

**GUILDFORD BOROUGH LOCAL
PLAN REVIEW**

Inspector's Report

September 2001

**Environmental and
Planning Services**





GUILDFORD
B O R O U G H

This document contains the report of the Inspector on the Public Local Inquiry into objections to the Guildford Borough Local Plan Deposit Version – February 1999.

The report represents the views of the Inspector only and has not been considered by the Council at this time.

September 2001

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13th September 2001

The Chief Executive
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Dear Sir,

**GUILDFORD BOROUGH LOCAL PLAN 1999
REPORT OF THE PUBLIC LOCAL INQUIRY INTO OBJECTIONS TO THE PLAN**

1. I enclose my Report on the Objections made to the Guildford Borough Local Plan, Deposit Version, February 1999.
2. The Council will be aware of the number of representations made in respect of the Plan, in its Deposited Version and in respect of the proposed changes put forward by the Council. A number of the representations were in support of the Plan, others were withdrawn and yet others withdrawn on the condition that certain of the proposed changes were made. I have considered the outstanding Objections, including those said to be conditionally withdrawn, and taken note of the representations in support of the Plan, without referring to them individually. I have taken no action on those Objections unconditionally withdrawn.
3. A pre-inquiry Meeting was held on 8 February 2000. All respondents were invited to this meeting, which set the general arrangements for the Inquiry. The organisation of the Inquiry was very ably handled by Mrs Butcher, the Programme Officer, and I was most grateful for her assistance. The Inquiry opened on 9 May and closed on 6 October 2000 having sat for 37 days. Round table sessions were held on matters of housing land supply and affordable housing, and, with the Council's agreement in individual cases, a number of Objectors opted for Hearings rather than full Inquiry sessions. Both procedures saved Inquiry time and I was grateful for the cooperation and good will evident in all those concerned with the Inquiry. Although only a modest proportion of the Objectors appeared at the Inquiry, many of the most significant Objections were heard. The remainder were dealt with on the basis of written representations. I visited all sites that figured in the Inquiry, including those concerned in the written cases, many during the course of the Inquiry, but others in the period immediately following the close.
4. The Report has been written in the shorter form and I have endeavoured to restrict its length. I have included a summary of the background to policies where it seems appropriate. The cases for Objectors are briefly set out, as are matters dealt with by proposed changes, to identify the outstanding issues. The Council's cases have not been reported at length or under a specific heading, but the salient points should be clear from my consideration. If not, it can be assumed that I accepted what the Council had to say unless I stated my disagreement.

5. Many of my recommendations relate to the incorporation of the Pre-Inquiry Changes proposed by the Council into the Plan. I have used the numbers given by the Council, or where there was no number or I was uncertain of it I have included the proposed change in full. I have recommended some other changes, where I thought policies were not serving their purpose as effectively as they might, or not following Government advice. I felt it would be more helpful in conveying my suggestions if I include a new or alternative wording for policies or the reasoned justification. In most instances I have done this, and invite the Council to give it consideration, but to alter it where it would then better fit the Council's intentions or the style of the Plan. In making these recommendations there was no implied criticism of the Council or its officers, much of the advice being open to different interpretations and I would not pretend that planning is an exact science.

6. Government advice is regularly being updated and some time having elapsed since the preparation of the Plan there is an inevitable need to change elements of the Plan if it is to keep in step. Similarly the review of the Structure Plan seems to have made progress in recent months. The Local Transport Plan, available in its Provisional form, will also have a bearing on the Plan. In general terms, I may have noted, but I have not otherwise taken into account in my recommendations advice or plans that were not in the public domain at the close of the Inquiry. The Council may wish to consider if there are matters they now wish to take into account.

7. I have not attached lists of appearances or of documents submitted to the Inquiry to my Report. These were prepared by Mrs Butcher and submitted to the Council soon after the end of the Inquiry. I have included a summary of the Report and a Table of Contents which will serve to locate my consideration of individual policies and in most instances the specific sites that were proposed by Objectors for inclusion under one or another of the policies of the Plan.

8. Finally, in addition to my appreciation of the cooperation received from Objectors, I thank the Council for its hospitality and the help provided by officers and Mr Lewsley in the smooth running of the Inquiry.

Yours faithfully,

SUMMARY OF THE REPORT

1. The Report follows the Chapter headings of the Plan. The first three of these Chapters provide an introduction, give a profile of the Borough and set out the planning strategy to be developed in subsequent Chapters. The changes suggested to the first two Chapters amount mainly to additions and corrections. The Strategy Chapter attracted a close scrutiny of the Aims set out for the Plan, although the changes suggested are to aid their clarity as much as their purpose.
2. The General Policies of Chapter 4 provide the basis for assessment of planning proposals. They are carried forward from the adopted plan, although substantially expanded. The biggest change is in the approach to parking, seeing this as a major element in the pursuit of sustainability and following the revised policy of the County Council. Some changes were suggested to the policies on protection from flooding and the conservation of water resources. I also suggest that the policy on mixed uses is made more encouraging. I considered that a policy was required to deal with the storage, etc., of hazardous substances.
3. It is suggested that the policies of the Plan relating to planning obligations and benefits need to follow the advice exactly and not imply that more may be required. Several of my recommendations relate to this. It is not considered that the Plan should include more than a statement on the "Percentage for Art" policy.
4. The housing proposals of the Plan are generally accepted. No need was seen to add to the housing allocations, although this view took into account that an urban capacity study would now be expected to identify the opportunities for development in the urban areas and that densities would be increased in line with current advice. This suggested a policy on density levels be included in the Plan and the yield expected from sites, including the Queen Elizabeth Barracks/Chart Depot site, take account of the current advice.
5. Affordable housing issues attracted a considerable number of responses. That the need could not be met in full by the Plan was acknowledged. That the situation was serious and justified special measures was accepted. The rural exceptions policy appeared to be misunderstood by some Objectors and it would be important that this were not seen as a means of attaining general residential development adjoining villages.
6. The Plan notes both the prosperity and the constraints on labour supply and proposes no significant increases in employment allocations and looks to a reuse of employment land and buildings to allow the necessary scope for the further development and change of the local economy. This approach is supported, together with the policies proposed to retain employment land in employment use.
7. The Movement Chapter recognises the limitations of the Plan in approaching the problems of congestion and draws attention to the other plans that have a bearing on transportation and movement. The Local Transport Plan has come to greater prominence since the Plan was deposited and now warrants greater emphasis. Its most significant

policies were directed towards the attainment of more sustainable development, including the location of development and the new policy on parking, the provision for Park and Ride and public transport. While in a number of respects controversial, I considered that the policies should be supported.

8. The Shopping policies sought in particular to maintain the position of Guildford Town Centre in the shopping hierarchy, while protecting its distinctive character. The proposals were generally accepted, the areas of controversy concerning the growth and location of food and drink uses and the availability of short term car parking, which I considered that the Plan dealt with in a practical way. I have not considered that it is a practical approach to suggest in a sub-regional centre that no further major development should be expected in the Plan period, or that "major" development should be seen as anything providing more than 1000sqm of gross floorspace. Shopping policies concerning the smaller shopping centres and the rural areas were felt by many not to go far enough, but in my view provided a satisfactory basis of policy within the limits of what the Plan could require.

9. The sites identified for redevelopment in the central areas of Guildford were the subject of revisions following Objections and two further sites were suggested, Guildford Railway Station and the former Odeon Cinema and adjoining Prudential Buildings. The necessity for further hotel development came through in many Objections and was reflected in the proposals for a number of the sites.

10. Most of the rural parts of the Plan area fall in the Metropolitan Green Belt. The changes in the advice relating to the Green Belt and the way they have been reflected in the Plan was a matter of some dispute. I have supported the Council's view that all villages should remain "washed over", rather than the larger being "inset", with new development confined to infilling. Although the Plan's definition of infilling has to be seen as generous when set against that commonly used in the control of development, it was within the intention of the advice. The boundaries for the identified settlements made only small changes from those defined in the adopted plan and in general both the criteria for defining the boundaries and the way they have been drawn, particularly to avoid development that would be excessive in scale or extend the built limits of villages, have been supported. A clearer expression of the mechanism in the Plan has, however, been thought necessary. The identification of Major Developed Sites generally met approval, if there were disputes as to the boundaries of those identified and the omissions.

11. The relatively small rural area of Countryside Beyond the Green Belt is subject to a protective policy with its foundation in the Structure Plan. No settlements have been identified in this area where further modest development may take place and with some small exceptions its boundary with the urban area of Ash/Tongham is not recommended for change.

12. A number of changes are recommended to the Historic and Natural Environment Policies, although these are largely of a technical nature, the broad objectives of both Chapters being supported. The Recreation Policies were similarly supported, but the mechanisms proposed for the provision and protection of open space were criticised by

Objectors and a number of changes have been suggested to make them more practical, fairer and in better accord with the Structure Plan and the advice. It is suggested that the protected open spaces should be scheduled as well as the larger being shown on the Proposals Map. Only relatively small changes were suggested to the Policies proposed to relate to Tourism and Community Facilities, although a more sympathetic attitude to the development required by schools is proposed.

13. The Proposal relating to the University is supported, noting in particular the agreement as to the maximum traffic growth to be permitted, although attention is drawn to the scope that the emergence of the University's plans would allow for further consideration of the extent of the land that would need to be removed from the Green Belt.

TOWN AND COUNTRY PLANNING ACT 1990

GUILDFORD BOROUGH COUNCIL

GUILDFORD BOROUGH LOCAL PLAN

REPORT OF THE PUBLIC LOCAL INQUIRY INTO OBJECTIONS

Inspector: G E Roffey MSc(Econ) DipTP MRTPI

Date of Inquiry: 9 May - 6 October 2000

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INSPECTOR'S INTRODUCTION

1. The Report follows the general order of the Plan, the Chapters, the sub-headings, the Policies and the Paragraphs.
2. The paragraphs of the Report are numbered with three part numbers, the first figure being the Chapter number, the second the sub-division within the Chapter, which I have numbered in all but the first two Chapters, and the third the number of my paragraph beneath that heading. This has the incidental advantage of avoiding confusion between the two-part Paragraph numbers of the Plan and those of the Report, while allowing the Report to be related easily to Chapters and their sub-divisions.
3. For further ease of reference there is a Table of Contents at the beginning of the Report giving the pages where particular Chapters and Policies can be found, together with most sites where there were specific Objections. There is also a table of the abbreviations used in the Report. The Council accorded each Objector a number as well as a discreet number to each Objection. I have used only the Objection numbers in the Report, together with the Objector's name. In respect of some Policies where the Objections were numerous they are listed in an Annex, rather than under the Policy itself
4. The Report is written in the shorter form. In this form the subject of the Objection is outlined and any necessary background or description given. The Council's case is not separately summarised, but I set out briefly what I see to be the main issues involved and may draw on the Council's case in my consideration. Generally, I do not make a formal recommendation where I am proposing no change to the Plan, except in so far as Objections relating to certain Major Developed Sites are concerned. Most of the recommendations relate to the changes to the Plan proposed by the Council prior to or during the Inquiry.
5. There were a number of representations in support of the Plan as a whole or its various parts. These are not mentioned individually. Further Objections were conditionally withdrawn, the consideration usually being that some proposed change is made to the Plan. I have considered these, and the counter-objections which arose from the proposed changes, in the Report. I have taken no action on Objections which were unconditionally withdrawn.
6. An Objection made by the Government Office for the South East (Objection 228) referred to the "whole plan". On examination, the Objection was to a number of matters of policy or of policy expression. These matters were not such as to my mind to invalidate the Plan, and I did not see that as the Objectors intention. Rather, they were matters which appeared at a number of places in the Plan and I have considered them individually where they arise. The Objection of Mr Higgins (Objection 1810), also classed as an objection to the Plan rather than to a specific part of it, I have considered under Chapters 8 and 9.

ABBREVIATIONS USED IN THE REPORT

The Council	Guildford Borough Council
The Plan	Guildford Borough Local Plan, Deposit Version, February 1999
The Adopted Plan	Guildford Borough Local Plan 1993
Inspector's Report	Report of the Inquiry into Objections to Guildford Borough Plan 1990 (the plan above). Mr Tony Pickering, March 1992
The Structure Plan	Surrey Structure Plan 1994
The Structure Plan Review	Surrey Structure Plan 1994 First Alteration Consultation Draft October 1997 (CD43) (This Review did not proceed further)
CD (various numbers)	Inquiry Core Document (a list and copies of these Documents are held by the Council)
PC (sequential numbers)	Change to the Plan proposed by the Council after deposit.
CW	Objection conditionally withdrawn
GOSE	Government Office for the South East
MAFF	Ministry of Agriculture Fisheries and Food
RPG9	Regional Planning Guidance Note 9: Regional Planning Guidance for the South East
PPG (various numbers)	Planning Policy Guidance Note
The Act	Town and Country Planning Act 1990, as amended
Nature Conservation Sites	
pSPA	Proposed Special Protection Areas
cSAC	Candidate Special Areas of Conservation
SSSI	Site of Special Scientific Interest
SNCI	Sites of Nature Conservation Importance
LNR	Local Nature Reserves
RIGS	Regionally Important Geological/Geomorphological Sites
AGLV	Area of Great Landscape Value
HBF	House Builders Federation
CPRE	Council for the Protection of Rural England (Both Surrey and Waverley Branches made representations)

CHAPTER 1. INTRODUCTION

1.1.1. The Chapter sets out the background to the preparation of the Plan as answers to a series of questions. The questions were those that might reasonably be asked by anyone opening the Plan as to why the Plan had been prepared and on what it was based. The answers were factual and commendably brief. Only two Objections related to the Chapter.

Objection 294

Horsley Countryside Preservation Society

1.1.2. The Society considered that there were other planning documents that should be included in the answer to the question "Which other Development Plans are of relevance and how do they relate to each other"(Para 1.7). In particular, mentioned were:-

- the Regional Planning Guidance for the South East (RPG9),
- the Wey Local Environment Agency Plan, and
- the recommendations of the Nolan Committee as to best planning practice.

1.1.3. The Council accepted that there should be reference to the Regional Planning framework and it was proposed to add a sentence to the end of the sub-paragraph referring to the Surrey Structure Plan 1994 (PC1). Accepting that the Regional Guidance will reach the Plan through the Structure Plan I saw no very great problem to this approach, although it would in my view be preferable to give the Regional Guidance its own sub-heading and words of explanation. A suggestion is included in the recommendation.

1.1.4. The Environment Agency's plan for the River Wey, and within the Plan area there are similar plans for the valleys of the Rivers Mole and Lodden also, are of significance, but not in the direct line of Development Plans referred to by this part of the Chapter. Their relevance to the Plan emerges in other Chapters where their local impact on development is recognised.

1.1.5. The Report of the Nolan Committee dealt with matters of planning practice which I had no reason to doubt had been taken into account in the preparation of the Plan. Again, it was not a matter that seemed necessary to include in this Chapter.

Objection 1215

Myddleton Developments Ltd

1.1.6. Para 1.18 sets out the answer to the question "What is the timescale of the Local Plan?" - the period up to March 2006. The adopted Plan, the current development plan for Guildford, had an end date of March 2001. The point made by the Objectors was that a period for the Plan to 2006 was short, shorter than the ten year currency usually sought in local plans. While the Surrey Structure Plan 1994 also had an end date in 2006, there was the likelihood, if not the certainty, that that plan will be extended for a further period long before 2006.

1.1.7. Many of the Policies of the Plan have been carried forward from the adopted plan and would be likely to be quite capable of being maintained in their present form well beyond 2006. I could, however, appreciate that in the current state of the Regional Guidance

and the Review of the Structure Plan there was a degree of uncertainty that made the projection of the all important requirements for land allocation for development difficult. While having considered, particularly in relation to the Housing Chapter, the merits of extending the Plan period at least in so far as the identification of land for future development was concerned, I accepted that the level of uncertainty as to amounts and the strategy for location was such that the Council's view that the Plan should be based on the present certainties and reviewed when the needs beyond 2006 were better known was to be preferred. I did not consider that the period of the Plan should be changed.

1.1.8. A matter which did not arise directly from an Objection related to para 1.2. It was my view that the adopted plan, the current development plan which the Plan will supersede, should be given a little more recognition. It was very familiar to many of the respondents to the Plan and generally understood and supported. In the recommendation I suggest a substitute for the last sentence of para 1.2.

1.1.9. A further matter was the updating of the chart included in para 1.9.

CHAPTER 1. RECOMMENDATIONS.

1.1.1. That PC1 be made;

Alternatively, a new sub-paragraph be added to para 1.17 before the sub-paragraph "Surrey Structure Plan 1994":-

REGIONAL PLANNING GUIDANCE FOR THE SOUTH EAST (RPG9 MARCH 1994)

THE REGIONAL GUIDANCE ISSUED BY THE GOVERNMENT SETS THE BROAD STRATEGY FOR PLANNING IN THE REGION AND PROVIDES THE COUNTY COUNCILS WITH A FRAMEWORK FOR STRUCTURE PLAN REVIEWS.

1.1.2. That the following be substituted for the last sentence of para 1.2.

A SECOND PLAN, THE GUILDFORD BOROUGH LOCAL PLAN 1993, WAS ADOPTED IN 1993 AND IS TO BE REPLACED BY THIS PLAN ON ITS ADOPTION.

1.1.3. That the chart included in para 1.9 be updated as appropriate.

CHAPTER 2. A PROFILE OF THE BOROUGH

2.1.1. The Chapter gives a brief summary of the location and general character of the Plan area and a somewhat fuller account of the planning issues the Plan sets out to tackle. These are developed in the following Chapter into the Aims of the Plan and in the topic Chapters into objectives and Policies.

2.1.2. The Objections related principally to what were seen to be omissions and the issue for me to consider was whether the suggested omissions should be included in the Plan. The Council accepted that some should, and proposed changes for their incorporation. The principal issue in each case was whether the suggested change, or addition should be made, and, if so, this was the appropriate Chapter. The Objections to the Chapter are considered individually.

Objection 1836

CPRE Surrey

2.1.3. The first of the CPRE's Objections asked for an indication of the principal landowners of the Plan area to be mentioned, the examples given including the Council, Surrey County Council, the National Trust and the larger private estates. The larger landowners were seen to have the potential to set an example of high standards of countryside management.

2.1.4. The purpose of the suggestion can be clearly seen, although, no doubt, the larger landowners would assert that they already lead in terms of the management of the rural land of the Plan area. However, land ownership is not of itself a planning issue and the policies to bring about good countryside management from a planning point of view must need apply to all rural land and all landowners. I saw the Council as right to resist the inclusion of such detail or other specific reference to land ownership.

Objection 1837

CPRE Surrey

2.1.5. The second of the Objections related to the recognition among the planning issues of the importance of Guildford as an educational centre and, in so far as the town is concerned, the significance of this in particular to traffic congestion.

2.1.6. There is reference in para 2.43 to the wide range of educational facilities available in the Borough, at the higher education end mentioning the University of Surrey (which has its own Chapter in the Plan), Guildford College and the Royal Surrey County Hospital. The Council saw no need to add to this, but I felt the CPRE was looking to a different planning issue than that dealt with by this sub-section - the provision of educational and community facilities. An addition to para 2.29, in the sub-section dealing with movement as an issue, could be more appropriate. "The concentration of schools, public and private and institutions of higher and further education, particularly in the inner areas of the town, complicates the peak hour traffic patterns" would be a useful addition to the end of para 2.29.

2.1.7. The third matter raised by the CPRE was that there was insufficient emphasis on the decline in agriculture, and it was unclear what proposals there were to tackle a problem which could have a dramatic effect on the rural environment of the Plan area.

2.1.8. It can be accepted that agriculture is currently experiencing considerable difficulties and pressures for change. Paragraph 2.25 notes the decline in employment in agriculture. Aim 2 in the following Chapter gives a recognition to the particular needs of rural companies. Chapter 10 has among its Objectives the support and enhancement of the rural economy and the needs of agriculture and forestry. The Plan has a Policy supporting the Government's drive to diversify the rural economy. It appeared to me that this was not an issue the Plan had dealt with lightly.

CHAPTER 2. RECOMMENDATION 1.

2.1.1. That the following sentence be added to paragraph 2.29:-

THE CONCENTRATION OF SCHOOLS, PUBLIC AND PRIVATE, AND OF INSTITUTIONS OF HIGHER AND FURTHER EDUCATION, PARTICULARLY IN THE INNER AREAS OF THE TOWN, COMPLICATES THE PEAK HOUR TRAFFIC PATTERNS.

2.1.9. The Objector considered that there were weaknesses in the analysis made by the Chapter, which reduced the emphasis given to some issues. The first point related to the omission of mention that the town of Guildford was located in a gap in the North Downs, this feature creating traffic problems which were not capable of solution by traditional means and severely limiting physical expansion of the town.

2.1.10. The Plan made mention of this geographical circumstance in Paragraph 2.4, but the Council proposed adding a further reference in Paragraph 2.30 under the "Movement" issue heading (PC2), where the significance of this to traffic congestion in the town centre would be noted. This satisfied the Objector, although I noted that the same point was also fundamental to other of his Objections to this Chapter.

2.1.11. The second Objection drew attention to the effects of the serious physical constraints and the constraints in terms of the local workforce mentioned in Paragraph 2.24 on the future economy. There was a need SEEN to better utilise the existing resources, making greater use of underused facilities and developing the education and skills of the local work force. It was suggested that an addition be made to the Plan:-

"Development designed to make more efficient use of existing assets and of the education and training of the population and labour force will be given the highest priority."

2.1.12. The Objector's intention is in the broadest sense and essential part of the Plan. In my view, however, such an addition could be reasonably seen to be taking the Plan beyond its scope in land use planning. I do not therefore recommend that it is made.

Objection 331

Councillor Bridger

2.1.13. Applied to retail development, the constraints mentioned earlier were seen to indicate that once the MEPC development were completed, Guildford town centre should be seen to be adequately supplied with retail facilities. It was proposed to add to Paragraph 2.26:-

"The amount of shopping space already agreed for the town centre is sufficient to meet all foreseeable needs".

2.1.14. The Objector may or may not be right in this view, although I suspect it would be difficult to demonstrate convincingly. Retailing is a dynamic section of the economy and in recent years planning policy has been, to facilitate change, as far as is reasonable to do so, and to direct shopping back into the town centres. The Plan makes no proposals for very significant further shopping developments in the Plan period. Its objectives, nevertheless, include the maintenance and enhancement of the vitality and viability of the town centre and its policies would permit some continuing growth and necessary changes within the existing shopping areas. Even recognising that it is essentially congestion that the Objector sees as the principal problem leading to such a stance, it is not one I consider the Plan should take.

2.1.15. The Objector saw a way forward in relation to the congestion problem in general in the better use of the rail links into the town, combined with action to spread the peak hour traffic demand. It was suggested that an addition be made to the Movement sub-section (or to Paragraph 7.12 in Chapter 7, Movement):-

"Recognising the serious physical constraints on traffic flows imposed by the geography of the town highest priority will be given to improving the use of existing rail links and for reducing peak hour traffic jams by supporting and encouraging flexible working hours."

2.1.16. The Council saw no need to make this addition, the Chapter saying enough on the matter of congestion, while Chapter 7 included Policies relevant to the greater use of the rail network and other means for restraining the further growth of congestion. I did not disagree.

CHAPTER 2. RECOMMENDATION 2.

2.1.2. That PC2 be made.

2.1.17. The Objectors accepted PC2, but considered it did not go far enough to convey the full scale of the problem. The A3 to the north of the town gave access to the two routes through the River Wey's gap in the North Downs only through the town centre, the through traffic adding significantly to the local traffic. The resulting congestion at peak times spread to the A3 itself.

2.1.18. I accepted the significance of this aspect of the problem, but, with the Council, saw no need to further elaborate the description of the traffic situation in the town in Paragraphs 2.7 and 2.30.

2.1.19. The Environment Agency sought two additions or changes to the Chapter. The first was recognition of the importance as natural features of the valleys of the Rivers Wey, Tillingbourne and Blackwater. To do so would add support for Policies in subsequent Chapters. It was suggested that the following addition be made:-

"River valleys add significantly to local landscape character and the conservation value of the Borough's natural environment. The River Wey flows slowly through a wide flood plain. The river and its tributaries support many sites of county and national importance for nature conservation. They also support a diverse range of coarse and game fish and provide an important opportunity for developing informal recreation and learning. The River Blackwater is a very important open and ecologically valuable corridor passing through a heavily urbanised area and continuous efforts are under way to improve riverside access and enhance the local environment."

2.1.20. The Council accepted this suggestion, with some small changes, and proposed that it be incorporated into Paragraph 2.40 by PC4. This was in my view an appropriate addition.

2.1.21. The second suggestion was that there should be more significance given to the risk of flooding than the brief reference in Paragraph 2.42. It was suggested that there be a further sub heading "Flooding" above a new paragraph:-

"Flooding from rivers throughout Guildford Borough and in particular the River Wey in Guildford Town Centre will be a major constraint on development. The river floodplains are a natural resource and must be protected and where appropriate restored."

2.1.22. The Environment Agency's point was given added emphasis shortly after the close of the Inquiry, but the Council had proposed that the suggestion should be incorporated into the Plan, if in part in somewhat different words. The Council proposed extension of the sub-section headed "Air Quality and Water Quality" by the addition of "And Flooding" and two further sentences in Paragraph 2.42 (PC5). Of no less significance to the point made by

the Objectors were changes proposed to Policy 99G1(6), Flood Protection, and its supporting Paragraphs by PC17 and PC18.

Objection C227

HBF

2.1.23. PC5 included the second sentence of the Environment Agency's suggestion. The House Builders Federation considered that this went beyond the advice of Circular 30/92, which says that development can take place in flood plains, provided flood risk protection and other mitigation measures are undertaken.

2.1.24. The Council saw it as appropriate to have the protection and restoration of floodplains as a broad objective of the Plan. Recent experience could be seen to give this view support. The Circular, however, revised earlier advice to take account of the possible effects of global warming. As noted above, the real impact of the Plan on development that might effect floodplains comes in a later Chapter and in this Chapter the sentence complained of could be omitted.

Objection 1426

Environment Agency

2.1.25. The Agency's third Objection to this Chapter related to the need to recognise the importance of groundwater among the water resources of the Plan area. A change was proposed to the first sentence of Paragraph 2.42:-

"The River Wey and Blackwater River are the two main surface water sources in the Borough. In addition the Chalk and Lower Greensand are major aquifers that outcrop in the southern half of the Borough and the groundwater in these aquifers is used for potable supply."

2.1.26. The Council's suggested change (PC5) included the second sentence, but left the first unchanged. This would leave the Plan indicating that the Rivers Wey and Blackwater were the two main water sources in the Borough, rather than the two main surface water sources. I had no information as to whether this was an accurate representation, although my feeling was that the Environment Agency's suggestion presented a better balance. While I recommend that this part of PC5 be incorporated in the Plan, I also suggest that the first sentence of Paragraph 2.42 has the small additions suggested by the Objector.

CHAPTER 2. RECOMMENDATION 3.

2.1.3. That PC4 be made.

2.1.4. That PC5 be made, as referred to above, with the omission of the second sentence.

In addition, the first sentence of Paragraph 2.42 be changed as follows:-

THE RIVER WEY AND BLACKWATER RIVER ARE THE TWO
MAIN SURFACE WATER SOURCES IN THE BOROUGH.

Objection 1841

CPRE Surrey (CW)

1.2.27. The CPRE expressed concern that water supply had not been identified as an issue. It was considered that this would prove a serious constraint on further development in the Plan area. The reason for the Objection could be easily understood in the context of recent dry years. It was not, however, among the constraints identified by the Water Companies or the Environment Agency, who no doubt took into account the relatively modest development proposals of the Plan.

Objection 1538

St Martha Parish Council (CW)

2.1.28. The Parish Council sought two changes to the Plan. The first was the omission of "particularly" in the final sentence of Paragraph 2.6, substituting what was seen to be the strengthening "and exceptionally so". The Council agreed that this should be done in PC3.

2.1.29. The second related to an addition to Paragraph 2.37 to read:-

"The Borough contains areas of exceptional landscape beauty as well as a wealth of natural habitats ..."

This the Council also proposed to add as a part of PC4.

2.1.30. Both appeared to me to be changes that would benefit this Chapter.

Objection 73

English Nature

2.1.31. English Nature referred to Paragraph 2.37 under the sub-heading "The Natural Environment". It was suggested that a further paragraph be added mentioning the Surrey Biodiversity Initiative, which will lead to a Biodiversity Action Plan for the County.

2.1.32. Rather than in this Chapter, the Council proposed an addition to the sub-sections dealing with Objectives and Supporting Measures in Chapter 12, Natural Environment (PC7). This appeared to me an appropriate place to make such a change and to more than meet the request of the Objector. I noted that the Objector shared this view.

CHAPTER 2. RECOMMENDATION 4.

2.1.5. That PC3 be made.

2.1.6. That PC4 be made.

2.1.7. That PC7 be made.

CHAPTER 3. THE PLANNING STRATEGY FOR GUILDFORD BOROUGH

1. INTRODUCTION

Objection 74

English Nature (CW)

3.1.1. The Objector considered that reference should be made to the Government's Planning Policy Guidance Notes and a list of the extant notes included in an appendix. The Council accepted that Paragraph 3.1 should be expanded in this respect and an appropriate appendix included (PC6). PC165 corrected a printing error in the Paragraph.

CHAPTER 3. RECOMMENDATION 1.

3.1.1. That PC6 be made.

3.1.2. That PC165 be made.

2. DEVELOPMENT OF THE STRATEGY

Objection 1842

CPRE Surrey

3.2.1. The Objectors stressed the overriding need to reduce traffic levels in absolute terms, not simply to reduce the growth of traffic as the Plan implied. As well as the National objectives in this regard, there were local imperatives in the high rate of car ownership in the Borough and the impact of congestion on the proper functioning of Guildford.

3.2.2. The Council indicated that the Strategic Priorities listed in Paragraph 3.7 were drawn from the Council's general priorities drawn up and published following public consultation (Guildford Best Value Performance Plan 2000). They applied generally to the Council's services rather than only to the Plan. However, it was accepted that in reproducing them in the Plan the second of these agreed priorities had been omitted:-

"Reducing the adverse impact of motor vehicles on the quality of life in the Borough (and in particular the town centre) without reducing our competitiveness"(FPC1).

3.2.3. The Objectors saw the suggestion that this further priority be added as going only part way to meeting their point. I could appreciate that. However, paragraph 3.7 is reporting the agreed strategic priorities published elsewhere. Aim 5, to reduce the demand for travel by car may have more significance to the Plan. Objections to that Aim are considered below. In so far as Paragraph 3.7 is concerned it is to my view sufficient to add the further priority as it is written in the published brochure. Similarly, for the sake of consistency, "Local" should be added before "Agenda 21" in the first of the priorities.

3.2.4. The Objectors asked that "Local" be added before "Agenda 21" in Paragraphs 3.7 and 3.9. For the sake of consistency with the brochure, "Local" should be added in Paragraph 3.7. PC8 proposed its addition in Paragraph 3.9.

Objection 75

English Nature (CW)

3.2.5. English Nature asked for reference to be made to Biodiversity (the Convention on Biological Diversity 1992), including reference to the UK National Biodiversity Action Plan and the local Surrey Biodiversity Initiative.

3.2.6. As remarked in relation to Objection 73 considered in the previous Chapter, the Council proposed additions to Paragraph 12.7 in Chapter 12, Natural Environment (PC7 and PC125), that would include reference to the Surrey Biodiversity Initiative and the Biodiversity Action Plan. On the assumption that these additions would be made the Objection was conditionally withdrawn.

Objection 861

Guildford Environmental Forum (CW)

3.2.7. The Objection sought the addition of a further paragraph after Paragraph 3.8 that would set out the five principles of sustainability from the UK Round Table on Sustainable Development.

3.2.8. The Plan under the sub-heading "Sustainable Development" includes the commonly used definition of sustainable development and a brief description of the way that the Plan reflects sustainability principles. From the point of view of the Plan, I did not consider that more was needed at this point.

Objection 1424

Thames Water

3.2.9. Attention was drawn to the guidance of PPG12 that a sustainable approach to new development should embrace the need for implementation to be fully coordinated with infrastructure. It was proposed that a further objective be added to Paragraph 3.9 to reflect the principles of sustainability:-

"Coordinating new development with the infrastructure it demands and taking into account the capacity of existing infrastructure".

3.2.10. The Council saw this as essentially a matter of detail, rather than a fundamental principle of sustainability, dealt with in the following Chapter. Since the Objection was made a new edition of PPG12 has been published (December 1999). The suggestion by Thames Water remains the essence of the guidance, but with the Council I see the following Chapter, in which a new Policy is proposed dealing with the utility infrastructure, as adequately meeting the point.

CHAPTER 3. RECOMMENDATION 2.

3.2.1. That in Paragraph 3.7 be added a further bullet point and:-

DIMINISHING THE ADVERSE IMPACT OF MOTOR VEHICLES ON THE QUALITY OF LIFE IN THE BOROUGH (AND IN PARTICULAR THE TOWN CENTRE) WITHOUT REDUCING OUR COMPETITIVENESS.

3.2.2. That in Paragraph 3.7, Bullet point 1 "LOCAL" be added before "AGENDA 21".

3.2.3. That PC7 and PC125 be made.

3. AIMS

3.3.1. The sub-section sets out ten Aims as means to achieving the overall Aim of the Plan for sustainability, in which it repeated the commonly used definition already included in Paragraph 3.8, to:-

"Promote development that meets the needs of the present without compromising the ability of future generations to meet their own needs".

The Aims attracted a number of responses, many in support and many more seeking the addition of further Aims or the adjustment of those included. The Council in general was anxious not to add unnecessarily to the number or the complexity of the aims, fearing, not unreasonably, that to do so would either take the Plan away from its land use focus, or blunt their purpose.

Objection 1653

Country Landowners Association

3.3.2. The Objectors considered that the Plan would benefit from an initial objective providing for an integrated policy for the countryside, taking in affordable housing, employment services and access. I could see the point of this, but considered that, having regard to the character of the Plan area, the comprehensive approach to both town and country adopted by the Plan is to be preferred.

A. OVERALL AIM

Objection 743

The Guildford Society

Objections 863, 864

Guildford Environmental Forum

3.3.3. The Objectors asked that DETR's definition of a sustainable community (Sustainable Communities for the 21st Century, DETR 1998) be reproduced at this point in the Plan. Failing that, the aim to:-

"Use energy, water and other natural resources efficiently and with care"

should be added.

3.3.4. I accepted the Council's point that the Aims incorporated in the Plan should be those related to land use planning, sustainability requiring endeavour in a much wider field as well as through the Plan. The Plan I considered covered the objectives and routes to sustainability adequately for its purpose and that this further addition would not be a significant improvement.

B. AIM 1. MAINTAIN AND PROVIDE FOR A RANGE OF GOOD QUALITY HOUSING AFFORDABLE BY ALL RESIDENTS THROUGHOUT THE BOROUGH

Objection 1843

CPRE Surrey

3.3.5. The Objectors considered that the pattern of building taking place in the Plan area was leading to a preponderance of larger dwellings in the housing stock, at the same time pushing house prices beyond the reach of many young people and adding to commuting pressures. They asked for an addition to Aim 1:-

"with the range being determined according to needs of the Borough's residents as a priority."

3.3.6. The Objectors noted that this aspiration was covered in Paragraph 5.7, but proposed that the objective be reinforced here.

3.3.7. While appreciating the Objector's point, this is a matter to which the Plan gives considerable attention and is well covered in Chapter 5, Housing. It appeared to me that in its recognition of "affordability" this Aim was going as far as it need.

Objection 1541

St Martha Parish Council

3.3.8. The concern of the Parish Council was the last sentence of Paragraph 3.16. That read "The Plan also includes a policy to enable the provision of affordable housing for local needs adjoining the villages in rural areas". It was suggested that expanding onto greenfield sites was not a sustainable policy - and set a dangerous precedent. Achieving a higher proportion of affordable housing on housing developments should take priority. At the end of the sentence should be added:-

"If on brownfield sites".

3.3.9. The sentence in Paragraph 3.16 was referring to what is often known as the "rural exceptions policy", which derives from Government guidance and in the Plan is represented by Policy 99H12. This policy is directed to permitting affordable housing to be built on the edge of villages, strictly for local needs. The assumption is that to achieve the site cost savings necessary to make the housing "affordable" it will be mainly greenfield land that is taken for developments that will be exceptional and small in scale. To add the phrase suggested would be in danger of defeating the objective of Policy 99H12.

3.3.10. Policy 99H11 and its supporting paragraphs deal comprehensively with proposals of the Plan for seeking affordable housing as a part of all housing developments above the defined size thresholds. The thresholds and the proportion of the houses to be sought as "affordable" were in themselves controversial. These issues are considered in relation to this and other Housing Chapter Policies.

C. AIM 2. SUPPORT THE MAINTENANCE AND RENEWAL OF THE LOCAL ECONOMY

Objection 529

Prudential Portfolio Managers

3.3.11. The Objection related to the final sentence of Paragraph 3.17, which was "Office development may be also acceptable on a limited number of sites within the Guildford urban area which are identified in Chapter 9". The Objectors view was that office development should not be restricted to identified sites. The Plan should allow for other opportunities which may arise during the life of the Plan. Appropriate criteria should be established to allow this to happen.

3.3.12. The Plan is following the lead of the adopted local plan and that of the Structure Plan. Recognising the stable nature of the Borough's population and the low levels of unemployment the priorities for maintaining the economy are the retention of existing employment land, the promotion of redevelopment and confining extension of employment uses to specified sites, unless there was a particular identified need that was not met by this approach. Any loosening of this policy could lead to an over-provision of employment land, with attendant pressures on the local labour supply and housing provision.

3.3.13. I noted that the suggested uses for some of the identified Guildford Town Centre development sites were the subject of proposed changes that would allow some office development. In the light of the Structure Plan policies and the absence as far, as I was aware, of a specific need for more office space in the Plan area, I did not consider that it would be appropriate to suggest a Policy on the lines the Objectors required.

Objection 1645

Country Landowners Association

Objection 1844

CPRE Surrey

3.3.14. The first Objectors suggested that the rather brief Paragraph 3.19 could be improved if it were to read:-

"The Plan recognises and supports the particular needs of existing and developing small and medium sized businesses many of which are rurally based and hold the key to ensuring that our rural areas do not decline further but provide vibrant communities in which to live and work".

3.3.15. CPRE were of the view that paragraph 3.19 was superfluous.

3.3.16. In answer to the second Objection, the Council considered that the importance of existing businesses, large and small, urban and rural, to the local economy merited their

specific mention at this point in the Plan. CPRE appeared subsequently to accept this. I agreed with the Council that the suggestion of the Country Landowners Association was tending to skew a general statement too far towards rural and social considerations. As the Council said, the importance of small and medium sized businesses, and those in rural areas, is recognised in later Chapters of the Plan.

3.3.17. Even so, I was in some doubt as to just what Paragraph 3.19 was conveying. The Council might consider rewording on the lines of the Recommendation.

CHAPTER 3. RECOMMENDATION 3.

3.3.1. That Paragraph 3.19 be changed as follows:-

THE PLAN RECOGNISES THE CONTRIBUTION OF EXISTING BUSINESSES AND WHERE PRACTICABLE WILL ENDEAVOUR TO MEET THEIR NEEDS, INCLUDING THE NEEDS OF SMALL FIRMS AND BUSINESSES IN RURAL AREAS.

D. AIM 3. PROTECT AND ENHANCE GUILDFORD'S TOWN CENTRE ROLE AS A REGIONAL SHOPPING CENTRE AND AS A FOCAL POINT OF COMMERCIAL, ARTS, CULTURAL AND ENTERTAINMENT FACILITIES

Objection C279
Objection 752

CPRE Surrey
The Guildford Society

3.3.18. Both Objections related to Paragraph 3.20, the gist of which was that apart from the extension to the Friary Centre, which has planning permission, no significant additional retail floorspace was proposed during the Plan period, although proposals which enhanced and supported the shopping role would be supported.

3.3.19. The first Objection was a concern that "enhancement" of the town centre should not be at the expense of local shopping facilities. These were of importance in restraining the growth of car use as well as a convenience to people in their communities. There should be a statement that a balance of town centre and local shopping would be maintained.

3.3.20. The Objector's point was to my mind met in Chapter 8, Shopping, particularly in Paragraph 8.4. It also appeared to me that Aim 5 was expressing the same objective of the provision, or retention, of a wide range of facilities at local level. I saw no very strong reason to qualify the Aim directed to Guildford Town Centre as suggested.

3.3.21. The second Objector sought a specific statement of the percentage of retail development which would be considered acceptable once the Friary Centre extension went ahead. It was noted that the extension of the Friary Centre would represent an increase in town centre retail floor space of about 20%. "No significant additional shopping floorspace

is proposed during the Plan period" was not thought to carry the necessary precision. In the circumstances it would be preferable for the Plan to say that "The Plan requires no floor space additional to that which the extension would provide during the Plan period although proposals which enhance ... will be favourably considered". The meaning of "enhancement", it was thought, required clarification and to be consistent with Policies 99S1 and 99S2.

3.3.22. The Council drew attention to the guidance of PPG6, which among other things indicated that it was not necessary to prove a quantitative need for shopping development within a town centre. A percentage limit on further growth in the Plan period would be contrary to the advice. It would not be appropriate to include among the Aims an indication that further retail development would be resisted; better in my view is the approach used by the Plan to state the sequential tests to be used in locating any new shopping developments that came along and the criteria which would be applied in considering proposals, as is done in Chapter 8.

Objection 530

Prudential Portfolio Management

3.3.23. The Objection was to the statement in Paragraph 3.22 that while office development will continue to be allowed in Guildford Town Centre this will be primarily on existing employment sites. It was considered that that was too inflexible, but it was a reflection of the Structure Plan and, having regard to the proposals for the Town Centre, I did not see it as unduly onerous or inflexible, not ruling out office development on sites in other uses.

E. AIM 4. TO PROTECT AND ENHANCE THE QUALITY OF THE URBAN AND RURAL ENVIRONMENT.

Objection 1295

Surrey Wildlife Trust

Objection 1846

CPRE Surrey (CW)

3.3.24. The Surrey Wildlife Trust asked that an Aim should be included:-

"To protect and increase the biodiversity of the Borough".

In a later Objection this was suggested as a measure of the effectiveness of the Plan. I agreed with the Council, however, the Aim as presented could be seen to be saying the same thing and suggested no change.

3.3.25. CPRE asked for an addition to Paragraph 3.27, by which developments taking place in the villages or the countryside would be expected to be "well designed". It was suggested that they should also be "in context and of appropriate scale". The Council proposed that this addition be made (PC9), a change I support.

CHAPTER 3. RECOMMENDATION 4.

3.3.2. That PC9 be made.

F. AIM 5. REDUCE THE DEMAND FOR TRAVEL BY CAR.

Objection 753

The Guildford Society (CW)

Objection 875

Guildford Environmental Forum (CW)

3.3.26. Both Objectors considered that there should be reference to the Road Traffic Act 1997, notably that mention should be made of targets for the reduction in traffic or the rate of traffic growth.

3.3.27. The Council pointed out that the County Council was the highway authority, but accepted that mention of this legislation was required. It was suggested that a better place in the Plan would be Chapter 7, Movement, and proposed PC64 and PC67 to make this addition to Paragraph 7.4. The Objectors were content to withdraw their Objections, conditional on these changes being made.

Objection 516

Guildford Diocesan Board of Finance

3.3.28. On behalf of the Objectors it was submitted that the Aim was expressed too simply. While the Aim could be generally supported, it was car commuting that created most problems of pollution, congestion and adverse impact on the environment. It was in Guildford's interest not to deter the many visitors who contributed significantly to the local economy, particularly in the Town Centre. The encouragement of the use of public transport and other alternatives to the car was supported, but there should be emphasis on the provision of additional short term parking space for shoppers and tourists.

3.3.29. The Council saw the Aim as expressing the general intention of the Plan, developed in greater detail in Chapter 7. In that Chapter questions of the balance between the provision of short term and commuter car parking are considered and translated into Policies. The need to maintain short term while curbing long term parking was acknowledged.

3.3.30. I accepted the Council's view that Aim 5 was accurately presenting the thrust of the Plan in relation to car use in general, as one of the elements of sustainability. There was acceptance that this would need refinement, and a consideration of the different priorities. Chapter 7 appeared a better place to develop the Aim to objectives and Policies.

Objection 1847

CPRE Surrey

3.3.31. The Objection was concerned to strengthen the wording of Paragraph 3.30. The high car ownership in the Borough, together with the traffic congestion that already existed suggested that traffic reduction should be a primary aim, even if the objective could not be achieved within the Plan period alone. The wording of the Paragraph implied that it was only further traffic growth, not the present situation, that was causing environmental problems. For major new development, that there was, or would be, adequate public transport and provision for pedestrians and cyclists were vital criteria. It was proposed that the first sentence of the Paragraph and "in full" in the second sentence be deleted, while the final sentence should be changed to say "allowing major travel generating development only

in locations with appropriate public transport provision and convenient cycling and walking access".

3.3.32. I accepted that much that this Paragraph, and those that followed, was saying was factual, or a reasonable summary of what the Plan was seeking to achieve within the limitations of its time span and the opportunities for change that would be likely to occur. It was making the important point that all demands for car use could not be met and that in the future this would be increasingly the case.

3.3.33. I considered the suggested changes and could see the Objector's points, but not that anything would be gained by omitting the first sentence. The second sentence was not, perhaps, conveying quite what was meant, seeming to relate only to the anticipated growth mentioned in the first sentence. As CPRE suggested, there is a need to convey that present traffic levels cause severe environmental damage and that increases could, even if practicable, for this reason be unacceptable. I have not suggested a substitute wording.

Objection 541

Prudential Portfolio Managers

3.3.34. The Objection considered that reference should be made in Paragraph 3.31 to a need to restrict car parking on development only where viable alternative forms of transport exist, or are likely to exist. It was suggested that the Paragraph should read :-

The availability of parking can influence the use of the car and where appropriate, once public transport improvements have been made, and having regard to the viability of the town centre, to restrict the provision of car parking in new development so as to encourage the use of alternative modes of transport. The provision of Park and Ride serving Guildford Town Centre is a high priority".

3.3.35. The Plan acknowledged that there was a relationship between the provision of parking and of public transport and other alternatives to the car. The Council saw a statement such as this as underplaying the role that parking standards could have in encouraging greater use of public transport.

3.3.36. The Aim is directed to the Plan area as a whole, not simply Guildford Town Centre, although, that being the part of the Plan area where access by public transport is well provided and congestion already a problem, it would seem to be the area where such a policy approach would be appropriate as well as practicable. Parking standards would, as the Plan indicates, provide an effective tool for putting the policy into effect. I accepted that at this point of the Plan a robust approach is appropriate.

CHAPTER 3. RECOMMENDATION 5.

3.3.3. That PC64 and PC67 (Chapter 7) be made.

3.3.4. That further consideration be given to the wording of Paragraph 3.30, as suggested in paragraph 3.3.33 above.

- G. AIM 6. MAKE THE BEST USE OF SCARCE LAND RESOURCES MINIMISING THE IMPACT OF DEVELOPMENT ON GREENFIELD SITES.

3.3.37. This Aim, very much in tune with current Government advice, elicited only support.

- H. AIM 7. ENCOURAGE AND FACILITATE ACCESSIBILITY TO THE BUILT AND NATURAL ENVIRONMENT FOR ALL SECTORS OF SOCIETY.

3.3.38. This Aim, the purpose of which was described in the supporting Paragraph as essentially to provide access for those of limited mobility to buildings, open space and the countryside appeared to attract no responses, not even the support that might have been expected. The Aim is well developed in later Policies, but its wording here might have been more direct, perhaps on the lines of the Recommendation.

CHAPTER 3. RECOMMENDATION 6.

- 3.3.5. That Aim 7 be reworded:-

ENCOURAGE AND FACILITATE ACCESS TO PUBLIC PLACES, INCLUDING BUILDINGS, FOR THOSE WITH LIMITED MOBILITY.

- I. AIM 8. RECOGNISE THE IMPORTANCE OF LOCAL COMMUNITIES WITHIN THE BOROUGH BY PROMOTING LOCAL IDENTITY AND THE PROVISION OF A WIDE RANGE OF FACILITIES AT THE LOCAL LEVEL.

