

This Hearing Statement on behalf of Sustainable Land Products Ltd responds to the following Matters and Issues in the Inspector's list (ID/3):

2. Calculation of the Objectively-Assessed Need for Housing (OAN)
4. Housing Trajectory
5. Five-Year Housing Land Supply
9. Spatial Strategy, Green Belt and Countryside Protection
11. Site Allocations: A22 (Land north of Keens Lane, Guildford) and A23 (Land North of Salt Box Road, Guildford)

2. Calculation of the Objectively Assessed Need for Housing (OAN)

In our submitted Concept Statement for Tangley Place Farm, we noted that the Local Plan proposals failed to meet the full, objectively-assessed needs (OAN) for market and affordable housing in the housing market area; they failed to identify a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer to ensure choice and competition in the market for land; and they failed to identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15.

It was clear that the plan was not sound as the proposed spatial strategy did not comply with the requirements of paragraph 47 of the NPPF. We did not think it was therefore necessary to challenge in detail the methodology of GL Hearn's Strategic Housing Market Assessment Addendum Report (March 2017) which was fundamentally sound, although there are questions about the use of projections based on past migration trends that have been influenced by recent conditions in the Guildford housing market that were, in turn, influenced by planning policies and decisions.

We agree with the Inspector's question (ID/1) that a significant uplift is necessary in the assessment of housing needs based on projected household formation, in view of the evident problems of housing affordability and their continuing deterioration in the Borough.

The Council's response is that appropriate adjustments were made in the OAN for migration, household headship rates and student numbers, in response to 'market signals' about affordability, and that affordability ratios should be looked at over a longer term. However, there are some nonsensical statements in the Council's response: for example in paragraph 1.7:

'The SHMA logic was that the Council should be planning for the new houses built to be occupied at the local level. On this basis, upward adjustments within an OAN calculation mean that additional households are required to occupy them. This means either higher net migration or higher household formation within the local authority concerned (SD003 Para 5.46).'

This paragraph seems to suggest that increases in housing supply would determine trends in migration and household formation that in reality result from a number of underlying demographic, social and economic causes. There is also another incomprehensible statement in paragraph 1.24 about the solutions to deteriorating affordability:

'The solution however is to increase housing delivery looking forwards (as the submitted plan will do), not to adjust the requirement. The under-delivery in the early years of the plan period is made up later on, as the housing trajectory shows.'

4. Housing Trajectory

The phasing of the housing trajectory is a major concern about the plan which we identified in our consultation response. The Inspector has also identified this as *'an unacceptable aspect of the plan'*.

There is no attempt in the Plan or in the Council's response to the Inspector to consider the social and economic implications of under-provision or under-delivery of housing in the early years on existing and new households, or whether these impacts can be compensated by increased provision in later years.

The Council's response (paragraph 2.7) cites physical and planning constraints, including Green Belt which covers 89% of the Borough, as *'an extremely challenging backdrop to identifying sufficient sites to meet Guildford's needs, in particular in relation to early delivery.'* As there are insufficient development opportunities within the town and beyond the Green Belt, the Council has recognised that there are *'exceptional circumstances to justify amending Green Belt boundaries.'* The question is not whether amendments to the Green Belt are necessary, but how extensive they need to be and in what locations.

The Council's response (paragraph 2.10) states that *'In addition to seeking to meet its needs, the Council has also taken measures to maximise early delivery. This includes the allocation of a number of smaller Green Belt sites predominantly around villages, which are at the bottom of the spatial hierarchy. An important part of the "exceptional circumstances" justification for these sites is that they are necessary for early delivery as they are all projected to be completed within the first five years.'*

We believe that the Council's spatial strategy has failed to identify sufficient land to meet housing requirements, especially in the early years of the plan, because it has taken an excessively restrictive approach to Green Belt amendments and has relied too heavily on a small number of large sites that cannot deliver sufficient housing in the early years of the plan. In paragraph 2.11 of its response, it states that *'the Council are unable to sustainably accommodate its own full housing requirement in the early years of the plan.'* There is then the remarkable non sequitur: *'this justifies the proposed phased approach to housing delivery contained in Policy S2 of the plan.'*

We would say exactly the opposite: the shortfall of housing land supply in the early years of the plan requires a wholly different approach to the phasing of housing delivery, based on a different spatial strategy. The Council seeks to argue that the plan can be considered to meet its housing requirement, be positively prepared and effective because there is a potential supply of 1,700 homes in excess of the housing requirement of 12,426. Paragraph 2.12 says that this additional provision *'enables the Council to maximise all sustainable development opportunities, particularly those that are able to deliver early, whilst also providing sufficient flexibility should sites not deliver as planned, in accordance with the NPPF.'*

There is no evidence in the SHMA or the Council's response to the Inspector to justify the assertion that additional housing at the end of the plan period will compensate for substantial deficits in housing land for most of the plan period, which would persist until 2029/30 if the SHMA rate of 654 dwellings per annum is applied consistently throughout the plan period.

Even with the Council’s ‘phased’ or variable housing target in draft Policy S2, there is a continuing shortage of housing land supply until at least 2024/25. The Council has arbitrarily lowered the housing target below 654 dpa in every year between 2019/20 and 2026/27, to reflect expected problems in the provision of infrastructure needed to deliver some of its proposed housing allocations. This ‘back-end loading’ in draft Policy S2 is not consistent with the SHMA Addendum’s objective assessment of housing needs, the policies of the NPPF or Planning Practice Guidance. With a constant target there is a cumulative deficit in supply until 2027/28.

The Council’s approach to housing targets in the revised table with Policy S2, in their response to the Inspector, simply makes no sense. The target of 654 is applied until 2018/19 – prior to adoption of the plan. It then drops by 200 dpa to 450 dpa for two years, and then increases by increments of 50 or 100 dpa throughout the plan period, but does not return to the SHMA requirement of 654 dpa until after 2026.

The Council’s explanation of its approach to housing targets, in paragraph 3.5 of its response to the Inspector, is incomprehensible. The Council seems to believe that varying the annual targets is justified in order to avoid having a deficit in five-year housing land supply. This is an inversion in the usual logic of performance measurement:

‘Whilst this is currently labelled as the Annual Housing Target, it is important to clarify that this target is not the number of homes projected to be delivered within each of these years. Instead, it is the target number of homes against which delivery will be measured in order to calculate the rolling five year supply of housing.’

The cumulative picture of housing targets and land supply (which is not shown in the Council’s response to the Inspector) is shown in the table below. The graphs on the following page illustrate housing land supply (a) with the Council’s stepped housing targets and (b) with a constant target of 654 dwellings per annum, based on the SHMA.

Table 1: Housing Land Supply based on the Guildford Borough Council’s proposed ‘stepped supply’ targets (Policy S2).

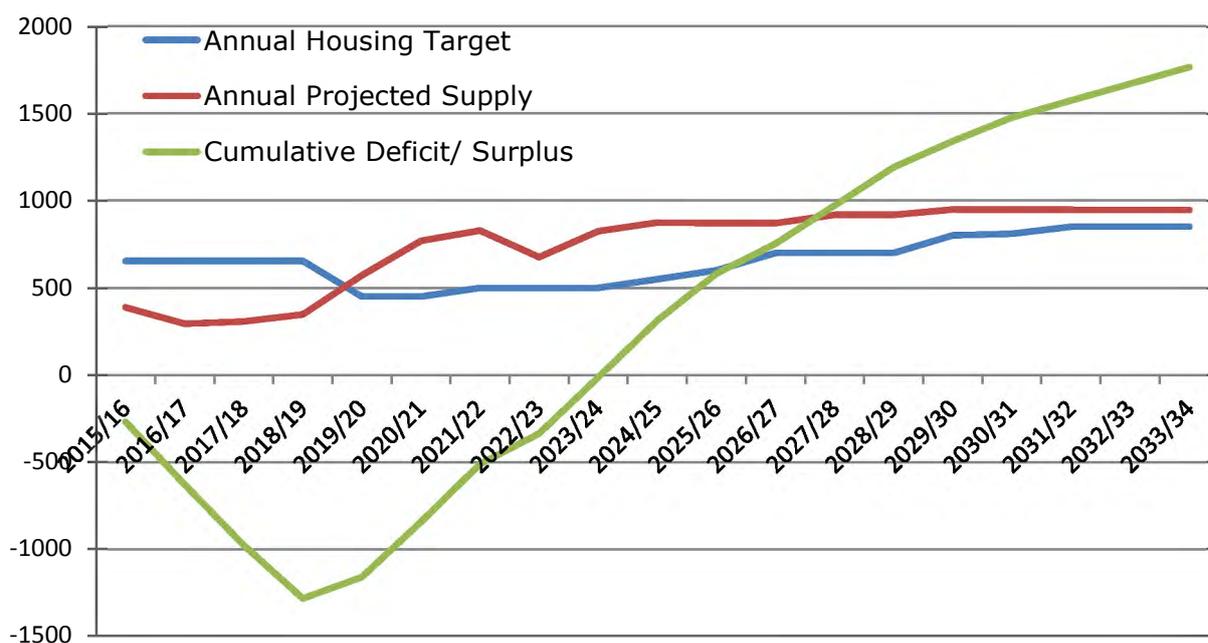
Year	Annual Housing Target	Cumulative Target	Annual Projected Supply	Cumulative Supply	Cumulative Deficit/ Surplus
2015/16	654	654	387	387	-267
2016/17	654	1308	294	681	-627
2017/18	654	1962	306	987	-975
2018/19	654	2616	348	1335	-1281
2019/20	450	3066	572	1907	-1159

2020/21	450	3516	769	2676	-840
2021/22	500	4016	829	3505	-511
2022/23	500	4516	675	4180	-336
2023/24	500	5016	824	5004	-12
2024/25	550	5566	874	5878	312
2025/26	600	6166	871	6749	583
2026/27	700	6866	870	7619	753
2027/28	700	7566	919	8538	972
2028/29	700	8266	919	9457	1191
2029/30	800	9066	949	10406	1340
2030/31	810	9876	947	11353	1477
2031/32	850	10726	947	12300	1574
2032/33	850	11576	946	13246	1670
2033/34	850	12426	945	14191	1765
Totals	12426		14191		

Source: GBC, Land Availability Assessment, October 2017

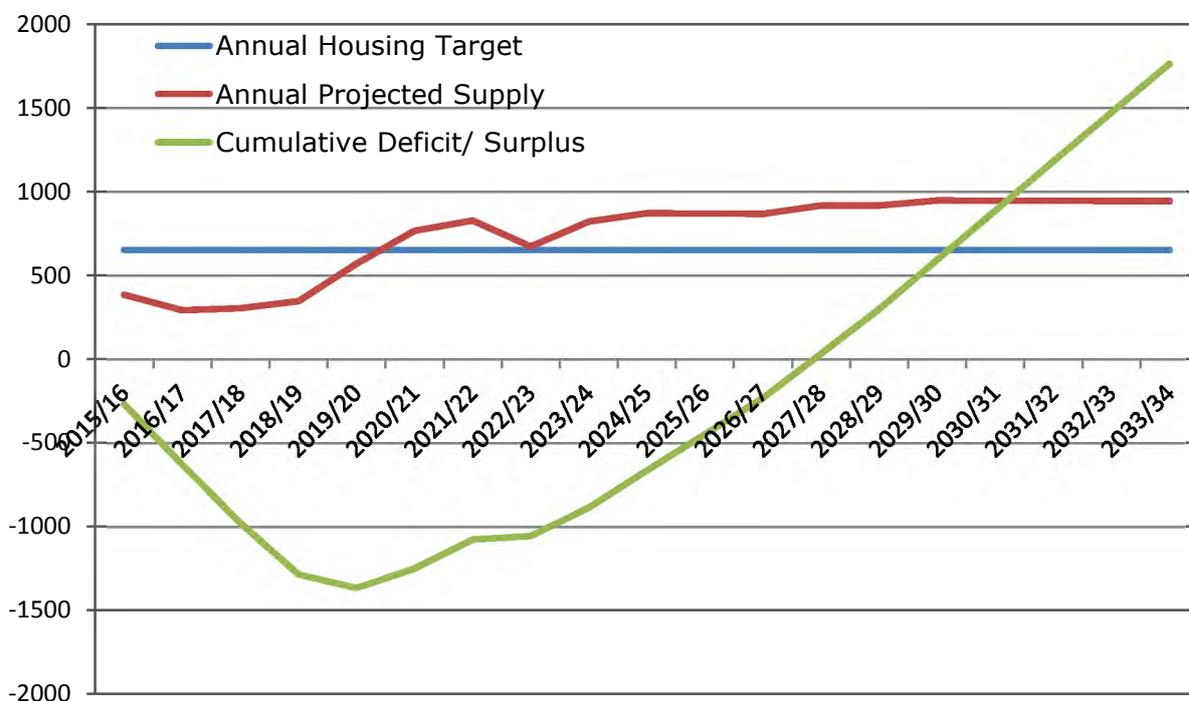
Housing Land Supply

(a) based on the Council's proposed 'stepped supply' targets (Policy S2)



Housing Land Supply

(b) based on the SHMA target of 654 dpa



Source: GBC, Land Availability Assessment, October 2017

5. Five-Year Housing Land Supply

The following table is based on the Land Availability Assessment (LAA) of October 2017 and the Council's Response to the Inspector's Question (Question 3 – Appendix 1). It updates the calculations in our submission (*Tangley Place Concept Statement*) which were based on data from the LAA Addendum of June 2017.

The five-year housing land supply from 2017/18 to 2021/22 appears to have increased from 2.36 years to 3.02 years. (The earlier figure still appears in paragraph 3.27 of the Council's Response.) The calculation is presented here because we could not find a similar, explicit presentation of the figures in either of the Council's documents.

Table 2: Five-Year Housing Land Supply 2017/18 to 2021/22

Five-Year Housing Land Supply Calculation		Dwellings	Years
1	Basic Annual Requirement	654	
2	Basic Five-Year Requirement	3270	
3	Backlog from 2015/16 and 2016/17	627	

4	Five-Year Requirement from 2017/18 with Backlog	3897	
5	Five-Year Requirement with Backlog plus 20% Buffer	4676	
8	Total Five-Year Supply	2824	
9	Deficit in Five-Year Supply	-1852	
10	Number of Years' Supply		3.02

Source: GBC, Land Availability Assessment, October 2017

It is clear that the plan fails to meet the requirements of paragraph 47 of the NPPF: to identify a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% or 20% where there has been a record of persistent under delivery of housing.

The Council's Response to the Inspector's Question does not provide a clear, explicit account of the five-year supply of housing land and declines to provide an amended trajectory. It presents a confusing explanation of the Council's approach which often appears to be inconsistent; for example the summary on page 21 includes the following contradictory statements:

'The Annual Housing Target in Policy S2 is significantly lower than the projected number of homes that is expected to be delivered each year...'

'The proposed housing trajectory is considered to be realistic and deliverable.'

'...the Council has taken positive steps to maximising early delivery such as allocating numerous small Green Belt sites that can all deliver early.'

'Guildford Borough Council has submitted a plan that seeks to meet housing need but for justifiable reasons this will need to be back loaded to a degree.'

Much of the response to Question 3 of the Inspector's Questions is an attempt to justify the failure to meet the objectively-assessed need for housing throughout much of the plan period. The Council's '*stepped trajectory*' amounts to varying the housing targets to match the failings in housing delivery due to an ineffective spatial strategy and an attempt to disguise the plan's failure to meet the requirements of paragraph 47 in the NPPF for housing delivery in successive 5-year phases of the plan.

The attempt to justify this approach is specious and disingenuous. Paragraph 3.2 states:

'Whilst this (the Annual Housing Target in Policy S2) is currently labelled as the Annual Housing Target, it is important to clarify that this target is not the number of homes projected to be delivered within each of these years. Instead, it is the target number of homes against which delivery will be measured in order to calculate the rolling five year supply of housing.'

Paragraph 3.47 adds:

'As set out above, the reason why the annual housing target is so much lower than the actual delivery is projected to be is so that the oversupply each year (delivery over and above the 'annual housing target') can contribute towards meeting the undersupply that has been accrued since the beginning of the plan period (approximately 2 years' worth of housing or 1,300 homes). The backlog is further compounded by the requirement to build in a 20% buffer, in accordance with the NPPF given the persistent past under-delivery (approximately another 1.5 years' worth of supply or almost 1,000 homes). In total the first six years of the plan post-adoption is projected to deliver 1,600 more homes than the sum of the annual housing target for this same period.'

Guildford Borough Council believes that it is acceptable to produce an annual housing target that is not related to the objective assessment of housing need and not related to realistic assessments of housing delivery, but is contrived simply to avoid a failure to meet the target for five-year housing land supply.

We are not altogether clear about the significance of the table in paragraph 3.13. It purports to demonstrate the impossibility of addressing the backlog from the first two years of the plan within the following 5 years, but there is nothing inevitable about that conclusion. A more relevant conclusion, if the Council were positively seeking opportunities to meet the development needs of their area, in accordance with paragraph 14 of the NPPF, would be to review the spatial strategy with the aim of identifying options for sustainable development that can increase the delivery of housing within the first five years of the plan. The Council merely reiterates, in paragraphs 3.15 to 3.50, why it considers that it is too difficult to meet housing requirements as they arise within the first 12 years of the plan, based on the SHMA requirement of 654 dwellings per annum (or 8 years, based on the Council's proposed 'stepped targets').

In paragraphs 3.49 and 3.50 of its response to Question 3, the Council suggests that the backlog of housing delivery from the first two years of the plan (1,300 homes) cannot be restored within the first five years of the Plan (the Sedgefield method) or even over the whole remaining plan period (the Liverpool method). That is their justification for proposing the '*stepped housing target*' (combined with the Liverpool approach to backlog) which imposes further delay in meeting the objectively-assessed need for housing.

The demographic, social and economic implications of the Council's approach to housing land supply are not considered; for example the impacts on housing affordability, on the life chances of young people hoping to form new households, live independently and start families, or the impacts of housing costs and shortages on labour supply in the local economy. These implications require serious consideration to be weighed against the perceived disadvantages of further amendments to Green Belt boundaries, in accordance with paragraph 84 of the NPPF.

In our view there are significant opportunities to increase the supply of housing within the first five years of the plan on the edge of the built-up area of Guildford and in sustainable village locations within the Green Belt.

9. Spatial Strategy, Green Belt and Countryside Protection

The fundamental problem with housing land supply in the Local Plan is the result of the spatial strategy and the approach to Green Belt review. Paragraphs 3.15 to 3.19 of the Council's Response to the Inspector's Questions explain the limitations of various development options.

