

PLANNING STATEMENT

+ AFFORDABLE HOUSING STATEMENT

LAND AT 2 HEATH BARN COTTAGES

SEND MARSH ROAD

SEND

GU23 7DQ

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1. INTRODUCTION

- 1.1 This Planning Statement is provided on behalf of Virtus Design & Build in support of an application for express planning consent at land at 2 Heath Barn Cottages, Send Marsh Road, Send.
- 1.2 The application site, as defined by the red line on the submitted location plan, is within the administrative authority of Guildford Borough Council.
- 1.3 Express planning consent is sought for the *removal of existing built form and hardstanding and erection of a 1 ½ storey and single storey buildings providing one 2 bed house, one 3 bed house and a 3 bed bungalow. (2.no open market and 1no. intermediate affordable housing), cycle & bin store, car parking, associated access, and landscaping.*
- 1.4 The application site is adjacent to the defined settlement of Send and is accessed from Send Marsh Road to the south of the site and via an existing, lawful access.
- 1.5 The site is broadly wedge shaped with the western boundary the deepest part of the site. Boundaries are strongly defined by fencing, vegetation and matures trees, some of which lie beyond the site to the north and mark the field boundary. The interior of the site is open and formally maintained as garden, with areas of hardstanding, detached outbuildings and other structures featuring.
- 1.6 The site is within the Green Belt, it is not covered by any national or local landscape designations and there are no other site specific policies that apply.
- 1.7 The proposal seeks to optimise the use of previously developed land in meeting an identified housing need in development that would provide high quality units of accommodation that respond to the prevailing character and appearance of the area and the site's transitional role.
- 1.8 In location terms, Send is a rural local centre defined by the Council's Settlement Hierarchy as a large village. It contains a number of key community services, amenities and facilities, access to public transport and pedestrian, well-lit access to Woking.
- 1.9 To ensure a net gain in biodiversity and landscape enhancements as part of the development, native species-rich landscaping is proposed to the rear (north) boundary and on the parcel of land to the east of the units that form part of the defined red site line.

1.10 This application is a variation (a reduction in built form) to an existing planning consent 22/P/00620. The scheme had to be altered to allow for the recently discovered major water main running through the consented scheme.

1.11

1.12 The proposal is found to accord with local planning policy and national guidance and as such planning permission should, this statement contends, be granted.

1.13 The application is supported by this statement and the following documentation:

- Location Plan
- Site Plan
- Proposed Floor Plans
- Proposed Elevations
- Site Section
- Design & Access Statement
- Technical Highway Note by Bellamy Roberts
- Minimum Internal Space Standards Statement
- Tree survey
- Ecology Report
- Water main map from Affinity Water

2. SITE & CONTEXT

SITE

- 2.1 The site is located to the north of Send Marsh Road and extends to 1,987m² (0.20 hectares), as defined by the red line on the submitted location plan, an extract of which is shown in Figure 1, below.

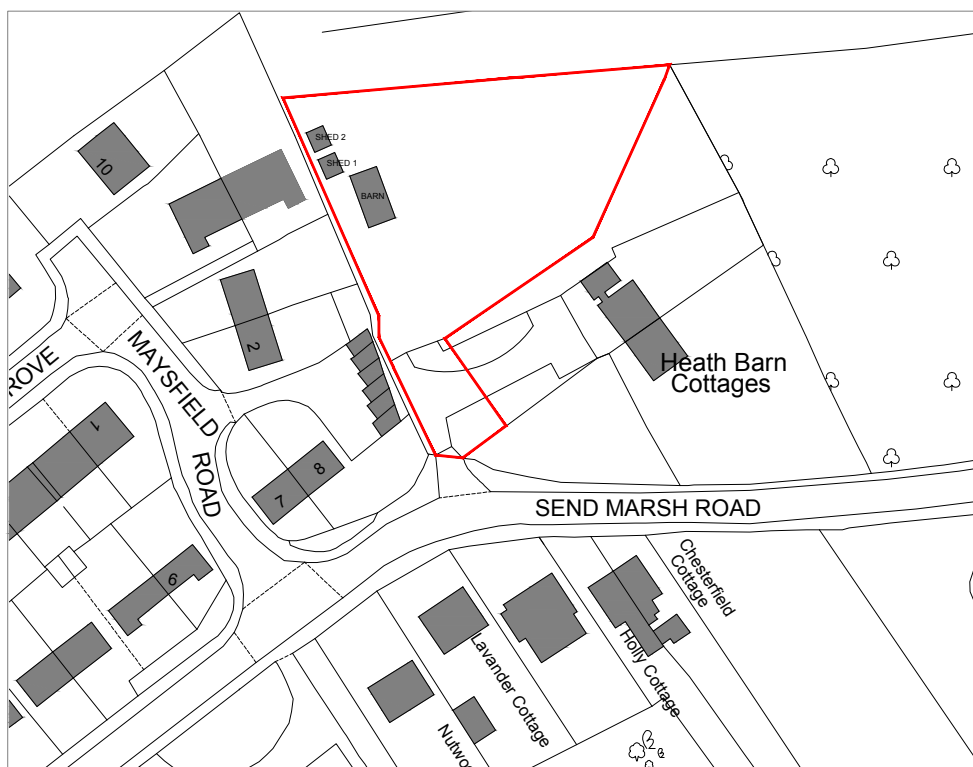


Figure 1 – extract of submitted location plan showing red site line and location of the site

- 2.2 The site is accessed from Send Marsh Road and via the current lawful access that also serves no.1 & no.2 Heath Barn Cottages.
- 2.3 The site is broadly wedge shaped with the widest point adjacent to the western boundary that runs adjacent to public footpath 44.
- 2.4 The site is level and enclosed along all boundaries by close boarded fencing, vegetation and trees.
- 2.5 The site is garden land previously associated with no.2 Heath Barn Cottages and is formally maintained as such, with areas of lawn, planted beds and vegetation featuring throughout. Mature trees also feature just inside the site entrance, with further trees of merit beyond the site to the north marking the adjacent field boundary.