3.3.39. This Aim also attracted only support.

- J. AIM 9. PROTECT THE GREEN BELT AND THE COUNTRYSIDE BEYOND THE GREEN BELT AND PROTECT THEM FROM INAPPROPRIATE DEVELOPMENT.

Objection 758

Objection 1294

Objection 1646

Objections 1848, C67, C68

Objection C33

Objection C240

The Guildford Society

Poulson and Son

Country Landowners Association

CPRE (Surrey)

Horsley Countryside Preservation Society

Mrs Killick

3.3.40. The Objections raised a number of points, mainly relevant to Policies in the later Chapters of the Plan. Among them was the suggestion that the wording of the Aim should reflect the different emphasis on countryside protection in the Green Belt and the

countryside areas beyond the Green Belt. I agreed with the Council that in this Aim the protection was for all the countryside of the Plan area. The Plan makes no real distinction in that respect between the countryside of the Green Belt or that beyond, if there may be other implications. The Aim would be better expressed making this apparent. I therefore supported the suggested rewording of PC10.

3.3.41. Two Objectors were concerned at the mention in Paragraph 3.38 of the proposals of the Plan to remove land at Manor Farm from the Green Belt to facilitate expansion by the University of Surrey. I saw no gain in removing the reference from this part of the Plan. It is the only significant change proposed to the Green Belt and the only major proposal of the Plan affecting greenfield land. The question of whether a part of the Manor Farm site might remain in the Green Belt is returned to in consideration of Objections to the Proposal in Chapter 16.

3.3.42. Objections to Paragraph 3.40 drew attention to the restrictive nature of the phrase "Development which would affect the rural character of the area". It was said that the countryside was constantly changing and what was undesirable was development that was detrimental. There was, however, support for the greater protection the original wording might afford.

3.3.43. The Council proposed that "detrimentally" be added (PC11). PPG7 acknowledges that not only will the countryside continue to change, but that it can accommodate many forms of development, to which the Plan should take a positive stance. It is changes that would be damaging to rural character with which the Plan should be concerned and the intentions of the Plan in this respect are well expressed in the Green Belt and countryside Policies. I considered that the suggested change should be made.

CHAPTER 3. RECOMMENDATION 7.

3.3.6. That PC10 be made.

3.3.7. That PC11 be made.

K. AIM 10. SUPPORT THE PROVISION OF HIGH QUALITY RECREATIONAL, TOURIST AND COMMUNITY FACILITIES IN THE BOROUGH.

Objection 1849

CPRE Surrey (CW)

3.3.44. The Objection was to the traffic generation implications of increased tourism, which in the rural areas was already diminishing the amenities that were the principal attractions. The Objector was satisfied that changes proposed in other parts of the Plan would meet the point.

CHAPTER 4. GENERAL POLICIES

1. INTRODUCTION

4.1.1. The two Paragraphs of the Introduction to the Chapter attracted no specific Objections. The Chapter set out the general policies against which all planning proposals are to be assessed, although in defined parts of the Plan area, or in respect of particular sorts of development other Policies of the Plan will also apply. In addition, the Chapter included the Policies related to matters of design, advertisements and some other matters which, perhaps, it was felt did not fit easily into the more specific topic chapters which follow.

4.1.2. The Chapter expanded substantially on the similarly titled chapter in the adopted plan. Most of the Policies, nevertheless, had their antecedents in the adopted plan, particularly in the Built Environment Chapter. There had also been some widening of the scope of the Plan, reflected in the rather lengthy and complicated form of this Chapter, coming in part from the emphasis on "sustainability" and in part from the advice of Government as to the matters that should be treated in the Plan. One such matter is "Design" which now figures prominently in the advice of PPG1. A further factor which was evident from the responses to the Plan was an even keener concern of people for the local environment.

2. GENERAL STANDARDS OF DEVELOPMENT.

POLICY 99G1

4.2.1. The Policy indicates that proposals for development will be permitted if they comply with the eleven requirements which follow, in so far as they are appropriate to the development in question, and to such other Policies as may be relevant. There were no Objections to the Policy as a whole, only to the separate "requirements". The Clauses are considered individually.

99G1(1). PARKING PROVISION

Objectors

<i>Objection 230</i>	<i>GOSE (CW)</i>
<i>Objection 240</i>	<i>Cranley Road Area Residents Association (CW)</i>
<i>Objection 440</i>	<i>Highways Agency</i>
<i>Objection 531</i>	<i>Prudential Portfolio Managers</i>
<i>Objection 876</i>	<i>Guildford Environmental Forum</i>
<i>Objection 1073</i>	<i>Sainsburys Supermarkets Ltd</i>
<i>Objection 1229</i>	<i>McCarthy and Stone (Developments) Ltd</i>
<i>Objection 1278</i>	<i>Robert Shaw and Partners</i>
<i>Objection 1768</i>	<i>Consortium of Registered Social Landlords</i>
<i>Objection 1797</i>	<i>Mr A E Rees</i>

Background, Objections and Issues

4.2.2. This Clause of the Policy made the principal requirements of the Plan for car parking for new development to be provided in accordance with laid down standards. The standards themselves, originating with Surrey County Council, were included in Appendix 1 of the Plan. The Clause was augmented by a section headed "Parking Policy" in Chapter 7, Movement, where more was said about parking standards for new development (including reference to Appendix 1), the management of parking and the provision of Park and Ride. There were Policies relating to parking provision in Guildford Town Centre (Policy 99M4), to which the Clause referred, and Park and Ride sites (Policy 99M5).

4.2.3. The Objections raised a number of general points. Among them were that the standards should refer to PPG13 and the White Paper on the Future of Transport. It was queried whether the standards should be presented as a part of the Policies of the Plan, or be Supplementary Planning Guidance, capable of being changed, if need be, during the Plan period without requiring review of the Plan. There was Objection that the standards were not sufficiently restrictive, and that they were inflexible, not permitting parking provision in excess of the standards in circumstances where it might be appropriate.

4.2.4. More particular Objections were that the standards proposed for housing should be reduced for affordable housing and for sheltered housing for the elderly. There was a suggestion that all commercial developments should provide adequate parking space for employees.

4.2.5. The Proposed Changes proposed substantial alterations to the Policy and its supporting paragraphs, and also to the Parking Policy section of Chapter 7. Policy 99M4 was proposed to be moved from Chapter 7 to this Chapter, leaving Chapter 7 only with policy relating to Park and Ride. They also incorporated the latest policy initiative and parking standards promoted by Surrey County Council, changing Appendix 1. The main issue was whether the Policy was accurate and properly expressed.

Consideration

4.2.6. The Proposed Changes met some of the initial Objections. For example, there was acceptance by the Council that the standard for sheltered accommodation should be reduced, to 0.5 space per dwelling. I accepted, as apparently had the County Council, that the age level of occupiers and their likely levels of car ownership and use justified a lower standard. I accepted also that a lower standard for affordable housing was not appropriate, car ownership and use being unlikely to be significantly lower than in other housing types.

4.2.7. Among the objectives of the control of parking space being the restraint of the use of the car, particularly for commuting journeys, the amounts of parking provided for employees should in general be limited, and the standards seen as maxima, in order to encourage the use of public transport, walking or cycling. Similarly, for the Policy to allow parking provision in excess of the standards "where appropriate" would beg the question as to when it would be appropriate and require the Policy to give an indication. Should there

be circumstances when this were required an exception to the Policy could no doubt be made. Otherwise it does not seem necessary to add this degree of laxity to what of necessity is now a key Policy towards sustainability.

4.2.8. Whether the reasoned justification to this part of the Policy should refer to PPG13 or other Government policy statement is a moot point. Parking policy is an element of Government policy and advice, but that seems clear from the Plan in general, while PPG13 will be referred to in the new Appendix listing PPGs. One indication that does appear to come from PPG13 is that parking standards should be incorporated in the Plan, rather than be Supplementary Planning Guidance, although I would accept that views on this have varied over the years.

4.2.9. The considerable changes made to this clause attracted in turn a number of Counter-Objections.

Objectors

<i>Objection C69</i>	<i>CPRE Surrey</i>
<i>Objection C256</i>	<i>HBF</i>
<i>Objection C257</i>	<i>Mrs Fenton</i>
<i>Objections C261-2</i>	<i>Sainsburys Supermarkets Ltd</i>
<i>Objection C268</i>	<i>University of Surrey</i>
<i>Objections C273-5</i>	<i>Surrey County Council</i>

Background

4.2.10. The proposed changes to the Clause indicated that in the Town Centre, by which I assumed was meant the Town Centre Parking Area, the only boundary for the Town Centre shown on the Proposals Map, levels of on site parking would be restricted and there would be an expectation that developers would make contributions towards public transport, pedestrian and cycling related facilities and park and ride schemes. This came from Policy 99M4.

Consideration

4.2.11. Objectors were concerned that the wording as revised would preclude contributions from developments outside the defined Town Centre. This was a feature of Policy 99M4, although Policy 99M3 would allow contributions to be sought from developments in other locations which generated significant trip volume. More fundamental was the impression given by the revised Policy that the expectation of contributions was not in accordance with Government advice. This the Council accepted and put forward an alternative phrase which I have included in the Recommendation.

4.2.12. The Proposed Change (PC225) indicated that in Guildford Town Centre, where there was "a high level of public transport accessibility it will be more appropriate for developers to provide improvements to public transport, park and ride facilities, walking and cycling instead of on-site parking". Accordingly, parking provision would be limited to

between 0% and 25% of the standards. Objectors saw this as working against the objective of Policy 99M4, which in its deposited form restricted parking provision to operational needs, while putting pressures for development and car parking on areas outside the Town Centre. These were obvious dangers, but they appeared to have been taken into account in Policy 99M3, as proposed to be changed, by which contributions may be sought from developers in other locations towards public transport, etc., improvements. The proposed changes to the reasoned justification explained also that problems created by further on-street parking would be taken into account, local residents and business interests being consulted.

4.2.13. There was support for the standards for cycle parking, but a request that the standards be increased in respect of Class A3 uses. Surrey County Council had considered the standard adequate. It may, indeed, be reviewed in the future, although at the moment there appeared to be no reason to suggest a change. The wording proposed for the changed Paragraph 4.3 suggested to Objectors that the standards for residential car parking were to be seen as minima, even in the Town Centre. The Council accepted that this was not the intention and put forward an additional sentence that would make it clear that the standards applied as minima, except in the Town Centre. The sentence is included in the Recommendation.

4.2.14. The intention to reduce parking provision in new developments in the Town Centre was questioned. However, the zonal approach of the Plan came from the County Council's Parking Strategy and was reflecting Government advice. The intention to restrict parking in locations where there were good public transport, walking and cycling facilities available was a reflection of the objective of working towards sustainability. The approach had been applied by the adopted plan and had had no noticeable harmful effects on the vitality or viability of the Town Centre.

4.2.15. Proposed Change PC12 proposed that Paragraph 4.4 be changed to read that within the Town Centre only operational parking would be allowed. This corrected an error in the Deposited Plan. PC225, however, further changed the Paragraph, removing the reference to operational parking. CPRE was concerned that the initial change could add pressures for commercial vehicles to park overnight outside the town Centre. The need for secure parking space that could overcome this problem was noted.

4.2.16. Surrey County Council asked for changes to the new Paragraph 4.4 proposed by PC225 to include reference to the submission of Transport Assessments by developers in the Town Centre to assess the likely nature and scope of contributions towards transport improvements. As proposed, the sentence referred only to the Council developing this approach and preparing guidance, in consultation with the County Council. The Council preferred this wording, on the basis that smaller schemes of development might not require a Traffic Assessment and would appear by the revised wording to also be excluded from making contributions. I could accept that.

4.2.17. The Proposed Changes substantially modified the way in which the policy of the Plan for controlling parking and supporting the provision of alternatives to the use of the car was presented. In the Plan as deposited, this Clause introduced the car parking standards, and drew attention to the specific Policy relating to parking provision within Guildford Town

Centre. The section of the plan dealing with parking policy, including headings for Parking Standards for New Development, Management of Parking Provision and Provision for Park and Ride, together with Policy 99M3, relating to major traffic generating developments, Policy 99M4, the provisions for Guildford Town Centre and Policy 99M5, Park and Ride, were in Chapter 7, Movement.

4.2.18. Following the Proposed Changes, Policy 99M3 would be in this Chapter, Chapter 4, together with a new Policy relating to Green Transport Plans, in substitution for the reference to Company Transport Plans in Policy 99M3. Chapter 7 retained the section on Parking Policy, but only Policy 99M4, revised to relate to long stay parking in Guildford Town Centre, and Policy 99M5, Park and Ride Sites.

4.2.19. The result appeared to be something of an overloading of this Clause, while the policy as a whole was not accessible in one place. There seemed also to be some repetition in the reasoned justifications, perhaps necessary in the circumstances, but adding to the length of the Plan without greatly aiding its clarity. In my view, the first thoughts were to be preferred, a section in the Movement Chapter where the different aspects of parking policy were grouped together, with this Clause restricted in its scope to making the requirement that developments should conform to the parking policy. Chapter 7 itself could include a Policy on the lines of clause 99G1(1) to bring the Parking Standards of Appendix 1 into Policy. The reasoned justification could be made shorter and direct readers to Chapter 7.

CHAPTER 4. RECOMMENDATION 1.

4.2.1. That PC225 be made, subject to the following further changes:-

(a) The second paragraph of Clause 99G1(1) be worded:-

WITHIN THE TOWN CENTRE PARKING BOUNDARY AS IDENTIFIED IN THE PROPOSALS MAP THE COUNCIL WILL RESTRICT LEVELS OF ON-SITE PARKING. IN SUCH CIRCUMSTANCES IT WILL SEEK FROM DEVELOPERS APPROPRIATE CONTRIBUTIONS TOWARDS PUBLIC TRANSPORT ...

(b) In Paragraph 4.3 be added:-

THE RESIDENTIAL STANDARDS ARE MINIMUM STANDARDS EXCEPT IN GUILDFORD TOWN CENTRE WHERE THEY WILL BE APPLIED AS MAXIMA.

4.2.2. That consideration be given to reordering the Policies and supporting Paragraphs in this Chapter and Chapter 7 as suggested in paragraph 4.2.19 above, this Clause of the Policy being worded:-

PARKING FOR MOTOR VEHICLES IS PROVIDED IN ACCORDANCE WITH THE PARKING POLICY AND PARKING STANDARDS OF THE PLAN SET OUT IN CHAPTER 7 AND IN APPENDIX 1.

4.2.3. That the parking standard for sheltered housing be changed to 0.5 space per dwelling.

99G1(2) TRANSPORT PROVISION, ACCESS, HIGHWAY LAYOUT AND CAPACITY

Objectors

Objection 441

Highways Agency (CW)

Objection 911

Howard Hutton and Associates (CW)

Consideration

4.2.20. The Highways Agency suggested additions to Paragraph 4.6. to refer to:-

- (a) The Highway Agency's policy in relation to proposals for development adjacent to Trunk Roads and Motorways, set out in Circulars (Roads) 4/88 and 6/91.
- (b) The White Paper "A New Deal for Roads in England 1998", which also advised on development near Trunk Roads.
- (c) The advice on development control in PPG13, paragraph 6.1, concerning the maintenance of safety and the free flow of traffic.
- (d) The requirement of the Agency for Traffic Impact Assessments for all but the smallest developments proposed adjacent to Trunk roads.

4.2.21. The Council agreed that such additions should be made and they were incorporated in PC13 and PC72.

4.2.22. Howard Hutton and Associates were concerned that Paragraph 4.6b was not reflecting Government advice that contributions from developers towards improvements to the highway network were only appropriate where the need arose from the development. The Council suggested an appropriate change in PC13. In both instances the Objectors were prepared to withdraw their Objections, subject to these changes being made. I recommend that they are made.

CHAPTER 4. RECOMMENDATION 2.

4.2.4. That PC13 and PC72 be made.

99G1(3) PROTECTION OF AMENITIES ENJOYED BY OCCUPANTS OF BUILDINGS

Objection 2053

GOSE

4.2.23. This Clause represents a general policy for the protection of the amenity of occupiers, regardless of the use of the land or buildings protected, listing the most likely causes of loss of amenity. The Clause is augmented, or it purposes repeated, in other Policies of the Plan, particularly in Chapter 5, but in other Chapters also. GOSE was concerned that some of the dangers to amenity mentioned were the subject of controls under other legislation. That is so, but I agreed with the Council that these are the greatest potential threats, they have long been a concern of planning when new development is proposed and are reasonably mentioned here.

Objection 1721

The Hospital of the Blessed Trinity, Guildford (Abbots Hospital)

(Also considered are Objections 1722-1725)

Background, Objections and Issues

4.2.24. The concerns of the Abbots Hospital to threats to residential amenity were more direct. The Hospital is situated prominently in Guildford Town Centre. It is an important listed building (Grade 1) and with Trinity Church opposite it forms a distinctive precinct, which contributes greatly to the character and appearance, and to the history, of the Town Centre. The Objectors recognised that there were Policies in the Plan to protect the fabric of the Hospital and the adjacent older buildings that were its setting. However, their particular concern was that the Hospital provided homes for elderly people and in a town centre location there was a need for reassurance that the quality of the setting and the pleasant residential environment would be maintained.

4.2.25. It was pointed out that the Plan (Paragraph 4.8) used the Hospital as an example of an existing residential use under threat from the development of leisure and social facilities in its vicinity. The Paragraph went on to say that "For this reason, such established residential uses of this nature require special protection". The Objectors saw this not simply as recognition of the pressures from Town Centre uses that were threatening the amenity of the Hospital, but as foreshadowing the inclusion of a specific Policy to protect the Hospital, or to protect residential uses in the Town Centre. In the event, only this clause, Policy 99S5 and various Policies of the Historic Environment Chapter were available, Policy 99S5 only dealing with the problems which can arise from changes of use from Class A1. The Policies of the Historic Environment Chapter, protecting the historic fabric, did not extend to residential amenity and the potential impact of Class A3 uses. The appropriateness of Class A3 and evening leisure uses in the vicinity of the Hospital needed particular consideration.

4.2.26. On behalf of the Hospital an additional Policy was proposed to relate specifically to Abbot's Hospital and Trinity Churchyard:-

"Developments including changes of use and proposals for the variation or removal of planning conditions relating to existing premises which may affect the environs of Abbot's Hospital and Trinity Churchyard will be critically examined. In particular, all proposals should have regard to the setting of these buildings and the need to protect the residential use of Abbot's Hospital as a home for the elderly. In particular, the Council will resist new Class A3 or other noisy uses or the intensification of the activity of such existing uses which will adversely affect the residential amenity of Abbott's Hospital and the precincts of the Churchyard".

4.2.27. A suggested addition to Paragraph 4.8 was "... such established residential uses of this nature require special protection, particularly from changes of use which may adversely affect amenity through noise and disturbance" was accepted by the Council (PC14). Other additions were also suggested.

(a) to Paragraph 4.24, supporting Policy 99G1(11), Mixed Use:-

"Proposals that adversely affect the residential amenity of Abbot's Hospital will be resisted".

(b) to Paragraph 8.21 supporting Policy 99S5 (Guildford Town Centre Secondary Shopping Areas):-

"The environs of Abbot's Hospital in particular is an area where further changes of use to food and drink premises (Class A3) will be resisted in view of the need to protect residential amenity".

(c) to Paragraph 11.18, the reasoned justification of Policy 99HE6, New Development Which Affects the Setting of a Listed Building:-

"New uses can also have a harmful effect not only on the fabric of Listed Buildings but on the amenity and setting of such buildings. Proposed uses will therefore be considered critically in the light of their effect on listed buildings".

4.2.28. The need for the Plan to protect this important group of buildings, their setting and the environment that allows this long established charitable residential use to continue in the Town Centre was recognised by the Council and I had no doubt would be supported by the great majority of the people of Guildford. That the Hospital has suffered from popular recreational uses in its vicinity was also apparent. The principal issue was whether the Plan as it stood would provide sufficient protection to the setting and the amenity of the Hospital and the neighbouring Trinity Church for the future.

Consideration

4.2.29. Abbot's Hospital and Trinity Church are Grade 1 Listed Buildings and lie within the Town Centre Conservation Area. The Hospital is essentially a residential complex, incorporating some very attractive open courts, but closely surrounded by other more normal town centre commercial and retail development. The Church closely adjoins the High Street,

but the Churchyard behind forms another largely enclosed court, in part faced by residential buildings.

4.2.30. That being said, while distinctive, this group of buildings is not the only group of quality in the Town Centre, nor are these the only residential enclaves and similar groups and mixes of uses occur in other Conservation Areas. The problems of the impingement of other uses which may not always be the best neighbours for residential occupiers are not confined to this situation, if given particular point here. The need is for the Plan to provide a basis of policy to provide appropriate protection wherever there is the possibility of a conflict that could disadvantage the continuance of residential occupation.

4.2.31. There are many references in the Government's planning guidance to the needs to protect Listed Buildings, Conservation Areas, residential amenity and to preserving and encouraging residential use in town centres. The Objectors argued for changes to the Plan that would give specific protection to the environment of the Hospital and the Churchyard and could find references which could reasonably be seen to support their case. Attention was drawn to policies included in the Deposited Chester City Local Plan and the adopted Winchester District Local Plan.

4.2.32. My own view was that the need was to ensure that the Plan provided adequate protection for residential amenity in general and that site specific policies to protect amenity in particular situations should not be necessary. I noted the advice of PPG12 that this was generally the approach to be preferred. The two policies of other authorities drawn to my attention appeared to relate to the impact of changes of use on the character and appearance of Conservation Areas in general, rather than to more closely defined parts of those Cities, even if it can be assumed that it was the town centres in which there would be likely to be most concern.

4.2.33. This Clause of Policy 99G1 appeared to provide an adequate and robust statement of the intention to protect the amenity of occupiers from the adverse affects of unneighbourly development. PC14 would add a little greater emphasis in so far as residential occupiers were concerned and the Hospital in particular. It did not appear to me that the protection of the Hospital or the residents around the Churchyard would be better protected by the policy suggested.

4.2.34. Equally, I saw no need to make an addition to the supporting paragraphs of Policy 99G1(11). Paragraph 4.24 makes mention of town centre residential uses and of the residential uses of the Hospital, recognising their vulnerability and the need for particular attention to be paid to their protection.

4.2.35. The additions proposed to the reasoned justification of Policy 99S5 was intended as a safeguard should other Class A1 uses in the vicinity of the Hospital be proposed for Class A3 uses. The particular problem of such uses in this area it was thought would be highlighted thereby in the Policy those considering such changes might first consult. As Policy 99S5 has among its criteria "The use does not result in loss of amenity in terms of noise, disturbance, smell, litter or traffic generation" and this is not enlarged upon in the reasoned justification, some such addition, broadened to have wider as well as a specific

application would I consider be appropriate, even having regard to the references to be found elsewhere in the Plan.

4.2.36. The body of policy found in Chapter 11, Historic Environments, appeared comprehensive in its treatment of Listed Buildings and development in Conservation Areas. The policies follow the National guidance closely. I accept that in view of the legislative framework on which these Policies are necessarily based they should not be extended beyond what is clearly appropriate. Other matters, among which is protection of residential amenity, which was the Objectors prime purpose, it appeared, is best dealt with in other policies of the Plan.

CHAPTER 4. RECOMMENDATION 3.

4.2.5. That PC14 be made.

4.2.6. That the following be added to Paragraph 8.21:-

THE AMENITY OF RESIDENTS IN THE TOWN CENTRE WILL BE ALSO PROTECTED. THE ENVIRONS OF ABBOT'S HOSPITAL IN PARTICULAR IS AN AREA WHERE FURTHER CHANGES OF USE TO CLASS A3 USES WILL BE REGARDED IN THE LIGHT OF THE NEED TO SAFEGUARD RESIDENTIAL AMENITY.

99G1(4). ACCESS FOR PEOPLE WITH DISABILITIES.

Objector

Objection 2037

GOSE (CW)

4.2.37. The Objection was to the imprecise wording of the Policy. The Council proposed PC15, which would substitute a fuller wording, although it retained "Where appropriate", the phrase the Objector initially complained of, and introduced mention of pedestrians as well as people of impaired mobility.

4.2.38. I noted that the Objector was satisfied with the Proposed Change, but I considered that the original matter of concern remained and that the Clause would be more effective if "Where appropriate" was removed. Such phrases can reasonably be used in a plan policy, if there is adequate explanation. The explanation in this instance seemed to be that this is a general requirement for buildings to which the public will have access, making the phrase unnecessary.

4.2.39. Access for pedestrians is covered by Clause 2 of the Policy and the addition of this consideration detracts from the prime objective of the Clause given in its heading. I recommend that that also is omitted. While perhaps an unnecessary matter of semantics, the

title of the clause might refer to "people with impaired mobility", as does the Policy, rather than "people with disabilities".

4.2.40. Paragraph 4.11 in its deposited form included a reference in brackets to the anticipated extension of Part M of Schedule 1 of the Building Regulations to include new housing. That has taken place and a change to reflect this was proposed in PC53.

CHAPTER 4. RECOMMENDATION 4.

4.2.7. That in the title of the clause "PEOPLE WITH IMPAIRED MOBILITY" be substituted for "PEOPLE WITH DISABILITIES".

4.2.8. That PC15 be made, except that the following be omitted:-

(a) "WHERE APPROPRIATE";

(b) "PEDESTRIANS AND".

4.2.9. That PC53 be made.

99G1(5). CRIME PREVENTION

Objectors

Objection 560

Objection 1236

Mr I C Macpherson

Ash Parish Council

Objections and Issues

4.2.41. The Objection of Mr Macpherson was to the mention in Paragraph 4.14 that the Council did not consider that security gates at the entrance to residential development and other measures which restrict pedestrian access through and between housing areas is an appropriate solution to perceived problems of crime. Reference is made to Supplementary Planning Guidance to be prepared. The Objector's points were that there appeared to be no definitive work to support the contention of the Plan statement, and that in many instances such gates would be "permitted development".

Consideration

4.2.42. Whether such gates are "permitted development" will depend on their location and their height, and perhaps on what they replace. The statement in the Plan may well be the Council's view, and perhaps objective support for it is available which could be presented in the Supplementary Planning Guidance. As it stands, the statement has all the appearances of a policy and if it is to be retained it should be presented as one. However, such security measures have their proponents as well as actual disadvantages. It might be preferable at this time to make the statement less committal. A suggestion is in the recommendation.

4.2.43. The Parish Council asked for developers to be required to liaise with the Architectural Liaison Officer at Surrey Police Authority with a view to implementing the Crime Prevention Through Environmental Design Scheme. The Council agreed that it should be added that the Council would consult the Architectural Liaison Officer on larger applications, at the same time adding to the reference in Paragraph 4.13 to the Safer Guildford Initiative (PC16).

CHAPTER 4. RECOMMENDATION 5.

4.2.10. That the last two sentences of Paragraph 4.14 be omitted and the following substituted:-

THE COUNCIL WILL PREPARE SUPPLEMENTARY PLANNING GUIDANCE TO PROVIDE ADVICE ON THE USE OF SECURITY GATES AT THE ENTRANCE TO RESIDENTIAL DEVELOPMENT.

4.2.11. That PC16 be made.

99G1(6). FLOOD PROTECTION

Objectors

<i>Objections 370,377-8,380</i>	<i>Environment Agency</i>
<i>Objection C230</i>	<i>HBF</i>
<i>Objections 1427,C236</i>	<i>Thames Water</i>
<i>Objection 1524</i>	<i>Loseley Estate (CW)</i>
<i>Objection 1641</i>	<i>Mrs S Stevens (CW)</i>

Objections and Issues

4.2.44. The Objections to the Clause in its deposited form raised a number of points. They can be summarised as follows:-

(a) The Environment Agency:-

- (i) The Proposals Map did not show all areas that were subject to flooding;
- (ii) The Policy would not adequately cover developments which should be opposed because they increase the number of people living in the flood plain. The addition of a further phrase was suggested:-

"increase the risk to people or property from flooding".

A further paragraph clarifying the approach to dealing with flood risk was also suggested.

- (iii) A further Policy should be added:-

Sustainable Surface Water Drainage

Where appropriate surface water should be disposed of as close to source as possible or be attenuated before discharge to a watercourse or surface water sewer.

- (vi) A further Policy should be added:-

Protecting Water Quality

Where appropriate the development safeguards the quality of surface and groundwater resources.

For both proposed new policies, reasoned justifications were also suggested.

- (b) Thames Water

There should be a Policy relating to utility infrastructure requirements, as advised by PPG12.

- (c) Loseley Estate

Development in floodplains should be permitted, even if there is an increased risk of flooding, where it is possible to make appropriate alleviation or mitigation measures. Policy D12 in the deposit draft of the Waverley Borough Local Plan was seen as an example.

- (d) Mrs S Stevens asked for reference to the effects of global warming.

Consideration

4.2.45. The Council accepted the points made by the Environment Agency, proposing changes to the Clause and to the reasoned justification substantially as suggested by the Objector and the addition of the further areas liable to flooding notified by the Objector to the Proposals Map (PC17, PC18). These Proposed Changes did not include the new policies relating to surface water drainage or protecting water quality themselves, only drawing attention in the reasoned justification to the powers of the Environment Agency in these respects under the Water Resources Act 1991.

4.2.46. In response to the Objection of Thames Water, PC18 included a new Policy, I assumed as a further Clause to Policy 99G1:-

"Adequate utility infrastructure is in place to meet the needs of development".

A supporting paragraph was also proposed.

4.2.47. The Objector did not feel that this fully met the advice of PPG12, nor their Objection. In particular, it did not take account of the need for extending or constructing new works to provide the utility infrastructure that might be required, not all of such development necessarily being "permitted development". The PPG advised that utilities should be consulted as to their needs for land to meet the demands that would be placed upon them and the potential environmental effects of such development.

4.2.48. The Council said that the utility companies had been consulted in the preparation of the Plan and no specific needs for land had been put forward. It was considered that the framework of policy covering development in general would provide an adequate framework for the consideration of proposals for development that might be required by the utility companies. In the broad view that is probably so, but there are imperatives and geographical limitations to the provision of this sort of infrastructure which is recognised by PPG12 and, in my view, should have more specific treatment in the Plan. That could be satisfactorily achieved by adding a further part to the new Policy proposed by PC18. The Policy could take the form suggested by the Objectors, or a briefer wording such as that of Policy C15 of the Islington Unitary Development Plan. In the recommendation I have used a shorter form.

4.2.49. A further supporting paragraph would also be required. This could draw attention to the needs and limitations on the provision of utility services to support new development and improve existing services, but in meeting those needs regard will be had to environmental, amenity and traffic considerations, protection of the countryside and to the objectives of the Green Belt.

4.2.50. HBF objected to two matters in the Proposed Changes. The first was the sentence proposed to be included in Paragraph 4.15 by PC17, a sentence deriving from a suggestion by the Environment Agency. The sentence was:-

"If there are any overriding reasons for development to take place despite the risk of flooding, then appropriate flood protection and mitigation measures should be carried out."

This was thought, by implying that development can only take place in areas of flood risk in exceptional circumstances, to go beyond the guidance of Circular 30/92, the gist of which is that if there are adequate flood protection and mitigation measures development can take place in areas of flood risk. An alternative was suggested:-

"If development is allowed to take place despite the risk of flooding, then appropriate flood protection and mitigation measures should be carried out."

4.2.51. The second matter related to the apparent reference in the supporting paragraph to the proposed new Policy to consultation with the Environment Agency as well as the utility companies as to the sufficiency of utility services.

4.2.52. As to the first matter, although the wording of the Proposed Change was suggested by the Environment Agency, and bearing in mind their responsibilities no doubt reflects what they would wish the Plan to say, the guidance is better reflected by the HBF's suggested wording. I recommend that this be substituted in the Proposed Change. The second Objection also appeared well founded, but I was uncertain as to whether the new Policy was intended to take in matters of land drainage as well as the public utilities. If it were, the reference to the Environment Agency was appropriate, although the proposed new Policy would be clearer if this were said.

4.2.53. The Loseley Estate and Mrs Stevens were satisfied with the Proposed Changes and conditionally withdrew their Objections.

CHAPTER 4. RECOMMENDATION 6.

4.2.12. That PC17 be made, except that for:-

"IF THERE ARE ANY OVERRIDING REASONS FOR DEVELOPMENT TO TAKE PLACE DESPITE THE RISK OF FLOODING, THEN APPROPRIATE FLOOD PROTECTION AND MITIGATION MEASURES SHOULD BE CARRIED OUT."

be substituted

"IF DEVELOPMENT IS ALLOWED TO TAKE PLACE DESPITE THE RISK OF FLOODING, THEN APPROPRIATE FLOOD PROTECTION AND MITIGATION MEASURES SHOULD BE CARRIED OUT."

4.2.13. That PC18 be made, except that in the reasoned justification of the new Policy proposed either

"... THE ENVIRONMENT AGENCY AND"

be omitted, or the Policy be changed to

"ADEQUATE LAND DRAINAGE AND PUBLIC UTILITY INFRASTRUCTURE IS IN PLACE ...".

4.2.14. That a new Policy be added:-

THE DEVELOPMENT OF NEW UTILITY INFRASTRUCTURE INCLUDING THE EXTENSION OF FACILITIES OR WORKS WILL BE PERMITTED WHERE SUCH DEVELOPMENT IS IN ACCORDANCE WITH THE POLICIES OF THE PLAN.

and that an appropriate reasoned justification be provided.

99G1(7). LIGHT POLLUTION

Objectors

<i>Objection 442</i>	<i>Highways Agency</i>
<i>Objection 1197</i>	<i>National Trust</i>
<i>Objection 1344</i>	<i>Councillor N Sutcliffe</i>
<i>Objection 1850</i>	<i>CPRE Surrey</i>

Objections and Issues

4.2.54. The Objections were concerned with the scope and precision of the Policy and of the paragraph of reasoned justification. The Council proposed to meet the Objection of the Highway Authority that there was a need to prevent light spillage and glare from developments affecting traffic on Trunk Roads. An addition to the Policy would avoid distraction to all road traffic (PC19).

4.2.55. The National Trust pointed out that high levels of interior lighting can also be visually intrusive, particularly on rural sites, and sensitive design, siting and orientation of new buildings was required. An addition to the Policy was suggested:-

"New development is designed to minimise light pollution from interior lighting ...".

4.2.56. Councillor Sutcliffe suggested a more detailed control of external lighting than provided by the Policy, setting out eight requirements which should be met. CPRE supported the Policy, but asked to be consulted on the Supplementary Planning Guidance proposed in Paragraph 4.16.

Consideration

4.2.57. The point made by the National Trust was, I felt, a general one which would come among the many matters which should be considered in achieving a satisfactory design in new development. The Trust's concern was primarily internal lighting which is not open to more direct control. Councillor Sutcliffe's points were all relevant and would be appropriate for consideration in the proposed Supplementary Planning Guidance. They appeared to be too detailed for the Policy itself, but pointed to one weakness of the Policy. It did not define "light pollution", while reference to "indiscriminate floodlighting and insensitive use of exterior lighting" might be thought too imprecise and too narrow an approach.

4.2.58. My suggestion is that the Clause is worded as in the recommendation. The supporting paragraph could include in place of the first sentence my further recommendation.

CHAPTER 4. RECOMMENDATION 7.

4.2.15. That PC19 be made subject to the following changes:-

(a) The Clause is worded:-

EXTERNAL LIGHTING IS DESIGNED TO MINIMISE GLARE AND THE SPILLAGE OF LIGHT FROM THE SITE AND TO AVOID DISTRACTION OF ROAD TRAFFIC.

(b) Paragraph 4.16 is worded:-

LIGHT POLLUTION OCCURS WHEN UNWANTED LIGHT SPILLS FROM A SITE TO ILLUMINATE NEIGHBOURING LAND AND BUILDINGS AND IS REFLECTED IN THE NIGHT SKY. THIS CAN BE ENVIRONMENTALLY DAMAGING, PARTICULARLY IN RURAL AREAS. IT CAN ALSO BE A HAZARD TO ROAD TRAFFIC AND IT IS PARTICULARLY IMPORTANT TO PREVENT LIGHT SPILLAGE AND GLARE DISTRACTING ROAD TRAFFIC, NOT LEAST ON TRUNK ROADS. THE PROBLEM CAN BE OVERCOME BY CAREFUL DESIGN AND THE USE OF APPROPRIATE MEANS OF LIGHTING AND LIGHTING LEVELS. THE COUNCIL WILL PRODUCE SUPPLEMENTARY PLANNING GUIDANCE

99G1(8). ENERGY CONSERVATION

Objectors

<i>Objection 379</i>	<i>Environment Agency</i>
<i>Objection 866</i>	<i>Guildford Environmental Forum (CW)</i>
<i>Objection 1425, C237</i>	<i>Thames Water</i>
<i>Objection 1543</i>	<i>St Martha Parish Council</i>

4.2.59. PPG12 indicates that energy conservation is among the environmental considerations that should be taken into account in the preparation of development plans. The Plan, in seeking to provide for sustainable forms of development, has this among its central aims. A Policy is, therefore, appropriate, although more difficult to express in accurate land use terms than in the round. The Objections were looking to add detail as to what was meant by energy conservation to the Clause or the reasoned justification. The Environment Agency asked for a further Clause

"Reducing Water Consumption

Mains water usage is minimised in development".

An appropriate reasoned justification was also suggested. Thames Water also considered that the economy of water should be a Policy.

4.2.60. The Council proposed two additions to Paragraph 4.18, the first to draw attention to the Council's advisory scheme for making homes more energy efficient and the second to the economy of water consumption (PC20). The latter is an important consideration in the South East and is touched on in the Regional Guidance (RPG9, para 4.34) and in the emerging new Regional Guidance. The Surrey Structure Plan 1994 First Alteration proposed a policy (E17) which met one facet of the advice of PPG9 - the equation of development with water resources. If this is eventually adopted it will provide the appropriate land use policy backing for this issue. The Council's view that measures for the economy of water use were better expressed in the supporting paragraph is a practical approach to drawing this matter to the attention of developers. However, this is not the best heading for the purpose. There would be advantage in including a separate Clause.

4.2.61. I did not see that the Plan should include detail of energy conservation measures, such as the use of solar panels. This is a matter more appropriate to the Supplementary Planning Guidance mentioned in the Plan.

CHAPTER 4. RECOMMENDATION 8.

4.2.16. That a further Clause be added to Policy 99G1:-

99G1(X) CONSERVATION OF WATER RESOURCES

THE DESIGN, LAYOUT AND LANDSCAPING IS EFFICIENT IN THE USE OF WATER.

4.XX. WATER IS A SCARCE RESOURCE AND AS WELL AS IN THE SCALE AND LOCATION OF DEVELOPMENT THE COUNCIL WILL SEEK TO ENSURE THAT DEVELOPMENTS USE WATER ECONOMICALLY AND TO THE BEST ADVANTAGE. IN LARGE MEASURE THIS WILL BE ENSURED BY THE APPLICATION OF THE BUILDING AND OTHER REGULATIONS. THE COUNCIL WILL WORK WITH THE WATER COMPANIES AND THE ENVIRONMENT AGENCY TO PROVIDE GUIDANCE.

99G1(9). DEVELOPMENT ON OR CLOSE TO CONTAMINATED LAND

Objector

Objection 2054

GOSE

4.2.62. The Objection implied that the Clause was trespassing into the field of other legislation. There is a body of regulation and designated authorities for the control of development where there is, or may be, contamination. At the same time, the development of such land, or neighbouring land, is a planning matter and planning concerns may range more widely than those of the more particular legislation. The balance between the planning

regime and those for pollution and hazard is not easy, but it appeared to me that the Clause and the reasoned justification were appropriate and I saw no reason to suggest a change.

99G1(10). SAFEGUARDING AND ENHANCEMENT OF THE LANDSCAPE
AND EXISTING NATURAL FEATURES

Objectors

Objection 76
Objection 382

English Nature
Environment Agency

4.2.63. English Nature asked for the clause to be made more embracing of natural features of a site. The Environment Agency asked for the clause to be extended to include watercourses.

4.2.64. The Council was prepared to meet the Environment Agency' request, and to substitute "protection" for "retention" in the clause (PC21). The Plan contains in Chapter 12, Natural Environment, more detailed policies for the protection of designated sites of ecological importance, together with the ecological and landscape value of other land which may be affected by development. A number of Proposed Changes were put forward to that Policy, to meet points raised by English Nature among other Objectors, which would widen its scope and take in the matters raised in connection with this Objection. Among the Proposed Changes was the addition of a further Policy (99NE6) to safeguard the wildlife interest of undesignated sites affected by proposals for development. With this in mind I did not see a need to make further changes in this Chapter.

CHAPTER 4. RECOMMENDATION 9.

4.2.17. That PC21 be made.

99G1(11). MIXED USE

Objectors

Objection 507
Objection 912
Objection 1237
Objection 1613
Objection 1725
Objection 2073

St Catherines Village Association
Howard Hutton and Associates
Ash Parish Council
Mrs Cassar
Abbots Hospital
GOSE (CW)

Objections and Issues

4.2.65. The Objections fell into two groups, those which wished the clause to be more emphatic in its support of mixed use and those that were sounding cautions about the

environmental effects of placing unneighbourly uses together, such as some industrial uses and peoples' homes.

Consideration

4.2.66. PPG4 encourages a mix of uses, noting that many businesses can be carried on in rural and residential areas without causing unacceptable disturbance through increased traffic, noise, pollution or other adverse effects, depending on the scale, the nature of the use and the location. Planning policies should be flexible and not restrict industrial and commercial uses, particularly the reuse of existing buildings, in predominantly residential areas unless there are specific and significant objections. PPG7 gives much the same advice for rural areas; PPG2 gives somewhat more restrictive guidance for the reuse of buildings in Green Belts. The Government's guide, Planning for Sustainable Development: Towards Better Practice, Section 2 sets out to encourage mixed-use development, as a contribution to sustainability and to make urban areas more attractive as places to live, more viable, more varied and more secure.

4.2.67. The Clause, therefore, has good antecedents. The advice mentioned, with PPG1 and PPG13, nevertheless, draws attention to the problems that can in some circumstances be associated with a mix of differing uses. The Policy, therefore, needs to apply standards of discrimination, either by identifying areas considered suitable for mixed use development on the Proposals Map, or by listing appropriate criteria. I note that in Guildford Town Centre some sites are identified for mixed use development, but for the Plan area as a whole the latter appears to be required.

4.2.68. I consider that the Clause should be reworded and include a suggestion in the recommendation. I also consider that Paragraphs 4.21 and 4.22 should convey the flavour of the advice more fully.

4.2.69. The Objection on behalf of Abbots Hospital was considered in relation to Policy 99G1(3).

CHAPTER 4. RECOMMENDATION 9

4.2.18. That Policy 99G1(11) be worded:-

THE DEVELOPMENT INCORPORATES OR PERPETUATES AN EXISTING MIX OF LAND USES AND ACTIVITIES WHERE:-

- (A) THE USES ARE MUTUALLY COMPATIBLE;
- (B) THERE IS NO UNACCEPTABLE DISTURBANCE THROUGH INCREASED TRAFFIC, NOISE, POLLUTION OR OTHER ADVERSE EFFECTS.

and in place of Paragraphs 4.21 and 4.22 be substituted:-

4.21. MANY BUSINESSES CAN NOW BE CARRIED ON IN PREDOMINANTLY RESIDENTIAL OR RURAL AREAS WITHOUT SERIOUS DETRIMENT TO THE AMENITY OF THOSE AREAS. MIXED-USE DEVELOPMENT CAN CONTRIBUTE TO SUSTAINABILITY, MAKING URBAN AREAS MORE ATTRACTIVE, IMPROVING THE VITALITY AND VIABILITY OF COMMERCIAL CENTRES, REDUCING THE NEED TO TRAVEL, IMPROVING SECURITY, ADDING TO VARIETY OF BUILDINGS AND SPACES AND IMPROVING THE QUALITY OF RESIDENTIAL NEIGHBOURHOODS BY INTRODUCING A FOCUS OF ACTIVITY. WHEN LARGER SITES WITH MIXED USES ARE REDEVELOPED THE COUNCIL WILL EXPECT THE PATTERN OF MIXED USES TO BE RETAINED, IN SO FAR AS IT APPROPRIATE TO DO SO. IN RURAL AREAS, THE REUSE OF BUILDINGS CAN BE AN AID TO FARM DIVERSIFICATION AND HELP TO SUPPORT THE RURAL ECONOMY.

4.22. IT IS RECOGNISED THAT AS WELL AS ADVANTAGES THERE CAN BE DISADVANTAGES WHEN USES ARE MIXED THAT ARE NOT COMPATIBLE, HAVE UNACCEPTABLE EFFECTS ON THE AMENITY OF NEIGHBOURING RESIDENTS OR OTHER USES BY REASON OF THEIR ACTIVITIES, TRAFFIC GENERATION OR SCALE. WHAT IS APPROPRIATE ON A SITE IS DETERMINED BY

4.2.19. That PC22 and PC226 be NOT made.

NOTIFIABLE INSTALLATIONS

Objectors

Objection 1830
Objection C80

Health and Safety Executive (CW)
CPRE Surrey

4.2.70. A statement concerning Notifiable Installations was proposed for inclusion in the Plan following an Objection from the Health and Safety Executive, together with a new Appendix listing the installations (PC23). The installations concerned were those notifiable to the Health and Safety Executive under the Notification of Installations Handling Hazardous Substances Regulations 1992 and some other Regulations. In the Plan area, it appeared that one site in Guildford and three lengths of Transco gas pipeline are currently listed.

4.2.71. The Health and Safety Executive were also of the view that the Plan should contain a Policy setting out the constraints likely to be imposed by these installations on development in their vicinity, while the installations themselves were marked on the Proposals Map.

4.2.72. PPG12, paragraph 6.23 refers to plans including a policy relating to the location of establishments where hazardous substances are used or stored, and to the development of land within the vicinity of establishments where hazardous substances are present. It is accepted that there are relatively few installations in the Plan area, but the Plan could be expected to follow the advice and include policies relating to the establishment of new sites as well as to control development in the vicinity of installations. The nature of the installations does appear to make a listing of the sites in an Appendix more practical than marking them on the Proposals Map. I suggest in the recommendation Policies that could be appropriate, drawn from "Better Local Plans: A Guide to Writing Effective Polices". PC23 would appear to provide a suitable reasoned justification. CPRE were supportive of the changes proposed, if the Health and Safety Executive consulted the "Five Authorities", or the Council undertook to do so. The Council and I were in some doubt as to the consultation intended, but had no doubt that all proper consultations would be carried out.

CHAPTER 4. RECOMMENDATION 11.

4.2.20. That the following new Policies be added to the Plan:-

1. POLICY 99GX

PLANNING PERMISSION FOR DEVELOPMENT INVOLVING THE USE, MOVEMENT OR STORAGE OF A HAZARDOUS SUBSTANCE WILL NOT BE GRANTED IF THERE WOULD BE ADDITIONAL RISK TO THE HEALTH OR SAFETY OF USERS OF THE SITE, NEIGHBOURING LAND OR THE ENVIRONMENT.

2. POLICY 99GX

DEVELOPMENT IN THE VICINITY OF A SITE KNOWN TO BE USED FOR THE STORAGE, USE OR TRANSPORT OF HAZARDOUS SUBSTANCES WILL NOT BE GRANTED PERMISSION IF THERE WOULD BE AN UNACCEPTABLE RISK TO THE SAFETY OF ITS USERS.

4.2.21. That PC23 be made.

3. DESIGN CODE

POLICY 99G2

Objector

Objection 508

St Catherine's Village Association

4.3.1. The Objection asked that the preamble of the Policy should read "Development proposals which do not comply with the following design requirements will not be permitted". The Council did not see this to be necessary, in the light of Paragraph 4.26, which said much the same thing. I, however, think that the Objector is right and if the intention is to reject proposals which conflict with the code, this should be clear from the Policy itself.

CHAPTER 4. RECOMMENDATION 12.

4.3.1. That Policy 99G2 be changed to:-

DEVELOPMENT PROPOSALS WHICH DO NOT COMPLY WITH THE FOLLOWING DESIGN REQUIREMENTS WILL NOT BE PERMITTED:

99G2(1). CONTEXT FOR DESIGN

Objectors

Objection 1198

National Trust

Objection 1769

Consortium of Registered Social Landlords

Objection 2038

GOSE (CW)

4.3.2. The National Trust noted that the Policy would apply to development in the countryside as well as in urban areas and sought to make this first Clause more sympathetic to historic buildings and to landscape, as well as seeking respect for the history of a site. I shared the Council's view that these were considerations largely covered by other Policies of the Plan, in so far as development affecting Listed Buildings and development in Conservation Areas were concerned. Landscape considerations would be added to Clause 9 of the Policy by PC30. I did not see it as prudent for a design policy of general application to the Plan area to go beyond this.

