

Guildford Green Belt Assessment (GBA) – FAQs

1. Why have we produced the GBA?

The GBA responds to changes in national planning policy introduced in the updated National Planning Policy Framework (NPPF) 2024. The Government expects councils to carry out these assessments and has provided funding to do so.

2. Who has produced it?

An external consultancy, AECOM, has prepared this study. They are one of the leading consultants undertaking this type of work and have done similar studies for a number of other councils.

3. What is the main purpose of the GBA?

The main purpose of the GBA is to identify 'grey belt' land. The GBA forms part of the evidence base for the emerging new Guildford Local Plan.

4. What is grey belt?

Grey belt is Green Belt land that does not strongly contribute to any of the following three Green Belt purposes as set out in NPPF paragraph 143. These are:

- Purpose a: to check the unrestricted sprawl of large built-up areas;
- Purpose b: to prevent neighbouring towns merging into one another; and
- Purpose d: to preserve the setting and special character of historic towns.

It excludes land in certain areas where national planning policy (called NPPF 'footnote 7' constraints) provides a strong reason for refusing or restricting development (e.g. Sites of Special Scientific Interest or areas at high risk of flooding). See Q13 for more information.

Green Belt is a very restrictive designation, and development is generally considered to be 'inappropriate' unless it meets one of the NPPF's exceptions (see NPPF paragraph 154). Grey belt is an additional exception introduced by Government which creates a new category of land within the Green Belt that can be suitable for development if certain criteria are met. See Q18 for more detail about what this means.

5. Can grey belt include greenfield land?

Yes it can. The definition in the NPPF states that grey belt land is previously developed land and/or any other land. It is therefore not restricted to previously developed land or land that is of low value e.g. scrubland. It can include greenfield land of high landscape quality.

6. How has the methodology been developed?

AECOM have applied the methodology set out in Government's National Planning Practice Guidance (PPG). This provides very detailed guidance regarding how to undertake Green Belt Assessments – particularly in terms of how one scores the contribution to the specific Green Belt purposes. The guidance is available to view here: www.gov.uk/guidance/green-belt#assessing-green-belt-to-identify-grey-belt-land

7. How did AECOM split the borough for the purposes of undertaking the assessment?

The borough was split into 575 assessment areas (AAs). These areas follow readily recognisable features (such as roads, watercourses, etc). The PPG states that these need to be small and sufficiently granular in certain places such as around existing settlements or public transport hubs and corridors. The AAs are larger within the more rural parts of the borough.

8. How were the AAs assessed against the three Green Belt purposes?

The first step is to understand which purposes are relevant to which area(s). Each purpose refers to a different classification of settlement – ‘large built-up areas’, ‘towns’ and ‘historic towns’. AECOM used a combination of our Settlement Hierarchy study, Office for National Statistics classifications which are based on population size, engagement with neighbouring councils where the settlements are outside of our borough and professional judgement to define which settlements should be applicable for each classification. This methodology accords with industry best practice. For a more detailed explanation please see Section 2.3 of the GBA Report. The PPG clearly states that none of the Green Belt purposes relate to ‘villages’. Our Local Plan: Strategy and Sites 2019 defines all the villages in our borough. The outcome of this exercise is summarised below:

Guildford Borough Council	Neighbouring authorities
Large <u>Built up</u> Areas (also considered towns for the purposes of Green Belt Assessment) – Purpose A&B	
Guildford	Woking (including West Byfleet)
Ash & Tongham (as part of the Blackwater Valley urban area)	
Towns (in addition to the above) – Purpose B	
	Cobham/Oxshott
	Bookham/Fetcham
	Godalming/Farncombe
Historic Towns – Purpose D	
Guildford	Old Woking
	Godalming

9. How was the contribution to each purpose assessed?

The PPG provides very detailed guidance about how one assesses whether the contribution to each Green Belt purpose is strong, moderate or weak/none. AECOM have further separated out weak and none.

10. How did AECOM assess the land?

The assessment was undertaken using a mixture of desk-based GIS analysis, aerial photography and site visits.

11. Does an AA need to perform strongly against all three purposes to be identified as not grey belt?

No. An AA only needs to contribute strongly to one of the three purposes for it to not be grey belt.

12. If an AA does not strongly contribute to any one of the three purposes, is it automatically grey belt?

No. The NPPF 2024 also indicates that we need to consider footnote 7 constraints before determining whether it can be considered grey belt.

13. What are the relevant footnote 7 constraints that are applicable within the borough?
These are:

- habitats sites (Thames Basin Heaths Special Protection Area (SPA)) and/or designated as Sites of Special Scientific Interest;
- Local Green Space;
- Surrey Hills National Landscape;
- irreplaceable habitats (Ancient Woodland, lowland fen and ancient trees);
- designated heritage assets; and
- areas at risk of flooding.

