

Guildford Borough Council

RESPONSE TO POINTS RAISED DURING ITEM 9: THE SPATIAL STRATEGY

Introduction

1. This paper responds to the numerous points that were raised by participants during the two hearing sessions held on 26 June on 'Item 9: the spatial strategy' which, due to time constraints, the Council did not have the opportunity to respond to verbally on the day.
2. It follows the same structure as ID/7 and, in line with the Inspector's instructions, does not seek to provide a comprehensive response to each matter raised. Instead, it provides a summary of the Council's position with appropriate cross-referencing to other documents, recognising that it has been produced under time constraint in order that it is available for 3rd July 2018. .

1. The overall approach to exceptional circumstances

Should the plan seek just to meet demographic need, rather than employment, students and unmet need in the housing market area, so as not to take up any Green Belt land? How can these "add-ons" give rise to exceptional circumstances justifying Green Belt release?

3. The Council's position on the existence of exceptional circumstances is summarised in its response to Question 8 of the Inspector's Initial Questions. The need for housing, including providing sufficient housing to meet employment trends, student need and unmet needs in the wider HMA, are capable of constituting exceptional circumstances.
4. The Council's position on employment-led needs was discussed in full in the first two weeks of the inquiry and that on students is summarised in its Note [GBC-LPSS-014]. The Council has determined to meet its full OAN for the reasons set out within its Housing Delivery Topic Paper and the Plan.
5. The Council has previously expressed considerable concern regarding the extent, if any, to which it should be required to meet unmet needs arising from the wider HMA given that this need would need to be accommodated on Green Belt sites. Only to the extent that the Inspector considers that the question as to the degree to which meeting the need from the wider HMA remains open following his expression of view in ID6, the Council maintains these concerns.

2. The overall balance of development

Won't the combination of the allocations along the A3 amount to major sprawl?

6. Due to the visual enclosure surrounding the allocations and the boundary of the A3, a strategic gap would be maintained.. Allocations A25 Gosden Hill Farm, A43 Garlick's Arch, and A58 Burnt Common Warehouse would be physically and visually separated by the curvature of the A3 highway, intervening landform, woodlands and hedgerows enclosing the sites. Furthermore, any development brought forward

would be expected to include boundary vegetation as a mitigation measure that would limit the potential cumulative effects of the proposed LP allocations.

7. Further the Council refers to the information provided by the developers of Gosden Hill Farm in response to this point, including on Wednesday 27th June as well as its own answers on that day. One of the modifications arising from this hearing session is the inclusion of an additional landscaping requirement to mitigate the visual impact of the development from the A3. Similar modifications will be sought in respect of A43 and A58.

Has the whole plan been built around strategic sites rather than sustainable ones?

8. The “whole plan” has been built around meeting Guildford’s assessed needs in full, as far as is consistent with the policies set out in the NPPF. As discussed at length elsewhere this will involve identifying new sites, which because of the extent of protected areas will involve incursion into the Green Belt.
9. The contrast upon which this question is predicated is, as raised in oral session, flawed. The Council strongly considers that a strategy that includes a small number of strategic mixed use sites is the most sustainable option for growth, as such sites are able to most meaningfully contribute towards meeting needs (including making a contribution to early delivery) and can provide a range of supporting infrastructure to ensure sustainable new communities.
10. The Council also considers that, of the potential strategic site options, the plan allocates the most sustainable of those. In relation to the Guildford urban extensions¹ – both are well located in relation to the urban area and offer significant opportunities for achieving meaningful and sustainable rail, bus and cycle links together with internalisation of trips.
11. The new settlement at Wisley² is also of a scale that can facilitate a range of measures to improve the sustainability of the site, which is composed of a significant proportion of PDL. This includes on-site facilities to increase internalisation of trips and sustainable transport measures including a regular bus service in perpetuity.
12. The alternative of allocating significantly more small sites would not enable a comparable increase in the mix of uses or supporting infrastructure. Further, consideration has to be given to sustainability at both a site specific level but also having regard to the overall impact of development. Those promoting other sites fail to have regard to the overall perspective.

Is there an imbalance of development, with too much to the east of Guildford?

13. The borough is constrained to the north by the SPA and the south by the Surrey Hills AONB. As a result development is focussed across the middle of the borough. The Council’s strategy is driven through the allocation of the most sustainable sites taking into account the spatial hierarchy³ rather than a notional proportionate approach. Having said that the Council considers that the spread of development is fairly evenly

¹ GBC-LPSS-SD-TP-004 para 4.124 – 4.135

² GBC-LPSS-SD-TP-004 para 4.145 – 4.151

³ GBC-LPSS-SD-TP-004 para 4.38 – 4.39

distributed if one considers the entire plan period and includes completions and extant permissions⁴.

3. Delivery timing

If the plan delivers the majority of its homes in the last 5 years, and is unable to meet early years needs adequately, is the spatial strategy wrong?