4.3.3. The Consortium of Registered Social Landlords were seeking some relaxation for affordable housing developments from the need to comply with rigid design criteria, because of the additional costs these could add. It was clear that the members of the Consortium were seeking to build to high design standards, sometimes using innovative designs, nonetheless. While appreciating that design policies should not unnecessarily add to the costs of any building, I could see no reason to give an exemption from the necessity to provide good and appropriate design.

4.3.4. GOSE commented on the vagueness of the phrase "other townscape elements". The Council proposed to change this to "relationship with other buildings" (PC24).

CHAPTER 4. RECOMMENDATION 13.

4.3.2. That PC24 be made.

99G2(2). SCALE PROPORTION AND FORM

Objector

Objection 762 *The Guildford Society*

4.3.5. The Society's Objection related to the last sentence of Paragraph 4.28. This said "There are a number of buildings in the Town Centre which, if redeveloped, should be reduced in size and conform to the principles of the Design Code". The Society supported the intention, but thought this should itself be a policy, with the buildings to be reduced in size if opportunity arises listed in the Plan.

4.3.6. In my view, a sentence such as this could cause difficulties whether expressed formally as a Policy or left in the quasi-policy form of the deposit version of the Plan. I noted that the sentence was proposed to be changed by substituting "height" for "size" (PC25). There is, nevertheless, a blighting effect on a number of buildings in the Town Centre. I consider that the Design Code could be used to achieve the Council's objectives without a statement such as this and that it would be best omitted.

CHAPTER 4. RECOMMENDATION 14.

4.3.3. That PC25 be NOT made and the last sentence of Paragraph 4.28 be omitted.

99G2(3). SPACE AROUND BUILDINGS

4.3.7. There were no Objections recorded to this Clause.

99G2(4). STREET LEVEL DESIGN

Objector

Objection 764 *The Guildford Society*

4.3.8. The Objection related to the word "even" followed by "the use of art" in the penultimate sentence. The Council agreed that this was perhaps underestimating the potential of art in street level design and proposed to substitute "and" for "even" (PC26).

CHAPTER 4. RECOMMENDATION 15.

4.3.4. That PC26 be made.

99G2(5). LAYOUT

4.3.9. No Objections were recorded to this Clause.

Objectors

<i>Objection 788</i>	<i>University of Surrey (CW)</i>
<i>Objection 1545</i>	<i>St Martha Parish Council (CW)</i>
<i>Objection C84</i>	<i>CPRE Surrey</i>

4.3.10. The University of Surrey considered that the Clause should conform to Paragraph 4.32, where it was "important" public views that were to be protected. The addition of "important" to the title of the Clause and to the Clause itself was proposed by PC27. The Parish Council asked for an additions to the final sentence of the reasoned justification, Paragraph 4.32, that in protecting important public views schemes of planting to mask unsightly developments would be undertaken. The addition was proposed by PC27 and PC28.

4.3.11. CPRE, with the proposals of the Plan for Manor Farm in mind, felt that it would be better for the Plan to seek to protect and enhance public views generally, rather than add the value judgement that "important" would imply. It was considered that Policy 6BE of the adopted local plan, by which the Council sought to "protect the quality of public views and seek opportunities to create attractive new views and landscapes ..." expressed the intention better.

4.3.12. I could accept that in matters of design in particular there will be a strong subjective element. Nevertheless, some qualification as to what views it is sought to protect is desirable beyond that they are "public". The reasoned justification uses "important", but does not go on to say what those views are, although it does give the indication that the topography of the Plan area affords many fine views, and to attach importance to the approaches to Guildford. While there would be a case for identifying the views of most importance, I considered that the Clause would, with the Proposed Change, adequately meet its purpose.

CHAPTER 4. RECOMMENDATION 16.

4.3.5. That PC27 and PC28 be made.

99G2(7). MATERIALS AND ARCHITECTURAL DETAILING

Objector

<i>Objection 767</i>	<i>The Guildford Society (CW)</i>
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4.3.13. In its deposited form Paragraph 4.33 supporting the Clause made much of the "Surrey style" of domestic architecture that evolved in the later part of the nineteenth and the early twentieth centuries. The Objection was that, while important to the area, the Plan should not appear to favour one style over others, particularly as it could result in designs

providing an undesirable pastiche of Arts and Crafts Movement features. The Council, quite reasonably, accepted the Objectors view that the Plan should support local identity and character, including respect for architectural features and materials, but permit, where appropriate, modern finishes or detail of quality and durability (PC29).

CHAPTER 4. RECOMMENDATION 17.

4.3.6. That PC29 be made.

99G2(8). TRAFFIC, PARKING AND DESIGN

4.3.14. No Objections were recorded to this Clause.

99G2(9). LANDSCAPING

Objectors

*Objections 1851, C88
Objection 915*

*CPRE Surrey
Howard Hutton and Associates
(CW)*

4.3.15. CPRE was concerned initially that the Clause referred only to "townscape", appearing to overlook the importance of landscape considerations in rural areas. "And landscape" was proposed to be added to the Clause by PC30.

4.3.16. The second Objector pointed out that existing trees cannot always be retained and that too demanding a policy could lead to the loss of trees through preemptive felling, or lead to compensation claims if development were restricted solely on the basis of loss of trees. Preferable would be:-

"Existing trees should be retained where possible unless the benefits of development outweigh their loss in which case replacement planting will normally be sought".

The Council proposed this change in PC31.

4.3.17. CPRE maintained that this change would loosen the Policy too much. Existing trees should be retained, particularly more important specimens, or if removal were necessary, trees should be relocated (the means now existing to do this) or, where it was acceptable, replaced.

4.3.18. The Council in response indicated that even where trees were necessarily lost on redevelopment replacement would be sought. My view was that the proposed change was necessary, the deposited version of the sentence having the form of a policy and being over restrictive in its apparent intention. As proposed to be changed, a more balanced and practical attitude is conveyed, without reducing the importance of the protection of trees, resiting trees or new planting, when development takes place.

CHAPTER 4. RECOMMENDATION 18.

4.3.7. That PC30 and PC31 be made.

99G2(10). OPEN SPACES OF VALUE

4.3.19. There were no Objections recorded to this Clause.

4. PLANNING BENEFITS

POLICY 99G3

Objectors

<i>Objection C41</i>	<i>Horsley Countryside Preservation Society</i>
<i>Objection 1173</i>	<i>Action</i>
<i>Objection 231</i>	<i>GOSE (CW)</i>
<i>Objection 517</i>	<i>Guildford Diocesan Board of Finance</i>
<i>Objection 770</i>	<i>Guildford Society</i>
<i>Objection 1770</i>	<i>Consortium of Registered Social Landlords</i>
<i>Objection 1852</i>	<i>CPRE</i>

Objections and Issues

4.4.1. There was a view expressed or implied by some Objectors that the concept of requiring "planning benefits" from developments could give the appearance that a financial consideration might take precedence over normal planning matters in the consideration of planning applications. The Government's advice, that of Circular 1/97 in particular, is strong on any obligations sought being required as a direct result of the development proposed and not in pursuit of any wider objectives or ambitions.

4.4.2. Other Objections queried the extent to which the advice was being followed, or sought additions to or subtractions from the list of examples of the infrastructure or other facilities towards which contributions might be sought.

Consideration

4.4.3. The Policy itself went further than the advice might permit in suggesting that planning benefits might be sought "to achieve the objectives of the Plan". In the broad sense, that might well be the case, but the Plan has to be clear that it is only needs arising from the development itself to which the Policy relates. PC32 proposed the removal of that phrase. The two supporting paragraphs of the section largely paraphrased Annex B to Circular 1/97. In so far as Paragraph 4.38 is concerned, the paraphrasing might usefully go a little further in setting out the circumstances given in paragraph B9 of the Circular, in doing so going

towards meeting the fears of those Objectors uncertain about the process or seeking safeguards. There is a suggestion in the recommendation.

4.4.4. As to the examples in Paragraph 4.39, these seem to come from paragraphs B9 and B10 of the Circular. Highway works are mentioned there, although they may also be required under the Highways Acts. Community facilities are appropriately included, subject to the same tests of the need, scale and kind arising from the development.

4.4.5. The provision of affordable housing is given also as an example of an appropriate planning obligation. The Objection from the Consortium of Registered Social Landlords asked that planning obligations should not be sought from developers of affordable housing. In so far as affordable housing, or a site for its construction, is being provided as a planning obligation, this might not arise. That most developments for affordable housing are relatively small and on urban sites may also be a factor. However, where affordable housing development gives rise to needs within the site or beyond which meet the criteria for a planning obligation to be sought, I share the Council's view that this should be taken into account. All planning obligations are necessarily matters for negotiation. The advice is that planning permission should never be refused because an applicant is unwilling or unable to offer benefits and that the overall quality of the development should receive more emphasis than the nature or value of planning benefits which might be obtained. The Council has indicated its intention to follow the advice closely in operating this Policy and that should be sufficient reassurance to those who are concerned at its implications.

CHAPTER 4. RECOMMENDATION 19.

4.4.1. That PC32 be made.

4.4.2. That the first sentence of Paragraph 4.38 be worded as follows:-

THE COUNCIL WILL SEEK FROM DEVELOPERS PLANNING BENEFITS WHERE THEY ARE NEEDED FROM A PRACTICAL POINT OF VIEW TO ENABLE THE DEVELOPMENT TO GO AHEAD, OR WHERE THEY ARE NECESSARY FROM A PLANNING POINT OF VIEW AND ARE SO DIRECTLY RELATED TO THE PROPOSED DEVELOPMENT AND TO THE USE OF LAND AFTER IT IS COMPLETED THAT THE DEVELOPMENT OUGHT NOT TO BE PERMITTED WITHOUT THEM.

5. ART IN THE ENVIRONMENT

POLICY 99G4

Objectors

<i>Objection 916</i>	<i>Howard Hutton and Associates (CW)</i>
<i>Objection 1224</i>	<i>McCarthy and Stone</i>
<i>Objection 2046</i>	<i>GOSE</i>
<i>Objection C42</i>	<i>Horsley Countryside Preservation Society</i>

4.5.1. The Policy indicates that the Council will implement a Percentage for Art scheme to encourage the incorporation of art in major development proposals. The antecedents of the Policy lie in an initiative of the Arts Council in 1988, which sought to encourage developers to devote a small proportion of the expenditure on development to the creation of works of art by living artists for public display.

4.5.2. The Objections queried the incorporation of such a Policy, for adding considerations not directly related to land use to the determination of a planning application. That the Council's proposed addition to Paragraph 4.40, intended to make it more clear what major development proposals were, also indicated that works of art provided through the scheme might be sited elsewhere in the Plan area (PC33), was seen to further divorce the Policy from strict planning considerations. McCarthy and Stone asked that residential schemes which might be considered major development proposals should be exempt from the Policy, a point the Council was not willing to accept.

4.5.3. The Percentage for Art scheme has been applied by a number of authorities in the years since its inception, Guildford Borough Council having been among them. It has been successful in obtaining works of art to enliven buildings and open spaces and in general it has been supported by developers and the public. However, it was evident from the Opinion of Mr Robert Carnwath QC attached to the Council's response to the Objections that contributions under a Policy such as this can only be encouraged and cannot be required for planning permission to be granted. The Policy as deposited is in the form of giving encouragement, although Paragraph 4.40, particularly with the Proposed Change, and Paragraph 4.41 make the Policy look to be a requirement, almost an inevitability if the intention is to be a Plan Policy.

4.5.4. I noted that the adopted plan contains a similar policy and am aware that there are a number of local plans containing such policies. My view, nevertheless, remains that if a Percentage for Art policy is to be mentioned in the Plan it should be "lower case" only, indicating encouragement and giving no impression of coercion. I suggest in the Recommendation how the section should be changed.

CHAPTER 4. RECOMMENDATION 20.

4.5.1. That Policy 99G4 be omitted.

- 4.5.2. That PC33 be NOT made.
- 4.5.3. That Paragraphs 4.40, 4.41 and 4.42 be changed as follows:-

THE BOROUGH COUNCIL SUPPORTS THE PRINCIPLE OF "ARTS FOR ALL" ENABLING PARTICIPATION IN A WIDE RANGE OF ARTS AND CULTURAL ACTIVITIES, PARTICULARLY FOR YOUNG PEOPLE AND THOSE WITH DISABILITIES. AS A PART OF THIS PRINCIPLE THE COUNCIL WILL ENCOURAGE THROUGH NEGOTIATION PARTICIPATION BY DEVELOPERS IN A PERCENTAGE FOR ART SCHEME TO INCORPORATE ART THAT WILL BE BENEFICIAL TO THE PUBLIC AS PART OF MAJOR DEVELOPMENT PROPOSALS. ART THAT MIGHT BE PROVIDED THROUGH THE SCHEME CAN INCLUDE A WIDE RANGE OF INDIVIDUAL WORKS AND DECORATIVE FEATURES AND SUPPLEMENTARY PLANNING GUIDANCE HAS BEEN PREPARED TO GIVE ASSISTANCE TO DEVELOPERS. WHERE THE PROVISION OF ART IS AGREED, A SECTION 106 AGREEMENT MAY BE SOUGHT AS AN AID TO IMPLEMENTATION.

6. SHOPFRONTS AND ADVERTISEMENTS

POLICY 99G5. SHOPFRONT DESIGN

4.6.1. There were no outstanding Objections to this Policy, although the Council proposed PC166 to correct a printing error.

CHAPTER 4. RECOMMENDATION 21.

4.6.1. That PC166 be made.

POLICY 99G6 ADVERTISEMENTS

Objectors

<i>Objection 445</i>	<i>Highways Agency</i>
<i>Objection 458</i>	<i>CPRE Waverley</i>

4.6.2. The Objectors noted that the Policy did not make reference to advertisements in rural areas, nor enlarge upon public safety to include highway safety.

4.6.3. The Council agreed to additions to Paragraph 4.47 to meet both Objections, which were as a result conditionally withdrawn. I support these proposed changes.

CHAPTER 4. RECOMMENDATION 22.

4.6.2. That PC34 and PC35 be made.

POLICY 99G7 PROJECTING SIGNS IN THE HIGH STREET

Objectors

Objection 559

Mr Macpherson

Objection 773

The Guildford Society

4.6.4. The Policy indicated that consent would not be forthcoming for projecting signs in the pedestrianised parts of the High Street. The reason for this appeared to be that the sharp rise of the High Street would leave successive signs visible above their lower neighbours, rather than partially masked as is the case when the pavement is level, resulting in a dominating clutter of signs.

4.6.5. The Objectors saw this as too sweeping a Policy, suggesting instead criteria which if observed could make such signs acceptable. Mr Macpherson noted that there were already a number of projecting signs in the High Street, which he considered added interest and character to the street, in which were a vigorous mixture of styles, old and new, in a setting that was still robustly commercial. The adopted local plan was observed to have a policy which permitted projecting signs which accorded with Supplementary Planning Guidance.

4.6.6. I support the Council's wish to apply a particularly strict control to the display of projecting signs in the High Street, a particularly fine urban townscape which pedestrianisation has made more accessible and in some respects more visible than it was in the past. As one Objector pointed out, there are a number of signs already displayed, and they have their merits, but a proliferation could be severely damaging.

4.6.7. Nevertheless, I do not see a specific Policy in the Plan relating to this issue to be necessary. Powers for the control of advertisements are provided by the Regulations and Policy 99G6 provides an adequate link between the application of the Regulations and the Plan, supported as it is by Supplementary Planning Guidance. I therefore consider that this Policy should be omitted.

4.6.8. Appreciating the antecedents of the Policy, if this recommendation were not accepted, it appeared to me that there had to be some room for the exceptional instance where it might be beneficial to permit further signs, new or in replacement of the existing. I could accept that this need not be expressed in the Policy itself. That has the flexibility of all plan policies to admit the exceptional case. A rewording of Paragraph 4.49 to draw attention to the criteria contained in the Supplementary Planning Guidance could be sufficient. A suggestion is in the recommendation.

CHAPTER 4. RECOMMENDATION 22.

4.6.3. That Policy 99G6 be omitted.

Alternatively, that Paragraph 4.49 be reworded:-

IN THE EXCEPTIONAL CIRCUMSTANCES IN WHICH IT MAY BE APPROPRIATE TO CONSIDER APPLICATIONS FOR PROJECTING SIGNS IN THE PEDESTRIANISED PART OF THE HIGH STREET, REGARD WILL BE HAD TO THE EFFECT OF THE SIGN ON THE IMPORTANT TOWNSCAPE OF THE HIGH STREET AND TO THE CRITERIA SET OUT IN THE COUNCIL'S SUPPLEMENTARY PLANNING GUIDANCE - ADVERTISEMENTS AND SIGNS, JUNE 1994.

POLICY 99G8 ADVANCE WARNING SIGNS RELATING TO ROADSIDE SITES

Objectors

Objection 446
Objection 2055

Highways Agency (CW)
GOSE

4.6.9. The Policy says that advertisement consent will only be granted for advanced warning signs relating to roadside sites where there is an overriding justification in terms of public safety. A similar policy is contained in the adopted local plan.

4.6.10. The Highways Authority asked for the Policy to be strengthened. GOSE considered that the same objective could be achieved through other legislation. In so far as this Policy is indicating the way that particular sorts of advertisements will be assessed in terms of public safety, the topic is covered by Policy 99G6. There is advice in PPG19 and Circular 5/92 as to what should be taken into account in considering public safety issues, highway safety being its major component. The Policy does, however, go a step further by making the test of public safety a positive one, the applicant must show positive public safety benefits rather than that there is no public safety harm.

4.6.11. While I have no objection to the Council's suggestion that "highway safety" be substituted for "public safety" in the Policy, or to the addition of PC36 if the Policy is to be retained, in my view it is wrong in its emphasis, but in any case unnecessary and would be better removed. Such guidance as is considered necessary would be better confined to the Supplementary Planning Guidance.

CHAPTER 4. RECOMMENDATION 24

4.6.4 That Policy 99G8 be omitted.

POLICY 99G9 "A" BOARDS

4.6.12. There were no Objections recorded to this Policy, only representations in support. My view of this Policy is, however, that, as in the case of the Policy above, it is unnecessary, Policy 99G6 providing an adequate context for the application of the Regulations. The disadvantages of "A" boards are referred to in the Supplementary Planning Guidance, although that reference could be usefully expanded with the reasoned justification of this Policy and overall made less categorical in its rejection of this form of advertising.

CHAPTER 4. RECOMMENDATION 25.

4.6.5. That the Council reconsider the inclusion of this Policy in the Plan and the content of the Supplementary Planning Guidance.

7. TELECOMMUNICATIONS.

POLICY 99G10

Objectors

<i>Objection 39</i>	<i>Mercury Personal Telecommunications</i>
<i>Objections 233, 2048, 2056</i>	<i>GOSE</i>
<i>Objection 392</i>	<i>British Telecommunications Plc</i>
<i>Objection 2022</i>	<i>Councillor N Sutcliffe</i>

4.7.1. Telecommunications development can cover a wide range of installations, some of which are permitted development or usually treated on the "de minimus" principle. The Policy was likely to have its greatest impact on development associated with the expansion of the cell phone network or more major radio or television installations. The Objections, with the exception of that of Councillor Sutcliffe, came down to the relationship of the Policy with the requirements of the legislation and the Government's advice on telecommunications development. As is noted in the supporting paragraphs, the Government's stance is supportive of the development of telecommunications networks, the legislation, the Telecommunications Act 1984, the Telecommunications Code and the licensing system, together with the advice of the White Paper and PPG6 providing a detailed framework for the provision of the necessary infrastructure. The Plan should contain a policy base for the consideration of those matters that properly come within planning, but avoid repetition of the controls that exist in the other parts of the system.

4.7.2. The Council accepted that some changes to the Policy and the reasoned justification were appropriate (PC37). These proposed changes would change the first criterion of the Policy, which referred to there being an established need for the development and full details of the proposed network having been provided. "Need" in an economic sense is not normally regarded as a planning consideration, and there could be a view that the criterion was a restraint on the provision of competing systems, or on fulfilling licence requirements. The proposed change substituted a requirement of "need" in relation to the

location proposed. This can be interpreted as a technical operational need, although the other hoops a proposal has to go through before becoming an application should mean that the "need" in this sense is a prerequisite. I do not see this criterion to be required.

4.7.3. Much the same considerations can be applied to the second criterion, in so far as some of its considerations are covered by the licensing arrangements. This was pointed out by Objectors. I saw no objection to the inclusion in the Policy of an expectation that alternatives to a mast in a particular location had been explored, but felt that before coming to that criterion it would be better to introduce a concept of "no unacceptable or unavoidable adverse impact on the environment", built or natural. Although it was also criticised, I saw no reason not to include a criterion as to the detailed design, siting, landscaping or colour of masts, the third criterion.

4.7.4. The additional criterion proposed by PC37 asked for a comprehensive plan for new networks having been developed, to enable the Council to make a comprehensive assessment of the environmental effects, rather than being in a position of necessarily dealing with its parts piecemeal. This again is something essential to the licensing system, but I could appreciate its relevance to the consideration of planning applications for cell phone or other network developments.

4.7.5. I considered it appropriate to stress those locations where there would be a need for particularly close attention to the environmental effects of proposals. This I considered to be a reason for including an environmental criterion in the first part of the Policy. This paragraph accepts that there will be circumstances when it will be necessary to site telecommunications installations in areas with landscape, natural or built environment designations, in residential areas or in the countryside at large. The final paragraph related to the removal of equipment once it was no longer needed. This appears to be a requirement of the Telecommunications Act, which would be usefully included in the reasoned justification by PC37. The Council may wish to reinforce this with a condition if permission is granted, but I do not consider it needs to be in the Policy.

4.7.6. Councillor Sutcliffe considered that the Policy could only be effective if all telecommunications providers worked together on a single network of masts, to minimise their number. The licensing arrangements do not go this far, although there is a requirement to keep the amount of equipment installed to a minimum and to examine mast sharing. The Plan could not, I consider, reasonably make a requirement for a single network.

4.7.7. I suggest in the recommendation a form the Policy might take. Those parts of PC37 not affected by my suggestions I recommend are made.

CHAPTER 4. RECOMMENDATION 26.

4.7.1. That Policy 99G10 be worded as follows:-

TELECOMMUNICATIONS DEVELOPMENT WILL BE PERMITTED PROVIDED THAT:-

1. THERE WOULD BE NO UNACCEPTABLE OR UNAVOIDABLE IMPACT ON THE BUILT OR NATURAL ENVIRONMENT;
2. WHERE SUCH AN IMPACT COULD OCCUR THE COUNCIL CAN BE SATISFIED THAT ALTERNATIVES TO THE EQUIPMENT PROPOSED, THE SITE CHOSEN AND THE POSSIBILITY OF SHARING FACILITIES HAVE BEEN FULLY EXPLORED AND FOR TECHNICAL OR LEGAL REASONS ARE IMPRACTICAL;
3. ANY MAST OR OTHER EQUIPMENT PROPOSED IS APPROPRIATELY SITED, DESIGNED, COLOURED AND LANDSCAPED TO MINIMISE ENVIRONMENTAL DAMAGE;
4. A COMPREHENSIVE PLAN FOR NEW NETWORKS HAS BEEN DEVELOPED WITH THE LOCATION AND TYPE OF FACILITIES DETERMINED HAVING REGARD TO THE NEED TO MINIMISE ADVERSE IMPACT ON THE ENVIRONMENT.

PARTICULAR ATTENTION WILL BE PAID TO THE SITING OF ALL TELECOMMUNICATIONS DEVELOPMENT WITHIN OR IN CLOSE PROXIMITY TO CONSERVATION AREAS, LISTED BUILDINGS, AONB, AGLV, SSSIS, SBCIS, OPEN COUNTRYSIDE AND WHERE DEVELOPMENTS MAY AFFECT THE AMENITIES OF OCCUPIERS OF NEARBY PROPERTIES.

(The final paragraph is omitted)

4.7.2. That except as changed by the recommendation above, PC37 be made.

8. THE CORRIDOR OF THE RIVER WEY AND THE GUILDFORD AND GODALMING NAVIGATIONS.

POLICY 99G11

Objectors

<i>Objection 1</i>	<i>Wey and Arun Canal Trust (CW)</i>
<i>Objection 94</i>	<i>Guildford Group Ramblers Association</i>
<i>Objection 463</i>	<i>CPRE Waverley</i>
<i>Objection 511</i>	<i>St Catherine Village Association</i>
<i>Objection 565</i>	<i>Wey Estate</i>
<i>Objection 777</i>	<i>Guildford Society</i>
<i>Objection 1199</i>	<i>National Trust</i>
<i>Objection 1275</i>	<i>Vision Engineering Ltd</i>
<i>Objection 1298</i>	<i>Surrey Wildlife Trust (CW)</i>

Objection 1394
Objection 1439
Objection 1525
Objection 1853
Objection 2039

Wildbrook Properties Ltd
Environment Agency
Loseley Estate
CPRE Surrey
GOSE

4.8.1. The River Wey and the Guildford and Godalming Navigations have much historical interest, a considerable recreational value and urban and rural landscapes of distinct character. The waterways themselves seem to be largely owned and managed by the National Trust, who commissioned a study which resulted in the publication of an Environmental Strategy (Chris Blandford Associates, April 1997). The Environmental Strategy recognised a number of issues. These included the pressures arising from recreational activities, the damage to the rural landscape arising from changes in farming, urban pressures and a legacy of buildings which do not always enhance the appearance or character of the waterways. The Council has responded to some of these issues by designating the waterways and their immediate surroundings a Conservation Area. This Policy provides a broader basis for the protection and enhancement of the waterways and their setting.

4.8.2. There were Objections that the Policy was imposing an additional layer of control that was unnecessary, other Policies of the Plan covering the same ground. I accept that in the general terms of the control of development that is so. Nevertheless, there are specific objectives for the waterways and I see it as valuable to both identify and to have a Policy that supports the objectives for the Corridor.

4.8.3. The National Trust was supportive of the Policy, but asked for some changes to relate it more closely to the waterways themselves. The Trust made the important point that passing through five district council areas the respective local plans should include consistent policies to ensure that the special historic, architectural and landscape character of the waterways is recognised, preserved and enhanced as well as the landscape and townscape of the broader Corridor. The Trust suggested a Policy:-

"Development within the Corridor, as defined on the Proposals Map, will be permitted provided that:

1. It protects and enhances the special character of the River Wey and the Guildford and Godalming Navigations, in particular their visual qualities, setting, amenities, ecological value, architectural and historic interest.
2. The special character of the landscape and townscape in the Corridor is protected and enhanced.
3. Views both within and from the corridor which contribute to this special character are protected and enhanced".

4.8.4. The Council appeared to be off the view that this wording made the Policy too narrow, excluding the wider control of development in the Corridor as a whole, but I did not see that. I had no knowledge of the form of the policies included in other local plans and whether or not this would be consistent. However, it appeared to me to be a preferable

approach to that of the Plan, in that it would give greater precision to what is intended within the Corridor.

4.8.5. This wording would not go as far as the CPRE sought, and I accept the Council's view that the virtual presumption against development of the wording proposed by the CPRE would not be appropriate.

4.8.6. There was Objection to the use of "enhance" in relation to landscape in Criteria 1 and 2. The National Trust's alternative policy sought enhancement of the special character of the waterways and Corridor. The test in Conservation Areas is that development should preserve or enhance the character or appearance of the area. In requiring development to protect and enhance landscape, townscape and views within and from the Corridor the Policy may be setting too stern a test. "Is compatible with or improves" or "protects or improves" could be more appropriate expressions with the same objective.

4.8.7. The third criterion of the Policy concerned the provision of public access, where appropriate. This gave rise to Objections that it was not sufficiently emphatic in seeking further public access to the waterways for recreational use and the footpaths and cycleways they provide. The Council commented that the Policy suggested by the National Trust did not mention public access, and I agree that if my recommendation to use that form of the Policy is accepted this further criterion should be added. The wording of the Criterion appeared to me to take account of the management needs of the National Trust for a working waterway by confining public access to "where appropriate".

4.8.8. The Surrey Wildlife Trust asked that the Policy protect the valuable species and habitats found along the Corridor. PC38 was proposed to add a further criterion relating to the protection of the nature conservation value of sites.

4.8.9. The boundaries of the Corridor to which the Policy relates is defined on the Proposals Map. The Policy area was described as reflecting the visual envelope identified in the Environmental Strategy and including all land which forms part of the river valley. The National Trust asked for five changes to the boundary, which the Council was prepared to accept (PC38). CPRE also asked for changes to the boundary, but without giving further detail. Not having maps which showed whether the Corridor defined on the Proposals Map related directly to a boundary drawn by the Environmental Strategy, I could not see if the additions asked for by the National Trust were based on the Strategy. Whether they were or not I could see no sufficient reason not to make the changes. Nevertheless, it would be of value to include in the reasoned justification the basis given for defining the Corridor, as it was described. This could be added to Paragraph 4.57.

4.8.10. There were several suggestions from Objectors to change the wording of the reasoned justification. As with the Policy itself, I saw no need to make the reference in Paragraph 4.58 to the riverside walk more emphatic. The change proposed to Paragraph 4.59 in the interests of water recreation interests and users (PC39) was appropriate, as was the updating of Paragraph 4.60 now that the Conservation Area has been designated (PC40). The reference to the Wey and Arun Canal also proposed by PC40 would be a useful addition,

taking account of this further waterway and the restoration work that is going on. This is not, however, a part of this Policy area and that should be made plain.

CHAPTER 4. RECOMMENDATION 27.

4.8.1. That the Policy be worded as follows:-

DEVELOPMENT WITHIN THE CORRIDOR, AS DEFINED ON THE PROPOSALS MAP, WILL BE PERMITTED PROVIDED THAT:

1. IT PROTECTS OR IMPROVES THE SPECIAL CHARACTER OF THE RIVER WEY AND THE GUILDFORD AND GODALMING NAVIGATIONS, IN PARTICULAR THEIR VISUAL QUALITIES, SETTING, AMENITIES, ECOLOGICAL VALUE, ARCHITECTURAL AND HISTORIC INTEREST.
2. THE SPECIAL CHARACTER OF THE LANDSCAPE AND TOWNSCAPE IN THE CORRIDOR IS PROTECTED OR IMPROVED.
3. VIEWS BOTH WITHIN AND FROM THE CORRIDOR WHICH CONTRIBUTE TO THIS SPECIAL CHARACTER ARE PROTECTED OR IMPROVED.
4. WHERE APPROPRIATE, PUBLIC ACCESS IS PROVIDED TO AND ALONG THE RIVER AND THE NAVIGATIONS.
5. THE NATURE CONSERVATION VALUE OF THE SITE IS PROTECTED OR IMPROVED.

4.8.2. That PC49 be made.

4.8.3. That PC40 be made except that the third and fourth sentences be worded:-

BEYOND THE CORRIDOR OF THE RIVER WEY AND GUILDFORD AND GODALMING NAVIGATIONS A 1.2 MILE STRETCH OF THE WEY AND ARUN CANAL IS WITHIN THE BOROUGH. PARTS OF IT ARE GRADUALLY BEING RESTORED.

4.8.4. To Paragraph 4.57 be added:-

THE POLICY AREA WAS DRAWN TO REFLECT THE VISUAL ENVELOPE IDENTIFIED IN THE ENVIRONMENTAL STRATEGY AND INCLUDES ALL LAND WHICH FORMS PART OF THE RIVER VALLEY.

9. PROPOSALS FOR NEW POLICIES

(a) DEFINITION OF GUILDFORD TOWN CENTRE

Objectors

Objection 2012

Mrs S Southcott (CW)

Objection 2013

Mr D Southcott

4.9.1. The Objectors were concerned, it appeared, for the Objections were given little elaboration, with the spread of activities from the commercial area of Guildford Town Centre into the immediately adjoining residential areas. Essentially, the protection of the character and amenity of those residential areas was sought in the face of proposals for development in or around the Town Centre. Reference was made to the Town Centre Boundary, with the implication that this should form a firm demarcation.

4.9.2. As mentioned earlier, the Plan does not define the Town Centre, only a Town Centre Parking Boundary. The Plan defines different parts of the Shopping Areas and some sites on which development is proposed. There are frequent references in the text to the Town Centre. I did, therefore, consider if the Plan should define the Town Centre, but concluded that this might cause as many problems as it would solve. The Central Area Parking Boundary was too widely drawn for the purpose, taking in quite large residential areas. For practical purposes the Town Centre is recognisable and a better, more flexible approach is to have in the Plan a framework of policies that permit its development and change while protecting, in particular, residential uses within or adjoining the commercial centre and the character and environment of the centre and its surrounding residential areas. This I consider the Plan does more than adequately.

(b) DEVELOPMENT OF LAND PREVIOUSLY USED FOR MINERAL EXTRACTION

Objector

Objection 1595

RMC Properties Ltd

4.9.3. The Objector considered that the opportunities available in the re-use of former mineral working sites to achieve development without the need to use greenfield land should be recognised. Brownfield sites were unlikely to be capable of meeting all of the development needs of the Plan area, but some former mineral sites were in sustainable locations. Substantial areas of land were available, usually in single ownerships, which offered the opportunity to undertake comprehensive schemes which could provide for housing and other needs while bringing considerable landscape improvements. Attention was drawn to the advice concerning the development of previously developed land in preference to greenfield land.

4.9.4. A new Policy was proposed:-

"Proposals to redevelop land previously used for minerals extraction in sustainable locations may be considered favourably in order to maximise the efficient re-use of land and to preserve undisturbed greenfield land."

4.9.5. The Surrey Minerals Local Plan has policies concerning the re-use of land once mineral working cease, seeking restoration for predominantly open uses, including agriculture, forestry, nature conservation and various recreational activities. One difficulty in envisaging the former mineral working sites of the Plan area as having potential for built development is that many of them are in the Green Belt, or in the countryside, and of a scale that would suggest that if development were to take place it should be through the process of allocation in the Plan in response to an identified need rather than through a general enabling policy.

4.9.6. Some former minerals working sites have been put forward by Objectors for allocation and these are considered individually. There may be some small minerals sites, or parts of larger ones, where development would not be contrary to the Green Belt, countryside or other protective policies of the Plan. There would, however, be no need for a separate policy, the Plan permitting development in those sorts of circumstances. I agree with the Council that it would be contrary to the objectives of the Plan to open up to the possibility of development quite large areas in the Green Belt or countryside for which the Plan identifies no need. I do not consider such a Policy to be appropriate for inclusion.

CHAPTER 5. HOUSING

1. INTRODUCTION

5.1.1. The Introduction quantifies the housing stock of the Borough, notes that its condition is generally good and that 75 % of dwellings are owner occupied, although the high price of housing leaves a significant proportion of the Borough's population unable to afford their own dwellings. Average household sizes are decreasing, maintaining a demand for further housing, although the population is relatively static, and exacerbating the deficiency of smaller dwellings in the housing stock. The Policies later in the Chapter bearing on these problems attracted a number of Objections, although none related specifically to this introductory section.

2. SURREY STRUCTURE PLAN 1994

5.2.1. The Section gave the requirement of the Structure Plan that while advocating a slowing down in the rates of development in the County, and a lower rate of development than in preceding years was expected in the Plan area, there was a need to accommodate a net increase of 3800 dwellings between 1991 and 2006. Whether the Plan was making proper allowance for this increase was the subject of many of the Objections to Policies 99H1 and 99H2.

3. OBJECTIVES

5.3.1. The Objectives derived from the Aims of the Plan set out in Chapter 3. As well as providing sufficient housing to meet the Structure Plan's requirement, they included the provision of an appropriate range of dwelling sizes and prices, so that, in particular, there was housing available to those who could not afford open market housing. Sites for new housing would be sought mainly in the urban areas with emphasis on protecting the Green Belt and countryside from encroachment for residential development.

5.3.2. The Objectives attracted a measure of support, but also one Objection.

Objection 1854

CPRE Surrey (CW)

5.3.3. CPRE suggested the addition of a further Objective:-

"Priority being given to housing development which provides for the needs of the Borough's residents".

5.3.4. The Council pointed out that this Objective was implicit in the other five and therefore unnecessary. That is undoubtedly so, Paragraph 5.7 pointing out that the Council wishes to ensure that new housing reflects the needs of the Borough's residents. However, the housing market of the Plan area is necessarily dynamic and a part of much wider housing market. The new housing provided will cater for the shifts in population that will inevitably occur as people change jobs, retire, or seek larger or smaller dwellings over wider areas than simply that of the Plan. To restrict these movements, even if it were practicable to do so,

would not be in the interests of the economy or the community of the Borough. This I see as a positive reason for not including such an objective.

4. SUPPORTING MEASURES

Objector

Objection 1771

Consortium of Registered Social Landlords

5.4.1. The supporting measures referred to in the implementation of the Policies of the Chapter were primarily those of the Council's Housing Strategy. The Objectors asked for reference in the Policies to the Council's Housing Strategy, as a tool for monitoring their effectiveness.

5.4.2. The Policies of the Plan and the Council's Housing Strategy are clearly complementary, although the latter extends beyond matters that are appropriate for the Plan. I can accept that there may be matters in the Strategy that would be of assistance in the monitoring of the Plan, but, with the Council, I saw the reference in this Section to be sufficient without further mention in individual Policies.

5. NEW HOUSING PROVISION

5.5.1. This Section of the Chapter contained the Policies indicating how the Plan was to meet the requirement for new housing provision set down by the Structure Plan. In so far as sites for development for residential purposes are identified in the Plan, they are, with some exceptions in and around Guildford Town Centre and those for which planning permission has already been granted; listed in the Policies of the Section.

5.5.2. The Policies and some of their supporting Paragraphs attracted a considerable number of Objections. Of most significance in terms of the integrity of the Plan were those critical of the way the housing provision had been reconciled with the requirement of the Structure Plan, leading to a view that insufficient land had been allocated and prompting suggestions for further land to be added. Arguments about the practicability and likely housing yield in the Plan period of the identified sites also led Objectors to this conclusion.

5.5.3. The Council provided a Topic Paper (CD15) and a further note on housing land supply, while many of the house builders represented gave more detailed support for their Objections for the Housing Round Table which took place during the Inquiry. I was very grateful for this assistance.

POLICY 99H1

HOUSING PROVISION

Objectors

The Objections relating to Policy 99H1 are listed in Annex 1.

Background, Objections and Issues

5.5.4. The Policy indicated that provision would be made for an additional 1956 dwellings between 1 October 1998 and 31 March 2006. Paragraph 5.10 explained that this figure was derived from Policy DP4 of the Surrey Structure Plan 1994, whereby a net increase for the Plan area of 3800 dwellings was required between 1 April 1991 and 31 March 2006. The requirement was divided into two phases, the first extending to 2001, but as the date for the end of the first phase is close and any shortfall in the first would be carried forward to the second this appeared to have little significance at this time. Between 1 April 1991 and 30 September 1998 a net provision of 1844 dwellings had been made, leaving 1956 dwellings to be provided in the Plan period. Paragraph 5.11 explained how, at 1 October 1998, this figure was to be met.

5.5.5. Between the placing on deposit of the Plan and the Inquiry a revised version of PPG3 was published (March 2000). This suggested changes to the way in which the availability of land for housing development was assessed. Principally, it would rely on an urban housing capacity study being undertaken. Surrey County Council, in conjunction with the District Councils, had undertaken an urban capacity study in 1999, but advice as to how such studies should be undertaken was not published until December 2000 (after the Inquiry had closed) and the Council was understandably doubtful as to the usefulness of the County Council Study for the purposes of the Plan. PPG3 also introduced a sequential test as to where new housing should be located. In so far as the urban areas are concerned, the preferred location for new housing, it looked to the urban housing capacity study to identify the opportunities and the sites.

5.5.6. The timing of the new advice leaves the Plan between two stools, in so far as its provision for new housing development is concerned. The carrying out of an urban housing capacity study emerges as a priority. However, the three allocated sites are perhaps obvious candidates for selection in such a study. The "unidentified sites" present more of a problem as they are assessed on a basis of trends rather than survey, although the advised methodology also requires an assessment based on past trends as well as the windfall potential. Perhaps, in the future, capacity studies will identify more sites with potential for development and lead to there being fewer windfall sites. For the Plan as it stands I did not see the new advice as invalidating its methodology, if a somewhat different methodology will be required in the future.

Consideration

5.5.7. The importance of the figures included in the Policy and the reasoned justification to assessing the ability of the Plan to meet the requirements of the Structure Plan, and to arguments that further land should be permitted to be developed, required a close scrutiny of their accuracy and also of their flexibility in the face of the inevitable uncertainties in making allowances for the future. The calculations, which followed the form now long established in planning practice and deriving from Government advice, such as that of earlier versions as well as the current PPG3, are made up of a number of components and while it is important to remember that it is the sum of these components which produces the essential requirement, each has its particular considerations. These components are considered below.

(a) Residual requirement

5.5.8. In arriving at the residual requirement, as indicated above, it is necessary to deduct the number of dwellings built in the Structure Plan period that has passed to arrive at the figure still required, and to make any other adjustments necessary to relate the provision to be made by the Plan accurately to the Structure Plan. The figure changes almost daily and when the Plan is adopted the Council may wish to update this and other figures, but I have confined myself to the figures in the Plan as deposited.

5.5.9. The completions figure met some criticism, principally, it appeared, because there was some doubt as to how the figures were put together and whether dwellings not generally available had been included. The Council was confident that its figures were accurate and from the outcome of the discussion at the Round Table most Objectors present seemed satisfied and there was no reason to seriously doubt this element of the calculation.

(b) Housing Supply

(1) Identified sites with planning permission

5.5.10. This figure, as the completions figure, depended on the accuracy of the Council's records, particularly whether the dangers of double counting had been avoided. The problem in some Objectors minds was whether sites included as "unidentified" prior to planning permission being granted were removed from this category once included in that for sites with planning permission. Particularly this was seen to be a potential problem with the unidentified sites of between 0.4 and 1.0 ha.

5.5.11. The Council's Planning Monitoring Report (CD32) indicated quite clearly that this form of double counting did not occur and this appeared to be accepted by those taking part in the Round Table discussion.

5.5.12. In addition to the accuracy of the figure, there was concern as to whether some deduction should be made to allow for permissions, which, while granted might not be implemented in the Plan period, or at all. Research had been undertaken by Roger Tym and Partners for DOE as it then was into the take up rate of permissions once granted. It had been considered that the actual provision would be about 10% less than the number of dwellings permitted.

5.5.13. It would not be unusual to discount the figure for outstanding permissions by this percentage and to make further allocations of new land in recompense. This would give greater certainty of achieving the required housing provision and afford a valuable element of flexibility to the figures. The Council argued strongly against this, because with the passage of time it was possible to show that on 99% of the sites included in this category development had either been completed, or at least commenced. The high demand for housing and the small land supply available in the Plan area usually meant very high implementation rates.

5.5.14. In this instance, and exceptionally, it did not appear that there was a good reason for discounting the outstanding permissions figure, certainly by as much as 10%.

(2) Identified sites subject to a legal agreement

5.5.15. This relatively small entry in the Table related to sites for which the Council had resolved to grant planning permission, subject to a legal agreement being entered into. As with the outstanding permissions figure, a non-implementation allowance could be considered. In this instance, the figure related to a site in the Council's ownership and, at the time of the Inquiry, it appeared to have progressed to the stage at which the outstanding agreement had been signed, planning permission granted and work on the site was shortly to commence. It appeared that the housing gain would, in the event, be greater than the Table indicated.

(3) Sites allocated under Policy 99H2

5.5.16. The likely housing yield of the allocated sites raised a number of mainly site specific issues which are considered under the following Policy. Suffice it to say here that there were doubts about the availability and/or yield of the three allocated sites in the Plan period, from which would follow a need to allocate further land in substitution, or for reassurance that the Structure Plan requirement would be met. My conclusion on these matters was that not only was there a very good prospect of these allocations being implemented, in the case of the Barracks/Chart Depot site not only was there the prospect, but the Plan should accept the opportunity of providing marginally more housing on the site than Policy 99H2 indicated.

(4) Unidentified small sites (Less than 0.4ha)

5.5.17. This figure is necessarily based on past experience adjusted to take account of changes in the circumstances which may affect the smaller development sites coming forward. Paragraph 5.16 and the Housing Land Supply Topic Paper (CD15) indicated that an allowance of 80 dwellings per annum from this source had been made. This was based on the average contribution for the years from 1990 to 1998 and was equivalent to 50% of the rate achieved in the 1980s.

5.5.18. HBF accepted that the Plan was taking account of the fall in the contribution to housing coming from this source (and commented that the average was 78 rather than 80), but suggested that a better way of arriving at the appropriate figure was to use a five year moving average. In that way the continuing decline in the small site contribution that had taken place during the 1990s would be taken into account.

5.5.19. The HBF figures showed that the average for the 1990s was 75 dwellings per annum, but for the five year period from 1994 to 1999 it was 63 dwellings per annum. For the remainder of the Plan period it was thought that a reduction of 25% on the 1990s average would be appropriate, to 56 dwellings per annum.

5.5.20. PPG3 advises that the contributions from small sites should be taken into account, having regard to past trends in windfall sites coming forward for development. No further guidance is given, save that "greenfield" windfalls should not be allowed for and there should be an assessment of future windfall capacity in an urban capacity study, something that has yet to be completed for the Plan area. The HBF was advocating its approach for use by Councils generally in the preparation of local plans.

5.5.21. The small site windfalls formed an important part of the anticipated housing provision in the Plan period. There was agreement that at least up to now these have to be seen as a dwindling resource, in so far as they come largely from infilling and small scale redevelopments in the built-up areas where, inevitably, the most promising opportunities have tended to be utilised first. Probably, bearing in mind the planning policies that have applied, few opportunities arose from greenfield sites and fewer still could be anticipated in future. The interpretation of Green Belt policy as now set out in PPG2 in relation to the development acceptable in washed over or inset villages may also be a factor that would suggest caution in arriving at the small sites windfall figure. At the same time, the greater emphasis there will be on intensification and development on previously developed land in urban areas through the application of the sequential test of PPG3, paragraph 30, may tend to counter the opposing trends in areas where the housing market is as buoyant as it is in Guildford Borough.

5.5.22. The key to the problem seemed likely to lie in an urban capacity study of the sort envisaged by PPG3 and subsequent advice mentioned above. This would allow some assessment of the potential capacity of vacant and derelict sites and the opportunities for intensification. "Urban area" could be taken to include all built-up areas, including villages. No doubt the Council will be undertaking an urban housing capacity study which would allow a more certainly based assessment to be made of the housing provision that could be expected from unidentified sites as a whole. In the mean time, it was my view that while the figure for the smaller unidentified sites appeared optimistic, it was an acceptable one for the purposes of the Plan.

(5) Unidentified sites of 0.4 to 1.0ha

5.5.23. Much of what was said in relation to the smaller unidentified sites figure applies also to the larger sites, although it can be argued that these sites are likely to be more scarce and their occupance more open to variation. An urban capacity study would be likely to have an even greater significance in relation to these sites. HBF applied their five year moving average to the completion figures during the 1990s, for the period 1994 - 1999 arriving at 35 dwellings per annum. Reducing this by 25% to reflect that the rate was decreasing 30 dwellings per annum from this source was suggested, close to the Plan figure of 28 dwellings per annum arrived at by reducing by 50% the annual rates for the period from April 1986 to March 1995.

(6) Unidentified sites over 1ha

5.5.24. The Monitoring Report contained a heading for undetermined residential planning applications on sites larger than 1.0ha. This attracted some comment, but it was

clear that while it was useful for the purposes of the Monitoring Report, the figure had not been translated into the Five Year Housing Land Availability figures, nor was it a part of the calculation for the Plan. Such sites had, nevertheless, been a significant source of housing provision, the Council quoting that between 1990 and 1998 439 units had come forward from such sites. Even if recognised as a declining source and accordingly reduced by 50% there could be an average annual gain of 27 units. Current advice in PPG3 does not rule out inclusion of these larger sites, although it would expect their yield to be calculated through the urban capacity study. The Council suggested that this addition, if unquantified in the housing provision calculation, should be seen as adding to the housing potential of the Plan and providing something of the flexibility sought by Objectors.

