

PLANIT CONSULTING
TOWN PLANNING & PROPERTY ADVISERS

3 Innovation Place
Douglas Drive
Godalming
Surrey
GU7 1JX
01483 415753

Mr J Bore
C/O Chris Banks
Banks Solutions
64 Lavina Way
East Preston
West Sussex
BN16 1EF

10 May 2018

Dear Sir,

Re: Hearing Statement – Crownhall Estates

Examination into the soundness Of The Guildford Borough Local Plan: Strategy And Sites

Matters and Issues: 9. Spatial Strategy, Green Belt and Countryside Protection

This hearing statement has been prepared on behalf of Crownhall Estates in relation to the soundness and legal compliance of the Guildford Borough Local Plan: Strategy and Sites.

This statement relates specifically to Matter 9: Spatial Strategy, Green Belt and Countryside Protection and responds to the issues and questions identified by the Inspector in Document ID/3 where relevant to our client.

A request to attend the hearing session on Matter 9 has already been made during which further information can be provided to inform the Inspector as necessary.

9. Spatial Strategy, Green Belt and Countryside Protection

The Plan adopts a strategic approach that at the broad level is in line with national planning policy i.e. town centre first, then urban areas, then inset villages then identified villages.

It is clear, however, that the borough's development needs cannot all be met within town centre, urban areas or areas outside of the Green Belt designation and that the borough is heavily constrained by Green Belt.

Land will therefore have to be released from the Green Belt to meet Objectively Assessed Need (OAN) this need and lack of alternatives is the exceptional circumstance that we consider justifies alterations to the Green Belt boundaries and Green Belt release.

The inseting of villages

In relation to village inseting, we consider the plan takes a sound approach, including the proposed extension to those villages inset from the Green Belt.

The inseting of villages provides an opportunity accommodate development in locationally sustainable areas that have been assessed as not making an important contribution to the openness of the Green Belt. Development can then come forward without having to adhere to the requirements of 'appropriate development' which would limit the amount of development that could take place if the villages were not inset.

Send

With specific regard to Send, we support the proposed boundary review. The proposed Green Belt boundary follows the form of the village and sensibly proposes the inclusion of land at Send Hill (to the west of Sandfields). This would allow for development of a site that clearly forms part of the built up part of the village, sitting squarely between two areas of medium density development, without impacting on the openness or purposes of the Green Belt. It is therefore suitable, deliverable and available and will help meet need in the first five years.

Send Marsh / Burnt Common (A43 and A43A)

We also support the proposed review to the Green Belt boundary at Send Marsh, to incorporate land at Burnt Common, including the proposed allocations A43 and A43A. This includes land at Oldlands which is a freestanding component of 1.35 hectares which sits within the proposed allocation, adjacent to established residential development on the western side of Burnt Common Lane.

A43 is enclosed on all sides by existing development, with existing roads and residential development creating a fixed boundary and a well-contained area for development. It will therefore allow for a significant level of development without significantly compromising the openness and purposes of the Green Belt.

In this regard, we consider the Plan to be justified as the enlargement and inseting of villages proposes an appropriate strategy to meeting identified housing need in areas, which are suitable for development.

Land at Little Flexford, Normandy (A47)

We do not, however, consider the Plan sound as it relates to Land at Little Flexford. While it is understood that time will not be given to omission sites in the hearing, the decision exclude the above calls into question the soundness of the plan, specifically whether the Plan puts forward the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence.

Little Flexford was originally proposed as an allocation for 50 dwellings in the 2016 Draft Local Plan (A47). This took into consideration the findings in the Green Belt and Countryside Study 2014 that identified the site as a potential development area (reference H11-D), providing an opportunity to accommodate development without significantly compromising the purposes of the Green Belt.

The site, however, is locally designated as a Site of Nature Conservation Importance (SNCI). It was designated in 1995 for it's:

'Semi-improved grassland and stream supporting locally scare plant species and Water Voles'.