14. The premise of the question raised by parties is flawed, but in any event the spatial strategy is sound.
15. The Council's response to the Inspector's Matters and Issues Question 4 set out its position in relation to justification for the phased approach in the Submission Local Plan. The Council's response⁵ to ID-6 sets out an updated housing trajectory on the basis that all potential additional sites are included. Should the Inspector consider all of these sites are required, the plan would deliver a total of 5,037 houses in Years 1-5; 4,342 in Years 6-10 and 4,683 in Years 11-15. The potential additional sites are considered to be consistent with the Council's submitted spatial strategy.
16. Given the limited contribution of strategic sites in the early years this also reinforces the Council's case at paragraphs 8-12 above.

4. The settlement hierarchy

In selecting sites, did the Council pass too quickly down the settlement hierarchy?

Did it move the goalposts to avoid conclusions it didn't want and get to the outcome it wanted?

17. Reference was made by objectors to the 'goal posts' being moved in that GBCS Vol III, relating to villages, considered all edge of village sites, but the urban assessment in Vol II did not consider the more sensitive urban edge parcels. However, no reference was made by objectors to the Addendum to Vol II, which was prepared to ensure that all edge of urban area sites were considered, regardless of their sensitivity. Both areas have therefore been assessed with the same "goal" in mind.
18. Accordingly, the Study provided the Council with relevant information which could be used to assess if exceptional circumstances applied to warrant allocations.
19. Further to the answer above, the Council points out that the GBCS was commissioned and produced without any predetermination of outcome. There was no moving of goalposts or equivalent to avoid outcomes in terms of overall strategy or individual sites.
20. Whilst the spatial hierarchy begins with the most sustainable locations and moves to less sustainable, it is important to recognise that each of these locations can represent the most sustainable location for development depending on the particular specific circumstances of the site. The hierarchy provides a context within which sites/locations can be considered but it cannot be applied in a mechanistic manner. A range of other factors have to come into play. The Council's justification for moving

⁴ GBC-LPSS-SD-TP-004 Appendix 8 distribution of homes map

⁵ GBC-LPSS-020

through the spatial hierarchy is contained in its response to the Inspector's Matters and Issues Question 9.2.

21. Reference is also made to the opening remarks of Mr Harrison as to the large number of relevant factors to be taken into account when determining on what sites to choose (and what sites to pass over). In terms of site selection it is important to take an overall view of these factors, and not to focus on some to the exclusion of others.

Should there be much more attention to Tiers 1 and 2 of the hierarchy? Should the Council have demonstrated that they had explored a range of mechanisms to deliver urban sites before they could demonstrate exceptional circumstances to remove land from the Green Belt?

22. The response to this question is dealt with below under Question 5.

How could a major Tier 9 site be put forward when there are clear opportunities for development further up the settlement hierarchy?

23. Within the Sustainability Appraisal (SA) 2017⁶, reasonable alternatives were arrived at on the basis of earlier plan-making / SA / consultation, as explained across Sections 6.2 to 6.4 of the SA Report Update (2017). Paragraph 6.6.12 presents the reasons for treating Wisley Airfield as a 'constant' in this context. The Council consider the SA Report Update presents adequate "outline reasons" for treating Wisley Airfield as a constant across the reasonable alternatives. It also notes the positive comments made by the Inspector in the Wisley decision in respect of the site's potential sustainability credentials.

5. The town centre and urban areas

For exceptional circumstances to exist to release land from the Green Belt, shouldn't it be clearly demonstrated that all opportunities for development in the town centre have been exhausted? Isn't the residential capacity of the town centre much higher than the Council states? How is it that the GBCS looked at potential residential development sites but such an approach does not appear to have been done for the town centre?

24. The Council has maximised suitable and available opportunities for development within Tiers 1 and 2 as set out in the Housing Delivery Topic Paper⁷. There are no additional town centre or urban area sites which, importantly, meet the tests set out in the NPPF which can be delivered within the plan period.
25. The Council would not be able to meet OAN without releasing land from the Green Belt. In an effort to reduce the amount of Green Belt land necessary, the Council has explored at length numerous sites through the various iterations of the SHLAA/LAA. Notably in preparing the SHLAA 2014 (and contrary to the suggestion noted in the question), the Council commissioned leading architectural and town planning practice Scott Brownrigg to consider the density and deliverability of sites in the urban areas, in the villages (including possible inset villages) and previously developed land in the Green Belt. The outcome of this work informed the contents of that (and subsequent) assessments.

⁶ GBC-LPSS-CD-005

⁷ GBC-LPSS-SD-TP-004 para 4.64 – 4.74

26. The Council continues to actively explore development opportunities on its current landholdings and through potential site acquisition, and is currently actively working on a number of site acquisitions and development proposals which are commercially sensitive, see its note GBC-LPSS-019 and the work of its major projects team.
27. It has been demonstrated that all available current opportunities for development in the urban area have been exhausted. It is notable that, during the hearing session on the town centre/Guildford urban sites, no party suggested that there were any *deliverable* sites (that is on which there is a realistic prospect of housing being delivered within 5 years) in the town centre.
28. This is not to suggest that the Council is resting on its laurels in respect of bringing forward urban sites. Slyfield Area Regeneration Project (SARP) is a good example of the Council positively bringing about an opportunity of urban renewal. Whether other new opportunities can be identified is the subject of proposed Policy S3. But the decision as to Green Belt has to be made now.