(c) Choice

5.5.25. As well as providing sufficient dwellings it is axiomatic that the Plan should provide for a variety of dwelling styles, sizes, costs and locations to meet the requirements of those seeking housing in the Plan area. All three of the sites allocated for housing development are in the Guildford urban area. No sites were allocated for development in the other major urban area of the Plan, Ash/Tongham, or in the semi-suburban Green Belt villages of the eastern part of the District.

5.5.26. The sequential test of PPG3 puts the development of previously developed land and buildings in urban areas as the first priority in identifying sites to be allocated for housing, followed by urban extensions and finally new development around nodes in good public transport corridors. In the Council's view, the Plan was able to satisfy the housing requirement for the Plan period from sites that met the first priority. There was no obligation to identify sites above those that will meet the requirement to demonstrate the availability of a five year supply of developable land, or in this instance meet the requirements of the Plan period.

5.5.27. I accepted, however, that the size of the development envisaged on the Queen Elizabeth Barracks/8 Map and Chart Depot site was of a size that would enable a variety of housing to be provided. On this site and on others that might become available, other Policies of the Plan sought a mix of dwelling sizes and an element of affordable housing. A geographical spread, if not provided by the allocations, would be achieved through the identified sites with planning permission, which included a large element in the Ash/Tongham urban area, and from the windfalls.

Conclusions

5.5.28. In the Plan area an urban capacity study emerges as an urgent need as an assurance that the Structure Plan requirements can be met. That being said, while accepting that greater flexibility in the housing supply assessments is desirable, I consider that there is the likelihood that elements of the supply, such as the yield from the allocated sites, is underestimated and that elements not formally part of the calculation, the larger site windfalls, for example, if added give sufficient latitude to be reasonably sure that the supply will be adequate.

5.5.29. I have not, therefore, seen a need to recommend to the Council that further land should be allocated for development and my later consideration of individual Objection sites starts from this premise. Where among the principal issues was not allocation, but the accuracy of a settlement or urban boundary, I have regarded that as the principal issue, the effect a change might have on the availability of land with a potential for housing development remaining of importance, if in a secondary role.

5.5.30. The five year supply of housing land did not figure as a matter of great dispute. Had there been substantial inaccuracies in the figures considered above, then the supply could have been considered inadequate. However, I did not consider that to be the case.

CHAPTER 5. RECOMMENDATION 1.

5.5.1. That PC41 be made.

5.5.2. That consideration be given to updating paragraph 5.11 to convey the housing supply situation at a date closer to the adoption of the Plan.

POLICY 99H2 HOUSING PROPOSALS

5.5.31. The Policy set out the three sites allocated for residential development in the Plan, with an indication of the expected housing yields. The first two, Queen Elizabeth Barracks and 8 Map and Chart Depot were adjoining sites in the ownership of MOD and for practical purposes were treated as one site. The majority of the Objections relating to the Policy were to this site, or to the other allocated site, Bright Hill Car Park. A number of other Objections proposed additions to the brief list of sites allocated. Raising often local issues, these additional sites are considered separately.

- (a) Queen Elizabeth Barracks and 8 Map and Chart Depot, Little Street, off Grange Road, Guildford.

Objectors

5.5.32. This proposal attracted a considerable measure of support, but also a large number of Objections. The Objections fell into groups:-

- (i) Those concerned with the traffic and other implications of so sizeable a development in a closely built up and congested residential area, including suggestions that the development should provide fewer dwellings, more open space, community facilities and employment.
- (ii) Doubters that the development could deliver the housing proposed in the Plan period.
- (iii) Suggestions that the sites could satisfactorily provide more housing than the Plan proposed.

For the first two groups the Objectors are listed in Annex 1. The third group was primarily represented by:-

Objections 605,616,C18 Ministry of Defence.

Main Issues

5.5.33. The main issues to my mind were whether the development proposed by the Plan was acceptable in this location, having regard to the objectives of the Plan and the convenience and amenity of those living in the area and whether it could be achieved in the Plan period.

Consideration

1. Plan proposals

5.5.34. The Queen Elizabeth Barracks are relatively modern, consisting of a variety of service and residential buildings in a mainly open and well planted site of about 19.5ha. At the time of the Inquiry the WRAC had vacated the Barracks, although some buildings remained in military use. The Map and Chart Depot is a group of large and mainly single storey storage buildings, the site, of about 3.6ha, adjoining the Barracks and also containing quite large open and planted areas. The sites are in Stoughton, a northern suburb of Guildford, largely surrounded by modern housing development and served from Grange Road, one of the lesser radial routes of the town.

5.5.35. The Plan proposes that the two sites should together provide 450 dwellings. The Plan made mention of a development brief to be prepared by the Council, but by the time of the Inquiry this had been completed, envisaging a development providing the proposed number of dwellings, including an element of affordable housing, open space, employment and community facilities. The Council proposed Pre-Inquiry Changes to Paragraph 5.20 updating the reference to the planning brief (PC42) and to Paragraph 5.17, adding that the level of housing proposed by the Plan was considered to be the maximum the site could accommodate (PC168).

5.5.36. Policy 99M3, Location of Development, required that development generating a significant number of trips will only be allowed in locations highly accessible to public transport. Further Proposed Changes (PC227) included Park and Ride with public transport. The Council's development brief saw park and ride facilities to be required in the northern approaches to Guildford Town Centre, on a site identified by the developer and substantially funded by the development, to compensate for the added traffic the development would otherwise be likely to generate in Guildford Town Centre.

2. Suitability of the location

5.5.37. The sites are located in an existing urban area drawing the benefits of accessibility to the services and facilities, including public transport, the area already enjoys. The sites are land that has been previously developed, which, while they contain substantial

and attractive open areas, have not been generally accessible to the public. Development offers the opportunity to incorporate this substantial area into the local community and to make available some of its attractions for the public benefit. The sites fit easily in to the requirement that development should wherever possible be on "brownfield" land and offer the opportunities for development which is "sustainable", objectives of Government policy as well as of the Plan.

5.5.38. So large a development would have inevitable consequences for those who already live in the area, both good and bad. On the plus side, the development offers the opportunity to make greater provision for open space and community facilities. The "community facilities" could include a community centre, doctors surgery and childrens' nursery, together with other facilities mentioned by Objectors. Other Objectors saw the provision of such facilities as unnecessary, although a scheme of this scale has some need to cater for the community needs of the new residents and offers an opportunity to meet deficiencies in the area. The open space would provide for both formal and informal recreation, provide buffers to nearby development and preserve much of the best of the present planting. There was also an addition to local employment envisaged, contentious in the minds of some respondents, but again worth inclusion in a development of this scale and a substitute for some of the local employment that was no doubt lost when the Barracks closed. On sites of this size there seemed little reason to think that development need have any serious adverse impact on the amenity, privacy or the natural light enjoyed by those whose houses adjoin the site. The negative side of the proposal is principally represented by added traffic in an area already experiencing congestion.

3. Traffic generation and remedial measures

5.5.39. The traffic generation of the development had been an important consideration in the allocation of the site and arriving at an appropriate level of development. The development brief proposed that the access pattern and circulation within the site should distribute traffic widely onto surrounding roads. This would inevitably increase traffic flows on these roads, but the Highway Authority have suggested a number of improvements to the main routes traffic would use, principally to road junctions in the Stoughton and Bellfields area, that would allow the development to take place without an unacceptable detrimental impact. There was recognition of the need for traffic calming. The brief also detailed various improvements to pedestrian and cycle access to the area.

5.5.40. The site is well served by public transport, but a requirement of the brief would be for bus services and the means of access for buses to the site and to the area to be examined. This could involve providing bus lanes and other bus priority measures. Several Objectors raised the possibility of providing a station on the adjacent railway, not a proposal of the Council's brief, although a suggestion which could be further considered.

5.5.41. It was accepted that local traffic conditions would not make the sites suitable to accommodate a Park and Ride car park. The brief, however, sought "The provision of a fully serviced Park and Ride facility on the northern approach to Guildford town centre". The Pre-Inquiry Changes mentioned above provided a general if not specific policy base for this requirement. The Ministry of Defence objected that it was difficult to see how such a

requirement would meet the tests of Circular 1/97. A Park and Ride facility might help to compensate for the traffic generated by the development by reducing traffic from other locations using the approaches to Guildford from the north. It would, however, have no practical value to the development beyond this and was largely proposed to meet an already existing need for a Park and Ride facility on the northern approaches to Guildford for which no site was at present in mind. There would be improved public transport available to residents of the development which would in itself potentially reduce the use of cars to reach the town centre from the development and improve accessibility in the area.

5.5.42. In so far as the Plan is concerned, planning benefits, into which category the highway, public transport and the Park and Ride proposals would come, are dealt with in Policy 99G3. The advice of Circular 1/97 is clear and I have suggested in relation to Policy 99G3 that the basis on which benefits are sought as given in the Circular is accurately expressed in the Plan. Planning benefits are necessarily a matter for negotiation. The Council's planning brief is not a part of the Plan and the Plan itself quite properly makes no specific requirement in relation to Park and Ride facilities related to the sites.

4. Number of dwellings to be provided

5.5.43. The Plan gave an estimate of the capacity of the sites for the purposes of ensuring adequate land was available to meet the Structure Plan requirements. The Plan indicates that the final capacity of the sites will be decided after a detailed assessment. In the Council's view this was provided by the brief. In this the different uses required on the site were analyzed, including the desired mix of house types and tenures. Housing would be the predominant use and an overall net density of 32 dwellings per ha was suggested. The housing areas would be divided into a lower density area on the western side at 20 dwellings per ha, an area of undulating landform and extensive mature planting where larger houses in a more spacious setting could be accommodated, and the remainder of the site, where a density of 39 dwellings per ha would be employed.

5.5.44. These densities would bear a reasonable relationship to that of the development adjoining. The average density proposed at 32 dwellings per ha would be towards the lower end of the range suggested in PPG3 (paragraph 58) of between 30 and 50 dwellings per ha. To adopt the lower housing targets suggested by some Objectors would, in these circumstances, go against Government advice. Reducing the overall density of the areas to be given over to housing development, unless there was a corresponding increase in the housing area and a substitution of housing for other forms of development or open space, would require further land to be allocated to meet the Structure Plan requirement.

5.5.45. The Council's brief sought to preserve about one third of the site as open space of various sorts, a generous allocation. A site was not required for a school or other relatively large community user of substantially open land. An enlarged allocation for commercial or employment use would have traffic implications. It appeared, therefore, that the balance of development that the brief was aiming for was in principal a reasonable one. To reduce the housing element would not achieve any substantial planning advantages, while it could bring substantial disadvantages in a need to allocate land for development elsewhere.

5.5.46. The brief asked for 25-30% of dwellings to be affordable. Policy 99H11 refers to 30% of new housing being affordable and applied this level generally to the larger new developments in the Plan area. Some Objectors considered this too much, but this is the best opportunity in the Plan to achieve a sizeable contribution to the outstanding local need for affordable housing and should not be lightly passed up. There were also those who thought that the site should be used for retirement homes. The provision of such special accommodation would not be at variance with the brief and more feasible as part of a mixed development of the scale envisaged by the Plan.

5.5.47. The Ministry of Defence considered that rather than 450 dwellings being seen as a maximum for the site, this should be left open as in the Plan without the change proposed by PC168. As the Plan originally indicated, the final capacity of the sites should await detailed examination and the preparation of actual schemes of development. This refining of the provision was more for the process of development control than for the Plan. Schemes prepared on their behalf, and, as I understood it, translated into a planning application, indicated that it would be feasible to provide a development meeting the main terms of the Council's brief while accommodating of the order of 500 dwellings.

5.5.48. In an overall policy sense, the density proposed in the Council's brief arguably does not make the best use of this major brownfield site in terms of the housing gain being made. Its density includes an area well below the density recommended by PPG3, while the average density is at the lower end of the PPG3 range. To increase the yield from the site would be appropriate, particularly if there were no very significant disadvantages from doing so.

5.5.49. There were criticisms that the MOD proposals kept less open space and lost more trees, although this did not necessarily seem to be the case from the examination of the smallscale drawings provided in connection with the Council's brief and the MOD scheme. They would need to be worked up in more detail for any real comparison to be made in these respects. More telling at this stage would be the traffic implications of a modestly larger scheme and in the MOD view this could be accommodated within the scope of the traffic and public transport improvements proposed. The Highways Authority was unwilling to say that it could not be accommodated without a much closer study of the implications.

5.5.50. My view was that no reduction should be made in the anticipated housing yield from the sites and while no increase should be made to the figures in Policy 99H2 (even though it would add to the flexibility in the housing provision of Policy 99H1) Paragraph 5.17 should be left in its original form without the addition of PC168.

5. Feasibility of development in the Plan period

5.5.51. A number of Objectors cast doubt on whether the site could be developed, or fully developed in the Plan period. Examples of other MOD land where release from service use had been slow and uncertain were mentioned. In this instance, it appeared that the sites were already substantially vacated and the principal occupiers remaining had been found alternative accommodation. There was no indication that other service uses were seeking to

move in. MOD had appointed agents to handle the disposal of the site, who reported a keen interest from house builders.

5.5.52. Clearly there would be needs for infrastructure improvements, but I was given no indication that they would be a serious constraint or lead to delay in the start of development. I understood that a planning application had already been made and while there will no doubt be other applications to be dealt with, the only "administrative" snag seemed likely to be negotiations on the planning benefits the Council was seeking, particularly the sizeable contribution to Park and Ride facilities.

5.5.53. The scale of development could lead to development being phased, to avoid too great a release of housing on to the local market in a short period. This, however, seemed probably to be unnecessary in the context of the local housing market and unlikely to extend the completion period beyond that of the Plan. In all, with the site in single ownership, available and with no significant constraints to development I saw no reason to suggest either that the site should not be included in the allocations or its contribution to the housing provision in the Plan reduced.

6. Other matters of Objection

5.5.54. My concern is with the principal of allocating this site in the Plan, that it is practical, that the housing gain anticipated is likely to be achieved and that this can reasonably be expected in the Plan period. The detail of the development and the requirements that will make it fit comfortably into its surroundings have been considered in relation to the Council's development brief, on which there has been public consultation, and will be considered in greater detail in relation to the planning applications. The Objections were wide ranging, many of them concerned about matters that are more properly considered in relation to the brief or the planning applications.

5.5.55. Some other matters raised by Objectors have been touched on above or in relation to other parts of the Plan. I could appreciate that a number of people did not want Stoughton, already a densely developed part of the town, built up further. The advice of Government and the objectives pursued by the Plan, however, lead development to a site such as this which has such good sustainability credentials. The problems of developing further in an area already developed have been recognised and the balance suggests that the development could aid rather than further detract from the quality and character of the area. The availability of public transport was commented on by some respondents. As a part of the incidental requirements, development could significantly improve public transport frequencies and freedom of movement, to the benefit of all living in the area.

5.5.56. Comment was made on the environmental value of the site. At present largely vacant and unused this was notable at the time I visited the site. Some changes are inevitable with development, but there is in the brief, as there was in the proposals put forward by MOD, considerable attention paid to keeping much of the open space, the landscaping and the trees.

5.5.57. Some Objectors thought that some of the existing buildings should be reused, noting that many of them are modern and well designed. That may well prove practicable for some buildings, although having been built to provide accommodation of a specific type many probably could not be adapted, while preserving the buildings might seriously limit what could be done with the site.

5.5.58. Concentrating so much of the housing provision proposed on a single site has some implications for the choice available to those seeking homes in the Plan area. I have commented earlier that the size of the site allows a variety of dwellings to be provided in terms of size, style and tenure and this is fundamental to the Council's brief as well as a requirement of Other Policies of the Plan. Other elements of the housing provision proposed by the Plan add to the choice that will be available.

Conclusions

5.5.59. The Plan is fortunate in being able to meet practically the whole of its housing needs from brownfield sites in highly sustainable locations. I had no doubt that the sites offered the opportunity for development that would be satisfactory in itself, but offer gains for the local community that could outweigh the inevitable disadvantages of undertaking development on a substantially open site in the heart of a busy urban area.

5.5.60. I saw no difficulty in achieving the development in the Plan period, nor in making a start that would allow a significant contribution to the five year land supply. At this stage, the Council's planning brief notwithstanding, I consider that the final housing provision should be left to a detailed scheme and the possibility of achieving a greater housing gain from the site than the Policy indicates not removed.

(b) Bright Hill Car Park, Bright Hill, Guildford.

Objectors

<i>Objection 518</i>	<i>Guildford Diocesan Board of Finance</i>
<i>Objection 766</i>	<i>Gleeson Homes</i>
<i>Objection 793</i>	<i>The Guildford Society</i>
<i>Objection 853</i>	<i>Mr E F T Cribb</i>
<i>Objection 1109</i>	<i>Mr S Brooks</i>
<i>Objection 1423</i>	<i>Mr A Johnson</i>
<i>Objection 1795</i>	<i>Mr A E Rees</i>
<i>Objection 1946</i>	<i>East Horsley Parish Council</i>

Background and Objections

5.5.61. The Objections were principally that this existing car park serving Guildford Town Centre and the nearby Sydenham Road Adult Education Centre should remain a car park, perhaps being developed to provide more car parking, but not used for housing. The proposals having been carried forward from the adopted Plan, there was also doubt that development would take place in the period of the Plan.

5.5.62. The Bright Hill Car Park occupies a site on the south eastern side of Sydenham Road bounded by Bright Hill on the south western and south eastern sides. At the time of the Inquiry it remained operational providing about 110 parking spaces. The land rises sharply from Sydenham Road, on the frontage to which, lapped round by the car park, is the Robin Hood Public House. The Plan envisages 33 dwellings being provided on the site.

Consideration

5.5.63. The site meets the requirements of sustainability, being previously developed land close to the town centre and its facilities and public transport services. To the north is part of the site of the Royal Grammar School. To the south Sydenham Road marks the boundary of the Town Centre, with the adjoining predominantly residential area and while, the Education Centre is to the east, there appeared to be no environmental or amenity reasons not to consider the site as suitable for housing. The slope of the site did not appear to give serious reasons to consider the site could not be developed.

5.5.64. The site performs a valuable function for the Town Centre and the adjacent Education Centre. Shorter term car parking is at a premium in the Town Centre and there is a need to consider whether the viability of the town centre or the need for housing should prevail in this instance. However, the recent completion of the refurbishment of a multi-story car park in Sydenham Road only a short distance to the west, while it would not replace the spaces lost at Bright Hill, does remove some of the imperative to retain the car park at Bright Hill. The Council was satisfied that the loss of the car park would not run counter to the objectives of the Plan to foster the shopping and other commercial activities of the Town Centre. Adequate short term parking space would remain.

5.5.65. The site had been allocated for development in local plans since 1987. An outline planning permission granted in 1995 had lapsed. I was not told of any current applications or developer interest in the site, but I was willing to accept that the new emphasis on seeking land in urban areas to meet housing requirements, the convenience and attraction of the site and the completion of the refurbishment of the nearby car park would afford a good chance that development could be expected now to take place and that it was reasonable to include the site among the allocations.

5.5.66. It was noticeable that the reasoned justification made no reference to the Bright Hill site. While not strictly a "new" site, the history of non-development following previous allocation would appear to justify a comment as to why it is expected now to be developed and the form that development might take. There was reference at the Inquiry to the possibility that some car parking might be retained. Not being confident of the detail I have not suggested a wording.

Conclusions

5.5.67. Despite its history, I saw no reason to consider that this site is now unlikely to come forward for development, or that the loss of all or part of its contribution to the town centre's short stay parking provision would have unacceptable implications for the Town Centre's vitality or viability. Accordingly, I consider allocation appropriate and ask only

that the Plan include some explanation of the change in circumstances surrounding its availability for development.

CHAPTER 5 RECOMMENDATION 2.

5.5.3. That PC168 be NOT made.

5.5.4. That a further paragraph be added to the reasoned justification outlining the form of development anticipated and the circumstances now likely to result in the Bright Street Car Park site being developed in the Plan period.

(c) Sites proposed by Objectors for allocation.

5.5.68. Objectors proposed a number of additional sites for allocation under Policy 99H2. In most instances this was in support of the belief that insufficient land was identified under Policy 99H1 to meet the requirements of the Structure Plan for the Plan period. For allocation, many of the sites suggested would also imply removal from the Green Belt, inclusion in the urban area rather than the Countryside Beyond the Green Belt designation, or would give rise to some other conflict with allocations or Policies of the Plan.

5.5.69. I have concluded in relation to the previous Policy that, taken together, the proposals of the Plan will provide sufficient opportunities for new housing development in the Plan period to meet the Structure Plan requirements. There is no need on this ground to allocate more land for housing, to adjust the boundaries of the Green Belt or take land from the Countryside Beyond the Green Belt. While the present favourable housing land situation may not continue into future plan periods, I regarded it as premature to seek to identify land at this time to meet future needs. I recognised that the Countryside Beyond the Green Belt designation may be looked at as a reserve of development land for the future, but it was equally clear that there were objectives in the Structure Plan, carried forward into the Plan, for the protection of this land as countryside. It was my view that meeting future housing needs was something to be looked at comprehensively in the context of the scale of the need and the strategy of the time.

5.5.70. The sites proposed in Objections to the Plan are considered at several different places in the Report. The need to allocate more housing land not being an issue, the main considerations in many instances were whether the boundaries of the urban areas or Green Belt settlements were accurately drawn. Accordingly, the main consideration of many of the Objections is related to Policy 99RE3 and Policy 99RE4 in Chapter 10. In other instances the main issues were whether land should be retained in an existing use, in accordance with the various Policies of the Plan, or allowed to be used for housing. The sites below are ones where there was a specific Objection to Policy 99H2.

1. Land at Aldershot Road and Frog Grove Lane, Wood Street

Objector

Objections 11,12

Mr T Sines

5.5.71. Mr Sines' Objections were concerned, on the one hand, with the perceived effects of overdevelopment, traffic hazard and congestion that would result from the proposals for the Queen Elizabeth II Barracks/Map and Chart Depot site, considered above, and, on the other, made a proposal that land at Wood Street might be developed in preference.

5.5.72. The land in question was a substantial site fronting onto Aldershot Road to the north and Frog Grove Lane to the east. It is currently predominantly woods and farmland with a few dwellings towards its western end. The opposite side of Frog Grove Lane contains a ribbon of dwellings extending southwards to form part of the small settlement of Wood Street and there is some further development to the east in Aldershot Road. Normandy is a mile or more to the west. The area is otherwise countryside with a wholly rural aspect, forming part of the Green Belt. Normandy, but none of the other local settlements, is accorded a settlement boundary in the Plan.

5.5.73. I have not considered that the developed proposed by the Plan for the Barracks site is inappropriate in terms of location or the amount of housing proposed, rather I would see greater use being made of this opportunity. The Objector did not make very clear what the comparative advantages of the site proposed for housing development were seen to be. It might provide a similar level of new housing, including affordable housing, as the Barracks site. It is, however, greenfield and unrelated to any substantial existing settlements where an adequate level of services and facilities might be available. In sustainability terms, the test for new housing development in the Plan, its credentials are poor, with little apparent opportunity for significant improvement. I could see no justification in housing need or the merits of the site for the allocation under Policy 99H2, or removal of the Green Belt notation from the site.

2. Nelco Works, Station Road, Shalford

Objector

Objection 35

Glenn House Estates

5.5.74. Shalford is one of the more substantial villages of the Plan area and, although washed over by the Green Belt, it has a settlement boundary identified under Policy 99RE3 permitting modest further development. Nelco Works occupies a central position in the village, on the southern side of Station Road and with access to Kings Road further to the south. At one time the factory of a firm making electrical goods, the former buildings, of up to three stories, are now occupied by a number of manufacturing and service undertakings. Comprising about 0.25ha, the site is adjoined by development that is predominantly residential.

5.5.75. In general terms, the Plan would permit the redevelopment of the site for residential purposes, if the requirements of Policy 99E3 were met, a Policy directed to protecting existing employment land. This Policy would oppose redevelopment other than for employment use, unless, to paraphrase its requirements, there was demonstrably no need for the site in employment use, or the site was unsuitably located for continued employment use in terms of its environmental, traffic and other sustainability and amenity impacts.

5.5.76. In these respect, it was evident that the premises were serving a valuable employment purpose at the time of my visit and it did not appear that the premises could be considered redundant. In sustainability terms, the site is in the centre of a well served village and within a short distance of the railway station, considerations as important to an employment use as a residential site. Although the Objectors took a different view, the Council saw the activities of the site occasioning no serious loss of amenity to those living nearby. The site and the neighbouring houses had long been together and there had been no complaints to the Council in recent years. Congestion in Station Road was accepted to be a problem, but it was considered that not all of the parking could be attributed to the site, much of it was by residents, or visitors to the Kings Road shops and businesses, where there were parking restrictions. A residential development of the site would in all probability make little reduction.

5.5.77. The purpose of the Objection was for the land to be allocated for housing. I saw no need for that to be done. The future of the site was as much a matter for development control as for a precise decision in the Plan, in which the relevant policy issues are clearly set out. I recommend no change to the Plan in so far as a specific identification of this site or definition of its future use is concerned.

3. Catteshall site, Godalming

Objector

Objection 143

Standford Properties Ltd

5.5.78. The Objection related to land on the southern boundary of the Plan area immediately to the north of the settlement of Catteshall, an extension of Godalming in Waverley District. The land is in the Green Belt and AGLV.

5.5.79. The site, of about 3.63ha, is open land, close to the River Wey, in part an SSSI. There is modern development to the south and on part of the western boundary. Were there a need to identify more housing land, this could be a site to be taken into consideration, but I have not seen such a need and, for reasons given earlier, see no reason at this stage to attempt to preempt future decisions on the location of development by the identification now of land for possible development in future Plan periods. As things stand, the Green Belt notation is an appropriate one, no change having been suggested in the Structure Plan at this point, and development for housing would not be an acceptable use. I suggest no change in respect of this land.

4. Land between Marlborough Gate and Sendmarsh Road, Send Marsh

Objector

Objection 206

Alfred McAlpine Homes & Trenfold Ltd

5.5.80. This Objection is considered with other Objections relating to the site under Policy 99RE3 in Chapter 10.

5. Land at Warren Farm, Ash Green

Objectors

Objections 271-3, 276, 278/9 Mr J Sawyer & Mr P H Munday

5.5.81. The Objections related to a number of the Policies of the Housing Chapter and in proposing that a settlement boundary be drawn for Ash Green and the allocation for housing of land shown in the Plan as Countryside Beyond the Green Belt, Policy 99RE4. Warren Farm is located on the southern edge of Ash Green, with access from White Lane, the land in the Objections (about 3.13ha) extending behind houses in White Lane and Hazel Road.

5.5.82. I have said above that I do not consider that there is a need to allocate more land than is proposed in the Plan for housing in the Plan period. I have also concluded that, although my predecessor came to a different view, in the present context Ash Green should not be made an "identified settlement" in the Countryside Beyond the Green Belt designated area. I recognised that the site was well enclosed by trees as well as the adjoining houses. However, applying similar criteria to those used for defining the boundaries of Green Belt settlements, had a settlement boundary been drawn for Ash Green this is not land that would have qualified for inclusion. The site is too extensive for development to be the modest infilling that would have been envisaged and it is in any case beyond the built extent of the settlement and more of the surrounding countryside than the settlement itself.

5.5.83. An aspect of the Objections was that if allocated the site could provide affordable housing in accordance with Policy 99H11. That Policy lists the allocated sites, with the expectation that 30% of the housing on each site would be "affordable". Were the site allocated, or otherwise came forward for development, this Policy would seek to secure an element of affordable housing, but it is not in itself a justification for the allocation of the site when there is no overall need for further land to meet the Structure Plan requirement. Policies 99H4, 99H6 and 99H9 were also mentioned in the representations. The first relates to housing in urban areas and even had a settlement boundary been defined, Policy 99H4 would not have applied. The other two Policies refer to the replacement or extension of dwellings in the countryside, which apply to the site as it stands. I have not identified grounds to consider these Objections further.

6. Land at Manor Farm, East Horsley

Objector

Objection 439

Bewley Homes Plc

5.5.84. The Objection, seeking the allocation of this site under Policy 99H2, was withdrawn, but a further Objection relating to the settlement boundary of East Horsley in relation to this land is considered under Policy 99RE3 in Chapter 10.

7. Land and buildings at Tannery Lane, Send (Crack Processing Mills or Commercial Works)

Objectors

Objection 563

Wey Estates

Objection 1138

Barratt Southern Counties

5.5.85. The Objections related to industrial premises in Tannery Lane, including land between the River Wey Navigation and Broadmead Cut. The suggestion was that the land be allocated for housing, although other Objections suggested changes to the Plan that would permit the redevelopment of the site for housing or a mix of housing and employment uses.

5.5.86. The site adjoins a small, loosely developed residential area to the north, but is otherwise in a rural situation well separated from Send and the other main settlements of the area. Although brownfield, I saw no need to allocate further land for housing and was conscious of the shortcomings of this site in terms of services and accessibility. It is within the Green Belt. In Chapter 10 I agree with the Council that the site is too small to qualify as a Major Developed Site in the Green Belt.

5.5.87. During the course of the Inquiry, the Council was in discussion with the Objectors as to the future of the site and, I was given to understand, was willing to agree that a redevelopment for employment and residential use might take place, if the result was to reduce the impact of the site on the openness of the Green Belt. This appeared to presage an application, when a case would be made in respect of the special circumstances of the proposal, notably the outmoded character and unsightliness of the buildings. The timing and the basis of the application would appear to require no specific changes to the Plan. I, therefore, make no recommendation in respect of the allocation of this site, but consider the Council to be free to introduce an appropriate paragraph or Policy change to take the anticipated development into account, if it is considered necessary.

8. Land at Foreman Road, Ash

Objector

Objection 632

Mr F J Alexander

5.5.88. This triangular shaped field between Foreman Park and Foreman Road is considered under Policy 99RE4 in Chapter 10.

9. Land at Ash Green Lane, Tongham

Objector

Objection 642

Laing Homes

5.5.89. The land of this Objection, two fields on the eastern edge of Tongham to the south of Ash Green Lane West and behind properties in Manor Road, is considered under Policy 99RE4 in Chapter 10.

10. Lysons Avenue Site C, Ash Vale

Objector

Objection 1089

Guildford Liberal Democrats

5.5.90. This site is one of two sites allocated in the Plan for employment use in the Lysons Avenue employment area. Site C is the overgrown site of a former house situated between existing industrial premises and the northern edge of the Avondale residential estate. The employment use of this site is considered under Policy 99E1 in Chapter 6. Noting the environmental arguments against extending employment uses closer to the residential area, I have, nevertheless, concluded that the allocation of the Plan is appropriate and the use of the land for employment to be preferred in terms of the needs of the Plan area.

11. Land East of Glaziers Lane, Normandy

Objector

Objection 1106

Mr S Brooks

5.5.91. The Objection site is a field on the eastern side of Glaziers Lane adjoining the railway and close to Wanborough Station. The site is considered under Policy 99RE3 in Chapter 10.

12. Land rear of South Lane and Lodden Way/Ash Lodge Drive, Ash

Objector

Objection 1185

Howard Hutton & Associates

5.5.92. In its submitted form the Objection referred to two areas of land on the southern edge of Ash, the larger containing the smaller. The smaller area included Nos 52 and 54 South Lane and at their rear a triangular shaped area in part used for various commercial purposes, although its southern extremity was largely overgrown, if containing some semi-derelict buildings that had clearly been in some commercial uses at some time in the past. The larger site added fields to the west and south. The larger site was not pursued at the Inquiry.

5.5.93. The smaller site had an area of about 1.4ha. In sustainability terms, the site offered the same advantages of a reasonable proximity to services and facilities to be found in the adjacent residential areas. The site could also be considered to be "brownfield". I have not seen a need to allocate more land for housing in the Plan period, but I saw the definition of the urban area in this part of Ash as an issue to be taken into account in this instance.

5.5.94. The Plan does not set out the criteria for defining the urban areas, as opposed to the identified settlements in the Green Belt, but as a policy guided definition I could accept that not only should land included be "urban" in character and use, the definition should not offer opportunities for development that would be above those required by the Plan or impinge on other objectives, such as achieving "sustainability", the preservation of the identity and separation of settlements and the protection of the countryside.

5.5.95. The urban boundary in this part of Ash has been influenced historically by the proposal for an Ash Bypass. Now abandoned, the ghost of that alignment is still evident on the Proposals Map, not least in the vicinity of the Objection site. However, some changes to the urban boundary have been made, largely to accommodate developments that have taken places in the area since the adopted plan was drawn. These have particularly affected land to the east of South Lane. I have recommended that the site of "Walton", 3 Wandle Close (considered under Policy 99RE4, Chapter 10) be included in the urban area, together with properties on the western side of South Lane to the north of this Objection site.

5.5.96. In making that recommendation I considered that this Objection site and South Lane to the south were of a different and more rural character and not therefore to be included. The two houses and the access to the land at the rear made a break in the development on the western side of South Lane; the development further south appeared more spacious and rural, in no small part because there was land behind that was well treed or open and, apart from a short length where the Charles Church development was opposite, there was open land to the east of Church Lane also.

5.5.97. That land is "brownfield" is not necessarily an indication that it is also urban. The commercial uses on the northern part of the site were housed in single storey buildings

of positively rustic appearance, among trees. One of the dominant activities was connected with the storage and splitting of logs, a largely open use. With the largely overgrown land of the southern part of the backland area, the site had much of the countryside about it and did not to my mind justify an "urban" definition.

5.5.98. It may be that in future Plan periods there will be a need to identify further land for development. Having regard to the needs of the time, the brownfield nature and location of this land on the edge of the urban area may lead it to be considered with other land that could be made available. At this time, however, I see no need or justification to recommend allocation of the site or its inclusion in the urban area.

13. Land east of Manor Road, Ash

Objector

Objection 1217

Myddleton Developments Ltd

5.5.99. The site, No 57 Manor Road and land to the rear of adjoining houses on the east side of Manor Road, is considered under Policy 99RE4 in Chapter 10.

14. Merrow Kitchen Gardens, Merrow

Objector

Objection 1286

*Guildford Sunset Homes/Estate Trustees of the Poyle
Charity Guildford*

5.5.100. The Objection site is situated to the east of and largely behind properties in Merrow Street, Goldfinch Gardens abutting the eastern side. The site is within the urban area of Guildford and, on the face of it, the Plan would not oppose residential development, something confirmed by the Council. It appeared that there have been earlier applications for development, which have come to nought for reasons to do primarily with providing a satisfactory access.

5.5.101. The Objection sought allocation of the land under Policy 99H2, and I could see no very strong reason against that, if there were the reasonable certainty that the site would be available for development in the Plan period. Allocation would not make the constraints to the development of the site any the less and the experience so far suggest that these are considerable. The uncertainty, to my mind, argues against allocation. Were the site to come forward, its contribution to the housing provision would reasonably count among the windfalls.

15. Land at Liddlington Hall Farm, Guildford

Objector

Objection 1416

Merrist Wood College

5.5.102. The removal from the Green Belt and allocation of the land for housing is considered under Policy 99RE1 in Chapter 10.

16. Kingston House, Poyle Road, Tongham

Objector

Objection 1637

C J C Wing Trust

5.5.103. The Objection site is on the northern side of Poyle Road, the frontage the site of Kingston House and the greater part of the site a former orchard lapping behind the neighbouring houses and extending westwards to The Cardinals. The northern and eastern boundaries adjoin fields. I was aware that my predecessor recommended the allocation of the site, to meet a shortfall in housing land at that time. The recommendation was not accepted by the Council and a subsequent appeal against the refusal of permission for residential development was dismissed.

5.5.104. I do not consider that I have a need to identify more housing land for the Plan period and, therefore, make no recommendation in respect of this site. Other aspects of the proposal are considered under Policy 99RE4 in Chapter 10.

17. Former Burt Boulton Depot, Send Road, Send

Objector

Objection 1758

Burt Holdings Ltd

5.5.105. The former depot stands on the northern side of Send Road in a position quite central to the village. The front part of the large, rectangular site contains buildings and hard standings, the northern part being a field. For reasons given earlier, I do not consider that there is a need to allocate more land for housing for the Plan period. I have, however, considered the settlement boundary for Send in relation to the site - in the Plan it is wholly excluded - under Policy 99RE3 in Chapter 10.

POLICY 99H3

HOUSING/OPEN SPACE

Objectors

Objection 217

Surrey County Council

Objection 234

GOSE

Objection 1405

Bewley Homes Plc

Objection 1477

Richard Stephens

Objection 1496

Beazer Strategic Land

Objection 1691

The College of Law

Background, Objections and Issues

5.5.106. The Policy identifies three sites in the Guildford urban area. The supporting paragraphs indicate that they are open land which is currently underused and offer the opportunity for some residential development, along with the provision of recreational open space. Where the Council is the owner of the site, the intention is that all of the housing will be "affordable".

5.5.107. The Objections raised two principal matters, the somewhat vague way the Plan was identifying these sites, without specifying the likely housing gain, and the loss of open space these proposals would entail.

5.5.108. The main issues were whether there would be an unacceptable loss of recreational open space and the technical one of whether the Plan presents the proposals in the best way.

Consideration

5.5.109. Having regard to the first issue, the sites were identified from the Council's survey of open space in the urban area undertaken early in 1997. The site at Bushy Hill was owned by Surrey County Council and the other two by the Council. All three sites were undeveloped and, apart from the allotments, the sites were not generally available for the recreation of local people.

5.5.110. PPG3 encourages the reuse of vacant or derelict land in urban areas in preference to the development of greenfield sites and if there is no need for these sites to be used for open recreational purposes the proposals would be in accord with advice and offer the opportunity for sustainable residential development. Planning permission had been granted for a mixed housing and open space scheme for the County Council's site. The Council's Monitoring Report suggested that 22 dwellings were envisaged. The Great Goodwin Drive site is relatively small, triangular in shape adjoining the railway. Objectors pointed this out as a limitation to what might be achieved on development, either by way of open space or housing, but this was not in itself an argument against the proposal.

5.5.111. The Woodside Road Allotments are by far the largest site and if not all of the plots are occupied, some two thirds are in cultivation. Policy 99R5 protects existing open spaces, including allotments, although in this instance it was argued that there was not the demand in this part of the town to ensure occupation of the whole site. The Council proposed an addition to Paragraph 5.21 that would make it clear that the fully occupied part of the site was not under threat from the proposals (PPC43) and the proposal to develop all or part of the remainder appeared a reasonable one.

5.5.112. The essence of the second issue was whether these sites should have an assessment of their housing capacity made and be included in Policy 99H2, with their potential housing gains among the allocated sites rather than the windfalls figures of the calculation in Policy 99H1. It is normally recommended that Plans should be as precise as possible in identifying land for development and in the calculation of housing provision. If

the planning permission granted for the Bushy Hill site is any guide it may be that the three sites could yield 60-100 dwellings.

5.5.113. However, I can accept that if the objectives for the retention and provision of new open space for public use are to be applied to these sites, when they will be providing open space for more than the developments proposed on the sites themselves, arriving at satisfactory schemes and thereby the likely number of dwellings may not be straight forward. The Plan might in consequence be selling itself short in terms of the housing provision it is making, but in this instance the Policy may be the best that can be done to identify land with a potential for some development without attempting to quantify what might be achieved at this stage. The second addition to Paragraph 5.21 (PC43) helped to explain that.

CHAPTER 5. RECOMMENDATION 3.

5.5.5. That PC43 be made.

POLICY 99H4 HOUSING IN URBAN AREAS

Objectors

<i>Objection 273</i>	<i>Mr J Sawyer & Mr P H Munday</i>
<i>Objection 676</i>	<i>Rank Leisure</i>
<i>Objection 795</i>	<i>The Guildford Society</i>
<i>Objection 1146</i>	<i>Mr M J Dawson</i>
<i>Objection 1280</i>	<i>Robert Shaw and Partners</i>
<i>Objection 2040</i>	<i>GOSE</i>

Background and Objections

5.5.114. The Policy indicates that residential development will be permitted in Guildford and Ash/Tongham, the two "urban" areas identified by the Plan, subject to meeting three criteria relating essentially to neighbourliness and amenity. The Objection of Mr Sawyer and Mr Munday related to the inclusion of Ash Green in the second of these urban areas and is considered later. Other Objections were concerned with the criteria, although two referred to the mention of "gated" estates in Paragraph 5.22.

Main issues

5.5.115. The issues that arose were whether it was necessary to include the Policy in the Plan and, if so, whether the criteria, and the indications of policy in the supporting paragraphs were appropriate.

Consideration

5.5.116. The urban areas are not defined by the Plan, they are areas to which other more restrictive policies, such as the Green Belt and the Countryside Beyond the Green Belt

policies, do not apply. They are areas left uncoloured, although within them and reasonably seen as part of them are sites identified for various purposes. While it is probably obvious to anyone using the Plan where it should apply, it remains that this Policy is not related to a denoted Policy area shown on the Proposals Map.

5.5.117. This problem could be rectified by drawing a boundary for the urban areas of Guildford and Ash/Tongham, or the addition of the uncoloured area to the Key, which might be useful in relation to other proposals of the Plan. However, this Policy repeats in its three criteria matters also covered by Policies 99G1 and 99G2. On the assumption that in the urban areas there are no Policies preventing residential development if the General Policies are complied with it seems unnecessary to include a permissive Policy which draws attention to only three of the general considerations.

5.5.118. If it is considered that the Policy should remain in the Plan, there is reason to look again at the criteria. In the first, "overdevelopment" may be a convenient shorthand normally understood, but is not essential if the requirement is left as "Is in scale and character with the area". In the second, "adverse" should be qualified with some word such as "unacceptable" or "serious". In most cases there would be likely to be some adverse effect and the deciding test would be whether it was acceptable having regard to the circumstances and the degree. A similar point arises in relation to the third criterion. There was also criticism of the use of "existing context and character of the adjacent buildings and immediate surroundings". The General Polices express this matter at greater length and with greater accuracy as to its intention. However, I did not feel that the phrase was so likely to be misunderstood as to be wrong for the Policy.

5.5.119. The matter of gated estates arose in relation to Policy 99G1(5) and my comments there apply equally here. The statement in Paragraph 5.22 is a statement of policy and those Objectors who saw it best expressed as formal Policy of the Plan were right, at least in this technical view. As in the first instance, I see this advice best confined to Supplementary Planning Guidance and the further reference in Paragraph 5.22 to be unnecessary.

CHAPTER 5. RECOMMENDATION 4.

5.5.6. That Policy 99H4 be deleted.

5.5.7. If the Policy is to be retained:-

- (a) Consideration be given to defining the areas to which the Policy applies on the Proposals Map.
- (b) In the first criterion "AND AVOIDS THE ADVERSE EFFECTS OF OVERDEVELOPMENT" be omitted.
- (c) In the second criterion "SERIOUS" or "UNACCEPTABLE" be added before "ADVERSE".
- (d) In the third criterion "SERIOUS" or "UNACCEPTABLE" be added before "ADVERSE".
- (e) In Paragraph 5.22 the final sentence be deleted.

POLICY 99H5. RETENTION OF EXISTING HOUSING STOCK

Objector

Objection 216

Surrey County Council (CW)

5.5.120. The Policy attracted support and I see it as important for the Plan to have a Policy protecting the existing housing stock in circumstances in which achieving satisfactory new housing development is difficult. The single Objection related to the implication of Paragraph 5.25 that only dwellings lost to commercial development would need to be replaced. Structure Plan Policy DP7 reflected the intention that all housing lost to development should be replaced. The Council responded by proposing the deletion of "commercial" from the Paragraph to meet this point (PC44).

CHAPTER 5. RECOMMENDATION 5.

5.5.8. That PC44 be made.

POLICY 99H6. REPLACEMENT DWELLINGS IN THE COUNTRYSIDE

Objectors

Objection 220

Robert Shaw and Partners

Objection 272

Mr J Sawyer & Mr P H Munday

Objection 1096

Mrs S Greenleaf

Objection 1530

Loseley Estate

Objections 1647-9

Country Landowners Association

Objection 1860

CPRE Surrey

Objection 2059

GOSE

Background, Objections and Issues

5.5.121. The Policy generally permits the replacement of dwellings outside the urban area of Guildford and Ash/Tongham, that is to say in the villages and the open countryside as defined by the Plan. The Policy sets out four criteria to be met, 2-4 being much the same as those to be found in the General Policies. The first seeks to protect the existing stock of small dwellings, in the interest of maintaining a balance of dwelling sizes in those areas where new residential development is heavily constrained. In the Green Belt, outside the identified settlements, the Policy contains a presumption against any material enlargement on the replacement of an existing dwelling drawn from PPG2. A small dwelling is defined in the reasoned justification as one not exceeding 85sqm gross internal floorspace occupying a curtilage of 0.13ha or less.

5.5.122. The Objections raised the question of (1) whether a small dwellings policy such as this was required, and (2) whether the Policy was properly worded to achieve its objectives, similar points being raised as in relation to the criteria of Policy 99H4. The

Objection of Mr Sawyer and Mr Munday concerned the status of Ash Green and is considered elsewhere.

Consideration

5.5.123. Issue 1. The Council pointed out that PPG3, paragraph 9, requires local planning authorities "to adopt policies which take full account of changes in housing needs in their areas and which will widen the range of housing opportunities to allow these to be met". Much of the growth in demand for housing has been from increasing numbers of smaller households. In the rural areas, where there have long been policies restricting new housing development, but a strong demand for dwellings, there has been a tendency for small dwellings to be replaced by dwellings of greater size. While in Guildford this may not be as significant in terms of dwelling costs as in other parts of the Country, the result of the trend has been to decrease the numbers of small dwellings in the housing stock. Some authorities have seen such policies to be no longer required, particularly in the Green Belt, where PPG2 has reinforced policy against the enlargement of dwellings in general. Similarly, in other rural areas, where there have been new initiatives for the construction of affordable housing in sizes to meet local needs, a policy of this sort has been thought to be not necessary. However, I accept that PPG3 does give support to the inclusion of such a policy. That it should be expressed positively is to my mind appropriate.

5.5.124. Issue 2. I have the same doubts as to the inclusion of criteria 2-4 in this Policy as to the inclusion of the same criteria in Policy 99H4. They are repeating matters included in the General Policies which would also apply to the developments envisaged by this Policy, in ways that are in some respects less satisfactory. My view is that these criteria could be omitted, directing the Policy more to its prime objective, the protection of the small dwelling stock. If the last three criteria are to be retained, my earlier comments apply.

5.5.125. The Country Landowners Association criticised the small dwellings policy in general as lacking flexibility in relation to the particular individual circumstances of farms and other rural businesses, where it might be vital to the operation of the farm or business for accommodation to be enlarged to meet the needs of the operator. This Policy, as all others, would allow for the exceptional case as a departure from its provisions. The Council was prepared to indicate in Paragraph 5.29 that in application it would "exempt" dwellings with agricultural occupancy conditions from the small dwellings criterion (PC45 and PC49). I did not see that further was required.

5.5.126. The final paragraph of the Policy also gave rise to concern that it was lacking in flexibility. The Policy reflects with reasonable accuracy what is said in paragraph 3.6 of PPG2 and makes clear the approach the Plan is taking. Replacement dwellings are permissible provided they are not materially larger than the dwellings they replace. The Plan does not enlarge on what is material, and this is perhaps best judged in the circumstances of the individual case in relation to the objectives of the Green Belt.

5.5.127. The wording of this paragraph left me in some doubt and it appeared to me that it would be clearer if, after "existing dwellings", "with dwellings" were inserted.

CHAPTER 5. RECOMMENDATION 6.

5.5.9. That Criteria 2, 3 and 4 be omitted.

5.5.10. If Criteria 2, 3 and 4 are to be retained:-

- (a) In Criterion 2 "AND AVOIDS THE ADVERSE EFFECTS OF OVERDEVELOPMENT" be omitted.
- (b) In Criterion 3 "SERIOUS" or "UNACCEPTABLE" be added before "ADVERSE".
- (c) In Criterion 4 "SERIOUS" or "UNACCEPTABLE" be added before "ADVERSE".

5.5.11. That in the final paragraph of the Policy "WITH DWELLINGS" be inserted after "EXISTING DWELLINGS".

5.5.12. That PC45 and PC49 be made.

POLICY 99H7. CONVERSIONS.

