

## EXAMINATION OF THE GUILDFORD BOROUGH LOCAL PLAN: STRATEGY AND SITES

---

### EXAMINATION STATEMENT ON BEHALF OF BEWLEY HOMES PLC

*Matter 9 – Spatial Strategy, Green Belt and Countryside Protection*  
*Matter 11 – Policy A29 – Land South and East of Ash and Tongham*

*Prepared by:*

*David Neame BSc (Hons) MSc MRTPI*  
*Director – Neame Sutton Limited*

May 2018

## EXAMINATION STATEMENT ON BEHALF OF BEWLEY HOMES PLC

*Matter 9 – Spatial Strategy, Green Belt and Countryside Protection*  
*Matter 11 – Policy A29 – Land South and East of Ash and Tongham*

10 May 2018

### CONTENTS

---

<b><u>Section:</u></b>		<b><u>Page:</u></b>
<b>1.0</b>	<b>Introduction</b>	<b>4</b>
<b>2.0</b>	<b>Matter 9 – Spatial Strategy, Green Belt and Countryside Protection</b>	<b>4</b>
	(i) Is the spatial strategy as set out in the preamble to Policy S2 sufficient to explain the plan's approach to the overall distribution of development and guide future development during the plan period?	4
	(ii) Having regard to the extent to which it is proposed to release Green Belt land and develop greenfield sites, do the plan's policies strike the right balance (in terms of housing provision) between the use of urban and previously developed land and urban extensions? Has the potential for further residential development in the urban area been adequately explored?	5
	(iii) Having regard to 9.2 to 9.4 above, are the overall amount of land proposed to be released from the Green Belt, and the strategic locations for Green Belt release, justified by exceptional circumstances?	5
	(iv) If the Plan had to accommodate a greater housing requirement, for example through a higher OAN, what would be the implications in terms of the spatial strategy?	6
	(v) What are the reasons that have led the Council to propose including new land in the Green Belt around Ash and Tongham, and can the circumstances be regarded as exceptional? What are the implications for the future housing needs of this Urban Area?	6
<b>3.0</b>	<b>Matter 11 – Policy A29 – Land South and East of Ash and Tongham</b>	<b>7</b>
	(i) How would road traffic be handled from these sites, especially having regard to the railway line and the narrow lanes and streets?	7
	(ii) Are the site allocations too large or is there scope for a greater number of new homes in this location, being land beyond the Green Belt?	8
	(iii) Having regard to the different areas and land parcels involved in this allocation, should the plan say more about protecting and enhancing the character of the existing Ash and Tongham	

urban area and Ash Green villages and creating attractive and  
cohesive settlement(s)

9

**4.0 Changes Sought**

**11**

**Appendices:**

**Appendix 1** Plan detailing the extent of sites consented, subject to applications and, the land remaining within the Ash and Tongham Allocation (Policy A29)

**Appendix 2** Report on highway matters prepared by i-Transport – May 2018

## EXAMINATION STATEMENT ON BEHALF OF BEWLEY HOMES PLC

*Matter 9 – Spatial Strategy, Green Belt and Countryside Protection  
Matter 11 – Policy A29 – Land South and East of Ash and Tongham*

10 May 2018

---

### 1.0 Introduction

- 1.1 This Examination Statement provides a response on behalf of Bewley Homes Plc ("Bewley Homes"), to those Questions raised by the Inspector (dated 20 April 2018), relating to the Spatial Strategy (Matter 9) and Site Allocations specifically Policy A29 (Matter 11) contained within Guildford Borough Local Plan: Strategy and Sites ("the Plan") and its supporting evidence base.
- 1.2 In addition to the above, this Statement specifically highlights which areas of the Plan are considered to be unsound, and the basis upon which it fails the tests of soundness, and the changes sought.

