

Land at Shortland Farm Planning Statement

Gleeson Strategic Land

31 October 2025

Lichfields is the pre-eminent planning and development consultancy in the UK

**We've been helping create great places
for over 60 years.**

lichfields.uk

Contents

1.0	Introduction	1
	Planning Benefits	1
	Application scope and structure	2
	Plans submitted for approval	2
	Plans submitted for information or for indicative purposes	3
2.0	Site Description	5
	Site location and surrounding area	5
	Planning Designations	5
	Planning History	6
3.0	The Planning Application Proposal	7
	Pre-application engagement and discussions	7
	The Proposals	7
4.0	Planning Policy Context	10
	National Planning Policy	10
	Planning Practice Guidance	12
	Other Material Considerations	17
5.0	Planning Assessment	18
	A) Principle of development	18
	Grey belt Summary	26
	B) Housing	27
	C) Design and Layout	29
	D) Open space and play space	29
	E) Landscape impact and green infrastructure	29
	Outline Landscape Masterplan	31
	F) Trees, ecology and biodiversity	32
	G) Flood risk and sustainable drainage	35
	H) Transport and parking	37
	I) Heritage and archaeology	40

	J) Noise	41
	K) Air quality	42
	L) Ground conditions	43
	M) Energy and sustainability	43
	N) Agricultural Land Classification	45
6.0	Planning Contributions	46
7.0	Planning Balance	47
	Grey belt – Appropriate Development	47
	Green belt – Inappropriate Development	48
8.0	Conclusions	50

Appendices

Appendix 1 Economic Benefits Infographic for Land at Shortland Farm

Appendix 2 Planning History

1.0 Introduction

- 1.1 This Planning Statement is prepared by Lichfields on behalf of Gleeson Land in relation to the submission of an outline planning application (hereafter “the Application”) for residential development at Land at Shortland Farm, Guildford Road, Ash, Guildford (hereafter “the Site”) within the administrative boundary of Guildford Borough Council (hereafter “GBC”). The Site is located within the green belt.
- 1.2 The proposed description of development is as follows:
- Outline planning application with all matters except for the accesses from Guildford Road and Wyke Lane reserved for subsequent approval for the demolition of the existing buildings and hardstanding and the erection of:*
- *up to 200 residential dwellings including affordable housing and plots of self-build plots (Class C3);*
 - *green and blue infrastructure; and*
 - *associated service and utility structures.*
- 1.3 All matters are reserved except for access, for which full details are provided as part of the Application. The Application is submitted with Parameter Plans. A Design & Access Statement has been prepared, which explains the design evolution and demonstrates how the Site can be developed in accordance with the Parameter Plans.
- 1.4 The purpose of this Statement is to assess the proposed development against policies in the statutory development plan and other material considerations, including relevant national planning policies.
- 1.5 The Proposed Development includes:
- 1 Up to 200 dwellings, comprising a mix of apartments, terraced, semi-detached and detached homes of 1, 2, 3 and 4 bedrooms;
 - 2 50% affordable housing;
 - 3 A primary vehicular access point from Guildford Road and an emergency vehicular access point from Wyke Lane;
 - 4 Retention and enhancement of the onsite PROW;
 - 5 A viewing corridor towards the Surrey Hill National Landscape;
 - 6 New green corridors for biodiversity enhancement and informal recreation including on site Biodiversity Net Gain (BNG) for hedgerows and watercourses;
 - 7 Public open green spaces with appropriate play facilities; and
 - 8 Sustainable drainage system (SuDS) throughout.

Planning Benefits

- 1.6 The Application will deliver a range of substantive planning benefits (including those identified in the Economic Benefits Infographic at Appendix 1) including:

- The proposed homes will make a vital contribution towards meeting local housing need. This is a significant benefit in light of the significant housing deficit which is likely at least c.2,500 homes across Guildford in the next five years¹.
- 50% of the residential dwellings will be affordable and will address the GBC's significant identified need for affordable homes.
- Significant economic benefits, including over 120 construction jobs, forecasted £1.3m uplift in yearly local expenditure, and an uplift of £570,000 in council tax revenues.
- Utilising the onsite PROW (and providing surface improvements) to create an exceptionally well connected and sustainable new development which can reach the train station on foot in 8 minutes or cycle in only 3 minutes.
- Improvements to the pedestrian network, public transport infrastructure (including improvements to facilities at nearby bus stops), to encourage sustainable travel.
- Enhancements to both the Guildford Road / Wyke Lane and Guildford Road / Harpers Road junctions in the form of pedestrian facilities, dropped kerbs and tactile paving. Delivery of a new access junction providing vehicular and pedestrian facilities.
- A significant net gain in canopy cover across the Site enhancing its capacity to provide ecosystem services.
- Introducing public views towards the Surrey Hill National Landscape. This includes improved opportunities for the public to view and appreciate retained trees from a wider range of locations and perspectives, contributing positively to the public amenity value of the Site.
- Addressing other policy led benefits including the "Golden Rules" at paragraph 158 of the NPPF.
- Biodiversity Net Gain.

Application scope and structure

- 1.7 A suite of application reports and plans have been submitted to accompany the Application.
- 1.8 The Application includes some plans / documents that are submitted 'for approval', whilst others provide background, illustrative and accompanying information (see below). These are submitted to assist GBC in determining the planning application.
- 1.9 The Planning Statement addresses both site-specific and technical issues that are relevant to the determination of this planning application. In doing so, it draws from the analysis and conclusions of a range of technical documents which accompany the Application.
- 1.10 It should be read in conjunction with the following plans and technical documents that accompany the Application. Plans which are submitted for approval are marked as such.

Plans submitted for approval

- Site Location Plan (ref. 25019 – S101B)

¹ See paragraph 5.36 of this Planning Statement, over a five-year period and applying a 5% buffer GBC need to deliver 6,132 dwellings, compared with identified supply of 3,552 dwellings, the shortfall is significant at -2,580 dwellings and a 2.9 year supply

Parameters Plans:

- Land Use Parameter Plan (ref. 25019 – C102)
- Heights Parameter Plan (ref. 25019 – C103)
- Green Infrastructure Parameter Plan (ref. 25019 – C104)

Access drawings:

- Primary Access (ref. MJGWYKELANE 1/01 Rev P4)
- Emergency Access (ref. P4MJGWYKELANE 1/06 Rev P2)

Plans submitted for information or for indicative purposes

- Existing Buildings Sheet 1 (ref. 25019 – S110)
- Existing Buildings Sheet 2 (ref. 25019 – S111)
- Existing Buildings Sheet 3 (ref. 25019 – S112)
- Existing Floor and Site Levels (ref. 25019 – S102A)
- Illustrative Masterplan (ref. 25019 – C101A)
- Illustrative Landscape Strategy (prepared by Cornus)

Documents

- 1 Cover letter
- 2 Completed application form and relevant planning fee (submitted through the Planning Portal)
- 3 Ownership Certificates (submitted through the Planning Portal)
- 4 Design & Access Statement (including Accessible Homes statement, Minimum internal space standard statement and Open/amenity space assessment) (prepared by OSP Architecture)
- 5 Planning Statement (prepared by Lichfields)
- 6 Landscape and Visual Impact Assessment (prepared by Leyton Place)
- 7 Green Belt Technical note (prepared by Leyton Place)
- 8 Topography Survey (prepared by MK Surveys)
- 9 Ecological Impact Assessment & SANG Statement (prepared by FPCR), including BNG report (Appendix G)
- 10 Completed Biodiversity Statutory Metric (prepared by FPCR)
- 11 Heritage Impact Assessment (prepared by Lichfields)
- 12 Desk-based Archaeology Assessment (prepared by Lichfields)
- 13 Flood Risk Assessment (prepared by Aegaea)
- 14 Drainage Strategy (prepared by Aegaea)

- 15 Utilities Statement (prepared by TDS)
- 16 Transport Assessment (including Parking provision statement and Site waste management plan) (prepared by Mayer Brown)
- 17 Outline Travel Plan (prepared by Mayer Brown)
- 18 Arboricultural Impact Assessment and Tree Survey (prepared by Aspect)
- 19 Contaminated Land Report (prepared by RSK)
- 20 Noise Assessment (prepared by Cass Allen)
- 21 Air Quality Assessment (prepared by Cass Allen)
- 22 Statement of Community Involvement (prepared by Lichfields)
- 23 Energy and Sustainability Statement (prepared by Daedalus)
- 24 Lighting Statement (prepared by Tetrattech)

Structure of the Statement

- 1.11 The remainder of the Planning Statement includes the following sections:
- Section 2.0 describes the Application Site, its surroundings and relevant planning history;
 - Section 3.0 describes the Application in detail including information about the development parameters;
 - Section 4.0 sets out the planning policy context against which the Application should be considered;
 - Sections 5.0 –assesses the planning application against the identified planning policy context, based on the key planning themes and issues;
 - Section 6.0 outlines the approach to planning obligations;
 - Section 7.0 sets out our assessment of the planning balance; and
 - Section 8.0 contains the conclusions.

2.0 Site Description

Site location and surrounding area

- 2.1 The Site amounts to circa 10.24ha and lies to the east of the village of Ash. Specifically, the Site lies to the immediate south of Guildford Road (A323) and to the immediate west of Wyke Lane. The Site contains some previously developed land with farm buildings and hardstanding which is centrally located.
- 2.2 The greenfield element is divided into a number of field parcels, lined with hedgerows of varying thickness and some mature trees. The northern boundary of the Site is also lined by some mature trees and post-and-wire fencing. There is a single-track internal road that leads to the Shortland Farm buildings from Guildford Road in the north, the track is lined by low wooden post fencing. There is also a small watercourse that runs outside the Site, adjacent to the western half of the southern boundary.
- 2.3 There is a Public Right of Way ('PROW') (Ref. FP 356) that crosses the Site in a south-west to north-east direction between the farm buildings and Guildford Road. The PROW is lined by a strip of mature trees/hedgerows along the entirety of its route through the Site.
- 2.4 In terms of topography, the Site is relatively flat at approximately 75m above ordnance datum (AOD) to 85m AOD across the Site.
- 2.5 To the north of Guildford Road are residential and commercial properties. To the east, the Site is bound by Wyke Lane (a wide lane with a pavement and two-way junction onto Guildford Road), beyond which lies residential dwellings. To the south, the Site is bound by greenfield agricultural land, beyond which lies Harper's Road. To the north-west are five residential properties (nos. 130-138 Guildford Road), beyond which lies 'Harpers Recreational Ground' and 'Ash Playground'. Directly to the west are residential dwellings along Harper's Road and 'Totterdown Preschool' Childcare and Nursery.
- 2.6 Access to the Site is taken from Guildford Road (A323) to the north. The Site is located approximately 700m to the east of Ash railway station.

Planning Designations

- 2.7 The Site is located within the green belt. The green belt boundary for this part of Ash aligns with Harper's Road, which is very close to the western edge of the Site.
- 2.8 The nearest statutory ecological designations (approximately 300 metres to the north) are the 'Thames Basin Heaths' Special Protection Area ('TBHSPA'); the 'Thursley, Ash, Pirbright & Chobham' Special Area of Conservation ('SAC'); and the 'Ash to Brookwood Heaths' Site of Special Scientific Interest ('SSSI'). A small part of the northernmost part of the Site sits within the 0 to 400m 'exclusion zone' from development within the TBHSPA, SAC and SSSI and the remainder of the Site sits wholly within 400m to 5km 'zone of influence'. The Site is also in the Impact Risk Zone ('IRZ') of the Ash to Brookwood Heaths SSSI.
- 2.9 The Site sits in a corridor between two Biodiversity Opportunity Areas (BOAs). To the north is the Thames Basin Lowlands BOA, and to the South is the North Downs BOA.

- 2.10 The nearest recorded historical designation is 'York House' (list entry no. 1029635), a Grade II Listed building located approximately 40m to the west of the Site and 'East Wyke Farm' (list entry no. 137711), a Grade II Listed building located approximately 180m to the south of the Site. There is also a 'Locally Listed Building' ('The Lion Brewery Public House'), located at the corner of Harper's Lane and Guildford Road, approximately 150m to the west of the Site.
- 2.11 The Site contains a number of trees covered by the Tree Preservation Order (TPO) ref: 2017/8. The order covers a number of trees on the Guildford Road frontage, a line of trees running on the north-east boundary along Wykes Lane and a further line of trees running either side of the PROW.
- 2.12 According to GOV.UK's Flood Map for Planning Services, the Site is located entirely within Flood Zone 1 (land with a low probability of flooding). The planning application is accompanied by a Flood Risk Assessment ('FRA') prepared by Aegaea.
- 2.13 According to Natural England's Provisional Agricultural Land Classification ('ALC') Map, the majority of the Site is located in the 'Urban' category and the southern area of the Site is located within Grade 4 (Poor) ALC.

Planning History

- 2.14 GBC's online planning register identified a number of applications in relation to the Application site. We set out below a summary of the most relevant planning application determined on the Site with Appendix 2 setting out a detailed list of applications in relation to the Site (as identified on the online planning register).
- Application reference: 17/P/00507 - Outline permission for a residential development consisting of 300 units (105 affordable) with all matters reserved. Refused 08 Sep 2017.
- 2.15 This application was refused for reasons associated with inappropriate development in the green belt, potential significant effects on the Ash to Brookwood Heaths Site of Special Scientific Interest and Thames Basin Heaths Special Protection Area, vehicular access, sustainable travel, impact on the highway network, unplanned sprawl, trees and landscaping, less than substantial harm to heritage assets, residential amenity and absence of a completed planning obligation.
- 2.16 This Planning Statement establishes how the Application has addressed previous reasons for refusal and sets out the different national planning policy context within which this planning application will be determined.

