeline for development at Henley Business Park.²²
- 5.6 The dominance of offices in the commercial property market has resulted in a reduced amount of available land for industrial premises to be built in Guildford. Whilst the balance of the local property market will largely depend on structural changes in the economy (ie. industrial and employment changes), the availability of land for certain employment developments will also facilitate

²⁰ Guildford Borough Council, Employment Land Assessment, July 2013, Appendix B, p. 80 - 86

²¹ University of Surrey, Guildford Economic Development Study, July 2009, p. 67

²² Lambert Smith Hampton, National Industrial & Distribution Market 2012, February 2012, p. 17

this change towards the more dominant use. Limited supply of employment land for B2 and B8 developments in Guildford over the last decade has to some degree reduced the amount of modern premises that now exist for such purposes.

- 5.7 Without greater availability of employment space in the local economy, existing businesses will inevitably relocate outside the Borough as they expand and new starter businesses will struggle to establish themselves in the local market. In order to meet future employment needs, the ELA proposes the intensification and redevelopment of existing employment sites in the short term²³ (eg. Middleton Industrial Estate) and expansion into the sites suggested for development in the Green Belt and Countryside Study (GBCS) in the medium to long term (see Table 5.3 below).²⁴

Employment Land Assessment

- 5.8 The ELA projections for the Borough indicate total job growth of approximately 12,400 jobs over the period between 2006 and 2031 [page 28]. This projection of job growth was converted into a requirement for B Class floorspace of between 10.5 ha and 20 ha over the plan period 2013 to 2031 (see Table 5.1).

Table 5.1 Forecast Demand for Employment Land in Guildford 2013 - 2031

	Lower Range (ha)	Upper Range (ha)
Offices (B1)	6.5	11
Industry (B2)	0	2
Warehousing (B8)	4	7
TOTAL	10.5	20

Source: ELA, 2013, p. 54

- 5.9 In order to meet the identified need for employment land in the Borough, the ELA considers additional floorspace could be generated from:
1. Vacant floorspace in the Borough coming back into productive use;
 2. Extant planning permissions for employment purposes being developed; and
 3. Redevelopment or intensification of employment sites across the Borough [page 62].
- 5.10 While forecasts indicate that if all three sources of employment floorspace were maximised, the lower baseline requirements for both B1 and B2 space could be achieved, in reality it is highly unlikely that this supply would come forward in its entirety over the short term. This is largely due to a natural level of availability existing in most functioning property markets and the current economic climate reducing the likelihood of large unimplemented planning

²³ Guildford Borough Council, Employment Land Assessment, July 2013, p. 60

²⁴ Guildford Borough Council, Employment Land Assessment, July 2013, p. 65

permissions advancing without a pre-let contract (eg. Guildford Plaza and Henley Business Park)²⁵.

- 5.11 The ELA provides a more realistic projection of employment land supply for the Borough, as shown in Table 5.2. The figures indicate that the amount of employment floorspace needed in Guildford to even meet the lower baseline requirement for the period 2013 to 2031 will not be achieved solely through redevelopment and intensification of existing employment sites.

Table 5.2 Realistic Supply of Employment Land (ha) in Guildford without Land Release 2013 - 2031

		Offices (B1)	Industry (B2)	Warehousing (B8)	Total
Baseline Requirements	Lower	6.5	0	4	10.5
	Higher	11	2	7	20
Vacant Floorspace (ha)		2.70	0.60	0.48	3.78
Unimplemented Permissions (ha)		- 0.16	- 0.04	1.65	1.45
Intensification (ha)		1.90	0.30	-	2.20
TOTAL		4.44	0.86	2.13	7.43
SURPLUS/SHORTFALL		- 2.06 to - 6.56	0.86 to - 1.14	- 1.87 to - 4.87	- 3.07 to - 12.57

Source: ELA, 2013, p. 63

- 5.12 In order to meet the need for employment land in the Borough, the GBCS has identified eight potential areas in the Borough that could be used for employment development purposes over the plan period to 2031²⁶. If these potential sites were brought forward for employment development, the ELA forecasts between 16.2 ha and 22 ha of additional employment floorspace could be provided over the medium to long term (see Table 5.3), but nothing in the next five years.

²⁵ Guildford Borough Council, Employment Land Assessment, July 2013, p. 63

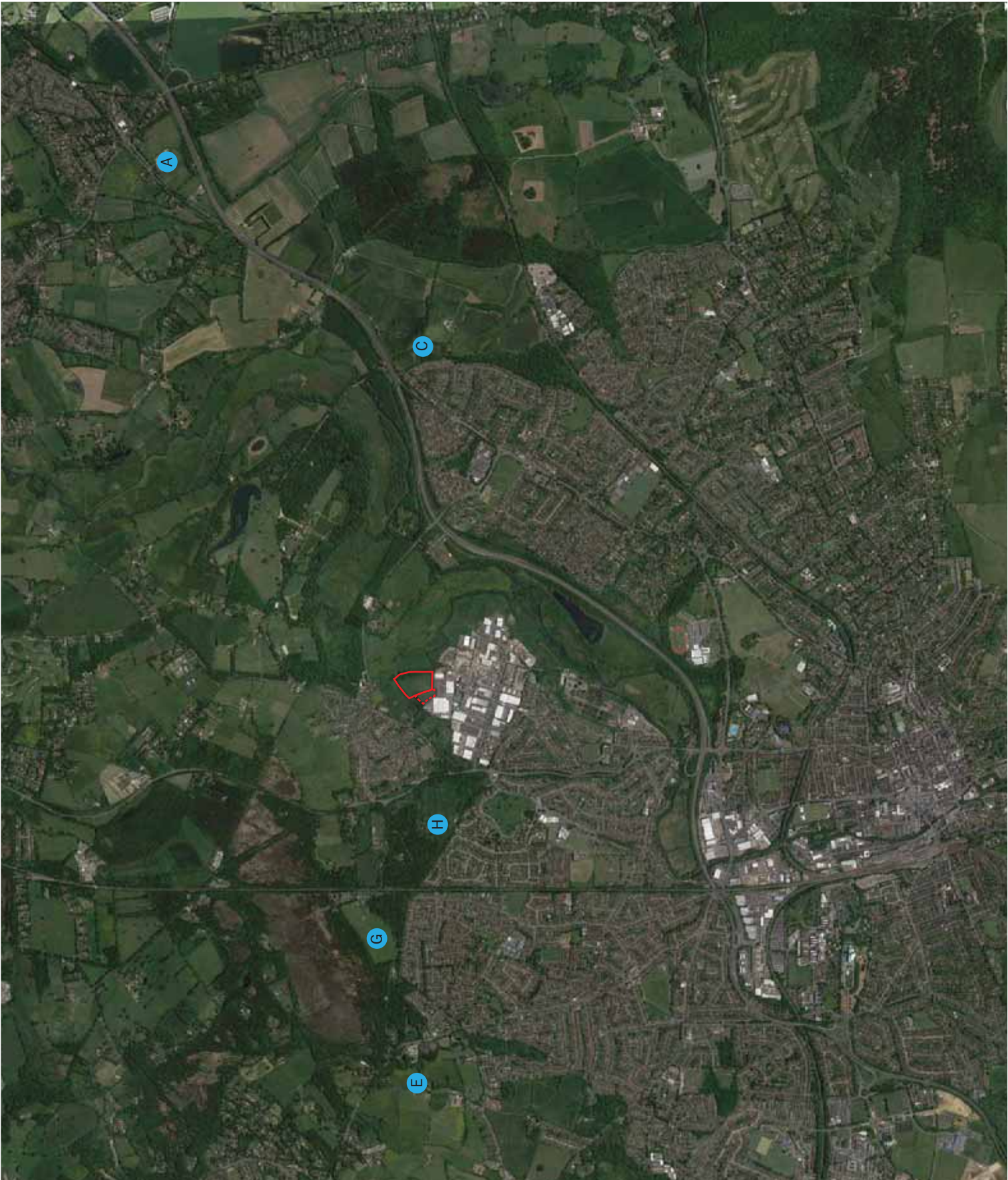
²⁶ Guildford Borough Council, Employment Land Assessment, July 2013, p. 66 - 67

Table 5.3 Potential Development Areas for Employment Use in Guildford 2013 - 2031

	Site Name	Potential Uses	Average Potential Floorspace Provision (ha)	Deliverability (years)
A	Burnt Common Warehouse, London Rd, Send	B1c, B2, B8	2.1 - 4.2	6 - 10
B	Grange Farm, Grange Rd, Tongham	B1c, B2, B8	3.7 - 7.4	6 - 10
C	Gosden Hill Farm, Merrow Lane, Guildford	B1a, B1b, B1c	2.44	6 - 10
D	Blackwell Farm, Hogs Back, Guildford	B1a, B1b, B1c	2.81	6 - 10
E	Tangley Place Farm, Tangley Lane, Worplesdon	Park & Ride, B1c, B2	-	11 - 15
F	Peasmarsh Industrial Estate, Old Portsmouth Road, Peasmarsh	B1c, B8, Sui Generis	1.05	11 - 15
G	Salt Box Road, Whitmoor Common	B1c, B2	2.71	11 - 15
H	Gunners Farm & Bullens Hill Farm, Salt Box Road, Jacobs Well	B1c, B2, B8	1.4	11 - 15
TOTAL POTENTIAL FLOORSPACE (ha)			16.2 - 22.0	

Source: Employment Land Assessment, 2013, p. 66

- 5.13 The potential floorspace provided by developing each site was calculated in the ELA by multiplying the available land area with a standard plot ratio. A plot ratio takes into consideration the employment use class, open space and parking on a site to calculate how much of the land might be developed for employment purposes. The plot ratios used in the ELA are ^[25]:
- Offices (B1): 0.275
 - General Industry (B2): 0.42
 - Warehousing (B8): 0.5
- 5.14 Development of the eight potential sites in the Borough would offer a surplus of between 13.1 ha and 18.9 ha of the lower baseline shortfall of 3.07 ha, and a surplus of between 3.6 ha and 9.4 ha of the upper baseline shortfall of 12.57 ha (see Tables 5.2 and 5.3). Five of the potential development sites are located relatively close to Slyfield and are shown in Figure 6.
- 5.15 However the identification of potential sites for employment development within the Borough does not ensure their future development. The ELA recognises that much of this land is held privately and is out of the direct control of the Council, limiting its ability to bring the land forward for employment development [page 69].
- 5.16 In addition, the deliverability forecasts for each of the sites indicate that they would not be brought forward in the short term, but have longer timescales of between six and 15 years. This highlights that a shortfall of employment land will remain in the short term, limiting the choice of sites for existing



KEY

Site 1



Site 2



GBCS Potential Employment Sites

- A: Burnt Common Warehouse, London Road, Send
- C: Gosden Hill Farm, Merrow Lane, Guildford
- E: Tangley Place Farm, Langley Lane, Worplesdown
- G: Salt Box Road, Whitmoor Common, Jacobs Well
- H: Gunners Farm and Bullens Hill Farm, Salt Box Road, Jacobs Well



Nathaniel Lichfield & Partners
 Planning, Design, Economics.

Project	Land North of Slyfield Industrial Estate
Title	Figure 6: GBCS Potential Employment Sites in Proximity to Slyfield Industrial Estate
Client	Cassidy Slyfield Ltd
Date	November 2013
Scale	NTS
Drawn by	AH
Dwg. No	IL13719-016



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 CL13719

businesses within the next five years. In contrast, Sites 1 and 2 could be brought forward for development immediately, subject to removal from the Green Belt and employment allocation.

- 5.17 Overall, the ELA suggests that the supply of available land and vacancy rates within the Borough need to be consistently monitored to ensure that adequate land supply is achieved for local businesses in both the short and long term. Sites 1 and 2, located to the north of Slyfield Industrial Estate, provide an excellent opportunity to develop one or two parcels of land in the short term that would alleviate some of the pressures for additional premises in the local commercial property market.

Summary

- 5.18 This section has provided a review of the employment land context in Guildford. The following issues characterise the commercial property market and balance of employment land in the Borough:

- Specialisation in commercial office floorspace in Guildford has reduced the amount of available floorspace over the last decade. A lack of employment land for industrial development in particular has meant fewer modern units exist for these employment purposes in the local property market, creating an imbalance between demand and supply.
- Inadequate supply of industrial premises risks losing local businesses looking for more suitable sites elsewhere and deterring inward investment into the local market.
- The ELA considers the release of additional land as essential for meeting the identified need for employment space. Whilst the GBCS has identified several potential sites for employment development purposes, this land will only be released in the longer term, and is not guaranteed to be available for development as much of the land is in private ownership.
- Allocation of Sites 1 and 2 for employment use would provide land that is available for development in the short term (next five years) in a strong-performing strategic employment location. With minimal supply of modern premises and limited amounts of development currently in the pipeline, the development of the two Sites would offer a much-needed increase in available premises in the tight local property market.
- Increased supply of employment land will enable businesses to operate more efficiently with greater amounts of available sites, and lead to fewer businesses exiting the local area in pursuit of more suitable employment units.
- Without the release of additional employment land in Guildford in the short and long term, the level of economic growth in the Borough will

remain constrained as businesses are hindered by a lack of space on which to expand.

- Whilst potential employment sites have been considered for the long term, it is proposed that further allocations for employment development in the short term should also be considered to alleviate the market shortfall.
- It is considered that the Sites are prime candidates for allocation to employment uses for the reasons outlined. The benefits accruing from such a planning decision would not only be felt in the Slyfield Industrial Estate area, but would carry over to the wider commercial property market and local economy in Guildford.

6.0 Landscape and Visual Appraisal

6.1 A Landscape and Visual Appraisal (Appendix 2) has been prepared by Nathaniel Lichfield & Partners to consider the potential landscape and visual effects of the development of the Sites for employment purposes.

6.2 The study has reviewed the current policy context for the Sites and, using a combination of desk study and fieldwork, has identified key locations where visual receptors will be most sensitive to change. The landscape character of the Sites and surrounding area has been reviewed having regard to the existing landscape character assessments, supplemented by fieldwork. The key landscape attributes of the area were identified as:

- the function of the area as a gap between Guildford and Jacobs Well; and
- providing context and visual containment for the River Wey corridor.

6.3 The visual role of both Site 1, and Sites 1 and 2 combined in the surrounding area has been assessed. The report concludes that:

- 1 Whilst there would be potential for some limited views of development though gaps in vegetation cover on the northern boundary of Site 1, this could be mitigated by limited additional tree/shrub planting along this edge which would increase the level of visual containment of the Sites.
- 2 The existing mature tree belts and vegetation to the north and east of Site 1 and north and west of Site 2 would prevent buildings on the Sites playing a visual role in views from the east and west, other than from foot paths within Site 1. Visual effects along the public footpath could also be limited by shrub planting within Site 1.
- 3 There would be no effect on the River Wey Corridor or Sutton Park, both of which would be particularly sensitive to visual change. Indeed, the Sites are considered less likely to impact on the landscape character of the River Wey Corridor than the current employment allocation to the east of the Industrial Estate.
- 4 The visually contained nature of the Sites mean that they currently play a limited visual role in the open character of the Green Belt between Guildford and Jacobs Well (other than along the footpaths within Site 1).
- 5 The key elements contributing to the sense of separation, particularly in views from Clay Lane and Jacobs Well Road, are the fields and open land on the south side of Clay Lane and on the south-east side of Jacobs Well Road; together with the existing tree belts and planting on the east side of Site 1, to the north of Site's 1 and 2 as well as to the north and east of the existing Industrial Estate. This land, to the north of the Sites, would continue to function as a gap between Guildford and Jacobs Well and the development of the site for industrial purposes would not undermine this function.

- 6 Additional landscaping would reinforce the existing boundaries that provide visual containment and would enhance a defensible edge to the Green Belt.

7.0 Green Belt

Policy and Boundary Review

7.1 The Sites are currently designated as Green Belt.

7.2 Government policies on the Green Belt are set out in the National Planning Policy Framework (NPPF) which states that “*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*” [paragraph 79]. It also sets out the five purposes that Green Belts serve [paragraph 80]:

- 1 to check the unrestricted sprawl of large built-up areas;
- 2 to prevent neighbouring towns merging into one another;
- 3 to assist in safeguarding the countryside from encroachment;
- 4 to preserve the setting and special character of historic towns; and
- 5 to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

7.3 When defining Green Belt boundaries, local planning authorities are required [para 85] to:

- ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
- not include land which it is unnecessary to keep permanently open;
- where necessary, identify in their plans areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
- make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;
- satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

7.4 The NPPF advises that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan [para 83]. Guildford Borough Council has already decided that a review of its Green Belt boundaries is necessary, as part of the Local Plan adoption process, in order to potentially accommodate objectively assessed needs for housing and employment uses to 2031.

Guildford Green Belt and Countryside Study

- 7.5 The Council has decided to review the boundaries of the Green Belt and commissioned a Green Belt and Countryside Study²⁷ (GBCS) in order to inform the Local Plan strategy. This is in the context of planning for growth and acknowledgement that the Council cannot meet housing and employment needs from development in the existing towns and villages.
- 7.6 The GBCS used a four stage methodology to identify Potential Development Areas (PDAs).