Does the plan rely too much on additional retail in the town centre, limiting the opportunity to provide many more homes where both young and old people want to live? Isn't the North Street redevelopment site within the Council's gift to deliver homes early in the plan period?

29. Soundness is concerned with more than just housing provision. The NPPF requires Local Authorities to seek to meet needs including retail, leisure, office and other main town centre uses in full and are not compromised by limited site availability⁸. The Guildford submission plan does seek to meet the identified retail need primarily on the North Street Allocation site A6. Retail needs are required to use sequentially preferable sites such as the town centre for reasons of sustainability. The allocation must therefore be able to accommodate the identified need as a priority. The policy anticipates retail need may change over time but the main purpose of the allocation will remain being able to meet that retail need⁹. The allocation also makes provision for an additional 400 residential units. This figure is not a cap and if retail need falls the site may be able to accommodate an increased number of residential units. Whilst town centres are sustainable places for residential uses, such uses are not high trip generators and are not subject to the sequential approach. Reference is also made to the discussion on the afternoon of 28th June as to North Street.

Should the plan pay more attention to improving the environment in the town centre?

30. A number of the town centre site allocations include requirements/opportunities which seek to improve the quality of the environment and public realm within those sites, including trying to improve access and views to the River Wey. Following the discussion during the hearing session on Item 13 (Guildford urban area sites), the Council will be reflecting further on how the plan can positively promote the delivery of development and regeneration of the town centre, and contribute towards improving the environment.

Should the spatial strategy pay greater attention to deprived parts of the urban areas?

31. The Council has considered opportunities within some of the more deprived areas within the Guildford urban area for their redevelopment potential however it has not proven to be a realistic option, particularly due to the extent of private landownership. The Council is continuing to progress schemes where the majority of

⁸ NPPF para 23

⁹ See the Council's response to the Inspector's Initial Question 6

the land is within its control and where significant benefits will result in terms of the number/mix of affordable homes. The Council notes that decisions regarding the comprehensive redevelopment of the scale that has been suggested extends beyond the scope of the current plan.

Shouldn't the Council be emphasising the need for the University to intensify the use of its sites before new Green Belt land is taken? Areas of surface car parking could be developed.

32. The University has confirmed that should land within their site be redeveloped or intensified, this would be for their own purposes. It would not therefore be reasonable or realistic to reduce the amount of land that is necessary to meet development needs of the borough. The site at Blackwell Farm is not being proposed to meet University needs.

6. Edge of Guildford urban area

Should there be greater focus on housing and employment sites adjacent to the urban area of Guildford, which are inherently more sustainable?

33. The Council has directed approximately 23% of its supply to sites around the Guildford urban area. This level of growth and the location of these allocations maximises the sustainability merits of this spatial option. Further urban extensions would result in a concentration of sites in one area of the borough and lead to a reduction in the variety of sites. The alternative urban extension sites are less preferable than the allocated sites for the reasons set out in the Council's response to Item 5: Ways Forward¹⁰.
34. Different employment uses have very different characteristic. Office and research and development uses (B1a, B1b) have a high worker floorspace ratio in comparison to light industrial, industrial and storage and distribution uses (B1c, B2 and B8). As a result they generate many more journeys to and from the work place than the more land hungry industrial uses. For this reason, offices and some research and development uses are considered to be high trip generating uses that should be located in highly accessible locations. The industrial uses however are not and can be sustainably located away from town centres and public transport. A more important locational consideration for industrial and storage uses is access to the strategic road network.
35. The plan seeks to direct high trip generating uses to the existing Strategic Employment sites and to the town centre whereas industrial uses, including allocations, can be sustainably located away from the urban area of Guildford.

Should more attention be given to expanding existing housing and employment sites and allocations rather than taking Green Belt land remote from the main urban area?

36. The Council considers the spatial strategy provides the right balance of sites across the borough. This has in part been driven by the need to ensure sufficient early supply which has therefore had implications in relation to the choice of sites allocated. As set out in the Council's response to Item 5: Ways Forward¹¹, the Council considers the approach taken to the capacity of allocated sites is robust although it has identified that there is additional capacity at Site A43 Garlick's Arch.

¹⁰ GBC-LPSS-020 para 27 - 34

¹¹ GBC-LPSS-020 para 9 - 13

37. New employment floorspace is directed to existing suitably located employment sites. However the scale of development necessary to meet employment needs is greater than can be accommodated on existing sites. The expansion of the Surrey Research Park (approx. 11 ha) is on land proposed to be removed from the Green Belt but is well located in terms of public transport provision and close to the existing Guildford urban area.
38. The proposed industrial allocation at Burnt Common measures 9.3ha and is proposed to be removed from the Green Belt. Although it is not within the urban area, the site is considered to be suitably located for a mix of low trip generating industrial uses and has good access to the strategic road network. It is not considered possible to meet this employment need through the expansion of existing industrial or other brownfield sites not in the Green Belt.