- 2.6 The site is also home to various structures and built form, with a large 1 ½ storey outbuilding and other smaller structures towards the northern boundary and a large fishpond just beyond the eastern boundary. Hardstanding runs from the site entrance all the way to the north-western corner of the site.
- 2.7 The site abuts the built-up area of Send and the properties that form part of Maysfield Road and Mays Grove and is within the Green Belt (GB), as confirmed by the extract of the GBC proposals map shown in Figure 2, below.

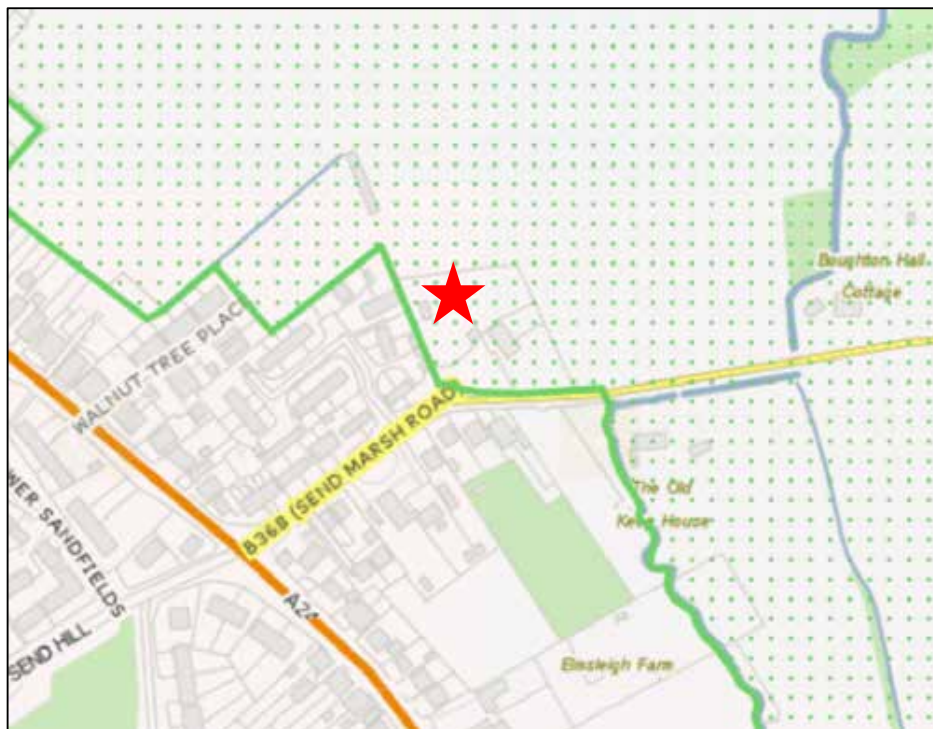


Figure 2 – extract of GBC Proposals Map showing GB boundary (source: GBC)

- 2.8 The site is within Flood Zone 1 and is also within the 400 - 5km Buffer Zones for the Thames Basin Heath SPA. With regard to the latter, the proposal would be required to mitigate for its impact on the conservation interests of the SPA.
- 2.9 The following photographs shown in Figures 3 – 5 show the western boundary taken from footpath 44, the scale of the existing 1 ½ storey outbuilding, and interior of the site looking back towards the properties that lie to the south of Send Marsh Road and provide a backdrop of built form to the site in wider views.



Figure 3 – photograph taken from public footpath 44 to the west of the site looking north



Figure 4 – photograph taken from the north-western corner of the site looking southeast



Figure 5 – photograph from within the garden of no.2 Heath Barn Cottages looking south

CONTEXT

- 2.10 Send is a rural parish located in the northeast corner of Guildford Borough and is bound by the A3 to the south. Send is circa 6.5km to the northeast of Guildford and circa 4.5km to the south of Woking. The parish of Send is made up of the three settlements: Send, Send Marsh and Burnt Common.
- 2.11 Cumulatively, the parish of Send has a population of 4,250 and is served by a wide range of amenities, services and facilities, including a health centre and primary school.
- 2.12 The population live in 1,700 dwellings and compared to the rest of Guildford Borough it has lower levels of social rented, private rented and shared ownership properties, with a significantly lower proportion of households occupying terraced housing (5.3% compared to 13.9%) and flats (7.0% compared to 19.3%) than the rest of the Borough.
- 2.13 The site accesses onto Send Marsh Road (B368) which links Burnt Common to the southwest of the application site with Send Marsh to the east and Send.
- 2.14 The number 462/463 bus stops ('Mays Corner') 170m away on the A247 with an hourly bus services (Monday to Saturday) to the main surrounding centres of Guildford and Woking. From these main centres strategic rail connectivity to London can be found, along with a broad range of employment opportunities, services, amenities and facilities, with Woking specifically offering the nearest supermarket to the site (3 miles).

- 2.15 To the west of the site and bisected by the public footpath 44 shown in Figure 8, are the properties of Maysfield Road and Mays Grove which are mix of semi detached, terraced and detached two storey dwellings and bungalows with elevations finished in brick and gabled and hipped tiled roofs.
- 2.16 To south of the site beyond Send Marsh Road is a modern, two storey infill development. To the east of this is a pair of semi detached two storey properties and to the west a detached two storey period property. These units all front the highway and are set in well defined, linear plots with parking either provided to the frontage or to the side (semi detached properties). The dwellings are of a traditional brick style, with splayed brick lintel details, slate roofs and period void to solid ratios.
- 2.17 To the east of the site is the retained section of garden serving no.2 Heath Barn Cottages which includes a large fish pond, domestic planting and trees. Beyond this is an enclosed paddock and beyond this what appears to be land in use in association with the adjacent residential planning unit.
- 2.18 To the north beyond a strongly defined boundary is an arable field managed under the Energy Crops Scheme by DEFRA as part of their Rural Development Service. The field is bisected centrally by a drainage ditch delineated by trees and vegetation, and around the periphery by mature trees and vegetation with clear breaks that allows views of the properties that front the A247 and Send Marsh Road.

