

# **NORMANDY PARISH COUNCIL**

## **LOCAL PLAN CONSULTATION**

### **Appendix 3**

#### **Normandy's position in the Green Belt**

The National Planning Policy Framework states quite clearly that the Government's fundamental aim of Green Belt Policy is to prevent "urban sprawl" by keeping land permanently open. It states that construction of new buildings should be regarded as inappropriate for Green Belt.

It is accepted that it is for Local Authorities in this case, Guildford Borough Council, to define and maintain Green Belt land in their local areas and that as part of that process the boundaries can be altered as part of the Local Plan Review Process.

Normandy Parish Council is concerned that in publishing their evidence base Guildford Borough Council has overlooked one of the primary purposes of the Green Belt in making their assessment of the areas within the borough that presently have Green Belt status.

The Borough Council are reminded that the Green Belt serves five purposes as below:-

1. To check the unrestricted sprawl of large built up areas.
2. To prevent neighbouring towns merging into each other.
3. To assist in safeguarding the countryside from encroachment.
4. To preserve the setting and special character of historic towns.
5. To assist in urban regeneration ***by encouraging the recycling of derelict and other urban land.***

The assessment document published by Guildford Borough Council to support the idea that Normandy should be removed from its Green Belt Status fails to take account of the primary purpose of the Green Belt and in the Parish Council's view places undue emphasis on features that are more relevant to suburbia.

In the view of Normandy Parish Council all five of the purposes of the Green Belt are met by Normandy and Flexford as the description in the introduction part of this report shows. The Parish Council considers that it remains **the most effective buffer** that Guildford Borough has against the sprawl of Aldershot that has spread into Ash and also seeks to spread into Tongham. It

also provides a buffer against the sprawl of Farnborough and the urbanisation of the land through which the A331 /Blackwater Valley Relief Road runs.

Normandy Parish Council considers that the policy in the **NPPF under Section 9 paragraph 79** presents the argument of the Parish Council against the evidence base that the Borough Council has presented i.e.

*“The Government attaches great importance to Green Belts. The fundamental aim of the Green Belt Policy is to prevent urban sprawl by keeping land **permanently** open; the essential characteristics of Green Belts are their openness **and their permanence**”.*

The NPPF then goes on to warn against creating more Green Belt.

Normandy Parish Council considers that the Green Belt areas surrounding the settlements should be retained and reinforced.

Normandy Parish Council has no objection to the settlement areas being being in-filled in sensitive manner .

**However it would appear that the evidence based information has started from a point of adjustment/manipulation to the settlement boundaries already by e.g. at North Wyke Farm where the settlement boundary has been extended across the highway solely for the purpose of including farm buildings which have been built on Green Belt Land (site 2007;H16 D)**

**It is noted that these adjustments/manipulation have taken place at the site of every piece of available land identified by the SHLAA (Issues ad Options para 9.18 and 9.19)**

**In the case of Site 48 (J16A) the proposed development site consists of 2 open fields which in fact are separated from the settlement boundary by two other open fields which are not mentioned as available for development. Despite this the settlement boundary has been shown as having been extended around those 2 fields so that it can be seen to be adjacent to the site you propose should be developed**

It follows that Normandy PC rejects the settlement boundary as drawn in these documents.

#### **The nature of the development of the settlements within the Green Belt in Normandy Parish Council area.**

As indicated in the introductory paragraphs in the main paper, Normandy Parish Council is in effect five hamlets or settlements which are partly connected by ribbon development. This in particular can be said about Glaziers Lane but cannot be said about Westwood Lane nor can it be said about the A323. If one looks at the hamlet of Normandy, the development consists of ribbon development to the front and rear of which lies Green Belt land.

There are no groups of houses that are enclosed in a manner which can in any way be described as a village and there are no facilities available to it apart from the primary school and the shop in Normandy which is a specialised music supplier, the doctor's surgery which again is commented upon and public transport by way of the no 20 bus service. These properties are all of medium density. It has access to the 2 open recreational areas situated in the area but not much else

With regard to Flexford, again Normandy Parish Council is of the view that Flexford cannot qualify as a village and yet the issues and options strategy refers on page 61 to a village which has a "good range of services". There are none apart from the infrequent 520 bus and the station which we say scores far too highly when compared against others within the same document. Even if these settlements are somehow taken together their sum does not amount to a definition of a village

### **National Planning Practice Guidance**

**Paragraph 79** reminds us the Government attaches great importance to Green Belts and the fundamental aim which is reproduced earlier in this document.