Sites within Guildford town centre, sites in the urban areas of Guildford, Ash and Tongham, sites within identified and inset villages, and the redevelopment of previously developed sites in the Green Belt are said to be capable of accommodating only 6,921 homes or 56% of the objectively assessed need for housing.

The next set of options considered were an Ash and Tongham urban extension (beyond the Green Belt), and (within the Green Belt) Guildford urban extensions, a new settlement at the former Wisley airfield, and development around villages. The Council prioritised strategic sites, including Guildford urban extensions and a new settlement over village extensions.

Whilst we can appreciate the reasons for these priorities, in terms of sustainability and opportunities for mixed uses, development options also need to be considered in terms of what housing they can deliver especially in the early years of the plan.

The Council places great emphasis on the Green Belt and Countryside Study which it says was prepared over a number of years (paragraph 3.19). It says that the study *'does not seek to identify a specific level of development'*.

In our view the conclusions of that Study, particularly in relation to Green Belt, should be re-evaluated in the context of subsequent information on housing requirements, housing land supply and the availability of alternative locations, as the weight to be given to maintaining existing Green Belt boundaries should be balanced against the need for sustainable development. That is implicit in the requirements for Green Belt review in paragraph 84 of the NPPF:

'When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.'

Striking an appropriate balance between Green Belt and sustainable patterns of development can be achieved only on the basis of specific development requirements and specific locations.

The exceptional circumstances that justify the release of additional sites from the Green Belt are the shortages of housing land that will result, especially in the first half of the plan period unless additional sites are released in a carefully considered in a review of Green Belt boundaries that gives more weight to the need for additional housing sites in sustainable locations. The Council has already demonstrated through this draft Local Plan that it has *'examined fully all other reasonable options for meeting its identified need for development'*, the test proposed in paragraph 136 of the draft review of the National Planning Policy Framework (March 2018). Further changes to the Green Belt are justified and unavoidable.

11. Site Allocations: A22 (Land north of Keens Lane, Guildford) and A23 (Land North of Salt Box Road, Guildford)

We appreciate that the purposes of the Examination hearings do not include the consideration of unallocated, 'omission sites'. However, to illustrate the potential for changes in the locational strategy on the urban fringe of Guildford, we have appended a Concept Statement for Tangley Place Farm, Tangley Lane, Worplesdon.

This area was originally identified as a '*Potential Development Area*' in the 2014 Green Belt & Countryside Study. The boundaries of the area were defined by the surrounding roads. Part of the area to the south (north of Keen's Lane) was proposed as a housing allocation in the 2016 Local Plan consultation and is retained in the submitted 2017 Local Plan as an allocation for 150 homes and a care home (Site Allocation A22).

Land Parcel J1 (Liddington Hall Farm), south of Tangley Place Farm, was shown as an area of '*medium sensitivity*' in the 2014 Green Belt & Countryside Study, but was also identified as a '*Potential Development Area*'. It appeared in the Draft Local Plan (Regulation 18) Consultation of July 2014 as a potential allocation for 660 homes and a travellers' site (Site 78 on the 2016 LAA), but was removed from the 2016 Proposed Submission (Regulation 19) Draft of the Local Plan.

Tangley Place Farm is included within Land Parcel J4, to which the 2014 Green Belt & Countryside Study attributed support for 3 of the 4 purposes of Green Belt:

- '*Checks the eastward sprawl of Fairlands and southward sprawl of Worplesdon;*
- '*Prevents the settlements of Fairlands and Worplesdon from merging;*
- '*Minimal existing development therefore safeguards the countryside from encroachment.*'

Tangley Place Farm is divided from the bulk of Land Parcel J4 by the brook to the west which is a natural physical boundary. It has a closer relationship with Land Parcels J3 and J1 than with land to the north west of Fairlands which makes up the bulk of Land Parcel J4 and which influenced the area's appraisal in the Green Belt & Countryside Study as containing Fairlands and preventing its merger with Worplesdon.

There is a clear case for modifying the Green Belt boundary to exclude both of the above sites (Land Parcels J1 and J3) and land west of Tangley Lane (within Land Parcel J4), with a modified Green Belt boundary running north-south along the natural physical boundary of the brook between Worplesdon Road (A322) and Gravetts Lane. This case was made in representations by SLP on the 2016 Local Plan consultation.

The case is strengthened by the proposed allocation of land north of Keen's Lane for 150 homes and a care home (Site Allocation A22) and by the case for the allocation of land at Liddington Hall Farm, which was previously identified as a potential housing allocation and was promoted by Indigo Planning on behalf of the Guildford College Group in response to the consultation on the 2016 Proposed Submission Draft of the Local Plan. There is a clear case for its reinstatement as a housing allocation in view of the shortage of housing land supply, especially in the first half of the local plan period.

It is clear that Tangley Place can make a useful contribution to meeting the Borough's housing requirements without significant harm to the purposes of the Green Belt. It also offers an alternative and better location for the burial ground that is currently proposed on land north of Salt Box Road (Site Allocation A23) which is also in the Green Belt, adjacent to Whitmoor Common within the Thames Basin Heaths SPA, and almost surrounded by a Site of Special Scientific Interest.

APPENDIX

Guildford Local Plan Examination: This document is an appendix to the Hearing Statement on behalf of Sustainable Land Products (Respondent No: REP/17431057)



TANGLEY PLACE FARM, GUILDFORD

*TANGLEY PLACE –
A NEW RESIDENTIAL NEIGHBOURHOOD
TO THE WEST OF GUILDFORD*

**CONCEPT
STATEMENT
DOCUMENT**

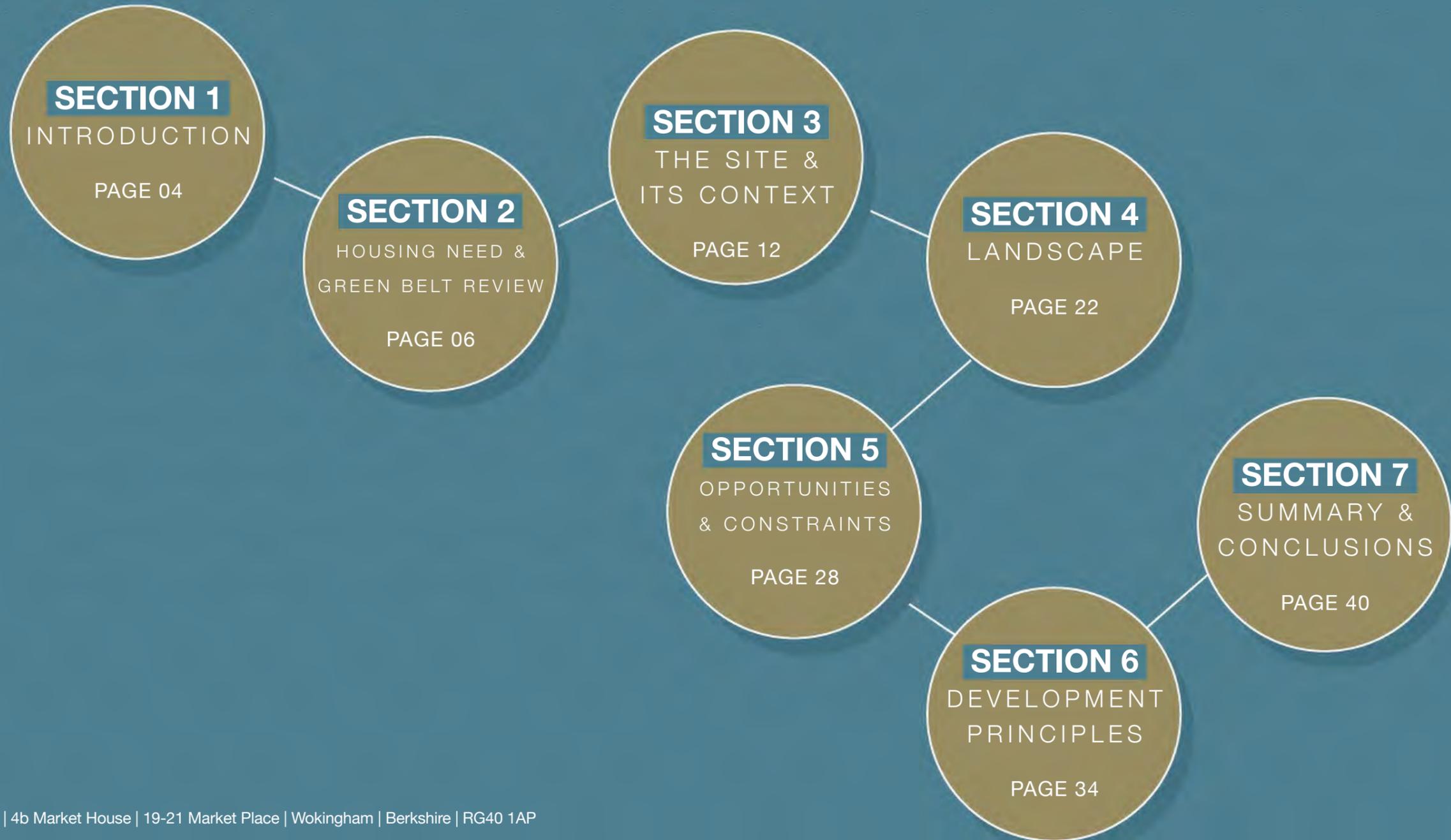
PREPARED BY
SUSTAINABLE LAND

JULY 2017



CONTENTS

NOTE: THIS DOCUMENT IS DESIGNED TO BE VIEWED AS A3 DOUBLE SIDED





SECTION 1
INTRODUCTION

THE VISION

This report develops the concept of a new residential neighbourhood north of Keens Lane and Gravetts Lane and south of Worplesdon Road, north west of Guildford.

The identified housing needs of the Borough of Guildford will require the allocation and release from the Green Belt of sites of this kind, in sustainable locations on the edges of the urban areas.

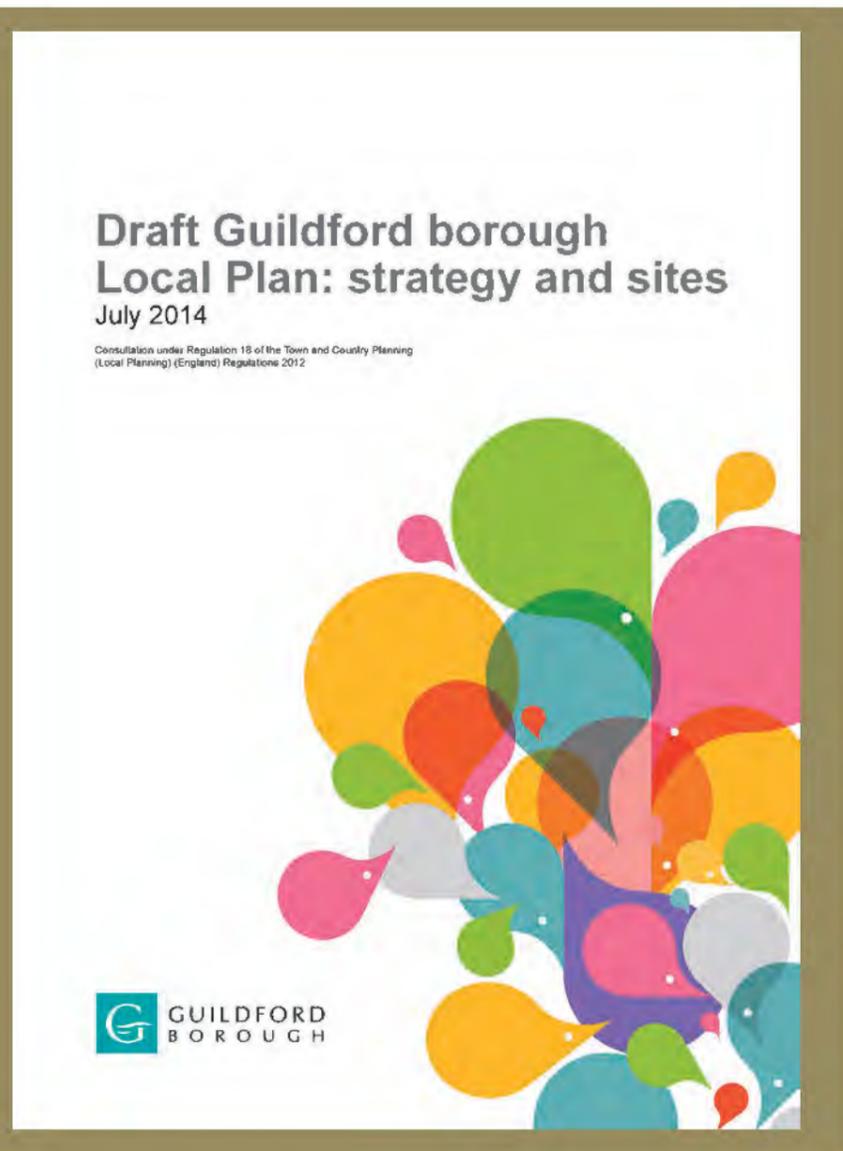
This report follows previous submissions in response to consultations on the Local Plan in November 2013 (Issues and Options), in July 2014 (Regulation 18 Draft Local Plan) and in July 2016 (Regulation 19 Proposed Submission). The July 2016 submission included a report on land at Tangley Place Farm in the context of the emerging Local Plan, with a summary of opportunities and constraints, indicative proposals, and a preliminary landscape and visual appraisal.

This report provides additional information in support of the previous submissions. It also responds to changes in the Guildford Local Plan Strategy and Sites Proposed Submission, which are the subject of a further Regulation 19 Consultation in June/July 2017, and additional information that has been added to the evidence base. The following issues are considered:

- Housing requirements and the need for releases of Green Belt land;
- Locational attributes of the site, including its surroundings, the availability of transport and other facilities, and proposals on neighbouring sites;
- Topography and landscape, including the site's relevance to the Green Belt;
- Other physical characteristics and constraints, including the site's habitats and ecology, flood risk and drainage requirements, archaeology and built heritage assets; and
- Development principles in response to the identified opportunities and constraints.

As the Council says that it is only consulting on changes in the current draft Local Plan compared with the previous Regulation 19 Consultation, this report responds to those changes and to new evidence; to elaborate and refine the responses made by SLP to previous consultations. It is in support of duly-made representations which are submitted separately in accordance with Regulation 20 of The Town and Country Planning (Local Planning) (England) Regulations 2012. To make sense of those changes and to comment on the overall soundness of the plan it will also be necessary to refer to elements of the plan that have not changed.

OPPOSITE PAGE: AERIAL VIEW OF SITE





SECTION 2
GREEN BELT
& HOUSING

HOUSING NEED & GREEN BELT REVIEW

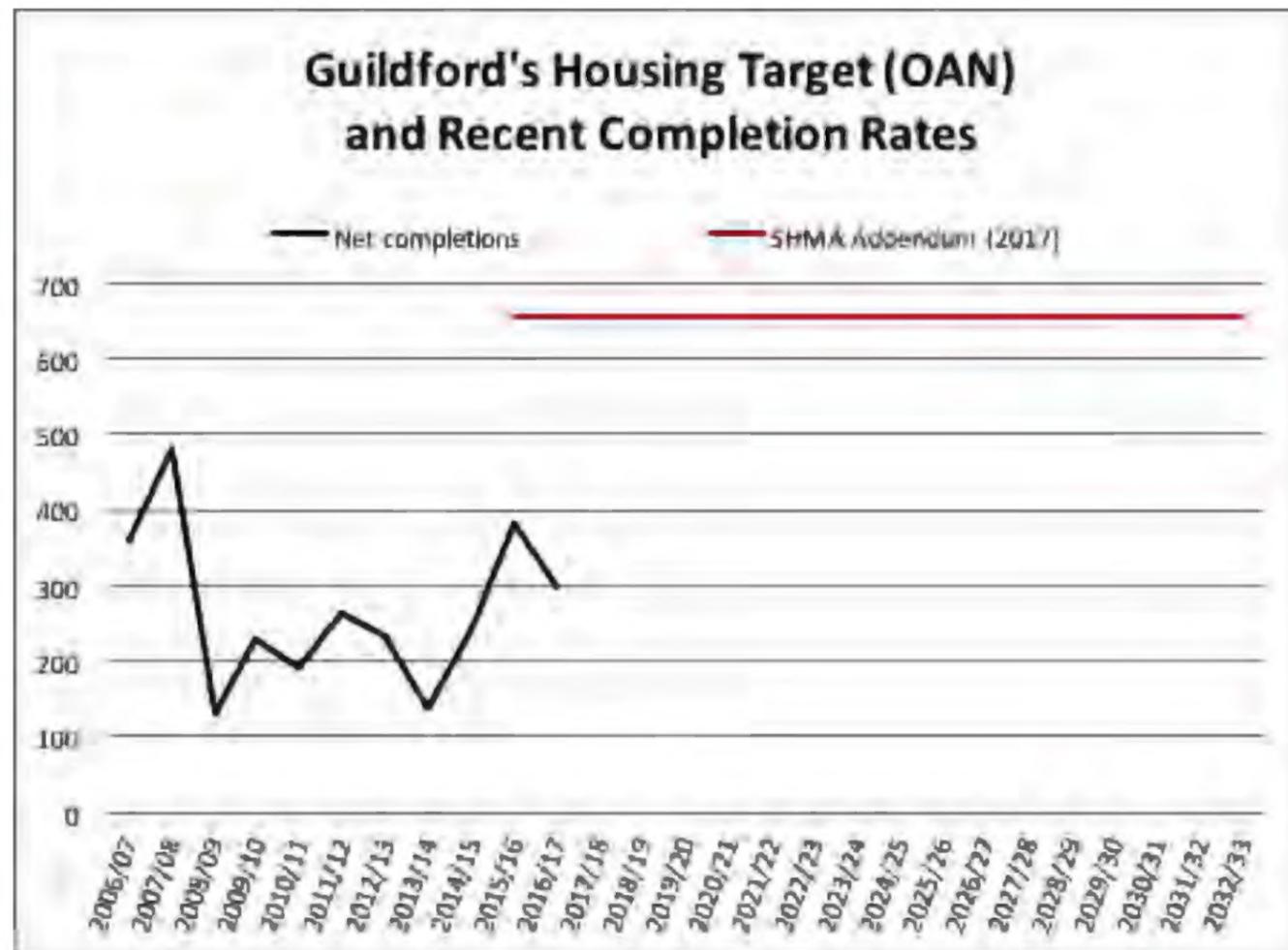
The Need for Housing

The latest objective assessment of housing needs (OAN) for the Borough of Guildford is in the Strategic Housing Market Assessment (SHMA) Addendum Report 2017 (March 2017). Information on the past performance of housebuilding in the Borough is in the Monitoring Report 2015/16 (October 2016). The latest Information on the availability of sites for new housing is in the Land Availability Assessment (LAA) Addendum of June 2017, based on the updated OAN of 654 dwellings p.a.