3. PLANNING HISTORY

- 3.1 Whilst there are a number of planning application associated with the donor dwelling, none are considered relevant in the consideration of the current application.
- 3.2 The current application is a revision of 22/P/00620 which sought the erection of four residential units. The Council granted consent and as mentioned above, the only reason for resubmission is the major water main location and inability to implement the existing planning consent.
- 3.3 In comparison to the previous scheme, the following changes have been made as part of the current application:
- The number of proposed units has been reduced by one;
 - Two apartments have been replaced with a house;
 - The mass, scale and quantum of built form has been reduced;
- 3.4 The current application therefore is a reduction from the consented scheme, which helps to mitigate the impact on the green belt.

4. PROPOSAL

- 4.1 Express planning consent is sought for the erection of a single storey and 1 ½ storey building that would provide 1no 1 bed, 1no 2 bed and 2no 3 bed units, 25% of which would be affordable housing, as defined by the NPPF.



Figure 6 – extract of submitted site plan

- 4.2 Plot 1 would have a GIA of 70m², plot 2 would have a GIA of 100m² and plot 3 would have a GIA of 1118m².
- 4.3 The 1 ½ storey building runs northeast to northwest through the site with the detached single unit off towards the eastern corner of the site.
- 4.4 The 1 ½ storey building has a single storey eaves and steep pitch roof with rooms within the roof space served by proportionate, well detailed dormer windows. All plots would be served by private areas of amenity space and all units would have allocated parking.



Figure 7 – extract of proposed front northeast elevation of plots 1 – 3

- 4.5 The single storey detached unit would again be well detailed and vernacular in form with a proportionate area of private amenity space and adequate parking.



Figure 8 – extract of proposed front southeast elevation of plot 4

- 4.6 Vehicular and pedestrian access to the site would be from the existing, lawful access point onto Send Marsh Road.
- 4.7 Landscape enhancements using native species-rich planting are proposed to the northern and southern boundaries of the site.
- 4.8 Cycle storage for plots 1, 2 and 3 would be provided within sheds located in their private areas of amenity space.
- 4.9 Bin and recycling collection point would be provided to the front of the site, as shown on the submitted site plan.

5. PLANNING POLICY

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states, that applications for development must be determined in accordance with the development plan unless material considerations indicate otherwise. Other material considerations include statements of national planning policy set out in the National Planning Policy Framework (NPPF) and National Planning Policy Guidance (NPPG).
- 5.2 The Development Plan for Guildford comprises the saved policies of the Local Plan (2003) that are not superseded (saved September 2007), the Local Plan: Strategy and Sites (2019) (LPSS), Policies Map (2019), South East Plan (2009), and emerging Neighbourhood Plan (NP). Whilst the emerging NP is currently at the Regulation 18 stage and therefore is yet to be made, given its stage of preparation it nevertheless carries substantial weight as part of the decision making process.

NATIONAL PLANNING POLICY FRAMEWORK (2019)

- 5.3 The National Planning Policy Framework (Framework) is a material consideration in the determination of planning decisions. The Framework was revised in 2021, which replaced the 2019 revision and the original 2012 version of the document.
- 5.4 At the heart of the Framework is the presumption in favour of sustainable development. The Framework confirms that the planning system has three overarching objectives that need to be pursued in mutually supportive ways in seeking to achieve sustainable development:
- An economic role to contribute so as to building a strong, responsive and competitive economy. This requires the right type of sufficient land to be available in the right places and the right time to support growth and innovation;
 - A social role to support strong, vibrant and healthy communities by ensuring a supply of housing to meet present and future need, and by creating a high quality built environment; and
 - An environmental role that contributes to protecting and enhancing the natural, built and historic environment.
- 5.5 Paragraph 11 confirms that plans and decisions should apply a presumption in favour of sustainable development, which for decision making means:
- *approving development proposals that accord with an up-to-date development plan without delay; or*
 - *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:*

- *the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
- *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

IDENTIFYING LAND FOR HOMES

- 5.6 Paragraph 69 sets out the Government's objective to significantly boost the supply of homes and the important role that medium and small sites can play.
- 5.7 Importantly in this case, criterion (c) goes on to confirm that LPA should *support the development of windfall sites through their policies and decisions, giving great weight to the benefits of using suitable sites within existing settlements for homes.*
- 5.8 Furthermore, criterion (d) goes on to confirm that LPA *should work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.*

MAKING EFFECTIVE USE OF LAND

- 5.9 Paragraph 119 promotes the effective use of land in meeting housing need whilst safeguarding and improving the environment. Plans should optimise the use of land in their area and meet as much of the identified need for housing as possible, with a significant uplift in the density of residential development unless it can be shown that there are strong reasons why this would be inappropriate (paragraph 123(a)).
- 5.10 Paragraph 120 (criterion d) sets out that decision should *promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.*

ACHIEVING WELL-DESIGNED PLACE

- 5.11 Paragraph 124 makes clear, that the creation of high quality buildings and places is fundamental to the planning process, with good design a key aspect of sustainable development.
- 5.12 Paragraph 130 sets out that planning decision should ensure development function well and add to the overall quality of the area; are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; are sympathetic to the local character whilst not preventing or discouraging appropriate innovation or change,

such as increased densities; and, optimise the potential of sites to accommodate and sustain an appropriate mix of development.

5.13 Paragraph 149 (g) states, that *limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:*

- *not have a greater impact on the openness of the Green Belt than the existing development; or*
- *not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.*

LOCAL PLAN: STRATEGY AND SITES

5.14 The new Local Plan: Strategy and Sites was adopted by the Council on 25th April 2019.

5.15 The spatial vision of the Local Plan sets out how the LPA will plan for the sustainable growth of the borough up to 2034.

5.16 The plan provides for the delivery of at least 10,678 additional homes by 2034, with the plan making provision for approximately 1,200 dwellings on non-strategic sites within and as extensions to existing villages, some of which are now in set from the Green Belt (GB). These dwellings will offer a variety of housing choice in villages and help contribute to supporting local services and the important role they play in village life.