Stage 1

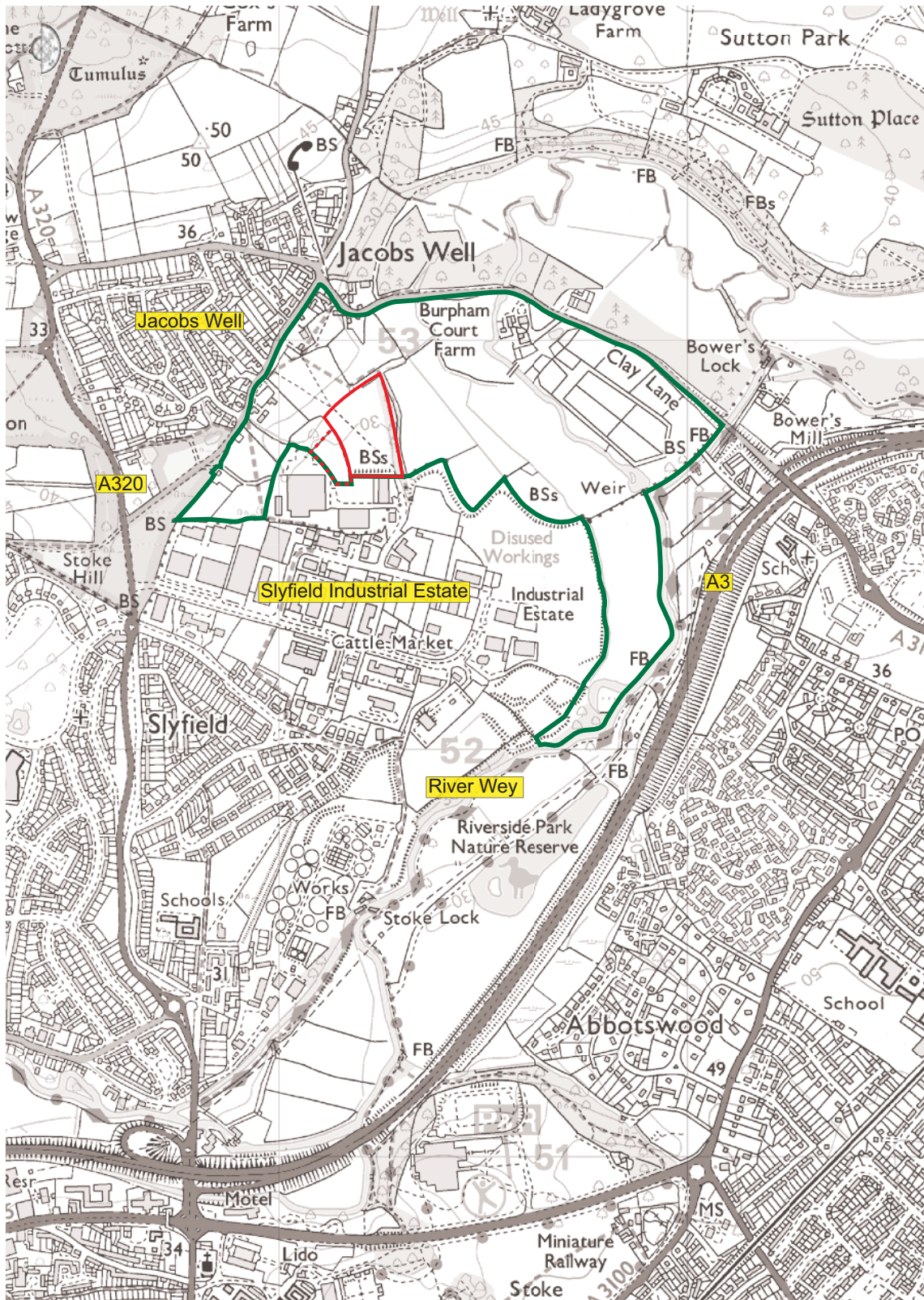
- 7.7 The GBCS divided the Borough into separate land parcels with boundaries based on existing physical features. Sites 1 and 2 were included within a very large parcel of land referenced B3 and comprise only approximately 10% of the parcel (Figure 7).
- 7.8 Inevitably with such a large study, large strategic parcels need to be considered. However, it is also important to consider the development potential of smaller areas within each parcel. B3 is too large for any meaningful consideration to be given to the Green Belt boundaries around Jacobs Well and Slyfield Industrial Estate. It was so large that it links the Slyfield Industrial Estate with Jacobs Well, and virtually links both with the A3 and Burpham. Parcel B3 also includes within it a number of environmentally sensitive areas such as the River Wey floodplain, registered common land, SSSI, SPA, SAC and a Local Nature Reserve (none of which apply to Sites 1 and 2).
- 7.9 Clearly the whole of parcel B3 could not be released from the Green Belt; however we consider that parts of it are not environmentally sensitive, are in suitable and sustainable locations for development and could be built out in a manner that would not harm the Green Belt.
- 7.10 We briefly consider Sites 1 and 2 against Stages 2 – 4 below.

Stage 2

- 7.11 At Stage 2, the degree to which each land parcel contributes to four of the five purposes for the Green Belt was then assessed²⁸. The highest scoring parcels of land (with scores of 3 or 4) were considered to fulfil the purposes of the Green Belt well, indicating that the Green Belt designation should remain. Those scoring poorly (0 – 2) were considered to fulfil the purposes of the Green Belt to a lesser degree and were considered more capable of accommodating development and were taken forward to Stages 3 and 4 for further assessment.

²⁷ Produced by Pegasus Planning Group and published January 2013

²⁸ NB. The encouragement to recycle urban land applies equally to all Green Belt sites and was not assessed.



KEY

Site 1



Site 2



Land Parcel B3



nlp Nathaniel Lichfield & Partners
 Planning, Design, Economics.

Project Land North of Slyfield Industrial Estate

Title **Figure 7: Green Belt and Countryside Study Land Parcel B3**

Client Cassidy Slyfield Ltd

Date November 2013

Scale NTS

Drawn by AH

Drg. No. IL13719-021



- 7.12 The GBCS considers that parcel B3 fulfils all four relevant purposes of the Green Belt and therefore scores four points. This is not surprising for such a large parcel of land. However, we consider that the smaller and more realistic Sites 1 and 2 parcels of land contribute less to the main purposes of the Green Belt in the Borough and could be released.

Stage 3

- 7.13 Stage 3 considers the sustainability credentials of land parcels and recognises that if strategic-scale Green Belt releases are necessary, they would be most appropriately located adjoining the main urban areas of Guildford, Ash and Tongham (as are Sites 1 and 2).
- 7.14 The criteria used for consideration of the sustainability credentials are centred on walking distances to key facilities such as schools, shops, recreation and employment. While such criteria may be appropriate for consideration of residential allocations and development, they are not appropriate for employment / commercial allocations / development.
- 7.15 Sites 1 and 2 are a sustainable and suitable option for additional employment development in the following respects:
- 1 They adjoin the existing Slyfield Industrial Estate and benefit from:
 - A strategic commercial location adjoining Guildford's foremost industrial estate;
 - existing access and linkages, and reducing potential vehicular movements;
 - existing infrastructure;
 - economies of scale resulting from a location in proximity to existing businesses; and
 - existing business networks and contacts.
 - 2 Their development would not harm the Green Belt; as it would maintain the physical and perceived separation of Guildford and Jacobs Well (see below).
 - 3 There are no significant conservation, environmental or biodiversity designations or impacts. The environmental constraints relating to GBCS parcel B3 [para 12.23] (including the River Wey floodplain, registered common land, SSI, SPA, SAC and a Local Nature Reserve) do not apply to Sites 1 and 2.

Stage 4

- 7.16 Stage 4 assesses the environmental capacity of land parcels to accommodate appropriate development.
- 7.17 One or two storey commercial development could be provided within a setting of enhanced perimeter planting and landscaping which would have no impact

on local views and would maintain the physical and perceived separation of Guildford and Jacobs Well. The location and footprint of buildings would also take into account the provision of footpaths within the site, and vehicular access and adequate car parking and servicing facilities.







Review of Green Belt Boundaries

- 7.18 It has been demonstrated above (and the Council already recognises²⁹) that there is a need to expand Slyfield Industrial Estate, and that generally within the Borough there is quantitative and qualitative need for new employment floorspace that cannot be addressed at existing allocations and committed schemes (see sections 4 and 5 respectively above). Therefore, it will be necessary to identify substantial additional land for employment development. The Council recognises that there is insufficient land available within existing settlements and that Green Belt releases will need to be considered.
- 7.19 The potential development of the Sites is considered against the five purposes of Green Belt land in the following paragraphs.
- 1. To check the unrestricted sprawl of large built up areas***
- 7.20 Sites 1 and 2 do not prevent the sprawl of Jacobs Well, but they do prevent the northward expansion of the Slyfield Industrial Estate.
- 7.21 However, development of the two Sites for employment purposes would check the controlled expansion of the employment development in a manner which would not result in the coalescence of the two settlements and defensible Green Belt boundaries would be maintained (see below).
- 7.22 Jacobs Well Road would continue to provide a strong boundary preventing the south and eastwards sprawl of Jacobs Well.
- 7.23 In terms of maintaining a defensible boundary to prevent northward expansion of Slyfield Industrial Estate, the northern boundary features (including the bands of trees and water course) and particularly the garden and (Borough-owned) municipal field boundaries would continue to provide defensible Green Belt boundaries preventing the further northward sprawl of Guildford.
- 7.24 Similarly, the band of trees within the eastern site boundary, and the Borough-owned field boundary would prevent further eastward sprawl.
- 2. To prevent neighbouring towns merging into one another***
- 7.25 Development of Sites 1 and 2 would maintain the physical and visual separation of Jacobs Well from Guildford.
- 7.26 Presently, the minimum gap between Slyfield Industrial Estate and Jacobs Well Road is approximately 140m (Figure 8). The developable parts of Sites 1 and 2 (ie. south of the northern boundary tree lines) is a minimum of 190m from

²⁹ Local Plan Strategy and Sites Issues and Options, paragraph 6.5.



KEY

- Site 1 
- Site 2 
- Green Belt 
- Current Green Belt boundary 
- Suggested Green Belt boundary amendment 
- GBCS potential in setting of Jacobs Well 



Jacobs Well Road. Therefore, a significant gap (larger than the present minimum gap) would remain and prevent the two settlements from physically coalescing. There would be no reduction of the existing minimum distance between Jacobs Well and the Industrial Estate.

- 7.27 As set out in the Landscape and Visual Appraisal, trees on the site boundaries provide a good level of screening and as such the Site is visually contained. The Sites therefore play a limited visual role in the open character of the Green Belt and Jacobs Well. Maintenance and enhancement of the existing boundaries planting would ensure continued visual containment and maintain the role of the Sites in the visual gap between Guildford and Jacobs Well.

3. To assist in safeguarding the countryside from encroachment

- 7.28 The northern and eastern boundary features of the Sites provide defensible Green Belt boundaries preventing the further encroachment of Guildford into the countryside.
- 7.29 Importantly, with respect to the first three purposes of Green Belt land, the Landscape and Visual Appraisal (LVA, Appendix 2) demonstrates that, with limited additional structural planting, development could be contained within the Sites behind existing substantial boundary planting which would screen any new built development in the public views from Clay Lane, the River Wey tow paths and in gaps along Jacobs Well Road.
- 7.30 Thus there would be no material impact on the views and the impression of the gap between Jacobs Well and Slyfield Industrial Estate.

4. To preserve the setting and special character of historic towns

- 7.31 Guildford is an historic town, but Slyfield Industrial Estate is not historic or environmentally sensitive. Jacobs Well is not an historic town.
- 7.32 The GBCS considers that parcel B3 preserves the setting of the Wey and Goldalming Navigations Conservation Area. However, Sites 1 and 2 are located a minimum of 0.5 km from the conservation area and the Landscape and Visual Assessment demonstrates that, in the distant views of the site, a one or two storey commercial development would be well hidden by the existing trees on the eastern boundary.
- 7.33 Therefore, development of the Sites would not impact on the character and appearance or setting of a historic town or conservation area.

5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

- 7.34 The Council recognises that the need for new housing and employment land cannot be met on brownfield or other sites within the urban area and settlements³⁰.

³⁰ Local Plan Strategy and Sites Issues and Options, paragraphs 3.20 – 3.21.

7.35 It is also an important consideration that expansion of the Slyfield Industrial Estate will strengthen its offer, role and attraction to businesses, and therefore contribute to its on-going vitality and viability, encouraging the redevelopment of underused sites on the Estate.

7.36 The opportunity for existing businesses to relocate to an expanded Slyfield Industrial Estate might also release poorer-quality brownfield sites in the urban area for regeneration, potentially for housing development, which would relieve Green Belt pressures elsewhere.

Amending the Green Belt Boundaries

7.37 This section addresses the requirements of the NPPF (para 85) with respect to defining Green Belt boundaries.

ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development

7.38 The Council has identified that economic growth is a requirement and that the necessary additional employment floorspace cannot be provided within the urban area and settlements³¹. Sites 1 and 2 are highly sustainable options for the provision of additional employment floorspace because they are in a strategic commercial location adjoining Guildford's foremost industrial estate.

not include land which it is unnecessary to keep permanently open

7.39 The perceived openness of the Green Belt in this location can be maintained through the development of one or two storey buildings behind substantial existing boundary planting which screens the interiors of the Sites from public views and the remainder of the Green belt, and has the potential for selective landscape enhancement.

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;

7.40 There is a need for additional employment land at Slyfield now, and the Sites provide the only allocation opportunity to meet that in the short term.

satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period

7.41 Sites 1 and 2 should be part of a larger number of allocations that provide more choice for meeting the need for new employment floorspace at Slyfield Industrial Estate and within the Borough as a whole. Such a strategy would ensure that it will not then be necessary to further vary Green Belt boundaries at the end of the development plan period.

³¹ Local Plan Strategy and Sites Issues and Options, paragraphs 3.20 – 3.21.

define boundaries clearly, using physical features that are readily recognisable and likely to be permanent

- 7.42 The new Green belt boundary would be defined by the following physical features that are recognisable and likely to be permanent:
- 1 Northern boundary: the bands of trees and water course, and the garden and municipal field boundaries.
 - 2 Eastern boundary: the band of trees, public footpath and municipal field boundary.
- 7.43 The Borough's ownership of adjacent fields also provides added protection against further development (see Figure 3).

Consideration of Other Potential Allocations

- 7.44 The Local Plan Strategy and Sites Issues and Options suggest the potential for industrial development to meet future needs at three sites that are relatively close to Slyfield Industrial Estate / Jacobs Well. Development should be prioritised at Sites 1 and 2 in advance of these sites for the following reasons:

Guildford Urban Area

- 7.45 The Issues and Options consultation identifies SARP as an area in Guildford that could help to meet future needs. The quantitative and qualitative need for additional employment land, and specifically for expansion of Slyfield Industrial Estate, means that SARP is a good option for additional employment provision (and replacement of existing activities such as the Council Depot). However, we note that the viability of relocating the Sewage Treatment Plant (to enable housing development) has hindered the scheme to date. There are no such viability issues associated with Sites 1 and 2 and these could be delivered within an immediate five year timeframe. Delivery of additional employment floorspace at Sites 1 and 2 might also free-up more land at SARP for housing development and improve the overall viability of SARP.

Green Belt Land Surrounding Guildford Urban Area

- 7.46 The Issues and Options consultation identifies potential development opportunities for new industrial uses / warehouses at two sites located to the west of Jacobs Well, north and south of Salt Box Road (Sites G and H shown on Figure 6):
- Land at Gunners Farm and Bullens Hill Farm (Information Sheet No. 37)
 - Land north of Salt Box Road and west of the railway line (Information Sheet No. 38)
- 7.47 Whilst there is a need for additional employment land on all these sites, Sites 1 and 2 are more sustainable options for new employment development and should therefore be prioritised in advance of developing the Salt Box Road sites for the following reasons:

- 1 Sites 1 and 2 adjoin the existing Slyfield Industrial Estate and benefit from existing infrastructure, access and linkages.
- 2 Development of Sites 1 and 2 would maintain physical and perceived separation between Guildford and Jacobs Well, to a far greater extent than development of the Gunners Hill Farm / Bullens Hill Farm site.
- 3 Development of Sites 1 and 2 would not require any significant removal of trees or other sensitive habitats; they are predominantly grass and over grown scrub. However, development of Gunners Hill Farm / Bullens Hill Farm site potentially requires the loss of significant areas of trees.
- 4 The Salt Box Road sites are in environmentally sensitive locations: partly within 400m of the Special Protection Area, surrounded by a Site of Nature Conservation Importance and part surrounded by a Site of Special Scientific Interest. These environmental constraints do not apply to Sites 1 and 2.
- 5 The Salt Box Road Sites are deliverable over an 11-15 year time frame whereas Sites 1 and 2 could be developed within the next five years.

Summary

- 7.48 The Council is presently undertaking a review of Green Belt boundaries as part of the Local Plan adoption process in order to potentially accommodate objectively assessed needs for housing and employment uses to 2031.
- 7.49 The Council's Green Belt and Countryside Study does not identify any Potential Development Areas within the large land parcel (B3) which includes Sites 1 and 2. However, assessment of employment development on Sites 1 and 2 against the NPPF purposes of Green Belt land demonstrates that:
- 1 Jacobs Well and Guildford would not merge in to one another; they would remain physically and visually separate.
 - 2 There would be no reduction in the existing minimum distance separating Jacobs Well and the Industrial Estate.
 - 3 Development could be contained within the Sites behind existing substantial boundary planting which, with limited additional structural planting, would screen any new development in public views and maintain the visual gap between Guildford and Jacobs Well.
 - 4 Defensible boundaries (including bands of trees and adjoining Borough owned fields) would prevent any further northward expansion of Slyfield Industrial Estate and safeguard the countryside from further encroachment.
 - 5 There would be no impacts on the character and appearance or setting of a historic town or conservation area.
 - 6 Provision of additional employment floorspace on the Sites would assist in urban regeneration of the Slyfield Industrial Estate by strengthening its offer, role and attraction to businesses. This would contribute to its on-

going vitality and viability, and encourage the redevelopment of underused sites on the Estate.

- 7 Businesses relocation on to an expanded Slyfield Industrial Estate might also release poorer quality brownfield sites in the urban area for regeneration, potentially for housing development, which would relieve Green Belt pressures elsewhere. Development of Sites 1 and 2 could also improve the viability of SARP.

7.50 Therefore, development of the Sites for employment purposes would not have a harmful impact on the Green Belt and they should be removed from the Green Belt in order to accommodate the need for new employment floorspace.

8.0 Conclusions

- 8.1 The Council is undertaking a review of Green Belt boundaries as part of preparing a new Local Plan. It accepts that there will be a need to allocate sites outside of the urban areas to accommodate objectively assessed needs for new employment and housing floorspace.
- 8.2 These Representations seek the removal of Sites 1 and 2 from the Green Belt and their allocation for employment development, the merits of which are assessed in this Planning Assessment report.
- 8.3 The Sites (which are 3.3ha and 0.7ha in area respectively) are located immediately to the north of Slyfield Industrial Estate, in the gap between Guildford and Jacobs Well. They are screened by trees on their boundaries such that the interior of the Sites cannot be seen in views from outside the Sites.

Slyfield Industrial Estate

- 8.4 The Sites are well located in respect of the Industrial Estate and access from existing estate roads (North Moors and Dennis Way).
- 8.5 Slyfield Industrial Estate is identified by the Council as the foremost industrial estate in the Borough, providing 2,100 jobs and the majority of Class B2 and B8 floorspace in Guildford. The Estate accommodates a wide range of businesses including car show rooms and retail warehouses, alongside traditional industrial and storage activities. There is a high demand for units and a very low vacancy rate (only 6%). There is a shortage of available premises and land at Slyfield Industrial Estate, which limits the growth of local businesses. Expansion of the Estate would accommodate demand for industrial and warehousing premises in the local area, and enable economic growth and job creation.
- 8.6 Development of the Sites could also integrate with and help to ‘unlock’ delivery of the Slyfield Area Regeneration Project (SARP) by relocating some of the existing uses and / or future employment requirements. This also has the potential to increase the proportion of housing delivered within the SARP boundary.

Employment Land Provision in Guildford

- 8.7 Generally within the Borough, there has been a concentration on the provision of commercial office floorspace over the last decade, which has led to a lack of development of modern industrial units. This risks losing local businesses that may have to relocate elsewhere and deters inward investment into the local market.