Past Performance

The following graph compares the OAN of 654 dpa with recent levels of housing completions in the Borough. The Housing Topic Paper (June 2017) notes that completions have been less than 300 dpa in all but one of the last nine years since 2008/9.

There is clearly a challenge to raise housing completions to the level required by the SHMA and a substantial backlog of undersupply at the start of the plan period that should be met within the early years of the plan.



Updated Housing Supply Trajectory

A graph of the Council's housing supply trajectory, compared with the Council's 'phased' or variable housing target and information as shown in draft Policy S2 and in the June 2017 LAA addendum is reproduced below. It shows a continuing shortage of housing land supply, until at least 2024/25.

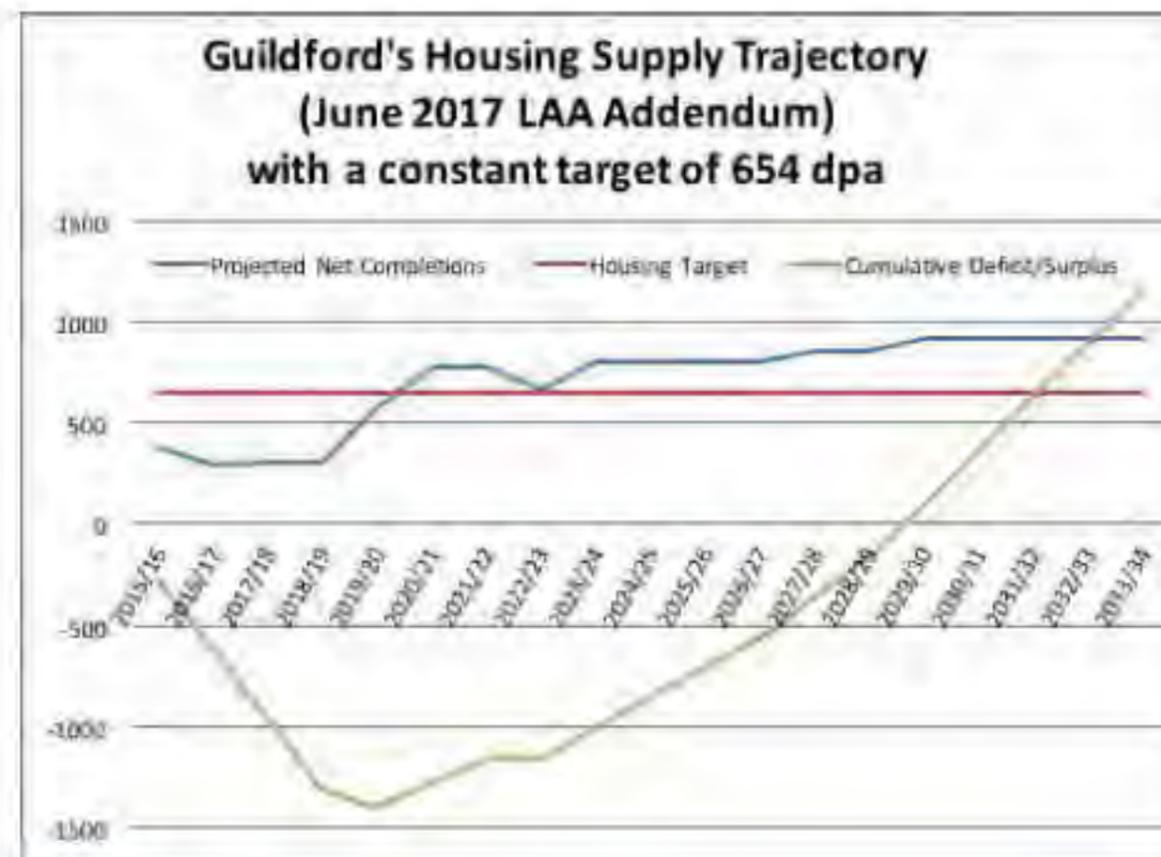
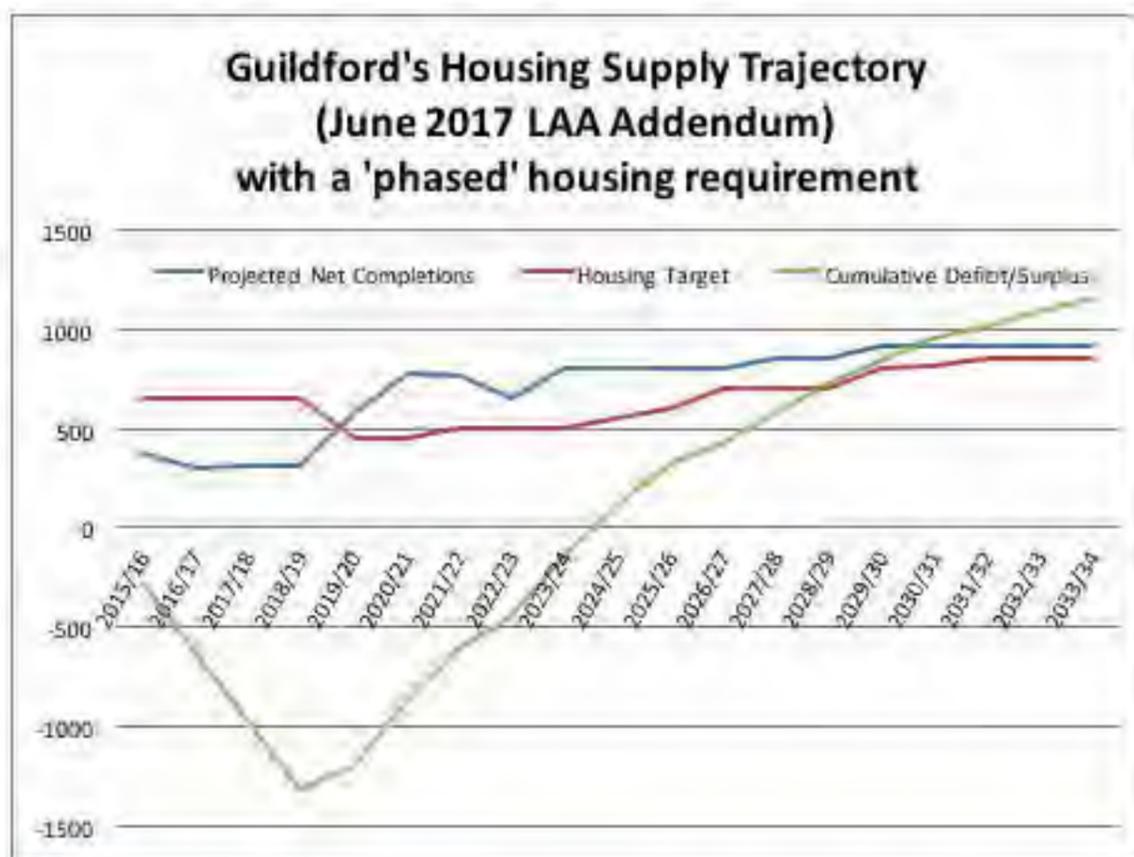
However, this graph gives a misleading impression of the plan's ability to deliver housing land in accordance with the

SHMA's objective assessment of housing needs (OAN) of 654 dwellings p.a., because of the 'phasing' of the housing requirement, in Local Plan Policy S2. The Council has arbitrarily lowered the housing target below 654 dpa between 2019/20 and 2026/27 to reflect expected problems in the provision of infrastructure needed to deliver some of its proposed housing allocations. This adjustment is not justified by the SHMA Addendum's objective assessment of housing needs, policies of the NPPF or the guidance of the NPPG.

The graph below provides a more relevant and realistic picture; comparing the LAA Addendum's housing supply trajectory with a target to achieve the SHMA Addendum's housing requirement of 654 dpa throughout the plan period.

This graph shows a continuing shortage of housing land until 2029/30, if the SHMA requirement of 654 dpa is applied consistently throughout the plan period. This continuing deficit for most of the plan period is concealed

by the Council's arbitrary and unjustified 'back-end loading' approach of 'phased' housing targets in draft Policy S2 which reduces the housing target below 654 dpa in every year between 2019/20 and 2026/27.



Five-Year Housing Land Supply

The housing supply trajectory also shows that the Borough has only 2.36 years' supply of housing land available within the next 5 years against the requirement of 654 dwellings p.a. from 2015/16 in the SHMA 2017 Addendum: less than half of the 5-year requirement.

Calculation of Five-Year Housing Land Supply from the LAA Addendum, June 2017:

Item		Number of Dwellings	Number of Years
1.	Basic Annual Requirement (from SHMA 2017 Addendum)	654	
2.	Basic 5-year Requirement (654 x 5)	3270	
3.	Backlog from 2015/16 and 2016/17 (from LAA Addendum, June 2017)	630	
4.	Requirement plus backlog (3270 + 630)	3900	
5.	Five-Year Requirement with backlog plus 20% buffer	4680	
6.	Planning Permissions (from LAA)	1650	
7.	Other identified sites (from LAA and windfall)	560	
8.	Total Five- Year Supply (1650 + 560)	2210	
9.	Five-Year Supply Deficit (2210 – 4680)	-2470	
10.	Number of Years' Supply within 5 Years (2210 ÷ 4680 x 5)		2.36

Proposals of the draft Local Plan therefore fail to comply with the NPPF because:

- they fail to meet the full, objectively-assessed needs for market and affordable housing in the housing market area;
- they fail (by a substantial margin of more than 50%) to identify a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer to ensure choice and competition in the market for land; and
- they fail to identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15; in fact, supply does not exceed the requirement of 654 dpa until the 15th year of the plan.

The Council suggests that housing targets should be phased towards the latter part of the plan period. Policy S2 includes the following statement (carried forward from the previous draft):

'the delivery of homes is expected to increase over the plan period, reflective of timescales associated with the delivery of strategic sites and infrastructure. The housing target each year ... is not a ceiling, and earlier delivery of allocated sites will be supported where appropriate, subject to infrastructure provision.'

Paragraphs 4.1.9a and 4.1.9b state:

'The figures set out in the Annual Housing Target table sum to a total of 12,426 homes. This is lower than the total supply of homes identified in the Land Availability Assessment as having potential to be delivered over the

plan period. This is to build flexibility into the plan and demonstrate that our strategy is capable of delivering the target. It also adopts a phased target that gradually increases over time rather than the same annualised target of 654 homes each year. This is due to the likely rate of delivery, particularly on the strategic greenfield sites, which is dependent upon the delivery of necessary infrastructure expected to occur towards the end of the plan period.

'This phased approach is necessary in order to ensure that the Council is able to demonstrate a rolling five-year supply of housing from the date of adoption, as required by national policy. This will also take account of both the deficit accrued until that point and includes a 20 per cent buffer moved forward from later in the plan period. Without a rolling five-year supply of homes, relevant policies for the supply of housing would not be considered up-to-date.' (Emphasis added.)

There is no justification for this approach in terms of the objective assessment of housing needs in the SHMA. The approach is supply led and demonstrates a failure of the spatial strategy to deliver housing sites in accordance with housing need, because of the limited range of proposed site allocations and problems with the delivery of infrastructure to serve some of the proposed allocations.

The Housing Topic Paper (June 2017) concedes, in paragraph 4.37, that the draft plan does not 'boost significantly the supply of housing' as required by paragraph 47 of the NPPF and does not 'deal with undersupply within the first five years of the plan period...' as required by paragraph 035 of the NPPG.

The Council's Spatial Strategy

The Council's spatial strategy relies on a limited number of strategic sites where there are significant requirements for infrastructure that cannot be provided in step with housing requirements. It is a consequence of the Council's reluctance to review Green Belt boundaries and to allocate sites on the edges of the urban areas which could be implemented earlier in the plan period.

The need to demonstrate a rolling five-year supply of housing is no justification for this approach to phasing as argued in paragraph 4.1.9b. Housing land supply should be measured against housing requirements and there is no justification in the SHMA for a phased supply of housing that increases towards the end of the plan period and remains below housing requirements for more than half of the plan period.

Measured against housing requirements, the Council is not able to demonstrate a five-year supply of housing land until the latter part of the plan period, even on the basis of the housing supply trajectory in the Land Availability Assessment, which is said (in paragraph 4.1.9a) to include higher figures than the local plan targets. To plan for housing provision that is below requirements for most of the plan period is clearly inconsistent with the policies of the NPPF and the advice of the NPPG (contrary to what the Council says in paragraph 4.1.10).

The Housing Topic Report (June 2017) admits in paragraph 4.189:

'Whilst we are continuing to explore whether neighbouring authorities are able to help contribute towards our early supply, it is unlikely that this backlog will be capable of being met in the first five years of the plan as required by the NPPG without significant harm to the Green Belt, and other harm as identified in this topic paper. We consider this is justified on the basis of the significant level of infrastructure that is required to be delivered in order to ensure that development across the borough is sustainable. This is further exacerbated by the reliance on a number of strategic sites which by their very nature take longer to deliver'.

We also note that the Council no longer claims that the proposed increase in new homes would be in line with their Economic Strategy.

Changes in spatial strategy are therefore required to provide a planned supply of housing land that matches requirements over the whole of the plan period, including the allocation of sustainable sites that are not dependent on major infrastructure investment and can be developed early in the plan period. Meeting the Borough's housing requirements will need the allocation of a wider range of sites, including small and medium-sized sites, in a range of sustainable locations that include some sites that are currently in the Green Belt on the edges of the urban areas, where modification of Green Belt boundaries will be necessary.

The shortage of housing land supply that would result from policies and proposals of the draft Local Plan constitute the 'exceptional circumstances' (NPPF paragraph 83) that would justify the alteration of Green Belt boundaries in the Local Plan.



Green Belt Review

The NPPF is clear that it is appropriate to modify Green Belt boundaries through a local plan review (paragraph 83) and ‘when drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channeling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary’ (paragraph 84). The NPPF also sets out the criteria for defining Green Belt boundaries (in paragraph 85).

The Guildford Local Plan has not followed the approach of the NPPF in relation to meeting housing requirements (paragraphs 14 and 47 to 55) or in relation to balancing the benefits of Green Belt against the benefits of sustainable patterns of development and applying robust criteria to the definition of Green Belt boundaries for the long term (paragraphs 79 to 86).

The Council’s review of the Green Belt has applied inappropriate criteria, based on the purposes of Green Belt (as defined in paragraph 80 of the NPPF), to arbitrary parcels of land, in a piecemeal and disjointed way. It has not balanced the purposes of maintaining the Green Belt against the benefits of sustainable patterns of development, as required by paragraphs 84 and 85 of the NPPF.

It appears that only Land Parcels adjoining the edge of the main urban areas were assessed against sustainability criteria, when being considered as Potential Development Areas. They were scored against sustainability criteria based on walking distances to various facilities, but it is not clear

how these criteria were weighed against Green Belt criteria or whether the potential benefits of development were weighed against Green Belt criteria to evaluate the relative advantages of different locations in a more meaningful way.

The Council’s ‘cellular’ approach based on arbitrary parcels of land failed to address opportunities to review Green Belt boundaries in ways that are required by paragraph 85 of the NPPF and that:

- are consistent with the Local Plan Strategy for meeting identified requirements for sustainable development;
- do not include land which it is unnecessary to keep permanently open;
- identify 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;
- define Green Belt boundaries that will not need to be altered at the end of the development plan period; and
- define boundaries clearly, using physical features that are readily recognizable and likely to be permanent.

The Council’s procedure of scoring arbitrary parcels of land against the purposes of Green Belt is not consistent with this approach. Some purposes of Green Belt (such as safeguarding the countryside from encroachment) must apply, by definition, to any undeveloped rural site. Others (such as assisting with urban regeneration) are impossible to attribute to individual sites. Others (such as checking the unrestricted sprawl of large built-up areas) can be achieved by a variety of local planning policies.

The use of pre-determined parcels of land also limited the scope for looking at Green Belt boundaries in a strategic way, in conjunction with other planning opportunities and constraints. The approach applies any perceived role of a land parcel to the whole area and does not acknowledge differences within a land parcel that could justify changes in Green Belt boundaries within the land parcel. Land parcels that adjoin urban areas are generally considered to have ‘high sensitivity’. They include some of the most sustainable locations for development because of their transport links and access to local facilities.

The Council’s approach was, in effect, to seek justifications for retaining Green Belt, rather than to balance the claims of sustainable development against the advantages of Green Belt retention (as required by the NPPF). The emphasis on retaining the Green Belt with only minimal changes has increased during the preparation of the plan in response to political pressures. There have been unexplained changes in judgements that were applied to individual parcels of land at various times during the Green Belt & Countryside Study.

There have been several changes in the classification of land parcels in the vicinity of Tangle Place Farm and inconsistencies in their treatment. For example, Land to the east of Tangle Place Farm (Land Parcel J3) was shown as an area of ‘low sensitivity’ and a ‘Potential Development Area’ in the 2014 Green Belt & Countryside Study. The boundaries of the area were defined by the surrounding roads. Part of the area to the south (north of Keen’s Lane) was proposed as a housing allocation in the 2016 Local Plan consultation and is retained in the current 2017 Local Plan consultation as an allocation for 150 homes and a care home (Policy A22).

Land Parcel J1 (Liddington Hall Farm), south of Tangley Place Far, was shown as an area of 'medium sensitivity' in the 2014 Green Belt & Countryside Study, but was also identified as a Potential Development Area. It appeared in the Draft Local Plan (Regulation 18) Consultation of July 2014 as a potential allocation for 660 homes and a travellers' site (Site 78 on the 2016 LAA), but was removed from the 2016 Proposed Submission (Regulation 19) Draft of the Local Plan.

Tangley Place Farm is included within Land Parcel J4, to which the 2014 Green Belt & Countryside Study attributed support for 3 of the 4 purposes of Green Belt:

- 'Checks the eastward sprawl of Fairlands and southward sprawl of Worplesdon;
- Prevents the settlements of Fairlands and Worplesdon from merging;
- Minimal existing development therefore safeguards the countryside from encroachment.'