3.0 The Planning Application Proposal

Pre-application engagement and discussions

- 3.1 The accompanying Statement of Community Involvement (SCI) submitted as part of the Application sets out a summary of the engagement undertaken with relevant consultees, the local community, and ward and parish councillors before submitting this application.
- 3.2 A request for pre-application advice was submitted to GBC on the 7 July 2025. Confirmation of receipt of the pre-application request and the appropriate fee came on the 11 July 2025. On the 9 October 2025 contact was made about pre-application discussions. Due to the significant passage of time since the request was made and this contact being made so close to submission, it was requested on the 13 October 2025 that the advice sought now turns into post-submission advice in the form of a Planning Performance Agreement. A response to this request had not been received at the time of submission.

EIA Screening

- 3.3 A request for GBC to provide a formal screening opinion pursuant to Regulation 6 of the Town and Country Planning (EIA) Regulations 2017 (as amended) to confirm whether there is requirement for an Environmental Impact Assessment ('EIA') in relation this development on the Site was submitted on 6 August 2025.
- 3.4 The opinion issued by GBC on 27 August 2025 (ref. 25/S/00002) confirmed the proposed development would not amount to EIA development.

The Proposals

- 3.5 Full details of the proposals are provided within the Design and Access Statement prepared by OSP Architecture.
- 3.6 The description of development for the Application is:
- Outline planning application with all matters except for the accesses from Guildford Road and Wyke Lane reserved for subsequent approval for the demolition of the existing buildings and hardstanding and the erection of:*
- *up to 200 residential dwellings including affordable housing and plots of self-build plots (Class C3);*
 - *green and blue infrastructure; and*
 - *associated service and utility structures.*

Parameter Plans

- 3.7 The Parameter Plans set the parameters for development within which future reserved matters applications will come forward, and which we anticipate will be subject to a planning condition as part of a planning permission. They cover:
- Land use and access;
 - Building heights; and

- Green infrastructure.

Land Use and Access

- 3.8 The Land Use and Access Parameter Plan has been prepared to set out the extent of the residential development 'zone' and the landscaped open space areas for the development. The areas shown indicate a development area of 5.23ha (51.1% of the Site, but this will also include roads, footpaths etc and not just homes) and open space areas amounting to 5.01ha (48.9% of the Site).
- 3.9 The primary vehicular access is shown from Guildford Road, as is the point at which it connects into the residential development area which makes use of the existing break in trees and hedgerows in the PROW to minimise any impacts to the route. The emergency access onto Wyke Lane is also indicated, this location utilises a location in a gap between trees on this eastern boundary.
- 3.10 The proposal can include a mixture of typologies, including apartments, terraced housing and detached homes. 50% of homes will be provided as affordable homes in a range of sizes to be agreed with the local authority, providing opportunities for first time buyers, key workers, and young families to get onto the property ladder. The quality and appearance of the affordable housing will be visually indistinguishable from the market. The proposals can also ensure that affordable housing is pepper potted throughout the new neighbourhood rather than being in one area.
- 3.11 The precise mix of units will be detailed within subsequent reserved matters submission(s).

Building Heights

- 3.12 The Building Heights Parament Plan has been prepared to define the maximum extent of the residential buildings within the development zone for a future reserved matters planning application. The proposed development is generally low-rise and at a density that reflects the nature and character of the location. Most of the residential development zone has a maximum of 2 storeys whereby the proposed housing typologies will comprise predominantly two-storey single-family houses in keeping with this character. Two parcels of three storey building areas are located centrally within the Site, these are likely to be small scale apartments blocks to fulfil the local housing needs and create focal points at key locations.

Green Infrastructure

- 3.13 The Green Infrastructure Parameter Plan defines the areas of public open space and the existing trees and hedgerows to be retained (where possible) as part of a future reserved matters planning application. The nature of the open space will be more precisely detailed at the reserved matters stage. However, the Illustrative Landscape Masterplan which accompanies this application provides an overall approach to the landscape strategy, demonstrating how the proposals can be accommodated into the receiving landscape to respond to local context and character.
- 3.14 Furthermore, the Green Infrastructure Parameter Plan incorporates the central corridor within the development for a viewing corridor towards the Surrey Hill National Landscape (the boundary of which is located c.2.5km south of the Site). Existing trees and hedgerows

are proposed to be retained where possible although there will be some loss required, for example as a result of providing the access points.

Illustrative Masterplan

- 3.15 An Illustrative Masterplan has been produced by OSP Architecture to accompany the Application (ref. 25019 – C101A). This demonstrates one way in which development could come forward through the reserved matters process, in compliance with the proposed Parameter Plans.

4.0 Planning Policy Context

- 4.1 This section sets out the planning policy and guidance relevant to the Application at the national and local level. It identifies the key planning considerations against which the planning application will be assessed in Sections 5.
- 4.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 (PCPA) states that *“if regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.”*
- 4.3 Further, section 66(1) of the Planning (Listed Buildings and Conservation Areas) 1990 Act (the 1990 Act) states that *“in the consideration of proposals for planning permission which affect a listed building or its setting, the local planning authority shall pay special regard to the desirability of preserving the building or its setting, or any features of special architectural or historic interest.”*

National Planning Policy

- 4.4 The National Planning Policy Framework (NPPF) (December 2024) sets out the government’s planning policies for England and how these are expected to be applied. In the context of Section 38(6) it is a material planning consideration in decision-making.
- 4.5 Much of the NPPF is relevant to the Application; its policies are not repeated in full in this Section but are referred to throughout this Statement.
- 4.6 It is noted clearly in the NPPF that *“the purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development and supporting infrastructure in a sustainable manner.”* (paragraph 7)
- 4.7 The aim of the NPPF is to proactively deliver sustainable development to support the Government’s housing and economic growth objectives and meet the needs of the country. Paragraph 8 sets out the three dimensions of sustainable development: ‘economic’ – to help build a strong, responsive and competitive economy; ‘social’ – to support strong, vibrant and healthy communities, and ensuring a sufficient number and range of homes to meet the needs of present and future generations; and ‘environmental’ – protecting and enhancing the natural, built and historic environment, including making effective use of land, improving biodiversity and adapting to climate change.
- 4.8 The NPPF requires Local Planning Authorities (LPAs) to adopt a positive and creative approach to decision taking and to apply a presumption in favour of sustainable development. Paragraph 11 goes on to note that for decision-taking, the application of a presumption in favour of sustainable development means:
- “c) approving development proposals that accord with an up-to-date development plan without delay; or*
- d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*

i. the application of policies in [the NPPF] that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in [the NPPF] taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination” (emphasis added)

- 4.9 Footnote 7 of the NPPF lists the areas or assets of particular importance. The Site is within the green belt, which is protected under Footnote 7, however, as set out in Section 5 the development is considered to be grey belt. We then expand on the application of the relevant policies in the NPPF that protect these areas or assets and if they provide a strong reason for refusing the development proposed.
- 4.10 Footnote 8 of the NPPF confirms that for applications involving the provision of housing, policies are considered ‘out-of-date’ in situations where the LPA cannot demonstrate a five-year supply of deliverable housing sites; or where the Housing Delivery Test (HDT) indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years. In these situations, this means that permission should be granted unless paragraph (d)(i) or (d)(ii) apply. The scale and nature of housing need in GBC is addressed in Section 5.0 (parts A and B) of this statement.
- 4.11 Paragraph 153 states that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the green belt, including harm to its openness. Inappropriate development is, by definition, harmful to the green belt and should not be approved except in very special circumstances. Such circumstances will not exist unless the potential harm to the green belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.
- 4.12 However, paragraph 155 states that the development of homes in the green belt should not be regarded as inappropriate including where the development would utilise grey belt land (as defined in Annex 2 of the NPPF) and would not fundamentally undermine the purposes of remaining green belt; there is a demonstrable unmet need for the type of proposed development; and where applicable, the proposed development meets the ‘Golden Rules’.
- 4.13 The Golden Rules are set out in paragraph 156, which states that where major development involving the provision of housing is proposed on land released from the green belt or on sites in the green belt subject to planning application, the following contributions should be made: affordable housing which reflects paragraph 67 as above (50%); necessary improvements to local or national infrastructure; and provision of new, or improvements to existing, publicly-accessible green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces.
- 4.14 Paragraph 67 states that as part of the ‘Golden Rules’ for green belt development, the affordable housing requirement for major residential developments on land which is proposed to be released from the green belt or which may be permitted on land within the green belt, should be set at a higher level than that would otherwise apply to land not within

these criteria and require at least 50% of the development to be affordable, unless making the development unviable.

- 4.15 Paragraph 158 iterates that a development compliant with the Golden Rules should be given significant weight in favour of the grant of permission.
- 4.16 Paragraph 15 states that plans should provide a positive vision for the future of each area and address housing needs and other economic, social and environmental priorities.
- 4.17 Paragraph 61 notes that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed. The overall aim should be to meet as much of an area's identified housing need as possible, including with an appropriate mix of housing types for the local community.
- 4.18 Paragraph 78 states that Local Planning Authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing.
- 4.19 Paragraph 126 states that LPAs and other decision-making bodies should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs.
- 4.20 Paragraph 135 states that decisions should ensure that developments are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; and optimise the potential of the Site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks.
- 4.21 Paragraph 172 states that all plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property. This should be done by applying the sequential test to ensure that development is not permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The interpretation and implementation of this policy, particularly in relation to sites at risk of surface water flooding, has been clarified by updates to the Planning Practice Guidance (PPG) on Flood Risk and Coastal Change in September 2025. These policy changes are explored in more detail in the next section.
- 4.22 Paragraph 215 notes that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

Planning Practice Guidance

- 4.23 Complementary to the NPPF, the PPG expands on some of the above NPPF policies, particularly in relation to green/grey belt and flood risk.

Green belt

- 4.24 Advice on the role of the green belt in the planning system was published on 27 February 2025. The guidance is relevant for authorities performing a review of green belt boundaries to meet housing or other development needs (either prior to or as part of the plan making process), those authorities otherwise required to determine whether land constitutes grey belt in decision making, and others seeking to identify grey belt land.
- 4.25 The PGG confirms that in order to assess the green belt in the relevant local or strategic development area effectively, authorities will need to:
- *“identify the location and appropriate scale of area/s to be assessed*
 - *evaluate the contribution each assessment area makes to Green Belt purposes (a), (b), and (d), using the criteria identified below*
 - *consider whether applying the policies relating to the areas or assets of particular importance in footnote 7 to the NPPF (other than Green Belt) would potentially provide a strong reason for refusing or restricting development of the assessment area*
 - *identify grey belt land*
 - *identify if the release or development of the assessment area/s would fundamentally undermine the five Green Belt purposes (taken together) of the remaining Green Belt when considered across the area of the plan” (ref. Paragraph: 003 Reference ID: 64-003-20250225).*
- 4.26 The February 2025 PPG also includes information on proposals on grey belt land. It confirms that:
- “An assessment of Green Belt will (alongside other considerations) inform the determination of applications which involve reaching a judgement as to whether proposals utilise grey belt land and whether development of the site would fundamentally undermine the purposes of the remaining Green Belt across the plan area.*
- Where grey belt sites are not identified in existing plans or Green Belt assessments, it is expected that authorities should consider evidence, in light of this guidance, on:*
- *whether the site strongly contributes to the Green Belt purposes a, b or d; and*
 - *whether the application of policies to areas and assets of particular importance identified in footnote 7 to the NPPF (other than Green Belt) provide a strong reason to restrict development; and*
 - *whether development of the site would fundamentally undermine the purposes of the remaining Green Belt across the plan area, as set out in national policy and this guidance. Paragraph: 009 Reference ID: 64-009-20250225”*
- 4.27 In considering what circumstances should proposals on grey belt land be approved, the PPG confirms as follows:

“Where a site is judged to be grey belt, and to not fundamentally undermine the purposes of the remaining Green Belt across the plan area if released or developed, wider considerations will still be relevant to the consideration of development proposals on the site. These would include determining whether the development would not be inappropriate development in the Green Belt, as set out in paragraph 155 of the NPPF. That question would include consideration of whether a development is sustainably located, whether it would meet the ‘Golden Rules’ contributions (where applicable), and whether there is a demonstrable unmet need for the type of development proposed.

Where a development is not inappropriate in the Green Belt, this does not itself remove the land from the Green Belt nor require development proposals to be approved. In accordance with section 38(6) of the Planning and Compulsory Purchase Act 2004, wider policies and considerations apply, including those in the area’s adopted Plan, and in the NPPF read as a whole. Paragraph: 010 Reference ID: 64-010-20250225.”