- 8.8 The Council's Employment Land Assessment and other studies highlight a shortage of available employment land within the Borough, resulting in the limited development of new Class B2 and B8 units. To address this, the Green Belt and Countryside Study identifies several potential sites for employment development; however, this land will only be released in the longer term (6 – 10, and 11 – 15, years) and there is no guarantee that the privately-owned land will be developed for employment purposes. In contrast, Sites 1 and 2 are already in a strongly-performing strategic employment location and could be made immediately available for development to contribute timely to the identified need in the next five years.
- 8.9 A failure to address the shortage of employment land supply would constrain economic growth in the Borough as businesses will be hindered by a lack of space on which to expand.

Green Belt Review

- 8.10 The NPPF advises that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. The acknowledged need for new employment land provision in the Borough, together with the adjacency of the Sites to the Borough's foremost industrial Estate, provides the required exceptional circumstances. In addition, and importantly, development of the Sites would not have a harmful impact on the Green Belt.
- 8.11 This Planning Assessment considers the potential development of the Sites against the five purposes of Green Belt land and concludes:
- 1 Existing Jacobs Well Road would continue to prevent the sprawl of Jacobs Well south and eastwards. The proposed new Green Belt boundaries (including bands of tress, a watercourse and Borough-owned field boundaries) would prevent the further northward sprawl of Guildford.
 - 2 The physical and visual separation of Jacobs Well from Guildford would be maintained and the neighbouring settlements would not merge into one another. There would be no reduction in the minimum distance separating Jacobs Well and the Industrial Estate. Development could be contained within the Sites behind existing substantial boundary planting which, together with limited additional structural planting on the northern boundary, would screen any new development in public views and maintain the visual gap between Guildford and Jacobs Well.
 - 3 The northern and eastern boundary features of the Sites provide defensible Green Belt boundaries preventing the further encroachment of Guildford into the countryside.
 - 4 There would be no impacts on the character and appearance or setting of a historic town or conservation area.
 - 5 Provision of additional employment floorspace on the Sites would assist in urban regeneration of the Slyfield Industrial Estate by strengthening its offer, role and attraction to businesses. This would contribute to its on-

going vitality and viability, and encourage the redevelopment of underused sites on the Estate. In addition, businesses moving on to an expanded Slyfield Industrial Estate might also release poorer quality brownfield sites in the urban area for regeneration, potentially for housing development, which would relieve Green Belt pressures elsewhere.

- 8.12 As required by the NPPF, the proposed new Green Belt boundaries would be defined by physical features which are recognisable and likely to be permanent (including existing bands of trees, a water course, garden and municipal field boundaries).

Other Potential Allocations

- 8.13 The Local Plan Strategy and Site Issues and Options suggests three potential sites that are relatively close to Slyfield Industrial Estate, for industrial development to meet future needs in the Borough.
- 8.14 The first of these is SARP, which is a good option for additional employment provision (and replacement of existing activities such as the Council Depot). However, the viability of relocating the Sewage Treatment Plant has hindered the scheme to date. There are no such viability issues associated with Sites 1 and 2 and these could be delivered in the first five years of the plan. In addition, delivery of Sites 1 and 2 might also free-up more land at SARP for housing development and improve the overall viability of SARP.
- 8.15 The other two sites are located in the Green Belt to the west of Jacobs Well, north and south of Salt Box Road. Sites 1 and 2 have major advantages over the Salt Box Road sites which strongly indicate that they should be prioritised. These include the adjacency of Sites 1 and 2 to Slyfield Industrial Estate, existing access and linkages, no impact on the Green Belt; and no significant environmental constraints.

New Local Plan

- 8.16 Overall, Sites 1 and 2 are well located, accessible and sustainable options for additional employment development in Guildford; and their development would not have a harmful impact on this part of the Green Belt. They should therefore be removed from the Green Belt and allocated for employment development in the new Local Plan.

Appendix 1
Local Plan Strategy and Sites Issues and
Options
Questionnaire

9.0 **Local Plan Strategy and Sites Issues and Options Questionnaire**

9.1 Cassidy Slyfield Ltd wishes to answer the following questions, as set out in the Council’s Issues and Options Questionnaire.

Q3. How do you want the Borough to develop? What are your views on a new vision for the Local Plan and the possible objectives?

9.2 We support the ‘*Economic objectives*’ for recognising and supporting innovation, and, particularly, providing for and supporting economic growth in environmentally sustainable and accessible locations. We consider that this is vital for local economic revival and growth, and providing jobs of local people.

9.3 In order for business (and particularly local businesses and employment opportunities) to grow, it is necessary to ensure that there is an adequate supply of additional employment Class B1, B2 and B8 floorspace / land.

9.4 Under ‘*Society Objectives*’ we would suggest adding “*providing jobs for local people*”.

Q11. Offices, industrial spaces and our rural economy Which approaches to meeting the existing and new employment needs of our Borough, including supporting the economy of the rural areas, do you think are most appropriate?

9.5 We concur with the Council’s recognition that there is a lack of suitable development sites for new commercial development, and that this discourages investment from new companies and encourages existing businesses to relocate elsewhere [paragraph 3.20]. We also agree that the additional land needed for development cannot all be provided in the existing urban areas and villages and, therefore, that it is necessary to “*look at potential countryside land within and beyond the Green Belt to provide for sustainable development locations*” [para 3.21].

9.6 In terms of the options for the ‘*Supply and location of office and industrial buildings*’, we support the provision of additional employment land to both “*meet demand from a growth in business activity*” and “*as a priority to pursue high levels of growth*”. Such an approach accords with the requirements of the NPPF for the planning system to do “*everything it can to support sustainable economic growth*”, not act as an impediment [para 19] and to “*plan pro-actively to meet the development needs of business and support an economy fit for the 21st century*” [para 20].

9.7 To address the ‘*Lack of suitable office and industrial buildings*’ we support the approach to “*meet the need for higher quality flexible space and larger units*

through expanding existing business parks to provide new, high quality offices and industrial space". The expansion of existing, successful business parks (such as Slyfield Industrial Estate) will make the best use of existing resources, infrastructure, access, connections and networks. As such, it should be prioritised over the creation of new business parks; however, we recognise that these may also be required in order to accommodate required economic growth and new employment opportunities throughout the lifetime of the Plan.

- 9.8 In order to provide for the expansion of existing business parks, it will be necessary to review the status of Green Belt land around them. Releases will be required where land can make the most sustainable contribution to new employment provision, and this is recognised in the Issues and Options paragraph 6.5.

**Q17. Green Belt, countryside, green open spaces and habitats
Which approaches to the Green Belt, countryside and green open spaces do you think are most appropriate?**

- 9.9 We agree that it is necessary for the Council to review its Green Belt boundaries [paragraph 6.5] and consider that releases will be needed to meet economic and employment growth objectives, as well as the objectively assessed need for new housing.
- 9.10 Sites 1 and 2 are located within the Council's Green Belt and Countryside Study (GBCS) land parcel B3. The GBCS recommends that land parcel B3 should not be designated as a potential development area (PDA) to meet future housing and employment growth requirements. The large parcel B3 was said to "*exhibit significant environmental constraints*" [paragraph 12.23] including the River Wey floodplain, registered common land, SSSI, SPA, SAC and a Local Nature Reserve. However, Sites 1 and 2 are a very small component of land parcel B3 (less than 10%) and none of the B3 environmental constraints are applicable to them. Sites 1 and 2 are suitable for business development as a small expansion of the Slyfield Industrial Estate and should be released from the Green Belt.

Q21. Villages in the Green Belt Do you support using the GBCS to help us decide whether we should identify new settlement boundaries for our villages?

- 9.11 If Jacobs Well is inset and removed from the Green Belt, the logical Green Belt boundary would run along Jacobs Well Road, which is a defensible boundary as required by the NPPF.

Q28 Land Surrounding Guildford urban area Do you think that we should develop this land to help meet our future needs or are there other more suitable sites?

- 9.12 The Council has identified potential development opportunities (within 11 – 15 years) for new industrial uses / warehouses at two Green Belt sites located to the west of Jacobs Well, north and south of Salt Box Road (see Figure 6, sites G and H):
- Land at Gunners Farm and Bullens Hill Farm (Information Sheet No. 37)
 - Land north of Salt Box Road and west of the railway line (Information Sheet No. 38)
- 9.13 The quantitative and qualitative need for additional employment land may require that these sites are allocated and developed for industrial / warehousing uses. However, we consider that Sites 1 and 2 are more sustainable options for new employment development, are available within the next five years and should therefore be prioritised in advance for the following reasons:
- 1 Sites 1 and 2 adjoin the existing Slyfield Industrial Estate and benefit from:
 - existing infrastructure
 - existing access and linkages
 - 2 Development of Sites 1 and 2 would maintain the physical and perceived separation between Guildford and Jacobs Well. However, development of the Gunners Hill Farm / Bullens Hill Farm site would result in the virtual coalescence of Guildford and Jacobs Well (bar a band of trees).
 - 3 Development of Sites 1 and 2 would not require any significant removal of trees or other sensitive habitats; they are predominantly grass and over grown scrub. However, development of Gunners Hill Farm / Bullens Hill Farm site potentially requires the loss of significant areas of trees.
 - 4 The Salt Box Road sites are in environmentally sensitive locations: partly within 400m of the Special Protection Area, surrounded by a Site of Nature Conservation Importance and part surrounded by a Site of Special Scientific Interest. These environmental constraints do not apply to Sites 1 and 2.

Q29 Land surrounding villages Do you think that we should develop this land to help meet our future needs or are there other more suitable sites?

- 9.14 The Council has identified potential development opportunities for new industrial uses / warehouses at two sites located at:
- Land around Burnt Common warehouse, London Road, Send (Information Sheet No. 59) – deliverable over 6 – 10 years

- Extension of Peasmarsh industrial estate, Old Portsmouth Road (Information Sheet No. 60) – deliverable over 11 – 15 years.

9.15

Again, the quantitative and qualitative need for additional employment land may require that these sites are allocated and developed for industrial / warehousing uses. However, we consider that Sites 1 and 2 are more sustainable options for new employment development and should therefore be prioritised in advance of developing these sites for the following reasons:

- 1 The Guildford urban area should be prioritised for development.
- 2 Slyfield Industrial Estate is recognised in the Council’s Employment Land Assessment (2013) as the foremost industrial estate in the Borough³². Its expansion should be prioritised over smaller, lower quality industrial estates that are in the countryside and distant from the main urban areas.
- 3 Sites 1 and 2 are adjacent to the Slyfield Industrial Estate and are not in environmentally sensitive locations. However, the Peasmarsh industrial estate adjoins areas of TPOs, the Wey and Godalming Navigations Conservation Area and is in an Area of Great landscape Value.

Q41 Any Other Views?

9.16

Please see our Planning Assessment report which explains why Sites 1 and 2 should be released from the Green Belt and allocated for employment development.

³² Guildford Borough Employment Land Assessment, July 2013 [Appendix U3, p 159]

Appendix 2

Landscape and Visual Appraisal report



Nathaniel Lichfield
& Partners

Planning. Design. Economics.

Landscape and Visual Appraisal

Land North of Slyfield Industrial Estate

On behalf of Cassidy Slyfield Ltd

29 November 2013

13719/SB/JL

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Appendices

- Appendix 1 Definitive Rights of Way
- Appendix 2 Landscape Character Areas (from Guildford Rural Urban Fringe Assessment)
- Appendix 3 Theoretical Zone of Visual Influence Plot

1.0 Introduction

- 1.1 This Landscape and Visual Appraisal (LVIA) has been prepared by Nathaniel Lichfield & Partners on behalf of Cassidy Slyfield Limited to inform the promotion, through the Local Plan process, of land north of Slyfield Industrial Estate, Guildford, for employment use.

The Study Area

- 1.2 The extent of the study area is shown in figure 1. The study area includes:

- 1 3.3 Ha of land in the ownership of Slyfield Cassidy (referred to as Site 1)
- 2 An adjoining field to the west (approx. 0.7 Ha) (referred to as Site 2)



Figure 1: Location of Study Area

Policy Context

- 1.3 The land is currently designated as Green Belt in the Guildford Local Plan, 2003. The Council is preparing a new Local Plan for Guildford which is at Issues and Options stage.
- 1.4 The land to the east of the site is designated as part of the Corridor of the River Wey (G11) in the 2003 Local Plan. This policy seeks to protect and improve the setting visual, amenity, ecological and historic interest of the River Wey Corridor. To the south-east, adjoining the industrial estate, overlapping the Corridor of the River Wey designation, is an area of land designated for employment purposes. The River Wey is designated as a conservation area. A Site of Nature Conservation Importance (NE6) also adjoins the land proposed for the eastern extension of the Industrial Estate.

- 1.5 The evidence base for the New Local Plan for Guildford includes the Green Belt and Countryside Study (GBCS). This study subdivides the area surrounding Guildford into parcels and considers the role of each of the parcels in meeting the purposes of including land within Green Belt.
- 1.6 The two Sites comprise a small part of parcel B3 in the GBCS. This landscape and visual appraisal considers whether the Green Belt role of this area can be maintained with development on the Sites.
- 1.7 The national policy context for Green Belt is set out in the National Planning Policy Framework (NPPF) which states that *“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”* (para 79). It also sets out the five purposes that Green Belts serve (paragraph 80):
- 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; and
 - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 1.8 The NPPF confirms that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan (para 83). When defining Green Belt boundaries, local planning authorities are required to (inter alia):
- not include land which it is unnecessary to keep permanently open; and
 - define boundaries clearly, using physical features that are readily recognisable and likely to be permanent. (para 85)

Methodology

- 1.9 The appraisal has been prepared with reference to Guidelines to Landscape and Visual Impact Assessment, 2013 (3rd Edition) prepared by the Landscape Institute and the Institute of Environmental Management and Assessment and is based on Nathaniel Lichfield & Partners experience of undertaking landscape and visual assessments over many years in urban and urban fringe locations.
- 1.10 The baseline conditions have been established by a combination of desk study and fieldwork. The desk study has included a review of the relevant policy context and documents that define the landscape character of the site and surrounding area. We have reviewed aerial photography and a range of online sources to identify potential sensitive receptors of changes to the landscape views (including the MAGIC database/National Heritage List for England/Surrey County Council’s interactive map and information on Guildford Borough Council’s website).

- 1.11 The theoretical zone of visual influence has been plotted using topographic data using GIS software to identify areas where development of different heights may be visible. This plot has informed the extent of fieldwork but does not take account of screening provided by buildings or vegetation.
- 1.12 The desk study has been complemented by fieldwork, undertaken in November 2013, to review and record the landscape character of the site and surrounding area and the role of the site in the landscape and visual terms. The influence of buildings and trees on the actual zone of visual influence of the site within the surrounding has been reviewed by reference to a number of views that are representative of the visual role of the site within the surrounding area.
- 1.13 Consideration has been given to the opportunity for mitigation of effects and the ability to provide a clear and permanent Green Belt boundary.

2.0 Baseline Conditions

Description of the Study Area and Surroundings

2.1 The key features of the two Sites and the surrounding area are shown on Figure 2 and photographs 1-6. An extract from the designated map showing public right of way is included in Appendix 1.

Site 1

2.2 Site 1 comprises a broadly rectangular unmaintained area of grass and scrub land extending approximately 3.3ha. The northern part of the site is overgrown with scrub.

2.3 Site 1 is at approximately 30m above ordnance datum (AOD) and is generally flat. To the north of the site, land rises gently to the north.

2.4 As indicated on Figure 2, the site is bounded by:

- a car park and a two-storey (equivalent) depot building used by the Post Office to the south (see 1 on Figure 2)
- a 30+m wide band of deciduous woodland incorporating public footpath (FP438) to the east (see 2 on Figure 2)
- an adjoining field (Site 2), to the west (see 3 on Figure 2)
- an area of municipal open ground to the north separated from the site by a fence, stream and some substantial trees to the south (see 4 on figure 2).



Figure 2 Study Areas and Local Context

2.5 The public footpath (F 438) runs through the tree belt within the eastern side of the site from North Moors (a service road) and part way along the northern boundary, immediately south of the fence. There is also some informal access to the site.

2.6 The site is generally well screened from surrounding areas by a combination of mature trees, hedgerows and buildings (see photographs 1-4).



Photo 1: View towards the northern boundary of Site 1 from within the site. A combination of trees and a hedgerow provide visual containment of this edge.



Photo 2: The mature tree belt along the site's eastern boundary provides significant screening



Photo 3: A combination of trees and industrial buildings enclose the southern edge of Site 1



Photo 4: View east across to Site 2. Mature trees and vegetation to the north and east of this field provide significant screening and enclosure

Site 2

2.7

This area covers approximately 0.7ha and mainly comprises unmaintained grass and scrub land and is generally flat (approximately 30m AOD). Adjoining to the north part is a group of substantial mature trees. These limit views out of the site to the north and west. Trees on the boundaries of Site 1 also play a screening role.

2.8 There are no public footpaths providing access to Site 2.

2.9 Site 2 is bounded by:

- Site 1 to the east.
- Slyfield Industrial Estate to the south (Alexander Dennis staff car park).
- Alexander Dennis factory building and hardstanding to the south west.
- An area of dense vegetation to the north-west.



Photo 5 View west from Site 2 showing planting to north east boundary of Alexander Dennis factory building



Photo 6 View north from Site 2 showing vegetation defining the edge of the field. This includes conifers and deciduous species

Surrounding Area

- 2.10 Sites 1 and 2 form part of an area of fields and open land between the industrial estate and the settlement of Jacobs Well. The land is relatively low lying forming part of the valley of the River Wey, but enclosed by rising land to the north.
- 2.11 The land rises towards Jacobs Well, with a small escarpment on the edge of the river terrace evident on a SW-NE axis. Jacobs Well Road to the north-west of the site defines the south-eastern edge of the settlement, with only occasional development on its south-east side, mostly at the junction with Clay Lane. Clay Lane runs to the north and east of the site. The meandering course of the river loops around Burpham Farm Court, on the south side of Clay Lane, creating an 'island'. There are areas of woodland to the north of Clay Lane and east of Blanchard's Hill.
- 2.12 The valley sides rise steeply to the north east beyond the River, with Sutton Place (Grade 1 listed) and Sutton Park (Registered Park and Garden) sitting in an elevated location above the river valley. The valley sides are wooded.



Figure 3 Wider Context

Landscape Character

- 2.13 Landscape character is set out in a number of documents, at national, regional and local levels. The landscape character of the site and surrounding area has been defined in the following documents:

- 1 Natural England's National Character Map - defines a series of landscape character areas across the Country. The site lies on the south eastern edge of the Thames Basin Heaths Character area (129).
- 2 Surrey County Council's landscape character assessment "The Future of Surrey's Landscape and Woodlands" covers the study area. It lies on the edge of an area also defined as 'Thames Basin Heaths'.
- 3 Guildford Landscape Character Assessment and Guidance, prepared by Guildford Borough Council and Land Use Consultants (adopted 2007) provides the most up to date and detailed review of landscape character. The site lies within a Gravel Terrace Landscape type, in the Slyfield Rural Urban Finge Character Area (H2) and is described in Volume 2, the Guildford Rural-Urban Fringe Assessment (GRUFA). A plan showing the character areas is contained in Appendix 2.