5.17 The relevant policies to the determination of the current application are as follows:

S1	Presumption in Favour of Sustainable Development
S2	Spatial Development Strategy
H1	Homes for all
H2	Affordable Homes
P2	Green Belt
P5	Thames Basin Heaths Special Protection Area
D1	Place shaping
D2	Climate change, sustainable design, construction and energy
ID3	Sustainable transport for new developments
ID4	Green and blue infrastructure

LOCAL PLAN 2003 (SAVED POLICIES)

- 5.18 Saved policies of the Local Plan (2003), despite the adoption of the Local Plan: Strategy and Sites, remain material for the consideration of the current application:

G1	General Standards of Development
G5	Design Code
NE4	Species Protection

SEND NEIGHBOURHOOD PLAN (SNP)

- 5.19 The SNP is at the Regulation 18 stage. Due to COVID 19 the Council are unable to run any NP referendums until May 2021. Whilst SNP is therefore still somewhat off being made, given its stage of preparation and the lack of unresolved objection it still carries substantial weight as part of the decision making process.

Policy 1	Design
Policy 2	Housing Development
Policy 4	Green and Blue Infrastructure
Policy 7	Supporting Sustainable Transport

SUPPLEMENTARY PLANNING DOCUMENTS

- 5.20 Sustainable Design Construction SPD 2011; Thames Basin Heaths Special Protection Area Avoidance Strategy 2017; Residential Design SPG 2004; Vehicle Parking Standards SPD 2006; and Surrey County Council Vehicular and Cycle Parking Guidance 2018.

6. MATERIAL PLANNING CONSIDERATIONS

6.1 The planning considerations that are material in the assessment of the current application, are:

- Principle
- Location
- Openness & Visual Character
- Housing Need
- Affordable Housing
- Housing Mix
- Character & Appearance
- Residential Amenity
- Access & Parking
- Thames Basin Heath SPA
- Ecology
- Other Matters

PRINCIPLE

6.2 The site is within the Green Belt and wherein all new development is inappropriate unless it represents one of the appropriate exceptions to inappropriate development detailed at paragraph 145 and 146 of the Framework.

6.3 Paragraph 149 states, that *limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:*

- *not have a greater impact on the openness of the Green Belt than the existing development; or*
- *not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.*

6.4 Paragraph 4.3.19 of Policy P2 of the new Local Plan is consistent with the above exception to inappropriate development in the GB, stating:

Whilst most forms of development are considered inappropriate in the Green Belt, the NPPF lists certain exceptions which are not inappropriate. These are set out in paragraphs 145 and 146 of the National Planning Policy Framework. The exceptions listed include development such as new buildings for agriculture and forestry, and the redevelopment of previously developed land subject to the impact on the openness of the Green Belt.

- 6.4 For completeness, this is also consistent with criterion (c) of Policy 2 of the SNP.
- 6.5 The High Court judgement in *Dartford Borough Council v Secretary of State for Communities & Local Government (CO/4129/2015)* confirmed, that land outside of built up area can be regarded as brownfield land and therefore previously developed.
- 6.6 Officers in refusing the previous application confirmed that the site was lawful residential curtilage and whilst outside of the defined settlement and therefore Green Belt land, on the basis that the surrounding area “does appear to be reasonably built in character” the site was found to form part of the built up area and thus excluded from the definition of previously developed land. This conclusion is not shared.
- 6.7 The aforementioned High Court judgement was concerned with whether the definition of previously developed land (PDL) within the Framework excluded private residential gardens or just those in built up areas.
- 6.8 The Court held that only residential gardens within the built-up area were exempt from the definition of previously developed land, whereas residential gardens outside built up areas were brownfield. The rational explanation provided by the Court was that undeveloped land in the urban area was at more of a premium and thus required greater protection.
- 6.9 Put simply, different development plan policies apply to the application site based on where the LPA have drawn the boundary with the GB. Had the LPA considered the application site to form part of the built-up area which would have required them to consider the site in character terms and whether it appeared as part of the settlement or continuation of the countryside, they would have re-drawn, as they have done for other sites adjoining settlements, the GB boundary to include it. This was not done as part of the new Local Plan and GB review
- 6.10 In considering the application site and built form to the west, there is a clear shift in the character / pattern of development, with the settlement and built up area higher in density, formulaic in pattern, and fronting the highway.
- 6.11 The application site does not align with these characteristics of the built up area, bearing in mind that it also abuts open fields to the north and east. Instead, the site appears as continuation of the countryside and cannot, therefore, be reasonably regarded as forming part of the built up area.
- 6.12 In appeal from South Gloucestershire from September 2020 (3254913) it is also of assistance in supporting the contention that the site represents PDL despite the appeal being dismissed on other grounds. The Inspector at paragraph 11 sets out the following:

The Framework defines previously developed land (PDL) as land which is or was occupied by a permanent structure, including the curtilage of the developed land. It specifically excludes land in built-up areas such as residential gardens from this definition. The appeal site, whilst close to the built up area, is outside the settlement boundary. As it falls within the grounds of a residential property, it could be considered as PDL. Paragraph 145(g) allows for the partial or complete redevelopment of PDL in certain specific circumstances (our emphasis).

- 6.13 The site is therefore considered to represent PDL and therefore its partial redevelopment can represent an appropriate exception to inappropriate development in the Green Belt, given that the development would *contribute to meeting an identified affordable housing need*, and subject to the development not causing substantial harm to the openness of the GB.
- 6.14 It is therefore maintained that the principle of development is acceptable, subject to all other material considerations.

OPENNESS & VISUAL CHARACTER

- 6.15 Development features across the site, with a significant 1 ½ storey outbuilding towards the north-western corner (and other standard height and scale outbuildings) and an extensive area of hardstanding adjacent to the western boundary that are all to be removed as part of the development.
- 6.16 In comparison to the previous scheme recently approved by the Council, the current application would have a reduced impact on the openness and visual character due to the reduction in built form .
- 6.17 Landscape enhancements continue to form part of the proposed scheme and would assist in knitting the development into the landscape and respecting the site's transitional role.
- 6.18 In terms of wider views, the below photographs were taken in the locations, and directions, shown in Figure 8. To confirm, the weather on the day the photographs were taken was dry, bright and clear with some intermittent cloud coverage.