7. Edge of Godalming

Should sites adjacent to Godalming be considered as they are adjacent to a town with a range of facilities and transport links? Have such sites been wrongly classified by the GBCS as “adjacent to a village”

39. The Guildford borough boundary directly adjoining the urban edge of Godalming within Waverley borough is limited to the east and west of that settlement. PDAs were identified to the north of Farncombe near to Godalming to the north. The sustainability assessment for these Farncombe PDAs did include the facilities within the adjoining Waverley borough. Given the limited area of the boundary adjoining the urban edge of Godalming to the south and the need for development to come forward within these areas in Waverley to meet the Guildford borough boundary, these areas were not considered further within the GBCS.
40. As set out in the Council’s response to Item 5: Ways Forward¹², the circumstances at the time justified the decision to not allocate the Aaron’s Hill, site adjacent to Godalming. It was however tested as a reasonable alternative in the Sustainability Appraisal (SA) and has been subsequently identified as a potential additional site. The SA grouped this site within “Tier 10 – GB around villages”. Upon reflection, this is misleading but it made no material difference to the approach taken in relation to the site.
41. The site on the edge of Farncombe, identified in Volume V of the GBCS as a potential expansion of settlements located in adjacent boroughs, was ruled out for testing through the SA process¹³. This is a greenfield site that is located within the Surrey Hills AONB. The benefits of allocating an additional site within close proximity of the services in Farncombe is not considered to outweigh the harm of directing major development to the AONB.

8. Village allocations and insetting

42. *Is the proportion of homes allocated to villages too small? Should the Council consider development adjacent to villages as the best way of boosting the delivery of homes within the first 5 years from adoption? Should villages close to Guildford be given favourable consideration?*

¹² GBC-LPSS-020 para 35 - 37

¹³ GBC-LPSS-SD-TP-004 para 4.176

This issue is addressed in the Council's response to Item 5: Ways Forward¹⁴.

In giving villages a lower position in the hierarchy, has the plan failed to recognise that some are sustainable and have a range of transport facilities and local shops?

43. The Council considers that all the spatial hierarchy locations can, in principle, represent a sustainable location for development. This is consistent with the NPPF¹⁵ which states that housing should be located where it will enhance or maintain the vitality of rural communities. However, in identifying where growth should be directed in the first instance, the Council considers it is appropriate to explore first the extent to which strategic sites, particularly those around the main urban areas, can contribute to meeting identified needs.

Were village classifications too simplistic (eg the presence of a garage determining whether a village was classified as "large")?

44. The settlement hierarchy looked at a range of services, facilities and the characteristics of the village in identifying the category of village. A consistent scoring system was used to assess the following indicators:

- the presence of shops, schools and community facilities located in or in the vicinity of the settlement. Community facilities are libraries, places of worship, doctors, dentists, children's play areas, recreation ground/park/public open space, public houses/bars/inns, restaurants/cafes/takeaways, community hall, post office and bank or building society
- access to public transport
- access to employment opportunities

45. The Settlement Hierarchy was prepared a number of years ago and was used to help understand the relative sustainability of all the settlements. The classification was not too simplistic. But in any event it does not in itself serve to dictate the level of growth that may (or may not) be appropriate in any given settlement. Sites are allocated on the basis of a range of other considerations within the context of the relative sustainability of a given settlement or opportunities to improve sustainability.

In seeking to boost homes in the first 5 years, should the Council focus on settlements that have existing sustainable transport links?

How can major housing and employment allocations be made in a location with infrequent bus services?

46. The Submission Local Plan includes a number of early delivery sites around the villages of East and West Horsley. These sites are within a reasonable walking distance to Horsley rail station. In identifying potential additional sites¹⁶, the Council has had regard to a number of factors but has placed appropriate focus on settlements that have existing sustainable transport links. The additional sites adjacent to Godalming, Flexford and Chilworth are also all within reasonable walking distance of rail stations.

¹⁴ GBC-LPSS-020 para 38 - 49

¹⁵ NPPF para 55

¹⁶ GBC-LPSS-020

47. Send is served by existing bus services and there is an opportunity to link the development at Garlick's Arch to a half-hourly new bus service provided by the Wisley Airfield development and initially by the developer of Garlick's Arch. See Council's MIQ response, para 11.36.20- 11.36.25.

Will insetting villages erode their character and lead to too much infill?

48. No, the insetting of the villages would allow a degree of infill development only. However, the erosion of character would be protected through other Local Plan policies in relation to design, heritage and landscape preservation, as advised under NPPF para 86.

49. Some objectors commented that villages should not be inset due to the presence of a Conservation Area. In fact, para 86 specifically highlights Conservation Areas as a means by which the character of villages can be maintained, enabling them to be inset from the Green Belt. Furthermore, the Council is prioritising conservation area appraisals in those villages that are proposed to be inset.

The Local Plan designates new open spaces of amenity value within those villages that are no longer protected by Green Belt.

Has insetting led to illogical GB boundaries?