2.14 The GRUFA describes the landscape character of Area H2 as follows:

- 1 *"... this area provides a distinct landscape on the edge of the river floodplain. The terraces are slightly elevated ... above the floodplain and contain the lower lying landscape."*
- 2 *"To the west made ground creates a more abrupt transition although this is largely screened by vegetation. The terraces have become the focus for industrial development, notably the Slyfield Industrial Estate, which dominates the eastern terrace. There are glimpses to the edge of the industrial estate from Jacobswell Road, and although the development is largely concealed within wider views, for example from the floodplain ..."*
- 3 *"A greater diversity of land cover is present in the northern part of the area including pastures and small paddocks associated with Burpham Court Farm and mixed woodland at Jacobswell forming part of the Sutton Park estate which lies to the north."*

Landscape Value

2.15 In relation to the setting of Guildford the GRUFA notes that Area H2:

- 1 Plays a key role in relation to the setting of the Wey but notes that much of the terrace is developed and that dense vegetation on the edge of the terraces provides strong visual containment.
- 2 Clay Lane is a minor local gateway into Guildford
- 3 The landscape plays an important role in creating a clear 'gap' and sense of separation between the town and the outlying settlement at Jacobs Well

2.16 The key landscape attributes of the area are set out as follows

"Woodland belts at Jacobswell forming part of Sutton Park – historic value and landscape function;

Areas of common land to the west linking to Stringer's Common;

Farm buildings at Burpham Court Farm;

Function as rural gap between Guildford and the outlying residential area at Jacobswell;

Skyline backdrop to south created by long distance views across to North Downs

Function in providing containment and context for the River Wey and in particular the importance of woodland and screening belts along the edge of the terrace.”

2.17 Accordingly, of relevance to the consideration of the potential of the study area for an extension of the industrial estate are the potential landscape effects of development on Site 1 or on Sites 1 and 2 on:

- 1 the function of the wider area as a gap between Jacobs Well and Guildford
- 2 the visual containment and context for the River Wey and the importance of woodland belts.

2.18 It is noted that whilst the area proposed for the eastern extension to the industrial estate is within an area where the protection of the setting of the River Wey is important, the study area does not fall within this designation.

2.19 In addition, it is noted that the woodland belt to the east and south of the site is identified as a deciduous woodland Biodiversity Action Plan priority habitat.

Visual Receptors

2.20 Visual receptors are people within the surrounding area whose views or visual amenity would be affected by development proposals. Visual receptors that will be most sensitive to changes to views include:

- 1 Users of public footpaths and bridleways, whose focus will be on the landscape and visual amenity
- 2 Users of public open spaces
- 3 Residents with an outlook in the direction of a site

2.21 Other receptors who as a result of their context or activity tend to be less sensitive to changes to views and visual amenity include:

- 1 motorists, their passengers and people using public transport whose views are transient and generally not focussed on visual amenity (unless using a tourist route)
- 2 people at work or engaged in other activities such as shopping

2.22 The following potential locations where people may be sensitive to changes to views have been identified. These are shown on figure 4.

- 1 Residential properties in Jacobs Well with views in the direction of the site
- 2 Open land to the north of the site
- 3 Public footpath nos FP 66, FP 438 and FP 439, the footpath/cycle route along the River Wey and cycle route along Clay Lane

- 4 River Wey Conservation Area
- 5 Sutton Place (Grade 1 listed)/Sutton Park (registered park and garden)
- 6 Burpham Court Cottages (GII listed)
- 7 Queen Hythe (GII listed), Jacobs Well Road (jctn Barnett Row)
- 8 Watts Cottage(GII listed) Jacobs Well Road

2.23 Consideration has also been given to the role of the site in views from Clay Lane, identified in the Council's 2007 Landscape Character Assessment as a minor local gateway to Guildford.

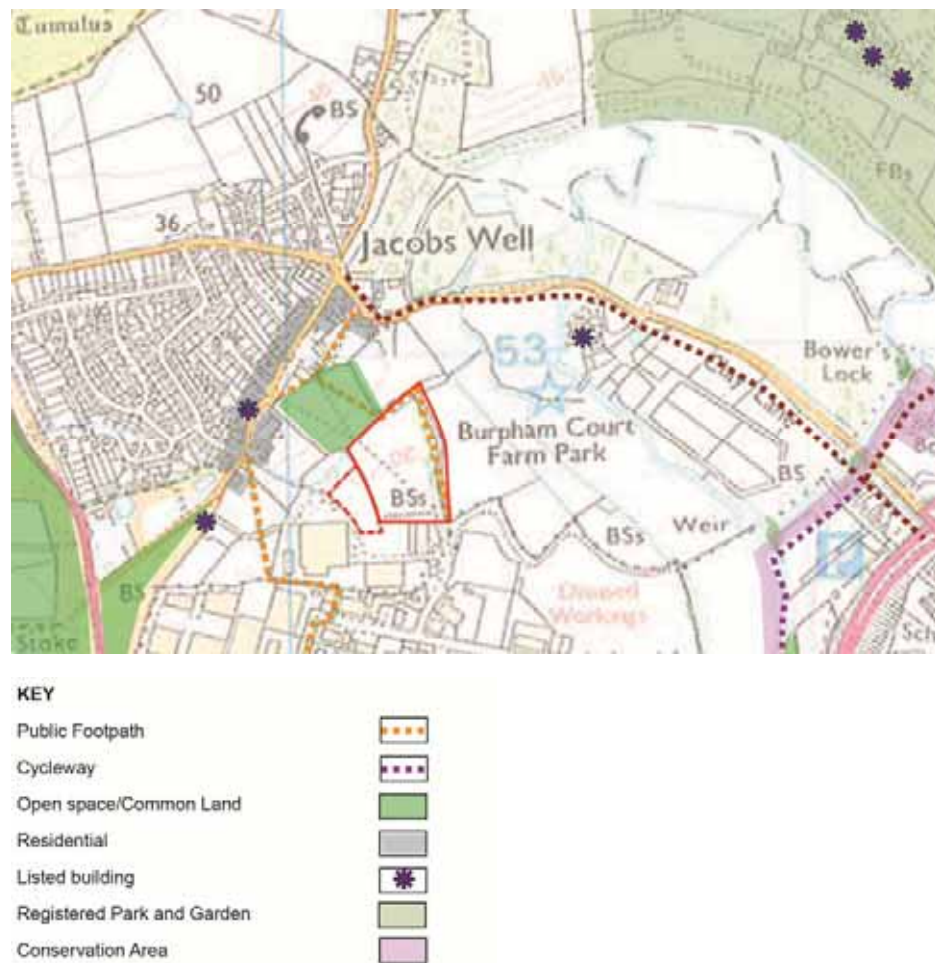
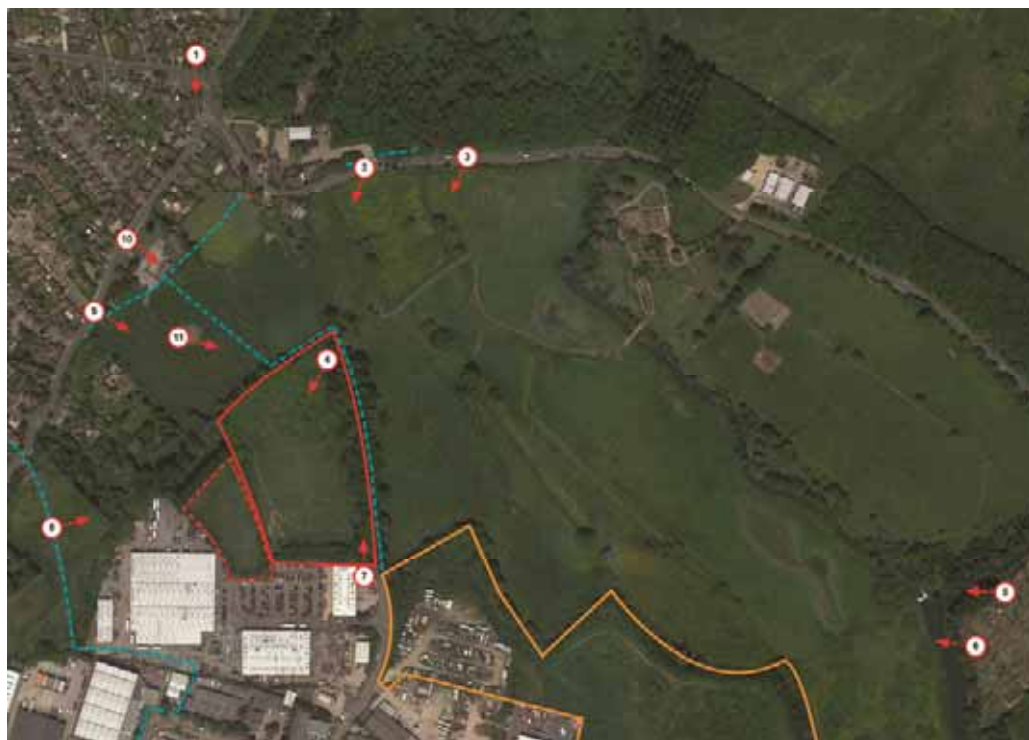


Figure 4 Key Sensitive Receptors

Representative Views

- 2.24 A number of views have been selected to assist in the description of the visual role of the study site in views from the wider area. The views have been chosen to reflect the typical views from key locations in the surrounding area and the potential effects on sensitive visual receptors.
- 2.25 Views from the following locations, shown on Figure 5, have been considered in this appraisal (section 3):

- 1 Clay Lane – view south from junction with Blanchard’s Hill
- 2 Clay Lane – south of Chambers Waste Management premises
- 3 Clay Lane – view south from bridge over stream west of Burpham Farm Court
- 4 Footpath 438 on the eastern boundary of Site 1
- 5 River Wey – View from footpath along south bank
- 6 River Wey – View from footpath
- 7 North Moors Road – view north
- 8 Public footpath 66 between Slyfield Industrial Estate and Jacob’s Well – view east
- 9 Jacobs Well Road – view south-east along unmarked path crossing municipal field
- 10 Jacobs Well Road – view south-east across community centre
- 11 Municipal field – looking south-east towards the Sites



KEY






Slyfield Area Regeneration Project (SARP)	
Site 1	
Site 2	
Definitive Footpaths	
Viewpoints	

Figure 5: Viewpoint Locations (source NLP)

3.0 **Landscape and Visual Analysis**

Theoretical Zone of Visual Influence

- 3.1 A theoretical zone of visual influence (theoretical ZVI) has been plotted based on GIS mapping. This establishes the area within which views of development may be obtained without the screening from existing buildings or trees. The plots (See Appendix 2) illustrate the visibility of a point at the centre of Site 1 at 8m above existing ground level. This correlates to the approximate height of the adjacent Alexander Dennis buildings.
- 3.2 The plot shows that the theoretical visibility of the site, ignoring buildings and vegetation, is constrained by the landform to the north.
- 3.3 They show that a building of up to 8m in height would not be visible from Sutton Place although there would be the potential for views from the valley sides (part of the historic park).

Role of the Study Area in Representative Views

- 3.4 The photographs and text below describe the current visual role of the study area within the surroundings. It confirms the additional role of buildings and vegetation in containing and screening views within the landscape.

View 1

View south from Clay Lane / Blanchard's Hill junction



View Description

The foreground is dominated by the road junctions of Clay Lane, Blanchards Hill and Jacobs Well Road. The bungalows and two storey houses in the view are characteristic of post WW2 residential development in Jacobs Well. In the centre background of the view are trees within the gardens of houses on Clay Lane and Jacob's Well Road.

The study area and Slyfield Industrial Estate are screened by intervening trees and houses and are not visible from this location.

View 2

View south from Clay Lane, south of Chambers Waste Management plc premises



View Description

This view from Clay Lane is centred on the northern corner of Site 1. The foreground is an open pasture field (not in use).

The roofs of two Slyfield Industrial Estate units (on the eastern edge of the industrial estate) can be seen between the trees. The block of woodland on the eastern side of Site 1 can be seen in the centre of the view. Some of the trees along the northern boundary of Site 1 are also visible.

From this position, trees within the garden of a residential property on the Clay Lane frontage screen much of the northern boundary of Site 1 and all of Site 2.

View 3

View south from Clay Lane bridge over stream west of Burpham Farm Court



View Description

This view from Clay Lane is centred on the northern corner of Site 1. In the foreground are fields, laid to pasture.

The trees on the eastern and northern boundaries of the Site 1 are glimpsed between intervening vegetation along the field boundaries.

The trees on the right hand side of the view are located beyond Site 1.

The existing Industrial Estate cannot be seen.

View 4

View south west from the public footpath (FP438) on the eastern boundary of Site 1



View Description

Looking west from the northern end of the public footpath which runs north-south through the belt of trees within the eastern boundary of Site 1, filtered views across Site 1 and towards Site 2 are obtained. The trees on the right of the view form the northern boundary of Site 1.

View 5

View west from the footpath along south bank of the River Wey



View Description

The foreground is formed by the river, footpath and associated riverside trees. The middle ground comprises low lying fields. In the background, beyond the fields, is the tree line which runs along the eastern boundary of the Slyfield Industrial Estate. The Industrial Estate cannot be seen beyond the trees in this view.

Sites 1 and 2 are entirely screened by dense vegetation.

View 6

View west from the east bank of the River Wey



View Description

The foreground is formed by the river and vegetation along its banks. The middle ground is formed by fields.

The edge of the woodland belt along the eastern boundary of Site 1 can be seen in the centre of the view. These are partly screened by intervening vegetation.

The existing Industrial Estate cannot be seen beyond the trees in this view.

View 7

View north from the northern end of North Moors Road (Slyfield Industrial Estate)



View Description

The edge of the Industrial Estate is defined by a galvanised palisade fence, beyond which can be seen the belts of woodland within the south and east boundaries of Site 1. The start of public footpath 438 which runs inside the eastern edge of site 1 can be seen.

View 8

View east from the public footpath 66 linking Jacobs Well Road and Slyfield Industrial Estate



View Description

The trees in the middle ground of this view obstruct views of the northern part of the Industrial Estate and (beyond it) the trees on the northern boundaries of Sites 1 and 2.

View 9

View from Jacobs Well Road southeast along informal path crossing municipal field



View Description

View from Jacobs Well Road through an opening in the hedgerow that provides access to the public footpaths (FP 439 and FP 438) and informal paths which cross the municipal field, seen in the foreground. Defining the edge of the field are trees which form the northern boundaries of Sites 1 and 2. The site itself is not visible.

The trees in the distance on the left hand side of the view are located along the banks of the River Wey.

None of the existing Industrial Estate buildings can be seen in this view.

View 10

View from Jacob's Well Road south east across community centre site



View Description

The trees forming the northern boundaries of Sites 1 and 2 can be seen above the roof of the grey single storey building (Scout Hut) and in the gap between the Scout Hut and the conifers on the Jacob's Well Road frontage.

The community centre and the trees beyond (located on the south western boundary of the community centre) completely obscure the site and its boundary vegetation.

None of the existing Industrial Estate buildings can be seen in this view.

View 11 Municipal field looking south towards the site



View Description

Crossing the Municipal field, the trees on the northern boundary of Sites 1 and 2 are clearly seen defining the edge of the field. The fields beyond are screened by vegetation.

In the distance, on the left hand side of the view, the trees located along the banks of the River Wey can be seen.

None of the Industrial Estate buildings are evident in this view.

Visibility Analysis

- 3.5 The potential visibility of industrial buildings on Site 1, and on Sites 1 and 2 combined, from the surrounding areas has been considered and is summarised below with reference to the representative views.

Views from the north

- 3.6 Views of Site 1 from the north approaching Jacobs Well along Blanchard's Hill are screened by intervening trees and houses (View 1). Neither the trees on the boundaries of the sites or the Industrial Estate can be seen. Similarly views of

Site 1 from Clay Lane, west of the junction with Blanchard's Hill are screened by intervening development and vegetation.

- 3.7 Travelling east along Clay Lane, there are intermittent views of the trees on the northern and eastern boundaries of Site 1 where there are gaps between hedges and trees along Clay Lane (eg. Views 2 and 3). In places (eg. View 2), the roofs of Slyfield Industrial Estate units can be seen.
- 3.8 Dense woodland on the north side of Clay Lane and the valley sides of Sutton Park are likely to prevent views of Site 1 from north of Clay Lane.
- 3.9 The open ground within Site 1 cannot currently be seen in any views from the north. There would, however, be the potential for filtered views of the tops of industrial units beyond the trees on the northern boundary, particularly during the winter. Whilst this would be consistent with the nature of existing views in which some glimpses of units within Slyfield Industrial Estate are obtained, consideration has been given to the potential for mitigation (see below).
- 3.10 The visibility of Sites 1 and 2 combined in views from the north would be the same as the visibility of Site 1.

Views from the east

- 3.11 From the public footpath running through the woodland on the east of the site there would be the potential for local filtered views of building through trees (view 4). Consideration has been given to the potential for additional screening to limit such views.
- 3.12 In views from the River Wey Navigation towpath (National Trust), where receptors will be particularly sensitive to visual change, the existing Slyfield Industrial Estate is screened by a tree belt on the north and east sides of the Estate (Views 5 and 6). The trees within the eastern boundary of Site 1 can be partly seen in views from the tow path, interrupted in places by intervening trees in the fields between the river and Site 1. The open land within the site is screened. Given the level of screening provided by the mature tree belt on the east side of the site, there would be unlikely to be views of development within Site 1 from the River Wey corridor.
- 3.13 The visibility of development on Sites 1 and 2 combined in views from the east would be the same as the visibility of Site 1.

Views from the south

- 3.14 The views from the Industrial Estate are not sensitive to change.
- 3.15 From the head of North Moors, the tree belt on the south and east edges of Site 1 can be seen beyond the steel palisade fence (View 7). From Dennis Way, the tree belt on the southern boundary can be seen beyond the staff car park. The open land within Site 1 cannot be seen from publicly accessible locations to the south.

3.16 Similarly, in views from the south of Sites 1 and 2 combined, vegetation to the north of the car park screen both sites from Dennis Way.

Views from the west

3.17 Existing dense vegetation including trees prevent views of Site 1 (and Slyfield Industrial Estate) from the public footpath (FP 66), which runs north-south through a field to the west of the Industrial Estate, providing a connection to Jacobs Well (View 8).

3.18 Along Jacobs Well Road, a key entrance in to Jacobs Well village, a combination of buildings, boundary treatments and trees lie along the south eastern side of the road generally restrict views to the south-east towards Site 1.

3.19 There are three locations on the outskirts of Jacobs Well where glimpses of the trees on the northern boundaries of Site 1 can be seen:

- 1 Break in hedgerow / fencing where public footpath FP 439 connects to Jacobs Well Road (View 9)
- 2 Gate opening to the municipal field
- 3 Village Hall / Scout hut (View 10)

3.20 The trees on the northern boundary form the background to these views across the Municipal field. The open ground within Site 1 cannot be seen.