14. Does this mean that all land that falls within one of these designations is not grey belt?

No. It is only not grey belt if the designation provides a strong reason for refusing or restricting development. For some of the constraints this is clear-cut and a definitive conclusion can be reached in the GBA. For example, land within the SPA is not suitable for residential development and any proposal would be refused on SPA grounds – in these cases, the GBA identifies that this type of land is not grey belt. For some constraints it is less clear-cut and a definitive conclusion can only be reached once there is a proposal to assess it against. For example, a site adjacent to and/or in the setting of a heritage asset. It is only once the scale, form and design of the proposed development is known that one could reach a conclusion on whether the heritage designation provides a strong reason for refusal. The GBA identifies this type of land as 'provisionally grey belt'.

15. Where can I see the assessment of each AA?

There is a map showing the reference number for each AA at Appendix E of the GBA. There is also an interactive map on our website. This reference number can then be used to locate the detailed proforma for each AA in Appendix B. Each proforma includes the detailed analysis against Green Belt purposes and Footnote 7 constraints. It also identifies whether the AA is considered to be grey belt, not grey belt or provisionally grey belt.

16. Is the grey belt definition expected to change?

Yes. A new version of the NPPF was consulted upon earlier this year. This proposed to remove the Footnote 7 constraint element of the definition. This change has yet to be confirmed. We expect the final version of the NPPF to be published in the Autumn.

17. What will happen if the definition changes?

If the definition is amended as proposed in the consultation version of the NPPF the GBA will be re-issued without the Footnote 7 component. This would mean there would no longer be a 'provisionally grey belt' category and all Green Belt would either be grey belt or not grey belt.

18. Does that mean that all land that is 'grey belt' can now be developed?

No, even if land is grey belt, it may not be suitable for development due to a range of other considerations. It may not even fulfil the exception in the NPPF, which would mean it is not suitable for development in Green Belt terms. Being grey belt is just one of a number of criteria that a site needs to meet in order to be considered

appropriate for development in the Green Belt. The other criteria are that there is a proven need for that type of development, it is in a sustainable location, and it meets the 'golden rules' (see NPPF paragraph 155). The current lack of a five-year housing land supply means that there is a proven need for housing. One of the golden rules is that the sites provide 50% rather than the usual 40% affordable housing.

19. How will the GBA be used to help inform the new Guildford Local Plan?

The GBA does not make any decisions on what land will be allocated for development in the Local Plan. National policy states that Local Plans are expected to meet the identified need in full. This may include the consideration of Green Belt land if all other suitable opportunities for growth have been explored first - namely the redevelopment of previously developed land, optimisation of density on sites and the use of non-Green Belt land. If there is still unmet need then the NPPF states that this can constitute the exceptional circumstances necessary to justify altering Green Belt boundaries. When altering Green Belt boundaries plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations. However, this must be in the context of promoting a sustainable pattern of development. For this reason, it may in some instances be preferable to allocate non grey belt land over grey belt land.

20. How will the GBA be used to determine planning applications?

Identifying land as grey belt does not grant planning permission. The GBA is an evidence base document and will be a starting point only for decision taking regarding sites that may be grey belt. The decision maker (planning officers, planning committee or a planning inspector) will still need to consider the site-specific circumstances and make their own assessment regarding whether the site is grey belt or not. For instance, the application site may only comprise part of an AA and therefore the conclusions reached may differ from the GBA. Furthermore, the GBA assesses each AA in isolation and is only a snapshot in time. If an adjacent site gets developed in the future this may have implications for the assessment of sites surrounding it.

21. Will there be further work undertaken on the GBA?

Yes. Once we have developed a preferred spatial strategy for the new Local Plan (a framework for where growth will be located) and a set of draft site allocations, and if it is determined that there are exceptional circumstances which justify alteration to Green Belt boundaries, AECOM will undertake a further assessment to understand the wider cumulative impact of proposed changes on the remaining Green Belt. The NPPF states that we should not alter boundaries if doing so would 'fundamentally undermine the purposes (taken together) of the remaining Green Belt when considered across the area of the plan'.

This assessment will include consideration of the other two Green Belt purposes:

- Purpose c: to assist in safeguarding the countryside from encroachment;
- Purpose e: to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The GBA includes a summary map of how land performs against purpose c however this detailed assessment was not undertaken by AECOM. Instead, this simply repeats the findings of the previous Green Belt and Countryside Study. In relation to purpose e – all Green Belt land is considered to contribute to this purpose equally.

Neither of these purpose assessments are relevant to the identification of grey belt however they are relevant to the wider impact assessment.