50. The proposed GB boundaries for village insetting are considered to be logical (13.8 – 13.18 Vol IV GBCS). The GB boundaries follow the principles of NPPF para 86 in terms of the presence or absence of open character that contributes to the openness of the GB and the recognition of physical boundaries that would allow for the creation of new GB boundaries under NPPF paragraph 85 (last bullet). Whilst acknowledging that some elements of site-specific GB boundaries may be perceived to be 'less permanent' than others, if the village exhibits defensible boundaries on the whole, they were considered to satisfy this element of the 3 stage assessment process.

9. Transport

Is the plan over-reliant on A3 RIS-dependent sites?

51. No:

- (a) First, as set out in the Council's note [GBC-LPSS-014] it would be unreasonable not to place reliance on the RIS schemes. As to Wisley, the works to the relevant parts of the A3 are programmed.
- (b) Second, the geography of the borough in terms of both constraints and opportunities is such that, given the need to provide the numbers required it is difficult to avoid dependency on the A3. Guildford is itself a "gap town", being located in the pass in the North Downs where the River Wey was forded, and the A3 bisects the enlarged Guildford urban area as it crosses the Downs.
- (c) Third, given the inherent advantages of the proposed urban area extensions – Blackwell Farm, Gosden Hill Farm and the Slyfield Area Regeneration Project (SARP) – these are therefore of necessity located close to the A3 trunk road.

Fourth, the sites are not necessarily individually dependant in whole or substantial part on the A3 Guildford RIS scheme. It is their cumulative impact that gives rise to concern. All have individual proposals for mitigation, which may need to be accelerated or enhanced if the A3 scheme is delayed, reduced in scope or cancelled. But as noted at (a) it would not be sensible to plan on such a delay but it is sound to proceed as the Council has done, which is to build in a degree of flexibility in respect of potential transport mitigation measures.

Did the transport assessment adequately consider local road networks? Will A3 congestion result in re-routing along unsuitable roads? Is the SHA's conclusion regarding highways impact reductive?

52. Adequate consideration was given to the LRN:

- (a) The Waverley & Guildford Local Plans: Model Development Validation Report (Surrey County Council, June 2016) describes the development and validation of Surrey County Council's strategic transport model, SINTRAM, in the vicinity of the boroughs of Waverley and Guildford for the Local Plan strategic assessment work. This is the Council's submission document GBC-LPSS-SD-039c.
- (b) The SINTRAM model, which was used for the strategic highway assessment as reported in the SHAR 2016, encapsulates the road network of Surrey and surrounding local authorities. All motorways, A and B roads, together with most local roads are represented in Surrey. Where traffic junctions and traffic signals have a significant effect in terms of delay and route choice, details of their layout and/or timing of the signals have been included in the model (paragraph 3.1.2 in Model Development Validation Report).
- (c) All motorways A and B roads, together with most local roads are represented in Surrey. Where traffic junctions and traffic signals have a significant effect in terms of delay and route choice, details of their layout and/or timing of the signals have been included in the model.
- (d) Considerable attention has been paid to the LRN as demonstrated at the sessions on Gosden Hill Farm, SARP and Blackwell Farm, and in this regard the level of detailed consideration and discussion between Council/developer/highway authority is greater than would normally be expected at this stage.
- (e) There are 23 highway specific LRN schemes within the infrastructure schedule to mitigate the impacts of Local Plan growth.

53. As to the more general points as to A3 congestion:-

- (a) Working with Surrey County Council's Transport Studies Team, the Council has undertaken a series of strategic highways assessments, culminating in the SHAR 2016, as described in paragraph 5.17 of the Transport topic paper (GBC-LPSS-SD-TP-002). These studies have been used to identify 'hotspots' on the Local Road Networks and Strategic Road Network which would be adversely impacted in the absence of mitigation.

- (b) Across the Local Plan-making period from 2012, and in particular in 2014-2016, the Council, working with the transport infrastructure and service providers and other relevant parties, identified the potential transport schemes on which it was considered the delivery of the emerging draft Local Plan depends, including to mitigate the principal transport impacts of proposed planned growth. This process is described in paragraphs 5.26-5.34 of the Transport topic paper.
- (c) As part of this process, the Council has included five schemes in the Infrastructure Schedule which are identified explicitly as traffic management and/or environmental improvement schemes on the Local Road Network. Appendix 5 of the Transport topic paper describes the rationale for these schemes, the different types of measure that could feature, and identifies the potential measures that could be implemented for each of the five schemes.
- (d) The network summary statistics for Guildford borough, as presented in the SHAR 2016¹⁷, show that as the RIS schemes are progressively added in scenarios 4 and 5, trips are switching from the Local Road Network to the Strategic Road Network. This demonstrates that the RIS schemes act to reduce the traffic impacts on the Local Road Network.
- (e) In addition, the Submission Local Plan provides the planning policy framework to allow for the consideration of such additional mitigation either through the development management process for planning applications, having regard particularly to Policy ID3 at point (7), or through any updates to the Infrastructure Schedule provided in the latest Guildford borough Infrastructure Delivery Plan, as provided for in Policy ID1 at point (4) and in Policy ID3 at point (8).
54. The Council would emphasise that the SHAR 2016 represents a robust “worst case” in terms of transport demand and supply assumptions, as it does not assess and therefore does not account for the mitigation; including the potential for modal shift, and the new and improved sustainable transport choices provided by the rail, bus and active modes schemes included in the Submission Local Plan and makes no allowance for any internalisation of trips within the larger sites. Accordingly, the Plan seeks to achieve a modest modal shift over the period to 2034, within the context of an absolute increase in traffic volumes, that latter accommodated by schemes to increase highway capacity and improve road safety. This is set out in paragraph 4.6.28 of the Plan. This is consistent with paragraph 29 of the NPPF which states that ‘The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel’ (paragraph 29).
55. Finally the SHAR’s conclusions are appropriately presented. The SHAR 2016 presents detailed analysis throughout the report, whilst the conclusion in the