Objectors

Objections 236,2060

Objection 252

Objection 513

Objection 701

GOSE (CW)

Cranley Road Area Residents Association

St Catherine's Village Association

West Clandon Parish Council

Background, Objections and Issues

5.5.128. The Policy is concerned with the conversion of dwellings into smaller units, wherever in the Plan area they are located. The Policy opposes conversions that would result in the loss of a dwelling of three or fewer bedrooms, other criteria controlling the impact of the conversion on the character of the area and the adequacy of its amenity and car parking provision.

5.5.129. Objections related to the arbitrariness of the three bedroom threshold, the use of "adequate" in two of the criteria and the impact of conversion on the character of a neighbourhood and on the countryside. There was a request for mention of the Council's Supplementary Planning Guidance "Large Houses in Large Gardens" which gives additional advice on residential conversions. The Council proposed an addition to Paragraph 5.35 which met this request (PC47). The main issues remaining were the appropriateness of the threshold and of the wording of criteria 3 and 4.

Consideration

5.5.130. The reasoned justification of the Policy recognised the importance of conversions for maintaining a supply of smaller dwellings and the first criterion could also be seen as a part of the policy of the Plan to maintain a mix of housing of different sizes, in this instance with emphasis on maintaining the smaller family sized units. However, it was an arbitrary threshold and the Council agreed that the first criterion should be deleted (PC46).

5.5.131. The three other criteria in part reflect the General Policies, criterion 4 in particular, but there is more justification to repeating those of most importance in relation to a specific form of development, such as conversions, than in relation to residential development where the General Policies would apply more widely. My concerns, therefore concentrated on the wording of the criteria. GOSE commented that "adequate" in criteria 3 and 4 did not provide a proper measure to judge if a development would be acceptable in these respects. These criteria are not enlarged upon in the reasoned justification, although "adequate" in terms of open space provision would presumably relate to the standards set out in Policies 99R2 and 99R3 and car parking in relation to the Council's car parking standards.

5.5.132. The Council appears at an earlier stage to have considered adding a sentence to Paragraph 5.35 that would have made this clear, but it did not figure among the Pre-Inquiry Changes. In my view it would be preferable to include that sentence or something like it and to refer to the standards concerned in the criteria.

5.5.133. The Policy, with the revisions, would appear to make the necessary provisions to allow the character of neighbourhoods to be protected if conversions took place. The St Catherine's Village Association suggested somewhat more detailed criteria, but they would not seem to be of any significantly greater effect. West Clandon Parish Council noted that the Policy did not distinguish between the conversion of larger houses in the urban areas and those in the Green Belt villages, suggesting that it would be appropriate for it to do so. PPG2 does not indicate that there should be a different policy approach to conversions in the Green Belt, as opposed to other locations. The Policy applies to all conversions, but if there were Green Belt implications, on its openness for example, it would enable them to be taken into account.

CHAPTER 5. RECOMMENDATION 7.

5.5.13. That PC46 be made.

5.5.14. That Criteria 3 and 4 of Policy 99H7 be worded:-

3. AMENITY AND SPACE STANDARDS ARE IN ACCORDANCE WITH COUNCIL'S ADOPTED STANDARDS.
4. PROVISION IS MADE FOR CAR PARKING ON SITE IN ACCORDANCE WITH THE COUNCIL'S PARKING STANDARDS.

5.5.15. That the following sentence be added to Paragraph 5.35:-

THE COUNCIL'S STANDARDS FOR THE PROVISION OF OPEN SPACE ARE GIVEN IN POLICIES 99R2 AND 99R3 OF THE PLAN; THE COUNCIL'S CAR PARKING STANDARDS ARE CONTAINED IN APPENDIX 1 TO THE PLAN.

5.5.16. That PC47 be made.

6. RESIDENTIAL EXTENSIONS

POLICY 99H8. EXTENSIONS TO DWELLINGS IN THE URBAN AREAS.

Objector

Objection 214

Surrey County Council (CW)

5.6.1. The Policy sets out specific criteria to be observed when dwellings in the urban areas are being extended. The only Objection sought clarification of the second criterion. The Council agreed that it was the amenity of adjoining buildings which was the consideration and proposed an appropriate change to Criterion 2 and Paragraph 5.36 (PC48).

5.6.2. Many, perhaps the majority, of extensions and alterations to dwelling houses are likely to fall within the permissions granted by the General Permitted Development Order. Only those extensions which by reason of their size or position fail to meet the requirements of the permissions of the Order would fall to be dealt with under this Policy. It is my view that for the benefit of the users of the Plan this should be said, as well as drawing attention to the Council's Supplementary Planning Guidance. I suggest a sentence to be added to the beginning of Paragraph 5.36.

5.6.3. In this Policy as in others considered earlier, I consider it to be necessary to qualify "adverse" where it appears in Criteria 2 and 3.

CHAPTER 5. RECOMMENDATION 8.

5.6.1. That PC48 be made.

5.6.2. That in Criterion 2 and Criterion 3 "SERIOUS" or "UNACCEPTABLE" be added before "ADVERSE EFFECT".

5.6.3. That the following be added to Paragraph 5.36:-

MANY SMALLER EXTENSIONS AND ALTERATIONS TO DWELLINGS ARE PERMITTED BY THE TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT) ORDER 1995 (AS AMENDED).

POLICY 99H9. EXTENSIONS TO DWELLINGS IN THE COUNTRYSIDE.

Objectors

<i>Objection 215</i>	<i>Surrey County Council (CW)</i>
<i>Objections 726-8</i>	<i>Shere Parish Council</i>
<i>Objection 924</i>	<i>Howard Hutton and Associates</i>
<i>Objection 1024</i>	<i>Robert Shaw and Partners</i>
<i>Objection 1531</i>	<i>Loseley Estate</i>
<i>Objections 1630-1</i>	<i>D and M Planning Partnership</i>
<i>Objection 1650</i>	<i>Country Landowners Association</i>
<i>Objection 1863</i>	<i>CPRE Surrey</i>
<i>Objection 1933</i>	<i>Mr J T Harrold</i>
<i>Objection 1937</i>	<i>East Horsley Parish Council</i>
<i>Objection 2033</i>	<i>Mrs L A Walsh</i>
<i>Objection 2061</i>	<i>GOSE</i>
<i>Objection C35</i>	<i>Horsley Countryside Preservation Society</i>

Background, Objections and Issues

5.6.4. The Policy, which applies to the parts of the Plan area over which the Green Belt and Countryside Beyond the Green Belt designations are drawn, including the identified settlements in the Green Belt, is drafted in similar terms to the preceding Policy, but with the addition of reference in Criterion 1 to the small dwellings policy mentioned earlier in Policy 99H6. The Policy, indeed, has much in common with that Policy, including a similar paragraph containing a presumption against disproportionate additions in the Green Belt outside the identified settlements.

5.6.5. The Objections took views that the Policy was variously too lax in what it would permit, insufficiently precise to be an effective guide, poorly worded, or too inflexible. Its contribution to the small dwellings policy was also criticised, although I indicated in relation to Policy 99H6 that I did not see such a policy as inappropriate to the Plan. The Objection of Surrey County Council, which was similar to their objection to the Policy above, was proposed to be met by PC48.

Consideration

5.6.6. As mentioned above, many of the smaller extensions proposed will be permitted by the General Permitted Development Order, although in the part of the Plan area designated an Area of Outstanding Natural Beauty (article 1(5) land) the extent of the permissions is restricted. These permissions would, nevertheless, often cover the small extensions required to provide bathrooms and kitchens when dwellings are being improved or modernised, a concern of one Objector. They also cover some of the forms of extension and alteration that Objectors considered to be undesirable. In general, the Policy would apply only to the more substantial extensions and alterations of dwelling houses that would fall outside these permissions. It would seem to add to the clarity of the Policy to mention the Order, and its limitations in the AONB. Paragraph 5.37 would offer an opportunity.

5.6.7. The close relationship of the Policy with the General Permitted Development Order justifies the use of similar definitions, and a "cumulative" limit, for extensions and the inclusion of buildings within the curtilages of dwellings. Beyond the sizes permitted by the Order I see no need to specify the percentage or other measure of the size of extension that would be permitted. That would be likely to be governed in most instances by the considerations mentioned in the criteria of the Policy. Such a Policy is best expressed positively, rather than negatively as CPRE suggested. The CPRE's other suggestion that extensions should only be permitted where related to local countryside employment or special need would be too restrictive in relation to the clear intention of Government that householders should be permitted to extend their dwellings within reasonable limits.

5.6.8. Again there was criticism that the "adverse effect" was unqualified, and again I recommend that some qualification be given. Refusal of an application on that ground would need to show that the effect was more than simply adverse. The wording of Criterion 4 was criticised as to what "existing context and character" meant, but as in other instances where this wording has been used, I considered it would in most circumstances be easily understood. The Council's proposed changes to the reasoned justification (PC49 and PC50) add to its clarity and should, I consider, be made.

CHAPTER 5. RECOMMENDATION 9.

5.6.4. That PC48 be made.

5.6.5. That in Criterion 2, Criterion 3 and Criterion 4 "SERIOUS" or "UNACCEPTABLE" be added before "ADVERSE EFFECT".

5.6.6. That to Paragraph 5.37 be added:-

MANY SMALLER EXTENSIONS AND ALTERATIONS TO DWELLINGHOUSES ARE PERMITTED BY THE TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT) ORDER, ALTHOUGH IN THE AREA OF OUTSTANDING NATURAL BEAUTY THESE ARE MORE LIMITED IN EXTENT THAN IN OTHER PARTS OF THE RURAL AREA.

5.6.7. That PC49 and PC50, be made.

7. MEETING HOUSING NEED

5.7.1. This section of the Chapter deals with specific housing needs and problems. In particular, the circumstances of the local housing market and the limitations on further development have created mismatches between the needs of local people and the available housing stock in such matters as dwelling sizes and costs. There are also policies relating to travellers and to the special circumstances of Home Farm, Effingham.

POLICY 99H10. HOUSING NEEDS.

Objectors

<i>Objection 238</i>	<i>GOSE</i>
<i>Objection 619</i>	<i>MOD</i>
<i>Objection 798</i>	<i>Guildford Society</i>
<i>Objection 925</i>	<i>Howard Hutton and Associates</i>
<i>Objection 1026</i>	<i>Robert Shaw and Partners</i>
<i>Objection 1139</i>	<i>Barratt Southern Counties</i>
<i>Objection 1205</i>	<i>HBF</i>
<i>Objection 1410</i>	<i>English Courtyard Association</i>
<i>Objection 1417</i>	<i>Merrist Wood College</i>
<i>Objection 1451</i>	<i>West Horsley Parish Council</i>
<i>Objection 1497</i>	<i>Beazer Strategic Land</i>
<i>Objection 1512</i>	<i>Mr S Fidgett</i>
<i>Objection 1773</i>	<i>Consortium of Registered Social Landlords</i>
<i>Objection 1864</i>	<i>CPRE Surrey</i>
<i>Objection 1935</i>	<i>East Horsley Parish Council</i>

Background, Objections and Issues

5.7.2. A number of Objections to this Policy, the main concerns of which were the development of part of the former Barralets Nursery, Pirbright, for retirement homes, are considered in connection with Policy 99RE3 in Chapter 10.

5.7.3. The Policy sought to guide new residential development towards the provision of a preponderance of dwellings of no more than three bedrooms, on the basis that the 1991 Census indicated a significant mismatch between the size of dwellings and the size of households, while the Council's Housing Needs Surveys (1994 and 1999) showed that the great majority of households requiring housing wanted dwellings in the 1-3 bedroom range. The Policy set down thresholds for the scale of development beyond which the Council would seek to negotiate an element of dwellings of these smaller sizes. The reasoned justification suggested that refusal of planning permission would be seen to be reasonable if, in the qualifying developments, more than 20% of the dwellings were of four or more bedrooms.

5.7.4. The Objections asked a number of questions about the Policy and the Paragraphs given in its justification and amplification. The issues arising from these were whether:-

- (a) a policy governing dwelling sizes was appropriately included in the Plan,
- (b) if so, was the form of the Policy reasonable, up to date and not over restrictive,
- (c) the thresholds were appropriate,
- (d) the Policy was dealing adequately with the needs of the elderly, the provision of affordable housing and other groups, such as students, and

- (e) was the Policy consistent with Policies seeking good and neighbourly development.

Consideration

5.7.5. The Objection of Robert Shaw and Partners quoted from the version of PPG3 that was current at the time the Plan was deposited. The advice then was clearly that a Plan should seek to regulate the mix of house types only when there were specific planning reasons for such control, and in doing so they should take account of marketing considerations. The later version of PPG3 (March 2000) said that local authorities should take account of assessments of local housing need in determining the type and size of additional housing for which they should plan, plans securing an appropriate mix of dwelling size, type and affordability and encouraging the provision of housing to meet the needs of specific groups, among them the elderly and students. Apart from there being a requirement for survey to establish the needs, for which advice is to be issued, there was no detailed guidance as to how such policies should be drawn up and implemented.

5.7.6. While ostensibly for negotiation, the Policy is imposing requirements on all of the larger development sites without reference to their location (other than through an urban/rural split) or their suitability for dwellings of particular sizes. In many instances the "market" may be perfectly willing to meet this requirement. One and two bedroom flats could be the builder's preferred development of a site in the inner areas of Guildford, for example. In others, such a development might not be appropriate from a market point of view, or the best planning of the area.

5.7.7. There is I consider a need for caution with a Policy which could make the provision of a mix of housing negotiable as a planning gain, with the implications that could have for showing it to be necessary to the development, on the one hand, and adding it to the sum of planing gains that various other Policies seek on the other. It is important to the functioning of the Plan that the required housing sites come forward for development and are not unduly discouraged by adding costs or weakening the marketing opportunities.

5.7.8. The Policy uses the same thresholds as the following Policy, which seeks the provision of affordable housing in much the same terms as this Policy seeks a mix of dwelling sizes. Not saying otherwise, it can be assumed that the principle of a mix of dwelling sizes would be applied to the affordable element of the housing provided on development as well as to the "market" part. There was Objection that this would distort the provision of affordable housing, for which the social landlords would have well known and specific requirements in any particular location. The advice is that affordable housing developments should contain a mix of dwelling sizes and types, but there is an argument for excluding the affordable housing element, on the ground that the provision should match the needs of the occupiers to be nominated by the provider. To exclude that element, however, could make the impact of the Policy on the market element all the greater.

5.7.9. The provision of affordable housing has detailed support in Government advice, most recently Circular 6/98, and the form of the policies suggested was directed to that particular end. Affordability is something that can be quite easily defined and agreed.

In the housing stock there is often a large degree of deliberate under-occupation, it can be a reflection of living standards, homeworking or simple aspirations, difficult to quantify accurately. In justification of the use of the affordable housing thresholds in this Policy reference is only made to the advice relating to affordable housing policy. I am not sure that this is sufficient to justify their use here and, noting the suggestion of Paragraph 5.46 that smaller dwellings may also be appropriate on smaller sites, it would appear preferable to have a Policy which could be applied to all sites and in a more flexible manner.

5.7.10. There was comment by Objectors that the Policy did not deal adequately with certain specific groups who might require dwellings of the smaller sizes. The needs of the elderly and of students, in so far as they are not satisfied from the existing housing stock, are often catered for by specialist developers, public and private. I do not see a need for their specific mention in the Policy, even if how they see that needs might be met could be enlarged upon in the reasoned justification.

5.7.11. The last of the issues I identified related to the interface between this Policy and those seeking development that was in character, neighbourly and appropriately located for those who would be its occupiers. This, I assume, would be achieved through the application of the General Policies, although the apparent inflexibility of the Policy raised some questions as to this. Reference would seem to be required in the reasoned justification, if not in the Policy itself.

Conclusions

5.7.12. It could be concluded from the comments I have made that, while I am sympathetic to a Policy directed to achieving a mix of dwelling sizes and types that will be better tailored to local needs than might be achieved by market forces alone, I do not think that the Policy proposed is suitable. One simple approach would be to omit this Policy and add a further criterion to Policy 99H4 and 99RE3:-

4. provides a mix of dwelling types and sizes appropriate to the location and reflecting the current housing needs of the area.

An addition to the reasoned justifications would be required pointing out the need for smaller dwellings, based on the Census and the Housing Needs Survey and that, where appropriate, the Council might seek to influence the mix by negotiation.

5.7.13. A different approach to the provision of smaller dwellings might be made using the advice of PPG3 relating to density. Its purpose is to ensure that the best use is made of land coming forward for development. The Plan does not contain a density Policy. The advantages of such a Policy could be that, as in the suggestion above, there would be an opportunity to obtain smaller dwellings on any site coming forward for development, not just the larger, while density could be a factor encouraging developers to look to providing smaller dwellings.

5.7.14. PPG3, paragraph 58, suggests that developments of less than 30 dwellings per hectare make inefficient use of land. It further suggests that development should be

encouraged at between 30 and 50 dwellings per hectare, greater intensity of development being sought at places with good public transport, such as town, district and local centres or around major nodes along good quality public transport corridors. A Policy could be framed on the basis of this advice, with the explanation of the PPG used as the basis of the reasoned justification.

5.7.15. Such a Policy would require a minimum density of 30 dwellings per hectare (as defined in the PPG) and would apply to sites coming forward for development anywhere in the Plan area. There could be a general caveat relating to the General Policies, or more specific mention of circumstances where it might, exceptionally, be appropriate to look for lower densities. Higher densities, normally up to 50 dwellings per acre, could be indicated in the urban areas, the level depending on the matters raised in the General Policies and the sustainability credential of the site, and, if it were desired, the inclusion of smaller sized dwellings. I have not suggested a draft for the Policy, although Policy 5.2.2. on page 72 of the Planning Officers Society's "Better Local Plans, A Guide to Writing Effective Policies"; could provide a suitable model.

CHAPTER 5. RECOMMENDATION 10.

5.7.1. That Policy 99H10 be omitted and in its place be substituted a Policy or Policies as suggested in paragraphs 5.7.12 and/or 5.7.15 above.

POLICY 99H11 AFFORDABLE HOUSING

Objectors

<i>Objection 41</i>	<i>Glen House Estates Ltd</i>
<i>Objection 69</i>	<i>Mr S Young</i>
<i>Objection 70</i>	<i>Ms S Young</i>
<i>Objection 209</i>	<i>Alfred McAlpine Homes Ltd & Trenfold Ltd</i>
<i>Objection 239</i>	<i>GOSE</i>
<i>Objection 276</i>	<i>Mr J Sawyer & Mr P H Munday</i>
<i>Objection 393</i>	<i>British Telecommunications Plc</i>
<i>Objections 926-7</i>	<i>Howard Hutton & Associates</i>
<i>Objection 1140</i>	<i>Barratt Southern Counties</i>
<i>Objection 1172</i>	<i>Action</i>
<i>Objection 1206</i>	<i>HBF</i>
<i>Objection 1225</i>	<i>McCarthy & Stone (Developments) Ltd</i>
<i>Objection 1240</i>	<i>Ash Parish Council</i>
<i>Objection 1259</i>	<i>Guildford Chamber of Commerce</i>
<i>Objection 1380</i>	<i>Guildford Business Forum</i>
<i>Objection 1406</i>	<i>Bewley Homes plc</i>
<i>Objection 1418</i>	<i>Merrist Wood College</i>
<i>Objection 1498</i>	<i>Beazer Strategic Land</i>
<i>Objection 1550</i>	<i>St Martha Parish Council</i>
<i>Objections 1759/63</i>	<i>Burt Boulton Holdings Ltd</i>

Objections 1774-7
Objection 1936
Objection C108

Consortium of Registered Social Landlords
East Horsley Parish Council
CPRE Surrey

Background, Objections and Issues

5.7.16. At one time most "affordable" housing was provided by public authorities who built and managed much of such housing and were in a position to control the numbers of such dwellings and their costs. In recent years that responsibility has been devolved on Housing Associations and other similar Registered Social Landlords in a situation where the majority of housing development is led by private builders. In recognition of the changed situation, Government policy has been that in preparing local plans policies should be incorporated that will enable local authorities to negotiate for an element of affordable housing to be provided when development takes place. The advice is quite detailed as to the circumstances in which such an element is appropriately negotiated and the amounts of housing that might be sought.

5.7.17. Paraphrased, PPG3 (paragraph 15) asked that local plan policies should

- define what is considered to be "affordable" in the Plan area,
- indicate how many affordable homes are needed in the Plan area, and
- identify suitable areas and sites and the amount of provision that will be sought.

More detail of the policy and how it should be interpreted is provided in Circular 6/98.

5.7.18. A basis for the Plan policy is laid in the Structure Plan, Policy DP3. The Structure Plan went further in suggesting that 25% of the housing provision for the County in the Structure Plan period should be in the form of affordable housing. The Council provided a Topic Paper, Affordable Housing (CD12), which set out this background, together with an explanation of the reasons for the Policy being framed as it is in the Plan. This included the sources of information that had gone into the definition of what "affordable housing" should mean for the Plan area, the assessment of the need and the justification of the thresholds incorporated into the Policy.

5.7.19. Policy 99H11 is concerned with the provision of affordable housing when the larger sites are developed throughout the Plan area. The following Policy 99H12 deals with a particular facet of the Government's affordable housing policy, the provision of affordable housing for local needs in rural areas. The Round Table discussion which took place during the Inquiry was concerned with both Policies. I have concentrated my consideration of the issues that arose in relation to affordable housing in general under this Policy, and have taken account of points of general application that were raised by Objectors who are listed under the Policy that follows.

5.7.20. The topics that formed the framework for the Round Table discussion summarised most of the matters that arose from the Objections and, with the addition of some more specific points, I have treated these as the main issues for my consideration.

Consideration

(a) The need for affordable housing.

5.7.21. An initial requirement is to define what is meant by affordable housing and to relate that to the local housing market. Paragraph 4 of Circular 6/98 gave a definition that encompassed both low-cost market and subsidised housing (irrespective of tenure) that will be available to people who cannot afford to rent or buy houses generally available on the open market. The Plan gave a definition which referred to housing which is affordable to local people who are in housing need and eligible for inclusion in the Council's Housing Needs Registers. This is at first sight a somewhat narrower definition, but a practical one which drew on the Council's Surveys of Housing Needs for house prices, household incomes and needs to relate the three.

5.7.22. As mentioned earlier, the Structure Plan gave a figure for affordable housing to be aimed for in the Structure Plan period. If 25% of new dwellings provided were affordable, some 950 should be provided. Up to the end of September 1998 about 600 had been built, leaving a residual requirement of 350 dwellings. The Council estimated that on the basis of this Policy a further 400 affordable dwellings could be provided in the Plan period. Against that, the 1999 Housing Needs Survey estimated that the need for affordable housing in the period 1999-2004 would be to accommodate 2871 households. Some part of that need would be met from the existing housing stock, but a net requirement of 1450 dwellings would remain.

5.7.23. McCarthy and Stone saw the arithmetic differently, and considered that only 264 dwellings were required to meet the Structure Plan's target, of which 145 would be provided on the three sites allocated by Policy 99H2. The balance to be found from other sites did not, in their view, require so demanding a Policy and significant contributions could be found by encouragement of the use of empty dwellings and a generally more efficient use of the housing stock, together with promotion of a higher density of development.

5.7.24. However the figures are looked at, the need remained considerable and even if the Structure Plan requirement was met by the operation of this and other Policies it seemed clear that a substantial real need for affordable housing would remain unsatisfied. However, the planning system was not intended by this means to provide more than a contribution to the need for affordable housing.

5.7.25. The need to ensure that affordable housing once provided remained part of the affordable stock was mentioned by several Objectors. As the Plan pointed out this is normally achieved by the involvement of a Registered Social Landlord, as advised by the Government guidance. Where there is no such involvement a planning obligation will be sought or planning conditions imposed, again in accordance with the advice.

(b) The site size thresholds.

5.7.26. The provision of affordable housing by a Policy such as this is a charge on development being undertaken for the general housing market and achieved through

negotiation as a planning benefit. The Government's advice has considered it appropriate for an affordable element to be sought in the larger developments, the Circulars advising minimum size thresholds for normal use. Circular 6/98 gave a minimum site size of 1ha or 25 or more dwellings, reducing in Inner London to 0.5ha or 15 or more dwellings. In settlements of 3000 people or less, it looks for the thresholds to be "appropriate".

5.7.27. The adopted plan, it was said, had been relatively successful in achieving affordable housing, on the allocated sites and on other sites of more than 0.4ha. The Plan proposes a site size thresholds of 0.5ha and introduces the further threshold of 15 or more dwellings. In the rural settlements with populations of less than 3000, 0.4ha and 10 or more dwellings are the suggested thresholds. The Circular would permit the thresholds proposed, if it could be shown that there was justification for applying to the Plan area the thresholds given for the particular housing situation of Inner London. While the Plan area can not in most respects be compared with Inner London, and more larger sites for development are likely to come forward, there was a similarity in the relatively large proportion of the population to whom market housing was not accessible. The Council argued, and I thought with good reason, that the justification for the site size thresholds proposed was provided by this situation, amplified by the small amount of development that would be likely to come forward on the larger sites. I gained the impression that other planning authorities of the Metropolitan Green Belt faced the same problem and were taking the same approach. The smaller settlements are essentially the Green Belt villages in which development is restricted to infilling and redevelopment and few sites are likely to meet even the lower size threshold.

(c) Dwelling number threshold.

5.7.28. In future, if the thresholds of the Policy are adopted, it is likely that the number of dwellings would become a more significant threshold than site size, as densities are raised and the focus of development falls on previously developed sites in built up areas. The policy to build smaller dwellings may also have some effect. If a minimum density of 30 dwellings per hectare is adopted, and most developments in urban areas are expected by PPG3 to be at higher densities, then sites smaller than 0.5ha would be likely to be brought within the range of the Policy. Circular 6/98 may in this respect be out of step with the latest version of PPG3 and the Council should consider whether a threshold of, say, 0.5ha/20 dwellings would be more appropriate.

(d) Proportion of affordable housing.

5.7.29. The proportion of the development, in terms of dwellings, to be affordable was suggested by the Structure Plan as 25%. Circular 6/98 considered that proportions should not in future be given in Structure Plans. The adopted local plan had no proportion in its policy, and it was commented that it had seemed to work satisfactorily, none the less. The Policy now included seeks 30% of dwellings on qualifying sites to be affordable, while accepting that the final number may be varied in negotiations, with regard to site suitability, the need for affordable housing and other material planning or marketing considerations.

5.7.30. Rather than a target figure, Circular 6/98 referred only to the care needed in determining the proportion of affordable housing in the overall numbers on the site. For the

reasons given in relation to the site size thresholds, I consider there is support for the proportion proposed, and sufficient flexibility to meet those circumstances where a smaller - or larger - proportion may be appropriate.

(e) Specialist residential developments.

5.7.31. Two particular sorts of development were raised in connection with this heading. The first related to developments by Registered Social Landlords. In so far as the development undertaken by these developers met the definition of affordable housing given in the Plan there would appear to be no problem. In other circumstances, the provision of affordable housing would, on qualifying sites, be negotiable and there would be sufficient flexibility to take account of the types and proportions of housing being provided to arrive at a reasonable solution. There would not seem to be grounds to specifically exempt such development from the Policy.

5.7.32. Much the same would be true of developments by a specialist provider of market retirement homes. McCarthy and Stone often develop relatively small urban sites, but seek to maximise their use, features that are very much in accord with the advice of PPG3. Their dwellings would fit the classification "small" and they tend to help the release of larger dwellings for family occupation. Account would need to be taken of the nature of these developments and the way they are operated, as well as their advantages in helping to achieve other objectives of the Plan. However, I would not see these as factors which would justify the exclusion of such developments from the Policy, only matters that should be taken into account in negotiations.

(f) Alternative sites and contributions in lieu of provision on site.

5.7.33. Paragraph 5.60 referred to the willingness of the Council to consider financial or other contributions towards the provision of affordable housing in lieu of provision on a particular site. The Government advice, and the intention of the Plan, is that where negotiated, affordable housing will be provided on the site in question. Only in exceptional circumstances will contributions in lieu or provision on another site be acceptable. Various concerns arose in relation to this aspect of the Policy, one that if the second site was above the threshold there should be an additional element of affordable housing negotiated, something the Council said it would view in the circumstances of the case. A further point was made that when an affordable element was negotiated on a site it was normally in relation to value of the land, the actual house building being undertaken at the expense of the affordable housing provider. The Paragraph was worded to cover construction costs.

(g) Other sources of affordable housing.

5.7.34. As mentioned earlier, this Policy is not intended to be the only source, and perhaps not the principal source, of affordable housing in the Plan period. Much of the supply will come from relets within the existing affordable housing stock. There will also be contributions from developments undertaken by Housing Associations, etc., the conversion of non-residential buildings, the reuse of vacant buildings, flats over shops being one

example, and from conversions. The Plan has policies relating to these other sources and to the further source covered by the following Policy, rural exception sites.

5.7.35. The Circular includes in the definition of affordable housing low-cost market housing. This is specifically excluded from the Plan definition, although not from the Policy, and a number of Objectors considered it should be included. I can accept that even the cheapest market housing in Guildford is likely to be too expensive for most if not all of those in the Borough who the Council define as in need of affordable housing. There is, nevertheless, a need to allow such housing to be taken into account, should it prove feasible, but in my view the reference to low-cost market housing and affordable equity share housing given in Paragraph 5.55 adequately covers this matter.

Conclusions

5.7.36. The Policy conforms closely with the advice of Government in Circular 6/98 and PPG3 and, while there are matters in the Policy that need to be kept under review, particularly in the light of the changed emphasis and priorities of PPG3, the changes I suggest are minor.

CHAPTER 5. RECOMMENDATION 11.

- 5.7.2. That consideration be given to changing the threshold from 15 or more dwellings to 20 or more dwellings.
- 5.7.3. That PC51 be made.
- 5.7.4. That in Paragraph 5.60(i) "PROVIDE" be substituted for "PAY FOR".
- 5.7.5. That PC52 be made.

POLICY 99H12 AFFORDABLE HOUSING FOR LOCAL NEEDS IN RURAL AREAS

Objectors

<i>Objection 186</i>	<i>Mr F Cirillo</i>
<i>Objection 241</i>	<i>GOSE</i>
<i>Objection 418</i>	<i>Mr P See</i>
<i>Objection 519</i>	<i>Guildford Diocesan Board of Finance</i>
<i>Objection 569</i>	<i>Major F B Suter</i>
<i>Objection 686</i>	<i>Ernst & Young</i>
<i>Objection 729</i>	<i>Shere Parish Council</i>
<i>Objection 737</i>	<i>Mrs S Y Jackson</i>
<i>Objection 744</i>	<i>Mr T Jackson</i>
<i>Objection 748</i>	<i>Ms A Smith</i>
<i>Objection 1133</i>	<i>Dingly Dell</i>

<i>Objection 1281</i>	<i>Ms S Parker</i>
<i>Objection 1308</i>	<i>Mr E C Baker</i>
<i>Objection 1444</i>	<i>West Horsley Parish Council (CW)</i>
<i>Objection 1473</i>	<i>Mr P Reilly</i>
<i>Objection 1511</i>	<i>Mr S Fidgett</i>
<i>Objection 1532</i>	<i>Loseley Estate</i>
<i>Objection 1551</i>	<i>St Martha Parish Council</i>
<i>Objection 1640</i>	<i>Mrs S Stevens (CW)</i>
<i>Objection 1651</i>	<i>Country Landowners Association</i>
<i>Objection 1743</i>	<i>Mr J A Burgess</i>
<i>Objection 1778</i>	<i>Consortium of Registered Social Landlords</i>
<i>Objection 1802</i>	<i>Ashdale Land and Property Co Ltd</i>
<i>Objection 1866</i>	<i>CPRE Surrey (CW)</i>

Background, Objections and Issues

5.7.37. A number of the Objections recorded to this Policy were concerned with the development of Barralets Nursery, Pirbright to provide retirement accommodation. They are considered in relation to Policy 99RE3.

5.7.38. Policy 99H11 considered above is concerned with the provision of affordable housing on the allocated and the larger non-allocated development sites as they come forward. That Policy applies throughout the Plan area, including the villages. In addition, Circular 6/98 and both the current and the preceding editions of PPG3 allowed for the development of land in rural areas to provide housing to meet local needs under the "rural exceptions policy". The policy enables permission to be granted for the development of small sites within and adjoining villages, which may be subject to policies of restraint, such as Green Belt, and which the local plan would not otherwise release for housing, to provide for affordable housing to meet local needs in perpetuity.

5.7.39. PPG3 goes on to say that the Policy is not intended to apply in most Green Belt areas, which are by their nature close to the main conurbations and where conditions are not typical of the generality of rural areas. This advice parallels that of PPG2, Green Belts, in which the areas of Green Belt where the policy might be applied are given as those away from the urban fringe, particularly in areas where there are many small settlements and it may not be practical or appropriate to define Green Belt boundaries around each one. The implication of the advice is that in these circumstances such development should be within the settlements. The Plan, however, goes a step further in suggesting that sites adjoining but outside settlement boundaries, or beyond settlement boundaries might also fall for consideration if there were no suitable site available meeting the first criterion.

5.7.40. Much of the Objection sprang from the apparent threat to the Green Belt posed by the Policy. Objectors considered it should not allow development outside settlement boundaries or should be limited in the number of dwellings that could be provided. There were also concerns that intentions to retain the dwellings as "affordable" in perpetuity were unlikely in the longer run to mean that and all that the Policy would achieve was a further extension of building into the open countryside. A number of Objectors, particularly those

concerned with Barralets Nursery, Pirbright, considered that "affordable" should in the local context include accommodation for the elderly who might not meet the Council's definition of being in need of affordable housing, but who wished to move from a larger dwelling to a smaller within the community and required the opportunity to do so.

5.7.41. The main issues to arise from the Objections were whether the Policy was a threat to the objectives of the Green Belt, or the protection of the countryside in absolute terms or having regard to the advice and whether it could be more accurately expressed.

Consideration

5.7.42. A "rural exceptions" policy similar to this Policy is included in the adopted local plan and, while now reworded, it follows the advice closely. It sets out the circumstances where sites may be released and the criteria against which proposals will be considered, as PPG3 requires, including the definition of what is meant by affordable housing (given in Policy 99H11) and defining the area in which needs will be considered "local".

5.7.43. Whether this Policy should apply to the whole of the rural parts of the Plan area is a moot point. In the areas of Green Belt and Countryside beyond the Green Belt to the north of the North Downs escarpment it is arguable that the settlements are so close to Guildford or the Blackwater Valley towns that such a Policy is unnecessary. Any requirement for affordable housing could be met more sustainably and without recourse to the development of greenfield land in the urban areas. To the south of the Downs, the Green Belt and AONB designations suggest that further development beyond settlement boundaries, even in these circumstances, should not be permitted for environmental reasons. Ms Parker's arguments against the Policy as permitting the unnecessary intrusion of development into the countryside are not without point.

5.7.44. It is my view that the Plan should be looking to meet the general requirement for affordable housing in the urban areas and in accordance with the sequential test of PPG 3. However, I accept that in some of the rural settlements there may be a need for modest amounts of affordable housing that cannot reasonably be provided in a nearby urban area and in which the opportunities for development within the settlement boundary are limited, by physical availability or cost. The "exceptions" policy affords the Plan a measure of flexibility in these circumstances. There was the suggestion that, as intimated in Paragraph 5.66, the Council's Housing Needs Surveys would enable positive proposals for affordable housing for local needs to be set out in the Plan. I accepted the Council's view that proposals to meet a local need under the terms of the Policy would require the backing of up-to-date surveys and assessments for the settlement in question.

5.7.45. The justification of the Policy and the mechanism by which it will be applied are well described in the Policy itself and the reasoned justification. There were, nevertheless, criticisms and suggestions in relation to the criteria of the Policy. Criterion 2 was criticised because the 0.4ha limit placed on the size of sites that might be developed under the Policy was not justified. The Council saw it as necessary as a protection of the countryside from undue intrusion. The scale of any development sanctioned under the Policy would presumably be guided by the assessed local need, but the need could exceed the 12 or

so dwellings that might be accommodated on a 0.4ha site and there would be a reasonable requirement to look to the extent of development the village might accommodate. One suggestion was to give the limit in terms of dwellings rather than site area, to avoid the subdivision of larger sites to pass the size criterion, but that seemed an unnecessary precaution. In this instance there could also be disadvantages unless the limit were kept low enough to ensure that substantial, out-of-character developments were not inadvertently permitted. Environmental considerations are the subject of a further criterion, but I saw no objection to suggesting a maximum size of site.

5.7.46. The objection to Criterion 4 was that environmental considerations should not take precedence over the need to provide affordable housing. That is not what the Criterion says. It refers to taking full account of environmental considerations and this seems to me to be an essential requirement for development that is inevitably going to be in a sensitive location vis a vis both the settlement and the surrounding countryside. Criterion 5 required that the services and infrastructure of the settlement were adequate to support the development, a basic consideration of sustainability. Also required was that additional public resources will not be required to improve services. This was subsequently refined as referring to local authority resources, not the services of the public utilities. This is not a consideration raised in relation to other housing development and, even if it could be considered a proper planning consideration, it does not seem appropriate here.

5.7.47. Criterion 6 was criticised because, having regard to the Policies of the Rural Environment Chapter, its provisions would mean that no development would be practical. The wording of the Criterion was also criticised for the inclusion of "adversely affect", rather than a more qualified phrase such as "materially detract from". There was a suggestion that the Criterion should recognise that rather than "will not conflict with the purposes of the Green Belt" there should be a recognition that the Policy was requiring a balancing of the objectives of the Green Belt and the need for affordable housing.

5.7.48. I could sympathise with the Objectors' views, although I did not share their pessimism. The Policy has to have regard to the objectives of the Green Belt, the AONB and the protection of rural amenity. A balancing of the different objectives where they come into conflict will be required in the operation of the Policy. As an "exceptions" policy there is an acceptance that housing development is in these instances being weighted more favourably than would normally be the case. That the development may well involve greenfield land is also a part of the exception. It was pointed out that its purpose was covered by Criterion 4 and that I agree would be sufficient and obviate the need for this further, somewhat difficult Criterion.

5.7.49. Additional criteria were proposed that would require that there was no alternative site in the village that was or could become available and that the scheme did not add to ribbon development. The Council responded that these would be matters which would be taken into consideration under the General Policies of the Plan as well as the other Criteria of this Policy. It could not be ruled out that proposals might not comply with these suggested criteria, but as "exceptions" such developments would need special justification.

5.7.50. Paragraph 5.64 expanded on the locational application of the Policy. Its deposited form preceded the publication of the March 2000 edition of PPG3. In so far as Green Belt villages were concerned this said "exceptionally a limited development of affordable housing within or adjoining existing villages or other small settlements may be acceptable and consistent with the functions of the Green Belt" (Annex B, para 5). The Council suggested rewording the first two sentences of Paragraph 5.64 to make them consistent with this advice.

5.7.51. Paragraph 5.64 also referred to the possibility that sites beyond settlement boundaries might be considered appropriate "exception sites". The Guildford Diocesan Board of Finance suggested that this should be included in the Policy itself:-

"In very special circumstances schemes may be permitted for low cost rural housing for local needs on sites which do not adjoin settlement boundaries and which meet the criteria set out in this policy".

5.7.52. The Objector is in my view right that this is an element of policy and one that is not referred to in the Policy itself. This may be looked at as an exceptional case to a case that is already exceptional, and its conformity to the advice is questionable, unless the site is to be considered to adjoin a small settlement not accorded a settlement boundary. If it is the Council's wish to allow for this sort of development, and I understand the reasons, it should be included in the Policy. The wording suggested on behalf of the Objectors would be suitable.

Conclusions

5.7.53. I consider that the Plan is pushing the advice to the very limits of what it will allow, but I appreciate, and accept, the Council's reasons for doing so. The Objectors misgivings are not without foundation. The Policy is, however, intended to meet a specific and precisely definable and quantifiable need in circumstances that are exceptional. The extent of development undertaken under the Policy is likely to be small and, while significant in the context of any particular rural settlement, the Policy itself and the General and Rural Environment Policies would have an effect on reducing adverse impacts.

5.7.54. I recommend the omission of Criterion 6 and the last phrase of Criterion 5, together with the inclusion of the element of the Policy relating to sites removed from settlement boundaries. The two Proposed Changes to the reasoned justification related to updating and a punctuation correction and these I consider should be made, along with the further change suggested by the Council.

CHAPTER 5. RECOMMENDATION 12.

5.7.6. That PC169 and PC170 be made.

5.7.7. That in Criterion 5 the following phrase be omitted:-

"AND ADDITIONAL PUBLIC RESOURCES WILL NOT BE REQUIRED TO IMPROVE SERVICES".

5.7.8 That Criterion 6 be omitted.

5.7.9. That in Paragraph 5.64 the following be substituted for the last two sentences:-

IN VIEW OF THE HIGH PRICE OF LAND AND VERY LIMITED OPPORTUNITIES FOR DEVELOPMENT IN THE BOROUGH'S SETTLEMENTS, EXCEPTIONALLY, THE COUNCIL MAY ALLOW LIMITED DEVELOPMENT FOR AFFORDABLE HOUSING WITHIN OR ADJOINING SETTLEMENT BOUNDARIES IN THE GREEN BELT

5.7.10. That the following be added to the Policy:-

IN VERY SPECIAL CIRCUMSTANCES SCHEMES MAY BE PERMITTED FOR LOW COST RURAL HOUSING FOR LOCAL NEEDS ON SITES WHICH DO NOT ADJOIN SETTLEMENT BOUNDARIES AND WHICH MEET THE CRITERIA SET OUT IN THIS POLICY.

POLICY 99H13 ACCESSIBLE HOUSING AND WHEELCHAIR HOUSING

Objectors

<i>Objection 630</i>	<i>Barratt Southern Counties (CW)</i>
<i>Objection 1207</i>	<i>HBF (CW)</i>
<i>Objection 1226</i>	<i>McCarthy & Stone (Developments) Ltd (CW)</i>
<i>Objection 1241</i>	<i>Ash Parish Council (CW)</i>
<i>Objection 1642</i>	<i>Mr S Stevens (CW)</i>
<i>Objection 1779, C255</i>	<i>Consortium of Registered Social Landlords</i>
<i>Objection 2062</i>	<i>GOSE (CW)</i>

Background, Objections and Issues

5.7.55. The Policy was intended to ensure that as far as possible new housing should be available to people with disabilities. The reasoned justification suggested that in larger developments a proportion should be designed to be accessible to those in wheelchairs. Policy 99G1(4) made general requirements for publicly accessible buildings to be available to those with disabilities.

5.7.56. The Objections referred variously to the 10% target, but also to the changes to the Building Regulations now in force that require accessibility for those with disabilities in new homes and made the Policy unnecessary. The Council accepted this and proposed in

PC53 that the Policy be deleted. Most of the Objections were conditionally withdrawn as a result.

Objections by the Consortium of Registered Social Landlords

5.7.57. The Consortium of Registered Social Landlords, however, were concerned that the Policy should be retained to secure the provision of housing suitable for people with a variety of disabilities and other special needs, not only wheelchair users, which should be listed.

5.7.58. The Policy was seeking to have a proportion of dwellings designed for the particular needs of those with physical disabilities, an objective now met by other legislation. The Consortium were looking for a rather different policy which would make housing available for people whose needs might be considered more social than physical. To my mind these are not housing needs that can be approached in the way that this Policy was framed, nor would a blanket policy of the sort that was suggested be appropriate. Some of the groups mentioned could be accommodated in normal housing developments, but others would need special accommodation, hostels, refuges and perhaps treatment centres which should be regarded as having individual locational requirements and to need to be considered on their merits.

Conclusion

5.7.59. I consider that the Policy should be deleted and no policy of the sort the Consortium suggest substituted.

CHAPTER 5. RECOMMENDATION 13.

5.7.11. That PC53 be made (deleting the Policy).

POLICY 99H14 GYPSY CARAVAN SITES

Objectors

<i>Objection 242</i>	<i>GOSE</i>
<i>Objection 454</i>	<i>Highways Agency</i>
<i>Objection 539</i>	<i>Waverley Borough Council</i>
<i>Objection 1242</i>	<i>Ash Parish Council</i>
<i>Objection 1614</i>	<i>Councillor Mrs J Cassar</i>

Background, Objections and Main Issues

5.7.60. The Criminal Justice and Public Order Act 1994 removed the duty of local authorities to provide gypsy sites and was expected to lead to applications from gypsies and others to establish such sites on their own account. Circular 1/94, in consequence, indicated that it was important that policies for gypsy site provision are set out clearly in development

plans, and that such policies may include the identification of sites and/or the inclusion of appropriate criteria-based policies. The Council has undertaken counts, as required, which suggest that the current provision for stationing caravans is sufficient for the numbers of gypsies currently visiting the Borough. No proposals are made for new sites, but a criteria based Policy is included, should further sites come forward as additions to, or replacements, of the present sites.

5.7.61. The Objections included views that the Policy was insufficiently positive, merely repeating parts of other Policies, that its terms suggested sites would only be permitted in the urban areas and that it should be merged with the following Policy relating to travelling showmen. It was suggested that there should be a commitment to safeguard the continuing use of existing sites for gypsies. The main issues that arose concerned the appropriateness of and the expression of the Policy to achieve its objectives.

Consideration

5.7.62. The requirements of gypsies and of travelling showmen are in many respects different, the latter, in particular, requiring winter quarters and the ability to park sometimes sizeable vehicles and trailers. In legislative terms, the former do not include the latter. While both may need to take into account the convenience of the site for short term residential use, I consider the Plan is correct to separate the Policies for the two activities.

5.7.63. The following Policy indicates that sites for travelling showmen will be located in the urban parts of the Plan area. This Policy makes no such requirement, although the wording of Criterion 1 could be seen to have that implication. Circular 1/94 (paragraph 3, repeated in PPG2, Annex E) pointed out that it was not appropriate to make provision for gypsy sites in areas of open land where development is severely restricted, giving as examples Areas of Outstanding Natural Beauty, Sites of Special Scientific Interest and other protected areas. They are not regarded as uses which are normally appropriate in Green Belts. This does certainly limit the area of search, unless the proposal could show very special circumstances that would allow for an exception.

5.7.64. However, there has been a tendency for gypsies as individuals or family groups to seek their own sites and the smaller scale of development this means can make it easier to show very special circumstances, or to avoid conflict with the environmental considerations at the heart of other rural protection policies. It would appear to me that to make the Policy more positive, removing the implication that only urban sites would qualify, "only" should be removed from the opening of the Policy, as the Council suggested (PC54). I have not considered that Criterion 1 should be removed, I see it as important to stress the constraints that apply to the rural parts of the Plan area, even if Criteria 5 and 6 would cover the essential protection of the character of the countryside.

5.7.65. Criterion 4 was also seen by one Objector to guide sites to the urban areas. As the sites will be in residential use, if on a temporary basis, I agree that it is important that they should offer a reasonable convenience to their occupiers. That did not carry with it the necessary concomitant that sites should be within or close to the urban areas. Many of the villages of the Plan area could provide the level of services required.

5.7.66. The Highways Agency was concerned that sites should not take access from the A3 or the M25. This is a concern that can be accepted, and the traffic implications of such developments in general would always be a factor to be taken into account. The Policy refers to the amenity aspects of traffic and to highway safety in respect of business uses on gypsy sites. Highway capacity and safety issues are covered by Policy 99G1(2) and I agree with the Council that a further Criterion here is not necessary.

5.7.67. Waverley Borough Council asked that the Policy protect existing gypsy sites, which should be shown on the Proposals Map. The Council considered that to do so would restrict its capacity to make provision for sites. I can appreciate that the demand for sites can fluctuate and that the Council would not wish to safeguard sites for which there was no longer a need. The provision of sites is, however, always likely to be controversial and once a suitable site is established, there is a case for ensuring that it remains available. The adopted local plan did include such a policy and it would appear to me appropriate to repeat that in the Plan.

CHAPTER 5. RECOMMENDATION 14.

5.7.12. That PC54 be made.

5.7.13. That the following be added to the Policy:-

THE EXISTING GYPSY CARAVAN SITES IN THE BOROUGH SHOWN ON THE PROPOSALS MAP WILL BE RETAINED FOR USE BY GYPSIES.