Tangley Place Farm is divided from the bulk of Land Parcel J4 by the brook to the west which is a natural physical boundary. It has a closer relationship with Land Parcels J3 and J1 than with land to the north west of Fairlands which makes up the bulk of Land Parcel J4 and which influenced the area's appraisal in the Green Belt & Countryside Study as containing Fairlands and preventing its merger with Worplesdon.

There is a clear case for modifying the Green Belt boundary to exclude both of the above sites (Land Parcels J1 and J3) and land west of Tangley Lane (within Land Parcel J4), with a modified Green Belt boundary running north-south along the natural physical boundary of the brook between Worplesdon Road (A322) and Gravetts Lane. This case was made in representations by SLP on the 2016 Local Plan consultation.

The case is strengthened by the proposed allocation of land north of Keen's Lane and by the case for the allocation of land at Liddington Hall Farm, which was presented by Indigo Planning on behalf of the Guildford College Group in response to the consultation on the 2016 Proposed Submission Draft of the Local Plan. The case for Liddington Hall Farm is likely to be maintained in response to the consultation on the 2017 Proposed Submission Draft.

It is clear that Tangley Place can make a useful contribution to meeting the Borough's housing requirements without significant harm to the purposes of the Green Belt.

In the light of these considerations:

- Section 3 below describes the site and its context, including the findings of preliminary transport studies.
- Section 4 presents the findings of a Landscape and Visual Impact Assessment.
- Section 5 describes opportunities and constraints presented by the site, including findings of specialist studies on the ecology of the site, flood risk and drainage, archaeology and heritage assets.
- Section 6 considers the principles for development of the site, based on this assessment, including the avoidance and mitigation of any adverse impacts of development on the site and the surrounding area.
- Section 7 summarises conclusions of this report about the development concept for Tangley Place and relevant changes that will be required in the draft Local Plan.

SECTION 3

SITE LOCATION

THE SITE AND ITS CONTEXT



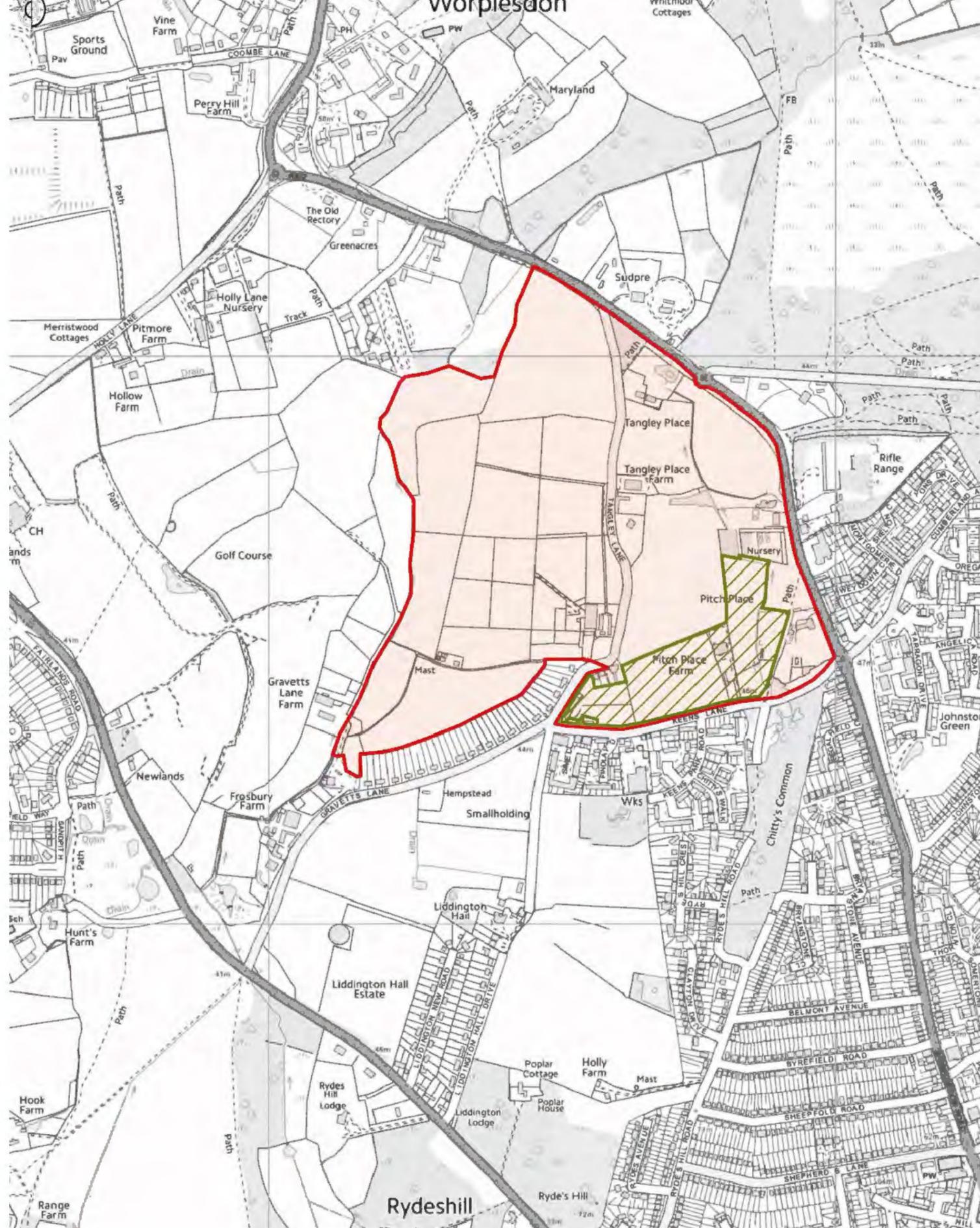
The Site

Descriptions of the site and its context are taken mainly from the Landscape and Visual Impact Assessment, which is summarised in Section 4, and from other reports as stated.

Tangley Place lies within a wider area of land covering approximately 45.52 hectares, defined by the A322, Worplesdon Road to the north and east; Keen's Lane to the south east; the rear boundary of residential gardens on Gravetts Lane to the south; and a local watercourse and associated vegetation, including a short belt of trees, to the west. It is located approximately 4.9 km north west of Guildford town centre.

At its western edge the area comprises a series of small to medium scale, irregular shaped field enclosures, which are bounded by thin hedgerows augmented by occasional trees, and primarily used for paddock grazing. Gravetts Lane Stable and Farm lie in the south-east corner of the site and includes several farm buildings, stable blocks and manèges. Tangley Lane dissects the site from north to south with Tangley Place Farm located on the eastern side of the lane. Several large residential properties and Worplesdon View Care Home are located along Worplesdon Road in the eastern and northern part of the site, set back in large plots. A small public open space lies along Worplesdon Road close to the south-east corner of the site with the public bridleway connecting Worplesdon Road to Keens Lane.

The landscape context of the site is influenced by the transition between the extended urban environment of Guildford, including the village of Worplesdon to the north-west of the main settlement area, into the wider landscape to the north and northwest. To the north-east, Whitmore Common forms a large area of public open space that is crossed by a number of public rights of way. To the north-west, areas of agricultural land lie to the north of Worplesdon Road beyond which are Cobbett Hill and Cobbett Common, further areas of publically accessible open space. A more detailed description of the landscape components, character and visual amenity of the study area are included in the separate LVA report.



SITE LOCATION PLAN



Designated Areas

The site is located within an area that is currently designated as Green Belt. The extent of the Green Belt in this area is currently under review as part of the new Local Plan (See Figure 1, Site Location and Planning Designations).

Part of the site falls within the 400m buffer zone for the Whitmoor Common Special Protection Area (SPA) which is protected as part of the Thames Basin Heaths SPA and is also designated a Site of Special Scientific Interest (SSSI) and a Local Nature Reserve. The rest of the site is within the 400m-5km buffer zone for the SPA.

There is a Countryside Rights of Way (CROW) area to the north west, across the SPA and surrounding common land. There are further areas of CROW land to the south east across Chitty's Common and further south adjacent to the village of Fairlands is a large area that covers Broad Street Common 500m south-west of the site.

The Surrey Hills Area of Outstanding Natural Beauty (AONB) is located over 3.5km to the south of the site. However due to the combined effect of distance, landform and vegetation cover, including the nature of the surrounding settlement pattern, there are not likely to be any impacts on this designated area.

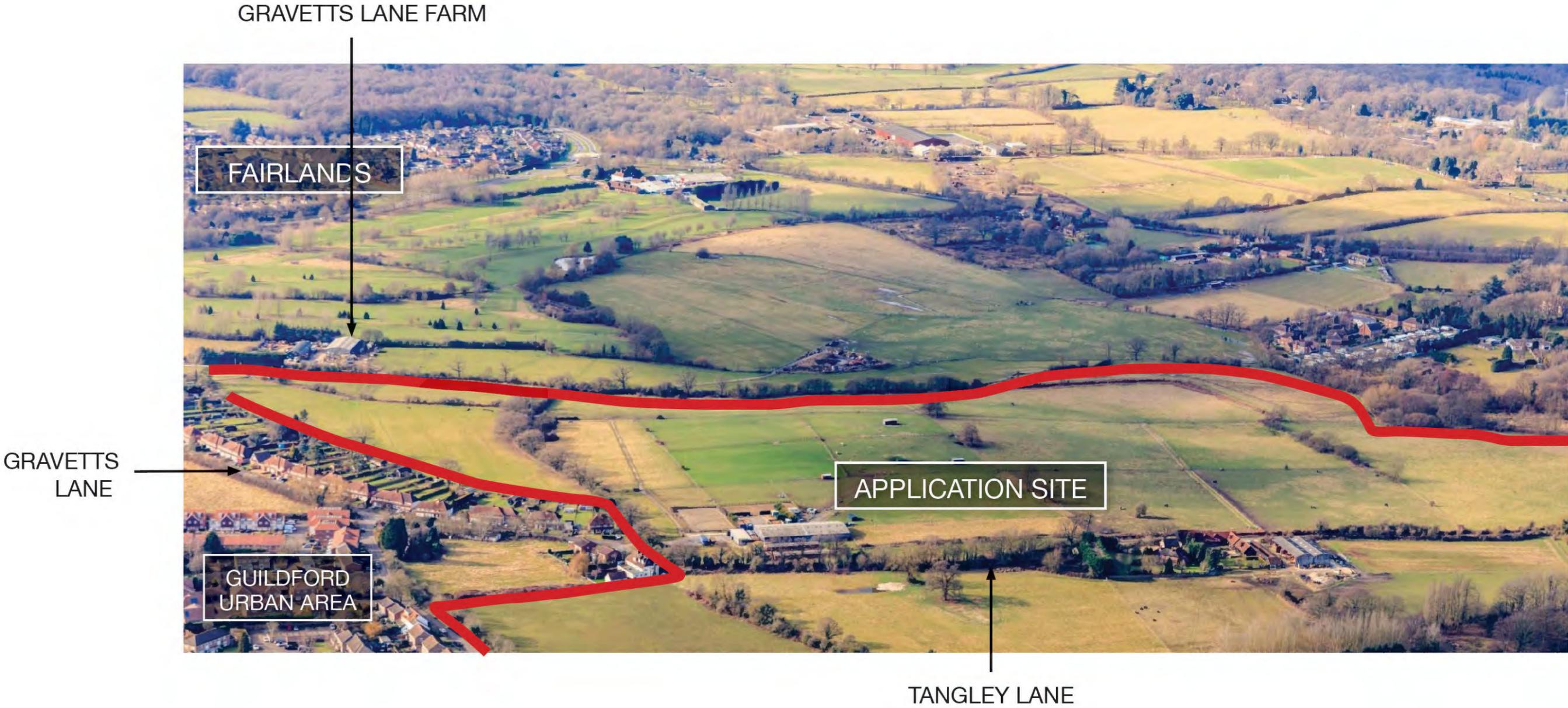
Topography

The site is located on the south-east side of the lowland valley situated between the settlements of Guildford and Worplesdon. The watercourse running along the western site boundary forms the lowest part this lowland valley and creates a natural barrier that contributes to the separation between the site and the landscape setting to the west (Figure 3, Topography).

The highest part (c. +46m AOD) of the site lies at the southern end of Tangley Lane and extends to Tangley Place Farm in the centre of the site. A small area around Keens Lane within Site A22 +50m AOD and forms the highest point of the wider area. From here the landform falls generally west/north-west towards the watercourse and Worplesdon Road. The northern part of the site is relatively flat with the ground level below c. +40m AOD.

Whilst no parts of the site are slope steeply enough to be expected to cause issues from an engineering perspective, the raised portions to the site do result in some portions of the site being more visually exposed than others. This is addressed in more detail below and within the accompanying Landscape Report.

AERIAL IMAGE SHOWING THE RELATIONSHIP OF THE APPLICATION SITE WITH THE GUILDFORD URBAN AREA, FAIRLANDS AND GREEN BELT



Hydrology and water features

The western boundary of the site is an unnamed watercourse that is mostly well vegetated except for a small section in the middle. The Flood Map for Planning on Environment Agency's website shows that the site is essentially located in 'Flood Zone 1, low risk of flooding'. There are small areas of Flood Zone 2 & 3 associated with this watercourse on the western boundary of the site, outside the development area. There are three large ponds in the east of the site in the farmland surrounding Tangley Place Farm which are covered by dense vegetation. Some field ditches also appear in this area making connections between the ponds.

In the wider landscape the River Wey flows through an east/west oriented valley, about 2km south-east of the site and continues to form a tributary of the River Thames.

Vegetation

Vegetation on site consists of paddocks/pastures, field boundary vegetation, and small groups of trees and woodland. Hedgerows vary in height, degree of management and age. Large mature trees are sparse along the field boundaries, either individually or as groups. Small woodland areas are located at the north-east corner of the site and provide green infrastructure connections to the neighbouring Whitmoor Common. A belt of trees located along Keens Lane links to the adjacent Chitty's Common. Generally, tree coverage is much higher on the eastern part of the site, providing a continuous vegetated corridor connecting Whitmoor Common and Chitty's Common. Overall the site retains a strong sense of enclosure by existing vegetation.

In the wider area, vegetation in the rural landscape to the immediate south and west of the site is similar to that on the site. Vegetation in the Whitmoor Common to the north east of the site shows is much denser. The vegetation in Rokers Golf Course is in its early years of establishment and under the layout of the golf course offers a completely different pattern.

There are a number of woodland blocks across the study area, focused on the large areas of common land to the north-east at Whitmoor Common, to the north-west at Littlefield Common and to the south-west at Broad Street Common. These woodland blocks are mature and well established. They provide a sense of enclosure across the higher ground, screening views of existing development.

Roads tend to be edged by woodland and due to the extent of this network there is a strong framework of trees and woodland which characterise the area.

Existing Land uses

The current use of land to the west of Tangley Lane is farmland with a significant portion occupied by equestrian uses. The site comprises a number of small to medium regular and irregular shaped fields, which are bounded by a combination of thin hedgerows and trees and post and rail fences and are used by the stables for grazing. The buildings of Gravetts Lane Stables and Farm buildings are within the area.

To the east of Tangley Lane there are a number of different land uses including Tangley Place Farm, Worplesdon View Care Home, several large residential properties to the east and north set in large plots along Worplesdon Road, and a plant nursery close to the eastern boundary. A small public open space also lies along Worplesdon Road with a public bridleway connecting Worplesdon Road to Keens Lane. The south eastern part of the area north of Keens Lane is a proposed housing allocation: Policy A2 of the 2017 Proposed Submission Local Plan.

The built-up area of Guildford defines the south-eastern extent of the study area with a number of smaller settlements scattered across the countryside to the north and west, including Fairlands and Worplesdon. Large areas of publicly-accessible open space lie in the northern extent of the study area, including Whitmoor Common in the north-east which is within the Thames Basin Heaths Special Protection Area (SPA); an area of land with Countryside Rights of Way (CROW); Cobbett Hill Common to the north-west which is also in the Thames Basin Heaths SPA; and separate areas of ancient woodland. Beyond these areas of development and open space the majority of the remaining landscape is in mixed agricultural use

TRANSPORT

Transport & Facilities

A preliminary transport appraisal of Tangley Place has been undertaken by Transport Planning Associates (TPA). The appraisal concludes that the proposed scheme could be served by a single vehicular, pedestrian and cycle access from Tangley Lane.