### 2.0 Matter 9 – Spatial Strategy, Green Belt and Countryside Protection

(i) *Is the spatial strategy as set out in the preamble to Policy S2 sufficient to explain the plan's approach to the overall distribution of development and guide future development during the plan period?*

- 2.1 Bewley Homes is concerned that there is an apparent contradiction between the spatial strategy and spatial vision set out in the Plan. The latter advises that the Council is seeking to meet the community needs in terms of housing, yet the former confirms the Council's decision to constrain and reduce the level of housing provided in the Plan.
- 2.2 The draft modification set out in the Council's answer to the Inspector's Question 4 (GBC-LPSS-001) provides a breakdown of the housing delivery the Council envisages across the Borough as per its spatial strategy. In Bewley Homes view the general approach in terms of releasing greenfield and Green Belt sites in sustainable locations is appropriate, however, the strategy fails to meet the needs of the community in terms of housing<sup>1</sup> and therefore remains at odds with the vision set out in the Plan.

---

<sup>1</sup> See Guildford Housing Forum – Matters 2, 3, 4 and 5 Statements

2.3 The consequence of the Council's current approach is a Plan that will result in worsening affordability over the Plan period and an ever increasing affordable housing need, which is in conflict with Government policy set out in the Framework and NPPG. The Plan is not positively prepared in this regard.

*(ii) Having regard to the extent to which it is proposed to release Green Belt land and develop greenfield sites, do the plan's policies strike the right balance (in terms of housing provision) between the use of urban and previously developed land and urban extensions? Has the potential for further residential development in the urban area been adequately explored?*

2.4 Whilst Bewley Homes has not undertaken a detailed analysis of the capacity of the urban areas to accommodate additional growth it is considered that the Council should not seek to rely on further previously-developed sites coming forward that are currently in active and viable employment uses.

2.5 The key reason for this is the importance of maintaining a balance between housing and employment across the Borough and in the context of employment land the provision of a range of employment floorspace opportunities, such as those sites already situated within urban areas, if of vital importance. There are indeed a number of locations that the Council seek to rely on now, for example in the Ash and Tongham urban area, that may well be more appropriate to retain in active employment use rather than relied upon for housing delivery.

*(iii) Having regard to 9.2 to 9.4 above, are the overall amount of land proposed to be released from the Green Belt, and the strategic locations for Green Belt release, justified by exceptional circumstances?*

2.6 In Bewley Homes' view the approach to the release of Green Belt land in Guildford is justified by exceptional circumstances. As the Plan confirms 89% of the Borough is within the Green Belt<sup>2</sup>. The Borough is also one of the least affordable local authority areas in the Country outside of London with extremely high housing need. Additionally there is further unmet need arising from elsewhere in the HMA<sup>3</sup>. Finally the Council has not undertaken a review of its Green Belt boundaries for in excess of 14 years<sup>4</sup>.

2.7 The requirements of Paragraphs 83 – 85 of the Framework are therefore met in principle by the approach being taken by the Council to release sites from the Green Belt to meet the overwhelming housing needs of the Borough's community.

---

<sup>2</sup> Regulation 19 Local Plan – Paragraph 2.23

<sup>3</sup> 1,575 dwellings arising from Woking (50% of its unmet need)

<sup>4</sup> Based on the fact that the previous Local Plan was adopted in 2003

*(iv) If the Plan had to accommodate a greater housing requirement, for example through a higher OAN, what would be the implications in terms of the spatial strategy?*

2.8 In short the strategy would remain unchanged. The Council would need to identify and allocate further land, including from within the Green Belt.

2.9 As set out above Bewley Homes would not support the development of further active and viable employment sites in order to meet the additional requirement.