3.21 There is the potential for glimpses of views of the tops of industrial units to be seen from these locations and from some locations within the municipal field. Consideration has been given to the potential for mitigation of these potential visual effects.

3.22 In views from the west the visibility of Sites 1 and 2 is the same as for Site 1.

Potential for Mitigation

3.23 In order to contain the visual effects of development on Site 1 or Sites 1 and 2 combined and provide a revised, clear defensible boundary to the Green Belt, it is considered that some additional tree planting, incorporating some lower level shrub planting could be provided along the northern boundary to enhance the existing level of screening. It is considered that structural planting of this nature would prevent views of development and enhance a suitable and defensible edge to the Green Belt.

3.24 In addition, shrub planting could be provided to the edge of the tree belts to further enhance the setting of the public footpaths through Site 1 and prevent views of development.

Summary

3.25 The tree belt on the east side of Site 1 would prevent views of development from the east and north-east including the River Wey Corridor and Sutton Park,

both of which would be particularly sensitive to visual change. Similarly the vegetation to the north and east of Site 2 would restrict views of development on Sites 1 and Sites 1 and 2 combined from the west.

- 3.26 There is limited potential for views from the south and given the industrial nature of this area, receptors are unlikely to be sensitive to change.
- 3.27 Whilst there is currently some vegetation including trees on the northern boundary of Site 1, and a significant degree of visual containment, there is the potential for glimpses of development to be obtained in views from the north and north-west of the site from Clay Lane and Jacobs Well Road and crossing the municipal field where there are gaps in tree cover and breaks in the vegetation. Structural planting could be provided in this area to create a denser tree belt and reinforce the existing level of screening.
- 3.28 Accordingly it is considered that with a limited amount of structural planting, there is the potential to prevent views of development of the site and enhance a defensible boundary.

Landscape Effects

- 3.29 As noted above, in reviewing the suitability of Site 1, and Site 1 together with Site 2, to accommodate industrial development, consideration has been given to the potential effects on the following aspects which are identified in the GRUFA to contribute to the landscape value of this area:
- 1 its function as a rural gap between Jacobs Well and Guildford
 - 2 the visual containment and context for the River Wey and the importance of woodland belts.

Function as a Gap

- 3.30 The visually contained nature of Sites 1 and 2, mean that they currently play a limited visual role in the open character of the Green Belt between Guildford and Jacobs Well other than along the footpaths within and immediately adjoining Site 1. The fields and open land on the south side of Clay Lane and south-east side of Jacob's Well Road together with the existing tree belts and planting on the east side of Site 1, to the north of Site's 1 and 2 and to the north and east of the existing Industrial Estate are the key elements that contribute to this sense of separation.
- 3.31 With the limited additional mitigation envisaged above, development would not be evident in views from the surrounding area. Moreover, the planting would reinforce the existing boundaries that provide visual containment, enhancing a defensible edge to the Green Belt.
- 3.32 In light of the above, it is considered that the land to the north of Site1 and Site 2 would continue to function as a gap between Guildford and Jacobs Well. The development of either Site 1 or Sites 1 and 2 combined for industrial purposes would not undermine this function, subject to the mitigation identified.

Visual Containment and Context for the River Wey

- 3.33 The visual analysis has confirmed that a combination of the topography and degree of screening provided by the existing mature tree belt on the eastern side of the site will ensure that development would be visually contained and would not alter the context of the River Wey.
- 3.34 The Sites are considered to be less likely to impact on the landscape character of the River Wey Corridor than the current allocation to the east of the industrial estate.

4.0 Conclusions

4.1 This Landscape and Visual Appraisal has been prepared to consider the potential landscape and visual effect of the development of land to the north of Slyfield Industrial Estate for employment purposes.

4.2 The study has reviewed the current policy context for the site and, using a combination of desk study and fieldwork, has identified key locations where visual receptors will be most sensitive to change. The landscape character of the site and surrounding area has been reviewed having regard to the existing landscape character assessments, supplemented by fieldwork. The key landscape attributes of the area were identified as

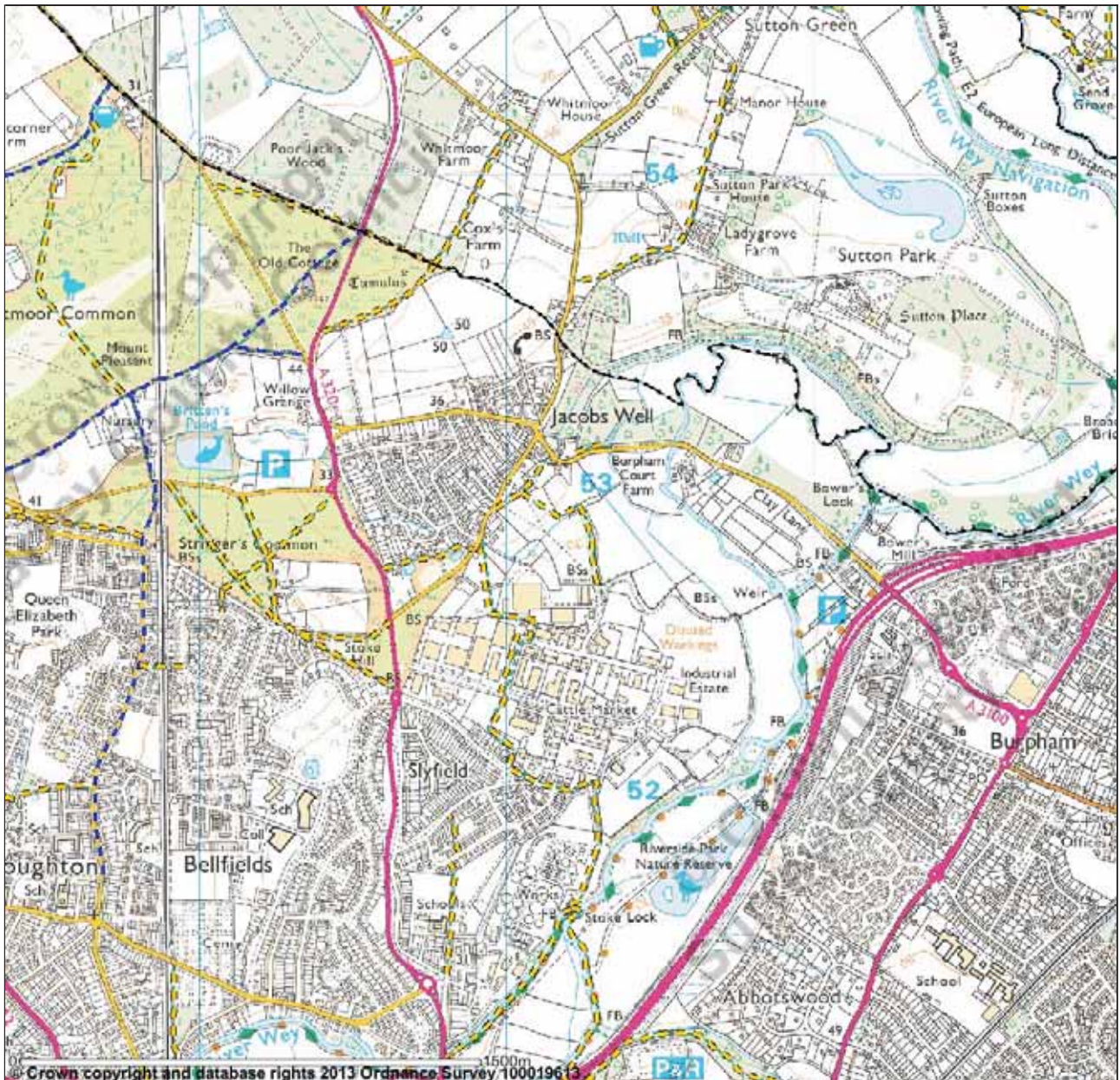
- the function of the area as a gap between Guildford and Jacobs Well and
- providing context and visual containment for the River Wey corridor.

4.3 The visual role of both the Cassidy Slyfield Ltd site (Site 1) and the adjoining Mostyn site (Site 2) in the surrounding area has also been assessed. We conclude that:

- 1 Whilst there would be potential for some limited views of development though gaps in vegetation cover on the northern boundary of Site 1, this could be mitigated by limited additional tree/shrub planting along this edge which would increase the level of visual containment of the Sites.
- 2 The existing mature tree belts and vegetation to the north and east of Site 1 and north and west of Site 2 would prevent buildings on the Sites playing a visual role in views from the east and west, other than from foot paths within Site 1. Visual effects along the public footpath could also be limited by shrub planting within Site 1.
- 3 There would be no effect on the River Wey Corridor or Sutton Park, both of which would be particularly sensitive to visual change. Indeed, the Sites are considered less likely to impact on the landscape character of the River Wey Corridor than the current allocation to the east of the industrial estate.
- 4 The visually contained nature of the Sites, mean that they currently play a limited visual role in the open character of the Green Belt between Guildford and Jacobs Well (other than along the footpaths within Site 1).
- 5 The key elements contributing to the sense of separation, particularly in views from Clay Lane and Jacobs Well Road are the fields and open land on the south side of Clay Lane and on the south-east side of Jacobs Well Road, together with the existing tree belts and planting on the east side of Site 1, to the north of Site's 1 and 2 as well as to the north and east of the existing Industrial Estate. This land, to the north of the Sites, would continue to function as a gap between Guildford and Jacobs Well and the development of the site for industrial purposes would not undermine this function.

- 6 Additional landscaping would reinforce the existing boundaries that provide visual containment and would enhance a defensible edge to the Green Belt.

Appendix 1 **Definitive Rights of Way**



Legend

- Towns**
- Surrey Town**
- Town**
- Local Authority**
- Footpath**
- Byway**
- Bridleway**
- Long distance walks**
- Downs Link**
- Greensand Way**
- North Downs Way**
- Sussex Border Path**
- Thames Path**
- Vanguard Way**



GRID NORTH

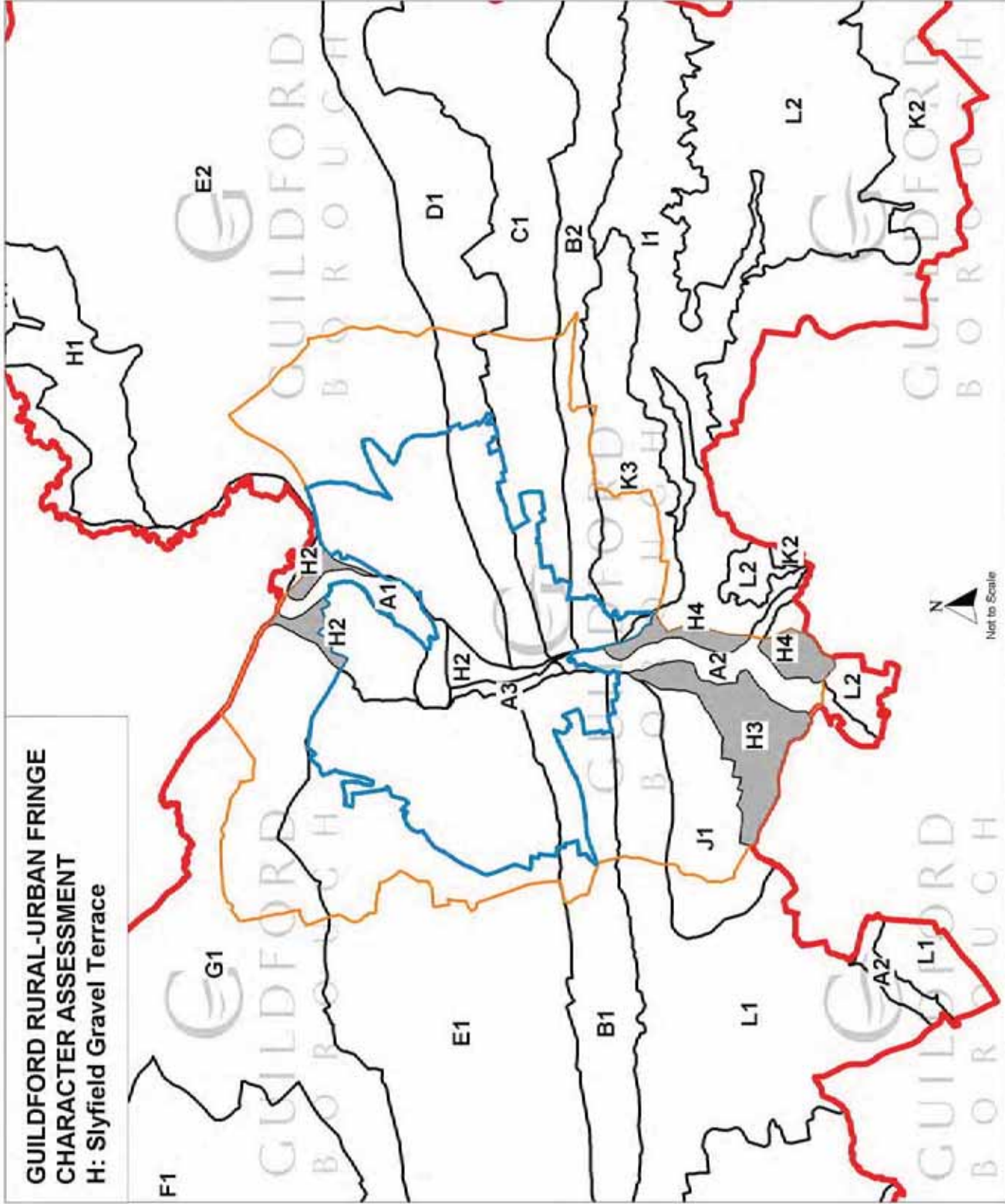
Date Printed
26/11/2013



This map was printed from the Surrey Interactive Map (<http://surreymaps.surreycc.gov.uk>).

Appendix 2 **Landscape Character Areas (from Guildford Rural Urban Fringe Assessment)**

**GUILDFORD RURAL-URBAN FRINGE
CHARACTER ASSESSMENT
H: Slyfield Gravel Terrace**



Legend

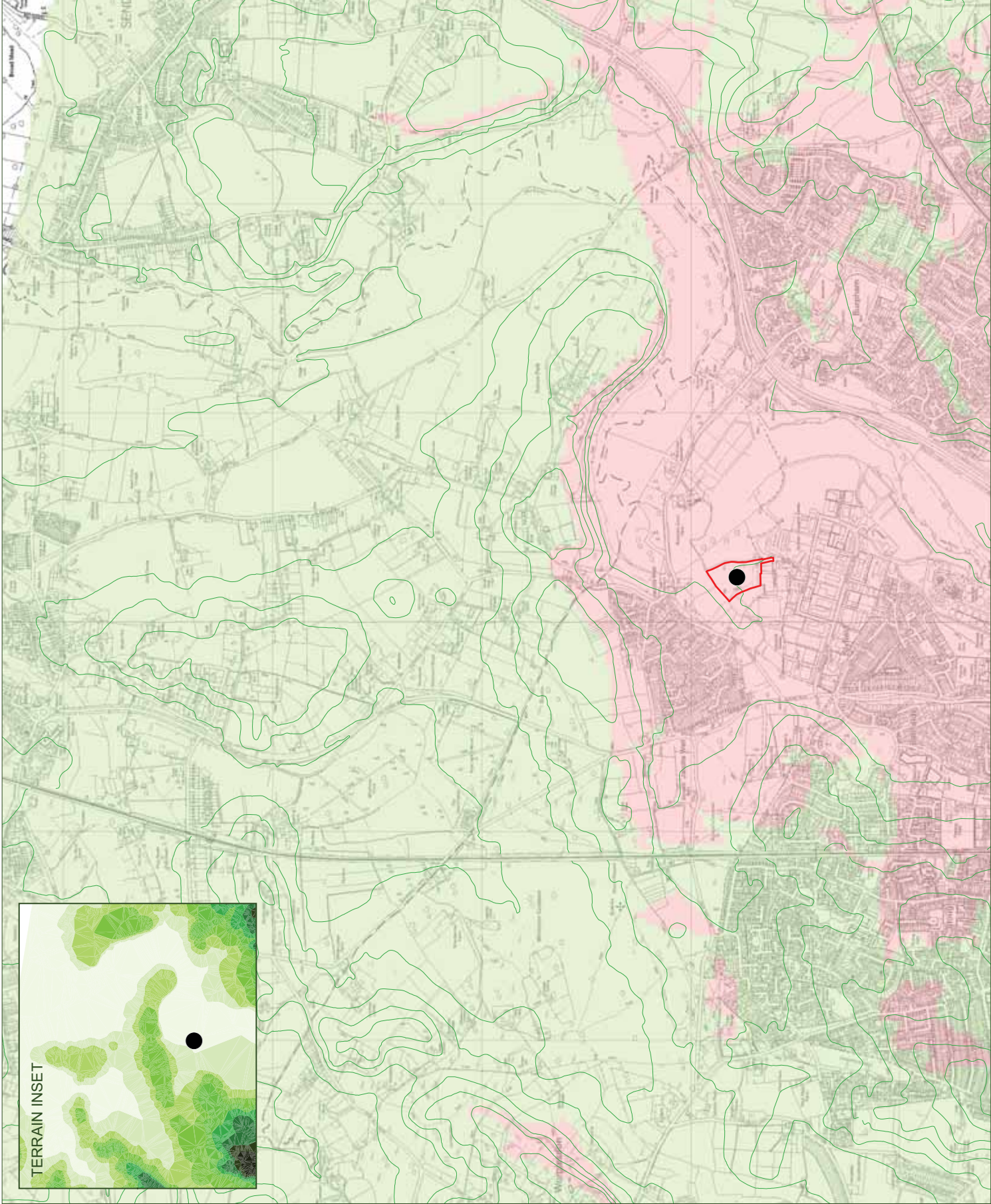
- Gravel Terrace H2: Slyfield
- Gravel Terrace H3: Arlington
- Gravel Terrace H4: Shalford
- LCA Rural Landscape Classifications
- Guildford Detailed Area
- Guildford Urban Fringe Study Area
- Guildford Borough Boundary

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Appendix 3 **Theoretical Zone of Visual Influence Plot**



Key

-  Site Boundary
-  Site Observation Point 1:
approx. 30m above sea level (ground level) + 8m above existing ground level (offset)
-  Contour

Viewshed Analysis*

-  Land not visible from Site Observation Point
-  Land visible from Site Observation Point

* Viewshed does not take into consideration obstacles/barriers such as vegetation and buildings. It is a viewshed based on the terrain solely.