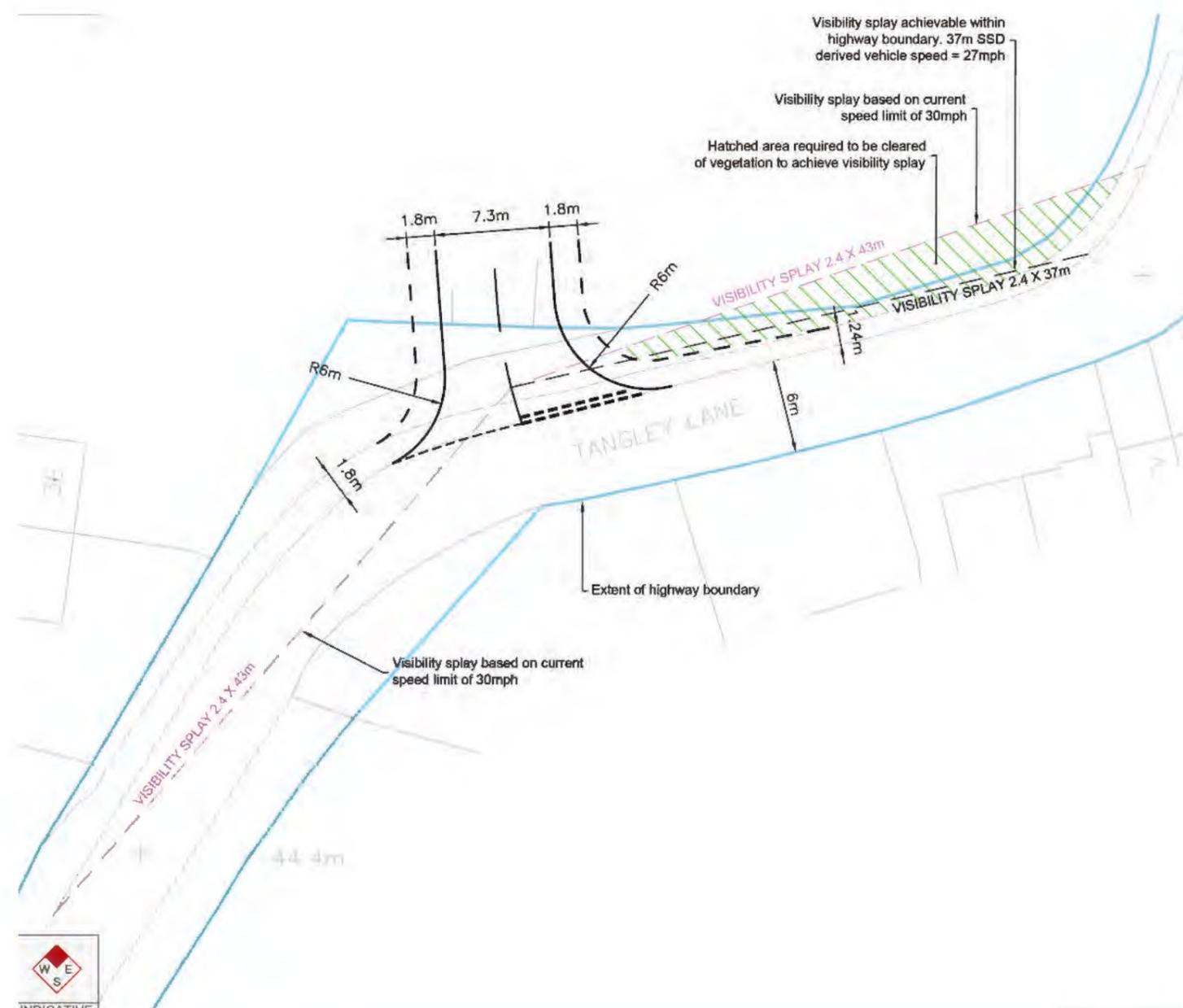
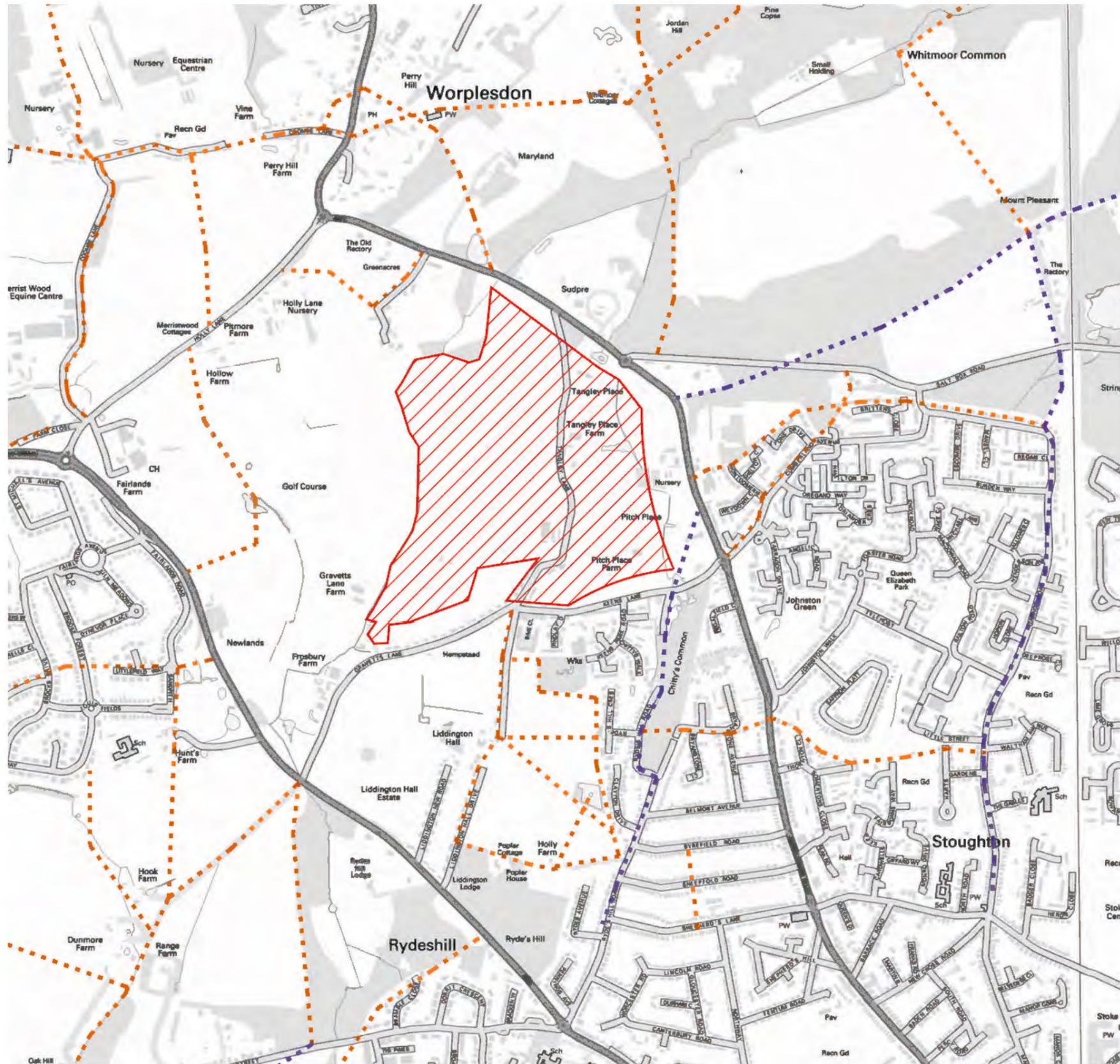


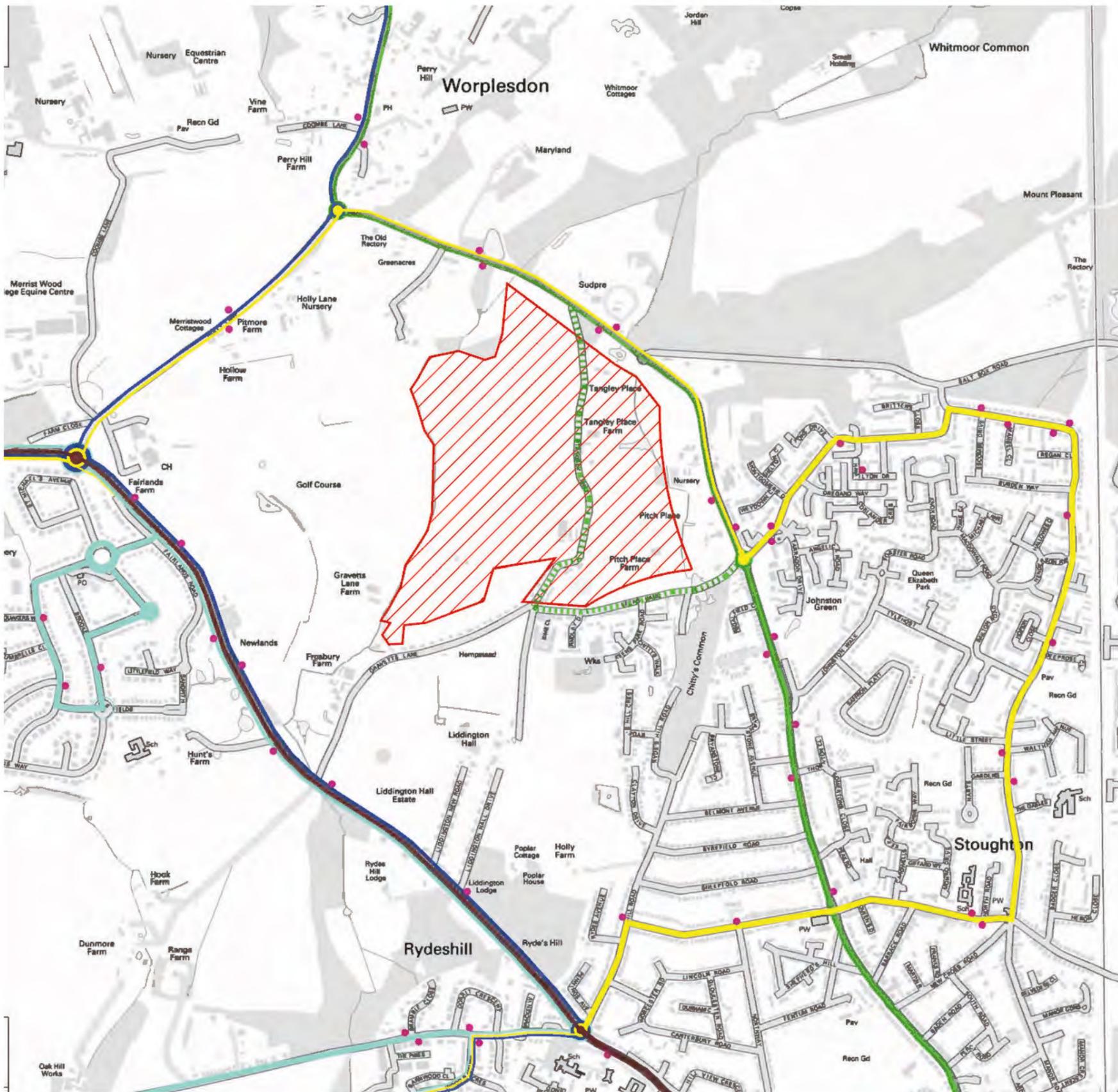
FIGURE 3.0: PRELIMINARY ACCESS JUNCTION



A second pedestrian and cycle access point could also be delivered to serve the scheme at the site's eastern boundary with Tangley Lane to facilitate direct and safe pedestrian and cycle connections from the development to nearby key destinations, including bus stops on the A322 Worplesdon Road and Guildford town centre.

Continuous footways around 1.5 to two metres wide are generally located on one or both sides of residential streets within the vicinity of the site. These routes provide access to and from Guildford town centre and the surrounding residential areas. There are existing Public Rights of Way (PROW) providing access to common land at Whitmoor Common to the north of the site. Existing PROWs can be accessed via Keens Lane. Footpaths FP466, FP432 and FP433 provide pedestrian connections through the Common and terminate at the A322 Worplesdon Road to the north of the site. To the south, footpath FP445 provides access to Chitty Common and terminates at the sites southern boundary, at the Tangley Lane/Gravetts Lane/Keen Lane mini roundabout junction. A PROW bridleway BW444 is located to the east of the site and joins Whitmoor Common to Chitty's Common to the south of the site. The location of PROWs is shown in Figure 3.1

FIGURE 3.1: EXISTING WALKING AND CYCLING NETWORK



Existing local buses provide services with an average journey time of approximately 13 minutes to Guildford town centre, which is approximately 4.9 kilometres distant. The nearest existing bus stops are located on the A322 Worplesdon Road directly to the north of the site boundary, approximately 600 metres from the site at Salt Box Lane. Services are operated by 'Buses Excetera' and provide an hourly service between Guildford, Woking and Chobham, Monday to Saturday, between 0700 and 1700. The overall frequency is one bus every hour in each direction, throughout the day. The local bus network is shown in Figure 3.2.

FIGURE 3.2: EXISTING LOCAL PUBLIC TRANSPORT NETWORK

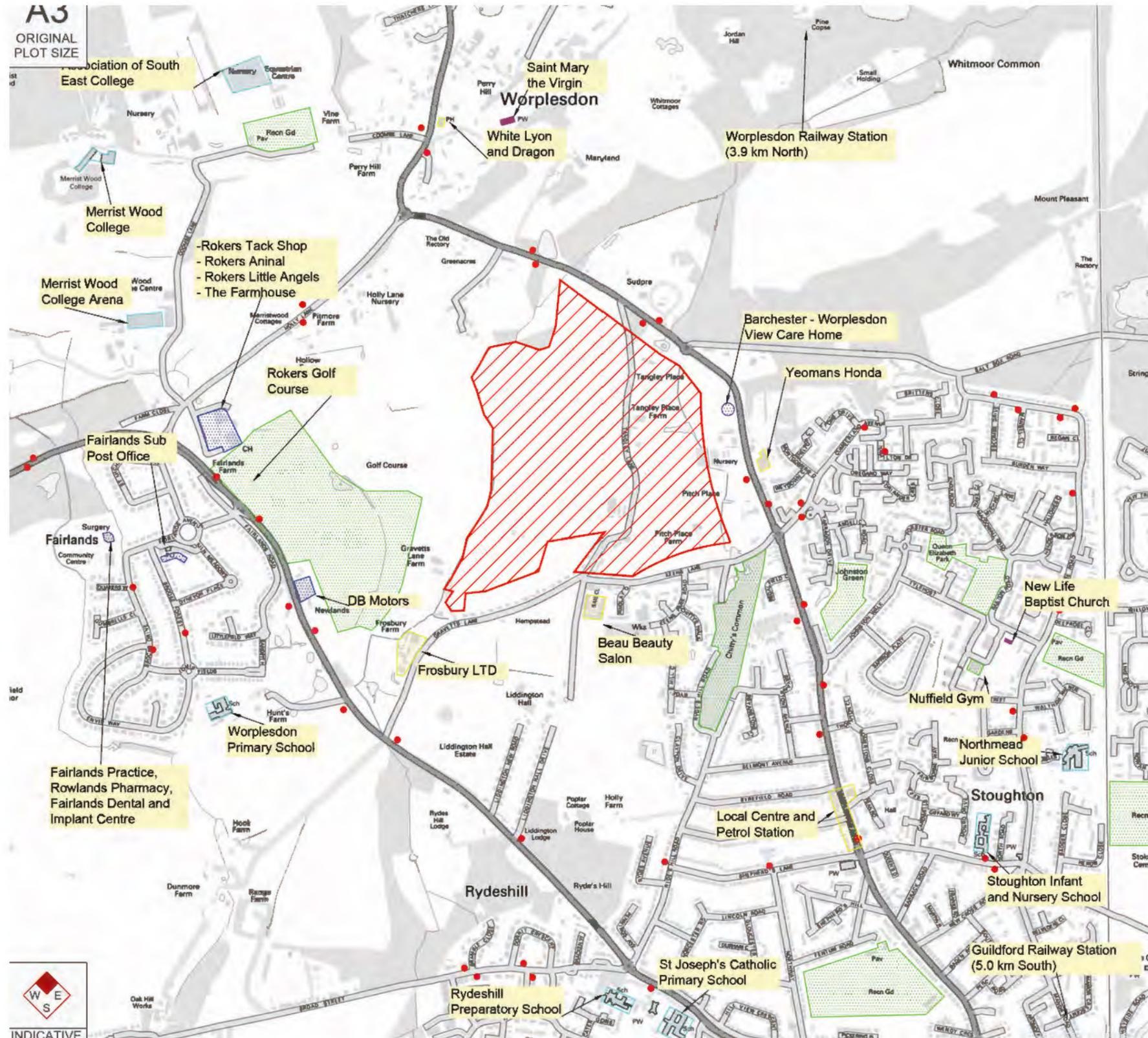


FIGURE 3.3: LOCAL FACILITIES AND AMENITIES

The local bus operator Buses Excetera (sic) has confirmed that it would be keen to service new housing developments and that it should be feasible to service the proposed development with existing bus services operated by Buses Excetera that are routed on the A322. The diversion of existing bus services into the site and the provision of closer bus stops will also benefit existing residents on Keens Lane and Gravetts Lane.

The Guildford Borough Transport Strategy (2016) envisages cycling improvements by means of a Sustainable Movement Corridor on the A322 Worplesdon Road and a park and ride site to the north of Guildford.

The nearest railway station to the site is Worplesdon located approximately 4.2 kilometres northeast of the site. Worplesdon station is located on the Portsmouth Direct Line between Woking and Guildford and provides direct services to London Waterloo and Portsmouth Harbour, approximately every 30 minutes during peak periods. Brookwood station is located approximately 5.5 kilometres north of the site and is on the Waterloo to Basingstoke Line providing a direct service to London Waterloo every 15 minutes. Brookwood station is also accessible from the site by bus with a journey time of 17 minutes from bus stops on the A322 Worplesdon Road.

Accessibility to local services and facilities reflects the site's location on the edge of the urban area and most are more than 2km walking distance, although for many journey purposes travel distances will be shorter than National Travel Survey averages. Adjoining developments, and particularly the proposed site allocation north of Keens Lane, will present opportunities to enhance pedestrian and cycle route connections to facilities within the urban edge. **Local Facilities and Amenities are shown in Figure 3.3**

The preliminary assessment carried out by TPA concludes that the impacts of the scheme at Tangley Lane can be accommodated on the wider highway network without the need for any material highway improvements. Available information (from the Rokers planning application) suggests that there are unlikely to be significant impacts on the A3 or Highways England's scheme for its improvement through Guildford (contrary to assertions in the Housing Topic Paper). However, a detailed impact of the development site will be subject to addressing detailed issues in a Transportation Assessment and Travel Plan that would accompany a planning application for the site.

Off-site improvements could include improvements to Tangley Lane and the provision of new bus stops. Development of the proposed site allocation north of Keens Lane is expected to result in improvements to Keens Lane).

SECTION 4 LANDSCAPE

SCOPE OF THE LANDSCAPE AND VISUAL IMPACT ASSESSMENT

A landscape and visual impact appraisal (LVA) has been undertaken by landscape architects from Pegasus Group, as an independent report, to determine the various landscape and visual opportunities and constraints relating to the site and its context, and how these might influence the development potential of the site through the preparation of a masterplan and landscape strategy, including a landscape mitigation strategy to avoid, reduce or remedy adverse impacts.

The LVA considers landscape character, including the physical landscape resources, and the views and visual amenity experienced by residents, recreational users and road users. It has been prepared in accordance with the principles and good practice for landscape and visual impact assessments set out in the Landscape Institute (LI) and the Institute of Environmental Management (IEMA) Guidelines for Landscape and Visual Impact Assessment, Third Edition (2013); Natural England (2014) An Approach to Landscape Character Assessment; and Landscape Institute Advice Note 1/11 Photography and Photomontages Guidance. Reference is also made to a number of additional sources of information. The LVA also considers relevant policies, including the European Landscape Convention (2004). The National Planning Policy Framework, Planning Practice Guidance local planning policies and supplementary planning guidance, including draft policies of the emerging Guildford Borough Proposed Submission Local Plan: Strategy and Sites (June 2017).

The spatial scope of the LVA is determined initially by reference to the area of landscape that may be affected and from which the proposed development may be visible. Following the early stages of desk study and field work, this broad area of search has then been refined to an approximate radius of 1.5km from the site. This is considered sufficient to account for the likely impacts that will be generated by the proposed development. In some specific instances it has been necessary to vary this distance in order to consider the potential for impacts on specific landscape resources or from specific long distance viewpoints.

The professional judgements in this LVA consider landscape and visual effects in the short term, at completion, but also in the longer term after fifteen years when mitigation measures (such as planting) will have matured and the mitigation measures are likely to perform the intended function (for example, screening or enhancement of landscape infrastructure).