2.10 A number of potential location options exist that the Council could explore to provide further housing to meet any increased requirement:

Option 1 – Sites not yet identified from within urban areas (taking into account the caveat at Paragraph 2.9 above);

Option 2 – Review of the existing allocations in terms of increased capacity – with particular emphasis on Ash and Tongham (see Section 3 below);

Option 3 – Review of small to medium greenfield sites within the Green Belt that could be released to help the Council in the early years of the Plan period. Bewley Homes' representations identify two such locations at Effingham and West Horsley where the objective assessment presented confirms their release would not harm the objectives of the Green Belt; and,

Option 4 – Full review of PDL options in the Green Belt. The Council has assembled a Brownfield Sites Register that includes viable housing site options not currently included in the Green Belt PDL line entry in the housing trajectory. Therefore further potential exists from this source. Bewley Homes has identified one such location at Woodstreet Village in its representations that could be delivered in the early years of the Plan period.

*(v) What are the reasons that have led the Council to propose including new land in the Green Belt around Ash and Tongham, and can the circumstances be regarded as exceptional? What are the implications for the future housing needs of this Urban Area?*

2.11 Bewley Homes is of the view that the Council has no sound justification for the additional Green Belt land proposed around Ash and Tongham. The circumstances presented by the Council in its response to the Inspector's Questions<sup>5</sup> are not exceptional. Neither is the information contained in the December 2017 Topic Paper. In fact the approach being taken would serve to constrain the only area in the Borough that is currently able to expand outside of the Green Belt in a sustainable manner.

<sup>5</sup> Paragraph 8.41 – 8.44 – GBC-LPSS-001

- 2.12 The objective that the Council is seeking in this location can be easily secured via a settlement policy boundary and does not necessitate an extension to the Green Belt.
- 2.13 The approach that Guildford is seeking to take is not dissimilar to that proposed by Waverley in its Regulation 19 Local Plan Part 1, which the Inspector concluded was not warranted and Waverley subsequently proposed modifications to delete.
- 2.14 The practical implication of a Green Belt extension in this location is that any future housing needs for this Urban Area (being the largest urban area outside of Guildford) would be constrained by the requirement to undertake a future Green Belt review. This cannot be a correct approach to take bearing in mind the long term nature and permanence of Green Belt<sup>6</sup>. Given the sustainability credentials of the Ash and Tongham Urban Area and the current and future demand for housing in the HMA, which will clearly remain high given the current affordability crisis, the Council should not be adding to the Green Belt in this location without clear justification.

### **3.0 Matter 11 – Policy A29 – Land South and East of Ash and Tongham**

*(i) How would road traffic be handled from these sites, especially having regard to the railway line and the narrow lanes and streets?*

- 3.1 Bewley Homes' highway consultant i-Transport has prepared a report dealing specifically with this issue (see Appendix 2). The i-Transport report confirms that:
1. The traffic impact work undertaken for the recent land south of Ash Lodge Drive planning application has been agreed with SCC. This assessment allows for the cumulative impact of 1,701 dwellings within the allocation and, 1,912 dwellings overall in the local area. SCC is satisfied with the cumulative traffic impacts of that level of development and is not requesting financial contributions towards a new rail bridge, and/or measures to deal with the alleged 'narrow lanes' in the area.
  2. Notwithstanding these two matters, local concern regarding the operation of the Ash level crossing is acknowledged – it is perhaps desirable for it to be replaced by a bridge and the current shortfall in funding could be made up by contributions from development in the local area. In that case:
    - Replacing the level crossing with a bridge should unlock a constraint to the operation of the local highway network and, additional development above the 1,750 dwellings currently proposed by the policy will be appropriate; and,

---

<sup>6</sup> Paragraph 83 of the Framework

- Increasing the number of dwellings allocated in the area will reduce the financial burden per dwelling, thereby enabling a greater level of funding for other transport schemes e.g. junction improvements and measures to encourage the use of sustainable modes.

3.2 In short the current allocation at Ash and Tongham does not require the new railway bridge to come forward. The area does have capacity for further growth (as identified below) and on that basis a bridge would be desirable to enable further delivery above the 1,750 dwelling allocation to take place.

