

The Guildford Brough Council Green Belt Assessment: The NAG Perspective

Summary conclusion:

The recently published Green Belt Assessment (GBA) from Guildford Borough Council makes for worrying reading if you believe that the Green Belt serves important purposes and should therefore have extra protection from development.

Of the 575 parcels of Green Belt land assessed by GBA, 96% of them (551 parcels, circa 80% by area of the GBC Green Belt) will almost certainly be considered Grey Belt once the expected new NPPF rules come in this year (which will remove 'Footnote 7' i.e. landscape, habitat, heritage and some flooding protections). So circa 80% of GBC Green Belt land is deemed not to serve a strong enough purpose to warrant extra Green Belt protection, as shown in the map below:

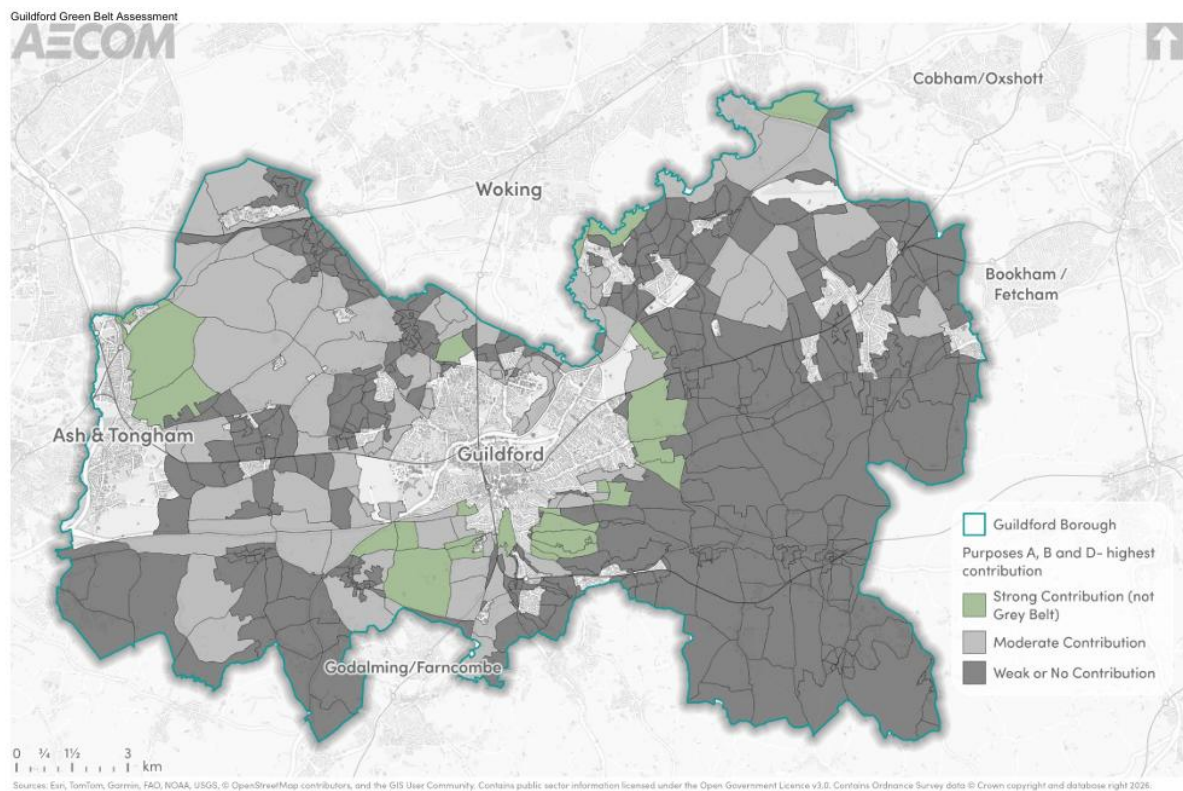


Figure 3-6 Map of overall purposes A, B and D highest contribution assessment findings

Implications:

This Assessment is worrying for two key reasons; one short term, one longer term.

The light and dark grey parcels land on the map above are potential targets for speculative development before the new local plan is agreed. We've already seen those speculative development applications locally (think Shortlands Farm, and Taylor Wimpey's Poyle Road, Tongham, and Normandy applications). We have no doubt more will come forward, in our community and more widely across the borough.

Between now and the adoption of the new Guildford Local Plan, any land subject to those applications will have to rely on factors other than their Green Belt contribution: essentially only if a site is deemed to not meet the 'Golden Rules' and/or not be a sustainable location would there be grounds for the application's refusal. The weakness of this GBA is that it assesses relatively small plots in isolation; it does not assess the contribution of a large site such as Taylor Wimpey's to purpose B of the Green Belt (to prevent neighbouring towns merging into one another).

The new Guildford Local Plan is not expected to be in place until 2029 – the short term worry is that it is open season for developers until then!!

