

Linden Homes

10 May 2018

**Delivered by email**

Guildford Borough Local Plan Examination  
C/O Banks Solutions  
64 Lavinia Way,  
East Preston,  
West Sussex,  
BN16 1EF

FAO: Inspector Jonathan Bore

Dear Sir,

### **GUILDFORD LOCAL PLAN - EXAMINATION**

We are writing on behalf of Linden Homes who have land interests at 'land at Green Lane, Flexford' (SHLAA site reference only part of the site as considered under – 990,989,2008, 302 and 75 -) where the site has been continually promoted through previous consultations on the emerging Local Plan for residential development.

Whilst the Submission Local Plan fails to identify the site for Green Belt release, it is considered that there are a number of matters in respect of the proposed Green Belt releases at identified villages that should be raised to inform the upcoming Hearings, as highlighted in a number the 'Matters and Issues' published .

The extent of the site is shown at **Appendix 1** and comprises 13.8 ha and is currently pasture land. The evidence base to the Local Plan has only considered part of the site which directly abuts the settlement boundary of Flexford. It is considered that the promotion of the wider site builds upon the findings of the Council's own evidence in relation to the site, and offers greater potential for housing delivery, affordable housing and community benefits.

In essence, the principal matters relate to the following:

- The sustainability of Flexford as a village that could accommodate growth;
- The assessment of the site within the Council's evidence base and the lack of justification for the site not being considered further within the Sustainability Appraisal and the exceptional circumstances identified to justify Green Belt release;
- The opportunities for the site to meet any identified shortfall in the housing requirement early in the plan period, aligning with the spatial strategy.

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**Matter 1, Issue 1.1****The Sustainability of Flexford**

At the Issues and Options stage of the Local Plan (October 2013), Normandy and Flexford were identified as a large village within the settlement hierarchy along with Send and Send Marsh, with West Horsley (North and South) identified as a medium village. This version of the Local Plan was supported by the Settlement Hierarchy Study (2013) where the combined facilities of Normandy and Flexford ranked Normandy and Flexford as the 5<sup>th</sup> highest settlement against the sustainability criteria, and the highest against the functional ranking. The distinction between sustainability criteria and functional criteria sought to not only reflect the provision of services/facilities but also public transport accessibility.

Following the consultation, the Settlement Hierarchy Study (2014)('SHS') was updated and whilst previous iterations of the Local Plan and evidence base recognised the inter relationship of Flexford and Normandy in terms of utilising shared facilities and accessibility, this criteria was removed from the 2014 version, albeit no justification was provided for this revised position. Within the 2014 SHS, the Sustainability for Normandy is noted as 13, whilst Flexford is identified as 27 with each being identified as a smaller village and medium village respectively.

Paragraph 6.4 of the Study states that *'there are other settlements that have been identified through the evidence gathering such as West Clandon (North and South), Flexford and Normandy which would benefit from future development and improved access to key services for local residents'*.

We further note that reference to the functional sustainability of the settlements has been removed.

From reviewing the level of facilities within Normandy and Flexford, it is considered that the settlements have capacity to provide additional development that will support the existing facilities and community. Given Normandy runs from Guildford Road southwards along Glaziers Lane and merges with Flexford at Wanborough Station (providing services between Ascot and Guildford every 30 minutes), it is considered that growth opportunities at the settlement should have been considered further. This is particularly relevant given paragraph 55 of the Framework recognises that 'development in one village may support services in a village nearby' which is applicable to the characteristics of Flexford and Normandy.

We consider that further justification should be provided as to why the Council has adopted an alternative spatial strategy since the Issues and Options consultation, and the reasons for why additional development at Flexford is not supported given the opportunities to deliver growth that can support the rural communities of two villages on a key transport route. We do not consider that the Council's evidence base robustly considers all reasonable alternative spatial strategies and sites when compared to other locations where Green Belt release is proposed beyond the main settlement of Guildford (see response below).

**Matter 1, Issue 1.1 and 9, Issues 9.1/9.2/9.5/9.8****Site Assessment and Green Belt Considerations**

The Council's evidence base identified part of the site as a potential allocation within the Issues and Options consultation in 2013. The site proforma supporting this consultation stated that the site was potential development area H15-A, and scored 3 against the purposes of the Green Belt and ranked 34<sup>th</sup> in terms of sustainability criteria. In addition, reference was made to the potential for a community use to be incorporated as part of a primarily residential development.

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Volume 1 of the 'Green Belt and Countryside Study' (2013) ('GBCS') provides a review of the Study and identifies the site as providing an opportunity to accommodate appropriate development without significantly compromising the purposes of the Green Belt. The site capacity was identified as 114 dwellings. The site scores 3 against the sustainability level and ranked 34 as a ranking (albeit note this was solely based on Flexford itself not combined with Normandy). There is no clarity to explain the change in the site's ranking.