Landscape Character

Aspects of local landscape character which are described in more detail in the LVA, consistent with published guidance in local landscape character assessments, include:

- Rolling low land formed by local watercourses, often with dense vegetation corridors and the River Wey;
- Small to medium scale mixed land use including pasture/paddock grazing;
- Large woodland blocks and mature tree belts, often on high ground and linked by field boundary hedgerow;
- Large areas of common land and historic parkland edged by mature woodland boundaries;
- Small fields enclosed by hedgerow and tall lines of trees with post and rail fences divide horse paddock areas;
- Outside of the main urban areas, low density housing with large established gardens form the smaller village settlements and individual isolated farmsteads; and
- The Roker's Golf course to the west and areas of parkland to the north provide open views across areas of countryside to the urban edge.

Visual Baseline

The western part of the site is the most exposed with both short and middle distance views possible from properties along Holly Lane, Worplesdon Road and Gravetts Lane. These include receptors engaged in outdoor recreation, and vehicle users passing along A322, Holly Lane and Worplesdon Road. The views from properties in the Fairlands settlement are, in general, screened by the vegetation both along A323 and in the surrounding network of fields. There is a limited number of PROWs in this area therefore there are limited views available across the site from publicly-accessible areas, beyond those from the road network.

From the south, the majority of views from residential properties, south of Keens Lane towards the site are screened by tall vegetation along Keens Lane and properties on Gravetts Lane. Such properties with rear gardens facing the site boundary are likely to have clear views to the site. However, the visibility of the site, when travelling along the roads, is generally screened by the built form and vegetation.

From the east, the visual envelope of the site is contained by the urban edge of Guildford at Stoughton, including the tree belts along the Worplesdon Road.

The village of Worplesdon is situated on a higher ground (c. +60m AOD) to the north of the site. Potential views are very restricted due to the intervening large woodland block and varied vegetation throughout this area of landscape. From the north, the small woodland at the north-east corner of the site restricts views towards the site from vehicle users and people walking along Worplesdon Road. However, as the landform drops and vegetation becomes less prominent, views to the site become more open towards the north-west corner of the site. These views are likely to be perceived by residents living on Worplesdon Road, users of the public footpath, and vehicles travelling along Worplesdon Road.

A number of possible long-distance viewpoint locations have also been visited, including public footpaths to the north of A31 within the Surrey Hills AONB. However, the site is not visible from those locations due to the combined effect of distance, topography and the position of the site within a complex network of vegetation and infrastructure.

Within this overall visual envelope there are variations in the degree of inter-visibility between areas and in the nature and extent of views. Given the scale of the site, its visual envelope and potential influence on the wider landscape is considered to be very limited.

Representative viewpoints and visual receptors are described and illustrated in the LVA.

Context

The site is located directly adjacent to the north-west urban edge of Guildford and the suburb of Stoughton. To the south and east it is clearly defined by the urban edges, including the highways corridor of Gravetts Lane and Keens Lane to the south, and Worplesdon Road to the east, extending around the northern site boundary. To the west, in the context of a transition to the wider countryside, the site is defined by the physical landscape components of the water course and its associated linear green infrastructure.

The SPA buffer in the northern extent of the site limits the potential for built development and therefore forms a natural area of open space that can accommodate a number of different uses in relation to green infrastructure and mitigation, including surface water storage. It also means that the proposed development will be sited in the southern land parcels of the site. As a result, the site forms a natural extension to the existing settlement pattern connecting to the south and west of Stoughton. This also provides a transitional area to the wider countryside towards Worplesdon Road.

Development Potential

On the basis of the landscape and visual analysis and the constraints identified, it is considered that there are two important issues in respect of development potential where landscape and visual matters are concerned: first, the need to identify the extent of an approximate 'development envelope'; and second, the need to establish a robust and enduring landscape framework to balance with that envelope.

The area has the potential to accommodate up to about 350 dwellings, landscaping, public open space and other green infrastructure including Suitable Alternative Natural Greenspace (SANG) to help mitigate the potential impacts of development locally on the SPA, and surface water storage.

The existing green infrastructure is extensive and should be retained, where possible to provide a framework across the site to screen development and direct important views across the site to the distant AONB. The locations of listed buildings should be considered in determining the spatial extents of the development envelope. Developing a detailed design will give additional consideration to the appropriate and sensitive treatment of these assets.

Development should draw on the local landscape character and the perception of undulating low-lying landscape with established vegetation that screens and filters views towards the urban edge of Guildford at Stoughton. It is important to create new landscape buffers, including vegetation belts to the north and west within areas of open space to ensure this character is maintained. This will create a gradual transition between the settlement edge and the wider countryside and allow the proposed development to integrate into the surrounding landscape.

Landscape and Design Strategy

Following initial stages of the LVA, the development framework for the site has been informed by reference to the constraints and opportunities, incorporating the following components:

Development Envelope

The development envelope for the site pays particular attention to a number of landscape-related constraints and opportunities; this includes the internal vegetation structure of hedgerows and hedgerow trees and the opportunity to retain long distance vistas from the site (and from the A322 further north) toward the ridgeline of the Surrey Hills AONB. The SPA/SSSI buffer, although it is predominantly an ecological designation, has the benefit of restricting the development envelope to the north of the site, thereby providing additional offset to the south-east corner of Worplesdon Conservation Area.

A key matter for defining the limits of the development envelope is the creation of a robust western boundary to the site. This is formed by the alignment of the watercourse and associated linear tree belts. This existing physical landscape feature can then be augmented through proposals for additional green infrastructure and open space which further restrict the western edge of the development envelope to ensure that the boundary of the site is robust and defensible in the long term. This approach also ensures that there is physical and visual containment of the site on its western edge to balance that provided by existing green infrastructure and settlement to the south, east and north.

Green Infrastructure Strategy

Analysis of the existing green infrastructure network (with reference to the PROW network also) has identified a series of strategic green infrastructure links. In response to this analysis the development cells have been shaped by the existing field pattern, including their enclosure by hedgerows, tree belts and woodlands and the SPA buffer zone. This ensures that the existing vegetation, and the scale and pattern of the landscape, is integrated into the layout.

As a result, the existing green infrastructure across the site is largely retained. This provides an immediate structure to the landscape strategy and helps to shape the network of green infrastructure links across the site.

Retained green infrastructure will be reinforced and enhanced through additional landscaping and improved management, the aims of which will consider location, function and also biodiversity objectives. The approach includes consideration of 'stand offs' to trees and hedgerows which will help to avoid potential impacts on the root protection zones of these elements, helping to ensure they are retained in the long term.

The LVA process has identified the sensitivity of the western edge of the site due to its position within an area of more open countryside that allows views towards the Surrey Hills AONB. This area would also form the new Green Belt boundary as it is delineated by the watercourse and its associated tree belt providing a suitable, permanent and defensible boundary.

The green infrastructure strategy therefore includes a substantial buffer along the western edge of the site. Physically, this restricts development cells (and the built form within these) back from the watercourse and will either fully screen or reduce the prominence of any proposed development in these areas. This area will include a diverse range of landscape structure planting and open spaces to create an enduring green edge to the settlement and to present an appropriate, integrated transition between the urban edge and the wider landscape.

The area of open space through the centre of the site will be an area of SANG. This will be designed to provide an enjoyable natural environment for recreation as an alternative to the Thames Basin Heaths SPA to the north. It has potential to include formal recreational facilities (for example, play areas and surfaced routes), and informal recreational spaces. The open space will also include an area for surface water storage to control the rate of discharge to the watercourse. Existing vegetation will also be retained through this space whilst an area of new structural planning will be introduced to provide a landscape buffer to the northern extent of the development envelope limiting and screening views of the proposed development.

Public Access

There will be an increase in public access across the site, as a number of new PROWs will be incorporated into the layout. As well as formal routes there will be informal routes through the SANG area providing additional connections across the green infrastructure and open space network.

Landscape Design and Mitigation of Visual Impacts

Detailed design should include a high quality landscape scheme that incorporates private garden space and streetscape including street and garden trees. Over time these will contribute to the green infrastructure framework across the site, enhancing the character and integration of the site with the surrounding landscape.

There may need to be some losses of vegetation, such as hedgerows, however these can be targeted to exploit existing breaks in vegetation and/or vegetation which is in poor condition.

Other landscape impacts will be limited to the change in the land use of the site, from the existing paddock land to that of a residential neighbourhood. Although this will occur across a large proportion of the site, this change will be contained to the site and set in the context of the settlement edge of Stoughton.

At a local level the changes will result in an extension to the settlement edge of Stoughton (to the east), however this will not largely be perceptible from the wider landscape and will not result in adverse effects to the overall local landscape character of the 'Wooded Rolling Claylands (LCT)' and 'Wanborough Wooded Rolling Claylands (LCA)' which is the defined character area for the wider rural landscape

surrounding the western edge of Guildford.

Other specific changes in terms of landscape elements and features will be positive; including strategic landscape planting to augment the existing green infrastructure network and landscape planting associated with proposed open spaces (for example, but not limited to, landscape planting along the western corridor of the green infrastructure and buffer on the northern edge of development).

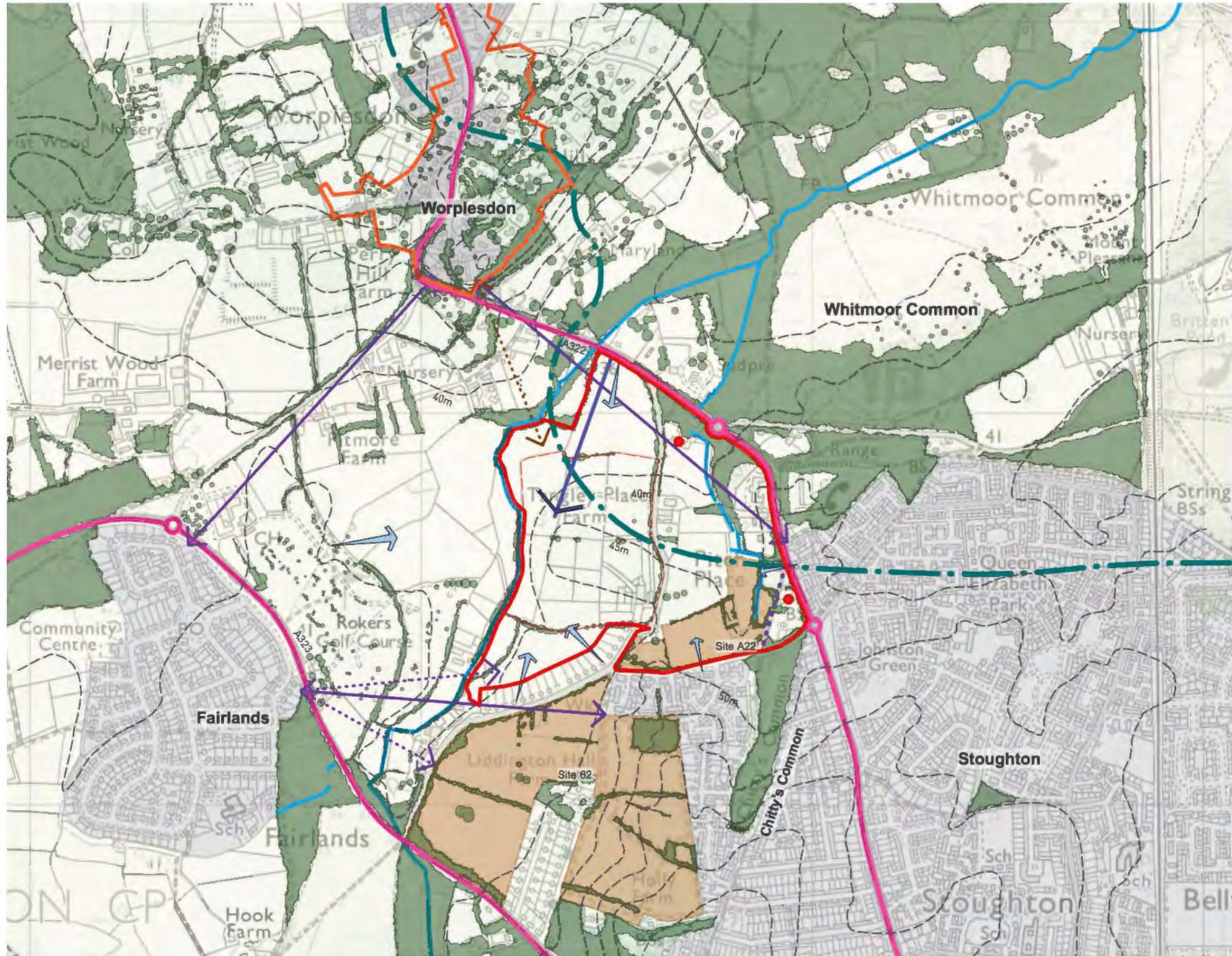
The PROW network across the site will be subject to visual impacts of varying degrees. This will include some middle distance views towards the proposed development; however the existing intervening landscape and vegetation combined with proposed open space and buffer planting will ensure effective screening of built form. Given that the inherent nature of the proposals for the area is that of a sustainable urban extension, any settlement fringe location is likely to be subject to a similar range and degree of visual impacts.

The baseline assessment identifies the relative containment of the site within the pocket of landscape between Stoughton (to the east), Worplesdon (to the north-west) and Fairlands (to the south-west); it highlights that the localised, well-vegetated ridgeline at the village of Worplesdon, vegetation framework and low-lying undulating landform upon which the site lies which provide a framework upon which a robust and enduring buffer to the settlement edge and Green Belt boundary can be developed. It is these features that also contain the site visually and limited the extent of potential views from the wider landscape.

The Landscape and Visual Impact Appraisal concludes that development proposals for this area can provide a

sensitive response to the opportunities and constraints. A degree of landscape and visual impact is inevitable with the development of any greenfield site. However in this case development can be achieved with a very limited impact on the immediate site and with a negligible impact on the surrounding area and wider landscape. As a result, development is considered to be acceptable in landscape and visual terms.

Although it is not specifically a landscape element, the LVA also concludes that realignment of the Green Belt boundary to follow the watercourse at the western boundary of the site can deliver a robust, permanent and defensible edge to the Green Belt through a clear transition between settlement area, including the open space and planned buffers, and the wider countryside.



LANDSCAPE CONSTRAINTS



KEY

	Site boundary
	Existing road infrastructure
	Existing public right of way
	Existing listed building
	Existing watercourse
	Existing public open space
	Existing vegetation / green infrastructure
	Housing allocation sites
	Proposed development cells
	Potential primary school site
	Potential vehicle access point
	Potential vehicular access
	Potential footpath network
	Potential green corridors
	Potential landscape buffer planting
	Potential location for SANG
	Potential location for cemetery
	Views to Surrey Hills AONB retained

LANDSCAPE STRATEGY

SECTION 5

CHARACTERISTICS & CONSTRAINTS

OPPORTUNITIES AND CONSTRAINTS

Ecology

Ethos Environmental Planning has completed a Phase 1 Ecology Survey of the site. The survey and mapping drew on guidance provided in the Handbook for Phase 1 Habitat Survey - a technique for environmental audit (JNCC 2010). The Phase 1 habitat survey was carried out on 11th April 2017. It incorporated a detailed assessment of land within the development boundary, including a description and mapping of all key features and habitat types. The survey was carried out to identify the range of habitats within the site and the predominant and notable species of flora.

A background data search was carried out in accordance with the Guidelines for Accessing and Using Biodiversity Data, CIEEM (2016) and Guidelines for Preliminary Ecological Appraisal, CIEEM (2013). A search for notable sites and species within a radius of 1km from the site perimeter was assessed as being appropriate considering the scale of development and characteristics of the surrounding landscape.

Habitats on site comprise semi-improved grassland and hedgerows which were assessed as having low to moderate ecological value. The majority of habitat was improved grassland with very low species diversity; heavily grazed by horses, keeping it to a short sward with common grassland flora. Overall, the grassland was assessed to be of negligible ecological value.

Dense scrub was located in the south of the site. The scrub was dominated by bramble and, whilst it was botanically-poor, this area provides potential habitat for protected species such as breeding birds, reptiles and hedgehogs.

There was a small area of amenity grassland located in the south-east of the site. There was negligible botanical diversity in this habitat and it was assessed as having negligible ecological value.

Some of the hedgerows were fringed with tall ruderal. Whilst botanically poor, this habitat provided potential foraging ground for reptiles. It is recommended that this habitat is retained where possible. However, if the development seeks its removal, it will be possible to compensate for its loss within the proposed areas of open space and SANG.

The stream along the western boundary was assessed as having potential for water vole and foraging and commuting bats. It is recommended that further surveys are carried out for these protected species and this will inform the need for further mitigation and compensation measures. The draft development proposals include the retention of the stream with a landscape buffer and, therefore, recommendations will include enhancement measures for this habitat feature.

The site was assessed as having potential for reptiles, commuting/foraging bats, water vole, badger, nesting birds and hedgehogs. Recommendations for mitigating impacts of the development and, where necessary, for further effort are made in relation to these species in the Phase 1 Ecology Survey.

Draft development proposals have been informed by the initial ecology assessment and the more important habitat features such as hedgerows are being retained and enhanced. The proposals also provide opportunities for ecological enhancements such as wildflower areas, tree and hedgerow planting, and providing features for a range of faunal species such as bats and birds

Flood Risk and Drainage

Studies of drainage and flood risk, undertaken by Clive Onions, consulting civil engineer, have identified that the site is located in Flood Zone 1, at low risk of flooding, according to the current Environment Agency (EA) Flood map for Planning. This classification is consistent with the site's location on sloping terrain. Residential development is therefore appropriate in terms of the National Planning Policy Framework (NPPF) in relation to flood risk. The site is also at low risk of surface water flooding according to the EA Flood risk from surface water, with no ponding or streaming shown to be affecting the site.