Sequential test for flood risk

- 4.28 The latest PPG on Flood risk and coastal change was updated in September 2025. Key points arising from the updates to the PPG include:
- 1 the removal of the blanket requirement to conduct a flood risk sequential test (FRST) even when a site-specific flood risk assessment demonstrates that the development can be made safe throughout its lifetime without increasing elsewhere;
 - 2 Addition of a reference that a “*proportionate approach should be taken*” to the application of NPPF paragraph 175 (relating to the positioning of built development in areas at risk of flooding), stating in particular that:
“where site-specific flood risk assessment demonstrates clearly that the proposed layout, design, and mitigation measures would ensure that occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the development [...] without increasing flood risk elsewhere, then the sequential test need not be applied”; and
 - 3 Addition of provisions which clarify how applicants should formulate FRST methodologies and assessments (albeit there is still no comprehensive methodology for the assessment of alternative sites in the NPPF or PPG, with the appropriate scope of the Sequential Test remaining a matter for the decision-taker to conclude).
- 4.29 The aim of the sequential approach is identified as:

The approach is designed to ensure that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk. This means avoiding, so far as possible, development in current and future medium and high flood risk areas considering all sources of flooding including areas at risk of surface water flooding. Avoiding flood risk through the sequential test is the most effective way of addressing flood risk because it places the least reliance on measures like flood defences, flood warnings and property level resilience features. Application of the sequential approach in the plan-making and decision-making process will help to ensure that development is steered to the lowest risk areas, where it is compatible with sustainable development objectives to do so, and developers do not waste resources promoting proposals which would fail to satisfy the test. Other forms of flooding need to be treated consistently with river and tidal flooding in mapping probability and assessing vulnerability, so that the sequential approach can be applied across all areas of flood risk" (7-023)

The Statutory Development Plan

- 4.30 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the Statutory Development Plan at the Site comprises:
- 1 Guildford Borough Local Plan: strategy and sites 2015 - 2034 (adopted 25 April 2019) ("the LPSS")
 - 2 Guildford Borough Local Plan: Development Management Policies (adopted 22 March 2023) ("the LPDMP")
 - 3 Saved policy NRM6 of the Southeast Plan (adopted 6 May 2009) relates to the TBHSPA.
- 4.31 Appropriate weight should be added to the relevant policies in each plan having regard to the age of the plan, the extent of development needs that they sought to meet and the extent of compliance between the relevant policies and the NPPF.
- 4.32 The Site is subject to the following designations in the Statutory Development Plan:
- 1 Green belt
 - 2 TBHSPA 0-400m 'exclusion zone', and 400m to 5km 'zone of influence'.
 - 3 Impact Risk Zone ('IRZ') of the Ash to Brookwood Heaths SSSI
- 4.33 The following planning policies are relevant to the determination of the Application and are considered in the Planning Assessment section below:

Guildford Borough Local Plan

- S1 Presumption in favour of sustainable development
- S2 Planning for the borough - our spatial development strategy
- H1 Homes for all
- H2 Affordable homes
- P2 Green belt
- P4 Flooding, flood risk and groundwater protection zones

- P5 Thames Basin Heaths Special Protection Area
- E5 Rural economy
- D1 Place shaping
- D2 Climate change, sustainable design, construction and energy
- D3 Historic environment
- ID1 - Infrastructure and delivery
- ID3 Sustainable transport for new developments
- ID4 Green and blue infrastructure

Guildford Borough Local Plan: Development Management Policies

- H7 First Homes
- P6 Protecting Important Habitats and Species
- P7 Biodiversity in New Developments
- P8 Land Affected by Contamination
- P9 Air quality and Air Quality Management Areas
- P11 Sustainable surface water management
- D4 Achieving high quality design and respecting local distinctiveness
- D5 Protection of amenity and provision of amenity space
- D6 External servicing features and stores
- D7 Public realm
- D11 Noise impacts
- D12 Light impacts and dark skies
- D14 Sustainable and low impact development
- D15 Climate change adaptation
- D16 Carbon emissions from buildings
- D18 Designated heritage assets
- D19 Listed buildings
- D23 Non-designated heritage assets
- ID6 Open space in new developments
- ID9 Achieving a comprehensive Guildford Borough Cycle Network
- ID10 Parking standards for new development

South East Plan

- NRM6 - Thames Basin Heaths Special Protection Area

Other Material Considerations

Emerging Local Plan

- 4.34 At an extraordinary meeting on 21 February 2024, GBC resolved to update the LPSS. On 27 February 2025, GBC's Executive agreed a timetable for preparing a new Local Plan. The Local Development Scheme (LDS) agreed at this meeting states a Regulation 18 consultation will take place in September – October 2026, a further Regulation 19 consultation in 'Spring 2028' with submission of the plan for examination (Regulation 22) in Autumn 2028. It is not anticipated there will be a new adopted local plan in Guildford until at least mid-2029.
- 4.35 On the basis that there is not even a Regulation 18 consultation local plan in the public domain at this time, there is no material to attach any weight to in the consideration of the Application.
- 4.36 GBC conducted a Call for Sites exercise from 14 March 2025 to 13 June 2025, to which the Site was submitted. It is assumed the submissions to the Call for Sites are currently being analysed by GBC to inform local plan preparations.

Supplementary Planning Documents (SPDs)

- 4.37 GBC's adopted SPDs are relevant to the determination of the Application and comprise the following:
- 1 Climate Change, Sustainable Design, Construction and Energy SPD (October 2024, factually updated May 2025)
 - 2 Green belt SPD (2023) This has been updated for the NPPF December 2023, but not the NPPF December 2024
 - 3 TBHSPA Avoidance Strategy SPD (2017, factually updated 2021 and 2024)
 - 4 Planning Contributions SPD (2017)
 - 5 Residential Design Guide SPD (2004)

5.0 Planning Assessment

- 5.1 This section sets out an assessment of the relevant planning issues associated with the proposed development. Given the nature of the proposed development, in outline, with all matters reserved except access, many of the assessments consider the broader impacts of development. The finer design details and consideration of other development management matters will be assessed at reserved matters stage.
- 5.2 The following areas are considered specifically relevant.
- a Principle of development
 - i NPPF Presumption in favour of development
 - ii Grey belt (including five-year housing land supply (5YHLS) assessment)
 - iii Green belt
 - b Housing
 - i Residential quantum and mix
 - ii Affordable housing
 - c Design and layout
 - d Open space and play space
 - e Landscape impact and green infrastructure
 - f Trees, ecology and biodiversity
 - g Flood risk and sustainable drainage
 - h Transport and parking
 - i Heritage and archaeology
 - j Noise
 - k Air quality
 - l Ground conditions
 - m Energy and sustainability
 - n Agricultural Land Classification

A) Principle of development

- 5.3 This section considers the principle of residential development in relation to the green belt.

Presumption in favour

- 5.4 The LPSS contains policy S1 which relates to the presumption in favour of sustainable development and states:

“Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision, then the Council will grant permission unless material considerations indicate otherwise.”

- 5.5 Irrespective of GBCs acknowledgement that they cannot demonstrate a 5YHLS (Five-Year Housing Land Supply Interim Position Statement dated the 1 April 2025) the Application will be determined in a context where relevant housing need and spatial policies (including LPSS Policies S2 and P2) are out of date, as such Policy S1 will be engaged.
- 5.6 LPSS Policy S2 plans for the delivery of 562 dwellings per annum (dpa) over the plan period (2015 – 2034), this is substantially below the latest local housing need figure derived from the standard method for Guildford which is 1,168 dpa². This policy is therefore out of date and reduced weight is applied to this policy.
- 5.7 LPSS Policy P2 concerns the green belt. The broad thrust of the policy is in line with the national policy because it defers to the NPPF. However, it is out of date because it does not reflect paragraph 155 of the NPPF (December 2024). Notwithstanding this, the proposed scheme accords with both parts (1) and (2) of Policy P2 because the NPPF states grey belt is a new exception to inappropriate development in the green belt.

Grey belt

- 5.8 The NPPF (December 2024), as with the previous NPPF³, maintains that new buildings are generally ‘inappropriate development’ within the green belt. There are exceptions to this as set out at NPPF paragraph 154.
- 5.9 The NPPF introduces an additional ‘exception’, “grey belt” land where proposals on such land meet the requirements of parts a) to d) of paragraph 155 of the NPPF. Paragraph 155 states:
- “The development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where all the following apply:*
- “a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;*
- b. There is a demonstrable unmet need for the type of development proposed;*
- c. The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and*
- d. Where applicable the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156-157 below.”*
- 5.10 As expanded upon below the NPPF (para 158) goes on to state that “a development which complies with the Golden Rules should be given significant weight in favour of the grant of planning permission.”
- 5.11 Our assessment of both the status of the application site as “grey belt” land and the proposed development against each of the subsequent criteria at paragraph 155 of the NPPF is set out below.

² This comprises calculating 0.8% of stock in Guildford at 2024 which amounts to 489, then uplifting by 138.7% (for every 1% the affordability ratio is above the baseline of 5, a 0.95% uplift applies) based on the latest affordability ratio data published in May 2025 which shows a ratio of 12.3 over the past five years, in Guildford.

³ For the avoidance of doubt, all other references to “the NPPF” in this document are references to the December 2024 NPPF.

A. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining green belt across the area of the plan

- 5.12 The NPPF (December 2024) introduced the concept of grey belt to facilitate the development of certain green belt sites outside of the plan-making process. “grey belt” is defined in Annex 2 of the NPPF as (Lichfields emphasis):

“For the purposes of plan-making and decision-making, ‘grey belt’ is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. ‘Grey belt’ excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development”.

- 5.13 The PPG provides further guidance on the assessment of the contribution to the green belt purposes a), b), and d). Table 4.1 below summarises the PPG’s explanation on the green belt purposes and the illustrative features for strong contribution to the green belt purposes.

Table 4.1 Assessment of land against green belt purposes (a) (b) (d)

Green belt Purposes	Illustrative features for strong contribution
<u>Purpose (a): to check the unrestricted sprawl of large built-up areas</u> (Relates to the sprawl of large built-up areas. Villages should not be considered large built-up areas.)	- Assessment areas that contribute strongly are likely to be free of existing development, and lack physical feature(s) in reasonable proximity that could restrict and contain development. - They are also likely to include all of the following features: - be adjacent or near to a large built-up area - if developed, result in an incongruous pattern of development (such as an extended “finger” of development into the green belt)
<u>Purpose (b): to prevent neighbouring towns merging into one another</u> (Relates to the merging of towns, not villages.)	- Assessment areas that contribute strongly are likely to be free of existing development and include all of the following features: - forming a substantial part of a gap between towns - the development of which would be likely to result in the loss of visual separation of towns
<u>Purpose (d) – to preserve the setting and special character of historic towns</u> (relates to historic towns, not villages. Where there are no historic towns in the plan area, it may not be necessary to provide detailed assessments against this purpose.)	- Assessment areas that contribute strongly are likely be free of existing development and to include all of the following features: - form part of the setting of the historic town - make a considerable contribution to the special character of a historic town. This could be (but is not limited to) as a result of being within, adjacent to, or of significant visual importance to the historic aspects of the town

Source: PPG Reference ID: 64-005-20250225

- 5.14 In considering the green belt purposes in relation to the proposed development, the planning application is accompanied by a 'Technical Note: green belt and openness analysis' prepared by Leyton Place. A summary of the findings as they relate to the performance of the proposed development against purposes a), b) and d) is summarised below.

Technical Note: green belt and openness analysis

- 5.15 The Technical Note reviews GBC's green belt and countryside studies (over four volumes) which are of relevance to the Site. They have been prepared over a number of years. The Site is located within land parcel H17 (but forms part of, rather than the entire parcel), with K9 between the Site and the eastern edge of Ash. Critically, GBC's evidence base does not reflect the current national green belt policy and guidance in the NPPF(December 2024) and the green belt PPG 'Advice on the role of green belt in the planning system'. As a result, the contents of GBC's evidence base are now out of date.
- 5.16 In addition, Parcel H17 is larger than the application site whereas the assessment of grey belt for the application is site specific (and does not align with the H17 parcel).
- 5.17 With regards to purpose a), at the time of GBC's analysis H17 was not adjacent to Ash, nor was it near to the edge of Ash. With the planned expansion of Ash (via Policy 31), land parcel H17 is now close to the settlement edge (see DAS page 50)which shows the new context of the Site). The land parcel is near to the built-up area of Ash; however, it is contained by residential development to the north (Pinewood Road) and east (Wyke Avenue). These features could restrict and contain development within H17.
- 5.18 Although the analysis of parcel H17 provides an important contribution, the assessment undertaken for this planning application is for the red line boundary of the Site and not parcel H17. As a result of being enclosed by existing development, new development would not result in an incongruent pattern of development at the Site and is consistent with the manner in which Ash has grown with the support of GBC's spatial planning strategy. This analysis indicates that the land parcel makes a **low contribution** to purpose (a).
- 5.19 With regards to purpose (b), Wyke is a collection of residential properties, built as a single project set around a minor loop road, indeed it is so small it is not listed as a village within the borough of Guildford (see green belt study, Volume III and the Local Plan Policy P2, and Guildford Borough Settlement Hierarchy, May 2014). In the context of the published settlement hierarchy, Wyke is listed in the loose knit/hamlets category which sits below small villages. Guildford to the east is too distant from H17 for there to be any discernible functionality in terms of preventing coalescence between Ash and Guildford. It is a very small part of this gap and makes no contribution to visual or perceptual separation. H17 does not perform a functional role in terms of maintaining a gap between towns, and nor does the Site, it makes **no contribution** to this purpose.
- 5.20 With regards to purpose d), H17 does not form part of the setting of a historic town and has no visual, perceptual, or experiential connection to any historic towns. H17 and the Site make **no contribution** to this purpose.
- 5.21 The analysis undertaken by Leyton Place concludes that the Site does not perform strongly against any one of the purposes a), b) or d). Therefore, for the purposes of decision taking, and based on the Site and proposed development, the Site can be considered to meet the

definition of ‘grey belt’ set by the NPPF subject to consideration against the subsequent tests.

NPPF Footnote 7

5.22 Footnote 7 states:

“The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 189) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change.”

5.23 For the avoidance of doubt those sites listed in paragraph 189 are ‘National Parks, the Broads and National Landscapes’, which are repeated in footnote 7.