¹⁷ Tables 4.1a and 4.1b.

Summary section addresses the NPPF paragraph 32 policy test, appropriately caveated.

Are claims for modal shift arising from the sustainable transport measures exaggerated?

56. No. The plan predicts a modest modal shift over the plan period, however the SHAR (2016) does not assume any modal shift..

10. The GBCS

Was the GBCS approach too coarse-grained in looking at the whole parcel in relation to the Green Belt and paying insufficient attention to the contribution that individual sites made? Should the potential for mitigation have been investigated before ruling sites out?

57. Some GB studies with a 2 stage methodology do have such a weakness, by discounting the consideration of some larger parcels due to initial Stage 1 sensitivity results and subsequent sieving. However, this Study has looked at all urban edge and village edge parcels in greater detail, through Vol II Addendum and Vol III, even if they were classed as lying within highly sensitive larger parcels, in terms of their scoring against GB purposes.
58. Therefore the GBCS, having established the GB sensitivity of larger land parcels across the Borough, sought to identify smaller parcels or PDAs on the urban edge and villages that would not harm the main purposes of the wider GB. . Essentially, the GBCS provided the Council with relevant information which was used to assess if exceptional circumstances applied to warrant allocations.
59. With regards potential mitigation, the GBCS considered the borough in the baseline condition and the presence or absence of existing physical features that already exist. The GBCS considered PDAs within a smaller part of a land parcel, and therefore by virtue did consider individual sites within a particular land parcel. However, the GBCS did not consider site specific mitigation measures such as the potential locations of open space or provision of new GB boundaries, due to the practicalities of undertaking such an assessment.

As all Green Belt purposes are equal, was it wrong of the GBCS to score sites lower if they fulfilled one or two GB purposes? What if a site meets one GB purpose strongly?

60. In general terms, an approach that gives greater protection to the parcels which serve the most GB purposes, is considered reasonable. If such an approach resulted in all high scoring parcels (i.e. those that served several purposes) being protected, and all low scoring parcels (i.e. those that served less than 3 purposes) being allocated for development, then the concern raised might be justified.
61. However, this is not the case with the GBCS, or the Council's use of it. All sites on the urban and village edge have been assessed in greater detail and recommendations made allowing for this. Subsequent decisions made by the Council are therefore not based simply on how many purposes a parcel serves. Whilst the Council used the sensitivity of parcels as a starting position, a range of other factors were considered in arriving at the final spatial strategy.

Was the GBCS wrong in equating defensible boundaries with high sensitivity Green Belt? Has the plan chosen too many sites with non-defensible boundaries?

62. In order to allow for the consideration of all edge of urban and village sites, some higher sensitivity parcels were considered in greater detail in Vol II Addendum and Vol III of the GBCS. In turn, some PDAs were identified, and potential GB boundaries proposed in the GBCS, that were within higher sensitivity parcels.
63. It was not for the GBCS to determine whether exceptional circumstances were present to warrant the allocation of such PDAs and subsequent amendment to GB boundaries in higher sensitivity parcels. The GBCS provided the Council with the relevant background information to make decisions in this respect.
64. With regards to the insetting of villages, NPPF para 86 advises that the villages should be inset if they do not contribute to the open character of the wider GB. As such, the village insetting test within the GBCS was not related to the sensitivity of land parcels they fell within. The village insetting proposals within the LP are considered to be justified in terms of the protection of the open character of the wider GB and the identification of defensible boundaries surrounding the villages, as explained at 13.8 – 13.18 of Vol IV of the GBCS.

11. Landscape

Has the plan applied the wrong approach to AONB? In addition, is the plan contradictory in its policy towards AONB and AGLV – are candidate AONB sites different from AGLV as a whole?

65. The Council considers that the spatial strategy adopted by the Council is consistent with the NPPF which states that great weight should be given to conserving landscape and scenic beauty in Areas of Outstanding Natural Beauty¹⁸. The Council do not consider there are any additional benefits to allocating greenfield sites within the AONB that would outweigh the harm of doing so.
66. The plan retains the AGLV designation until such time as the AONB boundary review is complete. The extent of the AGLV designation has not changed. Paragraph 4.3.8 of the Submission Local Plan refers to the fact that the candidate areas (AGLV land that has been identified as potentially being worthy of AONB designation) are not to be given any additional status above their current AGLV status as a result of identification as candidate areas. The outcome of the AONB boundary review may result in different areas of land being designated as AONB to those currently identified as candidate areas and the Council therefore considers it justified to maintain a precautionary approach that retains the AGLV designation until the boundary review has been undertaken.
67. To help clarify the wording in the plan, the Council proposes the following draft modification (para 4.3.8):

“Prior to the completion of the review, the identified candidate areas will retain their current status as AGLV not be given any greater status than their current AGLV designation.”