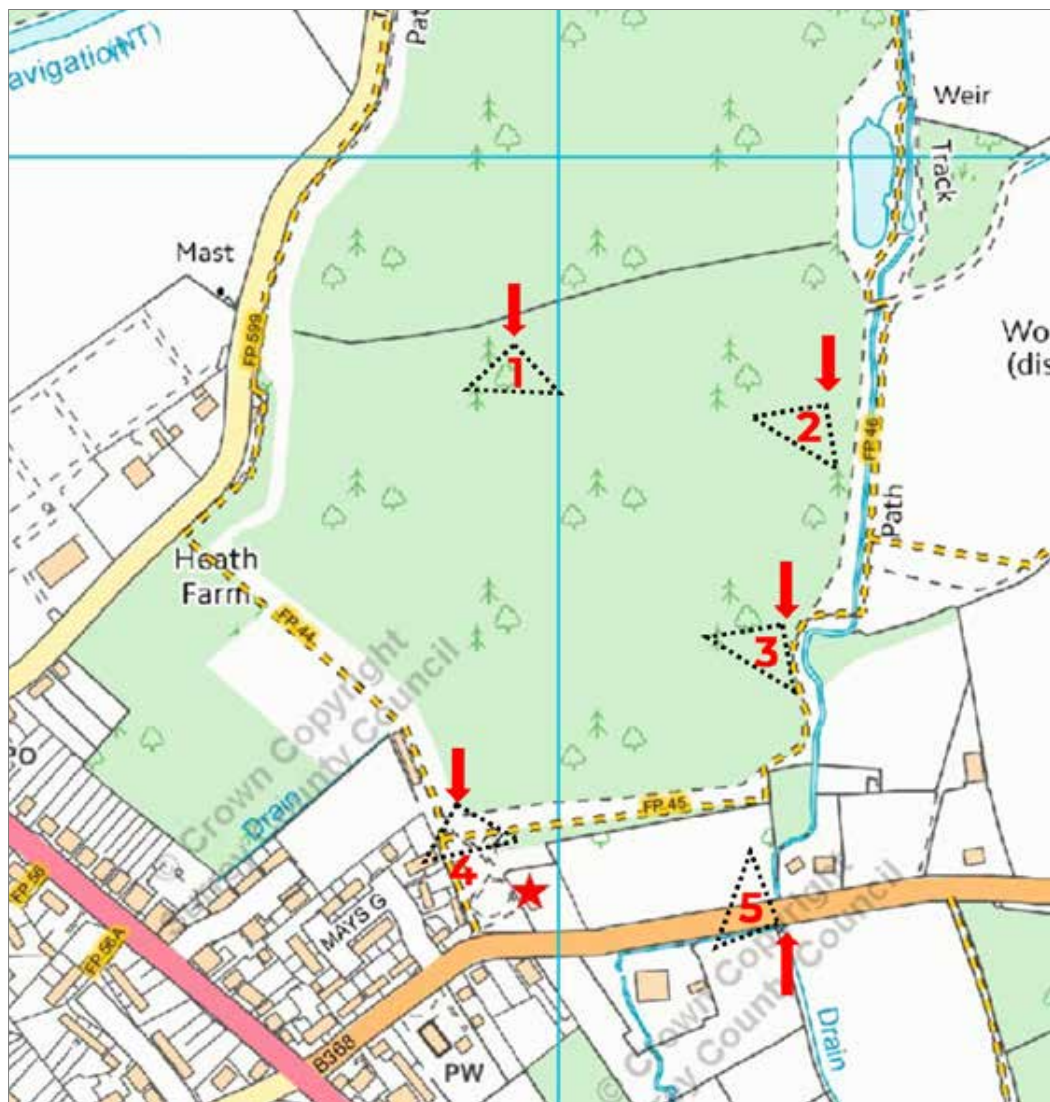


Figure 8 – application site (starred) & position & direction of photographs (source: Surrey Interactive)

- 6.19 The development that forms part of Maysfield Road and Mays Grove extend beyond the northern boundary of the site and along the entire western boundary.
- 6.20 Their visibility in wider landscape views is illustrated in Figure 9, below (photograph 3) which clearly shows the properties between breaks in field boundary screening and the application site screened from view by the same screening.



Figure 9 – photograph 3 looking southwest

- 6.21 The properties to the southern side of the Send Marsh Road are also clearly visible in wider landscape views, with this illustrated in Figure 10 (photograph 1), below.



Figure 10 – photograph 1 looking south



Figure 11 – photograph 4 looking south with image of large outbuilding overlaid

- 6.22 The existing 1 ½ storey outbuilding that would be demolished as part of the development sits near to the western boundary of the site and due to it being set off the ground on brick piers (circa 500mm) and a large single storey building in terms of its dimensions (9m long and 4.6m wide with an overall height of 5.6m), it too is clearly visible in certain views from public vantage points.
- 6.23 Furthermore, the dwellings to the southern side of Send Marsh Road provide a backdrop to the site in views from the north and therefore in combination with the aforementioned barn building within the site there is a clear perception of development that impacts on the openness and the visual character of the area.



Figure 12 – photograph 5 looking west

- 6.24 In terms of views from the public highway to the south of the site, as demonstrate in Figure 12, above (photograph 5) existing, mature screening to the rear of the application site and delineating the highway boundary (and with only limited gaps in coverage) would prevent any views from the highway when approaching Send.
- 6.25 Whilst views would be possible when directly adjacent to the entrance of the site, this would principally be of the shallow 1 ½ storey building in the context of development to the west that also has a lower overall height and single storey eaves, with a 15m gap between this building and the single bungalow to the east that would provide significant space between built form and open views to the countryside beyond.
- 6.26 The proposed detached bungalow is a squat, low slung building with fully hipped gable roof that would sit adjacent to the donor dwelling and, importantly, would not project any further to the east than the building as a whole, as demonstrated I Figure X below.