5.24 The Site does not fall within a National Park, the Broads, a National Landscape, a Site of Special Scientific Interest, Local Green Space, defined Heritage Coast, irreplaceable habitat, designated heritage assets or an area of coastal change.

5.25 The Site lies partially within an area of surface water flood risk but due to the real-world level of flood risk and proposed scheme mitigation as addressed in the FRA, the applicant is not required to undertake a sequential test. As per PPG 7-027 the FRA provided as part of this submission demonstrates *“clearly that the proposed layout, design, and mitigation measures would ensure that occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the development [...] without increasing flood risk elsewhere”*.

5.26 Minor visual changes to the setting of two heritage assets are found as a result of the proposed development. This less than substantial harm is considered to be at the low end of the spectrum. The heritage balance at paragraph 215 of the NPPF is undertaken later in this section. It finds that the public benefits of the appeal scheme are more than sufficient to outweigh the identified harm to the significance of the designated heritage assets.

5.27 In conclusion, there are no constraints in relation to the Site that fall within footnote 7 of the NPPF which would represent a *“strong reason”* for refusing or restricting the proposed development.

Purposes (taken together)

5.28 The second part of paragraph 155(a) considers the implications for the wider green belt of developing a grey belt site and requires consideration of all five green belt purposes, taken together.

5.29 This is fully assessed within the Technical Note prepared by Leyton Place. The Technical Note concludes that land parcel H17 does not contribute to the green belt purposes (a) to (d) in any measurable way and nor does the Site. Furthermore, the Technical Note concludes the Site has no strategic role in terms of the openness of the green belt. Even within Guildford Borough, its spatial contribution is limited to the eastern edge of Ash.

- 5.30 Based on the evidence within the Technical Note, summarised above, it is concluded that the development would not undermine the purposes of the remaining green belt across the area of the Local Plan and therefore part (a) of paragraph 155 is met.

b. There is a demonstrable unmet need for the type of development proposed

- 5.31 The footnote to this criterion states:

“Which, in the case of applications involving the provision of housing, means the lack of a five-year supply of deliverable housing sites, including the relevant buffer where applicable, or where the Housing Delivery Tests was below 75% of the housing requirement over the previous three years.”

- 5.32 GBC has set out in a Five-Year Housing Land Supply Interim Position Statement dated the 1 April 2025 that they accept GBC are no longer able to demonstrate a 5YHLS.

- 5.33 GBC stated in the Interim Position Statement that next 5YHLS would be published in summer 2025 as part of the annual update to GBC’s Land Availability Assessment (LAA), but at the time of submission of the Application it had not been published.

- 5.34 To understand the extent of the 5YHLS shortfall in the absence of a published position by GBC, an exercise has been undertaken below to compare the latest local housing need figure for GBC using the standard method, with the stated supply position of GBC over the period 2024/25 to 2029/30 as a proxy position. However, it should be noted that the GBC’s stated housing supply has not been scrutinised as part of this planning application. On this basis there is a possibility that GBC’s supply (and thus 5YHLS) has been overstated.

- 5.35 In the report ‘Five Year Housing Land Supply GBC Factual Update – December 2024’, GBC identified a supply of 3,552 homes from 1 April 2024 to 31 March 2029. Notwithstanding that this position is now c.18 months out of date, it is the latest published position of GBC that is available. The LPSS is now more than five years old having been adopted in April 2019 and GBC has not reviewed the strategic policies and found them not to require updating. Therefore, in line with paragraph 78 of the NPPF, the local housing need figure utilised using the latest method now applies for 5YHLS calculations in GBC. This is 1,168 dpa.

- 5.36 The requirement over a five-year period and applying a 5% buffer (as per NPPF paragraph 78) amounts to 6,132 dwellings. Compared with the above identified supply of 3,552 dwellings, the shortfall is significant at **-2,580 dwellings**. Meaning using these figures, GBC could only demonstrate a **2.9 year supply**.

- 5.37 There is therefore conclusively a demonstrable unmet need for the type of development proposed

c. The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework

- 5.38 Paragraph 110 and 115 state that:

“110. The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.”

“115. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

(a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;

(b) safe and suitable access to the site can be achieved for all users;

(c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and

(d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.”

5.39 As is set out in the Transport Assessment (TA) which accompanies this submission, the Site is highly sustainable and will offer a genuine choice of transport modes, not least by the ability to walk along the PROW within the Site straight to Ash train station in 8-9 minutes or cycle in 3 minutes, but also along Guildford Road to services and facilities.

5.40 There are also bus stops on Guildford Road abutting the Site offering sustainable options to travel between Aldershot and Guildford. The proposals for the scheme include a range of improvements to encourage sustainable travel as set out in the TA. The TA also demonstrates that safe and suitable access to the Site can be achieved for all users, the parameters of the scheme allow for design of streets, parking areas, etc. to reflect current national guidance and it has been demonstrated that impacts on the highway network can be satisfactorily mitigated.

5.41 On this basis, the Site clearly forms a sustainable location and therefore Part c of Paragraph 155 is met.

d. Where applicable the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156-157 below

5.42 Paragraph 156 states that the “Golden Rules”, which set out the contributions that major development involving housing on grey belt sites should provide, are as follows:

“(a) affordable housing which reflects either: (i) development plan policies produced in accordance with paragraphs 67-68 of this Framework; or (ii) until such policies are in place, the policy set out in paragraph 157 below;

(b) necessary improvements to local or national infrastructure; and

(c) the provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces.”

5.43 As noted above the NPPF (para 158) states:

“A development which complies with the Golden Rules should be given significant weight in favour of the grant of permission.”

5.44 Each of these ‘golden rules’ in relation to the planning application is addressed in turn below.

Affordable housing

5.45 Paragraph 157 states:

“before development plan policies for affordable housing are updated in line with paragraphs 67-68 of this Framework, the affordable housing contribution required to satisfy the Golden Rules is 15 percentage points above the highest existing affordable housing requirement which would otherwise apply to the development, subject to a cap of 50%. In the absence of a pre-existing requirement for affordable housing, a 50% affordable housing contribution should apply by default. The use of site-specific viability assessment for land within or released from the Green Belt should be subject to the approach set out in national planning practice guidance on viability.”

5.46 Policy H2 of the LPSS states that 40% will be sought on sites providing 11 or more homes, meaning the cap in paragraph 157 applied and 50% affordable housing is required for the scheme.

5.47 In the context of NPPF paragraphs 156 and 157, the applicant proposes 50% affordable housing to ensure compliance with national policy. Therefore, based on an affordable housing provision of 50%, ‘golden rule’ Part A of Paragraph 156 is met.

5.48 This is in a context where that West Surrey Strategic Housing Market Assessment: Guildford Addendum Report 2017 identifies an affordable housing need for GBC of 517 households per annum over the 19-year period from 2015 to 2034. However, over the period 2015/16 to 2023/24 the GBC Authority Monitoring Report 1 April 2023 – 31 March 2024 states delivery of only 768 homes⁴, or an undersupply of 3,885 units in the past nine years – based on an assessment which is lower than total housing need within GBC identified through the subsequent standard method.

5.49 In the context of the huge under-supply in the delivery of affordable housing in the Borough over many years, the provision of affordable housing on this scheme represents a very significant benefit.

⁴ See Table 6 of the GBC Authority Monitoring Report 1 April 2023 – 31 March 2024. Affordable homes completed in Guildford borough 2015/16 = 125, 2016/17 = 32, 2017/18 = 111, 2018/19 = 89, 2019/20 = 62, 2020/21 = 78, 2021/22 = 110, 2022/23 = 40 and 2023/24 = 121.

Necessary improvements to local or national infrastructure

- 5.50 The proposed development will deliver improvements to local and national infrastructure including financial contributions (as justified) for primary and potentially other healthcare health services and education which we anticipate will be agreed with the statutory consultees during determination of the Application.
- 5.51 On site improvements include a range of play spaces and a significant area of publicly accessible open space. Surface improvements will also be made to the PROW that runs east to west across the Site.
- 5.52 Significant improvements to encourage sustainable travel around the Site also include:
- Delivery of a new access junction providing pedestrian as well as vehicular facilities;
 - Contributions to enhance the Guildford Road / Wyke Lane and Guildford Road / Harpers Road junctions in the form of pedestrian facilities, dropped kerbs and tactile paving;
 - A contribution to improve facilities at the most appropriate eastbound and westbound bus stops near to the Site; and
 - A contribution to the strategic Guildford Road Cycle Network.
- 5.53 Therefore, 'golden rule' Part B of Paragraph 156 is met.

New or improvements to existing Green Spaces that are accessible to the public

- 5.54 A significant quantum of new green space will be provided as part of the proposals. There is provision of just over 5ha of open space on the Site which is set by the parameter plans. Based on the requirements of LPDMP Policy ID6, the scheme of up to 200 dwellings would create occupancy of 480 people which generates an overall open space requirement of 1.29ha. This is far exceeded by the proposed development, with the exact nature of the green spaces would be considered at the reserved matters stage.
- 5.55 Therefore, 'golden rule' Part C of Paragraph 156 is met.

Grey belt Summary

- 5.56 Based on the above assessment of the Site and the proposed development, it is considered that for the purposes of decision taking the Site should be considered 'grey belt' when assessed against the NPPF. The relevant green belt assessments, undertaken by the LPA and which precede the current NPPF, support the analysis by Leyton Place that the smaller site within parcel H17 of their assessment (the Application Site) meets the definition of grey belt and there are no strong reasons for refusal related to NPPF footnote 7.
- 5.57 As the Site and proposed development form a grey belt proposal and meet the tests at paragraph 155 of the NPPF (including the 'Golden Rules'), the proposals should not be regarded as inappropriate and there is no requirement to undertake the balance at paragraph 153 of the NPPF. There is also no harm to weigh in the overall planning balance to any harm to the Green Belt, including harm to its openness. Conversely paragraph 158 of

the NPPF confirms that *“a development which complies with the Golden Rules should be given significant weight in favour of the grant of permission”*.

- 5.58 Furthermore, paragraph 11d) ii) of the NPPF is engaged. As the provisions of paragraph 155 of the NPPF are met, there are no policies relating to the areas or assets in footnote 7 which were found to provide a strong reason for refusing or restricting development, paragraph 11d) i) of the NPPF is already satisfied.

Green belt

- 5.59 Notwithstanding our position regarding the grey belt definition set out above, if the development site is considered not to benefit from paragraph 155 of the NPPF, then the balance at paragraph 153 of the NPPF applies.
- 5.60 The recognised approach to the balance under paragraph 153 was summarised by the court in *Wildie v Wakefield* (2013) EWHC 2769 which states: 29. [...] *in considering whether to allow development in the Green Belt, the decision maker must consider, first, the ‘definitional’ harm arising from the inappropriate development as well as such further harm to the Green Belt as is identified as being caused by the development in that case [and any other non-Green Belt harm], and then secondly consider countervailing benefits said to be served by the development; and then consider whether those benefits clearly outweigh the harm so as to amount to very special circumstances.*
- 5.61 *Secondly, in order to qualify as “very special”, circumstances do not have to be other than “commonplace” i.e. they do not have to be rarely occurring...*
- 5.62 In accordance with Paragraph 153, consideration has been given to the harm to the green belt taking into account the fundamental aim of Paragraph 142 which is *“to prevent urban sprawl by keeping land permanently open, the essential characteristics of Green Belts are their openness and their permanence”*.
- 5.63 The Technical Note on green belt prepared by Leyton Place undertakes a comprehensive assessment of the Site’s contribution within the green belt and the impact of the proposed development. The analysis in the Technical Note concludes that the Site makes no contribution to the second, or fourth green belt purposes, and only a moderate contribution to the first and third purposes. Turning to openness, the proposals will result in the reduction of visual and spatial openness, however, this reduction is limited in geographic extent to the Site itself and minimised by the placement of the development parcels within a limited area of the land parcel and the provision of appropriate compensatory improvements.
- 5.64 As noted above, the balance at paragraph 153 of the NPPF, requires the harm by reason of inappropriateness (to which substantial weight must be given) and any other harm is “clearly outweighed” by “other considerations”. This is considered further in the planning balance in Section 7.

B) Housing

Paragraph 61 of the NPPF confirms that the overall aim should be to meet an area’s identified housing need, including with an appropriate mix of housing types for the local community.

Residential quantum and mix

- 5.65 This outline planning application seeks permission for a development of up to 200 homes. Housing mix is a consideration for the reserved matters stage. As part of the Application submission an Illustrative Scheme – as detailed in the ‘Sketch Site Layout’ plan (drawing ref. 25034/P101) – has been submitted which show how at a scheme that accords with the submitted Parameter Plans could provide for a wide choice of homes to meet a range of accommodation needs to accord with LPSS Policy H1(1).

(3 and 4) Space Standards and Accessible Homes:

- 5.66 LPSS Policy H1(3) requires all developments conform to national space standards (as does Policy D1[2] of the LPSS) and LPSS Policy H1(4) requires developments greater than 25 homes to deliver 10% of new homes to the M4(2) standard with a further 5% meeting the M4(3) standard. These are both reserved matters.

(9 & 10) Self Build:

- 5.67 LPSS Policy H1(9) and H1(10) require 5% of all homes on developments greater than 100 dwellings to be provided for self-build and custom housebuilding plots whilst there is an identified need for said homes. These plots would then need to be marketed for at least 18 months.
- 5.68 Against LPSS Policy H1, the proposed development would be expected to provide a minimum of 10 plots for self-build and custom housebuilding. However, it will be for a future reserved matters application to consider the need for these plots as well as their size and their location within the Site.
- 5.69 It is of note that to date there has been a steady supply of self-build plots that has generally kept up with needs (as shown in Table 13 in the GBC 2023/24 AMR). However, GBC will need to continue to grant a steady flow of new plots to meet future needs (noting the requirements to deliver self-build and custom housing plots only applies to schemes greater than 100 homes).