It has since been omitted from the Plan on the basis that the semi-improved grassland habitat is not compatible with development and that the site is still worthy of its SNCI status.

In coming to this conclusion, however, GBC has had no regard to evidence in relation to the SNCI, specifically Surrey Wildlife Trust's (SWT) survey report which finds the condition of the site as 'unfavorable declining'. The result is that a site, which the Council's Green Belt and Countryside Study identifies as being of low sensitivity in Green Belt terms, and which is locationally sustainable as a result of its proximity to Wanborough Station and other services and facilities, has been excluded.

It is therefore considered that the Plan does not put forward the most appropriate strategy as regards the potential for development in Flexford, as the evidence demonstrates that this site is a reasonable and perhaps favourable alternative (not being in the AONB/AGLV and performing a low Green Belt function), that has been excluded on spurious, and factually questionable grounds.

To demonstrate the above the following evidence is submitted:

Extracts from Pegasus's Guildford Borough Green Belt and Countryside Study

The site was reviewed as part of this study and identified as a Potential Development Area (reference H11-D)

In coming to this conclusion the GBCS found that while this area assists in checking the eastward sprawl of Flexford, it does not prevent towns from merging, assist in safeguarding the countryside from encroachment or preserve the setting and special

character of historic towns. As such, it scored 1 out of 4 in terms of meeting the purposes of the Green Belt and was found to be of low sensitivity.

The conclusion was thus that this area provides an opportunity to accommodate development without significantly compromising the purposes of the Green Belt. It did, however, identify ecology as a potential significant constraint that would need to be addressed with respect to any proposed development.

It is understood that appendices should not be included from any publication that is already before the examination. The Inspector is therefore referred to the relevant sections of the Pegasus Guildford Borough Green Belt and Countryside Study which can be found at:

- Volume II Addendum: Appendix 1: Green Belt Purposes Schedule (page 19 based on online numbering)
- Volume II Addendum: Appendix 2: Green Belt Sensitivity Map
- Volume III: Chapter 12: Conculsions (pages 14 and 15)
- Volume III: Page 48: Flexford Land Parcels and Potential Development Areas
- Volume III: Environmental Capacity Analysis (pages 51 – 54 based on online numbering)

Surrey Wildlife Trust (SWT) – Guildford Borough SNCI Survey 2016

As noted above the site was omitted from the Plan as, on the back of the SWT survey, the Council concluded the site still worthy of its SNCI status.

The survey found that the:

‘site still supports the semi-improved mesotrophic grassland and stream which still supports locally rare plant species’ but that ‘no sights of water voles were found during the survey and surveys north and south of Little Flexford in 2016 have also yielded no Water Vole signs’.

It goes on to report that due to overgrazing in the winter:

‘Whilst the reason for selection as an SNCI remains with regard to the criteria for the habitat and scarce plant population, the fields are being heavily poached during the winter. It is therefore likely that the continuing trend of increased coarse grasses and weedy plants will continue’

The report goes on to say that:

‘Come the summer there were a good number of grassland indicators present and that the poaching did not necessarily have a negative effect.....(however) the over poaching cannot be sustained as it will inevitably lead to the continued increase in coarse grasses and herbs...’.

'Neutral grassland requires active management in order to retain its conservation interest. Without management, tall vigorous grasses will dominate and dead plant matter will accumulate. This will suppress the less vigorous species and the botanical diversity of the grassland will decrease'.

As a result, the site condition is concluded by SWT to be **'unfavourable declining'**

This document forms part of the evidence base and can be found via the Council's website at:

<http://www.guildford.gov.uk/newlocalplan/CHttpHandler.ashx?id=25011&p=0>

ACD Environmental Statement and rebuttal to SWT's assessment

This concludes that if left in its current use both SNCI features risk future damage. The field is currently used for horse grazing which by its nature is uncontrolled and there is no active management of the site. If the site continues to be grazed, which is likely if it remains undeveloped, further damage is inevitable leading to a continued decline in species diversity as the fields and their ecological value continue to degrade.