3.3 In either case road traffic is not a constraint to delivery of housing in this allocation and from sources identified in the urban area.

*(ii) Are the site allocations too large or is there scope for a greater number of new homes in this location, being land beyond the Green Belt?*

3.4 In short no. Whilst it is acknowledged that Policy A29 covers a large area (see attached plan in Appendix 1) a significant proportion of that area already benefits from Planning Consent (986 dwellings) with further sites the subject of pending applications. Assuming the pending application are consented (some of which will replace extant consents) the total would equate to 1,229 dwellings leaving only 521 dwellings remaining.

3.5 Neame Sutton has explored the potential for the remaining allocation area to accommodate further growth beyond the 1,750 dwellings identified in Policy A29. Based on the average density of all dwellings consented thus far in the allocation (19.5 dpha) the remaining allocation area (as illustrated on the plan attached at Appendix 1) could yield at least an additional 130 dwellings. If a higher density of 25 dpha was to be considered then this area has the potential to yield another 300 dwellings.

3.6 In addition there are areas of land around Ash and Tongham that the Council currently proposes for inclusion in the Green Belt, which could deliver further housing in a sustainable manner if required.

3.7 Bewley Homes' notes the Statement prepared by Judith Ashton on behalf of A2Dominion and agrees with the analysis that increased densities in this area need not result in a commensurate increase in pressure on local services or indeed severe impact on the highway network.

3.8 It is also agreed that higher densities in this location would increase the scope for Planning Obligations and/or CIL to help in the delivery of early infrastructure and in particular the Council's desire to provide a bridge over the railway at Ash station.



3.9 It is therefore concluded that there is scope for a greater number of new dwellings in this location, through both increased densities and the increase in the allocation area.

(iii) *Having regard to the different areas and land parcels involved in this allocation, should the plan say more about protecting and enhancing the character of the existing Ash and Tongham urban area and Ash Green villages and creating attractive and cohesive settlement(s)*

3.10 Bewley Homes is particularly concerned by the Council's late amendments to the wording of Policy A29 set out in the schedule of Minor Modifications to the Submission version Local Plan<sup>7</sup>.

3.11 Bewley Homes' landscape architect Tyler Grange has examined the evidence base that underpins the policy and in particular the minor modifications made and this section of the statement therefore draws on the advice provided by Tyler Grange.

3.12 The SA confirms in a number of locations regarding landscape and the strategic objective relating to the conservation and enhancement of landscape character that significant positive effects will result from the allocation<sup>8</sup>. The SA from both 2016 and 2017 covers the landscape issues associated with the allocation as a whole, which is correct. The document rightly does not drill down to individual parcels of land within the proposed allocation.

3.13 Despite this the Council's proposed minor modifications seek to introduce two requirements that, as explained below, cannot be complied with or are site-specific to a particular parcel of the allocation, unsupported by the evidence and in particular the SA.

3.14 The first point, which cannot possibly be complied with and is therefore unreasonable is requirement 6. The wording of the requirement as modified currently states:

*'The properties along Ash Green Road ~~have historically been considered to form part of Ash Green village. Whilst this land is now proposed to be included within the Ash and Tongham urban area.~~ Proposals for the land west of this road must ~~should~~ **must** respect the historical context of this area **by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape.** This ~~should~~ **must** include the provision of a green buffer that ~~seeks to maintain a sense of separation between the~~ **any** proposed new development and the properties fronting onto Ash Green Road. This will also help soften the edges of the strategic development location and provide a transition between the built-up area and the countryside beyond.'*

---

<sup>7</sup> GBC-LPSS-CD-003

<sup>8</sup> SA – June 2016 – Paragraphs 10.11.4 and 10.11.10 and SA – June 2017 – Paragraphs 10.11.12 – 10.11.14