Affordable housing

- 5.70 As noted above the Application proposes a 50% affordable housing provision, which accords with the ‘Golden Rules.’ and which will be secured via a legal agreement (see Section 6 of this report). This is above the minimum 40% provision sought by Policy H2(2) in the LPSS and therefore the scheme accords with the development plan and material considerations in this respect.
- 5.71 As noted above, the housing mix for the proposed development will be addressed at the reserved matters stage.

Summary on new homes

- 5.72 The proposed development is in accordance with LPSS Policy H1 and will contribute towards the Government’s objective of significantly boosting the supply of homes (NPPF Para 61). A variety of accommodation types will create an inclusive and well-rounded community.

C) Design and Layout

- 5.73 Detailed design matters will be addressed at the reserved matters stage. A framework is built into the DAS and Parameter Plans to deliver a high quality scheme which meets the aforementioned policies.
- 5.74 The proposal will comply with the design intent of the NPPF paragraphs 131 and 135 and local policy and guidance centred on design. The proposal positively accords with policy intentions centred on design, height and layout.

D) Open space and play space

- 5.75 We summarise above the scheme's compliance with the "*golden rule*" relating to green spaces.
- 5.76 Paragraph 103 of the NPPF confirms that access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change.
- 5.77 The standards for open space in new developments are set by LPDMP Policy ID6.
- 5.78 In addition, LPSS Policy D1 (Place Shaping) requires developments to be designed to maximise linkages between green spaces and public spaces, including high quality landscaping. LPSS Policy ID1 (Infrastructure and Delivery) requires developments to be supported by necessary infrastructure, the definition of which includes 'open space' (as per Paragraph 4.6.2).
- 5.79 The Green Infrastructure Parameter Plan creates the ability to deliver a network of open spaced areas across the Site having regard to the relevant planning policy as these matters are progressed at the reserved matters stage.

E) Landscape impact and green infrastructure

- 5.80 Leyton Place has confirmed that LPSS Policy P1 gives rise to no implications in the determination of the Application as the Site is not in the setting of the National Landscape.
- 5.81 LPSS Policy D1 requires (1) all new developments to achieve high quality design that responds to distinctive local character (including landscape character) of the area in which it is set. It also requires (4) all new development will be designed to reflect the distinct local character of the area and will respond and reinforce locally distinct patterns of development, including landscape setting. (7) requires all new development to be designed to maximise the opportunity for linkages between green spaces and public places and include high quality landscaping that reflects the local distinctive character.
- 5.82 Part (17) concerns villages and their relationship with the surrounding landscape. Wyke is a collection of somewhat sporadic residential developments, built as a single project set around a minor loop road. In the context of the published settlement hierarchy, Wyke is listed as a loose knit/hamlet which sits below small villages. The Site is located on the edge of Ash. Part (18) in seeking to protect and enhance the existing character of Ash & Tongham and Ash Green requires proposals within the area to have particular regard to:

- a The relationship and connectivity with the existing urban area
- b The relationship and connectivity between allocated sites in different ownerships
- c The existing character of Ash & Tongham and Ash Green
- d The future urban edge and its relationship with the surrounding countryside at the allocated site's boundaries

5.83 Policy ID4 of the LPSS recognises that a positive approach to the provision and maintenance of Green Infrastructure is crucial to the protection and enhancement of biodiversity and wildlife in the borough.

LVIA

5.84 A Landscape and Visual Impact Assessment (LVIA) has been produced by Leyton Place and submitted as part of the Application.

5.85 As a starting point in assessing the current value of the landscape the LVIA confirms in Section 3 that the application site is:

- not directly affected by designations or policies such as SSSI, Habitat Sites, Local Green Space, National Landscape, National Park, Heritage Coast, Irreplaceable habitats, Areas at risk of flooding or coastal change or designated heritage assets;
- not within the setting of any landscape designations; and
- There are no national or district indicators of value that would place the application site at the mid to upper end of the spectrum of value.

5.86 It goes on to conclude (para 3.28) that

“There are no indicators that result in the Site meeting or exceeding the threshold to be considered to be a ‘Valued Landscape’. However, it is clear that there are a number of elements (footpath and field boundaries) which are of value to the natural environment. The value of the Site is in the low to mid-range of the spectrum.”

5.87 The LVIA notes (para 7.13) that it is inevitable that there will be significant effects of developing new homes on a green field site when measured against the existing baseline.

5.88 However (para 7.14) further mitigation measures are recommended to contain the effects to the Site and minimise the disruption to the public. These are likely to be controlled by planning condition.

5.89 In terms of significant landscape effects, the LVIA concludes that the following significant and adverse effects, taking account of the mitigation measures adopted and embedded through the design evolution, will arise from the construction and operational phases of the development:

- Impacts on the suburban settlement edge during the construction phase resulting from the disruptive aspects of the development of new homes, which will be experienced over a local area, within the influence of the Site (short-term, localised).
- Impacts on the character of the Site during the construction phase, and loss of the open rural character.

5.90 The following significant beneficial effects (long-term, and local to Ash not the wider borough) effects have been assessed to be a consequence of the proposed development:

- Increase in vegetative cover, particularly in respect of trees.
- Increased accessible space and connected routes.

5.91 In terms of significant visual effects, the LVIA concludes that the following significant and adverse visual effects will arise during the construction phase:

- The views of people walking on footpath 357 and the pedestrian paths alongside Guildford Road.
- Impacts on views of residents in those properties which overlook the Site during the construction phase (short-term and localised).
- Significant adverse effects will remain for the residents oriented west on Wyke Lane.

5.92 The weight to be attributed to landscape harm for these proposals must be set in the context that a whilst the site is not a “*valued landscape*” and the landscape value of the site is in the low to mid range of the spectrum. Conversely a significant part of the administrative boundary of Guildford Borough contains a National Landscape to which the NPPF (paragraph 189) requires great weight to be given to conserving and enhancing landscape and scenic beauty in National Landscapes.

5.93 The Site is located on the edge of Ash and is associated with a landscape to which GBC has directed change through allocations in its adopted development plan. Furthermore, with the significant increase in local housing need derived from the standard method for Guildford Borough, it is inevitable Guildford Borough must continue to grow.

5.94 The landscape harm identified is related to the construction stage and / or short term with significant beneficial effects in the longer term.

5.95 Similarly, the significant visual effects are also short term with the exception of the impacts for residents oriented west on Wyke Lane.

5.96 The significant adverse effects (both landscape and visual), identified are therefore largely short term and localised to the application site and its immediate environs and are inevitable of any development on a field, Therefore, landscape harms resulting from this proposal are afforded moderate weight.

Outline Landscape Masterplan

5.97 The Outline Landscape Masterplan which accompanies this application provides an overall approach to the landscape strategy. It serves to demonstrate how the proposals can be accommodated into the receiving landscape to respond to local context and character, demonstrating compliance with LPSS Policy D1 (1), (4), and (18). Further, in accordance with Policy D1 (7), the Illustrative Landscape Masterplan demonstrates how the proposals will maximise the linkages between green spaces on the site and beyond, including through the provision of new recreational routes and the existing PROW.

5.98 With regards to LPSS Policy ID4, the approach to the masterplan, informed by the landscape analysis ensures that the proposals are led by the landscape requirements to provide blue and green multifunctional Green Infrastructure.

F) Trees, ecology and biodiversity

Trees

- 5.99 An Arboricultural Impact Assessment (prepared by Aspect) has been produced for the Application. Relevant national planning policy as it pertains to trees is set out in detail in section 3 of this Assessment.
- 5.100 LPSS Policy ID4 (Green and Blue Infrastructure) states that GBC will maintain and enhance biodiversity. The LPDMP also includes a number of policies that relate to trees, including:
- **Policy P6 (Protecting Important Habitat and Species)** –sets out GBC’s approach to irreplaceable habitats, ancient woodland, and ‘significant trees’. The definition of ‘significant trees’ includes all trees covered by a Tree Preservation Order (‘TPO’) or of TPO quality. Developments are expected to incorporate such trees, root structures, and understorey in undeveloped land within the public realm and to provide linkages between them (P6[5]); and
 - **Policy P7 (Biodiversity in New Developments)** – this policy sets out the general principles of achieving biodiversity net gains on-site (considered below). However, in terms of trees part (6) of the policy expects existing tree canopies to be retained with new tree planting to focus on creating connected/extended canopies. Tree’s planted are also expected to provide resilience in terms of climate, disease and ageing, incorporating large species with long lifespans where opportunities arise; and
 - **Policy D7 (Public Realm)** – requires inter alia tree-lined streets in new developments.
- 5.101 There are no ancient woodlands either within the Site or within the influence of the application area. There are also no ancient, veteran, or potentially veteran trees within the Site. There are trees and hedgerows covered by a TPO. These are therefore ‘significant trees’ as defined by LPDMP Policy P6. Accordingly, the iterative process has adopted a precautionary approach with their retention and safeguarding a foremost concern.
- 5.102 The proposed development is landscape led and seeks to retain existing trees and hedgerows where possible, as shown on the submitted Green Infrastructure Parameter Plan for approval (drawing ref. 25091-C104).
- 5.103 To accommodate the proposed developments primary vehicular access and pedestrian access points from Guildford Road, it will be necessary to remove two trees of individual distinction, and clear small sections from two tree groups. The design has focussed on low quality examples of their type that are consistent with Category C.
- 5.104 To facilitate connectivity with the proposed residential parcel of the development, it will be necessary to cross a belt of trees afforded protection under TPO No. 8/2017. Where tree removal is unavoidable to accommodate the required widening, it will be limited to clearing a small section of young self-set trees which are presumed to have established since the TPO was made and are therefore unlikely to be covered by the order.
- 5.105 Based on the proposed Parameters Plan for the residential parcel of the development, it will be necessary to remove four trees of individual distinction and clear an intermittent group

of young ornamental planted trees. Among the individual trees identified for removal is a tree currently scheduled under TPO No. 8/2017. However, the tree is exhibiting a markedly poor physiological condition, deterioration has likely occurred since the TPO was made and in this instance, the preferred option is to provide a compensatory strategy. In this context, despite a small conflict with policy P6, the harm resulting from the proposed loss of the tree protected under TPO No. 8/2017 is outweighed by the quantum of proposed new planting, including significant increase in canopy cover.

- 5.106 The proposed development will also affect four category C hedgerows, one for the emergency access to Wyke Lane and three to accommodate the residential parcel of the development. The Outline Landscape Masterplan provides detail of compensatory hedgerow planting.
- 5.107 The proposed development will result in a modest reduction in canopy cover prior to compensation. However, with the implementation of compensatory planting and landscape enhancements, the development will deliver a significant net gain in canopy cover across the Site. This increase will enhance the Site's capacity to provide ecosystem services over the long term and mitigate the effect. The proposal will also improve opportunities for the public to view and appreciate retained trees from a wider range of locations and perspectives, contributing positively to the public amenity value of the Site.
- 5.108 In respect of the NPPF (Paragraph 136) and LPDMP Policy D7 requirement for tree-lined streets, this will be a matter for consideration at the reserved matters stage.

Ecology and biodiversity net gain

- 5.109 The NPPF states that development should contribute to and enhance the natural and local environment (Paragraph 187), protecting and enhancing valued landscapes and Sites of biodiversity value and minimising impacts on and providing net gains for biodiversity.
- 5.110 LPSS Policy ID4 (Green and Blue Infrastructure) requires developments to maintain, conserve, and enhance biodiversity (ID4[1]). It also requires new developments to deliver gains in biodiversity (ID4[2]) among other requirements including for all developments within or adjacent to Biodiversity Opportunity Areas ('BOA').
- 5.111 In addition, LPSS Policy P5 (Thames Basin Heaths Special Protection Area) states development will only be granted for development proposals where it can be demonstrated that doing so would not give rise to adverse effects on the integrity of the Thames Basin Heaths Special Protection Area ('SPA') (P5[1]). It goes on to note that no net increases in residential development should take place within 400m of the edge of the SPA (P5[2a]). Furthermore, any residential development between 400m and 5km – within the 'zone of influence' must provide for avoidance and mitigation measures in perpetuity (P5[2b]).
- 5.112 LPDMP P6 (Protecting Important Habitats and Species) sets out a range of criteria in relation to development on sites that include or are adjacent too irreplaceable habitats, habitats hosting priority species, for designated biodiversity sites. In addition, LPDMP Policy P7 (Biodiversity in New Developments) includes a number of relevant policy criteria to outline proposals including:

- **(2 & 3) BOAs** – development adjacent to BOAs should contribute to the objectives of the BOA, protect and enhance designated and priority habitats and species with the BOA, and improve habitat connectivity into the BOA; and
- **(12 – 17) Biodiversity Net Gain** – all qualifying development is expected to deliver a biodiversity net gain ('BNG') of at least 20%. Where developments cannot achieve these gains on-site, off-site gains must be secured.

5.113 The Application is accompanied by an Ecological Impact Assessment Report (including SANG statement) prepared by FPCR. The report shows that through a combination of intrinsic mitigation, targeted mitigation, compensation and ecological enhancement, the proposals will lead to negligible effects on all Important Ecological Features, apart from bats and reptiles for which a Not Significant Positive effects are considered likely.