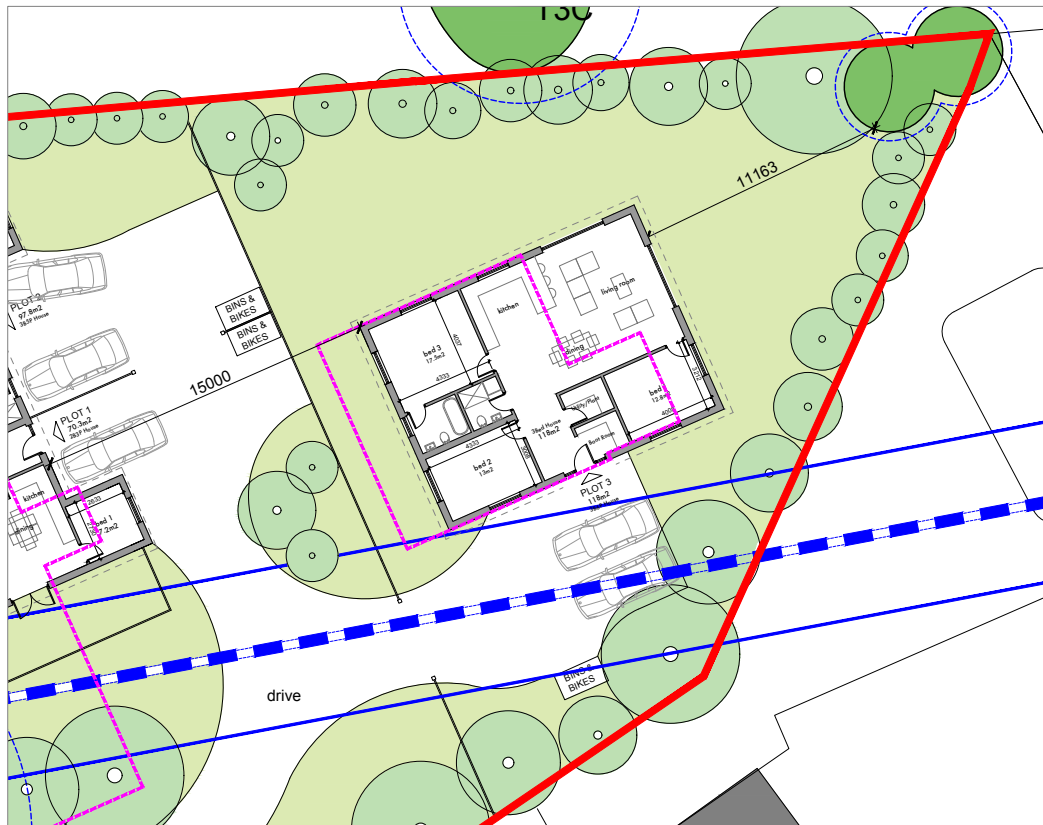


Figure 13 – Extract of proposed site plan showing Plot 3 location

- 6.27 In addition, the proposed landscape enhancements to the rear northern and side eastern boundary would further support the screening already provided beyond and within the site, with this limiting views from the east, as demonstrated in photographs 2 & 3.
- 6.28 Given the previously developed nature of the site and fact that development would project no further than development to the west or east, the proposal would not appear as significant, unrestricted urban sprawl or encroachment of development into the countryside.
- 6.29 Whilst it is accepted that there would be a net increase in built form as part of the proposal, the uplift is limited and considered in terms of its location. Therefore, despite there being an impact on the openness of the Green Belt as part of the development, this impact would be moderate and therefore not amount to substantial harm.
- 6.30 The proposal therefore does not constitute inappropriate development in the GB under the second limb of paragraph 145(g) of the Framework and accords with Policy P2 of the Local Plan.

LOCATION

- 6.31 Firstly, the site is not isolated and as such paragraph 79 of the Framework does not apply.
- 6.32 Paragraph 78 of the Framework promotes sustainable development in rural areas where it will enhance or maintain the vitality of rural communities. In relation to economic and community benefits associated with the development, and subject to future residents being able to sustainably access the services, amenities and facilities afforded in the area, the proposed housing would provide a boost to the local economy and businesses which would help to sustain services within the village.
- 6.33 Pedestrian and vehicular access would be accommodated as part of the shared private drive arrangement, with such an approach compliant in highway terms given the scale of the development proposed.
- 6.34 Pedestrian access from the site would connect with the footway to the front of the site that would connect the site with Send and Send Marsh.
- 6.35 Send is defined by the Council's Settlement Hierarchy as a large village (rural local centre) that contains a number of key community services, amenities and facilities, including a primary school (circa 300m from the site), health centre (circa 600m from the site), convenience store (circa 1,400m from the site), and recreation ground (circa 480m from the site).
- 6.36 The number 462/463 bus stops 170m away from the site on the A287 ('Mays Corner') and links the site to Guildford and Woking with an hourly bus services (Monday to Saturday).
- 6.37 From these main centres strategic rail connectivity to London can be found, along with a broad range of employment opportunities, services, amenities and facilities, with Woking specifically offering the nearest supermarket to the site (3.0 miles) and railway connectivity (2.9 miles), both of which are accessible on foot or bicycle (circa 17 minutes) via a well-lit highway / pedestrian footway from the frontage of the site.
- 6.38 The proposed development would reduce the reliance of future residents on private vehicles to obtain their day-to-day goods and services, as supported by paragraph 122 of the Framework, and promote opportunities for walking, cycling and the use of public transport (sustainable transport modes), as encouraged by paragraph 102 of the NPPF.
- 6.39 The site is therefore considered to be suitably located for residential development.

HOUSING NEED

- 6.40 Paragraph 59 of the Framework sets out 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 and that the needs of groups with specific housing requirements are addressed.

