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Attention of: Victoria Bates
Planning and Regeneration Dept
Guildford Borough Council
Millmead
Guildford GU2 4BB

20th June 2025

Dear Ms Bates

Reference 25/P/00751

Location: Blakes Lane Farm, Blakes Lane, East Clandon, Guildford, GU4 7RR

Proposal: Outline application with all matters reserved for the construction of up to 5 self-build dwellings.

East Clandon Parish Council wish to formally **OBJECT** to the above application. This objection is for the following reasons:-

1. Green Belt / Grey Belt

- The proposed development site lies within the green belt, a designated Area of Great Landscape Value (AGLV) and is in 200-400 metres of the Surrey Hills National Landscape (Previously the AONB).

Additionally National England (the government body that administers the National Parks and Landscapes) have proposed, consulted and approved to extend the Surrey Hills National Landscape to cover this site and far beyond. While not yet adopted, the proposed extension recognises the site's **high scenic and ecological value**, and planning decisions should **not pre-empt** the outcome of that decision. Permitting residential development now would be premature and risk **prejudicing Natural England's designation process**, potentially **undermining the statutory purpose of the National Landscape**.

This in itself refutes the claim that the site is Green Belt rather than Grey Belt for the following reasons

- Policy **P1 of the Guildford Local Plan** requires that development must conserve and enhance the special landscape qualities of these protected areas.
- Even if the site is not currently within the AONB boundary, the **setting of an AONB is protected under national planning guidance**,

***Para 189 of the NPPF states Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks).** And*

Para 190 states When considering applications for development within National Parks, the Broads and National Landscapes, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest.

Which emphasises that development must **avoid or minimise adverse impacts** on the landscape,

especially when that landscape has been reviewed and designated suitable for inclusion into a National Landscape – why jeopardise our heritage assets?

- The **cumulative impact of development creep near the National Landscape boundary** would set a dangerous precedent and diminish the integrity of the landscape.
- The applicant's assertion that the proposal *enhances* the landscape is questionable: self-build housing—by its very nature—may lead to fragmented design, greater hardstanding, light pollution, and domestic boundary treatments inconsistent with rural character.
- Section 11 of the current NPPF (The presumption in favour of sustainable development) states *"...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 this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed"*
The assets of particular importance are clearly defined in Footnote 7 which individually lists specially protected assets including Green Belt & National Landscapes.
- The site is **currently in agricultural use** and has **no history of built development**. It does **not constitute previously developed land** under the definition in Annex 2 of the NPPF.

2. Harm to Openness, Landscape Character, and Rural Tranquillity, Policy Conflict

As we have demonstrated that the site is Green rather than grey belt, we can continue

- The proposal would introduce **new, dispersed housing and infrastructure** in an otherwise open, tranquil, and undeveloped countryside setting.
- The **impact on openness would be significant**, contrary to the fundamental aim of the Green Belt: to **keep land permanently open**.
- The site forms part of the **landscape character of the Surrey Hills fringe**, which is typified by open fields, hedgerows, and long rural views. New housing would **erode this landscape pattern** irreversibly.
- The access, lighting, driveways, and increased traffic movements would further **urbanise** this rural landscape.
- Granting permission would create a **precedent for speculative Green Belt development** under the guise of self-build housing, especially when there is no fallback position of prior development.

3. Questionable Need for Self-Build Housing and Over Development of East Clandon

- We will allow Guildford Borough Council to deal with the applicants claims of legal irregularities in reporting the numbers on the self build register – but the published figures in the current **Authority Monitoring Report** which run to March 2024 **gives a surplus of 4 self-build plots over requirements**. This figure is not taking into account the quantity of self-build plots from some of the major developments that have already been given permission e.g **Blackwell Farm**: 35 plots, **Garlick's Arch**: 15 plots, **Gosden Hill Farm**: 45 plots, **Wisley Airfield**: 40 plots and various others.
- The Authority Monitoring Report also states *"Planning permission has also been granted outside this monitoring period but within the three- year time period for granting sufficient planning approvals"*
- As an anecdotal observation after some research – it seems that only 2 of the 5 allocated self-build plots of the newly developed Ada Gardens in East Horsley have had planning applications presented – maybe the planning department can confirm this - and if true it must show that there is no great requirement for these plots. (Maybe other developments could be looked at as well)
- There are 114 dwellings in East Clandon and in the recent past we have had planning approved for 6 new dwellings - (included in that figure) which already represents an increase of over 5%. We do

not feel another 5 dwellings representing another large increase is sustainable for this small rural community.

- The proposed site is located along a very narrow single track road. As statistics show, the occupants of any houses will have 2 or more cars per household. This is also unsustainable in this location.
- Looking at the wider area beyond East Clandon, **we have in excess of 5000 houses being built within approx. a 3 mile radius**. These include: Wisley – 2000, Garlick’s Arch – 550, Gosden Hill – 1800 and various others such as Horsley Railway Land, Alderton’s Farm, Bell & Colville site etc. and the most recent housing needs survey conducted by Surrey Community Action, concluded that there was no further housing need in East Clandon. The Parish Council feel there will be enough **pressure on the local road and infrastructure network** without adding more housing in what is a historical rural community.

4. **Biodiversity and Light Pollution**

The applicant is well versed in the complexities of Biodiversity and without professional assistance we would be unable to refute any of his claims regarding that.

However we are sceptical that a development of this scale will ever lead to greater Biodiversity than that offered by an undeveloped field.

Villagers have expressed **great concerns regarding the wildlife and general biodiversity** of not only the site, but the entire field also owned by the same developer. The light pollution alone would deter much wildlife on the edge of this National Landscape.

5. **Neighbourhood Plan Survey**

A recent survey, conducted as part of the development of a Neighbourhood Plan, showed a large majority of villagers said the **National Landscape and Green Belt mattered a great deal to them** and should be protected. The same survey indicated little appetite for further housing and open spaces were considerably more important.

6. Although not a planning consideration we feel the applicant is using the route of self-build housing is an attempt to ‘game’ the planning system and **set the principal of development** in this sensitive site. Should approval be considered we would ask for a condition that any plots not sold for self-build would be returned to the green belt after a reasonable period of time, 12 months for instance.

Thank you for time in reviewing these points and in light of the above, I respectfully request that **Guildford Borough Council refuse this application**. The **sensitive location in the National Landscape Setting**, absence of prior development, and emerging **National Landscape designation** all weigh heavily against approval. There are **no truly exceptional circumstances** to justify permanent harm to this protected landscape and Green Belt.

Yours sincerely



Linda Koszo
Clerk to East Clandon Parish Council
Sent on behalf of East Clandon Parish Council