5.7.14. That the existing gypsy caravan sites be shown on the Proposals Map.

POLICY 99H15 SITES FOR TRAVELLING SHOWPEOPLE

Objectors

<i>Objection 34</i>	<i>Messrs Whittle, Maine, etc.</i>
<i>Objection 40</i>	<i>The Showman's Guild of Great Britain</i>
<i>Objection 122</i>	<i>Guildford Liberal Democrats</i>
<i>Objection 165</i>	<i>Mr and Mrs Povey</i>
<i>Objection 244</i>	<i>GOSE</i>
<i>Objection 455</i>	<i>Highways Agency</i>
<i>Objection 652</i>	<i>Tongham Parish Council</i>
<i>Objection 1243</i>	<i>Ash Parish Council</i>
<i>Objection 1615</i>	<i>Councillor Mrs J Cassar</i>

Background, Objections and Main Issues

5.7.68. Circular 22/91, mentioned in the reasoned justification to the Policy, asks that local authorities should consider the needs of travelling show people when preparing their

local plans. They should identify existing sites and make a realistic assessment of the accommodation required to provide the basis for relevant and appropriate plan policies. The Circular gives a general indication of the sorts of sites required and their location.

5.7.69. The Policy limits sites to the urban areas of Guildford and Ash/Tongham, subject to three criteria, two relating to the impact of the development on its surroundings and the third to convenience of the site to local services and facilities. The one existing site in the Plan area, at Chapel Lane, Pirbright, is mentioned in Paragraph 5.74. The site is not shown on the Proposals Map. The Council maintains contact with the Showman's Guild of Great Britain and in the Council's view no current need has been expressed for a further site to be identified. The Policy would be applied were further sites to be proposed.

5.7.70. The Showman's Guild made a number of points in Objection. Initially, it was pointed out that the existing site, and indeed many sites used by travelling showpeople, are in rural areas, even in the Green Belt. The Circular did not rule out such sites. The Policy should not restrict the search to the urban areas, the view also of the Guildford Liberal Democrats, Ash Parish Council and others, and should reflect the advice of the Circular more faithfully. The need for sites had, if anything, increased and it was not accepted that there was no current need for further sites in Guildford. The Guild and other Objectors referred to the existing site being small and full up. An appeal concerning the continued use of a site in Normandy, which had apparently been in unauthorised use, was dismissed in June 2000; displacing the occupiers and emphasising that there was an unmet need. There was the suggestion that in the absence of any site being proposed by the Council, the Normandy site should be allocated for the purpose.

5.7.71. GOSE was concerned that the Policy was repeating matters covered in other Policies while being insufficiently positive. The Highways Agency wished to avoid access being taken from the M25 or A3. Several Objectors thought that this and the preceding Policy could be combined. The main issues to emerge were whether the Policy was pursuing the correct objectives and was suitably worded for the purpose.

Consideration

5.7.72. Tongham Parish Council objected that it was unclear why the Policy referred to Tongham as an urban area. The division of the Plan area into areas where rural protection policies apply and those where they do not was remarked on in relation to earlier Policies in this Chapter. The areas described as "urban" are in this respect residual areas, the unifying characteristic of which is that they are built-up. This simple division between the larger continuously developed areas, such as Tongham with its neighbour Ash, and the countryside in which settlements appear as islands of development in open surroundings is of value in the framing of Policies. In so far as Tongham is concerned, which I, and no doubt the Council, accept has many of the features of the villages classified as rural settlements, the definition was for policy purposes related to the Plan and not necessarily to be seen as denying Tongham's village status.

5.7.73. In so far as travelling showpeople are concerned, the Circular asks local authorities to make realistic assessments of the amount of accommodation that might be

needed for travelling showpeople in their areas, including that made necessary by displacement. At the time the Plan was deposited the Council consider that there was no further identified need. Objectors, and the Normandy decision, have cast doubts on this being the present situation, at least in west Surrey and east Hampshire. However, apart from the Normandy site, which is considered later, there were no suggestions for specific sites to be allocated in the Plan, only a broad view from Objectors that more were required. A criteria based Policy by which sites coming forward can be assessed appeared to me to be the only practical approach in the circumstances.

5.7.74. The principal inconsistency between the Policy and the advice of the Circular was the ruling out of sites outside the urban areas. The Circular clearly envisaged that sites on the edges of urban areas should be taken into consideration, as well as sites more plainly rural. I can recognise that from a broad policy aspect such sites would not be appropriate development in the Green Belt. They might also be difficult to reconcile with the objectives of protection of the open character of the countryside in areas beyond. The Circular identified various site requirements, including environmental requirements as well as the actual suitability of such a site for the use and that these were not repeated in the Policy was seen as another inconsistency.

5.7.75. I did not see a need to repeat these more specific site matters in the Policy. Paragraph 5.75 says that the Council will have regard to the advice of the Circular in considering proposals. I did, however, accept that the Policy should allow for the consideration of proposals outside the urban areas. While it is not necessary for the storage, etc., activities to be combined with the residential element on the same site and that employment land within the urban areas could be used, the low intensity of the use is likely to put it at a disadvantage against other commercial uses. Employment land itself is scarce. There may be brownfield sites on the urban edges where such uses could be sited satisfactorily and with the policies for rural diversification and the reuse of rural buildings these could offer the most realistic opportunities for their accommodation.

Conclusions

5.7.76. It did not appear to be necessary to make a specific reference to access from the M25 or A3 being unacceptable, access and highway safety matters being included in the General Policies. I do, however, recommend the removal of the references to permanent sites only being permitted in the urban areas in the opening sentence of the Policy and deletion of the second paragraph. The addition of the first Criterion from Policy 99H14 would then be appropriate. The Council should consider whether the reasoned justification needs up-dating or amplification in view of the changes recommended. This could include reference to the Council's view that sites are most likely to be found in the urban areas where, if the residential use is separated from the storage, etc., uses sites in employment use may be found suitable. Sites in rural areas, including the reuse of rural buildings, would be considered in the context of the policies set down for these areas.

CHAPTER 5. RECOMMENDATION 15.

5.7.15. That Policy 99H15 be reworded as follows:-

PERMANENT SITES FOR TRAVELLING SHOWPEOPLE WILL BE PERMITTED PROVIDED:-

1. THE DEVELOPMENT WOULD NOT CONFLICT WITH POLICIES FOR THE GREEN BELT, THE COUNTRYSIDE BEYOND THE GREEN BELT AND OTHER POLICIES FOR THE PROTECTION OF DESIGNATED AREAS.

INCLUDE CRITERIA 1,2 AND 3 (NUMBERED 2,3 AND 4) AS IN THE DEPOSITED POLICY.

PLANNING CONDITIONS MAY BE IMPOSED LIMITING THE PROPORTION OF A SITE WHICH MAY BE COVERED BY EQUIPMENT OR THE HOURS DURING WHICH EQUIPMENT MAY BE TESTED.

- 5.7.16. That the reasoned justification be reconsidered in the light of the changes recommended above.

Land east of Grassypiece Copse, Aldershot Road, Normandy

Objectors

Objection 34 *Messrs Whittle, Maine, etc.*
Objection 40 *The Showmen's Guild of Great Britain*

5.7.77. The Objectors proposed that this site should be allocated in the Plan as a site for travelling showpeople. The site is land on the northern side of the Aldershot Road (A323) about 2.88ha in extent and at one time farmland, although in recent years occupied by the first group of Objectors for travelling showpeople's purposes, including residence, the principal occupation being during the winter months.

5.7.78. The use of the site has been the subject of various planning proceedings, the most recent an appeal against the Council's decision to refuse permission for the continuation of the use. The Secretary of States decision, issued by GOSE in June 2000, considered whether there were any very special circumstances which outweighed the harm caused to the Green Belt by reason of inappropriateness or other harm. Like the Inspector, he took account of four main issues, the effect on the openness of the area, that the application was for temporary permission, the general need for showpeople's sites and the appellants' personal circumstances and needs.

5.7.79. The Secretary of State supported the Inspector's conclusion that the matters put forward did not constitute very special circumstances that would justify inappropriate development in the Green Belt. The use of the site was a clear encroachment on the open countryside contributing to the unrestricted urban sprawl of Guildford and adding to the merging of Guildford and Aldershot, and agreed with the Inspector that the use had resulted

in significant harm to the visual amenity of the surrounding area. The harm outweighed even the benefits of allowing a temporary use while the occupiers found other sites.

5.7.80. On the issue of need, the Secretary of State accepted the difficulty of finding sites. He also noted that the appellants had been looking for other sites without success, and the advantages of the appeal site in terms of its convenience to the circuit of fairs they attended. At the same time, he saw that the suitability of sites was a matter for local plans and that the Plan was seeking to address the issue.

5.7.81. Since the Inquiry into the appeal the occupiers have undertaken works and further planting to add to the screening of the site. They have also expressed a willingness to undertake other works or to adjust the layout of the site if it would help to overcome the objections to the use. I accepted that the issues surrounding the use of the site could be different and should be reviewed for the purposes of the Plan. I also accepted that the Circular suggested that sites in use (although with planning permission) should be considered for allocation. Having seen the site myself, and recommended that the Policy leaves it open to consider sites outside the urban areas, to my mind insufficient has changed since the recent appeal decision was issued to disagree with the conclusions of the appeal Inspector and the Secretary of State, or make me see this as a site that would be appropriate for allocation in the Plan.

POLICY 99H16 HOME FARM, EFFINGHAM

Objectors

<i>Objection 227</i>	<i>Mrs V Chapman</i>
<i>Objections 246,2047</i>	<i>GOSE</i>
<i>Objection 1378</i>	<i>Effingham Residents and Ratepayers Association</i>

Background, Objections and Issues

5.7.82. The Policy relates to a substantial area between Effingham and East Horsley where a considerable amount of sporadic development has occurred, some of it in the form of dwellings of less permanent materials, such as timber, or mobile homes. The area is in the Green Belt, but in continuation of the policy of the adopted plan the Plan seeks to promote improvements to the environment and a restoration of the rural character of the area.

5.7.83. For the most part the Objections seek clarification of the Policy, by definition of the term "legally established use" included in the Policy and a facility for mobile homes to be replaced with permanent dwellings. GOSE raised two more fundamental matters, in the first place considering that being in the Green Belt the Policy was inappropriate and development should only be permitted under the terms of Policy 99RE2. In the second, the wording of the Policy was thought to be expressing an ambition more than a proposal. The main issue was what if any changes should be made in respect of these matters.

Consideration

5.7.84. I can appreciate that the Council would not wish to define "legally established use in the Plan. The matter is not necessarily clear cut and in many instances will depend on individual circumstances. A paraphrase could be attempted, but might mislead. The Council agreed that there should be an addition to the reasoned justification to say that the replacement of mobile homes would be considered in the light of Policy 99H5 (Retention of the housing stock) and other relevant Policies of the Plan (PC55). The Policy itself referred to Policy 99H6, replacement dwellings in the countryside, an element of which is the small dwellings policy.

5.7.85. Although it is not said in the Policy or its reasoned justification that Home Farm is in the Green Belt and that the objectives of the Green Belt will be pursued in its operation, Policy 99RE2, which applies to the Green Belt in general would be applicable. One of the forms of development considered appropriate, following PPG2, is the limited extension, alteration or replacement of existing dwellings. That Policy could, as GOSE suggest, be sufficient by itself, but I accept that the Plan is trying to improve the appearance and character of this area, not necessarily offering anything more in the way of development than Policy 99RE2 would permit. A Policy is probably more effective in this respect than a heading and a paragraph, such as Paragraph 5.76, alone.

5.7.86. I have to accept the GOSE criticism of the first sentence of the Policy. It was not clear quite what was meant by "continue to promote environmental improvements", whether these are actual works by or financed by the Council, for example, and what the improvements were. I was hesitant to suggest an alternative wording, but the Council should look again at this sentence to see if it could be given greater precision.

CHAPTER 5. RECOMMENDATION 16.

5.7.16. That PC55 be made.

5.7.17. That the first sentence of Policy 99H16 be reconsidered with a view to giving it greater precision.

CHAPTER 6. EMPLOYMENT

1. INTRODUCTION

6.1.1. The Introduction says that Guildford has a buoyant economy with low unemployment and a diverse economic base. The Section goes on to set out the provisions of the Surrey Structure Plan, which advocates a slowing of rates of development in view of the environmental constraints on the County, seeing most needs as being met from existing, or already allocated employment land.

6.1.2. The Guildford Action Plan for Business was prepared in consultation with local businesses to identify the key issues of the economy, as a result of which there have been a series of initiatives to assist businesses and foster the health of the local economy. They are, where appropriate, reflected in the Plan. The need for employment land in the Plan period is seen to be very low, given that no significant growth in the working population is envisaged. There is, however, recognition that there will be demands for businesses to expand and for changes to adapt to the variety of economic activities and the dynamics of business development. This is explained more fully in the Council's Topic Paper, Employment Land Availability (CD14).

Objectors to the Introduction

Objection 334

Councillor G Bridger

6.1.3. Councillor Bridger pointed out that while referring to local economy as "buoyant", the current problem was a desperate shortage of labour, a situation that was likely to continue throughout the Plan period. The Surrey Economic Audit had forecast a need for 12,000 more jobs in Guildford alone.

6.1.4. The reference to the Surrey Economic Audit 1996 in Paragraph 6.4 made reference to its finding that unemployment levels have reached the stage where labour shortages are likely to occur. Neither the Structure Plan, nor the Plan, was anticipating significant employment growth, which would bring with it further demands for housing and add to pressures on the local environments and to traffic congestion. What was being planned for was support for the vitality of the economy through maintaining flexibility. Little new land was being allocated for employment use.

6.1.5. The question of improving if not enlarging the local labour force, which would go some way to meeting labour shortages, is touched on in the next Section. The alternative route would be to discourage local business from development, by removing unused allocated land and making no new allocations in the Plan, but there was little to suggest that the balance aimed at of maintaining the economy without allowing significant new growth was seriously wrong.

6.1.6. The Society suggested the addition of a clause to Paragraph 6.7, "Employment predictions of the number of new jobs required through 2006 should complement the population predictions in Paragraph 2.17".

6.1.7. Paragraph 2.17 predicts only a very small increase in population in the Borough in the Plan period, even taking account of the new housing proposed. An actual estimate of the increase in employment through the Plan period is not given, although the implication of the proposals is that it would not be great. It would be tempting to seek a reconciliation of the two, but the Plan area is not an island in respect of either housing or employment and it would be mistaken to see any such balance as achievable or a reasonable target for employment policy. The proposals of the Plan do not anticipate significant expansion of the economy and in the broad sense the two figures can be seen to complement one another. I do not see that it would be helpful to draw attention to this in the Plan.

6.1.8. The second point made by the Society was that the employment predictions should state the number of new jobs to be created by University expansion. The Council considered that it was sufficient for the Plan to treat this aspect of employment growth under the University of Surrey Chapter of the Plan. In so far as the University's expansion proposals are spread over a longer time scale than the Plan and there is to be an attempt to achieve some balance between new University employment and housing development on the site this has some editorial justification. While the issues raised by expansion of the University may differ from those arising in connection with other employers in the Borough, as a part of the local economy and a contributor to the demand for labour, it does not seem wholly logical to exclude the University from the overall employment picture conveyed in this Chapter. I consider that a further Paragraph should be inserted (after Paragraph 6.7) that explains the impact of the University's proposals and how this may be mitigated.

CHAPTER 6. RECOMMENDATION 1.

6.1.1. That a further Paragraph be added to the Introduction to this Chapter:-

THE PLAN INCLUDES PROPOSALS WHICH WILL SEE THE NUMBER OF STUDENTS AND EMPLOYMENT AT THE UNIVERSITY OF SURREY EXPAND CONSIDERABLY OVER THE NEXT 20 YEARS. THE UNIVERSITY IS A MAJOR EMPLOYER IN THE BOROUGH, AT PRESENT HAVING ABOUT 2500 STAFF. THIS EXPANSION MAY HAVE ONLY LIMITED IMPACT IN THE PLAN PERIOD AND IN THE LONGER TERM. IN ACCORDANCE WITH THE PRINCIPLES BEING FOLLOWED TO CONTAIN FURTHER PRESSURES ON THE LOCAL LABOUR SUPPLY AND ON HOUSING, THE UNIVERSITY WILL BE PROVIDING SOME STAFF HOUSING ON SITE.

2. OBJECTIVES

6.2.1. The aim of the Plan to maintain the current supply of employment land is to be achieved by pursuing six objectives, listed in Paragraph 6.13. In general terms these envisage development involving only existing, or already allocated employment land, with more specific objectives directed to the rural economy and the support of small firms.

6.2.2. Objectors raised a number of differing points which I have considered individually.

Objection 335

Councillor G Bridger

6.2.3. It was considered that the term "employment land" should be defined, all land uses creating some form of employment. The Council pointed out that "employment" was defined in Paragraph 6.15, in terms of the Classes of the Use Classes Order concerned. This was the same definition used by the Structure Plan to define industrial and commercial development (paragraph 5.38). By extension, employment land for the purposes of the Plan is land in one or another of these uses. It is acknowledged that there are other employment uses not included in these Classes, particularly the Class A uses, shops, financial and professional services and food and drink, which are covered by specific topic chapters. I accept that there is a need to include all employment in the overall picture, but there did not appear to be a need to define employment land beyond the definition in Paragraph 6.15.

Objection 336

Councillor G Bridger

6.2.4. In this Objection the concern was that Paragraph 6.11 referred to any further increase in employment development leading to demands for housing and, in consequence, likely to put pressure on the Green Belt. The pressure for more housing already existed. Why, it was posed, with no significant unemployment, was the Plan seeking to protect employment land, when some of it might more usefully be developed for housing. In this light, the objectives for the Chapter appeared inconsistent with the situation. Changes to the Objectives were suggested, in Objective (i) substituting "appropriate industrial sites" for "existing allocated sites", omitting the second (protection of existing employment land and premises) and in (iii) supporting the redevelopment of existing employment land for housing, rather than employment uses.

6.2.5. There is an attraction to the Objector's suggestions, if there is reckoned to be a very close relationship between site area or floorspace and employment. That there is a relationship is undeniable, but the proposals of the Plan are directed to maintaining a flexibility, essentially for local businesses to change and grow. In this context, more efficient operation may require a greater floorspace, while leading to no increase, or even a reduction, in employment. The maintenance of the vitality of local business is an important aim and these objectives important to its achievement. I do not consider that they should be changed.

Objection 593

Prime Health (now Standard Life Healthcare)

6.2.6. The Objection referred to the labour/skill shortages the Company was experiencing, encouraging proposals for education and training.

6.2.7. Education and training would be an effective way to overcome shortages of particular skills in the local workforce and a valuable part of a broad employment policy. It is appropriate in the Plan only in so far as facilities might be required for this activity to be carried on. Chapter 15, Community Facilities, contains policies which are both protective and permissive and cover the point in so far as it is needed in the Plan.

Objection 528

Prudential Portfolio Managers

6.2.8. It was suggested that there should be encouragement for new investment and development in Guildford Town Centre. Applications should be considered on their individual merits in relation to any impact they might have on development pressures on the Green Belt.

6.2.9. The Plan contains allocations of land in the central parts of Guildford for development, for most of the sites proposing some employment uses. Other sites might be redeveloped under the provisions of Policy 99E2. Beyond that, there is a reasonable assumption that substantial development would add unacceptable pressures to provide further housing and exacerbate traffic congestion. While it might be practical to devise a ceiling and to allow development until that ceiling was reached, my view is that the developments envisaged by the Plan would themselves take up any leeway there might be. Any further development would be in immediate danger of adding to the pressures on the Green Belt, making such a policy approach not an appropriate one for the Plan.

3. SUPPORTING MEASURES

6.3.1. The Section contains the Policies which support the Objectives. In addition, in Paragraph 6.14, three of the Council's operational policies that are of consequence to businesses are mentioned. Paragraph 6.15 gives the definition of "employment" referred to earlier. This Paragraph gave rise to one Objection.

Objection 810

Mr P S Barralet

6.3.2. Mention was made above that the definition of employment, following the Structure Plan, did not include all activities that generated employment, being confined to Class B uses. The Objector considered that it should include retail nurseries and similar uses.

6.3.3. As was remarked above, the definition does not include Class A uses, while agricultural uses do not have a Use Class and in the countryside will normally be acceptable. In terms of total employment, these are activities that should reasonably be included, but their land requirements are different and the Plan, for practical reasons, distinguishes business and industrial uses from those that are retail or often look to locate in shopping centres. These

are dealt with in separate Chapters of the Plan, as are the policies relating to farm diversification or the reuse of rural buildings. Retail nurseries, and similar uses, from their often rural location and their relatively large sites in relation to their built area and employment are not usually on a par in these respects with the activities of the business and industrial uses of the B Classes. I agree with the Council that they are, therefore, not appropriately grouped with them for the purposes of this Chapter.

POLICY 99E1. ALLOCATION OF BUSINESS, INDUSTRIAL AND WAREHOUSING LAND.

6.3.4. Many of the Objections to the Policy related to the three allocated sites, or were suggesting additions. There were also Objections of a more general nature, considered first.

Objection 126 *Blackwater Valley Friends of the Earth*

6.3.5. The suggestion was that the opening of the Policy was too blunt in saying that planning permission will be granted and should be softened to "may be granted".

6.3.6. As it is the intention of the Plan that the development proposed should take place on these sites it is appropriate, and usual, for the Policy to say that planning permission will be granted for the development. It can be appreciated that there are no reservations voiced, or criteria added, that would qualify the circumstances or give the requirements that should be met. However, development would be subject not only to this, but to the General Policies of the Plan. I do not see a need to specifically say that.

Objection 535 *Prudential Portfolio Managers*

6.3.7. The Objectors asked for a cross reference to employment generating development being appropriate on identified sites shown on the Proposals Map, including approved and potential development sites. I was unsure whether this was to include sites with planning permission, or sites with existing employment use, for which in most instances identification on the Proposals Map would not be necessary. Sites allocated by this Policy and from the Chapter on Guildford Town Centre are shown. In text terms, there is a cross reference to the other sources of employment land included in the Plan in Policy 99E5.

Objection 1260 *Guildford Chamber of Commerce*
Objection 1381 *Guildford Business Forum*

6.3.8. These two Objections were that there was insufficient land allocated and what there was, was not of a quality to encourage development. A survey of local businesses by the Council had shown that about one third of respondents had expansion plans for the next few years. The amount of land allocated did not appear sufficient to meet these needs, while much of the allocated land was likely to be of use to only limited types and numbers of users. Land should also be identified to counter out-commuting from Guildford, of a quality to allow comparable jobs to be provided. A further concern was that there was insufficient support for small businesses.

6.3.9. The Council accepted the findings of the survey, but stressed that allocations of land for employment had necessarily to be balanced by the land that could be made available for housing. Not to do so would add to pressures to extend the urban areas, or exacerbate labour shortages. It appeared to me that the Plan had done the best it could to achieve a reasonable balance between the needs of the economy and the needs to restrain housing pressures from rising further. The Plan permits redevelopment of existing employment sites and this would seem the best opportunity for the provision of sites for businesses looking for particular qualities in a site.

6.3.10. I noted the view that not enough was being done for small businesses. The Plan mentions in Paragraph 6.14 initiatives for small businesses under other Council policies. The safeguarding of existing employment premises may also help small businesses. No specific policy initiative was suggested and I could put forward nothing that, in my view, would be helpful.

POLICY 99E1. ALLOCATED SITES

- (a) Thames Water Utilities, Slyfield Industrial Estate, Guildford
- (b) Slyfield Industrial Estate Extension, Guildford

Objectors

<i>Objection 139</i>	<i>Worplesdon Parish Council</i>
<i>Objection 384</i>	<i>Environment Agency</i>
<i>Objection 1395</i>	<i>Wildbrook Properties Ltd</i>

Background, Objections and Issues

6.3.11. The Slyfield Industrial Estate is a substantial modern industrial area on the north eastern edge of Guildford with the River Wey and the A3 to the east and, separated by a belt of open land, Jacobs Well to the north and north west. The adopted plan included proposals for the extension of the Estate in an easterly direction and the infilling of vacant land in Moorfield Road. Proposal (b) is the same as the proposals of the adopted plan, this land having not so far been developed. Proposal (a) is land to the south, adjoining the sewage treatment works, extending towards, but not up to, the River Wey.

6.3.12. The Estate is served from the A320, by means of a new roundabout leading into Moorfield Road. The Estate has no other vehicular access. Worplesdon Parish Council was concerned that extension of the Estate would add to traffic on the already congested A320, and that the environmental improvements and design standards promised have not materialised. The Environment Agency mentioned that the Thames Water Utilities land could be polluted. Wildbrook Properties pointed out that while the two sites together were indicated on the Proposals Map the individual parts were not. As mentioned earlier, some Objectors did not consider that these proposals were putting forward land for development that was of the required quality. The main issues to arise were whether these were appropriate allocations.

Consideration

6.3.13. The land concerned in the proposals is identified accurately on the Proposals Map. The practical difficulty is that, unless one has a good knowledge of the area, to identify sites (a) and (b) it is necessary to go back to the Proposals Map of the adopted plan and make a comparison. It would be preferable to letter the sites, as I have done, and on the Proposals Map to draw a boundary around the two sites and add the letters.

6.3.14. The Estate gives the impression of being a well favoured and popular site for industrial and service uses, the several car distributors and repairers who have moved there being notable. Those parts still to be developed could accommodate a variety of employment uses and while possibly not at present the prestigious location many office based uses might seek, the advantages the land has of extending to open countryside and to the River Wey offer opportunities for very substantial environmental improvement and the exploitation of considerable attractions. That there is the potential to provide quite sizeable sites as well as small is also in its favour.

6.3.15. There being only one access route is a draw back, although that access is good, other than at the peak times. To make an access directly to the site from the A3 would have obvious attractions, but I can appreciate that a further access would be likely to be opposed by the Highway Agency, while the access road would disrupt an open part of the Wey valley. An access from the north, from Clay Lane or Jacobs Well Road, would also cross open land but, more importantly, would be likely to have unwelcome traffic impacts on Jacobs Well.

6.3.16. The extension of the Estate is subject to a Development Brief, and the General Policies of the Plan would apply to further development on the Estate. It appeared that the principal cause of concern was the height of buildings and structures which could make the Estate more prominent. I saw no reason, however, with this general guidance in place, to consider that criteria or advice should be added to the Plan in these respects. The Council proposed adding a further brief paragraph in recognition of the possible contamination that may be present (PC56).

Conclusions

6.3.17. The allocation is to my mind an appropriate one, requiring only the two changes suggested above.

(c) Lysons Avenue, Ash Vale

Objectors

Objections 124,125
Objection 182
Objections 1088,1923
Objection 1244
Objection 1620

Blackwater Valley Friends of the Earth
Mr C R Lawson
Guildford Liberal Democrats
Ash Parish Council
Councillor Mrs Cassar

Background, Objections and Issues

6.3.18. The adopted plan identified two sites for proposed employment development in or adjoining the Lysons Avenue industrial area. These were Sites B and C, Site A being shown as part of the existing employment area. The sites have yet to be developed and the Plan has carried forward and identified all three. Sites A and B front onto Lysons Avenue. Site C, formerly known as the Lysons Avenue extension, is located off Station Road West between the industrial estate and the Avondale Housing Estate.

6.3.19. Objectors pointed out that it was not strictly correct for the Plan to state that three sites had been carried forward when only two were identified as proposals in the adopted plan. Site A did, however, have an employment allocation and it could be assumed that employment development would have been permitted. The reasons that employment land has been allocated in the Plan although unemployment rates are low have been considered earlier.

6.3.20. The main concern of the Friends of the Earth was that the three sites are currently vacant and, being overgrown, were of value to the biodiversity of the area. They were to be seen as greenfield, where brownfield sites should be the first choice in selecting development land.

6.3.21. These and other Objectors saw a major drawback to the use of Site C for employment uses being the close proximity of residential properties. It was considered that it was better suited to residential use.

6.3.22. The main issues to arise from the Objections were in my view whether any of the sites should be allocated for development, and if so, whether in the case of Site C residential should be the preferred use.

Consideration

6.3.23. The sites are owned by the Council and have been reserved for employment use for more than a decade. Much of the area around them has been developed for these purposes. The area has particularly good accessibility from the A331 and from Ash Vale and North Camp railway stations. Sites A and B, while still undeveloped, have planning permission for development and building appeared to have started on Site B. The wildlife value these small sites have had in the intervening period would be lost, but largely compensated for by the extensive areas of protected open land in the Blackwater Valley immediately to the west.

6.3.24. Site C is a somewhat larger, irregularly shaped site that at one time contained a house, "Woodside". Apart from the former house site, the site is overgrown with dense scrub and small trees, although there are hedges of conifers on its boundaries. To the north west the site immediately adjoins factories, to the west the railway and to the south east the residential estate, although an access road and garage blocks follow much of the boundary. While it would certainly have a nature conservation value, the disturbance to which it is

subject must detract from this and the open land of the Blackwater Valley is on the opposite side of the railway.

6.3.25. It was impressed on me that one of the problems faced by residents in Avondale is noise from the factories adjoining the north western boundary of the site. One of their reasons for not wanting industrial development of Site C was that it could bring similar noise sources much closer to the Estate. Having heard the noise that appears to be a constant daytime disturbance, I could appreciate the concerns. The noise may not be other than something that would pass with a change of equipment, process or occupier, but it would seriously detract from residential development if in even closer proximity. PPG24 is concerned that sensitive uses, housing in particular, should not be located where they could suffer from existing sources of noise.

6.3.26. The Council voiced the advantages of development on the site, which could provide a buffer to the noise from the existing factories, which it seemed could not be effectively controlled. The noise would itself militate against a residential use of the site, but I could accept that a development for employment purposes could provide mitigation and a visual transition. I consider, therefore, that the allocation for employment use is appropriate, sustainable and offering an opportunity to provide employment land in this part of the Plan area without amenity disbenefits to local people.

CHAPTER 6. RECOMMENDATION 2.

6.3.1. That the allocated sites of Thames Water Utilities and Slyfield Industrial Estate Extension be distinguished on the Proposals Map.

6.3.2. That PC56 be made.

POLICY 99E1: OBJECTOR'S PROPOSED ADDITIONAL SITE

Land at Dennis Way, Guildford

Objector

Objection 1395

Wildbrook Properties Ltd

Site, Objection and Issues

6.3.27. The site is a roughly triangular shaped area of what appeared to be unused farmland to the north of the commercial development in Dennis Way, part of the Slyfield Industrial Estate. The site is approachable from Dennis Way, or from North Moors, both roads serving the Estate. The Objection proposed that the land be added to the employment allocations of Policy 99E1, to allow the expansion of Dennis Specialist Vehicles, whose premises adjoin, for nursery industrial units and for a community centre, housing such facilities as a creche, to serve the Estate.

6.3.28. The land is at present in the Green Belt and forms a part of the open area separating the Estate, the northern edge of Guildford at this point, and the nearby settlement of Jacobs Well. The main issues appeared to me to be whether the need for employment land justified a change to the Green Belt boundary and whether development of this land would be damaging to the separate identity of Jacobs Well.

Consideration

6.3.29. PPG2 advises that when revising local plans existing Green Belt boundaries should not be changed unless alterations to the Structure Plan have been approved, or other exceptional circumstances exist which necessitate a change. The Structure Plan anticipates no change to the Green Belt at this point and I have not disagreed with the Council's view that the Plan is making an adequate provision of employment land for the Plan period. For Guildford, land already allocated on the Slyfield Industrial Estate remains available and a further area of land has been added. While there may be pollution, or other development problems with some of this land, it is land that has not been included in the Green Belt and it is previously developed land, the first preference for further extension of the Estate.

6.3.30. The site is part of a belt of open land which separates the Industrial Estate from Jacobs Well. The land was no doubt at one time farmed, although now it gives the impression of being neglected. Nevertheless, a pattern of hedges remains in which there are many larger trees and the land is an effective separation between the Estate and the nearby residential area. This gap is at its narrowest at the Dennis plant and the size of its buildings and other structures do affect the impression of separation at that point. To the north, where the site occupies some half of the width of the gap, while much might be done with good design and generous landscaping, if added to the encroachment already made by the development of Dennis Way, further development would result in a serious danger that the detachment of Jacobs Well from Guildford would be lost. This would be damaging to the character of Guildford and Jacobs Well and to the objectives of the Green Belt as a whole.

Conclusions

6.3.31. I was not aware of proposals to extend the Dennis plant, which might have required a consideration of whether there were very special circumstances in the case, while there appeared to be adequate allocations of land to supply starter units or a community centre for the Estate. In view of its Green Belt status and its local "gap" function, I could see no justification for recommending that this site be added to the allocations.

POLICY 99E2. REDEVELOPMENT OF EXISTING BUSINESS, INDUSTRIAL AND WAREHOUSING LAND

Objectors

Objection 546

Objection 975

Objections 1397/8

Objection 1471

Wey Estates

Enfranchise 302 Ltd

Bewley Homes Plc

BTR Siebe

Objection 1635
Objections C34, C36
Objection C113

D & M Planning Partnership
Horsley Countryside Preservation Society
CPRE Surrey

Background, Objections and Issues

6.3.32. This Policy was directed to the second leg of the employment land policy of the Plan, maintaining the present stock of land in employment use. The Policy used the term "suitably located", which was seen to be uncertain as to its meaning and there were suggestions that the land to which the Policy applied should be shown on the Proposals Map. One interpretation of "suitably located" was that it should mean only land in the urban areas. Land outside settlements or in the rural settlements should be excluded.

6.3.33. In PC57 and PC61 the Council proposed a number of changes to the Policy which would express its intention more directly, at the same time signifying that it applied only within the urban areas and the identified settlement in the Green Belt. That the land should be "suitably located" was retained, a further paragraph being added to the Policy to explain its meaning. A new paragraph was proposed to the reasoned justification to refer the development of employment land in the designated area of Countryside Beyond the Green Belt to Policy 99RE4 and for developments in the Green Belt outside the identified settlements to Policy RE3. This addition was in response to the proposed deletion of Policy 99E6, Employment in the Countryside.

6.3.34. The Proposed Changes led to some further Objections that the Policy was still allowing too free a rein for development in the identified settlements and in the Green Belt generally. I considered that while limiting its scope, the proposed changes would make the Policy more easily understood and more effective in its purpose. The main issues remaining were whether it was still adequately framed to achieve its objective of providing for the reuse of employment land without posing a serious threat to the Green Belt or other open land designations of the Plan area. The suggestion by Bewley Homes Plc that employment land on the Queen Elizabeth Barracks/Chart Depot site should be kept is in part met by the planning brief, which refers to an employment element being provided. Further extension would be at the expense of the housing yield, a more pressing need of the area.

Consideration

6.3.35. One of the concerns of Objectors, and of the Council, was that there are in the Plan area a number of important employment sites that are located in the Green Belt or the countryside. The Policy in its original form allowed some latitude for the redevelopment and even expansion of these sites. The Proposed Changes removed these sites from the scope of the Policy, but the addition to the reasoned justification implied that this development, from the importance to the local economy of the businesses concerned, could still be accommodated within the open land policies, Policy 99RE3 and 99RE4. The need for such development could be seen by the Council as potentially a "very special circumstance".

6.3.36. There was an understandable concern that in giving this indication the door to further development was being opened too wide by this implied presumption and it would be

better to exclude this new paragraph, requiring any such development to demonstrate in each instance the "very special circumstances" normally expected for development that is "inappropriate" in the Green Belt in the terms of PPG2. In my view this is the way that such development should be looked at. The needs of the business, or the local economy may or may not be a very special circumstance. However, I did not feel that read with the two Rural Environment Chapter Policies mentioned the new paragraph was undermining the Green Belt policies.

6.3.37. The inclusion of the "identified settlements in the Green Belt" within the scope of the Policy was also controversial. As "washed over" settlements PPG2 permits only very limited development, but it does not exclude the reuse of employment land and buildings. I accepted that in these settlements there is significant employment which makes an important contribution to the local economy and to their vitality. My view of the Policy was that in these settlements its aims were modest, directed to retaining employment opportunities rather than expansion, and I did not see that the Policy was wrong to include these settlements.

6.3.38. The Objection of BTR Siebe (Objection 1471) related to the BTR Vokes premises at Henley Park, a largely isolated site in the Green Belt. It was suggested that this site should be seen as a Major Developed Site in accordance with current Green Belt policy. The Council proposed that this and some other sites should be so identified. The Objector also suggested changes to this Policy, the purpose of which was largely fulfilled by the Proposed Changes, although the Policy itself would not in its new form apply to the Company's site.

6.3.39. The suggestion that the sites to which the Policy would apply should be identified on the Proposals Map appeared to me to be unnecessary. The Policy refers to existing business, industrial and warehousing land and indicates what will be permitted, should proposals come forward in respect of such sites. The number of sites that would come within the definition would be legion, many quite small and the task of mapping them considerable. The Policy also requires judgements to be made as to the suitability of the location, something that in many cases could only be done when considering a particular site or development proposal. Further, proposals in the Plan period are likely to affect only a very small proportion of these sites. Nothing of much significance would be added to the clarity of the Policy, or the understanding of it to those using the Plan if the sites were shown on the Proposals Map.

Conclusions

6.3.40. I consider that the changes to the Policy and to the reasoned justification make it very much clearer and more precise in its intentions. The inclusion of the identified settlements in the Green Belt is justified by the value of employment opportunities they provide to the local community and to the objectives of sustainability. This Policy and others in the Plan afford the necessary protection to the objectives of the Green Belt. I recommend no other changes than those proposed by the Council.

CHAPTER 6. RECOMMENDATION 3.

- 6.3.3. That PC57 and PC61 (addition of a new Paragraph(s) after Paragraph 6.24) be made.

Astolat Site, Old Portsmouth Road, Peasmarsh

Objector

Objection 974

Enfranchise 302 Ltd

Background, Objection and Issues

6.3.41. The site forms the northern part of the Peasmarsh Industrial Estate, to the south of the small settlement and situated between the Old Portsmouth Road and the River Wey Navigation. In the adopted plan the Industrial Estate is shown on the Proposals Map to be subject to Policy 8E, a policy identifying existing industrial estates and applying to them a policy not unlike Policy 99E2.

6.3.42. In the Plan the sites to which Policy 99E2 apply are not defined on the Proposals Map. The Objector asked that the site retain a designation, being a site to which Policy 99E2 would apply and having a need for rationalisation and redevelopment. Classes B1, B2 and B8 were mentioned as possible uses, together with retail purposes, car showrooms and car related workshops. The main issue was whether this site should be designated, under Policy 99E2 or for specific development.

Consideration

6.3.43. While similar, Policy 99E2 is not a direct successor to Policy 8E of the adopted plan, in its deposited form potentially covering all existing business, industrial and warehousing land. As explained above, this combination of large and small sites, and the "as and when development takes place" nature of the Policy makes definition of each and every site to which it might apply difficult, but in any case unnecessary.

6.3.44. Not being in an urban area or an identified settlement, the Proposed Changes to the Policy would remove the Peasmarsh Industrial Estate from its ambit. The Objectors, might, however, draw comfort from the further Proposed Change that designated the Estate a Major Developed Site in the Green Belt, a designation which would be defined on the Proposals Map. Within Major Developed Sites limited infilling and redevelopment is to be permitted, as suggested by PPG2, Annex C. Uses of Classes B1 to 8 would be acceptable, but the Council voiced objection to the possibility of retail use, which in this location would be contrary to the shopping policies of the Plan. Car showrooms can be accommodated in employment areas, but individual proposals would need to be considered on their merits.

Conclusions

6.3.45. The Estate will be defined on the Proposals Map and, if not in pursuit of the Policy the Objectors had in mind, it would appear to achieve most of their purpose. Other Policies of the Plan would have an influence on the uses that would be permitted if redevelopment took place and these would favour business, industrial and warehousing use and generally discourage retailing.

POLICY 99E3. SAFEGUARDING EXISTING AND ALLOCATED BUSINESS, INDUSTRIAL AND WAREHOUSING LAND

Objectors

<i>Objection 219</i>	<i>Surrey County Council (CW)</i>
<i>Objection 247</i>	<i>GOSE (CW)</i>
<i>Objection 394</i>	<i>British Telecommunications</i>
<i>Objection 536</i>	<i>St Catherines Village Association</i>
<i>Objection 547</i>	<i>Wey Estates</i>
<i>Objection 1141</i>	<i>Barratt Southern Counties</i>
<i>Objection 1381</i>	<i>Guildford Business Forum</i>
<i>Objection 1634</i>	<i>D & M Planning Partnership</i>
<i>Objection 1780</i>	<i>Consortium of Registered Social Landlords</i>
<i>Objections 1867-8, C11/5</i>	<i>CPRE Surrey</i>
<i>Objections C9, C11</i>	<i>Glen House Estates Ltd</i>

Background, Objections and Issues

6.3.46. Whereas the previous Policy permitted development for business, industrial and warehousing purposes on land already in those uses within the urban areas and the identified settlements in the Green Belt, this Policy resists the loss of such land to non-employment uses anywhere in the Plan area, other than where it can be shown to be no longer needed or unsuitably located for continuation in employment uses.

6.3.47. The Objections to the Policy in its deposited form were that it should be made more restrictive, less vague, including the definition of the sites to which it would apply on the Proposals Map, and more flexible in permitting changes of use to other employment generating uses in appropriate circumstances, or to residential use. One Objector thought that with the emphasis now on using brownfield land for housing, residential should be the preferred alternative use.

6.3.48. In consideration of the Objections to this Policy and the succeeding Policy 99E4 the Council put forward Proposed Changes which combined the Policies and reinforced their intention by more closely defining what was meant by "unsuitably located". They also added a further requirement that if land is to go to non-employment use there should be suitably located land or premises available for any displaced firms. An addition to the reasoned justification enlarged upon what was meant by the first clause of the Policy "the retention of the site has been explored fully without success".

6.3.49. In my view the Proposed Changes went a long way to meeting the substance of a number of the Objections, some Objections being conditionally withdrawn. The issues outstanding related to whether the Policy would still lack an appropriate measure of flexibility and whether the commercial test to be applied was an appropriate one.

Consideration

6.3.50. As in the case of the previous Policy, the identification of the land to which the Policy would apply would be a major task and, in view of the nature of the criteria by which land might be allowed to go to non-employment uses, it would not be practicable to isolate and map those sites in any comprehensive way. The Policy requires that if land is to go out of the employment uses defined in the Policy each case will need to be looked at in the light of the criteria on its individual merits.

6.3.51. The Policy in referring to business, industrial and warehousing land is using the narrow definition of employment used for the purposes of this Chapter given in Paragraph 6.15. "Non-employment uses" could include some uses that in more general parlance are employment generating, not least the Class A uses. I was, nevertheless, satisfied that read properly this aspect of the Policy need not appear confusing. I do, however, suggest that "other" be removed before "non-employment uses" in the opening phrase of the Policy.

6.3.52. The suggestion that changes of use should be permitted to those "non-employment" uses that are predominant in an area could have attractions when these were seen to be maintaining employment. The town and district centres come to mind. Nevertheless, appreciating that the Policy is directed to retaining the diverse range of employment and businesses that now exist, I can see that in most instances there would be reason to restrict the options that could lead to the loss of suitable premises. There would be the opportunity to consider alternatives in the light of this and other Policies of the Plan, if that is what the circumstances required.

6.3.53. The same would be true of residential use, affordable or market housing. While the thrust of policy is that new housing should as far as possible be on brownfield sites, so should other development. Although the Government is looking for 60% of new housing to be provided on brownfield sites, a balancing of needs is required. I would not see residential development as a priority over retention of a suitably located and viable employment use. Whether it should be a priority where land was not suitable, or no longer required for employment use is a different question, but the answer is likely to lie in the position and circumstances of the site and not to be something that can be determined generally in advance. In many instances the sorts of factors being taken into account mean that the alternative use that will be most favoured is likely to be residential.

6.3.54. The Council considered that the only way of determining if land was no longer required for employment use was to test the market with a realistic price over a sufficient period to determine if that was indeed the case. It was objected that such methods are open to distortion and abuse, although I accepted that as proposed to be expressed in the Plan this was made less likely. The necessity for a twelve month delay while the marketing exercise is carried out was also criticised as excessive on the one hand and insufficiently long to

provide a proper judgement on the other. The judgement of the method and its application, as well as the result, would lie with the Council and as a tool for the administration of the Policy I could suggest no better.

6.3.55. The Counter Objections raised a number of other points about the revised Policy and the additions to Paragraph 6.25. The second criterion was expanded to take in the wider environmental and sustainability matters as well as the impacts on the amenity of the area and adjoining occupiers. This was seen as less demanding than the original wording, which referred to traffic impact, highway safety, noise and other effects causing detriment to the amenity of neighbours and the area. I saw the addition of the further matters as useful, the revised clause still containing the original factors, if differently expressed. As a checklist of what could make a site unsuitably located it was I thought adequate.

6.3.56. Glen House Estates pointed out that the Proposed Changes introduced an ambiguity as to the appropriate considerations when employment land was to be permitted to pass to non-employment use. The Policy permitted this change in two circumstances which were clearly alternatives. The first was that the site was no longer needed and the second that it was unsuitably located. The changes proposed adding to the Policy a test that there should be suitably located land which could take any displaced firm. It was not clear whether this applied to both circumstances or only the second.

6.3.57. One purpose of the proposed changes to this Policy was to incorporate into it the following Policy 99E4, which dealt with inappropriately located premises. The addition to Policy 99E3 was an import from that Policy and clearly related only to the second circumstance. The Council's proposed changes to Paragraph 6.25 would make that clear.

6.3.58. That there should be such a requirement was in itself seen to be objectionable, if a site were unsuitably located. There would be a planning gain if an inappropriately located use were displaced. The Policy appeared to be balancing the benefit of preserving employment against the disbenefits of an employment use in a particular location and this could be seen as a discouragement to more appropriate development. However, the requirement was to show that there was suitably located land available, not to relocate the offending use, an exercise that would not in most instances be too difficult while there is allocated land undeveloped.

6.3.59. There was also the question whether in the second circumstance one of the factors mentioned would be by itself sufficient to make a site unsuitably located. In some instances, I have no doubt, this could be the case, while in others a combination of adverse factors, or a balancing of those in favour and against "suitability" would indicate the decision. I saw no need to explain this in the Plan.

Conclusions

6.3.60. This is a difficult Policy to administer because of the variety of factors that could lead to pressures for land to go out of employment use. The Objectors identified many of the difficulties, but I considered that the objectives of the Policy were appropriate and with the changes the Council proposed it was a reasonable and workable Policy. I have suggested

only one minor additional change, the further useful revision to Paragraph 6.25 having come from the Council.

CHAPTER 6. RECOMMENDATION 4.

6.3.4. That "OTHER" be deleted from the opening phrase of the Policy.

6.3.5. That PC58 and PC60 be made, except that

(a) In the second clause of the Policy "THE SITE IS" be deleted and "THE LAND OR PREMISES ARE" substituted.

(b) Paragraph 6.25 be worded as follows:-

IN ORDER TO MAINTAIN A DIVERSE RANGE OF BUSINESS, INDUSTRIAL AND WAREHOUSING PREMISES TO MEET THE NEEDS OF LOCAL FIRMS, THE BOROUGH COUNCIL WILL RESIST THE LOSS OF UNSUITABLY LOCATED PREMISES UNLESS IT CAN BE FULLY PROVED BY A COMPREHENSIVE MARKETING STRATEGY THAT THE LAND OR PREMISES ARE NO LONGER REQUIRED FOR EMPLOYMENT USE AS DEFINED IN THIS CHAPTER, AT A PRICE IN LINE WITH EXISTING EMPLOYMENT USES ON THE MARKET. EACH CASE WILL BE CONSIDERED ON ITS MERITS BUT THE BOROUGH COUNCIL WILL EXPECT THE MARKETING STRATEGY TO HAVE NORMALLY TAKEN PLACE FOR A CONTINUAL PERIOD OF TWELVE MONTHS PRIOR TO THE SUBMISSION OF ANY APPLICATION TO CHANGE FROM EMPLOYMENT USE.

POLICY 99E4. INAPPROPRIATELY LOCATED PREMISES

Objectors

<i>Objection 43</i>	<i>Glen House Estates (CW)</i>
<i>Objection 205</i>	<i>Surrey County Council (CW)</i>
<i>Objection 250</i>	<i>GOSE (CW)</i>
<i>Objection 543,553</i>	<i>Wey Estates</i>
<i>Objection 1142</i>	<i>Barratt Southern Counties</i>
<i>Objection 1633</i>	<i>D & M Planning</i>
<i>Objection 1761</i>	<i>Burt Boulton Holdings Ltd</i>
<i>Objection 1781</i>	<i>Consortium of Registered Social Landlords</i>
<i>Objection 1869,C116</i>	<i>CPRE Surrey</i>

Background, Objections, Issues and Consideration

6.3.61. The Policy was concerned with inappropriately located employment premises. A number of Objectors drew attention to the close relationship of this Policy with the preceding Policy 99E3, the second clause of which was concerned with unsuitably located employment sites. Other Objections concerned matters very much like those raised in relation to the previous Policy.