- 6.41 As already set out, paragraph 68 also supports the development of small and medium sized sites, with criterion (c) confirming that LPA should *support the development of windfall sites through planning decisions*; and criterion (d) of paragraph 118 promotes *the development of under utilised land where it would help to meet identified needs for housing where land supply is constrained*.
- 6.42 The West Surrey Strategic Housing Market Assessment: Guildford Addendum Report 2017 (SHMA) identifies a need for 12,426 homes in Guildford Borough between 2015 – 2034 (654 pa).
- 6.43 Policy S2 of the LPSS confirms an annualised housing need of 562 dwellings per annum over the plan period (total of 10,678), with windfall sites accounting for 750 homes within the total housing supply.

AFFORDABLE HOUSING

- 6.44 The NPPF at paragraph 63 confirms, that affordable housing should not be sought for residential developments that are not major developments, with the glossary of the NPPF confirming that major development constitutes 10 or more homes or sites with an area of 0.5 hectares or more.
- 6.45 Criterion 2 of Policy H2 of the Local Plan is largely based on the pre 2019 NPPF and wherein the Council will seek affordable homes on sites providing 11 or more homes (gross), or where dwellings would have a combined gross floor internal floorspace of more than 1,000 square meters.
- 6.46 Criterion 3 of Policy H2 goes onto confirm, that:
- In Designated Rural Areas, the threshold where we will seek an affordable housing contribution of at least 40% of the homes on these sites will be on sites providing more than 5 dwellings. For developments of between 6 and 10 dwellings inclusive (gross), a financial contribution in lieu of on-site provision of affordable housing will be sought which is of broadly equivalent value relative to on-site provision.*
- 6.47 With reference to s.157(1) of the Housing Act 1985, the site is not within an AONB or National Park and it is not one of the parishes detailed by the supporting paragraph of Policy H2 (4.2.36).

- 6.48 The SHMA provides an updated assessment on affordable housing need and confirms that per annum 517 households in the Borough require financial support to meet their housing needs.
- 6.49 Following the considerations of Mr Justice Dove in *Kings Lynn & West Norfolk v Elm Park Holdings*, paragraph 5.28 sets out that *the scale of affordable housing need is such that it does provide a clear basis for considering an upward adjustment to the assessed housing need relative to those based on the demographic-led projections.*
- 6.50 Paragraph 8.13 confirms, that there is *longer-term house price growth in the Borough which has been above regional / national averages; and that land values point to a shortage of residential land in the Borough.*
- 6.51 Paragraph 8.14 ultimately goes on to state that *the evidence conclusively supports an upward adjustment to improve affordability, taking account of the market signals and affordable housing needs evidence.*
- 6.52 In terms of the delivery of housing historically, the Council's Authority Monitoring Report for 01.04.2018 - 31.03.2019 (AMR) records affordable housing completions and confirms at paragraph 3.18 that the number of affordable homes delivered during the monitoring period is significantly below the annual affordable housing need figure set out as part of the SHMA, with this indeed the case since at least 2010.
- 6.53 The Council's Rural Economy Strategy (2017 - 2022) (RES) has identified affordable housing and sustainable communities as its top policy priority. Specifically, the strategy identifies the importance of enabling affordable housing delivery in rural locations and the role this plays in safeguarding their long terms sustainability. Finally, it confirms that the affordable housing need must be met locally and thus further supporting the current proposal and the delivery of 2 intermediate affordable homes.
- 6.54 As part of the previous application officers advised that the Council has an up to date local plan which accounts for the required level of affordable housing across the borough over the plan period. Given the above confirmation provided by the AMR of the historic and significant undersupply, and support provided by the RES, this position would appear to be somewhat undermined.
- 6.55 Paragraph 145(g) does not specify a level of affordable housing provision, and as set out Policy H2 is not engaged and therefore its requirement for 40% of units to be affordable does not apply. It is therefore contended that a 33% affordable housing contribution is both reasonable and justified given the number of units proposed.
- 6.56 The applicant confirms their agreement to enter into a suitably worded s.106 UU to secure the proposed intermediate affordable housing provision.

- 6.57 Finally, a Registered Social Landlord ('Landspeed Homes Limited') known to GBC are to acquire the affordable housing unit. Given the size of the proposal and this confirmation the development can be delivered quickly and therefore start to meet the identified housing need.
- 6.58 In summary, there is clear and unmet affordable housing need in the Borough and the proposal would therefore go some way in meeting that identified need in a timely manner, in line with paragraph 145 (g) of the Framework.
- 6.59 On the basis that the proposal would meet an affordable housing need and Policy H2 and the 40% requirement does not apply, it is contended that a 33% affordable housing contribution is a significant material consideration in favour of the current application.

HOUSING MIX

- 6.60 Policy H1 of the LPSS requires *new residential development to meet a range of accommodation needs as set out in the latest SHMA. New development should provide a range of housing tenures, types and sizes appropriate to the site size, characteristics and location.*
- 6.61 The 2015 SHMA at paragraph 8.13 confirms, that *the data suggests in the period between 2013 and 2033 that around three-quarters of the requirement is for homes with one- or two-bedrooms with around a quarter of the requirement being for larger homes with three or more bedrooms.*
- 6.62 With regard to open market housing, paragraph 8.26 sets out that *the data suggest a requirement for homes for 18,111 additional households with the majority of these being two and three bedroom homes.*
- 6.63 Given the number of units it would not possible to wholly comply with the requirements of the SHAM. However, the development would nevertheless make a meaningful contribution to the delivery of smaller dwellings, noting also that Send, as confirmed as part of the SNP, has an identified shortfall of flats when compared to the rest of the Borough (7.0% compared to 19.3%).
- 6.64 Ultimately, Policy H1 provides sufficient flexibility for housing mix on individual sites for this ground not to be reason for refusing to grant permission.