The end result is that if the continuing trend of coarse grasses and weedy plants continues, it is reasonably likely that the SNCI status will not be considered worthy of retention (if indeed it is at present given the unfavorable decline of the grasses and the 'likely functional water vole extinction' in Surrey).

Development therefore offers an opportunity for the features to be retained, protected and the ecological value enhanced with appropriate management secured as part of any forthcoming scheme that would assist in halting the continuing decline before irreversible damage occurs.

This document is not already before the examination and is attached at Appendix 1.

Conclusion on Little Flexford

It is therefore considered that the Plan does not put forward the most appropriate strategy, as it is evident that GBC has had no regard to the available evidence in relation to the SNCI in deciding to omit this site. This calls into question whether the plan is justified in terms of the strategy proposed as proportionate evidence indicates that more locationally preferable sites with lesser impact on the countryside / Green Belt may be available.

As already noted, Green Belt boundaries will need to be revised to meet the OAN given that 89% of the borough is Green Belt. This site has been found to be of low sensitivity in Green Belt terms. It also falls outside the AONB / AGLV and is in a sustainable location, bordering an existing settlement and being in close walking distance to Wanborough Station (0.2 miles), bus stops along Glaziers Lane (0.3 miles) and the KITE bus service which runs every 15min between Guildford and Aldershot

from Guildford Road (1 mile). There is also a pre-school, village hall, recreation ground with children's playground and GP surgery within 1.2 miles of the site.

Further evidence is currently being prepared with regard to the biodiversity value of the SNCI in the form of additional survey work. This will provide up-to-date evidence to demonstrate the status of the SNCI and its declining condition. Given the importance of surveying at the correct time of year, it has not been possible to submit this evidence with this hearing statement and I trust that this will be accepted in due course.

A Green Belt and Landscape Character Assessment is also being prepared to assess whether sites which would have a greater impact on the openness and purposes of the Green Belt and landscape character are being put forward over sites with lesser impact which have been removed on unjustified grounds i.e. whether in relation to Green Belt release, the Plan puts forward 'the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence' as we are concerned that, with regard to Green Belt and landscape impact, the Plan may not be directing housing development strategically to the right places (Matters 9.2 and 9.7).

Other comments

In considering the soundness of the Plan a comment is also made in relation to whether it is effective i.e. deliverable over its period.

In the Draft Local Plan 2016 Site A47 was put forward for 50 dwellings.

A planning application for the erection of 25 dwellings at the site has recently been refused, in part, on the grounds that '*the proposed development, by reason of the scale and spread of development on a largely undeveloped site, would have an adverse impact on the open and rural character of the site*' (reference 17/P/01451)

In coming to this conclusion the officer's report makes specific reference to the moderate density of housing in the adjacent estate (15dph) and its semi-rural feel with fields to the east. Overall, the officer notes, the character is one of moderate to low density housing and a transition point from the built up village to the countryside.

This is a characteristic that will be found with many other edge of village sites proposed for allocation in the Submission Local Plan.

The concern in terms of deliverability is that the proposed density at 18dph was found too high. It was therefore concluded that 25 units could not be accommodated without resulting in unacceptable harm. This is on a site that was originally proposed for allocation for approximately 50 dwellings.

Whilst it must be stressed that the application site is smaller than the proposed allocation (1.37ha compared to approx. 2.19ha), the proposed allocation was based on 23dph. This is 22% higher than what has been found unacceptable.

If this figure were translated across the allocation and LAA sites, it could perhaps be concluded that the number of units proposed per site is around 25% too high. This would have serious implications for meeting the OAN and delivering the spatial strategy as additional sites would be required to meet identified need.

Given the extent of Green Belt in the Borough, this is likely to require further release. The same would also be true if the Plan had to accommodate a greater housing requirement (Matter 9.8) unless it is accepted as part of the Plan that development at higher densities will be required to meet OAN.

I would request that the above be taken into account when considering the soundness and legal compliance of the Plan.

Yours faithfully,

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

Gillian Hanson
PLANIT CONSULTING