Terrain Inset

Topographic Elevation (metres)*



* Data Source: Ordnance Survey

Problem: Ordnance Survey © Crown Copyright 2011.
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Project: Slyfield, Guildford

Title: Viewshed: Observation Point 1
- 8m above existing ground level

Client: Local Strategy

Date: 15.11.2013

Scale: -

Drawn By: GIS13719/01-01

Dwg. No.: MAR



GIS Reference: S:\CL13719 - Slyfield, Guildford\CL13719 - Slyfield, Guildford - Viewshed - Observation Point 1 - 8m above ground - 15.11.2013.mxd



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Annex 4
Executive Summary Submitted November 2013

Cassidy Slyfield Limited Representation

Land North of Slyfield Industrial Estate

Executive Summary

In response to the Council's consultation on its draft Local Plan Strategy and Sites Issues and Options, Cassidy Slyfield Ltd is promoting the release of its 3.3ha land (Site 1) and the adjoining 0.7ha site (Site 2) adjacent to the Slyfield Industrial Estate from the Green Belt and their allocation for industrial and business use development.

The merits of this site promotion are presented in this Planning Assessment, prepared by Nathaniel Lichfield & Partners, having assessed the employment land needs and undertaken a Landscape and Visual Appraisal to inform an assessment of the suitability of removing the Sites from the Green Belt.

Employment Land Provision

Allocation of the Sites would meet a clear need for employment development.

There is a quantitative and qualitative need for additional Class B1, B2 and B8 Employment floorspace in Guildford Borough, to enable local businesses to relocate and provide choice for new entrants to the local market, such that the Council proposes to allocate additional land for such development by removing it from the Green Belt.

Sites 1 and 2 are well located in respect of the existing Industrial Estate and access, providing a highly suitable and attractive option for the expansion of Guildford's foremost industrial location. They would provide choice and contribute to meeting the local demand in a very sustainable strategic business location. This would, in turn, assist the growth of the local economy and local jobs within the next five years.

According to the Council's own Employment Land Assessment, no other site allocation is available in the 1-5 year period to provide additional employment land. Sites 1 and 2 can address that need in the short term and are clearly sequentially preferable to the list of potential employment sites so far identified, all of which also sit within the Green Belt.

The Sites' allocation is likely to encourage growing local businesses occupying lower quality premises to relocate, thereby releasing in some cases brownfield sites in the urban area for increased housing provision. It could also integrate with and help to unlock the delivery of the Slyfield Area Regeneration Project by relocating some of the existing uses / future employment requirements to the Sites and therefore increasing the proportion of housing delivered with the SARP boundary.

Green Belt and Visual Impact

Development of the Sites would have no impact on key views, landscape and the Green Belt.

The Sites are visually self-contained, as a consequence of the topography of the land and considerable screening provided by the existing mature tree belts on the boundaries of the Sites. Thus, they play a very limited visual role in the open character of the Green Belt between Guildford and Jacobs Well.

This existing structural landscaping provides a strong defensible boundary around the Sites, with scope for enhancement, thereby providing an appropriate permanent boundary for the Green Belt and expansion of the Industrial Estate. Indeed, development of the Sites would not impact on the landscape character of the River Wey corridor or, with limited additional planting, on views from Jacobs Well Road / Clay Lane.

Accordingly, it is concluded that the Sites are suitable for release from the Green Belt to meet the need for expansion of the Slyfield Industrial Estate (and to potentially assist with the delivery of SARP), and that such Employment development can come forward whilst maintaining the gap separating Slyfield from Jacobs Well and without having a harmful visual impact on the Green Belt.





Nathaniel Lichfield
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Annex 5

Representations Letter Submitted 19 September 2014

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Date 19 September 2014
Our ref 13719/SB/BH/7461075v3

Dear Sir/Madam

**Draft Guildford Local Plan: Strategy and Sites (July 2014 Consultation)
Land North of Slyfield Industrial Estate (Site 63): Representation on behalf of
Cassidy Slyfield Ltd and Mr & Mrs Mostyn**

Nathaniel Lichfield & Partners (NLP) has been instructed by Cassidy Slyfield Ltd ('our client') to submit a representation on the above draft Local Plan (in response to consultation questionnaire Q.6).

We do so on behalf of our client and Mr & Mrs Mostyn, who each own part of the proposed site allocation immediately to the north of the Slyfield Industrial Estate (SIE) (i.e. site allocation 63). They are jointly promoting the removal of the site from the Green Belt to enable the expansion of the SIE.

Need and Allocation

Our client's site is proposed to be removed from the Green Belt, and is identified in the Guildford Local Plan: Strategy and Sites (July 2014) document as suitable for accommodating employment development within the short term (i.e. B1c, B2 and B8 uses).

This site allocation was informed by the identification of the site within the draft Employment Land Assessment (ELA) (2014) for Guildford. This study identified a shortage of available employment land in existing urban areas to meet projected land requirements, meaning new employment sites elsewhere within the Borough will be required to stimulate growth within the economy, including reallocating sites currently forming part of the Green Belt (Guildford LP, 2014, para. 4.154).

The allocation of this 4.0ha site to the north of SIE for employment development uses is supported by this representation. The site is suitable, available and deliverable for such development.

We expand our reasoning for that support below, being consistent with the Planning Assessment (November 2013) that accompanied the representation we submitted on behalf of Cassidy Slyfield Ltd during the Issues and Options consultation in November 2013.



1. Sustainable extension to the foremost industrial location within Guildford Borough

The SIE is considered by the Council to be the foremost industrial estate in Guildford (ELA, 2013, Appendix U3), benefitting from strong levels of occupier demand and high-quality infrastructure provision. The industrial estate is identified within the Guildford LP as a strategic employment site, where appropriate employment activities should be retained and developed (Policy 13), and where industrial activities displaced elsewhere should be relocated (ELA, 2013, Appendix U3). The site immediately to the north of the industrial estate therefore represents a highly suitable extension to an already established and thriving employment area.

Alongside the favourable proximity to the SIE, the site benefits from being visually self-contained as a consequence of the topography of the land and screening offered by the existing tree belt on the site boundary. As existing structural landscaping provides a strong defensible boundary, any development at the site would have limited visual impact on the character of the Green Belt.

Thus the site's development could come forward while still maintaining the gap separating Slyfield from Jacobs Well. In fact, the minimum gap between the allocated site and Jacobs Well Road (190m) is greater than the present minimum gap between the SIE and Jacobs Well Road (140m).

2. Support job creation and economic growth within the local economy in the short term

Delivering additional employment floorspace within the Borough will provide both local businesses and new incoming entrants with a greater level of choice in commercial premises. This will enable businesses to relocate and grow more easily, and will contribute to the improved flexibility and competitiveness of the local business base. It is expected that employment development at the site north of the SIE will deliver new employment space that could potentially be used to support the growth aspirations of local SMEs, including those seeking to expand beyond their current premises within the Guildford town centre area.

Meeting local demand for employment floorspace in a highly strategic business location like the SIE will assist in stimulating employment creation and economic growth within Guildford Borough.

While the Guildford LP identifies a number of sites for potential employment development across the Borough, few of these sites will be delivered within the short term (i.e. over the next five years). In contrast, SA 63 is readily available for development over the next five years, with co-operative landowners and good quality infrastructure supporting delivery. The risk profile associated with the allocated site is therefore low.

3. Release brownfield land elsewhere within the Borough for new housing development

The ELA (2013) identified a need for the SIE to provide additional employment space that supports the growth needs of local businesses. The allocation of the site for employment purposes could therefore help to accommodate growing businesses in the local market, which in some cases could release previously developed employment sites within urban areas for housing provision.



The release of urban sites for new housing development supports the Town Centre Vision (2014) for Guildford, which seeks to increase the provision of housing in the town centre area. Supporting housing delivery within urban sites will also help ease pressure on the release of Green Belt land.

In addition, the allocation could help to unlock the Slyfield Area Regeneration Project (SARP) by relocating some of the existing or proposed employment uses at SARP to the extended SIE. This would allow a higher proportion of housing to be delivered within the SARP boundary, and would ultimately increase the potential development value of the regeneration project.

Summary

For the reasons outlined above, promotion of the site to the immediate north of the SIE (i.e. SA 63) for removal from the Green Belt and allocation for employment development is wholly supported. It is a suitable, available and deliverable site for such development, and represents a sustainable extension to the SIE that will deliver a number of positive impacts to the economy in the short term.

Please contact myself, or Sam Bellamy, at NLP if you wish to discuss the above representation.

Yours faithfully

Steven Butterworth

Senior Director



Nathaniel Lichfield
& Partners
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Annex 6

Letter Submitted 18 January 2016 Responding to
Representations Received by the Council in
Response to Allocation of the North Slyfield Site

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FAO: Heather Sandall / Jane Robinson

Date 18 January 2016
Our ref 13719/SB/BH/10385535v7
Your ref

By email: planningpolicy@guildford.gov.uk; heather.sandall@guildford.gov.uk;
jane.robinson@guildford.gov.uk;

Dear Sir / Madam

Draft Guildford Local Plan: Strategy and Sites (July 2014 Consultation Draft)

Land North of Slyfield Industrial Estate (Site 63)

Representations on behalf of Cassidy Slyfield Ltd and Mr & Mrs Mostyn in Respect of Comments Received in Response to July 2014 Consultation

Nathaniel Lichfield & Partners (NLP) has been instructed by Cassidy Slyfield Ltd ('our client') to respond to comments received by the Council following its July 2014 consultation in respect of the Draft Local Plan.

We do so on behalf of our client and Mr & Mrs Mostyn, who each own part of the proposed Draft Local Plan site allocation (Site 63) immediately to the north of the Slyfield Industrial Estate (SIE). They are jointly promoting the removal of the site from the Green Belt and allocation for employment purposes to enable the expansion of the SIE. A site location plan is attached as Enclosure 1 at the back of this letter.

We make these representations following the hiatus in taking the Draft Local Plan forward, and to inform the work that Officers will be undertaking in 2016 in advance of the Regulation 19 consultation which we understand is currently scheduled for June 2016.

Draft Guildford Local Plan: Strategy and Sites

Site 63 is proposed to be removed from the Green Belt, and is identified in the Guildford Draft Local Plan: Strategy and Sites (July 2014) document as suitable for accommodating employment development, commencing within the short term (i.e. B1c, B2 and B8 uses delivered within one to five years). We reiterate that Site 63 would be **available and deliverable** within that timescale.



This site allocation was informed by the identification of the site within the Employment Land Assessment (ELA) (2013) for Guildford. This study identified a shortage of available employment land in existing urban areas to meet projected land requirements, meaning new employment sites elsewhere within the Borough would be required to stimulate growth within the economy (Draft Local Plan, para 4.154), including allocating suitable sites currently forming part of the Green Belt.

The 2015 Employment Land Needs Assessment (ELNA) updates the 2013 ELA to assess how much employment land and floorspace is likely to be required within the borough to 2033. Overall, the findings of the ELNA indicate a lack of available and suitable employment land in the borough to meet existing and future needs of businesses, with existing strategic employment sites in the borough recognised as key locations to support additional employment floorspace in the future.

It identifies SIE as an important strategic employment location with only 185 sq.m of vacant industrial floorspace and no potential for intensification or additional floorspace at the estate (i.e. there is strong demand for space at the estate with no real capacity to increase the quantum of space through intensification) (ELNA, Table 4-1). Property market experts suggest the current supply of industrial / storage premises in Guildford is not meeting existing demand, with a lack of available and suitable sites to meet the needs of occupiers (ELNA, para 5.4.6). The ELNA recognises there is a risk that a share of demand is currently going unmet due to a shortage of high-quality space in the right location desired by both office and industrial occupiers. Over the period to 2033, the ELNA estimates an additional 4.7ha to 5.3ha of industrial / storage land and 37,200sq.m to 47,200sq.m of office and R&D floorspace will be required to accommodate demand for employment space within the borough (ELNA Table 6-7), which is set within the context of a lower supply of emerging employment space identified in the ELNA compared to the 2013 ELA to help meet this need.

It is therefore **necessary** to allocate additional employment land. The ELNA recommends that the Council should act to identify, retain and intensify existing employment sites that are suitable, especially strategic sites (including SIE). Being adjacent to the strategic SIE, Site 63 is particularly **suitable** for employment development.

The findings of the ELNA, therefore, continue to provide strong support for the release of Site 63 for employment development which would contribute towards meeting identified need for additional employment land through an extension of the strategic industrial estate.

Alongside the favourable proximity to the SIE, the site benefits from being visually self-contained as a consequence of the topography of the land and screening offered by the existing tree belt on the site boundaries. As existing structural landscaping provides a strong defensible boundary, any development at the site would not have any significant adverse impact on key views or the landscape character of the Green Belt.

Previous Representations Submitted on Behalf of Cassidy Slyfield Ltd and Mr and Mrs Mostyn

NLP has previously submitted the following documents in support of removal of Site 63 from the Green Belt and its allocation for employment purposes:

- 1 Representations in response to Issues and Options consultation on Draft Local Plan Strategy and Sites, submitted by email and post (29 November 2013). These documents, which make



both the case for removal of the site from the Green Belt and allocation for employment purposes, comprise:

- Planning Assessment (including completed Local Plan Strategy and Sites Issues and Options Questionnaire)
 - Landscape and Visual Appraisal
 - Executive Summary
- 2 Representations letter in response to Draft Guildford Local Plan: Strategy and Sites (July 2014) Consultation: letter dated 19 September 2014, sent by email and post.

NLP has also submitted the following documents in support of the Council's proposed Clay Lane Link Road:

- 3 Representations letter supporting the proposed Clay Lane Link Road dated 25 March 2015.
- 4 Representations letter supporting the proposed Clay Lane Link Road dated 5 November 2015.

We attach further copies of these documents for Officers' convenience (full set with email letter; Executive Summary only with hard copy).

Responses to Third Party Representations

In response to the July 2014 draft Local Plan consultation, the Council received a small number of representations in respect of Site 63. These were logged by the Council as 41 separate comments (excluding NLP's representations submitted on behalf of CSL and Mr and Mrs Mostyn); however, there was some duplication (see below) and, in fact, the responses were from a total of 33 separate parties. To put this in context, the Council received 20,293 comments in response to the draft Local Plan consultation and only a tiny percentage (0.16 %) mentioned Site 63. Of the 33 respondents, 10 of them either support the allocation of Site 63 or do not object; while 23 raised concerns or objected (i.e. 0.1 % of all responses).

We address the issues raised in each representation in the order in which they were submitted to the Council, starting with comments in support / no objection and followed by objections.

Comments in Support / No Objection

The Guildford Society (Julian Lyon) – 17 September 2014 (DLPSS14/9553 and DLPSA/4343)

The Society **supports** the allocation of Site 63, particularly to accommodate displaced businesses in the town centre / at housing allocations (Walnut Tree Close and Woodbridge Meadows). We agree that allocation of the site for employment purposes could help release previously developed employment sites within urban areas for housing provision. The release of urban sites for new housing development supports the Town Centre Vision for Guildford, which seeks to increase the provision of housing in the town centre area. Supporting housing delivery within urban sites would also help ease pressure on the release of Green Belt land.

The Society suggests bunded woodland to the site boundaries. As set out above and below, it is proposed to retain the boundary planting with some limited additional tree / shrub planting to increase the level of visual containment of the site.



The Society also raises the possibility of Site 63 potentially being used as a 'park and ride' facility. We consider the site to be better suited to expansion of SIE and not to be a suitable location for 'park and ride'. In any case, such a use would need to be promoted by the Council and it is not something that has been raised with the owners.

Westborough, Broadacres & District Residents Association (David Bird) – 13 September 2014 (DLPSA/608)

The Residents Association **supports** Slyfield Area Regeneration Project and the allocation of Site 63.

Roger Hawes – 7 August 2014 (DLPSA/143)

Although this is logged by the Council as an objection, the respondent states that "... I **accept an enlargement of Slyfield Industrial Estate (site 63)**..."[our emphasis]. The objection element relates to another site at Burpham Court Farm.

Barry Jutsam – 12 August 2014 (DLPP3M/139)

Again, this is logged by the Council as an objection, but in respect of Site 63, the respondent states that he has **no concerns**. The objection element of the comments relate to other sites.

D Tucknott – 18 August 2014 (DLPSA/211)

This representation states no objection subject to no loss of Green Belt. The Green Belt is addressed below.

TB Carter – 28 August 2014 (DLPSA/361)

This representation **supports** the proposals for a number of sites, including Site 63.

Chris Franklin – 17 September 2014 (DLPSA/748)

This representation also **supports** the allocation of Site 63 and suggests that some road improvements may be required, including Clay Lane Link Road (see below).

Paul Handley – 19 September 2014 (DLPSA/1021)

This representation **supports** the allocation of Site 63.

Martin Barker – 19 September 2014 (DLPSS14/7867)

This relates to a number of sites to the north west of Guildford. The respondent states that he objects to all of them **except** Site 63: "*With the exception of Site 63 (Slyfield) I therefore object to all these developments*".

Barry Keane and Hannah Dawson – 21 September 2014 (DLPSA/4441 and DLPSA/4442)

These two separate and identical representations concern Sites 48, 63, 64, 65 and 121, all at or close to the SIE. They are generally **supportive** of development to expand the industrial estate and increase employment opportunities. They do not make any specific comments in respect of Site 63, but rather raise a number of more general housing, infrastructure and environmental issues that are only of peripheral relevance to the site.



Comments Objecting

Linda Baker – 9 July 2014 (DLPSA/12)

This is an objection on traffic grounds.

Traffic

Our client's site is approximately 4 ha and its development would represent an approximately 10% expansion of the present Slyfield Industrial Estate (SIE), currently 38 ha according to the 2013 ELR. Development of the site is unlikely to have significant additional transport impacts. Notwithstanding, a Transport Assessment would be required to be submitted in support of either an outline or full planning application for development of the site which would assess the impacts of the proposal on local traffic conditions and highways safety.

The Council's proposal for a new link road between Clay Lane and the SIE, to provide a second point of entry and exit to the estate, is well advanced. This would improve access and ease current congestion issues. It would also help existing businesses grow and encourage new businesses to relocate to the estate which will help retain jobs and create new employment opportunities. NLP, on behalf of CSL and Mr and Mrs Mostyn, has written to the Council to support the Link Road (please see above, letters attached). The Council is committed to submitting a planning application for the proposed link road in early 2016. It expects to commence construction of the proposed road once planning permission has been granted (a decision is anticipated in summer 2016).

Fred Morgan – 2 September 2014 (DPLSA/379 and DLPSA/383)

This objection has been registered twice. It raises traffic and drainage issues. Traffic is addressed above. Drainage / Flood Risk

The north eastern part of the site is located within Flood Zone 2 (medium probability of flooding); the remainder of the site is in Flood Zone 1 (low probability of flooding)¹.

The site allocation is for "light industrial (B1c) and / or general industrial (B2) and / or storage and distribution (B8)". General industry, storage and distribution uses are defined as "less vulnerable uses"² and are appropriate in Flood Zone 2³.

A Flood Risk Assessment would be required to be submitted in support of either an outline or full planning application. This would assess the likelihood and extent of potential flooding on site and within the surrounding area, provide details of any existing flood defences which could protect the site, and recommend surface water management and sustainable urban drainage systems and other measures which could reduce the risk of flooding.