Volume II (dated February 2013) provided the specific site scoring against the purposes of the Green Belt albeit the assessment is very high level and does not explicitly consider the particular characteristics of the land parcel. Part of the site scored a medium sensitivity against the purposes under area H15 and was considered to do the following:

- Checks westward sprawl of Flexford
- Assists in safeguarding the countryside from encroachment

However, we consider that the first point can be challenged on account of the physical boundaries which are clearly defined and would be permanent and defensible beyond the plan period, in line with paragraph 85 of the Framework. For instance, the overall site directly abuts the settlement boundary to the east, with the north and south boundaries defined by existing roads and/or railway line, and the western boundary abutting dense woodland, which would represent a permanent Green Belt boundary.

The enclosed aerial photograph (**Appendix 2**) demonstrates the extent of the site's high level of containment.

We note that land to the west of Flexford already breaches the proposed settlement boundary of Flexford given the number of existing properties within this area, and thus it can be argued that this part of the 'countryside' has already been significantly encroached by development. As such, we consider that the entire site functions low against the Green Belt functions in the absence of a robust review of the Green Belt function within the GBCS.

Volume III of the Study (dated February 2013) considers the location of potential development areas and whether they reflect the smaller scale of the villages and the relative levels of expansion in comparison to the urban areas<sup>1</sup>. Page 51 of the study summarises the potential of the site as follows '*H15-A is surrounded by defensible boundaries including tree cover and residential garden boundaries on Beech Lane to the north, residential gardens on Westwood Lane to the east, hedgerows near residential properties on Green Lane East to the south, and hedgerows with open farmland to the west of the PDA.*'

No technical constraints were identified and therefore the site continued to be identified as a potential development area.

Of the four sites identified around Flexford within Volume III, it is considered that Parcels C and D would breach the existing physical boundary of the train railway line and would be out-of-character to the existing linear development of Normandy. With regard to the parcel to the east of Flexford (parcel H11D) this is an established SINC.

As such, of the sites considered, parcel H15-A is the most appropriate to come forward for Green Belt release. In addition, there are limited sites identified on page 62 at Normandy that are adjacent to the settlement that could come forward for Green Belt release.

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<sup>1</sup> Paragraph 10.4 of the Countryside and Green Belt Study Volume III

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In this regard, the site scoring when compared to some other sites which are proposed allocations, the site scores better in some instances against the sustainability criteria and the Green Belt functions, and with some sites not even being considered as Potential Development Areas within the Study. As such, we would question how the evidence base to the Local Plan has led to the allocations proposed and why area H15-A has been discounted as a proposed allocation around an existing village especially given the proximity to Wanborough Station and facilities within Normandy.

Given the findings of the Council's own evidence base, we have set out below how the site has been considered within the wider evidence base to the Local Plan. Whilst the site has been identified as a potential development area since 2013 (within the Countryside and Green Belt Study - a document which is said to support the 'spatial strategy' contained within the draft local Plan) there is limited and contradictory justification for not pursuing the site within the emerging Local Plan. Neither the 2014 nor 2016 SHLAA set out robust reasoning for the site's exclusion which subsequently continued to the Regulation 19 consultation in 2017.

We understand the position set out by the Council is as follows:

Document	Justification	Turley Comment
<b>Land Availability Assessment (2016) - Identified part of the site under separate parcels Ref: 990,989,2008, 302 and 75</b>	Our spatial strategy and site allocations have been considered through the Sustainability Appraisal and this site no longer accords with the proposed spatial strategy in the Local Plan. The site was identified in the Green Belt and Countryside Study but is located within medium sensitivity Green Belt.	The site has not been robustly considered within the Sustainability Appraisal to justify this position.
<b>Land Availability Assessment (2017) -- Identified part the site under separate parcels Ref: 990,989,2008, 302 and 75</b>	Our spatial strategy and site allocations have been considered through the Sustainability Appraisal and this site no longer accords with the proposed spatial strategy in the Local Plan. The site was identified in the Green Belt and Countryside Study but is located within medium sensitivity Green Belt.	The site has not been robustly considered within the Sustainability Appraisal to justify this position.
<b>Housing Topic Paper (2017)</b>	The Settlement Hierarchy assesses both Normandy and Flexford as having limited services and facilities. In contrast to the strategic site no longer considered appropriate, the remaining PDAs is not of a sufficient scale to deliver any	This summary appears at odds with the previous iterations of the Settlement Hierarchy Study alongside the findings of the GBCS. The site at Flexford is within close proximity to the train station and benefits from being in close proximity to a number of facilities within Normandy. In addition, it is considered that the site

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viable and tangible infrastructure improvements that would provide sustainability benefits to the existing and new residents. We therefore consider their allocation would not constitute sustainable development and the harm associated with providing more homes here would significantly and demonstrably outweigh the benefits.

would constitute sustainable development in the context of Green Belt release in line with paragraph 85 of the Framework.