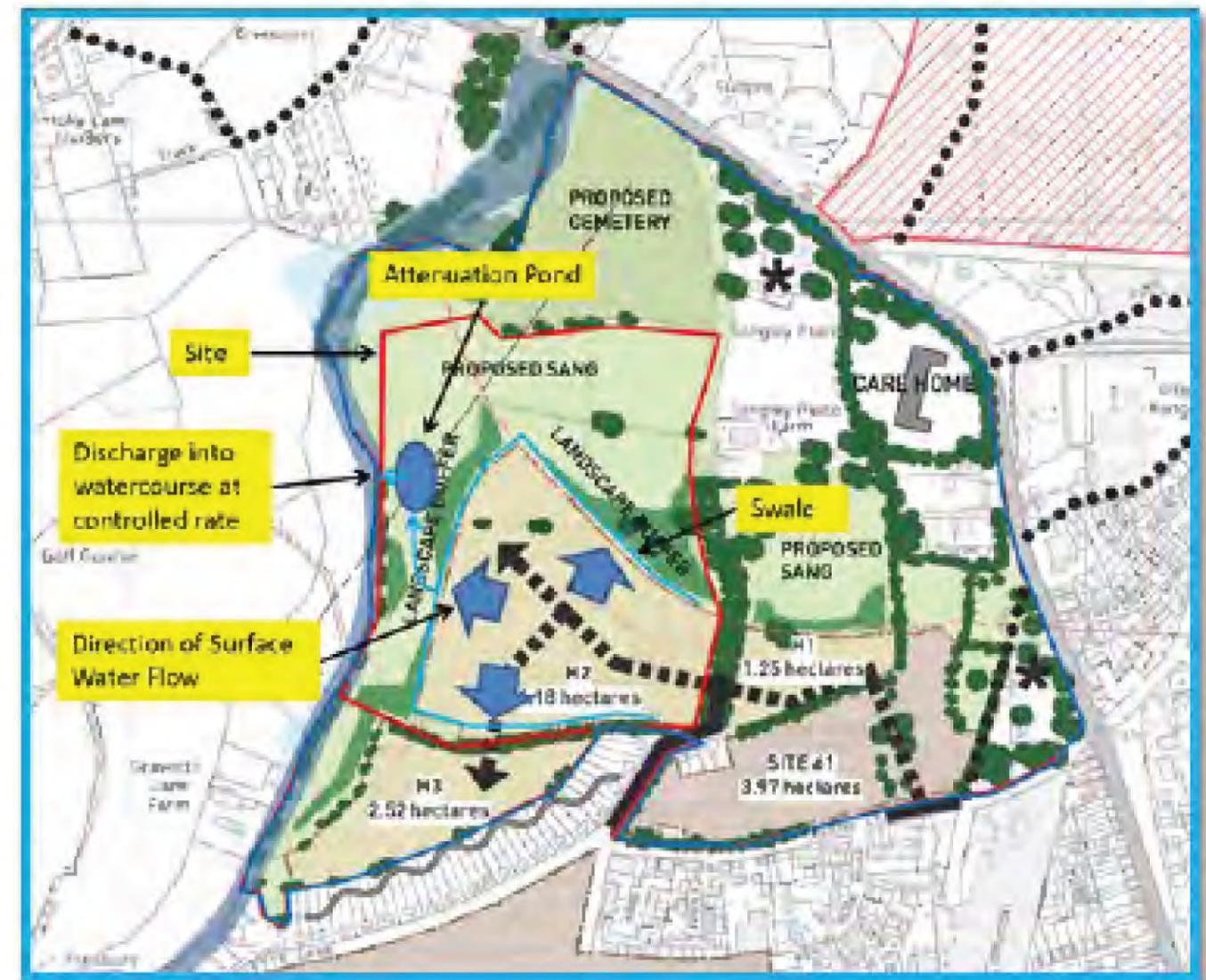
The site terrain is in the form of a gentle ridge, falling to the west with an average gradient of 1 in 40 to a minor watercourse, which drains north and is a tributary of Stanford Brook. The minor watercourse, which forms the western boundary of the site, flows through Whitmoor Common and would not be considered as 'sensitive' in flood risk terms.

Although the ground is shown to be sand, it is likely to be over London Clay according to the British Geological Survey information, and the Cranfield University Soilscapes Map shows the site to display impeded drainage characteristics. The ground is unlikely to be suitable for conventional soakaways, but some infiltration could be possible, and soakaway tests should be undertaken to assess the permeability and to inform the drainage strategy.

Based on the above assessment it is likely that private drives would be formed in permeable paving, with roofs, roads and other paved areas gathered into a gravity drainage system and conveyed to a landscaped attenuation pond west of the development area, with a controlled outlet into the watercourse. The design will meet modern standards and reduce the rate of runoff from a 1 in 100 year event (with climate change allowance) to the greenfield run-off rate, thus reducing flood risk downstream.

Sustainable drainage features will be incorporated into the design, including consideration of perimeter swales to convey runoff to the pond, along the north, south and western edges of the development. Ground with varied levels and planting also encourage infiltration and evapotranspiration, biodiversity and consequently reducing runoff.

The resulting drainage strategy will reduce the rate of runoff from the area, encourage infiltration, improve runoff quality, create new habitats to encourage biodiversity and provide improved amenity, representing the highest targets in the Sustainable Drainage (SUDS) hierarchy and meeting national and local policies with regard to flood risk and drainage.



FLOOD RISK AND DRAINAGE REQUIREMENTS

HERITAGE

Archaeological potential:

A Built Heritage and Archaeological Assessment has been undertaken by heritage consultants from the Pegasus Group, using information from Historic England's National Heritage List, Surrey Historic Environment Record, Surrey History Centre and site visits, in accordance with Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision Taking in the Historic Environment, the NPPF and relevant legislation. Full details are provided in an independent report.

The Assessment provides information on the baseline historic environment of the Site, including an assessment of the contribution of the Site to the significance of designated heritage assets in the environs, and an assessment of the archaeological potential of the Site. This baseline information is intended to provide information on the key constraints to development in the context of an allocation for housing and to inform the design of a future masterplan for the site.

There are no designated heritage assets within the Site. Within the 1 km study area, designated heritage assets comprise:

- Grade II Listed Tangley Cottage and The Bothy, c. 90m northeast of the Site (NHLE ref. 1191873);
- Grade II Listed Pitch Place House, c. 335m east of the Site (NHLE ref. 1029859);
- Grade II Listed Frosbury Farmhouse, c. 445m southwest of the Site (NHLE ref. 1029580);
- Grade II Listed Whites Farmhouse, c. 605m southwest of the Site (NHLE ref. 1377732);
- Grade II Listed Fairlands Farmhouse, c. 725m west of the Site (NHLE ref. 1377734);
- Grade II Listed Hunts Farmhouse, c. 770m southwest of the Site (NHLE ref. 1029575);
- Two Grade II Listed Lodges, associated with Merrist Wood House, c. 840m north west of the Site (NHLE ref. 1029577 and 1029578); and
- Worplesdon Conservation Area, located c. 420m north of the Site at its closest point, containing one Grade I Listed Building and seven Grade II Listed Buildings, located between c.665m and c.900m north of the Site.

No prehistoric, early medieval or medieval finds or features are recorded within the site, which was located in the parish of Worplesdon and, from at the least the medieval period, formed part of the agricultural hinterland to the village of Worplesdon, which is located c.420m north-east of the Site. There are numerous buildings in the wider study area from the post-medieval to modern periods, mainly in the village of Worplesdon, but also post-medieval farmhouses in the vicinity of the site.

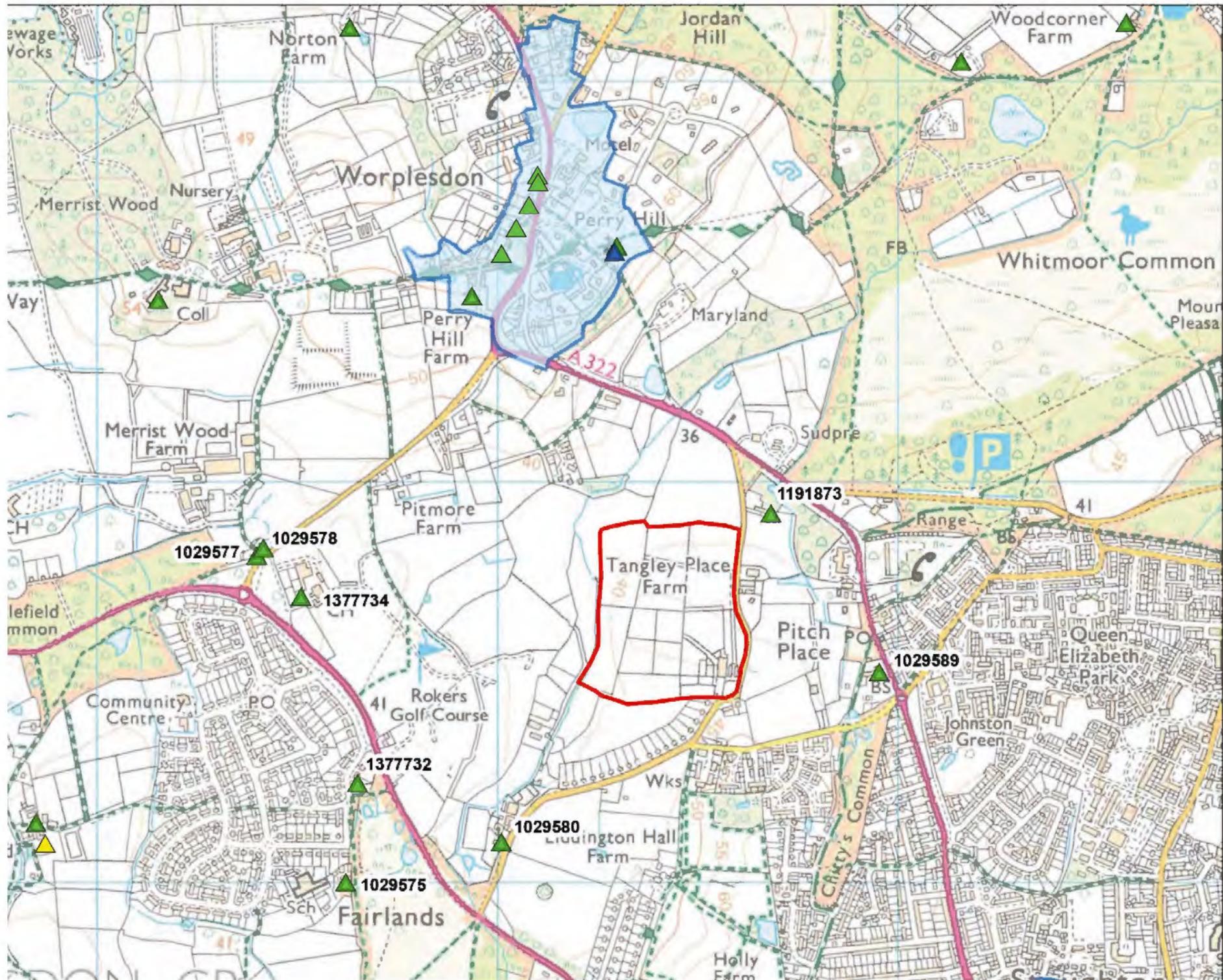
The potential route of a Roman Road which connected London to Winchester crosses the site in a northeast to southwest direction. At present, the definite presence of the Roman Road and its extent cannot be proved and this potential will require further assessment, most likely via geophysical survey in the first instance. However, any below-ground remains of the Roman Road, if present within the Site, are considered to be of significance commensurate with a non-designated heritage asset. Under paragraph 135 of the NPPF remains of this type do not preclude development, but harm to these assets should be taken into account.

Built Heritage:

None of the buildings within the Site is considered to be of architectural or historic interest, and there are no heritage assets that would be a constraint to development.

No substantial constraints to development are expected as a result of changes to the setting of designated heritage assets within the vicinity of the Site.

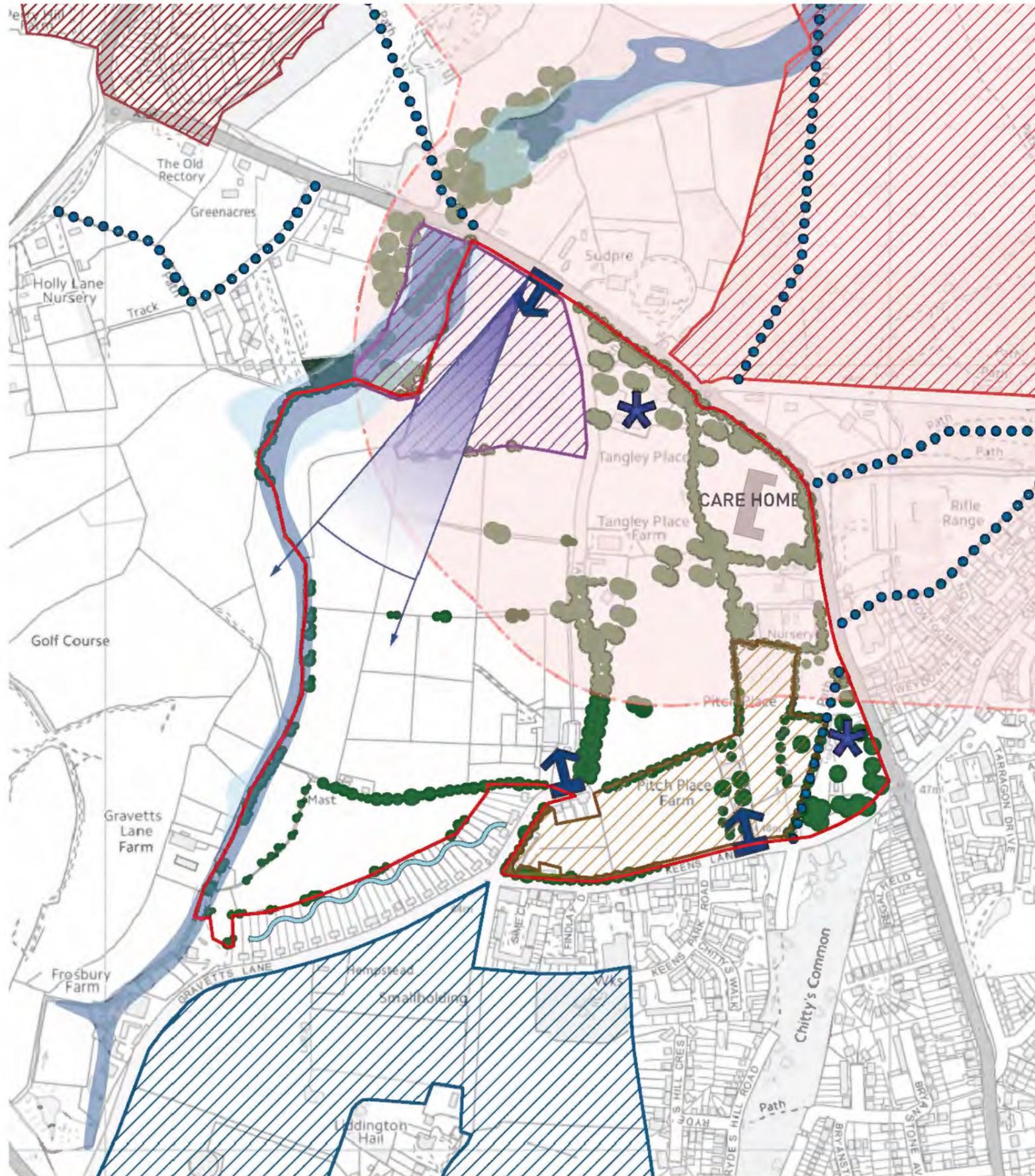
It is recommended, however, that the retention of an element of open space is considered within the northeast corner of the Site and along the eastern boundary within the vicinity of Tangley Place Farm. This would show something of the historic open nature of the Site within the agricultural landscape associated with Tangley Place Farm (a non-designated heritage asset). Open space would also provide a degree of separation between new built form and the designated heritage assets of Tangley Cottage and The Old Bothy (Grade II Listed).ⁱ



KEY

- Site
- ▲ Grade I Listed Building
- ▲ Grade II* Listed Building
- ▲ Grade II Listed Building
- Worplesdon Conservation Area

DESIGNATED HERITAGE ASSETS



CONSTRAINTS & OPPORTUNITIES PLAN

-  SITE BOUNDARY
-  SITE 61
-  SITE 62
-  WORPLESDON CONSERVATION AREA
-  SITE 102
-  WHITMOOR COMMON SPA & SSSI
-  LISTED BUILDING
-  FLOOD ZONE 3
-  FLOOD ZONE 2
-  400 METRE SPA BUFFER ZONE
-  EXISTING VEGETATION
-  KEY VIEW IMPORTANT IN RETAINING 'OPENESS'
-  SENSITIVE RESIDENTIAL BOUNDARY
-  POTENTIAL VEHICULAR ACCESS POINTS (SUBJECT TO HIGHWAY INPUT)
-  INDICATIVE LOCATION OF EXISTING TREES (SUBJECT TO SURVEY)
-  ANCIENT WOODLAND

Opportunities

- The site sits in a wide, shallow valley which rises from c. + 40m AOD within the site) to c. + 60m at Worplesdon. This increases the potential physical and visual containment of the site;
- Proximity of the site to arterial highway routes (including the A322 and A323) provides opportunities for road access which will avoid impacts on other local roads that are more rural in their character;
- Working within the framework of existing green infrastructure on the site will guide the development layout in ways that respond to local landscape character;
- Provision of new green infrastructure links across the site will enhance connectivity in terms of both access and biodiversity, including links between larger areas of designated Common Land to the north and south;
- The SPA/SSSI buffer zone and designated Common Land both within and directly adjacent to the site, provides opportunities to focus the landscape strategy for green infrastructure and open spaces around these established areas and promote connections and links for access and biodiversity;
- Utilising the existing physical landscape feature of the nearby watercourse (and associated linear tree belts) will retain and enhance a strong green infrastructure framework on the western edge of the site which will physically and visually contain the site and also represent a clear, permanent and defensible boundary to the Green Belt;
- Ancient woodland located on the outside edge, adjacent to the boundary of the site, provides opportunities to protect and enhance this landscape feature through additional planting and green infrastructure connections; and
- Referencing existing views and view corridors to the distant AONB (Surrey Hills to the south) will guide the extent and layout of the development envelope within the site.

Constraints

- Part of the site sits at a localised topographical high point, rising from c. +36m at Worplesdon Road to c. +50m AOD at Keens Lane and Gravetts Lane. In the immediate context, the site sits above a shallow valley formed by the nearby watercourse;
- The existing nearby watercourse which forms a delineating physical landscape feature through the area between Guildford and Fairlands (and also Worplesdon);
- The presence of hedgerows, hedgerow trees and small woodland copses/belts which form the existing green infrastructure framework on the site;
- The presence of a public bridleway to the south-east corner of the site (currently linking Keens Lane and Worplesdon Road);
- Some areas of designated Common Land on and directly adjacent to the site;
- The rural character of some local roads, including Tangle Lane;
- Potential issues of coalescence between the north-western edge of Guildford and the nearby settlements of Worplesdon and Fairlands;
- Some available long distance views to the Surrey Hills AONB from the site and adjacent roads (i.e. views looking south to the rising scarp and ridgeline);
- Proximity of the south-eastern edge of Worplesdon Conservation Area to the northwest of the site and also two Listed Buildings (Tangle Cottage and Pitch Place House) on the site; and
- The presence of the 400m buffer to the SPA/SSSI designations which precludes built development in this area.
- The presence of the site within designated Green Belt;
- The presence of two listed buildings within the site's boundaries, towards the periphery of the site;
- The need to respect the residential amenity of existing residents on Gravetts Lane through consideration of proposed orientation and siting of buildings.