Was the setting of the AONB adequately considered?

68. Through the preparation of the plan, consideration has been given to the setting of the AONB. The plan has directed site allocations away from the AONB/AGLV. The

¹⁸ See Council's response to Inspector's Matters and Issues Question 9.7

two allocations which are wholly within the AONB (A32 and A33) are previously developed sites where the proposed development would not have a greater impact on the AONB.

69. The only greenfield site allocation which includes a small area of AONB/AGLV is site allocation A26: Blackwell Farm. The draft Local Plan 2014 included a larger allocation for Blackwell Farm which incorporated the land parcel to the south of the current allocation leading up to the Hogs Back. Following concerns raised regarding the impact that this part of the site would have on the AONB, this part of the site was removed in the Regulation 19 Local Plan (2016). This reduction in the scale of the site has significantly reduced the visual impact of this site given how steeply it slopes up to the Hogs Back and the difficulties this gradient has in implementing any mitigation measures. The Council considers on the basis of evidence submitted as part of the Council's response to the Inspector's Matters and Issues Question 11¹⁹, that neither the proposed access road nor the development would have a significant impact on the setting of the AONB.

12. Heritage assets

Was the GBCS in error by extending the Green Belt purpose relating to historic towns to other heritage assets such as conservation areas and historic parks and gardens?

70. The GBCS did consider the locations of conservation areas, scheduled monuments and registered parks and gardens within the assessment of GB purpose 4. Whilst going beyond the strict wording within the NPPF purposes, this approach was considered reasonable and has also been applied by other GB studies. It enables the impact upon historic settlements, as opposed to simply historic towns, to be considered, plus heritage aspects of Guildford, as a recognised historic town. Further explanation at paragraphs 2.5- 2.6 of Vol II Addendum of the GBCS.

13. New Green Belt

Is separation between the Ash and Tongham urban area and Ash Village achievable with a green buffer and ordinary development management policies?

71. The Council considers that the proposed new Green Belt would play a strong anti-coalescence role in preventing the merging of Ash and Tongham urban area with the village of Ash Green. Given the increased development pressures currently in this area, there is a very real possibility of coalescence occurring which constitutes the exceptional circumstances for extending the Green Belt in this area²⁰.
72. However, should the Inspector be minded to not accept that exceptional circumstances exist for additional Green Belt, the Council would seek to bring in an alternative policy designation in order to try and achieve the same outcome, albeit it considers that such a policy would provide a lesser degree of protection than Green Belt designation.

¹⁹ See Appendix 11.2 and Appendix 11.3

²⁰ See Council's response to Inspector's Matters and Issues Question 9.9

73. The Council considers that, if the Inspector concludes that it would be unsound to include additional land in the Green Belt, Policy P3 should be amended to include this land. The following is proposed as a draft modification to Policy P3²¹:

- (1) Within the area of countryside, as designated on the Policies Map, development will be permitted provided it:
 - (a) requires a countryside location or where a rural location can be justified, and
 - (b) is proportionate to the nature and scale of the site, its setting and countryside location, and
 - (c) does not lead to greater physical or visual coalescence between (i) the Ash and Tongham urban area and (ii) either Aldershot or Ash Green village.

14. Water management

In the plan, is the issue of water management (in all its forms), and its related infrastructure, paid adequate attention?

74. Water management has been considered carefully in the preparation of the Local Plan. Evidence gathered is considered appropriate and proportionate and has informed the preparation of the Plan in relation to flood risk reduction, water quality, and water and waste water supply and treatment.

Flood risk reduction at water quality

75. In relation to flood risk reduction, the Infrastructure Delivery Plan or IDP (LPSS-029) provides context for how this has been addressed as part of the Local Plan process at para 3.50 – 3.67. This includes reference to the **evidence base** including:

- The Level 2 SFRA (2016)²² and Level 2 SFRA Addendum (December 2017)²³ considered flood risk on allocated sites (i.e. sites which progressed beyond the Level 1 assessment) and included recommendations to deal with this risk, which have been taken account of in the Submission Local Plan's site allocation policies.
- The SFRA Addendum updated the 2016 SFRA to include further detail, in particular on ensuring safe access and egress from allocated sites affected by flood risk, and advice to potential applicants on ensuring that site-specific flood risk assessments take account of climate change in line with latest national guidance in the NPPG. The SFRA Addendum also explains the modelling used in the Level 2 SFRA (2016) to assess flood risk on allocated sites, and outlines the need for developers to factor in allowances for climate change in site-specific flood risk assessments.
- The Guildford Surface Water Management Plan²⁴ and Ash Surface Water Management Study²⁵.