¹ <http://www.environment-agency.gov.uk>

² National Planning Practice Guidance, Paragraph: 066, Reference ID: 7-066-20140306

³ National Planning Practice Guidance, Paragraph: 067, Reference ID: 7-067-20140306



Pamela Hawes – 3 September 2014 (DLPP3M/746)

This objects to a number of sites. The objection to Site 63 is on grounds “*extra businesses at Slyfield ... will cause more traffic and damage to our roads, and we will lose our lovely walking area...*”. The traffic issue is addressed above.

Walking / Public Footpath

Development of Site 63 would retain existing marked public footpath FP 438 which links SIE with Jacobs Well Road (please see Enclosure 2: Definitive Footpaths).

This footpath runs through Site 63 approximately north / south from the top of North Moors to the north-eastern corner of the site, where it passes over a small wooden bridge and then turns west at right angles to run across the top of the site. It provides a flat and attractive route through the site for ramblers, dog walkers and other recreational users, via the band of trees located to the east of the site. From about half way along the northern boundary, the footpath crosses north-west in to the adjoining field purchased by the Worplesdon Parish Council and links to the Village Hall / Jacobs Well Road. There would be no need to re-route the definitive public footpath access through the site.

The Parish Council field provides a large recreational facility for the use of Jacobs Well (and beyond) residents, which is suitable for informal sports and recreation, walking, dog walking, picnicking, and outdoor community events. Development of Site 63 would in no way inhibit access to or use of the facility.

Kenneth Thomson – 9 September 2014 (DLPSA/621)

This objection mistakenly refers to development of homes on the site, and is focussed principally on drainage and flood risk, which is addressed above.

Ann and David R Wright – 11 September 2014 (DLPSA/704 and DPLSA/733)

This objection has been registered twice. It raises the following issues: building on Green Belt land; potential noise and pollution to properties along Jacobs Well Road; and adjacency to “*land purchased by Worplesdon Parish Council as a village green*”.

Green Belt and Visual Impact

This issue is dealt with in detail in the Planning Assessment (principally Chapters 6 and 7) and Appendix 2 Landscape and Visual Appraisal documents (attached) which conclude that the development of the site would have no significant adverse impacts on key views, landscape and the Green Belt.

In summary, Site 63 is visually self-contained, as a consequence of the topography of the land and considerable screening provided by the existing mature tree belts on the boundaries of the site. Thus, it plays a very limited visual role in the open character of the Green Belt between Guildford and Jacobs Well. This existing structural landscaping provides a strong defensible boundary around the site, with scope for enhancement, thereby providing an appropriate boundary for the Green Belt and expansion of the Industrial Estate. Indeed, development of the site would not impact on the landscape character of the River Wey corridor or, with limited additional planting, on views from Jacobs Well Road / Clay Lane.



Noise and Pollution

The SIE (Dennis site) comes within less than 100m of the nearest dwelling on Jacobs Well Road. Site 63 would be further away than this from the nearest dwelling. Therefore, the distance, together with attenuation provided by the existing mature trees belts along the boundaries of the site, means that significant additional impacts are unlikely to arise.

Importantly, any activities on the site would be required to comply with applicable environmental and noise legislation, Regulations and other restrictions (including planning conditions) to protect the amenity of residents and other occupiers in Jacobs Well.

Land Purchased by Worplesdon Parish Council

As set out above, the development of Site 63 would not have any impact on the land located to the north which has been purchased by the Parish Council: development would retain the existing marked public footpath FP 438 which links the Parish Council land with SIE. There would therefore be no changes to public footpath access to the Parish Council field and no other adverse impacts.

Ann and David R Wright – 17 September 2014 (DLPSA/3139)

The same respondents separately commented that development of Site 63 was “*not welcomed but hopefully when extended suitable visual and noise protection provided for adjacent Village Hall, Scout Hut, allotments, leisure fields and properties on Jacobs Well Road*”. This represents a softening of their objection and acknowledgement that Site 63 will be allocated and developed. We have addressed noise issues and visual screening above.

Pauline Rowland – 12 September 2014 (DLPSA/738)

This is an objection to both Slyfield Area Regeneration Project (SARP – Site 48) and Site 63. In respect of the latter, the objection is on grounds that industrial use would be too close to Jacobs Well and would have a detrimental effect on those living nearest to it. The nature of the alleged detrimental effects are not mentioned; however, noise, pollution and visual impacts are addressed above. It is implied that housing would be a better use of Site 63; we consider that employment uses are suitable use for the site, given its adjacency to the industrial estate; however, the owners would be happy to discuss the potential for housing, should the Council consider it to be appropriate.

Steve and Maureen Knight – 12 September 2014 (DLPSA/569)

This is an objection on grounds of loss of green fields, and additional noise, traffic and pollution; all matters addressed above.

Hilary Barker – 15 and 19 September 2014 (DLPP3M/3461 and DLPSS14/6818)

This is an objection (which has been registered twice) to development of a number of (mainly housing) sites in Worplesdon. In respect of Site 63, the objection refers to 1,000 homes, which is clearly an error and probably relates to SARP. The objection is principally on grounds of harm to the Green Belt, which is addressed above.



John Meredith – 17 September 2014 (DLPSA/774)

This representation acknowledges that Site 63 is “*wasteland*” but does not welcome its development due to potential noise (addressed above) and visual impacts for residents on Jacobs Well Road and the Village Hall. It also indicates that a historic water channel may have passed through the site.

Visual Impacts from Jacobs Well Road

This issue is dealt with in detail in the Planning Assessment and Landscape and Visual Appraisal documents (attached) which conclude that the development of Site 63 would have no adverse impacts on key views. Whilst there would be the potential for some limited views of development through gaps in vegetation cover on part of the northern boundary of Site 63 (i.e. closest to Jacobs Well Road), this could be mitigated by limited additional tree / shrub planting along this edge to increase the level of visual containment of the site.

Historic Water Channel

The existing water channel running along part of the north-western edge of the site would be retained and would not be affected by the development. If any other water channel/s ran across Site 63, it has been filled. If necessary, the Council could impose a condition requiring archaeological investigation in advance of development; albeit, we do not consider that a historic water channel would be of sufficient heritage significance to justify such a condition.

Paul Gerrard – 17 September 2014 (DLPSA/843)

This letter objects on Green Belt grounds, addressed above.

Thames Basin Heaths SPA

It also raises the location of the site in respect of the Thames Basin Heaths SPA. Site 63 is located within 400m to 5km of the Thames Basin Heaths SPA, where the impact of development can be avoided and / or mitigated in accordance with the Council’s Thames Basin Heaths Special Protection Area Avoidance Strategy 2009-2014 (2010). The Strategy recognises that housing development is most likely to have impacts on the SPA; however, some non-residential planning applications in the vicinity of the SPA (depending on the use proposed and scale) would need to be screened to assess whether they would have a likely significant effect (individually or in combination with other plans or projects) and where necessary a full Habitats Regulations assessment would need to be undertaken.

Nicola Harding – 19 September 2014 (DLPSA/3198)

This objection is on grounds that “*development of the size proposed*” would “*change the character of the area and Jacobs Well village and is, therefore, an incompatible and unacceptable use of common land and a greenbelt, greenfield site*”.

Please note that Site 63 is not ‘common land’.

Character of Area and Jacobs Well

This is dealt with in detail in the Planning Assessment and Landscape and Visual Appraisal documents (attached). For example, paragraphs 7.18 – 7.36 of the Planning Assessment explain



that the development of Site 63 would maintain the physical and visual separation of Jacobs Well from Guildford, and that the trees on the boundary provide a good level of screening / visual containment. As such, development of the site would not have an adverse impact on the character (and appearance) of the surrounding area and Jacobs Well.

Green Belt issues are addressed above.

Graham and Barbara Egerton – 19 September 2014 (DPLSA/1247 and DLPSA/1253)

These two identical objections are on grounds of: loss of visual amenity, noise and pollution, and highways and traffic impacts (all dealt with above); and loss of recreational amenity and impact on wildlife.

Recreational Amenity

The objection relates to use of the public footpath running through the copse along the eastern boundary (ie. existing marked public footpath FP 438). As set out above, the woodland and marked public footpath would be retained and would be unaffected by development.

Wildlife

Boundary trees and shrubs would be retained (including the woodland running along the eastern boundary). Therefore, the main habitats on the site would be retained. A Biodiversity Survey and Report may be required to be submitted in support of either an outline or full planning application and, if so, this would identify the potential for any protected species to be present on the site and any mitigation required.

Worplesdon Parish Council (Gaynor White) – 19 September 2014 (DLPSA/4374)

The Parish Council objects on Green Belt, visual impact, traffic and air pollution grounds; all of which are addressed above.

Malcolm D Bowyer – 20 September 2014 (DLPSA/2792)

This is an objection on Green Belt, noise and air pollution grounds, which are addressed above.

David and Lisa Edwards – 21 September 2014 (DLPSA/2043 and DLPSA/1731)

These separate objections are against development in the Green Belt, which is dealt with above.

Huw and Vanessa Jenkins – 21 September 2014 (DLPSA/2182)

This is an objection on Green Belt, traffic, noise and pollution grounds, which are addressed above.

Martin Maunder – 21 September 2014 (DLPSA/1121)

This objects to building on the Green Belt and on traffic grounds; addressed above. It also mentions that the objector uses the site for recreational purposes, again an issue that is addressed above.



John and Elizabeth Ball – 22 September 2014 (DLPSA/4330)

This refers to an increase in HGV traffic on The Street. There are no streets of this name in the vicinity of Site 63 and it may be that this objection has been linked to Site 63 in error.

Ray Partridge – 22 September 2014 (DLPSA/1850)

This is an objection on Green Belt and visual impact grounds, which are addressed above.

Elizabeth Fry – 22 September 2014 (DLPSA/1304 and DLPSA/1307)

These are two separately registered objections on grounds of traffic; and requesting preservation of the copse between Jacobs Well and SIE, and improvements to the path between the two areas.

Traffic is addressed above.

The copse is not within Site 63. It is located to the north of that part of Site 63 owned by Mr and Mrs Mostyn (see Enclosures 1 and 2) and would not be affected by the allocation for employment development. As set out above, the boundary planting would be retained and enhanced.

Also as set out above, the existing marked public footpath FP 438, linking Jacobs Well and SIE, would be retained.

E Roger King – 22 September 2014 (DLPSA/2638)

This raises concerns in respect of traffic, separation of Slyfield and Jacobs Well, and air pollution. All these issues are addressed above.

Jacobs Well Residents Association (Janet Smith) – 22 September 2014 (DLPSA/1667 and DLPSA/1673)

These are two separately registered objections to the Clay Lane Link Road and Site 63.

The objection to the Clay lane Link Road is partly on grounds that it would enable expansion of Slyfield Industrial Estate (including development of Site 63) and the creation of 1,000 jobs.

We consider the creation of 1,000 jobs to be a major benefit for Guildford. In addition, we agree with the Council that the expansion of the strategic employment location should be encouraged and enabled (see above).

The objection specific to Site 63 is on grounds of proximity to the field acquired by Worplesdon Parish Council and development on the Green Belt; issues addressed above.

Hi Tech

The Residents Association also suggests that the Council should be “concentrating on the high tech industries for which we are famous” rather than “ugly, sprawling industrial units and warehousing”. Site 63 could accommodate high tech industries within the Class B1(a), B2 and B8 allocation; the full case for employment development is included in the Planning Assessment (e.g. Chapters 4 and 5 in particular). The landscape and visual impacts of employment development are addressed above and in detail in the in the Planning Assessment (e.g. Chapters 6 and 7 in particular) and in the Appendix 2 Landscape and Visual Appraisal.



David Smith – 22 September 2014 (DLPSA/1657 and DLPSA/1663)

These are identical to Janet Smith's objections on behalf of the Jacobs Well Residents Association.

Keith Witham – 23 September 2014 (DLPSA/1405)

This objection is identical to that of Worplesdon Parish Council (see above).

Concluding Analysis

In preparing the draft Local Plan, the Council has found that it is **necessary** to allocate additional land for employment development, and that Site 63 is **suitable** (particularly in terms of adjacency to the SIE and limited impacts on the character of the Green Belt), **available** and **deliverable** for such development.

In response to the July 2014 draft Local Plan consultation, the Council received a small number of representations in respect of Site 63. Ten responses either supported the allocation of Site 63 or did not object; importantly, this includes support from the Guildford Society. Only 23 of the 20,000+ comments received by the Council raised concerns or objected to Site 63 (0.1 % of all responses). There is therefore not a significant degree of local opposition to the site's removal from the Green Belt and employment allocation.

The key issues raised by respondents relate principally to issues that have been addressed by NLP in its original 29 November 2013 representations and which were found to be acceptable in preparing the draft Local Plan i.e.: loss of Green Belt and the visual impacts of industrial development. Other matters including traffic, flood risk, noise and pollution impacts are capable of mitigation, would not have significant adverse impacts and would not outweigh the considerable economic and employment benefits. Importantly, these are development management matters which it would be appropriate to consider at the planning application stage; we have addressed them in our representations and above to the extent that is appropriate at this plan-making stage.

The site would be a highly sustainable extension to Guildford's foremost strategic employment site, which is a thriving business area with high demand and a very low vacancy rate (only 185 sq.m was vacant in 2015 according to the ELNA). The delivery of additional employment floorspace within the Borough would provide both local businesses and new incoming entrants with a greater level of choice in commercial premises. This would enable businesses, including SMEs, to relocate and grow more easily, and would contribute to the improved flexibility and competitiveness of the local business base. Meeting local demand for employment floorspace in a highly strategic business location like the SIE would assist in stimulating employment creation and economic growth within Guildford Borough.

In addition, the allocation of the site for employment purposes, accommodating growing businesses in the local market, could in some cases release previously developed employment sites within urban areas for housing provision. The release of urban sites for new housing development supports the Town Centre Vision for Guildford, which seeks to increase the provision of housing in the town centre area. Supporting housing delivery within urban sites would also help ease pressure on the release of Green Belt land.

In addition, the allocation could help to unlock the SARP by relocating some of the existing or proposed employment uses at SARP to the extended SIE. This would allow a higher proportion of



housing to be delivered within the SARP boundary, and would ultimately increase the potential development value of the regeneration project.

While the draft Local Plan identifies a number of sites for potential employment development across the Borough, few of these sites would be delivered within the short term (i.e. over the next five years). In contrast, Site 63 is readily available for development over the next five years, with co-operative landowners and good quality infrastructure supporting delivery. The risk profile associated with the allocated site is therefore low.

The impacts that would arise (addressed in our representations and above) can be mitigated and are heavily outweighed by the considerable positive impacts that would result to the economy in the short term.

For these reasons, the site should be removed from the Green Belt and be allocated in the Guildford Local Plan for employment development within Classes B1c, B2 and B8.

Please contact me or Steven Butterworth if you wish to discuss any of the matters we have addressed.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'B. Hodges', with a horizontal line underneath.

Brendan Hodges
Associate Director

Copy:

Hubert Ashton – Cassidy Slyfield Ltd
Mr and Mrs Mostyn

Enclosures:

1. Site 63 Location Plan
2. Definitive Footpaths
3. Previous Representations Submitted on Behalf of Cassidy Slyfield Ltd and Mr and Mrs Mostyn (full set provided with email letter. Executive Summary only with hard copy)



Enclosure 1: Site 63 Location Plan



1. Cassidy Slyfield Ltd
2. Mr and Mrs Mostyn



Enclosure 2: Definitive Footpaths



KEY

Site 1



Site 2



Definitive Public Footpaths



Roads owned by Cassidy Styfield Ltd



Potential Vehicle Access



Project Land North of Styfield Industrial Estate

Title Figure 2: Access and Public Footpaths Plan

Client Cassidy Styfield Ltd

Date November 2013

Scale NTS

Drawn by AJH

Dwg No IL13719019



Based upon Ordnance Survey mapping with the permission of Her Majesty's Stationery Office. © Crown Copyright Material. Licence number 100019414



Nathaniel Lichfield
& Partners

Planning. Design. Economics.

Annex 7

Letters and Photographs to Councillors Dated 6 and
24 May 2016

CASSIDY SLYFIELD LIMITED

C/O PEACHEY & CO LLP
95 ALDWYCH, LONDON WC2B 4JF

TEL: 020 7316 5200

Our Ref: HWA/45446/nf
Date: 06 May 2016

Cllr Paul Spooner
Leader
Guildford Borough Council
Millmead House
Millmead
Guildford
Surrey
GU2 4BB

*By Post and By Email:
paul.spooner@guildford.gov.uk*

Dear Cllr Spooner

Item 3, Proposed Submission Local Plan Special Meeting of the Executive, 11 May 2016

I am writing as a representative of two landowners, Cassidy Slyfield Limited and Mr and Mrs Mostyn. Both our company and Mr and Mrs Mostyn are promoting adjoining sites for employment use in the Slyfield Industrial Estate. I am requesting that one of our representatives is given the opportunity to speak on Item 3, Proposed Submission Local Plan, at the Special Meeting of the Executive on the 11 May.

Our site, which is shown in the attached map, and which is located within the ward of Worplesdon, was initially identified for employment uses in the earlier version of the draft Local Plan, but has now been withdrawn, we understand, on two grounds:

1. An assessment undertaken by GBC has shown the site is highly sensitive in landscape / Green Belt terms.
2. Employment uses (light and general industrial and warehousing) are now to be accommodated within the identified strategic / allocated sites at SARP, Wisley Airfield and Burnt Common.

I attach some photos of our site which is overshadowed by the large industrial buildings on Slyfield Industrial Estate. As you will see, it is difficult to understand how it can be deemed to have a lower landscape score than the Green Belt sites that continue to be supported by the Council. We would certainly like your officers to justify this decision at a public meeting. In our view, it seriously questions the validity and thoroughness of the Green Belt and Countryside Study undertaken by GBC and undermines the entire basis of the Council's justification of its site allocations.

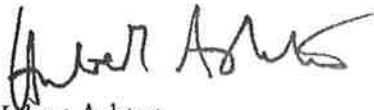
The withdrawal of our site will prevent the Slyfield Industrial Estate from expanding in the future. Industrial uses are more appropriately located at Slyfield where they would benefit from existing commercial infrastructure, linkages to other businesses and economies of scale; and not isolated at Wisley or Send. Our site would help facilitate the growth of the Slyfield estate, attracting existing businesses from other parts of Guildford and in the process freeing up brownfield sites within the town for residential development. This would have relieved some of the pressure to build on other Green Belt sites within the Borough.

We believe the decision to withdraw our site is a mistake for the Local Plan and the town. Furthermore, it will undermine GBC's case for securing transport and growth funding around the Slyfield area.

We would request that the Executive re-considers this element of the draft Local Plan and agrees that our sites should be allocated for the reasons set out above.

We are currently preparing a further briefing note that we intend to circulate to all members shortly. In the meantime, please do not hesitate to contact me if you would like to meet or discuss the issues set out in this letter.