SECTION 6 DEVELOPMENT PRINCIPLES

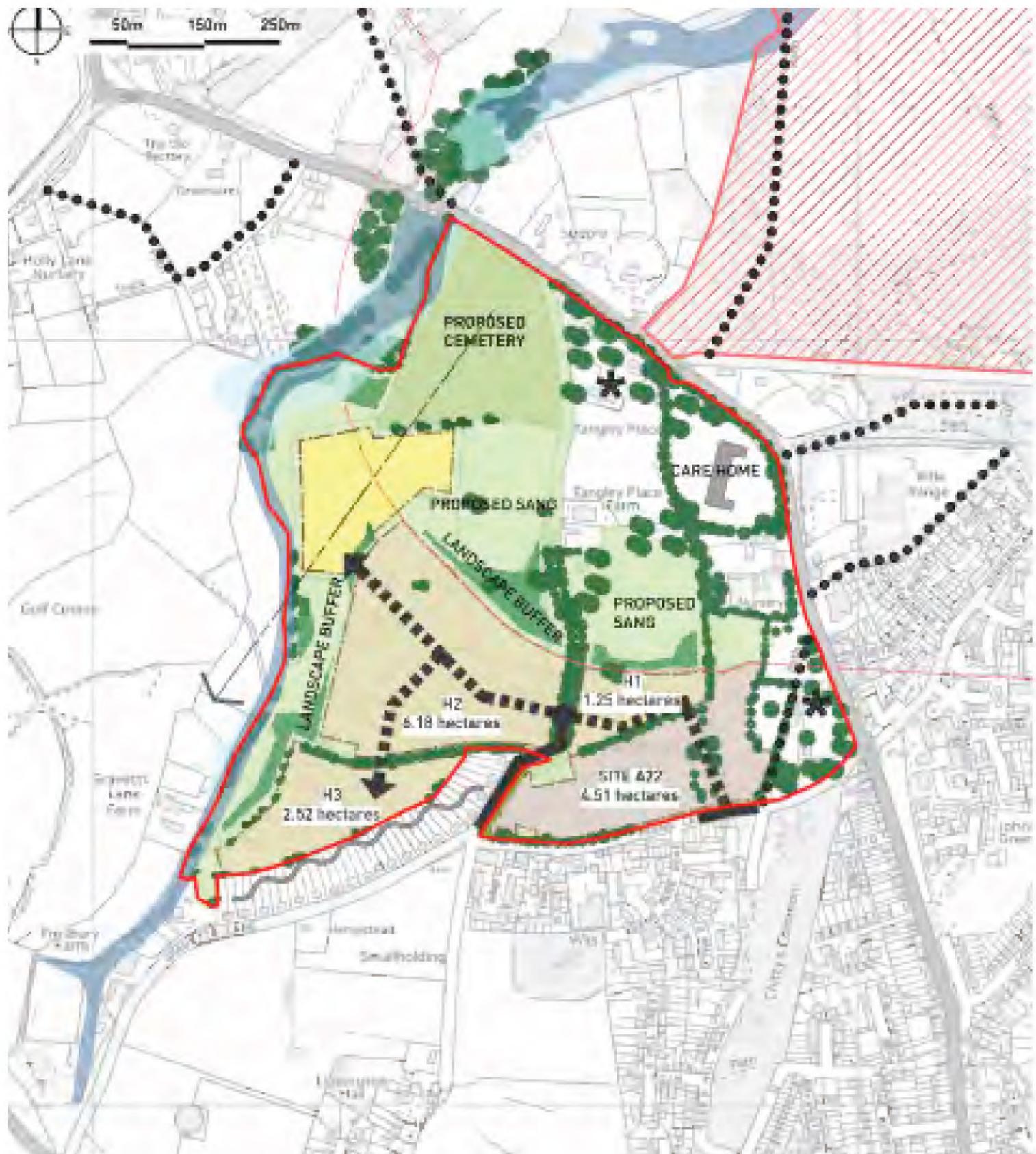
DEVELOPMENT PROPOSALS

The development proposals for Tangley Place are associated with the modification of Green Belt boundaries over a wider area than Tangley Place Farm, including:

- The proposed housing allocation north of Keen's Lane;
- Land east of Tangley Lane (up to the built-up area);
- Land west of Tangley Lane as far as the brook (which will serve as the new inner boundary of the Green Belt) including land north of Gravetts Lane and south of Worplesdon Road; and
- The site at Liddington Hall which was proposed in the Local Plan Issues and Options and is being promoted for residential development by the Guildford Colleges who own the site. This site, as originally proposed in the Local Plan, forms part of a wider modification of the inner boundary of the Green Belt north west of the Guildford urban area.

The Framework Plan in this Concept Statement develops and updates proposals that were presented in a previous submission on the Local Plan Regulation 19 Consultation of June/July 2017:

- It confirms the boundaries of the site and the developable area;
- It confirms the location of a road access from Tangley Lane and pedestrian links;
- Land previously shown as a potential school site is now identified for surface water storage to regulate run-off into the brook;
- The proposed cemetery has been deleted as the Council is still proposing an alternative site next to Whitmoor Common (although that has implications for the SPA that would not apply to land west of Tangley Lane and south of Worplesdon Road);
- The 400m SPA buffer zone is a major constraint on site layout, but can accommodate SANG and other open space uses such as surface water storage, to complement the developable area.



DEVELOPMENT FRAMEWORK PLAN

KEY	
	SITE BOUNDARY AS SQHA
	PROPOSED RESIDENTIAL
	HOUSING ALLOCATION SITES H1 & H2
	POTENTIAL VEHICULAR ACCESS (SUBJECT TO HIGHWAY INPUT)
	FLOOD ZONE 1
	FLOOD ZONE 2
	400 METRE SPA BUFFER ZONE
	POTENTIAL FOR OPEN SPACE/ EDUCATION COMM
	OPEN SPACE/SAND
	WHITMOOR COMMON SPA & SSSI
	LISTED BUILDING
	EXISTING PUBLIC RIGHT OF WAY
	PROPOSED CEMETERY
	KEY VIEW TO SURREY HILLS ROAD
	SENSITIVE RESIDENTIAL BOUNDARY
	INDICATIVE LOCATION OF EXISTING TREES SUBJECT TO SURVEY

NOT ALL FUTURE PROPOSALS SUBJECT TO SURVEY/REGULATION

The Wider Area

There exists significant potential for an extension to the existing proposed housing allocation north of Keens Lane in the southern portion of the site.

There also exists potential for residential development in the southern half of the western portion of the site which is less visually exposed and lies adjacent to existing residential development on Gravetts Lane.

Beyond the existing proposed allocation, it is considered there is reasoned justification (supported by landscape analysis) for somewhere in the region of 350 dwellings, which would be accessed from either Keens Lane, south of the site, or from Gravetts Lane at the centre of the site's southern boundary which currently provides access to the equestrian uses, positioned centrally within the site.

Housing in this location would lie beyond the 400m buffer zone for the Whitmoor Common SPA and SSSI and would avoid encroachment into the more visually exposed north western corner of the site.

The site also provides the opportunity for the provision of a sizeable area of open space which could form Suitable Accessible Natural Green Space (SANG).

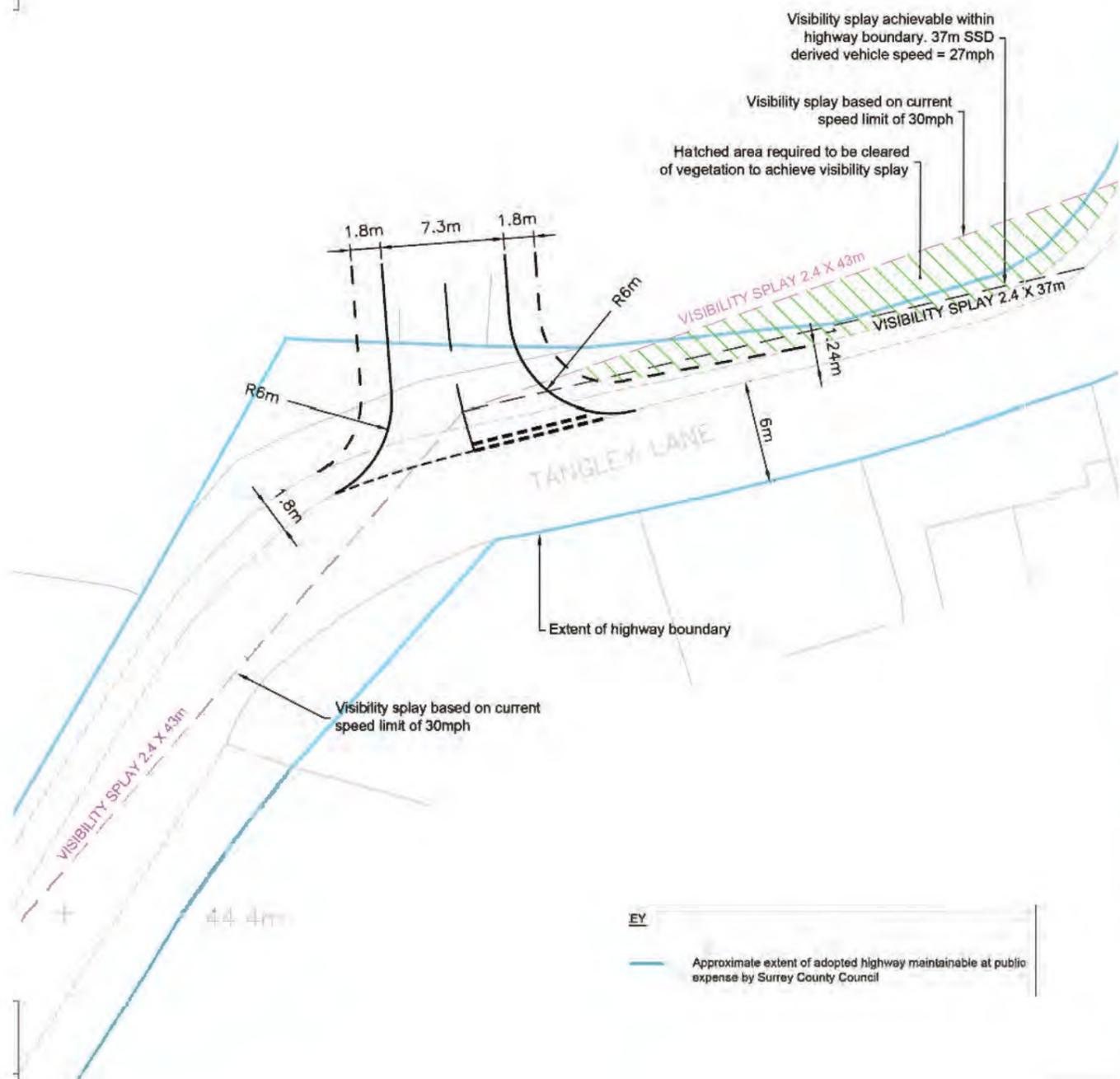
The laying out of open space in the northern portion of the site would allow connections between the proposed housing and the existing public rights of way and heathland north east of the site.

Within the development envelope and layout, consideration has been given to the existing vegetation (including trees, hedgerows, hedgerow trees and small copses and belts of woodland). These landscape elements have been retained (see right) as part of the preliminary landscape strategy and therefore can be integrated into the layout of a more detailed masterplan in the future. More detail on the landscape potential of the site is provided within the accompanying Landscape Report.

Site Access

Figure 3.0 in Section 3 above shows the preliminary access junction in the form of a priority T-junction to serve the site. The junction is located in the location of the existing farm access, providing a carriageway width of 5.5 metres and footways widths of 1.8 metres on either side to tie in with existing footway provision. The footway widths are consistent with the existing footway widths on Tangley Lane, but can be widened to two metres if ultimately required.

PRELIMINARY ACCESS JUNCTION





- KEY**
- Site boundary
 - Existing road infrastructure
 - Existing public utility
 - Existing school building
 - Existing pedestrian
 - Existing public open space
 - Existing recreational green infrastructure
 - Housing allocation sites
 - Proposed development sites
 - Potential for sports space/recreation/leisure/amenity
 - Potential leisure access point
 - Potential amenity access points
 - Proposed landscape structure
 - Potential green corridors
 - Potential landscape buffer planting
 - Potential locations for S&A/C
 - Potential locations for cemetery
 - Proposed Green Hub to A&M building

Landscape

Detailed design will include a high quality landscape scheme that incorporates private garden space and streetscape including street and garden trees. Over time these will contribute to the green infrastructure framework across the site, enhancing the character and integration of the site with the surrounding landscape. There may need to be some losses of vegetation, such as hedgerows, however these can be targeted to exploit existing breaks in vegetation and/or vegetation which is in poor condition.

Other specific changes in terms of landscape elements and features will be positive; including strategic landscape planting to augment the existing green infrastructure network and landscape planting associated with proposed open spaces (for example, but not limited to, landscape planting along the western corridor of the green infrastructure and buffer on the northern edge of development).

Drainage

The proposed drainage strategy is designed to reduce the rate of runoff from the area, encourage infiltration, improve runoff quality, create new habitats to encourage biodiversity, and provide improved amenity; representing the highest targets in the Sustainable Drainage (SUDS) hierarchy; and meeting national and local policies with regard to flood risk and drainage. The design will meet modern standards and reduce the rate of runoff from a 1 in 100 year event (with climate change allowance) to the greenfield run-off rate, thus reducing flood risk downstream.

The drainage strategy may include private drives formed in permeable paving, with roofs, roads and other paved areas gathered into a gravity drainage system and conveyed to a landscaped attenuation pond west of the development area, with a controlled outlet into the watercourse. Sustainable drainage features will be incorporated into the design, such as perimeter swales to convey runoff to the pond, along the north, south and western edges of the development. Ground with varied levels and planting also encourage infiltration and evapotranspiration, biodiversity and consequently reducing runoff.

Ecology

The more important habitat features such as hedgerows will be retained and enhanced. The landscape proposals will also provide opportunities for ecological enhancements such as wildflower areas, tree and hedgerow planting, and providing features for a range of faunal species such as bats and birds.

Heritage

None of the buildings within the Site is considered to be of architectural or historic interest, and there are no heritage assets that would be a constraint to development. No substantial constraints to development are expected as a result of changes to the setting of designated heritage assets within the vicinity of the Site.

However, it is recommended that an element of open space is retained within the northeast corner of the Site and along the eastern boundary to provide context for Tangley Place Farm (not designated) and a degree of separation between new development and the designated heritage assets of Tangley Cottage and The Old Bothy (Grade II Listed).

SECTION 7 SUMMARY & CONCLUSIONS

SUMMARY AND CONCLUSIONS

Opportunities

These proposals have the following advantages:

- They help to address the critical shortage of housing land supply that would result from the Council's proposals in the Submission Draft of the Local Plan, for the first five years and for most of the plan period;
- They are complementary to the Council's proposed allocation of Site A22;
- They create additional, public open space next to the urban area where accessible open space is in short supply;
- They provide SANG protection for effective mitigation within close proximity of impacts on the SPA of the proposed development of this site and the Council's proposed site allocation A22;
- They respect physical constraints including landscape assets, significant vegetation, water courses, important views, the SPA buffer, ecological considerations, and the setting of listed buildings;
- They maintain natural boundaries for the Green Belt, including the brook to the west with its associated vegetation; and
- They provide additional opportunities for housing on the urban edge of North West Guildford, within reach of facilities including schools, health services, public transport and local shops; and
- Development of the site can be delivered by Strategic Land Products within the early years of the plan period.

Modifications to the 2017 Local Plan

The Council says that it is currently consulting only on changes in the current draft of the Local Plan, compared with the previous Regulation 19 Consultation of June 2016. This report responds to those changes and to new evidence, to elaborate and refine the responses made by SLP to previous consultations.

To make sense of the latest proposed changes and to comment on the overall soundness of the plan, it is also necessary to refer to elements of the plan that have not changed since the previous consultation. It will also help the Planning Inspector who is examining the plan to have one coherent set of representations, rather than having to refer to both the current representations and representations on previous consultations which may now be wholly or partly superseded.

SLP objects to the Spatial Vision and Policy S2 – The Spatial Development Strategy (with the Council's proposed changes); including the annual housing targets in Policy S2 and the justification for the strategy in paragraphs 4.1.9a to 4.1.11. The approach to housing provision does not comply with the requirements of the National Planning Policy Framework (NPPF) as it does not seek to meet objectively-assessed housing requirements throughout the plan period.

An alternative local plan strategy is required that relaxes the constraints of Green Belt policy in sustainable locations on the edges of the built-up area of Guildford to meet housing needs, especially in the early years of the plan when implementation of some of Council's strategic allocations is impeded by the timescales for delivery of necessary infrastructure. Modifications of the Green Belt are required, in particular, to remove land west of Stoughton in the parish of Worplesdon, including land at Tangley Place Farm, together with land north of Keens Lane (Proposed Allocation Site A22) and land at Liddington Hall.

For these reasons, SLP also objects to Policy P2, Green Belt (with the Council's proposed changes), as continuing to maintain the Green Belt, as shown on the Policies Map, will prevent the delivery of housing that is required to meet objectively-assessed housing needs throughout the plan period. The Council has not reviewed Green Belt boundaries to 'take account of the need to promote sustainable patterns of development' as required by paragraph 84 of the NPPF or defined boundaries in accordance with the requirements of paragraph 85 of the NPPF.

SLP concludes that the Plan is not positively prepared. It lacks justification and is not effective or consistent with national policy. It therefore fails all the tests of 'soundness' in paragraph 182 of the NPPF. These conclusions are the basis for duly-made representations that are being submitted separately, in accordance with Regulation 20 of The Town and Country Planning (Local Planning) (England) Regulations 2012.



SUSTAINABLE LAND

Sustainable Land | 4b Market House | 19-21 Market Place | Wokingham | Berkshire | RG40 1AP

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