5.114 With regards to LPDMP Policy P6, although some small hedgerow sections (Habitat of Principal Importance) will be lost, the proposals retain the majority of native hedgerows and provides new species-rich native hedgerow planting which will compensate for this loss. The scheme therefore complies with this policy.

5.115 The assessment below considers the proposed development against the key ecology and BNG issues.

Thames Basin Heaths SPA

5.116 The development site is partly located within both the 400m 'exclusion zone' and the 'zone of influence' around the SPA. The 400m exclusion zone extends into the northern part of the Site. In line with paragraph 2.4 of the Thames Basin Heaths SPA Avoidance Strategy (2017) SPD, there is no net increase in residential units within this zone as a result of the proposal, rather it is retained as landscaping (as per the Parameter Plans submitted for approval). All residential development is proposed within the 400m – 5km 'zone of influence'. Therefore, suitable avoidance and mitigation measures need to be implemented.

5.117 No 'Suitable Alternative Natural Greenspace' ('SANG') is proposed within the Site itself (noting the open space provided does not meet the requirements for SANG). The applicant is progressing several options for off-site SANG provision to mitigate against the possible increase in recreational pressure, this will be secured via a legal agreement (see Section 6 of this Planning Statement). Therefore, the proposed development will accord with the relevant elements of LPSS Policies P5 and ID4, and LPDMP Policy P7.

Biodiversity net gain

5.118 The precise biodiversity net gain that can be achieved on-site can only be calculated based on a detailed scheme. It will therefore be a matter for future consideration at the reserved matters stage. Notwithstanding, the development is accompanied by an Ecological Impact Assessment & SANG Statement and the BNG Statutory Metric prepared by FPCR. This shows that the development of the Site can achieve 20% BNG required by LPDMP Policy P7 on site for hedgerows and watercourses and will likely require proportionate off-site credits for habitat units to make up the difference. Notwithstanding, the provision of on-site and off-site gains that add up to a 20% net gain will ensure a future development accords with LPDMP Policy P7, as well as the statutory BNG duty.

Ecology and BOAs

- 5.119 As set out in the Ecological Impact Assessment which accompanies this submission, the Site is dominated by a horse grazed grassland with a mixture of species-poor and species rich grassland and acid grassland to the north. There are five internationally designated sites of nature conservation importance within 15km of the Site and two nationally designated site within 2km of the Site. Eight Sites of Importance for Nature Conservation fall within 1km of the Site's boundary, but none within the boundary itself.
- 5.120 Part of the southern boundary of the Site is adjacent to the edge of the 'Wanborough and Normandy Woods and Meadows' BOA. This area of the Site is proposed to as part of the wider landscaping to 'open space'.

G) Flood risk and sustainable drainage

Flood Risk

- 5.121 The NPPF paragraph 181 states that development should only be allowed in areas of flood risk where it can be demonstrated that the most vulnerable development is located in areas of lowest flood risk, the development is appropriately flood resistant and resilient, it incorporates sustainable drainage systems, any residual flood risk can be safely managed, and safe access and escape routes are included.
- 5.122 In respect of Flood Risk, LPSS Policy P4 (Flooding, Flood Risk and Groundwater Protection Zones) sets out relevant policy to manage flood risk in new developments. LPDMP Policy P10 (Water Quality, Waterbodies and Riparian Corridors) also sets out relevant criteria to ensure developments consider their water quality impacts to nearby waterbodies as well as their impact to existing watercourses. There is also a policy criterion to have regard for relevant Environment Agency position statements in relation to Source Protection Zones and Drinking Water Protected Areas.
- 5.123 A 'Flood Risk Assessment' ('FRA') (prepared by Aegaea) accompanies the Application.
- 5.124 The Site is wholly within Flood Zone 1. Examination of the EA's Flood Risk from Surface Water mapping shows that parts of the Site are at risk of flooding in 'High' surface water flood events. A site specific 2D pluvial / direct rainfall model has been undertaken to understand the risk of surface water flooding to the Site layout from this source. Upon completion of the modelling, it was observed that the extents were different. Aegaea utilised the site-specific topographic survey (April 2025, ref. 35799) which is believed to demonstrate a more accurate representation of levels across the Site to enable an assessment of the risk of flooding to the Site from surface water (compared to the National LiDAR programme data dated 2023.) Furthermore, the Aegaea model increases the impact of climate change up to 2125 whereas the current EA outputs only include up to 2040-60.
- 5.125 The FRA confirms that the outputs show residential dwellings and the emergency access are located outside of all the modelled return periods. The primary access could be affected by flooding in the modelled return periods, but the depth of flooding would be 0.23m in a 1 in 100-year event (+ 45% climate change allowance). Surface water would be collected and conveyed by the road drainage system so the risk from flooding would be effectively managed.

- 5.126 The PROW could also be affected by flooding in the modelled return periods, but this reflects the existing situation. It is proposed to introduce a light gravel covering to the PROW to improve the existing user experience. The alternative route to using the PROW is to use the pedestrian links onto the Guildford Road. A footway to the south of the Site is shown to be affected by all modelled return periods. However, this footway is displayed on an illustrative plan only and does not form the basis of the parameters for which the Application is seeking consent. The footway is not critical to the function of the site

Drainage

- 5.127 NPPF Paragraph 181 requires that developments demonstrate that, inter alia, they incorporate sustainable drainage systems. LPSS Policy P4 also requires that SuDS are given priority in new developments to manage surface water drainage.
- 5.128 A Drainage Strategy (prepared by Aegaea) accompanies the Application.
- 5.129 A sustainable drainage strategy, involving the implementation of SuDS, is proposed for managing surface water on the Site (feasibility to implement partial infiltration features will be investigated during detailed design for the scheme). On review of the SuDS hierarchy, it is proposed that surface water generated from the proposed development will be managed on site via a number of partial infiltration features, attenuation features such as permeable paving located within parking bays, attenuation tanks, bio-retention areas, swales & attenuation basin. As this is an outline application, the attenuation volume and discharge rates are subject to change during detailed design stage.
- 5.130 As such, the requirements of LPSS Policy P4 are met.
- 5.131 Foul drainage for the residential development is proposed to connect into the existing Thames Water public sewer network via a pump station. Thames Water has confirmed their preferred point of connection would be existing MH 5101 on Guildford Road.

Sequential test for flood risk

- 5.132 As set out above, the Site is wholly within Flood Zone 1 but there are areas at risk of surface water flooding. The September 2025 revised wording of relevant PPG⁵ disappplies the requirement to conduct a sequential test where an individual FRA for the Application clearly demonstrates that the development has been designed so it is safe from current and future flood risk. The 2025 PPG also now includes a recommendation that a proportionate approach should be taken to the application of NPPF para 175, which relates to the location of built development in areas at risk of flooding (new PPG 7-027). In relation to surface water flood risk, the PPG is clear that the findings of a site-specific FRA can mean that a sequential test is not required to be conducted.
- 5.133 The FRA which accompanies this the Application (summarised above) shows it can be clearly demonstrated that the proposed layout, design and mitigation measures would not increase flood risk elsewhere and would keep occupiers and users safe from current and future surface water flood risk.

⁵ 7-023 and 7-027, relating to Flood Risk and Coastal Change

- 5.134 Therefore, with regard to PPG 7-027, it is not necessary for the Application to be accompanied by a Sequential Test to consider whether there are other reasonably available sites appropriate for the proposed development on areas with lower risk of flooding. Such a report is specifically not required by the PPG.

H) Transport and parking

- 5.135 Paragraph 110 of the NPPF requires “*significant development*” to be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and also improve air quality and public health. The sustainability credentials of the Site are assessed in Part M below.
- 5.136 Paragraph 116 of the revised NPPF confirms that only if there would be an ‘unacceptable impact on highway safety’ or when residential cumulative impacts, following mitigation, are ‘severe’ should proposals be refused on transport grounds.
- 5.137 Policy ID1 (Infrastructure and Delivery) of the LPSS states that necessary infrastructure is required to support new development and available when needed. This is both to support new occupants but also mitigate against developments otherwise adverse impacts. Building on this, LPSS Policy ID3 (Sustainable Transport for New Developments) sets out several relevant criteria for new developments:
- **Walking, cycling, and public transport (1-2):** ID3 requires new developments contribute to maximise sustainable transport modes including walking, cycling, and the use of public and community transport. This is to be achieved through, inter alia, the provision of cycle parking, improvements to existing cycle and walking routes, and permeable site layouts.
 - **Vehicle parking (4) and car clubs (5):** Off-street parking levels should be provided such that levels on parking on the public highway does not adversely affect road safety/movement. Consideration also needs to be given for relevant parking standards and whether car clubs might be appropriate.
 - **Access and transport infrastructure (6):** Developments will need to provide a suitable access and other transport infrastructure to mitigation otherwise material impacts.
- 5.138 Furthermore, Policy ID9 (Achieving a Comprehensive Guildford Borough Cycle Network) of the LPDMP sets out GBC’s policy approach to realise a cycle network across the Borough. As shown on the Proposals Map, Guildford Road (bounding the north of the Site) forms part of what will become this wider cycle network⁶: identified as ‘Strategic Cycle Corridor 17’. Identified routes will be the starting point for potential cycle improvements provided by and/or funded by new developments.
- 5.139 LPDMP Policy ID10 (Parking Standards for New Developments) also states that for non-strategic sites the provision of vehicle and cycle parking should have regard for the standards within the ‘Parking Standards for New Development SPD’. The policy also sets out other criteria related to vehicle parking relating to the size of parking spaces, the

⁶ ‘Rest of Borough – Existing and Proposed Routes’

delivery of electric vehicle charging points, and whether garages count towards parking provision.

5.140 The Application is accompanied by Transport Assessment and a Travel Plan prepared by Mayer Brown. The below considers the proposals against the relevant planning policy set out above.

Access and internal movements

5.141 The primary vehicle access to the Site will be taken from Guildford Road and is provided in 'detail' (i.e. access is not a reserved matter). The location and design of the primary access is shown in document ref. '01-P4'. It is also shown on the submitted 'Land Use Parameter Plan' (drawing ref. 25019 - SK15B) (red dashed line), an extract of which is below (see Figure 5.1).

5.142 From Guildford Road, the primary access road will go south through the northern green space and link to a fixed access point into the residential development area (also shown by the red-dashed line in Figure 5.1 below). While this access point to the development area is fixed the detailed design for this will be sought through future RMA submissions. Note that the precise road route through the northern green space is not fixed by the Parameter Plans. This road will also provide a pedestrian and cycle access into the Site.

5.143 In relation to access, Figure 5.1 also shows:

- **Blue arrow:** New pedestrian access towards existing bus stops north west of the Site along Guildford Road by Ash Playground.
- **Purple dashed line:** Existing PROW to be retained.
- **Orange arrow / line:** Where the emergency vehicle access from Wyke Lane is proposed. This access falls within the detailed element.

Figure 5.1 Access



Source: Land Use Parameter Plan (drawing ref. 25019 - C104)

5.144 The internal road and pedestrian/cycle network will be a matter for future consideration at the reserved matters stage. However, the existing PROW is retained which provides a direct route through the Site straight to Ash train station and beyond. The proposals will be dictated to a large degree by the provision of a central green corridor that splits the residential area into an east and west parcel: as shown on the submitted Parameter Plans. An interpretation of how a suitable internal network could be delivered is shown on the Illustrative Scheme (as shown in 'Illustrative Masterplan' – drawing ref. 25019 – C101). This includes utilising the Site's current vehicle access and using it as a new pedestrian / cycle link. It also includes a comprehensive and legible network of internal roads and paths through the green spaces and development area.

5.145 The proposals include an emergency access on to Wyke Lane along the eastern boundary of the Site, designed for use in the case that the primary access is blocked or if there is an unforeseen emergency at the Site. Given that this access is not designed to be used frequently. It has not been assessed by Mayer Brown as part of the Transport Assessment.

Impact on highways

5.146 The submitted Transport Assessment sets out the impacts of the proposed development. In summary, it concludes:

- The trip generation analysis identifies the proposed residential development is estimated to generate 104 vehicle movements in the morning peak hour and 91 in the evening peak hour. A junction capacity assessment indicates that this form of access would be able to accommodate this level of vehicle movements and operate well within its design capacity.
- The development is anticipated to generate up to 29 pedestrian, 8 public transport and 4 cyclist movements during weekday peak hours. This level of activity is unlikely to have a noticeable impact on the operation of the local transport network.

5.147 Based on the findings of this TA, it is considered that the proposed access and the impact of the development on the local transport network is acceptable.

Strategic cycle corridor

5.148 Guildford Road is identified as being part of the Comprehensive Guildford Borough Cycle Network under LPDMP Policy ID9, which residents of the proposed scheme will be able to access directly from the Site. This policy places an importance on developing cycling infrastructure for the purposes of utility cycling, so as to reduce car dependency for day-to-day use (i.e. use not for leisure). In line with the requirements of policy ID9, the on-site cycle infrastructure proposed at the Site will encourage connections with the Guildford Road Cycle Network. The applicant is willing to explore potential enhancements to utility cycling along Guildford Road that could be provided and/or funded by the development subject to responses from statutory consultee(s) through the determination of the planning application.

Vehicle and cycle parking

5.149 The proposed unit mix and tenure type along with the accommodation schedule, internal layout detail and therefore parking provision will be confirmed as part of a Reserved

Matters submission. However, it is anticipated that car and cycle parking provision will be able to be provided in-line with SCC parking standards.

5.150 The development will also meet the minimum electric vehicle charging standards: defined in LPDMP Policy ID10(3e) as meeting the Building Regulations (Part S) standards.