- 3.15 Of particular concern is the wording 'Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape.' Put simply this is a physical impossibility. Development will by its very nature detract from the character of the rural landscape as the whole allocation is intended to become settlement, there is a loss of the rural landscape in this area to minimise losses in more sensitive locations. This sentence directly contradicts the objective of the housing allocation.
- 3.16 Furthermore the Council or Planning Inspectorate on Appeal has already granted consent for 986 dwellings in this location clearly accepting the change that will occur to the landscape and the SA supports the approach. This sentence must therefore be deleted from the policy.
- 3.17 As a subsidiary point the wording of the policy requires a green buffer to maintain separation particularly in relation to those properties fronting Ash Green Road. That wording is fine. The wording does however conflict with the earlier requirement to prevent coalescence of Ash and Ash Green. The practical affect of Policy A29 and Policy A28 will be for Ash and Ash Green to become one settlement on the proposals map (see Plan attached at Appendix 1). The Council accept this and its SA confirms the acceptability of this approach. Reference to preventing coalescence should also be removed from the policy.
- 3.18 The second point concerns requirement 8 in the policy that as currently worded states:
- 'Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.'*
- 3.19 The wording added to the policy by the Council (in red) is not supported by the evidence base and is site-specific to land surrounding Ash Manor. This is a direct contraction to the approach taken in the rest of the Policy that deals with the A29 area as a whole and is supported by the SA.
- 3.20 Furthermore the additional wording is not supported when looking at the merits of the Ash Manor site itself for the following reasons:
- 3.20.1 Reason 1 – The policy assumes there are views to the heritage asset (Ash Manor complex) from White Lane currently. This is not the case;
- 3.20.2 Reason 2 – The wording assumes that the approach to the heritage asset has always been from White Lane. This is not correct. Bewley Homes' heritage consultant (Malcolm A Cooper Consulting) has confirmed from the historic mapping of the area that the access contemporary to the heritage asset was from the other direction. The White Lane access was only added and later relied upon following the

construction of the railway. The Council has been provided with this evidence in the context of ongoing pre-application discussions on the site; and,

- 3.20.3 Reason 3 – The policy wording assumes that the heritage asset was designed to be viewed from White Lane. This is not correct. Ash Manor (the key heritage asset in the complex, which is Grade II\* Listed) is orientated to face north towards the railway and not south towards White Lane.
- 3.21 The sentence added to the policy by the Council is completely unsubstantiated by any credible evidence and if retained will serve to constrain delivery on a key part of the current A29 Allocation that the Council's Development Management team confirm is readily capable of accommodating residential development without harm to the significance of the heritage assets.
- 3.22 The sentence must therefore be deleted.

#### 4.0 Changes Sought

4.1 Bewley Homes seeks the following changes to the Plan:

1. In the context of the evidence presented by the Guildford Housing Forum on OAN, Unmet Need, Housing Trajectory and 5-Year Housing Land Supply the Council should review its supply sources with particular emphasis on those small to medium sized sites in the Green Belt that could be released to deliver early in the Plan period, PDL sites on the Brownfield Site Register not accounted for in the current trajectory, increased capacity from the Ash and Tongham Urban Area;
2. The following specific amendments to the wording of Policy A29:

Amend Requirement 6 as follows:

*'The properties along Ash Green Road ~~have historically been considered to form part of Ash Green village. Whilst this land is now proposed to be included within the Ash and Tongham urban area.~~ Proposals for the land west of this road must ~~should~~ **must** respect the historical context of this area **by preventing the coalescence of Ash and Tongham ~~and Ash Green.~~** **Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape.** This ~~should~~ **must** include the provision of a green buffer that ~~seeks to maintain~~ **a sense of separation between the any proposed new development and the properties fronting onto Ash Green Road. This will also help soften the edges of the strategic development location and provide a transition between the built-up area and the countryside beyond.'***

Amend Requirement 8 as follows:

*'Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. ~~Views to and from this heritage asset, including their approach from White Lane, must be protected.~~'*

---