The adoption of a new Local Plan will eventually give more protection against this type of speculative development (but too late to save Shortlands, Poyle Road, and Flexford sites if outline permission is granted in the meantime) because, so long as enough houses are being built to meet government housing targets, GBC (or West Surrey and South Middlesex Council by then) can specify where development should take place.

The National Planning Policy Framework states that if Green Belt land needs to be released for development - which undoubtedly will be the case if the housing target is to be delivered - priority should be given to 1. previously developed land 2. Grey Belt which is not previously developed and then 3. other Green Belt locations.

You can see the longer-term worry: with so much undeveloped Grey Belt in GBC, where will development in the Green Belt take place in future? Around every village? Around every railway station? How will the Green Belt boundaries change (i.e. shrink) to take Grey Belt land out of the Green Belt to make it easier to develop on that land? Full public participation in this next Local Plan process is critical – to make our views heard, to ensure transparency in the process, to hold local politicians and planners to account.

Calls to action:

Further reading: If you want more detail on the GBA, follow this link: [Green Belt Assessment 2026 - Guildford Borough Council](https://www.guildford.gov.uk/media/37901/Guildford-Green-Belt-Assessment-FAQs/pdf/4._Guildford_Green_Belt_Assessment_FAQs.pdf?m=1785240729130). The Q&A is a good starting point: (https://www.guildford.gov.uk/media/37901/Guildford-Green-Belt-Assessment-FAQs/pdf/4._Guildford_Green_Belt_Assessment_FAQs.pdf?m=1785240729130)

Contact NAG: Whilst we believe that GBC has acted in good faith in creating the GBA (i.e. they are applying the NPPF), the GBA is a desk exercise and so naturally there will be mistakes or inconsistencies in the treatment of similar parcels of land. Let us know if you see such instances; we don't think that corrections will change the final Grey Belt assessment on parcels, but NAG will aggregate issues and ask for GBC to update the GBA if necessary.

Contact your MP: The Grey Belt definition is not fit for purpose – it has unintended consequences far beyond 'the low-quality land, including previously developed land,

within green-belt boundaries', the release of which was the primary focus of this policy change. This is not the outcome in Guildford Borough, where 96% of Green Belt assessments conclude the land will be considered Grey Belt under the draft NPPF. As a result, there is haphazard planning in the short term, and long term the Grey Belt definition fundamentally undermines the purposes of the Green Belt across the local plan area as a whole. Ask your MP to petition ministers to reconsider the definition of Grey Belt, and to retain Footnote 7 protections before the draft NPPF is released.

See evidence to the House of Lords Built Environment Committee on the Grey Belt (committees.parliament.uk/oralevidence/15180/pdf/) by Matthew Pennycook MP, Minister of State for Housing and Planning on 18th December 2024; reality is not living up to government intentions:

Lord Bailey of Paddington: *Earlier, you said that this policy is strategic to avoid “haphazard” development. Is not the very nature of a locally driven policy suite haphazard, in and of itself, if only because the constraints are so very different in many parts of the country?*

Matthew Pennycook MP: *I would not accept that. As Will just alluded to, we are allowing grey-belt release through two routes. The first is through the decision-making route, whereby if a local authority does not have an up-to-date plan, if it is subject to the presumption, Grey Belt can be released through decision-making, but not land of higher quality, so no greenfield land will be released through that decision-making route.*

When it comes to plan-making, it will be for local authorities to put out a call for sites, to develop their plan, to undertake a green-belt review as part of that plan-making process, and to look at whether they can meet their assessed housing needs through brownfield alone by densifying brownfield, by co-operation with neighbouring authorities, and through the new strategic planning mechanisms that we intend to introduce through legislation. Where they cannot do that, they can, through this sequential approach, look strategically at which are the most sustainable and appropriate sites to release from the Green Belt with Grey Belt prioritised.

That is a smarter and more strategic approach than the existing system in which, in exceptional circumstances, parcels of land are haphazardly released as and when.

Contact your GBC councillors: The outcome of the GBA leaves communities open to the risks of speculative development until the adoption of the new Guildford Local Plan in 2029. How will GBC prevent 'haphazard' development in the meantime? Ask them why none of the Green Belt land between Ash/Tongham and Guildford is considered to prevent the towns merging into one another? How will they assess a large site such as

Taylor Wimpey's - surely its contribution needs to be looked at in the round? How many parcels of parcel of land need to be built on before GBC assesses that enough is enough in between Ash/Tongham and Guildford, or before the purposes of the Green Belt across the local plan area as a whole has been fundamentally undermined by the cumulative number of speculative planning requests approved?

Update your planning objection: Please see the article on our website with suggested headline points in response to Taylor Wimpey's resubmitted application. Your updated objections can be made up of Sustainability or Grey Belt points, or both - whichever you feel comfortable writing, and whatever brings new information to the attention of planners. If you would rather stay out of the weeds of the Grey Belt debate and focus instead on the sustainability issues, you may be assured that we will cover the former in our own submission.