5.151 Overall, the development would accord with relevant policies in the LPSS and LPDMP.

I) Heritage and archaeology

5.152 Paragraph 210 of the NPPF states that *“in determining applications, local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness.”*

5.153 Paragraph 212 confirms that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. Great weight, in the context of paragraph 212, is consistent with the council’s statutory duty to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess (s.66 of the 1990 Act).

5.154 Paragraph 215 of the NPPF confirms that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. This is referred to as the heritage balance; considerable importance and great weight should be given to the desirability of preserving designated heritage assets. Harm should be weighed against the public benefits arising from the proposed development. This exercise should take into account that the more important the asset, the greater the weight should be.

5.155 In line with the heritage balance at paragraph 215 of the NPPF, consideration is given to whether the identified less than substantial harm to the significance of two designated heritage assets is outweighed by the public benefits of the proposal. In carrying out the balancing exercise, we have had strong regard to the great weight which must be given to the conservation of the heritage assets at York House (GII listed) and East Wyke Farm Cottages (GII Listed). Noting that the proposed development would only result in changes to the wider rural setting of two GII listed assets, the less than substantial harm is considered to be at the low end of the spectrum. Taking into the account the public benefits of the proposal as identified in Section 7.0 below, the public benefits of the proposal outweigh the identified harm. The balancing exercise under paragraph 215 of the NPPF therefore does not constrain the grant of planning permission.

5.156 The balance lies in favour of the proposals, with the series of very substantial, very significant, significant, moderate and limited weights afforded to the range of public benefits found to outweigh the great weight afforded to the conservation of the heritage assets.

5.157 A planning balance must also be considered which is undertaken in Section 7. Paragraph 213 sets out that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require

clear and convincing justification. Meanwhile, paragraph 207 states that where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

5.158 Policy D3 (Historic Environment) in the LPSS states that GBC will conserve and enhance the historic environment in a manner appropriate to its significance, with support given to developments that support this. The impacts of development proposals will also be considered against the relevant tests in law and the NPPF.

5.159 The LPDMP also includes several policies related to the historic environment. Of relevance to this development proposal are:

- **Policy D18 (Designated Heritage Assets):** All developments that affect designated heritage assets must be supported by a Heritage Statement. Also, that any development that results in harm to a designated heritage asset will be considered in line with national policy.
- **Policy D19 (Listed Buildings):** Development proposals are expected to conserve, enhance, or where appropriate better reveal the significance of listed buildings including their settings.

5.160 A Heritage Impact Assessment has been prepared to accompany the application, prepared by Lichfields. It describes the significance of the relevant heritage assets, as required by paragraph 207 of the NPPF. It assesses the effects of the proposed development on four heritage assets which were considered as having the potential to be affected by the proposed development. It concludes that the proposed development would cause less than substantial harm to the significance of York House (GII listed) and East Wyke Farm Cottages (GII Listed) owing to *‘the alteration of the sense of openness and rural character that contributes to the significance of these assets. There would also have an adverse effect on appreciation of the historic association between the application site and East Wyke Farm Cottages’*. The effects would be mitigated as far as possible through buffer zones, tree planting, and existing vegetation.

Archaeology

5.161 An Archaeology Desk-based Assessment has been undertaken for this proposed development by Lichfields. It concludes that given the low to moderate potential of the Site, it is recommended that a geophysical survey is undertaken in areas that are to undergo foundation construction, to ascertain whether any archaeological features of note, particularly the speculated Roman Road, are present. This could be secured by condition, and during the relevant phase, with a Written Scheme of Investigations (at this stage anticipated to cover a programme of monitoring only) agreed with officers at the County Council. Further interventions are not anticipated at this stage.

J) Noise

5.162 The NPPF requires new development to be appropriate to its location when considering the effects of pollution sources including noise and vibration (Paragraph 174). Consequently, planning applications should demonstrate that the development will not unacceptably introduce or be detrimentally sensitive to existing pollution sources, with all applications

expected to demonstrate that new noise sources can be successfully mitigated and/or reduced to minimise potential impacts.

5.163 In respect of noise, LPSS Policy ID3 (Sustainable Transport for New Developments) states that, inter alia, mitigation for new developments should address otherwise adverse impacts relating to noise pollution. The LPDMP also contains several relevant policies to noise and vibration including:

- **Policy D5 (Protection of Amenity and Provision of Amenity Space):** Development proposals are required to avoid unacceptable impacts on the living environment of existing and new residential properties in terms of, inter alia, noise and vibration.
- **Policy D11 (Noise Impacts):** Developments for noise sensitive uses are required to identify potential adverse noise impacts on said sensitive uses and consider potential prevention and mitigation measures.

5.164 A Noise Assessment prepared by Cass Allen has been submitted to accompany the Application. This concludes that – following a review of potential sources of adverse noise against the location of sensitive residential uses within the Site – that no detailed noise assessment is required. The development would therefore not give rise to unacceptable noise impacts on future residents from existing sources of noise. Future detailed designs can also consider how to suitably account for potential on-site and off-site sources of noise.

5.165 Overall, the development would accord with relevant policies in the LPSS and LPDMP.

K) Air quality

5.166 The NPPF seeks to prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable level of air pollution (Paragraph 187).

5.167 Paragraph 199 confirms that “*planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas.*”

5.168 LPDPM Policy P9 (Air Quality and Air Quality Management Areas) states that development proposals should have regard to the need to improve air quality and the effects of poor air quality. Development proposals must also not give rise to significant adverse impacts on sensitive receptors and must be supported by an Air Quality Assessment in a number of circumstances: including where the cumulative effects of developments would have the potential to have significant adverse effects on air quality and also is within close proximity to sensitive habitats.

5.169 An ‘Air Quality Assessment’ has been prepared by Cass Allen (ref. RP01-25458-R0) for the Application. This assessment confirms:

- 1 The Site does not fall within an existing Air Quality Management Area (‘AQMA’) but that the primary source of air pollution is from Guildford Road on the Site’s northern boundary.

- 2 During construction, there will be no significant residual air quality impacts (i.e. from dust) once suitable best practice mitigation measures have been put in place.
- 3 An appraisal of onsite air quality once the development is operational demonstrates that pollutant concentrations are expected to be below relevant Air Quality Objectives. Also, no significant impacts on the local air quality would result from increased vehicle movements caused by the development.

5.170 From the above, the development would not give rise to significant air quality impacts on existing and future residents, with any construction impacts can be suitably mitigated. Note that there were no ecological receptors within relevant screening distances as defined by the IAQM. Therefore, the development accords with LPDMP Policy P9.

L) Ground conditions

5.171 The NPPF states that development proposals should consider the suitability of a development Site, in relation to the level of contaminants, and opportunities for its remediation. Adequate Site investigation should be undertaken to assess the level of contaminants, and as required, remediation should be completed to return land to a level that cannot be considered as contaminated under Part IIA of the Environmental Protection Act 1990 (Paragraph 196). Where land is known to be contaminated, the responsibility to secure a safe remediation of such land is the liability of the developer or landowners (Paragraph 197).

5.172 LPDPM Policy LP8 (Land Affected by Contamination) states that development proposal that include or comprise land known or suspected to be affected by contamination are required to submit site risk assessments.

5.173 A 'Phase 1 and Phase 2 Geo-environmental and Geotechnical Interpretive report' prepared by RSK Geosciences (ref. RP01-25458-R0) has been submitted for the Application. It details a desktop based and follow up intrusive investigations to consider the on-site ground conditions. This work confirms that no soil contamination was found of risk to human health, future planting, or potable water supplies. There is a recommendation to undertake additional monitoring to confirm any ground gas risk close to one borehole. Finally, that there will need to be certain mitigation measures put in place during construction (i.e. prior to the demolition of existing buildings, an asbestos survey must be carried out).

5.174 In summary, the Site is not currently known to be contaminated and therefore the Site accords with relevant policy. Suitable conditions will need to be applied to mitigate any potential contamination risk during construction (i.e. if unknown contamination is found and to undertake specific surveys ahead of demolition works).

M) Energy and sustainability

5.175 Paragraph 161 of the NPPF confirms that *"The planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources,*

including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.”

5.176 **LPSS Policy D2 (Climate Change, Sustainable Design, Construction and Energy)** sets out a range of policy criteria relates to sustainable design and construction, adaptation to climate change, as well as climate change mitigation. It also requires major development proposals to be supported by a Sustainability Statement setting out how the various criteria have been addressed.

5.177 **LPSS Policy D1 (Place Shaping)** sets out the need to have regard to the latest Building for Life Guidance and **Policy ID3 (Sustainable Transport for New Developments)** refer to sustainable transport and cycle parking.

5.178 The LPDMP also includes several relevant policies:

- **Policy D14 (Sustainable and Low Impact Development):** Developments are expected to demonstrate how they have considered the fabric first approach, embodied carbon, energy efficient, waste, and water efficiency in their designs.
- **Policy D15 (Climate Change Adaptation):** This policy requires, inter alia, development proposals to demonstrate how new buildings are designed to provide for the comfort of future occupants over the lifetime of development and include adaptations to severe rainfall events.
- **Policy D16 (Carbon Emissions from Buildings):** This policy sets emission rates for new buildings (defined within building regulations) as well as requirements relating to low carbon heat distribution networks and decentralised energy.
- **Policy ID10 (Parking Standards for New Development):** This policy requires the provision of electric vehicle charging at least the minimum requirements set out in the Building Regulations (Part S).

5.179 A ‘Sustainability & Energy Statement’ prepared by Daedalus Environmental is provided as part of the Application.

Energy

5.180 Design principles are set out which will be applied at the proposed development to ensure that it is ‘zero carbon ready’ from the outset, and will continue on a trajectory to net zero emissions by c.2050 in line with the decarbonisation of the National Grid.

5.181 The Low and Zero Carbon Energy Appraisal has concluded that low carbon air source heat pumps and solar photovoltaic panels are the most suitable options for a residential development of this size in this location and would comfortably meet the requirements of LPSS Policy D2 and LPDMP Policy D14.

5.182 As this is an outline application, there are no fixed designs to model so it has not been possible to complete detailed Building Regulation calculations to establish energy performance, nor the Future Homes Standard or Policies D14 and D16 in full.

5.183 It is concluded that connecting to an existing or installing a new heat network would not be feasible at this proposed development as per LPDMP Policy D16.

Sustainability

- 5.184 It is of note that Policy D1 of the LPSS refers to the 'Building for Life' standards, but this has been replaced by the 'Building for a Healthy Life (BHL) (2020) design tool'. The designs for the proposed development have been tested against the BHL standards in as much detail as possible at this outline planning stage, and it achieves 'green' for all 12 considerations.
- 5.185 Embodied carbon has been considered with regards to material selection, sustainable waste management and flexible design solutions in line with LPDMP Policy D14.
- 5.186 In line with LPDMP Policy ID10, each dwelling with associated parking will have access to an EV charging point which will need to have a minimum nominal output of 7kW and be fitted with a universal socket. However, the actual charging provision to be installed on the Site will be investigated at Reserved Matters once the layout is fixed. Likewise, in line with LPSS Policy ID3, the proposed properties will include a secure and weatherproof means of cycle storage, but the details will be established at the Reserved Matters stage.
- 5.187 In line with LPDMP Policy D14, occupants will be encouraged to manage waste sustainably, and this will be considered in full at the Reserved Matters stage. Furthermore, the dwellings will include water efficient fixtures, fittings and appliances plus rainwater recycling via water butts to ensure that daily water use will be calculated to not exceed the 110 l/p/d target, but the final specification will be established at the Reserved Matters stage.
- 5.188 In line with the requirements of LPSS Policy D2 and LPDMP Policy D15, acceptable strategies for reducing overheating risk are set out in the Sustainability Statement but the dwelling designs will undergo overheating risk modelling at the Reserved Matters Stage. The landscape led approach will provide multiple benefits in a changing climate. Finally, with regards to managing water in a changing climate, please refer to the accompanying FRA and note consideration will also be given to design features such as increased diameter guttering and downpipes to cope with additional intensity of storm water.
- 5.189 Therefore, as far as is possible at the outline planning application stage, the proposed development adheres to development plan Policies D1, D2, ID3, D14, D15, D16 and ID10.

N) Agricultural Land Classification

- 5.190 The NPPF paragraph 187b) states decisions should contribute to and enhance the natural and local environment by "*recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land.*" Best and most versatile agricultural land is defined in Annex 2 of the NPPF as Land in grades 1, 2 and 3a of the Agricultural Land Classification (ALC).
- 5.191 LPSS Policy E5 states that "*Agricultural land will be protected as set out in national policy and the economic and other benefits of the best and most versatile agricultural land will be taken into account.*"
- 5.192 The majority of the Site is located in the 'Urban' category, and the southern area of the Site is located within Grade 4 (Poor) ALC. The Site does not contain best and most versatile land and therefore LPSS Policy E5 is not applicable.

6.0 Planning Contributions

- 6.1 The NPPF (paragraph 56) states that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.
- 6.2 The policy requirements for planning obligations are set out in LPSS Policy ID1 and expanded on in the GBC Planning Contributions SPD 2017.
- 6.3 At this stage based on the GBC policy requirements and subject to discussions with statutory consultees, the following financial contributions/obligations are envisaged to form part of the S106:
- 1 Financial contributions (as justified) for primary and potentially other healthcare health services (subject to consultation responses from the relevant parties).
 - 2 Financial contributions (as justified) for education (subject to consultation responses from the relevant parties).
 - 3 Affordable housing – 50% Affordable Housing (tenure split to be agreed).
 - 4 Provision and ongoing management of both on and off site green infrastructure.
 - 5 Secure the requisite SANG off-site to mitigate impacts on the TBHSPA.
 - 6 SAMM contribution.
 - 7 Travel Plan.
 - 8 Improvement to eastbound and westbound bus stops nearby to the Site.
 - 9 Junction improvements to both the Guildford Road / Wyke Lane and Guildford Road / Harpers Road junctions in the form of pedestrian facilities, dropped kerbs and tactile paving.
 - 10 Potential for a Guildford Road Cycle Network contribution.
 - 11 Off-site BNG related to achieving 20% habitat units.