6.3.62. The Council proposed as a result of Objections to combine this Policy with the preceding Policy (PC58), the resulting changes to that Policy having been considered above. The main issue to arise was whether there was a need to keep the Policy in its deposited or some other form, but its purpose, appropriate to the Plan, was, in my view as well as that of the Council, adequately served by the revision of Policy 99E3.

6.3.63. Paragraph 6.26, the reasoned justification of the Policy, would remain as a part of the reasoned justification of Policy 99E3. Again there were suggestions as to the priority that should be given to other uses on redevelopment of unsuitably located employment land. Several Objectors considered that housing should be preferred. In many instances housing is likely to be the most suitable use, but the appropriate use, as is said in the Paragraph, will be a matter to be considered in the local circumstances and I did not see that it would be useful to state priorities.

CHAPTER 6. RECOMMENDATION 5.

6.3.6. That PC60 be made (deletion of Policy 99E4).

POLICY 99E5. RESTRAINT ON BUSINESS, INDUSTRIAL AND WAREHOUSING EMPLOYMENT DEVELOPMENT.

Objectors

<i>Objection 253</i>	<i>GOSE</i>
<i>Objection 395</i>	<i>British Telecommunications plc</i>
<i>Objection 527</i>	<i>Prudential Portfolio Managers</i>
<i>Objection 555</i>	<i>Wey Estates</i>
<i>Objection 802</i>	<i>Guildford Society</i>
<i>Objection 1632</i>	<i>D & M Planning</i>

Background, Objections and Issues

6.3.64. The Policy seeks to confine new employment development to the sites allocated by Policy 99E1, to the redevelopment of existing employment land under Policy 99E2 and to the sites identified in Guildford Town Centre in Chapter 9. The purpose of the Policy is to restrict employment development elsewhere, which could increase employment and exacerbate existing labour shortages, adding to pressures to allocate more housing land and

to in-commuting and congestion. An exception was made for the expansion of existing firms or the accommodation of small firms.

6.3.65. Criticisms of the Policy were that it was adding braces to the belt provided by the principal Policies mentioned above and was not necessary. Objectors saw it could have a role if it were to detail the criteria by which development on other sites could take place and this could be a valuable addition to the Plan. There was again a request that the sites to which various of the Policies of the Employment Chapter apply should be identified on the Proposals Map. Clarification was also sought as to whether the Policy would cover the conversion of public utility premises surrounded by offices to offices. Other comments related to the reasoned justification, in which the employment land available through the Plan allocations and outstanding planning permissions is set out. The main issues were whether the Policy was necessary and appropriate in its expression.

Consideration

6.3.66. The first paragraph of the Policy complements the earlier Policies and, while I share the view that it is not adding very much to those Policies, it does add emphasis to the intention that employment development will be largely confined to the sites identified or described in the Plan. The second paragraph introduces a different aspect of policy, in so far as while Policy 99E2 permits the expansion of existing firms, it is expansion essentially on or immediately adjacent to the existing curtilage. A special provision for small firms is not mentioned in these Policies.

6.3.67. I assumed that this Policy was to be consistent with Policy 99E2 and that it was the Council's intention that the expansion of existing firms on to non-employment land would be expected to be onto adjacent land and proportionally of relatively small scale. A few words could be incorporated into the Policy to make that clear. The circumstances in which small firms may develop outside the defined employment areas is not qualified by definition of a small firm, or of the circumstances in which development might be permitted. As both elements are essentially to add a measure of flexibility in an area important to the local economy in an otherwise rigid policy, it may be that the General Policies of the Plan are sufficient to avoid overloading this Policy with definitions and criteria necessary to its dispensations.

6.3.68. Whether it would be within the scope of the Policy to convert a public utility building surrounded by offices to offices is not a question that can be answered in general. A utility is not an employment use within the terms of this Chapter. If it were to be used as an extension of an adjoining firm, or to house a small firm possibly it would come within its scope, but the answer depends wholly on the circumstances and would need to be looked at in relation not only to this Policy, but others of the Plan.

6.3.69. The inclusion in the reasoned justification of a table of the areas of the allocated sites and of the permitted, but so far unimplemented planning permissions for employment uses, is useful in support of the stance of the Plan that no further land is required in the Plan period. There were suggestions that these figures of area should be converted to potential employment. This would allow a better comparison with the anticipated demand

and the growth of population. That would be so. The conversion of area figures to employment is, however, difficult and could only be done using averages, which can vary among the different employment uses. The figures for area or floorspace can be accurate and provide a regular base for comparisons.

6.3.70. Other points that arose in relation to this Policy, such as the identification of sites on the Proposals Map arose in relation to earlier Policies of the Chapter and have been considered above.

Conclusions

6.3.71. The Council should, in my view, consider further the expression of the second paragraph of the Policy. A few words, such as I have suggested in the Recommendation, could clarify the reference to the expansion of existing firms. Being uncertain of the objective, I have not suggested an alternative wording for the aspect dealing with small firms. The addition at the end of the paragraph of "where they can comply with the General Policies of the Plan" might be sufficient for both concessions.

CHAPTER 6. RECOMMENDATION 7.

6.3.7. That in the second paragraph of Policy 99E5:-

- (a) For "DEVELOPMENT PROPOSALS WHICH MAKE PROVISION FOR THE EXPANSION NEEDS OF EXISTING FIRMS ..." be substituted "DEVELOPMENT PROPOSALS WHICH MAKE PROVISION FOR THE MODEST EXPANSION NEEDS OF EXISTING FIRMS ON IMMEDIATELY ADJACENT LAND ...".
- (b) Give further consideration to the expression of the Policy as it relates to small firms and/or add to the end of the second paragraph:-

"... WHERE THEY CAN COMPLY WITH THE GENERAL POLICIES OF THE PLAN".

POLICY 99E6. EMPLOYMENT IN THE COUNTRYSIDE

Objectors

<i>Objection 478</i>	<i>MAFF (CW)</i>
<i>Objection 556</i>	<i>Wey Estates</i>
<i>Objection 811</i>	<i>Mr P S Barralet</i>
<i>Objection 1093</i>	<i>Councillor Mrs S Greenleaf</i>
<i>Objection 1200</i>	<i>National Trust</i>
<i>Objection 1510</i>	<i>Mr S Fidgett</i>

Background, Objections and Issues

6.3.72. The Policy permitted the limited expansion of employment premises in the countryside, subject to criteria, one of which would confine expansion to the existing site and others which protected the Green Belt and the character and appearance of the countryside. The reasoned justification noted that a significant part of the employment uses of the Plan area were in the countryside.

6.3.73. Objectors saw conflict between this Policy and Policy 99RE2, Development within the Green Belt, and in the Policy itself, in so far as in practice it lacked the flexibility to be of great value to existing firms.

6.3.74. The Council in consideration of the Objections were of the view that there was a conflict with the Green Belt policies of PPG2 and the Structure Plan which indicate a presumption against inappropriate development. The construction of new buildings for employment purposes is not one of the permissible purposes and would be inappropriate development. Accordingly, the Council proposed to delete the Policy and its reasoned justification (PC61), but to add a further Paragraph to the reasoned justification of Policy 99E2 concerning employment development in the rural parts of the Plan area, including the Green Belt.

6.3.75. The remaining issue was whether deletion of the Policy was appropriate, or was there a need to keep some elements of the Policy.

Consideration

6.3.76. There was a conflict between this Policy and the advice of PPG2 and its deletion is appropriate. I have commented on the proposed new paragraph added to the reasoned justification of Policy 99E2 earlier. I have also noted that some of the major employment sites in the Green Belt have been given the status of Major Developed Sites.

6.3.77. There was comment that no provision had been made for catteries and kennels to be located in the countryside. They are certainly businesses in most instances, but they do not fit the definition of employment used in this Chapter. The establishment of such uses would be subject to the Policies of the Rural Environment Chapter and other Chapters of the Plan and as a "sui generis" use a specific policy is not appropriate, nor would it be required.

Conclusions

6.3.78. I accept that the Policy should be deleted.

CHAPTER 6. RECOMMENDATION 8.

6.3.8. That PC61 be made (deletion of Policy 99E6 and its reasoned justification. The addition of a further Paragraph(s) after Paragraph 6.24 was recommended in Recommendation 3, 6.3.3).

POLICY 99E7. HOMEWORKING

Objectors

<i>Objection 203</i>	<i>Surrey County Council (CW)</i>
<i>Objection 254</i>	<i>GOSE</i>
<i>Objection 256</i>	<i>Cranley Road Residents Association</i>
<i>Objection 818</i>	<i>The Guildford Society</i>
<i>Objection 928</i>	<i>Howard Hutton & Associates</i>
<i>Objection 1143</i>	<i>Barratt Southern Counties (CW)</i>
<i>Objection 1279</i>	<i>Robert Shaw and Partners</i>
<i>Objection 1245</i>	<i>Ash Parish Council (CW)</i>
<i>Objection C37</i>	<i>Horsley Countryside Preservation Society</i>

Background, Objections and Issues

6.3.79. In the deposited form the Policy was worded negatively, in so far as proposals for homeworking that would have seriously harmful effects on traffic and amenity for those nearby would be refused.

6.3.80. Objectors stressed that in most instances homeworking proposals would not require planning permission, being subsumed into the residential use of the dwelling, but some definition, or guidance, was necessary as to when permission would be required. Others considered that this guidance would be sufficient and that a specific policy could be dispensed with, the guidance being confined to the reasoned justification, and/or Supplementary Planning Guidance. There was a view that in the current climate, with sustainability objectives being sought homeworking should be encouraged and the Policy worded positively. Several Objectors suggested alternative wordings for the Policy.

6.3.81. The main issues concerned the necessity for the Policy, its expression and whether further explanation was necessary.

Consideration

6.3.82. The Council considered that with homeworking growing and there being obvious advantages to those concerned as well as to the objectives of sustainability, it was desirable to provide a Policy framework. I accepted this, together with the emphasis of the Policy being on the most likely disadvantages of homeworking, the effect on the amenity of neighbouring residents. These are matters covered by the General Policies of the Plan, but there is an advantage to the users of the Plan in having this specific mention of a policy

bearing on householders. The Policy might for this reason be included in either the Employment or Housing Chapters of the Plan, but I had no strong views either way.

6.3.83. The reasoned justification recognises that in many instances planning permission will not be required, and runs against the difficulty of defining the circumstances in which application will be necessary. As this will be wholly determined by what is proposed, I do not see that the Plan could say much more. The suggestion that Supplementary Planning Guidance might be prepared would be worthy of consideration, taking in the aspect of alterations and extensions to houses to facilitate homeworking, as well as the finer points of material change of use and the disturbance to neighbours that can arise from traffic, parking, lighting, out-of-hours working and other activities, if they are significantly greater than would be expected of a dwelling.

6.3.84. I agree that the stance of the Plan towards homeworking should be encouraging. The Council acknowledged that it would be preferable for the Policy to be positively worded and suggested changes to bring this about (PC62).

CHAPTER 6. RECOMMENDATION 9.

6.3.9. That PC62 be made.

6.3.10. That consideration be given to preparing Supplementary Planning Guidance in support of the Policy.

PROPOSED ADDITIONAL POLICY: RELOCATION OF MARKET

Objector

Objection 1285

South East Marts Ltd

Background, Objection and Issues

6.3.85. A livestock and general market was operated by the Objectors on land on the Slyfield Industrial Estate until May of 2000. The site was found to be unsuited to the use and, in consequence, the activity no longer viable. Subsequently, the site was sold and planning permission has been granted for employment use and car showrooms.

6.3.86. The Objectors noted that the market had provided an essential service to farmers over a wide area and had been a significant employer. In their view the Plan should acknowledge its importance and recognise the need to relocate the market. A Policy was proposed:-

The Council recognises the historic and economic importance of the market to the Borough and, subject to other Policies, will support the objective of relocating the market to another site in the Borough.

6.3.87. A reasoned justification was suggested which referred to the strategy of the Objectors to concentrate its livestock business in the Guildford area, for which a new site was required. The characteristics of the site would be set out, and an indication given that the Council supported relocation on another site in the Borough.

6.3.88. The main issue was whether it was appropriate - or necessary - for the Plan to include a Policy favouring the relocation of the market in the absence of an identified site and, if so, the form it should take.

Consideration

6.3.89. The reasons given for the closure of the Slyfield site included lack of parking, difficulties of access, lack of space for expansion, proximity to residential areas and modern requirements for animal welfare. An alternative site would need to overcome those difficulties, some of which may be more strongly related to the general market aspect of the use than the livestock market. The two, however, appeared to be not easily divisible.

6.3.90. The Council has been sympathetic to the relocation of the market, but found the practical problems to be that the market would require a site of a size that was available in urban areas only in such locations as the Slyfield Industrial Estate, already found wanting, or a rural site. The Council had considered a number of sites (details of which were confidential). None was wholly satisfactory and for a rural site the principal problem, even for the livestock market, was that Green Belt policy would not countenance such a use.

6.8.91. I can accept that as an indication of intent and support the proposed policy could have its advantages. I, nevertheless, share the Council's concern that a site suitable to the Objectors and conforming with the planning policies for the Plan area will be difficult to identify. In that context, professions of recognition and support in the form of a Policy could be dangerously misleading if they were to give the impression that concessions were to be made in respect of other policies.

6.8.92. The Plan provides a comprehensive framework of policy which can be used as guidance in searching for suitable sites. This framework would also enable proposals to be properly examined. The key to the search is likely to be contact and cooperation between the Objectors and the Council. A Policy, to my mind, in this instance would do little to aid the process.

Conclusion

6.8.93. Being a specific use for which no site is suggested, and there are substantial difficulties in the way of locating one, I do not consider that the proposed Policy would be a helpful contribution to the problem, or appropriate to the Plan.

PROPOSED ADDITIONAL POLICY: REUSE OF RURAL LAND IN
COMMERCIAL USE

Objector

Objection 809

Mr P S Barralet

6.8.94. The Objector considered that the Plan should include a Policy that would recognise the needs for rural employment and the contribution that could be made by small business developments on sites outside urban areas and the settlement boundaries that have been in commercial use.

6.8.95. The Objector had in mind the site of Barralets Nursery in Pirbright, which is also considered under other Policies, notably Policy 99RE3. In relation to this Objection, while Policy 99E2 allows the redevelopment of existing employment land and buildings, I accept that, once the Proposed Change (PC57) is made it will be directed to the urban areas and the identified settlements only. If extended to the rural areas, the Policy would potentially be in conflict with Green Belt policy. Policy 99E6, which would have gone some way to meeting the suggestion for permitting expansion of existing employment expansion in the countryside, is proposed to be deleted for the same reason (PC61).

6.8.96. However, there is an acceptance of the existence, and the value, of employment sites in the Green Belt beyond the settlement boundaries. While not a Policy, the addition to the reasoned justification of Policy 99E2 proposed by PC61 does give recognition, and indicates an acceptance of extension and even redevelopment on these sites, where it can be seen to be compatible with the purposes of the Green Belt. I do not consider that the Plan can do more.

CHAPTER 7. MOVEMENT

1. INTRODUCTION, SURREY STRUCTURE PLAN, A NEW TRANSPORT PLAN FOR SURREY, TRANSPORT POLICIES AND PROGRAMME, OBJECTIVES AND SUPPORTING MEASURES

7.1.1. A number of Objections embraced two or more of the Sections set out at the beginning of the Chapter and for that reason they are grouped for the purpose of my consideration. Initially, I consider Objections that relate to transportation issues, but for the most part requesting the addition of new Policies, they fitted no particular Section heading. In addition, I noted the points made in two Objections,

Objection 1938

East Horsley Parish Council

who pointed out that effective public transport was needed before seeking to reduce travel by car; and

Objection 2006

Mr J Percy

in which was advocated the provision of by-passes for villages such as Compton, to relieve them of heavy vehicle traffic. I could readily accept that if the reliance on the car is to be reduced, the provision of attractive alternatives is the essential prerequisite, but I did not see that this point was lost on the Council, or the Highway Authority. No proposals for by-passes were before me, although I understood that these were matters that were kept under review.

(a) General Aviation

Objector

Objection 5

General Aviation Awareness Council

Background, Objection and Issues

7.1.2. The Plan does not contain Policies relating to general aviation. PPG13 (paragraph 5.35) notes the value of small airports to serve local business needs, as well as recreational flying. In preparing development plans it is asked that account be taken of the contribution general aviation can make to the local, economy and the benefits of having facilities within reasonable distance of each sizeable centre of population. The Regional Guidance (RPG9, paragraph 6.40) encourages the provision of facilities for general aviation and asks for its needs to be considered.

7.1.3. Having regard to the advice, the main issue was to my mind whether there was a need for the Plan to include a Policy, or give other recognition to the needs of general aviation.

Consideration

7.1.4. There are no airfields in the Plan area and, as far as I was aware, there were no proposals for such development. There are, however, a number of airfields close by, including Farnborough, Blackbushe, Lasham and Biggin Hill, most if not all being available for general aviation use. The demand for a further airfield in the Plan area seemed unlikely to be great and any proposal would be faced with policies to protect the Green Belt and the AONB as well as general countryside and amenity policies.

7.1.5. The Structure Plan contains a general policy on airport development which lists the criteria which would need to be taken into account (Structure Plan Policy MT18). It also has a Policy indicating that any new airfield or the reopening of a disused airfield will not normally be permitted, although there is support for business aviation at Farnborough and Fair Oaks (Structure Plan Policy MT20). The Structure Plan being part of the development plan for the Borough, I see no need to repeat these Policies in the Plan.

Conclusion

7.1.6. In my view it is unnecessary to include a specific Policy, those of the Structure Plan adequately covering development of this sort.

(b) Primary Route Network

Objector

Objection 190

Surrey County Council

Objection and Issues

7.1.7. The County were concerned that the Plan did not make reference to the primary route network (A3 and A31), nor reflect Structure Plan Policy MT3, development alongside the Motorway and primary route networks. The issue was whether the Plan should contain such a Policy or reference.

Consideration

7.1.8. The Structure Plan containing a Policy relating to development adjacent to the primary route network, I did not see it to be necessary to repeat this detailed Policy in the Plan. I noted that the General Chapter (Policy 99G1(2)) was concerned with access matters and a Proposed Change added reference to National policies on transportation impacts, including that for trunk roads. The Objection was conditionally withdrawn on the strength of these proposed changes.

Conclusion

7.1.9. The Structure Plan is part of the development plan for the Borough and therefore Structure Plan Policy MT3 operates in the Plan area. There was no need to repeat

this Policy in the Plan, which, in any case, in Policy 99G1(2) includes a detailed control over access in general.

(c) Motorcycles

Objector

Objection 437

Ms A Szabados

Objection and Issues

7.1.10. The Objector was disappointed that there was no mention of motorcycles and the contribution they can make to easing traffic congestion. Motorcycles were promoted as an alternative to the car, particularly where solo journeys were being made, as in much commuting, and it was thought their use should be encouraged, along with public transport and other alternatives to the car. An immediate and effective means to encourage use of motorcycles was seen to be to provide more, secure, parking for motorcycles. The main issue was whether the Plan needs to take positive measures to encourage the use of motorcycles and to integrate them better into the movement regime.

Consideration

7.1.11. In movement terms, motorcycles have much the same characteristics as cars, using the same road space and contributing to congestion in the peak periods, even if it can be argued that they use road space more efficiently than the car and with sympathetic road use policies that efficiency can be increased. The Council did not see the motorcycle as requiring different consideration from the car, and in the context of aiming for sustainability this I see to be right. The objective is to decrease the necessity to travel and where a need remains as far as is practical to divert it to public transport, a more environmentally friendly mode than even the motorcycle.

7.1.12. The diversion of journeys from cars to motorcycles could be seen as an interim measure, or for some people a long term solution to personal transport needs. The Provisional Local Transport Plan 2000/2001, Local Area Implementation Programme, Guildford Town Transport Programme Area does include a review of parking provision and an intention to provide dedicated, secure on and off street parking provision for "powered two wheelers". To include policies to this effect in the Plan would, however, in my view, not be required, what is to be done being largely a matter for the management of parking and road space rather than land use proposals.

Conclusion

7.1.13. I do not consider that the Plan should include measures for the encouragement of motorcycle use as against that of cars.

(d) Traffic calming

Objectors

Objection 833
Objection 958

The Guildford Society
Guildford Environmental Forum

Objection and Issues

7.1.14. The Society and the Environmental Forum asked for the inclusion of a Policy:-

"Traffic calming and lower speed limits (20mph) should be established in many residential areas."

7.1.15. I considered whether such a Policy was an appropriate or useful addition to the Plan.

Consideration

7.1.16. While I could appreciate the reasons for putting forward the suggested Policies, the principal obstacle to inclusion I saw to be that strictly traffic calming and speed restrictions are not planning matters in those general forms. Such measures are carried out under other legislation and would appear in other policy documents. There would be a possibility of relating such matters to development, but that would not achieve the wider coverage of the policies sought by the Objectors. I concluded that it would not be appropriate, or practical, to include a Policy of this sort in the Plan.

(e) Public transport and the need to use cars

Objectors

Objection 1654
Objections 1811-2
Objection 1938

Country Landowners Association
ARP 050
East Horsley Parish Council

Objections and Issues

7.1.17. The Country Landowners Association asked for recognition that for many dwellers in rural areas public transport was never likely to provide the necessary mobility and that car use would remain an essential part of their way of life. East Horsley Parish Council and ARP050 considered that before restrictions on car use and car parking are imposed adequate public transport needed to be available. ARP 050 suggested that a way to reduce peak period congestion was to stagger working hours. The main issue was whether these were matters that should be covered by the Plan.

Consideration

7.1.18. In all three instances the points raised were relevant to the objective of reducing reliance on the car and encouraging the use of public transport. They are, however, largely truisms and it can be assumed that in the pursuit of the objectives of sustainability they are matters that will necessarily be taken into account. The coordination and balancing of different aspects of policy will be important to the achievement of the objectives. In so far as these objectives will be achieved through land use policies of the sorts appropriate to the Plan they will be mainly dependent on development taking place. Compared to the total of existing development, relatively small changes will come about as a result of development on which the Plan can have a bearing. More may come about through the operation of the Local Transport Plan, but there has to be seen to be a relatively long time scale to the achievement of full sustainability. The sorts of policy statements suggested are not inappropriate to the Plan, as background to the progress towards sustainability, but I do not see them to be necessary and do not recommend that they are added.

Conclusions

7.1.19. I concluded that no change should be made to the Plan.

(f) Objections of Mr J W Bannister

Objector

Objections 1968-76, 1980, 1982, 1989 *Mr J W Bannister*

Objections and Issues

7.1.20. The thrust of Mr Bannisters Objections was that while the Plan was seeking sustainable development and to get the correct balance between development and the environment, in this Chapter there was a total lack of definitive plans, targets, data and detail of any sort on the implications and control measures for traffic. The adverse effects of the impact of more traffic arising from the developments proposed were not addressed. New development, for whatever purpose, should not be allowed to proceed without proper studies and the prior implementation of measures to alleviate the rapidly worsening problems. The Objections concentrated on Guildford Town Centre and proposed that the Plan should give an assessment of the present traffic problems and contain strong measures of amelioration, among them

- the quantification of present traffic loads at key points.
- the projected impact on these points of developments already in progress, to provide a base point.
- the impact on these points of proposed developments. New developments should be able to show a reduction in traffic, directly or by reductions elsewhere.

Targets for reducing traffic and air pollution in the Plan period should be included for each of the initiatives in the Chapter.

- measures to exclude through traffic and to make parking prohibitive to force the use of Park and Ride.
- pedestrianisation of North Street and Upper High Street.
- explanation of why the take up of Park and Ride would not be increased if its use were free.
- a better explanation of the requirement for commuted payments from developers in lieu of parking, based on the cost of alternative provision of a Park and Ride site. This simple equation does not take in the costs of the traffic impacts of driving into and parking in the town centre.
- subsidise bus services by setting this against the cost of the adverse traffic impacts.
- improve safety for pedestrians between the railway station and the town centre.
- include examples of traffic reduction concessions negotiated when approving the A3100 Guildway and railway station office developments as an indication of the Council's powers and intent.
- enforce speed limits.

7.1.21. Other Objections, considered elsewhere, concerned individual sites in the town centre.

7.1.22. The main issues to arise were how far the Plan (as opposed to other non-land use plans and policies) should include these matters.

Consideration

7.1.23. While Mr Bannister appeared to be mainly interested in the considerable traffic problems of Guildford Town Centre, the points he raised are general considerations, if not for the Plan itself, for the totality of efforts by a number of authorities towards the management of traffic in the Plan area. Some changes have been proposed to the Plan since the Objections were made. These included adding a reference to the Government's requirements embodied in the Road Traffic Reduction Act for authorities to set targets to reduce traffic, or to reduce its rate of growth (PC64 and PC67).

7.1.24. The Council alluded in their response to the Objections to the importance of the Local Transport Plan (prepared by Surrey County Council and to replace the TPP system) in regard to analysis of the present traffic situation and targets for restraint. It is through the Local Transport Plan that many other of Mr Bannister's matters of concern will also be met. The Provisional Local Transport Plan 2000/2001 was published in June 1999, after the Objections were made.

7.1.25. With regard to Guildford Town Centre, the Local Transport Plan includes a Local Area Implementation Programme. This is to be complementary to the movement strategy of the Plan, both taking account of the Surrey Structure Plan, Surrey Transport Plan and the Guildford Movement Package.

7.1.26. While accepting that the matters raised by Mr Bannister are very relevant to proposals for development in the Plan area as well as in the central parts of Guildford, the

key to the proper operation of the system now in place to achieve the objectives of sustainability in general as well as in new development lies in the sensible coordination of the different plans and procedures. My view was that his concerns are being met. The Plan is only one part of the machinery being established to meet the sustainability objectives and at the local level to seek a solution to particular traffic problems.

7.1.27. I do not, therefore, see a need to include in the Plan matters that are dealt with in other plans and through other machinery than the land use planning system. My only suggestion is that as well as including brief sections in the Introductory parts of this Chapter mentioning the roles of the Surrey Structure Plan, A New Transport Plan for Surrey and the Guildford Movement Package, a section is added describing briefly the (Provisional) Local Transport Plan. The mention in Paragraph 7.4, no doubt adequate when the Plan was deposited, no longer seems to go far enough in setting out the scope of the Local Transport Plan, including the proposals following the Road Traffic Reduction Act. I have not suggested a wording.

CHAPTER 7. RECOMMENDATION 1.

7.1.1. That a Section be included in the opening part of the Chapter referring to the (Provisional) Local Transport Plan 2000/2001 and the relationship between the objectives and proposals of this and other relevant plans.

INTRODUCTION

Objectors

<i>Objection 333</i>	<i>Councillor G Bridger</i>
<i>Objection 526</i>	<i>Prudential Portfolio Managers</i>
<i>Objections 822-4</i>	<i>The Guildford Society</i>
<i>Objections 877-81</i>	<i>Guildford Environmental Forum</i>
<i>Objections 1872/74</i>	<i>CPRE Surrey</i>
<i>Objections 1942-3</i>	<i>East Horsley Parish Council</i>
<i>Objection C38</i>	<i>Horsley Countryside Preservation Society</i>

Background, Objections and Consideration

7.1.28. The Introduction sets out briefly the background for the remainder of the Chapter, referring to the present traffic situation, the geographical and infrastructure limitations, areas of responsibility and the role of the Plan in setting objectives, policies and proposals for movement in the Plan area. Subsequent Sections mention the objectives of other plans that bear on movement, the Structure Plan, the Transport Plan for Surrey and the Guildford Movement Package. There is mention in the Introduction of the Local Transport Plan newly prepared by Surrey County Council, the importance of which to my mind warrants a further Section of its own in this opening part of the Chapter. This would also meet one of the Objections of the Guildford Environmental Forum.

7.1.29. The Objections suggested various changes and additions to the Section. Reference to the geographical constraints and limited infrastructure was requested and proposed to be added by PC63. Two Objectors asked for reference to the ultimate objective of reducing traffic levels. The (Provisional) Local Transport Plan does not see this as possible in the Plan period (to 2006) and in its fifteen year period goes no further than to seek somewhat tentatively to restrain traffic levels to those of 1998. Certainly in the longer term the intention would be to bring about reductions, but I consider that the Plan would be reflecting policy more accurately by mentioning what the Local Traffic Plan sees to be practical and the time scales involved. The tackling of peak period congestion could be more immediate. The Plan supports the improvement of public transport and alternative means of transport to the car, as do other plans.

7.1.30. The Council proposed adding reference to the Road Traffic Reduction Act (PC64 and PC67) and a change to Paragraph 7.6 to emphasise that, as expressed by PPG13 it was the reduction of the need to travel by car, rather than the reduction of the demand, that was the objective (PC66). While there is always room for improvement, and I noted that Objectors considered it was not sufficiently clear, the Section, and those that follow, to my mind adequately described the balance of responsibilities for highway matters between the County Council and the Council and the role of the Plan, subject to my suggestion that the Local Transport Plan be given a fuller explanation.

7.1.31. There was a suggestion from East Horsley Countryside Preservation Society that Chapter 17, Implementation and Monitoring, should include reference to the objectives of the Road Traffic Reduction Act. Chapter 17 says nothing about the implementation or monitoring of progress towards the movement objectives. The Local Transport Plan, however, has quite a lot to say and the Council may now find it appropriate to add the salient points of this in so far as they apply to the Plan to Chapter 17.

CHAPTER 7. RECOMMENDATION 2.

7.1.2. That PC63, PC64, PC66 and PC67 be made.

7.1.3. That consideration be given to including in Chapter 17 reference to the implementation and monitoring proposals of the Local Transport Plan, in so far as they are relevant to the objectives and policies of the Plan.

SURREY STRUCTURE PLAN 1994

Objector

Objection 823

The Guildford Society (CW)

7.1.32. The Objectors asked for a new paragraph to be added after Paragraph 7.7 referring to the Road Traffic Reduction Act. The Council proposed to add the reference to Paragraph 7.4 in the Introduction (PC64 and PC67) which appeared to me to be a preferable

place for the insertion and was considered by the Objectors to meet their point. Making the proposed change is recommended above (Recommendation 7.1.2).

A NEW TRANSPORT PLAN FOR SURREY

7.1.33. The Section gave rise to no Objections.

TRANSPORT POLICIES AND PROGRAMME (TPP): GUILDFORD MOVEMENT PACKAGE. OBJECTIVES

Objector

Objections 820,824

The Guildford Society

7.1.34. Paragraphs 7.13 and 7.14 give the main points of the strategy of the Guildford Movement Package and the objectives of the Plan respectively. The Guildford Society asked for more information to be given of the Movement Study and Package and examples to clarify how the objectives were to be achieved. The Council pointed out that how the objectives were to be achieved is set out in the individual policy areas. In so far as the objectives of the Plan are concerned, I accept that is the case, although I can also see that the short time scale of the Plan and the other plans and policy initiatives that are involved make the proposals and policies of the Plan seem inadequate for the major task in hand. That, however, is not said in criticism. The Plan is playing its part and there are in the Plan initiatives which go towards each of the Objectives. I do not see it to be necessary to include more information, or to expand these Paragraphs with an explanation.

SUPPORTING MEASURES

Objector

Objections 1942-3

East Horsley Parish Council

7.1.35. The Objections raised two different points. The first was that footways are required for many roads; rural roads without footways are a positive danger, particularly in the longer hours of darkness in winter. This was accepted by the Council, but pointed out to be a matter less for the Plan than for the Local Transport Plan.

7.1.36. The second point was that traffic calming by means of "islands" tended to create slalom racing areas in between! The point was noted and is a consideration for the design of traffic calming schemes, although not a matter specifically for the Plan. I do not consider that either point needs to be addressed in the Plan.

2. TRANSPORTATION PROPOSALS AND STUDIES

POLICY 99M1 MAJOR TRANSPORTATION PROJECTS

Objectors

<i>Objection 108</i>	<i>Mr E Reid</i>
<i>Objection 163</i>	<i>St Catherine's Association</i>
<i>Objection 257</i>	<i>GOSE (CW)</i>
<i>Objection 459</i>	<i>CPRE Waverley</i>
<i>Objection 533</i>	<i>Waverley Borough Council (CW)</i>
<i>Objection 561</i>	<i>Mr I C Macpherson</i>
<i>Objection 585</i>	<i>Prime Health (now Standard Life Healthcare)</i>
<i>Objection 639</i>	<i>Mr R M Seymour</i>
<i>Objection 694</i>	<i>Cranley Road Area Residents Association</i>
<i>Objection 825</i>	<i>The Guildford Society</i>
<i>Objection 1261</i>	<i>Guildford Chamber of Commerce</i>
<i>Objection 1349</i>	<i>W F Electrical Plc</i>
<i>Objection 1382</i>	<i>Guildford Business Forum</i>
<i>Objection 1431</i>	<i>Environment Agency</i>
<i>Objection 1509</i>	<i>Mr S Fidgett</i>
<i>Objection 1875</i>	<i>CPRE Surrey</i>
<i>Objection 1796/8</i>	<i>Mr A E Rees</i>
<i>Objection 1934</i>	<i>Mr T Harrold</i>
<i>Objection 1981/4</i>	<i>Mr J W Bannister</i>
<i>Objection 2006/8</i>	<i>Mr J Percy</i>
<i>Objection C223</i>	<i>Mr & Mrs T N Jones</i>
<i>Objection C224</i>	<i>Mr & Mrs G W Wright</i>
<i>Objection C225</i>	<i>Mr D F Buchanan</i>

Background, Objections and Issues

7.2.1. The Policy listed ten transportation projects programmed for the Plan period. It set out the major capital programme of Surrey County Council as it affected the Plan area. No major road building was proposed. A number of transportation projects were mentioned, although no land for safeguarding, should it prove necessary, could be identified at this stage. Mr Stephens considered this comment in Paragraph 7.15 unhelpful. I could appreciate that the comment could be seen to have a blighting effect in areas where projects were proposed, but it appeared to me to be more helpful to have a forewarning of what was being considered.

7.2.2. PPG12 indicates that it would be a function of the Plan to make site specific proposals for road and other transportation schemes likely to start in the Plan period and to safeguard the land required for them. GOSE considered that with no site specific proposals to include in the Plan, the Policy was unnecessary, although it was appropriate to make reference to the individual projects. I do not disagree with this and agreed with the Council's

proposed change which would remove the Policy itself, leaving the summary of each project contained in the reasoned justification (PC68).

7.2.3. Beyond that, the Objections related mainly to individual projects. In so far as the projects were those of the County Council - in many instances studies - and only listed in the Plan, there was little that I could do but report Objectors misgivings or suggestions and the comments of the Council. That I have done in relation to each of the projects for which there were concerns. The main issue was whether the Plan was giving an accurate picture of what was under consideration.

Consideration

(a) Paragraph 7.16. Projects numbered in Policy 99M1

1. Guildford Movement Package

7.2.4. Objection to this project was that it would not produce an integrated transport system. That may be so, but the Package is likely to be overtaken by the Local Transport Plan, integration being one of its objectives. It may be that the reference in the Plan will need to be updated.

7.2.5. Included in the Package was the consideration of pedestrian priority in Bridge Street and restriction of through movement in Walnut Tree Close, Guildford. A number of Objectors were concerned that these measures would add to congestion at a critical point for traffic movement in the Town Centre and interfere with access to commercial buildings. There were also concerns that restricting this route would lead more traffic to use other routes outside the Town Centre. Walnut Tree Close was seen as such an important access to the Town Centre that, rather than closure to through traffic, it would reward improvement. There was a general view that the Plan should contain more detail of the various proposals making up the Package.

7.2.6. The Council's response was that the individual element of the Package would be subject to feasibility studies and consultative procedures. The proposed closure of Walnut Tree Close had been brought forward from the adopted plan and attracted a large measure of support. The Plan did not, however, convey any commitment to the closure. The Guildford Gyratory System, including Bridge Street, had been the subject of a recent consultants' study and will be the subject of further proposals and consultation. The closure of Bridge Street to traffic was not proposed, but the studies may include looking to ways to remove through traffic while aiding the pedestrian links between the railway station and the Town Centre. The Council promised to be sensitive to the needs of existing businesses.

2. A25 Route Management Plan

7.2.7. Cranley Road Area Residents Association suggested that as part of the plan there should be a Park and Ride site to cater for traffic being fed in to Epsom Road by the A25, A246 and A247. A triangular site to the south of the West Clandon traffic lights was suggested. The Council's response was that the search for a Park and Ride site to serve the

eastern part of the Guildford was being actively pursued. A number of sites were being considered. The site suggested was not among them, and was in the Green Belt. Were it to arise, Policy 99M5 would provide the necessary policy base.

3. A3100 Guildford - Milford Corridor Study

7.2.8. There was comment that the study should be completed before any new developments are approved. A Policy should be included in the Plan limiting development in the Corridor and promoting a cycle route. The Council indicated that the timing of the study was not within the scope of the Plan, but that the Policies of the Plan would require consideration of the highways implications of proposals for development, in the larger cases requiring Traffic Impact assessments. A cycle route along the A3100 was a part of the network of cycle routes being proposed in Policy 99M8 as a result of PC69.

6. District Cycle Network

7.2.9. The Council has now adopted a cycle strategy which includes specific routes. The Council proposed changes to the Plan to incorporate the strategy, into Policy 99M8 and the routes into the Proposals Map. A number of Objectors, notably those living in Lynx Hill, East Horsley, were concerned at the implications of a route on their road. These Objections are considered in relation to Policy 99M8. Mr Stephens noted that one route would necessarily pass through the grounds of the University of Surrey, which in the later detailed proposals it does.

7.2.10. Waverley Borough Council asked that the mention of the project should include:-

"The Council will seek to ensure that the District Cycle Network connects with cycle routes in adjoining districts."

Having progressed further since the Plan was deposited, the routes proposed appear to have taken this need into account. There could, however, be grounds to mention it in Policy 99M8, or its supporting Paragraphs.

10. Pirbright/Brookwood Traffic Management Scheme

7.2.11. Mr Fidgett commented that the Plan should give a trreater explanation and details of the works proposed for the Pirbright and Brookwood traffic calming measures. The Council was of the view that this could not be done at this stage and that would need to await the studies and consultation procedures yet to come.

(b) Other highways matters

Compton By-pass

7.2.12. Mr Macpherson and Mr Percy asked that a by-pass for Compton be proposed. The Council responded that there were no proposals currently under consideration for a by-pass for Compton and a proposal would not therefore be appropriate. I was given to

understand that the County Council was intending to undertake a management review of the B3000 through Compton, but no work was programmed at that time.

Additional access from the A3 to Guildford

7.2.13. Mr Rees considered that the congestion at the present access points suggested that there should be an additional access point made close to the Stoke intersections. Mr Rees' point is easily understood by those coming into Guildford, the Stoke intersections and the Dennis Roundabout being heavily congested. For inclusion in the Plan, however, there would need to be such a proposal, originating from the Highways Agency. Currently there was no such proposal and the best that could be said was that a new junction would be so close to those existing as to be unlikely to find much support from the Highways Agency.

Access between Guildford Railway Station and the Town Centre

7.2.14. CPRE Surrey wished to see reference among the listed projects to improvement of the link between Guildford Railway Station and the Town Centre. The Council accepted the need to improve pedestrian and cycle links between the railway station, bus station and the Town Centre. The Council proposed an addition to Policy 99M8 referring to the provision of safe cycle routes linking railway stations in general with areas of homes, work and recreation (PC80) and an addition to Paragraph 7.52:-

"The Council recognises the need to improve pedestrian links between Guildford Bus Station and the Railway Station"

(c) Paragraph 7.17. Woodbridge Road Scheme

7.2.15. The scheme for dualling Woodbridge Road from the end of the existing dual carriageway to Stockton Road was referred to in the Plan only in this supporting Paragraph of the Policy. The Paragraph indicated that the scheme was dependent on the development of adjoining land, allocated under Policies 99GT5/6.

7.2.16. The Environment Agency sought the addition of advice concerning the impact of the scheme on the River Wey and its floodplain and the Council agreed that this should be added by PC70.

7.2.17. A concern to my mind was that this road scheme, which apparently would affect land outside the highway boundary, is not alluded to in Policies 99GT5/6, which it would appear to affect, or shown on the Proposals Map. If these developments are anticipated to take place in the Plan period, and for that reason included in the Plan, this road proposal should also be included. I return to this in my consideration of these Policies.

(d) Paragraph 7.18. A320 Route Management Scheme

7.2.18. The indication in the Plan was that a major scheme for the A320 to the north of Guildford had been abandoned by the County Council. There would, however, be a low-

cost range of measures to improve safety. These would appear to be works that would not require identification in the Plan. There were no Objections recorded to the Paragraph.

CHAPTER 7. RECOMMENDATION 3.

- 7.2.1. That PC68 be made (deletion of Policy 99M1).
- 7.2.2. That PC70 be made.
- 7.2.3. That the following be added to Paragraph 7.52:-

THE COUNCIL RECOGNISES THE NEED TO IMPROVE PEDESTRIAN LINKS BETWEEN GUILDFORD BUS STATION AND THE RAILWAY STATION.

POLICY 99M2. ACCESS FROM WALNUT TREE CLOSE TO THE RAILWAY STATION

Objectors

<i>Objection 790</i>	<i>University of Surrey (CW)</i>
<i>Objection 890</i>	<i>Guildford Environmental Forum (CW)</i>
<i>Objection 1434</i>	<i>Environment Agency</i>
<i>Objection 1876</i>	<i>CPRE Surrey</i>

Background, Objections and Issues

7.2.19. The alternative route from Walnut Tree Close to Guildford Railway Station was identified in the Guildford Movement Study 1990 and is a proposal of the adopted plan. The Study saw a need for a link to the Railway Station for the use of Post Office vehicles, which would allow the closure of Walnut Tree Close, removing through traffic and creating a priority route for buses and cyclists, as well as improving conditions for pedestrians. As mentioned earlier, closure of Walnut Tree Close is not currently proposed, but it will be managed to make it less attractive to through traffic. The provision of an alternative route to the Station for the Post Office would, however, open the possibility of closure, which remains a longer term ambition of the Council. It was questioned whether the Post Office still handled mail at the Station and therefore needed the access, but access would still be needed in general, if not for the Post Office in particular.

7.2.20. The Environment Agency asked for the inclusion of reference to the scheme cutting across the River Wey and its floodplain. The Council proposed this addition in PC71, a proposed change which also added consideration of the new route as a cycleway, a suggestion of the University of Surrey. Other Objections were to the implications of the loss of the route provided by Walnut Tree Close for other routes.

7.2.21. The main issues remaining were whether the advantages of the scheme would outweigh the disadvantages.

Consideration

7.2.22. A number of Objections to the proposals for Walnut Tree Close and Bridge Street made in the Guildford Movement Package are included in my consideration of Policy 99M1. Although this proposed length of road is a separate proposal, Walnut Tree Close feeding into the Guildford Gyratory System, it forms a part of the broad consideration of that System. A major element of the benefits of the scheme for Walnut Tree Close was that a reduction in through traffic would bring significant environmental improvements to residents in the road, not least by discouraging heavy vehicles from the industrial estate at Ladymead using it to reach the Guildford Gyratory System. It would also allow better links to be formed between the Railway Station and the Town Centre and improve access for buses and cyclists as well as pedestrians. The Policy attracted a good measure of support from local residents.

7.2.23. The proposals for Walnut Tree Close, it appeared, were that the route be managed to make it less attractive to through traffic, by means of a scheme that gave priority to buses and other vehicles leaving the Station and biasing the traffic lights at the exit to the Gyratory System to favour the Farnham Road traffic. To achieve this, and the accompanying environmental benefits, the new access for Post Office vehicles and station visitors that was the subject of this Policy was necessary. The Council accepted that there could be effects on other routes from deterrence of the use of Walnut Tree Close, but saw this as a matter that would be taken into account in the monitoring of the proposals and in wider studies of traffic in the Town Centre.

Conclusions

7.2.24. The Plan should recognise that the proposal would cross a part of the River Wey flood plain and that it provides an opportunity to provide an important link in the cycleway network. The scheme for Walnut Tree Close will have effects on other traffic routes, the seriousness of which and the need for remedial measures being best determined by the process of monitoring traffic flows.

CHAPTER 7. RECOMMENDATION 4.

7.2.4. That PC71 be made.

3. MOVEMENT AND DEVELOPMENT

POLICY 99M3: LOCATION OF DEVELOPMENT

Objectors

Objection 258

GOSE (CW)

<i>Objection 449</i>	<i>Highways Agency</i>
<i>Objection 616</i>	<i>MOD</i>
<i>Objections 792, C269</i>	<i>University of Surrey</i>
<i>Objection 826</i>	<i>The Guildford Society</i>
<i>Objection 1565</i>	<i>St Martha Parish Council</i>
<i>Objection 1696</i>	<i>College of Law</i>
<i>Objection C23</i>	<i>Guildford Environmental Forum</i>
<i>Objection C263</i>	<i>Sainsbury's Supermarkets Ltd</i>
<i>Objection C276</i>	<i>Surrey County Council</i>

Background, Objections and Issues

7.3.1. In its deposited form the Policy restricted development generating significant numbers of trips to locations highly accessible by public transport and served by existing cycle and pedestrian routes. In other locations such development would only be permitted where adequate provision can be made. Outside Guildford Town Centre, such developments would require a Company Transport Plan.

7.3.2. There were a number of Objections which criticised the wording of the Policy in various ways, GOSE going so far as to suggest that it was in the wrong Chapter and that Company Transport Plans being of an administrative nature, reference to them should be in the supporting paragraphs rather than the Policy. Several Objectors thought it lacked clarity as to the developments that would be caught by its terms and sought closer definition. Others required guidance on Company Transport Plans. Reference to the need for Traffic Impact assessments for developments on Trunk roads was requested.

7.3.3. The Council proposed several changes to the Policy and its reasoned justification, these including the removal of the sentence dealing with Company Transport Plans from the Policy, a new Policy being proposed to set out a requirement for "Green" Transport Plans to be submitted, with information in the reasoned justification as to the issues they should address. The addition was proposed of Park and Ride among the public transport services. The exemption from the Policy of sites in Guildford Town Centre was removed. Further, it was proposed to move the Section with its Policies to the General Policies Chapter (PC72, superseded in this Chapter by PC227). These gave rise to some Counter-Objections. An addition referring to Traffic Impact Assessments was proposed to be added to the reasoned justification of Policy 99G1(2) (PC72).

7.3.4. The main issues were whether the Policy was appropriately expressed for its purpose.

Consideration

7.3.5. The proposed changes went a long way to meeting the criticisms of Objectors, although not all could be met in this way. Among the Objections was a suggestion that, as well as in highly accessible locations, developments should be permitted in locations that would provide improvements to non-car modes of transport. If a site were in a sustainable location, it would, it was suggested, be grounds for relaxing the inner boundary of the Green

Belt. In so far as the Plan is concerned, relaxation of the inner boundary of the Green Belt, having regard to Green Belt policy, would not be a practical possibility. That is not to rule out such considerations in the longer term, when the need for land for development that is in locations that are of the best in sustainability terms may require Green Belt boundaries, particularly where they abut towns such as Guildford, to be looked at carefully, initially through the mechanism of the Structure Plan. The same considerations may also make it necessary to review the potential of sites on the edge of the Town Centre or beyond against sustainability criteria, favouring the established transport routes.

7.3.6. There was support for the proposed changes, but not every Objector was satisfied and there were some Counter Objections. These included Objection to the loss of the Company Transport Plans paragraph from the Policy. However, the addition of a further Policy on Green Transport Plans makes up this loss. There was a request that more guidance on Green Transport Plan be given. The draft of the revision of PPG13 gives guidance on appropriate thresholds at which such plans should be sought. The County Council suggested that there might be reference to the guidance on Green Transport Plans which they were preparing. The Council was unwilling to refer to a draft document, as I am unwilling to support an importation from a draft PPG, but by the time the Plan comes to adoption it is likely that both will have entered a final form and a decision should be made then on the inclusion of the policy and the form of its support.