CHARACTER & APPEARANCE

- 6.65 Paragraph 124 of the Framework makes clear, that the creation of high quality buildings and places is fundamental to the planning process, with good design a key aspect of sustainable development.
- 6.66 Paragraph 127 sets out that planning decision should ensure development function well and add to the overall quality of the area; are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; are sympathetic to the local character whilst not preventing or discouraging appropriate innovation or change, such as increased densities; and, optimise the potential of sites to accommodate and sustain an appropriate mix of development.
- 6.67 Saved Policy D1(4) states, that all new development will be designed to reflect the distinct local character or the area and will respond and reinforce locally distinctive patterns of development, including landscape setting.
- 6.68 The units are domestic in scale and appearance and respond to the architectural vocabulary of the area and the Surrey vernacular, with brick plinth details, splayed brick lintel details, exposed rafter feet, horizontal window alignment, classic elevation to roof proportions, a steeply pitched roof (1 ½ story building) and pitched roofed porches with bargeboard detail.
- 6.69 The number and height of the units has been significantly reduced as part of the current application, with a clear tapering in the scale of built form from west to east to respect the site's transitional role and ensure a greater sense of space and views through the site as part of the development.
- 6.70 In terms of arboriculture, there are no TPO on the site or off site that would be affected by the development, or trees within the development site. Reason for refusal 6 has therefore been overcome.
- 6.71 Landscape enhancements are proposed to the rear northern and side eastern boundary, with native, species-rich landscaping proposed (controlled by condition). Such landscaping would support the site's transitional role, reinforce existing field boundary treatment and knit the built form into the established landscape, as required by saved Policy D1(7).

RESIDENTIAL AMENITY

- 6.72 The proposal not appear overly dominant or overshadow, it would not result in a loss of light or sunlight, and there would be no material loss of privacy or overlooking, including perceived, as part of the development.

ACCESS & PARKING

- 6.73 It is firstly confirmed that the landowner retains the necessary rights to be able to access the site from the public highway in the south, with adequate visibility splays, given the speed of the road, also achievable in perpetuity from this existing, lawful access point.
- 6.74 With regards to pedestrian access and noting the requirement of Policy ID3 of the Local Plan, this can be accommodated within a shared private drive arrangement that would accommodate vehicles and pedestrians, with such an approach policy compliant given the scale of development proposed.
- 6.75 With reference to the stand-alone technical note from Bellamy Roberts Highway Transportation and Infrastructure Consultants, the proposed bin collection point, for the reasons set out by the applicant's appointed technical expert, is appropriate and thus would not warrant refusal on this ground.
- 6.76 In terms of parking standards, these are set out within Guildford Borough Council's (2006) Vehicular Parking Standards and Surrey County Council's Vehicular and Cycle Parking Guidance (2018). The GBC parking standards are a relatively blunt instrument compared with those from SCC, which granulates requirements based on 2 bed houses.
- 6.77 Based on the mix proposed, plot 1 would be allocated a single space and plot 2 & 3 would be allocated two spaces each which is considered to be justified in highway and visual amenity terms.
- 6.78 A single bicycle parking space for each unit would be provided in the individual detached, secure cycle storage structures, as shown on the submitted site plan.
- 6.79 Furthermore, each parking space would be provided with a fast charging socket.

THAMES BASIN HEATH SPA

- 6.80 In order for the development to be acceptable in planning terms, comply with the Conservation of Habitats and Species Regulations 2017 and avoid a likely significant effect upon the conservation interests of the Thames Basin Heaths SPA, a s.106 agreement, in line with the Guildford Borough Council Thames Basin Heaths Special Protection Area (TBH SPA) Avoidance Strategy SPD (2017) and NRM6 of the South East Plan (2009), will be provided to officers to secure the necessary financial contribution.
- 6.81 With an executed engrossment in place the development would suitably mitigate for its impact on the conservation interests of the SPA. Again, the applicant confirms their willingness to enter into a suitably worded s.106 UU to secure.

ECOLOGY

- 6.82 The site does not form part of a SAC, SNCI or SSSI and is not within 200m of ancient woodland or a meaningful body of water.
- 6.83 Combined with the land being formally maintained as garden and the detached outbuilding being a single skin building with no voids, a preliminary ecology assessment (PEA) is not required to support the current application.
- 6.84 The proposal would not, therefore, harm any protected species or denude the ecological value of the site.
- 6.85 Policy ID4 sets out the Council's approach to green and blue infrastructure, and wherein the policy seeks the maintenance, conservation and enhancements of biodiversity.
- 6.86 The inclusion of native species rich landscaping and bat and bird boxes as part of the development would support and encourage biodiversity in the area and therefore result in a net gain as part of the development.

7. CONCLUSION

- 7.1 The current application has been developed having regard to the relevant guidance of the NPPF, policies of the Development Plan, adopted guidance of the Council, and the characteristics of the site and the form, design and scale of local development.
- 7.2 Following granting the planning consent for the previous application, the current scheme is a reduction in built form and therefore its impact on green belt.
- 7.3 The site is not within the defined settlement, it is different in character to this area and the land is formally maintained as garden. It is therefore strongly contended that the site represents PDL.
- 7.4 The proposal would not appear as significant, unrestricted urban sprawl or encroachment into the countryside. Whilst it would impact on openness, the impact would not amount to substantial harm. The proposal does not, therefore, constitute inappropriate development in the GB.
- 7.5 The proposal represents a sustainable form of development that would optimise the use of land in meeting an identified housing need and could be delivered quickly. Significant weight should therefore be attributed to the provision of affordable housing as part of the development.
- 7.6 The economic and community benefits associated with the development would provide a boost to the local economy and businesses which would help to sustain services within the village.
- 7.7 A character appraisal of the area and understanding of the Surrey vernacular has directly informed the design and appearance of the development.
- 7.8 The proposed development would reduce the reliance of future residents on private vehicles and promote opportunities for walking, cycling and the use of public transport.
- 7.9 The proposal would not demonstrably harm the amenity of neighbouring occupiers and future occupiers would be afforded an appropriate level of amenity as part of the development.
- 7.10 The development would not harm protected species and the proposal would result in a net gain in biodiversity.
- 7.11 Adequate off street-car accommodation would be provided as part of the development, with suitable, secure storage for bicycles also provided.

- 7.12 In highway safety terms, the proposal would not increase movements to a point that could potentially impact on highway capacity, adequate visibility splays would be provided and retained in perpetuity in both directions and servicing the site for refuse purposes is now acceptable.
- 7.13 The development therefore accords with the local and national policy and guidance and as such express planning consent should be granted.