We do not consider there is sufficient justification to underpin the proposed spatial strategy in relation to Green Belt release at the villages nor to justify why the Council did not pursue the allocation of the site despite the findings of the evidence base.

The Council has not presented evidence to demonstrate that ‘viable and tangible infrastructure improvements’ cannot be provided at the site. Linden Homes consider that the site and development could deliver significant benefits for the villages and infrastructure and would welcome the opportunity to discuss with GBC. The allocation of the site would align with paragraph 55 of the Framework states *‘to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of the rural communities’*.

**Sustainability Appraisal (2017)**

The remaining 22 sites that are listed within Appendix E as having been identified as PDAs through the GBCS are ruled-out, i.e. it is a ‘given’, for the purposes of developing spatial strategy alternatives, that they should not be allocated.

The LAA (2017) identified that 2116 was discount over questions of suitability concerns. No further information was provided.

Limited justification provided to clarify ‘given’ as the Council’s evidence supports further consideration of the site.

We question how Green Belt release at the villages has been assessed given growth at the villages is considered part of the ‘spatial strategy’ (notably East/West Horsley, Send and Send March).

Given the above, there is a lack of clarity as to why the site has been discounted for Green Belt release despite being identified as a potential development area within the Council’s evidence base and not being robustly considered within the Sustainability Appraisal (2017). We are of the view that the allocation of the site would align with the spatial strategy given the allocation of similar sites (some of which have not been considered within the evidence base) as part of Green Belt release around existing villages.

**Matters 3, Issue 3.1 and Matter 5, Issue 5.3****The opportunities for the site to meet any identified shortfall in the housing requirement early in the plan period, aligning with the spatial strategy**

The Council's emerging Local Plan is proposing large scale releases around the principal settlement of Guildford. This is supported as a matter of principle given that this is acknowledged as the most sustainable location for significant Green Belt release to be considered in the Borough (aligning with paragraph 85 of the Framework). However, it would not be sustainable for Guildford's full OAN of 14,426 homes over the plan period to be delivered in this single geographic location, and therefore a dispersed approach across other towns and villages is supported.

However, the robustness of the Council's spatial strategy is particularly relevant, given that GBC has given no consideration to the unmet need of Woking (given this is crucial to demonstrating the Duty-to-Cooperate is satisfied especially in respect of the findings of the Inspector on the Waverley Borough Local plan where the OAN was increased (and additional 83 dwellings per annum) to accommodate part of Woking's unmet need.

As such, given there is uncertainty over whether GBC's OAN will need to increase through the Examination, GBC should have robustly demonstrated that all reasonable alternatives for identifying growth across the Borough (including at villages) have been identified and that there is sufficient delivery to be maintained over the plan period.

Paragraph 4.19 of the Guildford Borough Topic Paper: Housing Delivery acknowledges that there will be a shortfall in housing delivery in the early years of the plan requiring a phased housing target. In this regard, paragraph 4.47 states that *'given the shortfall early in the plan period and unmet needs within the HMA, we consider it is still necessary to consider the potential of each PDA regardless of its Green Belt sensitivity'*.

As such, the Topic Paper sets out at paragraph 4.152 that development at villages *'can be a sustainable option so long as careful consideration is given to the choice of location, where it can enhance and maintain the vitality of rural communities'* and *'in terms of maximising opportunities to significantly boost the supply of housing'*. The main focus for this approach is to *'deliver in the early years to ensure that whilst much of our supply is back loaded, we are nevertheless making a concerted effort to boost the sustainable supply of housing in the early years.'*<sup>2</sup>

As such, GBC is citing 'early delivery' at the villages as an exceptional circumstance for Green Belt release which was set out within the Council's response to the Inspector's Initial Questions.

It is unclear as to why our Client's site has been discounted and why 'exceptional circumstances' do not equally apply in this instance, given the findings of the evidence base, as discussed previously. It is considered that our site is appropriately placed to meet any identified housing shortfall arising through the Examination (either through reduced capacity on proposed allocations, withdrawal of sites from allocation or an increase in housing requirement) given it would align with the Council's justification for the need for Green Belt release around the villages and would support the sustainability of existing rural settlements.