7.0 Planning Balance

- 7.1 This section sets out our assessment of the planning balance on the basis of the assessment of the scheme in the earlier sections and the identification of harms and benefits that are associated with it.
- 7.2 The balance is struck in two ways. Firstly, and as contended in the Application, on the basis that the Site meets the requirements of paragraph 155 of the NPPF and should therefore not be regarded as inappropriate development in the green belt. Secondly, if the decision-taker decides that the Site does not satisfy paragraph 155 of the NPPF, then the balance is struck under paragraph 153 of the NPPF.

Grey belt – Appropriate Development

- 7.3 The earlier sections of this Statement confirm that paragraph 11d) ii) of the NPPF applies, and the proposed development meets the requirements of Paragraph 155 in the Framework. Therefore (paragraph 11d) i) is addressed in meeting the requirements of paragraph 155 of the NPPF).
- 7.4 Therefore, the proposal should not be regarded as inappropriate development in the green belt and the presumption in favour of development applies.
- 7.5 Planning permission should be granted unless the adverse impacts of doing so significantly and demonstrably outweigh the benefits.
- 7.6 The following weighs in favour of the proposal:
- 1 **The provision of 50% market homes** - very substantial weight is attached to this benefit in the context of the 5YHLS position for the Borough which is currently c.2.9 years.
 - 2 **The provision of 50% affordable housing** - very substantial weight is attached to this benefit in the context of severe under delivery of affordable housing across the borough.
 - 3 **Sustainable development** – very significant weight to utilising the onsite PROW to create an exceptionally well connected and sustainable new development which can reach the train station on foot in 8 minutes or cycle in only 3 minutes. The site is also a sustainable location with access to both other public transport routes and facilities.
 - 4 **Golden Rules** –significant weight is attached to this benefit in accordance with Paragraph 158 of the NPPF.
 - 5 **Sustainable travel infrastructure** – significant weight is attached to the proposed improvements to the pedestrian network, public transport infrastructure (including improvements to facilities at nearby bus stops), and strategic cycle network to encourage sustainable travel for existing and new residents.
 - 6 **Economic benefits** – moderate weight should be attached to the significant economic benefits, including over 120 construction jobs, forecasted £1.3m uplift in yearly local expenditure, and an uplift of £570,000 in council tax revenues (see Appendix 1 for the full suite of economic benefits that the scheme would deliver).

- 7 **Junction improvements** – moderate weight is attached to the enhancements to both the Guildford Road / Wyke Lane and Guildford Road / Harpers Road junctions in the form of pedestrian facilities, dropped kerbs and tactile paving.
- 8 **Introducing public views towards the Surrey Hill National Landscape** – moderate weight is attached to this benefit.
- 9 **A significant net gain in canopy cover across the Site** – moderate weight is attached to this benefit which enhances the Site's capacity to provide ecosystem services.
- 10 **Biodiversity Net Gain** – limited weight is attached to this benefit.
- 11 **Surface improvements to existing PROW that runs east to west across the Site** – limited weight is attached to this benefit which improves the existing user experience.
- 12 **Improved opportunities for the public to view and appreciate retained trees** - limited weight is attached to this benefit as contributing positively to the public amenity value of the Site.

7.7 The following harms weigh against the proposal:

- 1 Less than substantial harm at the lower end to two heritage assets settings. In line with NPPF paragraph 212 great weight is given to this harm.
- 2 Localised landscape and visual harm associated with the construction phase and primarily persisting in the short-term only is afforded moderate weight.
- 3 Loss of one tree protected by a Tree Protection Order ('TPO') is afforded limited weight owing to its deteriorated condition since the TPO was granted.

7.8 Paragraph 11(d)(ii) is engaged, the adverse impacts of the development (or harms) do not significantly and demonstrably outweigh the benefits and permission should be granted.

Green belt – Inappropriate Development

7.9 Notwithstanding our position, and the applicants do not consider that the application would not benefit from paragraph 155 of the NPPF, if the development site is considered not to benefit from paragraph 155 of the NPPF, then the balance at paragraph 153 of the NPPF applies.

7.10 The Technical Note on green belt prepared by Leyton Place undertakes an assessment of the Site's contribution within the green belt and the impact of the proposed development.

7.11 With regard to the effect of the proposed development on the openness of green belt, it notes that the proposals will result in the reduction of visual and spatial openness, however, this reduction is limited in geographic extent to the Site itself and minimised by the placement of the development parcels within a limited area of the land parcel and the provision of appropriate compensatory improvements.

7.12 Under this scenario, the benefits set out above in paragraph 7.6 weigh in favour of the proposals.

7.13 Under this scenario, the harms set out in paragraph 7.7 weight against the proposals, with the addition of the following:

- **Green belt** –the impact on the green belt is given substantial weight as required by Paragraph 153 of the NPPF.

7.14 The combination of the various benefits of the proposed development with their associated weights clearly outweigh the identified harm to the green belt and the other harms identified above.

7.15 On the basis of the above balance, the proposed development clearly meets the test as defined by paragraph 153 of the Framework and permission should be granted.

8.0 Conclusions

- 8.1 Section 38(6) of the PCPA 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise.
- 8.2 The proposal is in accordance with the development plan overall, however, policies S2 and P2 are out of date. Notwithstanding, this section goes on to consider whether there are material considerations which indicate that the proposal should be determined other than in line with the development plan.
- 8.3 As the Site is grey belt and meets the tests at paragraph 155 of the NPPF (including the 'Golden Rules'), the proposals should not be regarded as inappropriate and there is no requirement to undertake the balance at paragraph 153 of the NPPF. There is also no harm to weigh in the overall planning balance to any harm to the Green Belt, including harm to its openness. Conversely paragraph 158 of the NPPF confirms that *"a development which complies with the Golden Rules should be given significant weight in favour of the grant of permission"*.
- 8.4 As GBC is unable to demonstrate a 5YHLS, paragraph 11(d) of the NPPF indicates that planning permission should be granted unless: (i) the application of policies in the Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or (ii) any adverse impacts of doing so significantly and demonstrably outweigh the benefits, when assessed against policies in the Framework taken as a whole. As the provisions of paragraph 155 of the NPPF are met, there are no policies relating to the areas or assets in footnote 7 which were found to provide a strong reason for refusing or restricting development⁷. As such, the tilted balance is engaged so planning permission should be granted unless the adverse impacts of doing so significantly and demonstrably outweigh the benefits.
- 8.5 Weighing in favour of the proposal is the provision of market homes and affordable housing which both individually carry very substantial weight. Delivery of sustainable development carries very significant weight. Delivery on the Golden Rules and sustainable travel infrastructure both individually carry significant weight. Economic benefits, junction improvements, introducing public views towards the Surrey Hill National Landscape and a significant net gain in canopy cover across the Site all individually carry moderate weight. Finally, BNG, surface improvements to existing PROW which improves the existing user experience and improved opportunities for the public to view and appreciate retained trees both individually carry limited weight.
- 8.6 Weighing against the proposal is less than substantial harm to the setting of two designated heritage assets which carries great weight. Localised landscape and visual harm which carries moderate weight. The loss of a tree protected by a TPO, which carries limited weight against the proposal.
- 8.7 In sum, the benefits in this case clearly outweigh the harms, even without the application of the tilted balance. In the context of paragraph 11(d)(ii), the adverse impacts of the development (or harms) do not significantly and demonstrably outweigh the benefits.

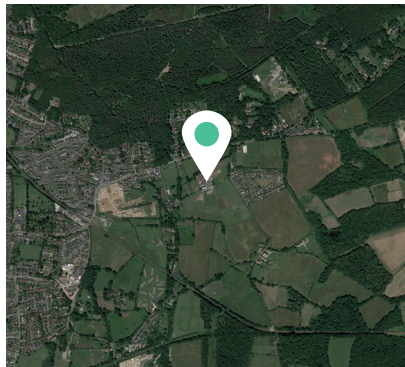
⁷ Less than substantial harm to heritage assets triggers the balancing exercise under paragraph 215 of the Framework, this is undertaken at paragraph 5.155 of this Statement and does not constrain the grant of planning permission.

- 8.8 If the development site is considered not to benefit from paragraph 155 of the NPPF, then the balance at paragraph 153 of the NPPF applies. The combination of the various benefits of the proposed development with their associated weights clearly outweigh the identified harm to the green belt and the other harms identified above.
- 8.9 In applying s.38(6) of the PCPA 2004, the development is in accordance with the development plan and the material considerations in this case indicate that permission should be granted – indeed a number of benefits arise.

Appendix 1 Economic Benefits Infographic for Land at Shortland Farm

Land at Shortland Farm

The proposed development at Shortland Farm, Guildford, will deliver up to 200 new homes of which 50% will be affordable homes. This scheme will drive economic growth, help meet Guildford's housing needs and increase the local authority's revenue.



The proposal



200 New homes

Other details:

The proposal will also deliver enhancements to the public footpath running through the site, as well as amenity space provision. In addition there will be new green corridors for biodiversity enhancement and informal recreation including on site Biodiversity Net Gain and Sustainable Drainage system (SuDS) throughout.

Construction benefits



c. £30m
Construction value
(total construction cost)



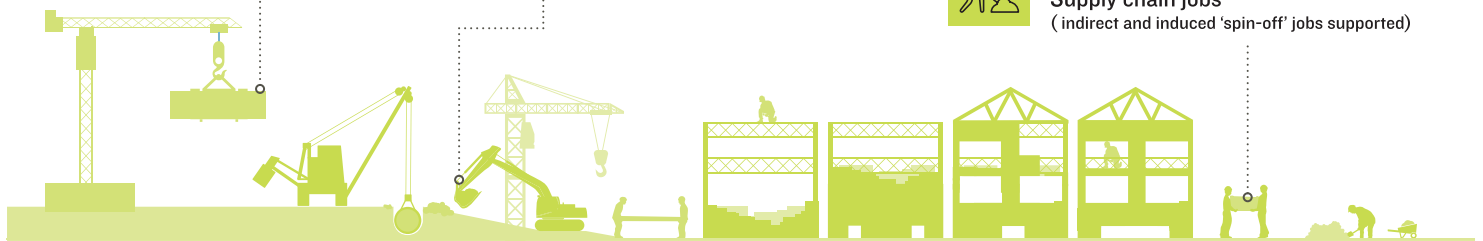
£31.7m GVA
Economic output
(additional GVA p.a.)



123 Jobs
Construction jobs
(temporary jobs over the approx 3.5 year build period)



137 Jobs
Supply chain jobs
(indirect and induced 'spin-off' jobs supported)



Operational and expenditure benefits



£1.5m
First occupation expenditure
(spending to make a house 'feel like a home')



£1.3m
Resident expenditure
(within local shops and services p.a.)



16 Supported jobs
(from increased expenditure in local area)



Local Authority revenue benefits



£570,000
Council Tax revenues
(p.a.)



Significant net gain in tree canopy cover leading to enhanced ecosystem capacity. Alongside hedgerow and watercourse enhancements, new green corridors will help to achieve an overall biodiversity net gain of at least 20%.



Infrastructure enhancements, including to the public footpath running through the site, new and existing vehicular junctions, and local bus stops.



Contributions to community infrastructure through s106 agreements, including to education and healthcare services (subject to demand identified by statutory consultees).



Appendix 2 Planning History

- 2.1 Application ref. 25/S/00002 - Request for an EIA Screening Opinion under the Town & Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended). **Screening opinion issued on 27 Aug 2025**
- 2.2 Application ref. 20/T/00169 - 7 x Oaks (G6) - crown lift over paddock to 5 metres (Tree Preservation Order No. 8 of 2017). **Tree Works Approved on 14 August 2020**
- 2.3 Application ref. 17/P/00507 - Outline permission for a residential development consisting of 300 units (105 affordable) with all matters reserved. **Refused 8 September 2017.**
- 2.4 Application ref. 17/S/00003 - Town and Country Planning (Environmental Impact Assessment) Regulations 2011 - Request for Screening Opinion (Regulation 5) for a proposed residential development (outline) for 300 units. **Submitted 6 February 2017 but GBC portal states 'Take no further action 12 July 2021'.**
- 2.5 Application ref. 02/P/00610 - Stationing of a caravan for a temporary period for an Agricultural/Equine worker. **Appeal Allowed on 14 May 2003**
- 2.6 Application ref. 02/P/00675 - Proposed replacement barn, addition of pitched roof to existing stable block and new stable block. **Application withdrawn 10 January 2003**

Birmingham
0121 713 1530
birmingham@lichfields.uk

Edinburgh
0131 285 0670
edinburgh@lichfields.uk

Manchester
0161 837 6130
manchester@lichfields.uk

Bristol
0117 403 1980
bristol@lichfields.uk

Leeds
0113 397 1397
leeds@lichfields.uk

Newcastle
0191 261 5685
newcastle@lichfields.uk

Cardiff
029 2043 5880
cardiff@lichfields.uk

London
020 7837 4477
london@lichfields.uk

Thames Valley
0118 334 1920
thamesvalley@lichfields.uk

@LichfieldsUK

lichfields.uk