Yours sincerely



Hubert Ashton
Director

Cc John Armstrong, Committee Secretariat
GBC Executive Members
Mr and Mrs Mostyn

CASSIDY SLYFIELD LIMITED

C/O PEACHEY & CO LLP
95 ALDWYCH, LONDON WC2B 4JF

TEL: 020 7316 5200

Our Ref: HWA/45446/nf
Date: 24 May 2016

To Councillors of Guildford Borough Council
Millmead House
Millmead
Guildford
Surrey
GU2 4BB

By Email Only

Dear Councillors

MEETING OF THE COUNCIL TODAY 24 MAY 2016 DRAFT LOCAL PLAN: BURNT COMMON/NORTH SLYFIELD SITE

I am writing on behalf of Cassidy Slyfield Limited. As you may be aware, we have been promoting the development of the North Slyfield Site, as an extension to the Slyfield Industrial Estate, for inclusion in the draft Local Plan.

The North Slyfield Site was included in the original draft Local Plan in 2014 but was unexpectedly withdrawn last month. In its place, the Council proposed a number of inappropriate locations for industrial uses. Partly due to the representations we have made, on 11 May 2016 the Council Executive agreed to withdraw one of these sites but replaced it with another inappropriate location – Burnt Common in Send/Ripley.

Attached are some photos of the North Slyfield Site which is overshadowed by the large industrial buildings on the Slyfield Industrial Estate. In contrast, part of the suggested site at Burnt Common is a 500 year old ancient woodland where it would be inappropriate to have industrial buildings. It is difficult to understand how that can be deemed to have a lower landscape score than the Green Belt sites that continue to be supported by the Council.

Industrial uses are more appropriately located at Slyfield where they would benefit from existing commercial infrastructure, linkages to other businesses and economies of scale; and not isolated at Wisley or Send. The North Slyfield Site would help facilitate the growth of the Slyfield Industrial Estate, attracting existing businesses from other parts of Guildford and in the process freeing up brownfield sites within the town for residential development. This would have relieved some of the pressure to build on other Green Belt sites within the Borough.

We believe the decision to withdraw the North Slyfield Site is a mistake for the Local Plan and the town. Furthermore, it will undermine GBC's case for securing transport and growth funding around the Slyfield area.

Cont'd./...

We would request that the Council re-considers this element of the draft Local Plan at its meeting later today by supporting the following amendment

That the industrial / warehousing allocation proposed at Garlick's Arch at Burnt Common is removed from the draft Local Plan and the North Slyfield site is re-instated for industrial / warehousing uses.

I do hope you will be able to support this change.

Thank you.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Hubert Ashton', written in a cursive style.

Hubert Ashton
Director

MOSTLY SITE COOKING SOUTH TOWARDS DENNIS





MOSTYN SITE LOOKING SOUTH TOWARDS DENNIS





SITE WEST OF DENNIS LOOKING SOUTH TOWARDS S.I.E.





Nathaniel Lichfield
& Partners
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Annex 8

Briefing Note to All GBC Councillors

Land North of Slyfield Industrial Estate (formerly Draft Local Plan Site No. 63)

Introduction

This Briefing has been prepared in advance of next Wednesday's (11 May) Special Meeting of the Executive to draw Members' attention to what we believe is a wrongful recommendation from Officers to remove an allocation for employment land in the Proposed Submission Local Plan. We urge Members to reinstate this allocation and provide the reasons for doing so here.

The North Slyfield Site

The 4ha site ('North Slyfield Site') is owned by (1) Cassidy Slyfield Ltd and (2) Mr and Mrs Mostyn, local Jacobs Well residents.

It adjoins Slyfield Industrial Estate (SIE) and also Slyfield Area Regeneration Project (SARP).

It is currently unused scrub land with a public footpath running along the eastern boundary linking Jacobs Well with SIE.

It is an excellent option for extending the Borough's premier industrial estate which is in high demand and has no real capacity to expand through intensification.



Allocation History

The Draft Local Plan: Strategy and Sites (July 2014) took the North Slyfield Site out of the Green Belt and allocated it as a sustainable extension to the industrial estate for "light

industrial (B1c) and / or general industrial (B2) and / or storage and distribution (B8)” uses (Site 63, see Appendix).

This was a sound, **evidence-based allocation** which should be carried forward in the Submission version of the draft Local Plan in order to contribute towards meeting the **need for additional employment land in the most sustainable and appropriate, strategic location**.

There were virtually no objections to the allocation and a number of responses in support, including from the Guildford Society.

We are very surprised to see that Officers have now changed their minds and instead are recommending reliance on employment allocations in the contentious strategic / Green Belt sites at Wisley Airfield in Ockham and Burnt Common in Send. Their stated reasons are that:

- there has been a reduction in the amount of additional employment land that is required since 2014; and
- *“the site was not identified [for development] in the Green Belt and Countryside Study and is located within high sensitivity Green Belt”¹.*

We address these matters below.

Employment Reasons for Allocation

The Council’s 2015 Employment Land Needs Assessment (ELNA) for Guildford estimates that up to 2033, an additional 4.7ha to 5.3ha of industrial / storage land is required.

This is low and inadequate to enable growth and, importantly, displacement of existing town centre businesses for housing development (eg. in and around Walnut Tree Close).

The Plan allocates inadequate land to meet this requirement - only up to 2.45 ha for Class B2 general industrial and Class B8 storage uses² at:

- Former Wisley Airfield, Ockham: Approximately 2,500 sq.m of employment (B2 / B8) (0.7 ha)
- Land around Burnt Common warehouse, Send: up to 7,000 sq.m of light industrial (B1c), general industrial (B2) and storage and distribution (B8) (1.75 ha)

This approach conflicts with:

- 1 The strong need for new employment sites in the Borough to meet the existing and forecast demand for new employment space (ELNA).

¹ [Item 03 \(14\) - 4C Comments on Site Allocations & Appendices & question responses, item 3](#)

² The employment allocation at SARP is for Class B1c light industrial and would not meet requirements for general industrial and storage operators.

- 2 Guildford Business Surveys which indicate that: one-third of businesses in the Borough are actively considering relocating, with most wishing to relocate within the Borough and relatively close to their current location; and *“industrial occupiers stated a preference for locating in Slyfield or a similar mid-urban industrial estate location”*³.
- 3 SIE currently has as little as 185sq.m of vacant industrial space, and no prospects for intensification or additional space at the estate⁴.

Therefore, **there is a strong and urgent need for additional employment land at the SIE in the short term to ensure the premier industrial location in the Borough does not miss prospects to attract new businesses and retain existing, growing businesses.**

The North Slyfield Site represents the **only location that can enable sustainable growth at the premier industrial estate in the short term.**

Green Belt Reasons for Allocation

The Site was not specifically assessed in the Council’s Green Belt and Countryside Study (2013) but formed 10% of a very large parcel of land referenced Land Parcel B3 (LP B3). LP B3 is too large (covering a bigger area than SIE) and varied in quality for any meaningful consideration to be given to the Green Belt boundaries around Jacobs Well and SIE. It includes within it a number of environmentally sensitive areas (i.e. River Wey floodplain, registered common land, SSSI, SPA, SAC and LNR); none of which apply to the North Slyfield Site.



The North Slyfield Site adjoins the SIE and is a suitable and sustainable location for development that could be built out in a manner that would not harm the Green Belt. Indeed, it shares many characteristics with the undeveloped, greenfield parts of the allocated SARP site, including thick, tree lined boundaries and low landscape quality scrubland to the interior.

³ ELNA, para 5.5.4

⁴ ELNA, Table 4.1



The Site interior and boundaries with SIE

Its release for employment development complies with NPPF purposes of Green Belt land⁵:

- 1 Jacobs Well and Guildford would remain **physically and visually separate**.
- 2 Development could be contained behind existing substantial boundary planting which, with limited enhancements, would **screen new development in public views and maintain the visual gap**.
- 3 Defensible boundaries prevent any further northward expansion of SIE and **safeguard the countryside** from further encroachment.
- 4 No impact on the character and appearance or setting of a historic town or conservation area.
- 5 Additional employment floorspace would assist **urban regeneration of the SIE** by strengthening its offer, role and attraction to businesses; and improve viability of SARP.
- 6 Businesses relocations on to an expanded SIE could release poorer quality brownfield sites for housing, which would **relieve Green Belt pressures elsewhere**.

⁵ Planning Assessment, and Landscape and Visual Assessment submitted on 29 November 2013 in response to Local Plan Issues and Options consultation.

Employment Allocation Comparisons – Why the North Slyfield Site is Preferable

The North Slyfield Site is a better option for additional employment floorspace and should be prioritised, with the allocation reinstated, for the following reasons:

SARP

- 1 The North Slyfield Site could meet the needs of a full range of Class B1c, B2 and B8 operators whereas the employment allocation at SARP is for Class B1c light industrial only.
- 2 As noted above, the undeveloped parts of SARP share landscape characteristics with the North Slyfield Site and qualitatively there is little difference between them. However, SARP is closer to the River Wey and sensitive landscape and nature designations, and could therefore be said to be more sensitive.
- 3 The North Slyfield Site is developable and deliverable now. While SARP is a good option for additional employment, relocation of the sewage treatment plant and viability issues have hindered the scheme to date.
- 4 Employment allocation of the North Slyfield Site could help unlock SARP by relocating some of the existing or proposed light industrial uses at SARP to the extended SIE. This would allow more housing to be delivered at SARP and boost development value. In addition, the growth of SIE through this allocation would reinforce the case for bringing forward the proposed Clay Lane Link Road.

Blackwell Farm, Hogs Back

This mixed use allocation includes approximately 31,000 sq.m of employment (B1) as a 10 – 11 ha extension to the Surrey Research Park. It would not accommodate the types of light industrial, industrial and warehousing uses existing and envisaged at SIE.

Wisley Airfield, Ockham

This mixed-use allocation includes approximately 2,500 sq.m of B2 (industrial) and B8 (warehouse) floorspace, requiring 0.7 ha of land to build out.

- 1 The North Slyfield Site benefits from existing commercial infrastructure, linkages to other businesses and economies of scale; the small development at Wisley would not, and could not meet the needs of existing businesses wishing to expand or relocate within the urban area or to Guildford's premier industrial location.
- 2 The North Slyfield Site is unconstrained by built and natural heritage and environmental constraints, unlike Wisley.
- 3 The North Slyfield Site benefits from existing natural boundary screening which would lessen the impacts of built development on the Green Belt / surrounding countryside; Wisley has no screening.

- 4 The North Slyfield Site is currently unused scrub; much of the Wisley allocation is currently farmed.
- 5 The North Slyfield Site could be delivered now; there are question marks over the delivery of Wisley and a mixed use scheme was recently refused.



© Google. Wisley Airfield – a predominately greenfield site with no existing buildings or boundary screening and with a number of natural and built environment constraints. Not to scale.

Burnt Common Warehouse, London Road, Send

This mixed-use allocation includes approximately 7,000 sq.m of B1(c) (light industrial), B2 (industrial) and B8 (warehouse) floorspace, requiring 1.75 ha of land to build out.

- 1 The North Slyfield Site benefits from existing commercial infrastructure, linkages to other businesses and economies of scale; the development at Burnt Oak would not and could not meet the needs of existing businesses wishing to expand or relocate to Guildford's premier industrial location.
- 2 The North Slyfield Site is set some distance from the houses on Jacobs Well Road and the existing boundary planting would attenuate noise; Burnt Oak is much closer to the residential properties to the west of the A247.
- 3 The North Slyfield Site is currently unused scrub; much of the Burnt Common land is currently farmed (Grade 3 – moderate to good).



© Google. Land around Burnt Common Warehouse, London Road, Send – a predominately greenfield site with a small part previously developed. Not to scale.

Green Belt Comparisons – Why the North Slyfield site is Preferable

The GBCS reviews land parcels against four NPPF Green Belt purposes and scores them. The following table extracts the GBCS scores and commentaries for the large LP B3, and also those for Wisley Airfield (LP C18) and Burnt Common (LP B13). LP B3 gets a high score of 4; however, the North Slyfield Site within it scores lower than any of the LPs and should be prioritised.

Land Parcel / Site	Purpose 1 To check the unrestricted sprawl of large built up areas	Purpose 2 To prevent neighbouring towns from merging into one another	Purpose 3 To assist in safeguarding the countryside from encroachment	Purpose 4 To preserve the setting and special character of towns	Overall Score
The North Slyfield Site	Checks northward sprawl of SIE	Does not prevent neighbouring settlements from merging	Defensible boundaries prevent any further encroachment into countryside	Does not preserve the setting and special character of an historic town	1
B3⁶	Checks northward sprawl of Guildford and eastward sprawl of Jacobs Well	Prevents Guildford and Jacobs Well from merging	Assists in safeguarding the countryside from encroachment by development on Clay Lane and Jacobs Well Road	Preserves setting of River Wey conservation area	4
C18⁷	Does not check sprawl of built up area	Does not prevent neighbouring settlements from merging	Assists in safeguarding the countryside from encroachment	Preserves the setting of Ockham Conservation Area	2
B13⁸	Checks westward sprawl of Send Marsh / Burntcommon	Prevents neighbouring settlements from merging	Assists in safeguarding the countryside from encroachment	Does not preserve the setting and special character of an historic town	3

Colours denote Green belt Sensitivity – Red = high; yellow = medium; green = low

Conclusions

The North Slyfield Site is not a sensitive part of the Green Belt and was the only industrial / warehousing allocation which supported the industrial market in the Guildford Urban Area. Its allocation for employment would help to meet the requirements of relocating and expanding businesses in the Borough at the premier industrial location, and help to release previously developed sites elsewhere for housing.

We urge Members to reinstate the employment allocation at the North Slyfield Site.

⁶ B3 includes The Site

⁷ C18 includes former Wisley Airfield

⁸ B13 Burnt Common Warehouse

Appendix: Draft Local Plan (July 2014) Allocation for Site 63

63	Land north of Slyfield Industrial Estate
Site address	Land north of Slyfield industrial estate, Guildford
Location	Guildford Urban Area
Ward	Stoke

Site maps



Ownership	Private
Area (size)	4 ha
Existing use	Undeveloped land
How was the site identified?	ELA
Considerations	<ul style="list-style-type: none"> • Currently Green Belt • Greenfield site • Flood zone 1 (low risk) • Within 400m to 5km of the Thames Basin Heaths SPA, where the impact of development can be avoided • Adjacent to strategic employment site






Allocation	Employment uses: Light industrial (B1c) and/or general industrial (B2) and/or storage and distribution (B8)
Timescales	1-5 years
Opportunities /commentary	The site will become part of the Slyfield Industrial Estate and as such will be part of the strategic employment site.

Appendix C: Key Maps

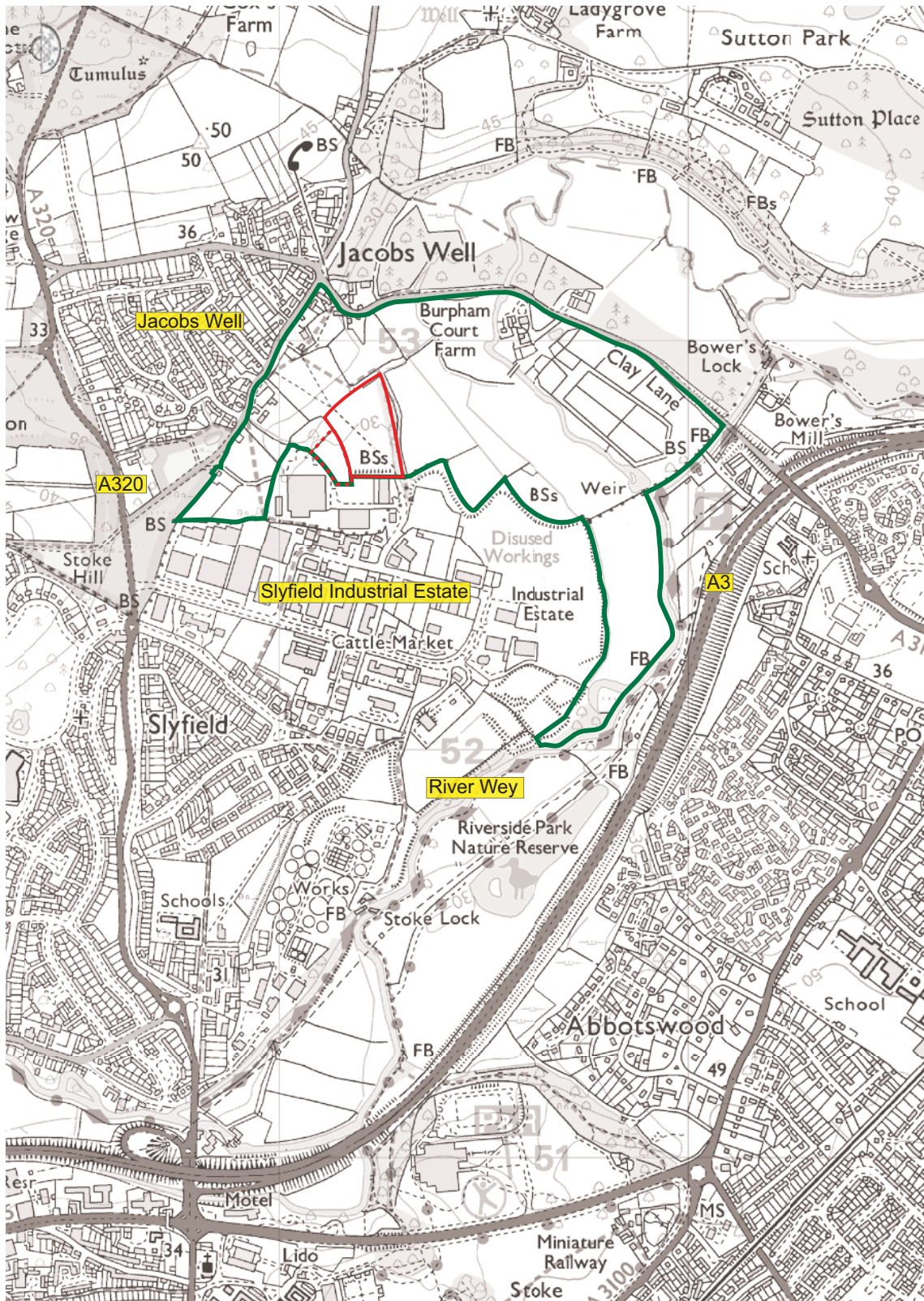




KEY

- Site 1 
- Site 2 
- Definitive Public Footpaths 
- Roads owned by Cassidy Slyfield Ltd 
- Potential Vehicle Access 





KEY

Site 1



Site 2



Land Parcel B3



nlp Nathaniel Lichfield & Partners
 Planning, Design, Economics.

Project Land North of Slyfield Industrial Estate

Title **Figure 7: Green Belt and Countryside Study Land Parcel B3**

Client Cassidy Slyfield Ltd

Date November 2013

Scale NTS

Drawn by AH

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