²¹ Modifications will also be required to the Reasoned Justification section

²² Submission document ID ref. GBC-LPSS-SD-020e

²³ Submission document ID ref. GBC-LPSS-SD-020f

²⁴ Submission document ID ref. GBC-LPSS-SD-021 & 21a

Furthermore, The Water Quality Assessment (WQA) Stage 2 Final report²⁶ assessed fluvial flood risk for each of the allocated sites in the Plan (using EA flood maps) and surface water flood risk (using Risk of Flooding from Surface Water (RoFfSW) mapping produced by the EA). It also addressed the impact of proposed growth on water quality and on sewerage infrastructure needs and environmental capacity.

76. In terms of the **Local Plan and the related management of flood risk:**

- Policy P4 of the Plan sets out detailed criteria to which applications for development of sites at risk of flooding must adhere, covering flood risk and mitigation, water quality and drainage.
- These will ensure that proposed developments do not increase flood risk (or surface water run-off) on the site or elsewhere, and where possible reduce flood risk overall.
- In relation to surface water, policy P4 recommends incorporating Sustainable Drainage Systems (SuDs) to manage surface water drainage, which should be adequately managed and maintained; it also states that proposals should have regard to the Guildford Surface Water Management Plan and Ash Surface Water Study.
- Policy ID4 (7) refers to the need for developers to demonstrate that their proposals support the aims of the Water Framework Directive and Wey Catchment Management Plan and adhere to EA guidance on flood risk management.
- The allocation policies for all of those sites that the evidence above showed to be at risk (or partially at risk) from fluvial flooding include requirement wording to mitigate and manage flood risk, and wording in relation to opportunities to reduce flood risk elsewhere as appropriate.
- The allocations in the Submission Local Plan for sites at risk of flooding refer to mitigation measures or where the site falls within flood zones 2 or 3, to the Level 2 SFRA and its detailed flood risk management recommendations.
- The Local Plan Infrastructure Schedule at appendix C provides for flood risk: surface water mitigation measures (FRR)²⁷. These are cross-referenced by requirements²⁸ in the site allocation policies and addressed through the provisions of Policy ID1 which ensures the timely delivery of infrastructure when first needed.

Water supply and waste water treatment

77. In relation to waste water treatment and water supply, the IDP provides the context for how these matters have been addressed as part of the Local Plan process at para 3.1 – 3.22 and 3.23 – 3.49 respectively. This includes reference to the **evidence base** including inter alia the WQA, which specifically addressed capacity at Waste

²⁵ Submission document ID ref. GBC-LPSS-SD-021c & 21d

²⁶ Submission document ID ref. GBC-LPSS-SD-037b

²⁷ See page 304 of the Local Plan

²⁸ e.g. requirement (9) under Policy A26 on page 193 of the Local Plan

water Treatment Works (WwTWs). This has been supplemented by comments from Infrastructure providers during the preparation of the Local Plan.

In terms of the **Local Plan and addressing necessary infrastructure requirements:**

- The Local Plan Infrastructure Schedule provides for upgrades to water supply (WS) and wastewater connections and treatment (WCT) infrastructure.²⁹
- This is cross-referenced by requirement (9) under Policy A26 and the provisions of Policy ID1.

Statement of Common Ground with the Environmental Agency

78. Further to the above, a Statement of Common Ground was agreed and formally signed off by the EA prior to submission of the Plan.

79. This dealt with a range of concerns on water management, water quality (including quality of waterbodies and groundwater) and environmental capacity of sewerage infrastructure bodies to cope with growth proposed in the Plan.

Proposed amendments to site allocation policies

80. The Council proposes two further modifications to the Submission Local Plan (2017) to address the issue of water management throughout the Plan. These address points raised in Worplesden Parish Council's draft Statement of Common Ground in cases where the Council has deemed further modification appropriate.

81. The first modification seeks to ensure consistency of wording in the Site Allocation policies with Policy P4 (5) and the mitigation measures FRR1, FRR2 and FRR2 of the Infrastructure Delivery Plan. For consistency of wording throughout the Plan, the Council proposes to extend this requirement to other site allocation policies where surface water flood risk is a key consideration.

82. The second modification introduces an opportunity for developers of allocated sites to reduce the existing risk of flooding on other sites with surface water risk where practicable. The Council agrees that it is important to take such opportunities where feasible, yet also recognises that flows from the allocated sites may not necessarily be the causes of such flooding and that in such cases improvements to flood risk on other sites would be betterment, which would need to be agreed with the Lead Local Flood Authority at planning application stage.

Draft proposed modifications

83. Amend requirements to policies A25 (criteria 14), A26 (criteria 13), and A40 (criteria 3) and include new criteria to policies A37, A38, A39, A42 and A50 as follows:

²⁹ See pages 302-303 of the Local Plan

Reduce Minimise surface water flood risk through appropriate mitigation, to ensure that run-off from the site is no greater than run-off rates from the site before development

84. Insert new criteria under the opportunities section for policies A25, A26, A37, A38, A39, A40, A42 and A50:

(2) Reduce the risk of flooding elsewhere as far as practicable

2 July 2018