**Paragraph 81** reminds us that having identified Green Belt land local planning authorities should seek to enhance the beneficial use of it provide access leisure facilities and the like. Guildford Borough Council have worked in partnership with Normandy Parish Council to achieve this. Considerable monies have been invested in this in Normandy and the Parish Council has and continues to seek to improve access to the green belt land in which it is set

**Paragraph 83** reminds us that once set Green Belt Boundaries should only be altered in exceptional circumstances through the Local Plan process. The Parish Council can see no merit in making sizeable alterations to the existing boundaries which are presently complete and sufficient

### **Paragraph 84**

This provides that when drawing up or reviewing Green Belt boundaries Local Planning Authorities should take account of the *need to promote sustainable plans of development*. They should consider the consequences for sustainable development of *channelling development **towards urban areas*** inside the Green Belt boundary towards towns and villages inset within the Green Belt or **towards** locations beyond the outer Green Belt boundary.

**Note that** : The proposed 'sustainable' development within Normandy itself is not assisted by the Borough Council's document which plans no additional services for Normandy whatsoever and as such given the materials with which the Borough Council has to work i.e. essentially scattered hamlets within Green Belt land without effective services, it is difficult to see how an argument for sustainable development can be met even with the expansion proposed within the Normandy administration area. If the Borough Council's argument is that Normandy should expand as part of a feeder to the towns

own sustainable development then this would fail to meet the requirement that the Borough should devise transport policies that seek to maximise use of sustainable transport to minimise the increase in noxious fumes resulting from additional road traffic. The Borough Council does not have control of British Rail nor the road network which are operated by the Highways Authority and the County. The Parish Council is aware of plans to build a new rail station at Park Barn but this would not take much traffic off the road from the Parish Council's perspective.

The Parish Council have endeavoured to attract Tesco and the like to take over the sites formerly at Westwood Stores and lately the Duke of Normandy. There is no interest and there is unlikely to be any interest even on the basis of this expansion proposal.

Normandy Parish Council are of the view that it is wrong for the Borough Council to focus provision of housing in Normandy in the manner suggested given this situation. In reality the proposals are that there should be a 50% increase in the number of houses scattered across the five settlements in the Normandy Parish Council area and then an increase of a further 100% after 2031. If one considers the proposals within the paper as a whole for the Guildford Borough area, apart from the proposals for the development at Burpham and Shalford, Normandy has been identified for taking proportionately more proposed properties than any other ward in the Green Belt, most of which are larger and could accommodate the idea of sensitive infilling better and with more ease.

**Paragraph 54** of the National Planning Policy Framework requires the Borough Council to consult with neighbouring authorities and in particular Normandy Parish Council points to Rushmoor where a further 1000 houses have been built in the last two years and, less than two miles from our boundary. They are also to build on the Army camp another 4000 houses with full amenities.

Normandy Parish Council has not been made aware of any consultation between Guildford Borough and Rushmoor on this topic. The Borough Council has recently given planning permission for the development of 400 properties at South Lane in Ash and even more are to be built. Again there has been no consultation with Normandy Parish Council over the extent of this development and although there is no obligation to do so, as Normandy Parish Council is not a Planning Authority, the implications for Normandy are important because the land borders the Parish Council boundary. It is understood that there will be substantial further development in that area in the coming years.

In previous local plans the Green Belt at Normandy was proposed and reinforced as being capable of being **kept for all time** and, because of the very important role that it serves as a buffer between Aldershot and Guildford, the development in Rushmoor and at Ash reinforce that point entirely in the Parish Council's view. The need for housing provision across the Borough does not of itself amount to the exceptional circumstances envisaged in the Guidance indeed the recent planning permission given to 400 houses along

the parish boundary at South Lane Ash shows us all the more how important it is that the five hamlets should remain 'washed over' by the green belt

### **The affect of these plans upon Normandy Parish Council administrative area**

All 8 of the proposed sites presently have full Green Belt protection as they are outside of the settlement area but these changes will make it much easier for developers to get planning permission. These sites are proposed to have a maximum number of houses i.e. high density development but with no amenities.

Although the National Planning Policy Framework at **paragraph 89** makes it clear that development can take place in the green belt under exceptional conditions and these include

- 1 .provision of appropriate facilities for outdoor sport (no more provision is needed I Normandy which is well served by their sites at Manor Fruit Farm and Normandy Common
2. the replacement of a building provided the building is of the same use and not *materially larger*
3. *limited* infilling and limited affordable housing
- 4 limited infilling or the partial or complete redevelopment of previously developed sites which would not have a greater impact on openness

..... the Parish Council is of the view that  
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there are sufficient brown field sites within the town to support the housing numbers proposed ,

**and that any** change to the green belt surrounding Guildford Town area would be inappropriate in those circumstances