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<sup>2</sup>Paragraph 4.152 of the Housing Delivery Topic Paper (2017)

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**Conclusions**

In light of the above, our Client considers that further consideration should be given to sites around existing villages where (i) there is clear evidence to demonstrate that the site has weakened function against the purposes of the Green Belt to warrant release, (ii) the site could deliver sustainable development including new homes and infrastructure in line with the Council's spatial strategy, and (iii) which would support the Council's exceptional circumstances case for development at the villages to ensure early housing delivery.

This site is controlled by Linden Homes, a national housebuilder with a regional office based in Guildford. This site is available for development and can deliver within the first five years of the plan period to contribute towards meeting the significant housing needs in the Borough.

We trust our comments are duly made and assist in the forthcoming Hearing Sessions.

Yours sincerely



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**Senior Planner**

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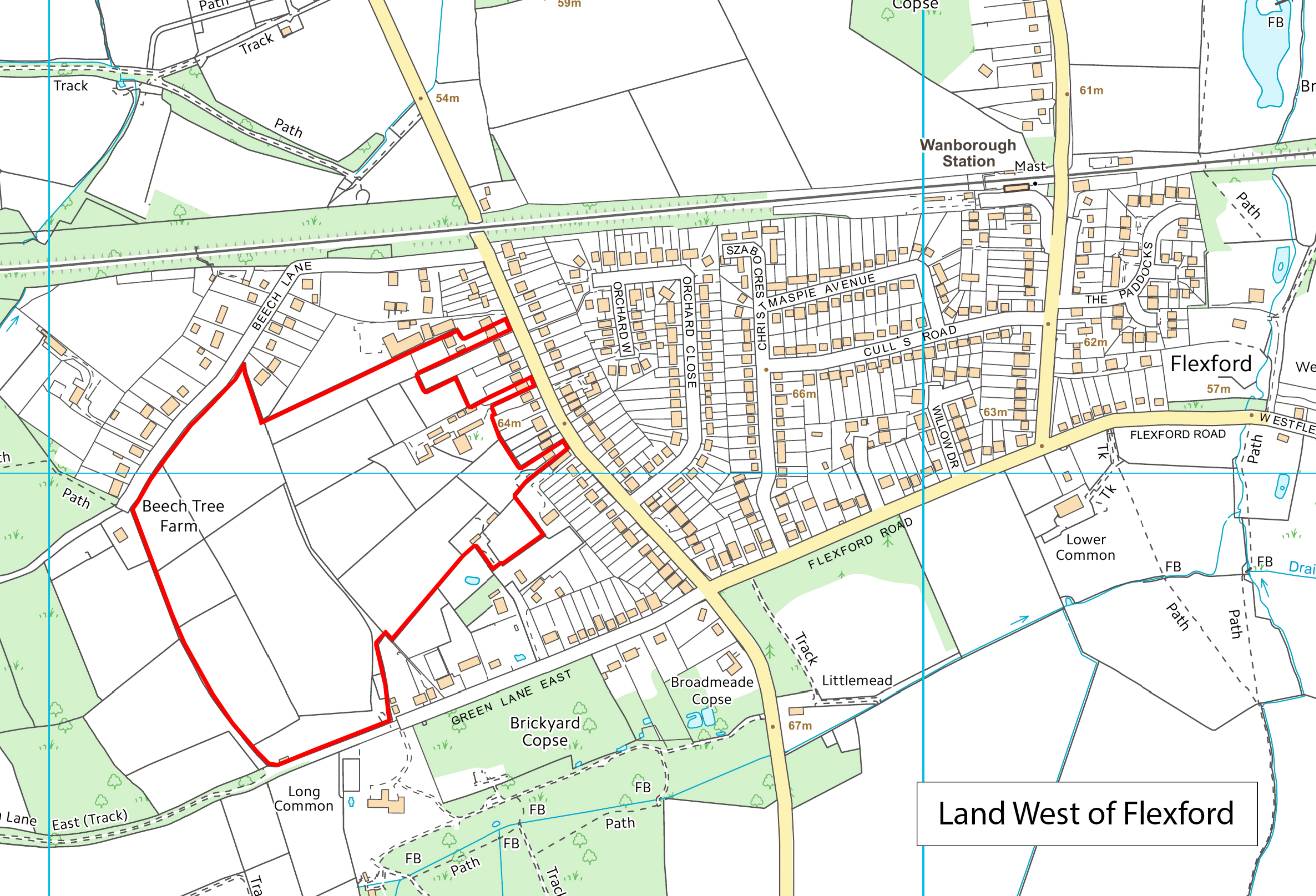
Respondent Number: 17461921

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## **Appendix 1: Site Location Plan**





Land West of Flexford

Respondent Number: 17461921

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## **Appendix 2: Aerial Image**