7.3.7. A further Counter Objection was to the addition of Park and Ride to the requirement for accessibility by public transport. It was pointed out that PPG6 and PPG13 spoke in terms of public transport, foot and bicycle, without this additional requirement. However, it seemed to me that the advice was presented in the round. Many towns have no Park and Ride arrangements and may never aspire to them. Guildford already augments its public transport in this way and it is a mechanism for access to the Town Centre likely to be of growing importance. The wording proposed for the Policy does not make access to a development site by Park and Ride a necessity, it simply lumps it with public transport. I saw it as advantageous to refer to Park and Ride in the Policy, to ensure that it is taken into account in those parts of the Plan area to which it is appropriate, principally the centre of Guildford.

Conclusions

7.3.8. This Policy will be substantially altered by the proposed changes of PC227. I have reservations on them only in respect of the proposed new Policy which relies on the draft revision of PPG13. I, nevertheless, recommend that the change be made, and this new Policy added, subject only to the advice in the eventually published PPG13 not being significantly different.

CHAPTER 7. RECOMMENDATION 5.

- 7.3.1. That PC227 be made (alteration to Policy 99M3, addition of a further Policy and transfer of the Section to the General Chapter), subject to the advice in the new edition of PPG13 when published being substantially the same as in the draft.

4. PARKING POLICY

Objectors

<i>Objection 141</i>	<i>Worplesdon Parish Council (CW)</i>
<i>Objection 261</i>	<i>Cranley Road Residents Association (CW)</i>
<i>Objection 450</i>	<i>Highways Agency</i>
<i>Objection 494</i>	<i>University of Surrey (CW)</i>
<i>Objection 829</i>	<i>The Guildford Society (CW)</i>
<i>Objection 929</i>	<i>Howard Hutton Associates</i>
<i>Objections 934/938</i>	<i>Guildford Environmental Forum</i>
<i>Objection 1877/8</i>	<i>CPRE Surrey</i>
<i>Objection C259</i>	<i>Railtrack</i>
<i>Objection C260</i>	<i>HBF</i>
<i>Objection C264</i>	<i>Sainsbury's Supermarkets Ltd</i>
<i>Objection C266</i>	<i>Royal Surrey Hospital</i>
<i>Objections C277/8</i>	<i>Surrey County Council</i>

Background, Objections and Issues.

7.4.1. The Section sets out a full account of Parking Policy, containing only Policies relating to Parking Provision within Guildford Town Centre (proposed to be changed to Long Stay Parking within Guildford Town Centre (PC229)) and Park and Ride Sites. The principal Policy relating to parking in connection with new development is Policy 99G1(1), the parking standards to be applied being in Appendix I. Among the proposed changes PC225 substituted the County Council's latest standards for those in the deposited version of Appendix I.

7.4.2. Some of the more general matters raised in Objections were considered in relation to Policy 99G1(1). In this Section Objections tended to be related to specific phrases or paragraphs expressing particular aspects of the policy and I have considered them in that way. The issues were whether the aspect of policy was appropriate or suitably expressed.

Consideration

(a) Paragraph 7.27.

7.4.3. This Paragraph contained the four objectives of the parking policy of the Plan. The Objections related to the third objective, the support of short term parking for shoppers in Guildford Town Centre. It was considered that this should not be an objective of the Plan, or one only for the interim period while alternative transport arrangements were put in place.

7.4.4. The difficulty I shared with the Council here was that the short term parking facilities are a necessary part of the maintenance of the vitality of the shopping centre, and, while a contributory factor to creating traffic congestion, they are not to be seen in the same light as long term commuter parking, a contributor to peak hour traffic flows and to peak hour congestion. The nature of the catchment area of Guildford Town Centre means that

replacement of car use with adequate public transport for many of the more rural areas will be difficult.

7.4.5. The intention of the Plan to discourage long stay parking and to improve short stay is featured in the Provisional Local Transport Plan. It would not, therefore, be appropriate to remove or to imply this was no more than an interim objective.

(b) Paragraph 7.29 - 7.31 (Parking Standards for New Development).

7.4.6. The Highways Agency considered that parking standards outside Guildford Town Centre should be more restrictive. The new County Council standards to be imported into the Plan are more restrictive than those of the Plan as deposited. The Council also proposed that it should be clear that the standards were intended to be maxima for non-residential developments. This gave rise to a Counter Objection that the change implied that the standards for residential development were expressed as minima. The Council proposed that this should be qualified by adding a further sentence:-

"The residential standards are minimum standards except in Guildford Town Centre where they will be applied as maxima."

7.4.7. Howard Hutton and Associates were concerned that the application of the policy could mean that existing car parking levels could not be retained on redevelopment and that this could result in schemes not coming forward. If this is to be a feature of the policy a further Policy should be included by which there could be a structured reduction of parking provision geared to the improvement of public transport. The Council accepted that there would be some discouragement of redevelopment in the Town Centre, but was reassured that a restrictive approach to car parking provision having been in force for some years, development had continued. A pragmatic approach would be taken to the provision of parking space in relation to existing levels and a specific Policy to this end was not required.

7.4.8. I agreed that it would be necessary to look at individual cases on their merits, but the objective was clear and one that could be easily undermined if significant developments did not follow its precepts. I noted that the proposed changes include some enlargement on the way this aspect of policy would be put into effect, and extended the intention to reduce parking provision to below the standards where public transport provision made it possible. With the Council, I did not see that a further Policy was required.

7.4.9. The Royal Surrey Hospital's Counter Objection was that the maximum standard for new hospitals was too low while adequate access by public transport from the catchment area was unavailable. It was also said that it should be clear that the standards applied only to new development and any excess in relation to the standards on an existing site should not be taken into account when further development was proposed. It was also complained that the intention to restrict parking and to seek contributions for public transport improvements introduced an element of uncertainty into the Plan, as did the intention to restrict parking provision outside the Town Centre "in consultation with local residents and the business community."

7.4.10. As to the standard for hospitals, that has been adopted from the County Council's standards and must be assumed to have been properly drawn up and to be accurate in terms of the likely needs, balanced against the intentions to restrain traffic growth. I could appreciate the problems of the Hospital when it is serving a large catchment area and inevitably many of its patients and their visitors will find public transport not adequately serving their needs. It is, nevertheless, not unreasonable to take into account the existing parking space available when considering new developments and, with whatever adjustments are made necessary by the circumstances - such as the availability of public transport - to adjust the further parking provision accordingly. Extending the intention to require parking at below the standards beyond the Town Centre was qualified by reference to the availability of public transport.

7.4.11. Railtrack objected to the restraint on parking provision in Guildford Town Centre as it might apply to the railway station, in so far as long-term station parking was contributing to sustainable travel. With development of the station proposed by a later Policy of the Plan a need could be foreseen to increase parking provision at the station, any move to restrain provision or to bring about a reduction possibly frustrating development. It was suggested that the Plan might note the position of parking related to railway use.

7.4.12. It appeared to me that the emphasis of the Plan on sustainable transport, including rail travel, already made the necessary connection between parking ancillary to stations and the use of the railway. A distinction would need to be drawn in any schemes for redevelopment of the station and its surroundings, if it included parking for the use of the development as opposed to that for railway passengers. That would be an obvious distinction which the Plan would allow to be made and I saw no need to further elaborate in the Plan itself.

7.4.13. This Section refers to the Council seeking contributions to public transport, etc., instead of on site parking provision. The principal Policy in this respect has to be seen to be Policy 99G3 and the contributions to be arrived at by negotiation. The HBF made the point that as it is the Plan's policy which is dictating a lower on-site provision in the Town Centre, and taking as its starting point that public transport is already good, there is an argument against expecting contributions for public transport improvements from developers. I accept that the relationship between the needs or impacts of the development and the desire to concentrate movement on public transport is in those circumstances tenuous, but it is appropriate to suggest circumstances in which such planning benefits might be sought. It would not, however, be appropriate to go beyond the advice of Circular 1/97 to make an expectation or set a tariff or otherwise to seek to give significantly greater precision to the sums to be looked for. In considering whether an area was one in which parking provision could be reduced, it would not seem unreasonable to take into account local views and experience.

7.4.14. I have not suggested any further changes to paragraph 7.31 on this account. The Council proposed a change to Policy 99G1(1) to substitute "will seek from developers" for "will expect developers". I also felt that Policy 99G3, with my suggested changes, will ensure that this Policy is administered in accordance with the advice.

(c) Paragraphs 7.33 - 7.36. (Park and Ride)

7.4.15. The Objection of the CPRE followed their Objection to an earlier part of the Section. They looked to Park and Ride to meet short stay as well as long stay needs. The value of short stay parking to the essential functioning of the Town Centre was mentioned earlier. Park and Ride might be able to meet some short stay needs, but generally it is most effective for longer stay parking. I did not consider that this aspect of the policy should be changed.

7.4.16. In addition, the Guildford Environmental Forum suggested adding a sentence to Paragraph 7.33:-

"Where Park and Ride is provided as an alternative then its provision should be matched to traffic levels in the catchment area it serves."

I assumed that what was meant was that a Park and Ride site should have sufficient, but not too much, capacity for the traffic on the radial route it would serve that would have the need to use it. If that was the case, that would be something of a truism, although in practice, and at this stage when there is still much persuasion to be done to get motorists to use Park and Ride and further radial routes still to be served such careful matching may not always be possible. I have no doubt such an objective would be uppermost in the Council's mind when new sites come forward and I do not see a need for it to be stated in the Plan.

7.4.17. The County Council asked for "the" to be added in the penultimate sentence of Paragraph 7.35.

Conclusions

7.4.18. This Section has to be seen as drawing its force from the Policies of the General Chapter as well as the two Policies it includes. In its revised form, once the proposed changes were made, I considered it to be expressing clearly an important part of the strategy of the Plan towards sustainability. The objective has to be seen as relatively long term, but the facets of the policy that were criticised have to be seen to be necessary. Interpretation and application will require flexibility on the sides of both developers and the Council, but I saw no unnecessary rigidity or a threat to the adequate servicing of important community facilities such as the Hospital or the vitality of the town centre as a shopping and business centre. That the stance of the Plan towards parking in the Town Centre should, as circumstances permit, be applied to other good public transport nodes or corridors appeared a logical extension of the policy.

CHAPTER 7. RECOMMENDATION 6.

7.4.1. That PC228 be made.

7.4.2. That in Paragraph 7.29 the following sentence be added as the penultimate sentence:-

THE RESIDENTIAL STANDARDS ARE MINIMUM STANDARDS EXCEPT IN GUILDFORD TOWN CENTRE WHERE THEY WILL BE APPLIED AS MAXIMA.

7.4.3. That PC229 be made.

7.4.4. That in Paragraph 7.35 in the penultimate sentence "THE" be added after "... CO-ORDINATED APPROACH TO ...".

POLICY 99M4. PARKING PROVISION WITHIN GUILDFORD TOWN CENTRE.

Objectors

<i>Objection 260</i>	<i>GOSE (CW)</i>
<i>Objection 545</i>	<i>Prudential Portfolio Managers</i>
<i>Objection 678</i>	<i>Rank Leisure Division</i>
<i>Objection 943</i>	<i>Guildford Environmental Forum (CW)</i>
<i>Objection 1035</i>	<i>MEPC</i>
<i>Objection 1074</i>	<i>Sainsbury's Supermarkets Ltd (CW)</i>
<i>Objection 1214</i>	<i>Tesco Stores Ltd</i>
<i>Objection 1262</i>	<i>Guildford Chamber of Commerce</i>
<i>Objection 1383</i>	<i>Guildford Business Forum</i>
<i>Objection 1939,1945</i>	<i>East Horsley Parish Council</i>
<i>Objection 1977</i>	<i>Mr J W Bannister</i>
<i>Objection 2024</i>	<i>Seale and Sands Parish Council</i>
<i>Objection C271</i>	<i>University of Surrey</i>

Background, Objections and Issues

7.4.19. The Policy indicated that in Guildford Town Centre parking provision for all non-residential development will be replaced by commuted payments which will be used as contributions to Park and Ride and other movement initiatives. Very limited operational parking may be allowed, but permission will not be given for additional long stay car parks in the Town Centre. The reasoned justification included a figure of £3500 per space to be provided in lieu of off street parking, the figure current at the time of deposit for the cost of providing a Park and Ride parking space. The adopted car parking standards for the Town Centre (Appendix 1) would form the basis for assessing the number of spaces that would need to be funded. Residential development would still be expected to make on-site provision in accordance with the standards.

7.4.20. The justification of the Policy was that a firm restraint on long-stay car parking in the Town Centre was necessary, because of the constraints on highway capacity and the objective of the Plan to restrain the growth or reduce the use of the private car for journeys to the Town Centre, particularly at peak times, and to encourage viable alternative means of access.

7.4.21. Objectors in many instances considered that the approach could only lead to damage to the retail functioning of the Town Centre, discouraging redevelopment, handicapping food stores where convenient car access was essential and the parking short-term, while encouraging non-residential development to seek sites outside the Town Centre. More fundamentally, the Policy was not following the advice of PPG13 either in the way that car parking provision for developments was being approached, or in requiring commuted payments in place of on-site provision. At the time of deposit the County Council had not completed its comprehensive review of parking policy and standards across the County and this, too, was pointed out.

7.4.22. The Council accepted that the approach was inconsistent with National policy on the use of commuted payments. In addition, the County Council had completed the review of parking policy and standards. Appendix 1 was proposed to be changed to include the new standards. Policy 99G1(1) and Policy 99G3, in a revised form, will cover the provision of parking space in the Town Centre and the use of planning obligations as a means of seeking contributions to Park and Ride and other transport improvements. Policy 99M4 was proposed to deal with long-stay parking in Guildford Town Centre, retaining only the final sub-paragraph of the original Policy, the indication that planning permission will not be given for additional long stay car parks (PC229).

7.4.23. The issues remaining were whether the Policy was consistent with the maintenance of the viability and vitality of the Town Centre as a retailing and general business centre.

Consideration

7.4.24. The implications of the changes proposed to this Policy were largely considered in relation to Policy 99G1(1), which takes over much of its role. The changes proposed would meet the Objections to a lack of consistency with PPG13 and other advice on the use of planning obligations, a further matter which was considered in relation to the General Policies. However, a matter that remained was whether in seeking to restrict the parking provided for developments in the Town Centre to nothing or a mere fraction of the standards something important was being overlooked.

7.4.25. The representations by Tesco Stores and Sainsbury's, and some other Objectors, pointed to the need for major food stores to provide short term parking for their customers. There were Objections to the lowered standards for these stores in the new County Council standards, but in the Town Centre these would be further reduced. PPG6 is looking to site developments such as these in or adjacent to the main shopping areas and not as has been often the case in the past in out of town locations. Policy 99S1 emphasises this approach to store location.

7.4.26. I noted the complaint that the County Council's revised standards for car parking had not been prepared with full consultation of all those who would be affected, notably the major retailers. I was, nevertheless, satisfied that they had the support of current Government thinking, particularly in so far as this can be judged from documents such as the draft of the new version of PPG13. I also noted the advice of the current version of PPG13,

Section 4, recognises that the availability of car parking has a major influence on the choice of means of transport. It is accepted, among other things, that parking may be necessary for a development to proceed without causing traffic problems, but local authorities should adopt reduced requirements for locations with good access by other means than the car and keep parking requirements to the operational minimum. Local authorities are asked also to consider if it would be more appropriate to meet access requirements to sites by seeking contributions to measures to assist public transport, etc., instead of funding parking.

7.4.27. Paragraph 4.4 indicates that the parking standards for the Town Centre will be reduced to between 0% and 25% of the levels given in the revised Appendix 1. The Council will be seeking contributions from developers to provide improvements to public transport, Park and Ride, walking and cycling, Paragraph 4.4 giving an indication that the Council, with the County Council, will be preparing guidance on the nature and scope of contributions which will be sought. It can be assumed that the mechanism will be that of the revised Policy 99G3 and follow National advice. In general terms, therefore, the approach of the Plan to parking in the Town Centre of Guildford is in broad conformity with the advice.

7.4.28. The changes to the Policy remove short-stay parking from the scope of the Policy. At other places in the Plan it is stressed that the preservation of short term shoppers parking is an objective. The parking being referred to by the Objectors is short term shoppers parking, often available for use beyond the store concerned, but in terms of the Plan it would appear to be counted as long term parking, being provided to a standard in Appendix 1. The Council said that a policy of restricting parking in Town Centre retail developments had been in place for some years and had caused no apparent ill effects.

7.4.29. Objectors suggested that it would be more appropriate for this Policy to refer to commuter parking. I did not see that that would overcome the particular problem. That lay more with Policy 99G1(1) and Paragraph 4.4, which stated the intention to restrict on-site parking to between 0% and 25% of the standards of Appendix 1. That Paragraph also said that this approach had to be developed further in consultation with the County Council. Rather than suggest changes to the wording of either Policy, or the reasoned justification, at this stage, it appeared to me that a part of that development of the policy should be to look at particular or special cases. Those might, principally, be uses such as the larger food stores, where a level between 25% and 100% might be appropriate and remain within the objectives of the Policy. I suggest that flexibility be built in that would allow the accessibility needs and opportunities, including short-stay parking, of such proposals to be assessed individually.

CHAPTER 7. RECOMMENDATION 7.

7.4.5. That PC229 be made.

7.4.6. That in the development of the parking policy for the Town Centre sufficient flexibility be introduced to allow the short-stay parking requirements of individual developments to be assessed and appropriate provision made.

POLICY 99M5. PARK AND RIDE SITES

Objectors

<i>Objection 309</i>	<i>GOSE</i>
<i>Objection 368</i>	<i>University of Surrey</i>
<i>Objection 451</i>	<i>Highways Agency (CW)</i>
<i>Objection 945</i>	<i>Guildford Environmental Forum</i>
<i>Objection 1263</i>	<i>Guildford Chamber of Commerce</i>
<i>Objection 1384</i>	<i>Guildford Business Forum</i>
<i>Objection 1448</i>	<i>West Horsley Parish Council (CW)</i>
<i>Objection 1880</i>	<i>CPRE Surrey</i>
<i>Objection 1940</i>	<i>East Horsley Parish Council</i>
<i>Objections 1986-8</i>	<i>Mr J Bannister</i>

Background, Objections and Issues

7.4.30. The development of further Park and Ride sites is an important part of the movement policy of the Plan. The Plan proposes no new sites and it is likely that those that do come forward henceforth the Council will seek to finance largely if not wholly by developer contributions. The Policy sets out the criteria to be met when further sites come to be approved.

7.4.31. There was a lot of support for the Policy. The Objections asked that proposed Park and Ride sites be identified in the Plan, pointed to various siting requirements, including a tie in with railway services, and to additional criteria, or operating needs. Some Objectors questioned the success of Park and Ride, particularly in reducing congestion in Guildford Town Centre, its impact on through traffic being negligible. The issues were thus various, but relating to the effectiveness and expression of the Policy.

Consideration

7.4.32. I accepted that if it were possible to do so the Plan should identify any new Park and Ride sites likely to be developed in the Plan period. Paragraph 7.33 indicates that the Council and the County Council have identified potential locations. However, I appreciated that while there were some sites that were being considered, there were none that had reached a stage of certainty that they could be properly shown in the Plan. The reasoned justification indicates that for further sites it may be necessary to look the Green Belt and the situation of Guildford would seem to make that a likelihood. While accepting that the Council did not see this as a preferred option, I did not see that the Plan could avoid mentioning what may well be inevitable if the policy is to be developed.

7.4.33. It is perhaps inevitable that a system designed to reduce traffic visiting the Town Centre will not do much to reduce through traffic. The problems that arise in this respect from the geographical position of Guildford have been mentioned earlier. As a contributor to the reduction of overall congestion Park and Ride has to be seen as of great potential value. Linking Park and Ride in one way or another with the railway system was,

I was told, being investigated with the County Council and the railway operators. The present system is bus-served and until the investigation of incorporating railway services has reached some conclusions it would seem best not mentioned specifically in the Plan. This and some other aspects of the operation of the Park and Ride car parks and linking services were not so much for the Plan as the management of the system, or the Local Transport Plan.

7.4.34. Being unable to identify specific sites the Policy takes a positive stance to new sites and sets out the criteria that should be met. I saw it as a necessary Policy for the Plan to contain. The criteria are in many instances in reinforcement of the General Policies, which would cover such matters as the traffic impact of a proposed site and many matters of design. I consider that it is useful to include mention of these matters in this Policy although they may be covered elsewhere, as a check list of matters that are of importance. I did not consider that it was necessary to suggest changes to this Policy.

5. PUBLIC TRANSPORT

7.5.1. The Section contained a brief introduction, largely descriptive and historical, and two Policies, relating to the provision for buses and the improvement of the rail network. There were a number of Objections to the introductory paragraphs and to the Policies themselves.

PARAGRAPHS 7.42 - 7.46.

Objectors

<i>Objection 830</i>	<i>The Guildford Society</i>
<i>Objections 946,948</i>	<i>Guildford Environmental Forum</i>
<i>Objection 1553</i>	<i>St Martha Parish Council</i>
<i>Objection 1991</i>	<i>Mr J W Bannister</i>

Objections and Issues

7.5.2. Paragraph 7.42 referred to the New Transport Plan for Surrey and the target of increasing the proportion of journeys to work in the County by bus and train from 12% in 1991 to 15% by 2011. Objectors considered that the target should be one for Guildford rather than the County, relate to all journeys, not just journeys to work, and be substantially higher than 15%.

Consideration

7.5.3. The figures quoted in the Plan come from a particular document and, while this may be overtaken by the Local Transport Plan, the Provisional Local Transport Plan contains the same targets. At this time there is not sufficient detail in these documents to allow a break down to provide figures for Guildford. In future, as the Local Transport Plan is developed this may be possible, as may be the setting of targets for bus use for all journeys. These could be included in the Plan at future revisions, but I would not advocate

the adoption of targets that do not have a sound basis and which can not be achieved with reasonable certainty.

7.5.4. Paragraph 7.46 refers to coach parking, and to the identification of suitable sites. New Park and Ride sites will be expected to cater for visitor coach parking. Guildford Environmental Forum did not think this went far enough, seeing a potential for coaches to run shopping and leisure trips to the town, giving rise to a need to provide facilities for coach drivers. If sites had been identified it would be appropriate to include them in the Plan, but this seemed not to be the case. I did not see it as necessary to go beyond what is said in Policy 99M5 and this Paragraph

7.5.5. The Council proposed a correction to Paragraph 7.45, changing the figure shown in parentheses from 7.1 to 9.1 (PC76).

CHAPTER 7. RECOMMENDATION 8.

7.5.1. That PC76 be made.

POLICY 99M6. PROVISION FOR BUSES

Objectors

<i>Objection 310</i>	<i>GOSE (CW)</i>
<i>Objection 950</i>	<i>Guildford Environmental Forum (CW)</i>
<i>Objection 1881</i>	<i>CPRE Surrey (CW)</i>
<i>Objection 1978,1990</i>	<i>Mr J W Bannister</i>

Background, Objections and Issues

7.5.6. GOSE drew attention to a requirement of PPG13, paragraph 4.26, that proposals maps should indicate where buses will be given priority and the measures that will support this. The PPG also asks that accessibility profiles for public transport should be established to identify sites that could meet the policy objectives. The Policy as included in the Plan was not thought to go beyond a statement of intent.

7.5.7. Mr Bannister thought that bus services should be subsidised, setting this against the cost of adverse traffic impacts on the town. Other Objectors asked for changes to Paragraph 7.47 to give greater emphasis to bus priority.

Consideration

7.5.8. As to the points made by GOSE, the Local Transport Plan may now be a better medium for conveying measures for bus priority, this Policy being concerned with new development more than management of the highway. The Council said that detailed accessibility profiles were being developed with the County Council for use in assessing new development proposals and proposed including reference to them and to bus priority vis a vis

the Local Transport Plan in the reasoned justification (PC76). These changes appeared to satisfy GOSE and I saw no need for redirection of the Policy to take in bus priority in general, or that other additions were necessary.

7.5.9. Mr Bannister may have had a good point, but the subsidisation of bus services is not strictly a matter for the Plan. He also pointed out that the reference to figure 7.1 in Paragraph 7.45 was wrong (corrected to 9.1 by PC76) and asked that the small plan in the figure show the relationship of the bus station with the railway station. In so far as the development permitted at St Dominic Square includes the replacement bus station, referred to in Paragraph 7.45, there would be logic to that. The small size of the figure, and the purpose of its inclusion - to show the site of the development permitted, it not being a proposal of the Plan, argues against that, however. The relationship between the site and the station are readily discernible from the Proposals Map.

7.5.10. The Guildford Environmental Forum suggested a change to the last sentence of Paragraph 7.47 (as deposited) which the Council accepted (PC77).

CHAPTER 7. RECOMMENDATION 9.

7.5.2. That PC76 be made (see also Recommendation 7.5.1)

7.5.3. That PC77 be made.

POLICY 99M7. RAIL NETWORK

Objectors

<i>Objection 45</i>	<i>Ash Green Residents Association</i>
<i>Objection 313</i>	<i>GOSE</i>
<i>Objection 422</i>	<i>Royal Surrey County Hospital</i>
<i>Objection 831</i>	<i>The Guildford Society</i>
<i>Objection 951</i>	<i>Guildford Environmental Forum</i>
<i>Objections 1033/4</i>	<i>MEPC (CW)</i>
<i>Objection 1247</i>	<i>Ash Parish Council</i>
<i>Objection 1554</i>	<i>St Martha Parish Council</i>
<i>Objection 1882</i>	<i>CPRE</i>
<i>Objection 1928</i>	<i>Mrs R Thomas</i>
<i>Objection 2026</i>	<i>Seal and Sands Parish Council</i>

Background, Objections and Issues

7.5.11. The Policy indicates that the Council will support and where necessary grant planning permission for improvements to the railway infrastructure, including new stations. The supporting Paragraph, 7.48, refers to studies undertaken by the County Council showing new stations to be feasible at Park Barn and Merrow Depot.

7.5.12. GOSE criticised the Policy for being only a statement of intent, rather than a positive policy for the provision of new railway stations. Other Objectors asked for the new station at Park Barn to be a proposal of the Plan, the site being convenient for the Royal Surrey County Hospital, the Tesco superstore and the Surrey Research Park. Some Objectors saw a need to promote stations as interchanges, including the provision of car parking and incorporation in the policies for Park and Ride. Other proponents of Park Barn saw no need for more than a halt. Mrs Thomas saw such a station as only adding to traffic and parking problems in its vicinity.

Consideration

7.5.13. The Plan area is fortunate in being served by five railway lines converging on Guildford and a further line through Ash Vale to Aldershot. All run relatively frequent services, particularly at peak times, into Guildford, to London and to other major centres in the region. While the network is strongly radial and may thus not serve many cross country journeys, as well as being inconvenient for those distant from stations, the railways provide an opportunity to develop public transport which the Plan should recognise and as far as possible exploit.

7.5.14. The Local Transport Plan will include the Surrey Rail Strategy in which will be much of the policy for improving services and facilities in the short and the longer term. It, too, mentions the detailed studies for the provision of railway stations at Park Barn and Merrow. I accept that Railtrack has not so far agreed to the provision of either of these stations. There would no doubt be financial and operating matters to consider, although the Railtrack response to this Policy was essentially of support. Apart from the new stations, much of the work of improving the infrastructure of the railway network will not require planning permission to be specifically granted. While the Plan can encourage provision, to allocate land and include the stations as proposals of the Plan would not be appropriate. I did not consider that the Policy should be removed and saw it as going as far as was possible at this time.

7.5.15. The promotion of stations as Park and Ride sites it was said was being encouraged. The County Council was in discussions with the train operators, which could include enlarging car parks at some stations and other improvements. Again it did not seem possible to actually identify locations where this might be undertaken as yet. In these instances, as well as in the provision of new stations, the General Policies of the Plan would have regard to traffic, environmental and amenity considerations.

7.5.16. I agreed that the interchange functions of stations with other means of public transport should be given greater emphasis. The Council proposed additions to the title of the Policy, the Policy itself and the reasoned justification to take this in (PC78 and PC79). It was also proposed to add a further sentence to the reasoned justification to take account of access for those with disabilities and the improvement of existing station parking (PC78).

CHAPTER 7. RECOMMENDATION 10.

7.5.4. That PC78 be made.

7.5.5 That PC79 be made.

6. CYCLISTS AND PEDESTRIANS

POLICY 99M8. PROVISION FOR CYCLISTS AND PEDESTRIANS

(a) Objections to the principle and wording of the Policy

Objectors

<i>Objection 314</i>	<i>GOSE</i>
<i>Objection 408</i>	<i>Guildford Cycling Group</i>
<i>Objection 551</i>	<i>Onslow Village Residents Association</i>
<i>Objection 703</i>	<i>West Clandon Parish Council</i>
<i>Objections 832/4</i>	<i>The Guildford Society</i>
<i>Objections 939,955/60</i>	<i>Guildford Environmental Forum</i>
<i>Objection 1227</i>	<i>McCarthy and Stone (Developments) Ltd</i>
<i>Objection 1367</i>	<i>Effingham Parish Council</i>
<i>Objection 1799</i>	<i>Mr A E Rees</i>
<i>Objection 1883</i>	<i>CPRE Surrey</i>
<i>Objection 1941</i>	<i>East Horsley Parish Council</i>
<i>Objections 1979/83</i>	<i>Mr J Bannister</i>
<i>Objection C39</i>	<i>Horsley Countryside Preservation Society</i>

Objections and Issues

7.6.1. The Section contains an introduction and a single Policy, Policy 99M8, which deals with both cycle and pedestrian routes and facilities. Most Objections related to one or the other, although some were more general, or referred to the problems of combining the two.

7.6.2. At deposit the Plan did not contain an indication of proposed cycle routes, but in the intervening period a cycling strategy had been agreed by the Council and by PC80 it was proposed to change the Policy to reflect this and to include an indication of the routes proposed. There were in consequence Objections to the Policy in its original form, in which the absence of an indication of routes was a major criticism, and in its proposed new form, in which there were Objections to some of the routes.

7.6.3. Other Objections referred to the problems of cyclists and pedestrians sharing routes and the relatively low proportion of the population which would be likely to make use of cycle routes, the parking standards for cycles proposed in the (changed) Appendix 1 and the absence of proposals for some pedestrian routes in Guildford Town Centre. There was also the suggestion that in Paragraph 7.49 the target for increasing walking and cycling should be expressed for Guildford rather than the County. However, desirable though this is, and something to take into account in the future, the New Transport Plan proposed by Surrey County Council does not break the targets into smaller areas and for the time being

this is the best that can be done. The main issues related to the appropriateness of the Policy and its form and expression and to the more detailed matters referred to above.

Consideration

7.6.4. As mentioned earlier, a number of Objectors commented on the absence of proposals for cycle routes in the Plan. GOSE, in addition, commented that the second paragraph of the Policy, concerning pedestrian routes in connection with major new developments, was unduly restrictive. Others commented on the wording as not going far enough to secure new strategic routes, access and parking for cycles.

7.6.5. My feeling was that now a network of cycle routes has been identified it would be preferable to look again at the Policy, to ensure that it is promoting and safeguarding these routes, as well as linking in major new development that would generate cycle traffic. To that end, it would be as well to confine this Policy to cycling interests. The first paragraph of the Policy would be more appropriate as a part of the reasoned justification, while Paragraph 7.53 could form part of the Policy. Although it was suggested, I did not see the second paragraph of the Policy as very close to policy 6.4.4 of "Better Local Plans", even to the final paragraph of that example.

7.6.6. The following is an indication of the way the Policy might be worded:-

The Proposals Map shows specific routes along which the Council will undertake or promote measures to encourage cycling, including improvements to the safety and convenience of the routes, the designation of cycle lanes, signposting and the provision of cycle parking facilities.

Major travel generating development, including residential developments, will be expected to make provision for cyclists and link with existing and planned routes. All new developments will be expected to make provision for cycle parking in accordance with the standards set out in Appendix 1.

Major new development will not be permitted where it interrupts established or proposed cycle routes.

7.6.7. If it is thought necessary to have a pedestrian priority policy, it would be best related to identifiable locations or routes, but I could readily identify none that was proposed, as opposed to already in existence, although there were suggestions from Objectors. A general policy could, however, be on the lines of:-

Permission will not be granted that would prejudice established or proposed pedestrian routes or pedestrian priority schemes.

7.6.8. Cycling is likely to be a mode of transport that will appeal mainly to younger people, but it is an alternative to the use of the car and recognised as such in the advice. It is also a recreation enjoyed by many and cycle routes can serve in both capacities. The Plan cannot, in my view, be faulted for identifying and developing cycling facilities. The absence

of some routes, such as a cycle route to Effingham station was commented upon. The Council's response was that this and other routes will be examined as the strategy develops. Waverley Borough Council pointed to the need for the network of cycle routes to connect with cycle routes in adjoining Districts. The plan within the Strategy document indicated connections across the Borough boundary and I assumed this had been among the principles on which the strategy had been drawn up.

7.6.9. PC80 indicated that the provision of the routes not already available would be phased. Routes are shown as "Existing, Proposed routes (this year) and Proposed routes (next five years)". That did not appear to relate too closely to the Strategy, which showed the third category of routes as "desired lines (facility not yet determined)". It may be that the Plan should show only one category of proposed routes rather than two. Certainly there should be an explanation in the Plan of what the timing indication means.

7.6.10. As with many things the devil of a Policy such as this is in the detail. Many parts of the routes are on highways or use footpaths. Mixing cyclists with other road users has its hazards, as does mixing cyclists with pedestrians. Objectors specified some of these problem areas, but I had no doubt that they were familiar to the Council and would be taken into account when the proposals were implemented. It can be appreciated that implementation will involve both the Council and the County Council, and may look towards the Local Transport Plan for funding, but I did not see this as a problem that affected the basic policy of the Plan.

7.6.11. The revision of Appendix 1 introduced the County Council's revised standards for cycle parking. McCarthy and Stone objected that in their developments for the elderly the provision of cycle parking was not an appropriate requirement. I accepted the Council's view, however, that while residents might generate little demand, that was not necessarily so for staff and visitors. The developments were accorded a lower car parking standard than other residential developments and it did not seem unreasonable to ask for the not particularly onerous cycle parking standard to be met.

7.6.12. As well as cycle routes, a number of Objectors were interested in particular pedestrian routes. These included an access from Guildford station to the Friary Centre and the Town Centre. This the Council accepted to be a high priority, although currently there were no proposals. The pedestrianisation of Quarry Street was not something that could be contemplated at present, because of the disruption to traffic it would cause. I did not see that I could ask for these proposals to be added to the Plan without firm proposals for bringing them about.

(b) Objections to cycle routes in East and West Horsley

Objectors

<i>Objection C21</i>	<i>Mr & Mrs D A Harris</i>
<i>Objection C26</i>	<i>Lynx Hill Residents Association</i>
<i>Objection C44</i>	<i>Mr R K Hollis</i>
<i>Objection C45</i>	<i>SRS Action Group</i>

Objection C48

Objection C52

Objection C54

Objection C56

Objection C222

Mr G P W Newman

Ms S Lillywhite

Mr G Bowsher

Pennymead Drive Association Ltd

Mr I Robinson

Consideration

7.6.13. A number of the points raised by the Objectors were considered above, but their principal concern was the inclusion of Lynx Hill and Pennymead Drive among the proposed cycle routes. Lynx Hill is a relatively narrow and secluded residential road linking Ockham Road with bridleways which link East Horsley through woods and countryside to Orestan Lane and Effingham to the east. Lynx Hill is a private road, but also a foot and bridle path. Pennymead Drive is similar, also a private road, without, it seemed, a public right of way, the link to Ockham Road being a footpath.

7.6.14. PC80 showed a route for the cycle way from West Horsley via the Street and East Lane to Ockham Road. Pennymead Drive and Lynx Hill were both shown as future routes to link with the route to Effingham. The route from West Horsley and that using Pennymead Drive were subsequently deleted by PC80. The western part of that route had been seen as a means of serving the School in West Horsley. The eastern part appeared to be largely recreational, although there was a value in the route for the link it would provide between East Horsley and Effingham.

7.6.15. The Lynx Hill Residents Association was represented at the Inquiry and was supportive of the provision of cycle routes in general, and accepted that Lynx Hill was used in an unintensive way already by cyclists. Their concerns now, as other Objectors, were that a development of the route to give much greater use would be damaging to the character and the amenity enjoyed by the residents of this quiet and secluded residential road. The necessity to use Lynx Hill had been increased by the deletion of the Pennymead Drive route - because it was a private road - although the route as a whole had been depreciated by the deletion of the length from West Horsley and the failure, so far, to identify an alternative.

7.6.16. There were safety concerns in the difficult junction of Lynx Hill with Ockham Road, other cross roads on the route and the narrowness and speed humps in Lynx Hill itself. The secluded nature of the bridleway to Effingham, particularly through Orestan Wood, was also a concern.

7.6.17. The introduction of the proposals as a Pre-Inquiry Change to the Plan I appreciated had not allowed the same opportunities for public comment that there had been for the Plan as deposited. However, I was told that the Cycle Strategy had been publicised and consulted upon, Parish Councils having been involved. More significantly, perhaps, it was said that the Council would consult local people and organisations as to the details of schemes before they were implemented. Whether there might be legal impediments to the use of parts of the route, such as Lynx Hill, had not been investigated and it was accepted by the Council that these could preclude use of a particular route.

7.6.18. It was also accepted by the Council that while there might be need to improve unpaved stretches, generally all that was proposed in roads such as Lynx Hill was modest changes to signing to indicate the route. It was not anticipated that there would be a cycle track indicated on the road surface in locations such as this. It was recognised that, in general, marking out cycle tracks would not always be practical on the narrower rural roads. The Residents Association was prepared to accept that the strength of their objection was related to the likely use that would be made of the route. A modest increase in the present use would probably not be a problem. Frequent use by, for example, cycling clubs, or for competitions would be a different matter.

7.6.19. It was not unreasonably pointed out that the whole object of the proposal was to increase the use of the route by cyclists. If that use were to become intrusive, I could accept that the residents would feel that their quiet enjoyment of a pleasant and largely traffic free environment had been disturbed. The route between East Horsley and Effingham is a valuable one in the cycle network, and despite the misgivings of local people as to its safety, and at present its passibility, I felt it should be retained. At the same time, I considered that the route from Ridings Wood to Ockham Road needed closer consideration, if possible to avoid to great an intrusion into the residential area.

7.6.20. Noting that detailed consultation has yet to be carried out on a route that is not denoted in the strategy for immediate implementation I would see it as appropriate to remove the length shown to pass along Lynx Hill together with that in Pennymead Drive. To provide reassurance to people who could be affected by the routes it would, I consider, be advisable to add to the reasoned justification paragraph 1.7 of the Guildford Borough Cycling Strategy:-

"In pursuing the Strategy the Council will work in partnership with Surrey County Council, Parish Councils, the Surrey Police, resident's groups, local businesses and relevant organisations such as the Guildford Cycling Liaison Group and cycling clubs."

(c) Cycle route proposed across Manor Farm

Objector

Objection 1478

Mr R Stephens

Objection C252

University of Surrey

7.6.21. Mr Stephens was concerned to provide a cycle route from the west of Guildford. The cycle strategy included such a route across Manor Farm. The University noted that the land that would be involved is the subject of a Proposals of the Plan to remove land at Manor Farm from the Green Belt and to permit its development for the purposes of the University. The provision of a cycle route was supported, but, pending the production of a detailed planning brief and a master plan the indication of a specific route was considered premature and possibly prejudicial to the best use of the land.

7.6.22. I can appreciate and even support the Objectors' view that the Plan should not contain proposals that could be prejudicial to the University's longer term use of the land at

Manor Farm. However, the proposed route could provide a valuable link between the built up areas separated by Manor Farm, as well as part of a longer distance route. It appeared to follow existing roads and tracks and to be feasible as an interim if not the permanent route. My view was that, accepting that in the longer term as the University's plans mature and are developed - and they were said to stretch over at least twenty years - this route might be affected, the advantage lay in seeking to provide a route across Manor Farm now. Accordingly, I am not suggesting that this part of the cycle routes be omitted.

CHAPTER 7. RECOMMENDATION 11.

7.6.1. That PC80 be made, in so far as it relates to the inclusion of the routes of the Guildford Borough Cycling Strategy on the Proposals Map, subject to the exclusion from the identified routes of:-

- (a) Pennymead Drive, East Horsley and The Street/East Lane, West Horsley, and
- (b) Lynx Hill, East Horsley.

7.6.2. That further consideration be given to showing on the Proposals Map one rather than two phases of implementation of proposed cycle routes.

7.6.3. That Policy 99M8 be reworded as follows:-

THE PROPOSALS MAP SHOWS SPECIFIC ROUTES ALONG WHICH THE COUNCIL WILL UNDERTAKE OR PROMOTE MEASURES TO ENCOURAGE CYCLING, INCLUDING IMPROVEMENTS TO THE SAFETY AND CONVENIENCE OF THE ROUTES, THE DESIGNATION OF CYCLE LANES, SIGNPOSTING AND THE PROVISION OF CYCLE PARKING FACILITIES.

MAJOR TRAVEL GENERATING DEVELOPMENT, INCLUDING RESIDENTIAL DEVELOPMENTS, WILL BE EXPECTED TO MAKE PROVISION FOR CYCLISTS AND LINK WITH EXISTING AND PLANNED ROUTES. ALL NEW DEVELOPMENTS WILL BE EXPECTED TO MAKE PROVISION FOR CYCLE PARKING IN ACCORDANCE WITH THE STANDARDS SET OUT IN APPENDIX 1.

MAJOR NEW DEVELOPMENT WILL NOT BE PERMITTED WHERE IT INTERRUPTS ESTABLISHED OR PROPOSED CYCLE ROUTES.

7.6.4. That, if it is considered to be required, the following Policy be added to the Plan:-

PERMISSION WILL NOT BE GRANTED THAT WOULD PREJUDICE ESTABLISHED OR PROPOSED PEDESTRIAN ROUTES OR PEDESTRIAN PRIORITY SCHEMES.

- 7.6.5. That the reasoned justification be reworded to include the first paragraph of the present Policy, paragraph 1.7 of the Guildford Borough Cycling Strategy, PC69 and PC80 and an indication of the meaning and purpose of the phasing shown, as appropriate.

7. GUILDFORD - CRANLEIGH MOVEMENT CORRIDOR

POLICY 99M9. GUILDFORD TO CRANLEIGH MOVEMENT CORRIDOR

Objector

Objection 961

Guildford Environmental Forum

7.7.1. The Policy seeks only to protect the route of the former Guildford to Cranleigh railway as a movement corridor. The former route is now a footpath, cycleway and bridleway, part of the Downs Link. The Plan says that a feasibility study for the reopening the route as a railway showed it was unlikely to be financially feasible, but the Plan is seeking to protect the route for its present purposes.

7.7.2. The Respondents, although supporting the Plan, saw an implication that the reinstatement of the railway would never be a practical proposition. However, the thrust of policy in favour of public transport and the need to develop the capacity and route choices available for public transport could in future change the balance in favour of the reinstatement of the railway. A further possibility that could change the financial outlook for the railway would be to relate a park and ride scheme to the line.

7.7.3. I consider that the Forum is right to take this longer term view of the possibilities, but the Plan does no more than state the present position, while safeguarding the route. The Policy is not incompatible with the development of the route for a railway, tramway, bus only route or other public transport use, if the opportunity arose, but not being propositions for the Plan period the Plan is correct not to make proposals for which there are currently no foundation.

CHAPTER 8. SHOPPING

1. INTRODUCTION

8.1.1. The opening Section of the Chapter attracted no specific Objections. It was largely descriptive, particularly in relation to Guildford Town Centre, described as the principal shopping centre in Surrey as well as the focus of retail activity in the Plan area. The aim of protecting the vitality and viability of shopping is stated. The Chapter covers all of the A Class uses of the 1987 Use Classes Order (as amended), which include as well as shops (Class A1), Class A2, financial and professional services and Class A3, food and drink establishments. The Order permitted some flexibility in changes of use between the different "A" Classes.

2. PLANNING POLICY GUIDANCE AND THE 1994 SURREY STRUCTURE PLAN

Objector

Objection 1036

MEPC (CW)

8.2.1. The Section gave a brief resume of the advice of PPG6, which promoted use of a sequential approach, whereby the first preference for major retail development was town centre sites or buildings, followed by edge of centre sites and, failing these locations, out of centre sites, but only where they are accessible by a choice of means of transport. The Objector drew attention to a Parliamentary Answer by Richard Caborn which suggested four key tests for the assessment of new development, of which the sequential approach as to location was one. The Council proposed a change to Paragraph 8.6 to bring this in (PC81).

CHAPTER 8. RECOMMENDATION 1.

8.2.1. That PC81 be made.

3. EXISTING RETAIL FLOORSPACE

Objector

Objection 838

The Guildford Society

8.3.1. This and other Objections by the Society to the opening Sections of the Chapter are considered below.

4. ADDITIONAL PROVISION AND FUTURE TRENDS

8.4.1. There were no Objections relating to this Section.

5. OBJECTIVES

Objectors

<i>Objections 837-9</i>	<i>The Guildford Society</i>
<i>Objection 1264</i>	<i>Guildford Chamber of Commerce</i>
<i>Objection 1385</i>	<i>Guildford Business Forum</i>
<i>Objection 1655</i>	<i>Country Landowners Association</i>
<i>Objection 1814</i>	<i>ARP 050</i>

Objections and Issues

8.5.1. Three main matters were raised in the Objections:-

- (a) The impact of Class A3 uses (food and drink establishments) in Guildford Town Centre,
- (b) The consistency of the objective seeking to protect the vitality and viability of Guildford Town Centre with the proposed approach to parking, and
- (c) The inclusion of rural dwellers in the provision of convenient retail facilities.

The main issues were whether the Plan was making sufficient recognition of these matters.

Consideration

8.5.2. The impact of Class A3 uses in Guildford Town Centre was the subject of several of the Objections of the Guildford Society. It was suggested that the significant increase in such uses that had taken place in recent years had been the most significant change to take place in the Town Centre. The floor space now so occupied, or subject to unimplemented permissions, should be recorded in Section 3 and an inventory maintained to provide a reference point for future policy. It would also be prudent to define what would be considered a "major" A3 development. 1000sqm might be an appropriate figure, although one capable of accommodating a specified number of customers might be a more useful definition.

8.5.3. The concentration of such uses, for example in Bridge Street, has had ramifications in public order and amenity terms, but also in terms of public transport needs. It is fundamental to the operation of the Town Centre that this changing element of Town Centre use is recognised if its needs are to be met. Appendix 2, Changes of Use in Guildford Town Centre, defined only the Secondary, Tertiary and Specialist Shopping Frontages, relative to Policies 99S5-7. These Policies are specific about Class A3 uses, but Bridge Street is not among these frontages. Areas outside the scope of Policies 99S4-7 have no specific Policy attached to them. The Society considered that the Appendix should list areas in which major A3 uses are located and the outstanding permissions. It was also suggested that there be a specific Policy added to the Plan to the effect that locating two large Class A3 uses adjacent to each other would be subject to careful assessment as to their environmental and other impacts.

8.5.4. In this Section it was considered that there should be an additional objective:-

"To effect a pause in future permissions for large licensed establishments in the Town Centre until the outcome of the present new premises is assessed."

8.5.5. The Council had undertaken studies for an Interim Policy Statement - Changes of Use in Guildford Town Centre - largely as a result of the growth of Class A3 uses. This later formed the basis of the Policies of this Chapter. A result of this work was the identification of Bridge Street and Chapel Street as suitable locations for food and drink premises. In the identified shopping frontages the Policies imposed varying degrees of resistance to further such uses.

8.5.6. With a policy base that was essentially up-to-date, comprehensive and recognised the concerns of the Society, there appeared to be no need to impose by objective or policy a moratorium on further A3 uses. This would in any case be contrary to the advice and arguably not in the best interest of the Town Centre, where the dynamics of retailing have to be accommodated and an approach which will sometimes accommodate quite rapid adjustments is necessary. I could accept that where changes are taking place it is valuable to know the base level, the extent of the change and what further change may be expected, but not necessarily to include them in the Plan. Monitoring of basic situations and the effect of the policies of the Plan is necessary and this would be one area in which it could be expected to take place. If the need arose, monitoring would provide the basis for the change or adjustment of policy.

8.5.7. That changes or concentrations of particular activities can have negative impacts on amenity or "atmosphere" is recognised in PPG6. There is a need to balance activities which provide "life" to the centre in the evenings with the retail function and other objectives, such as providing a mix of leisure and recreational uses to suit most sections of the community and retaining or increasing the residential content of the Town Centre. The Town Centre has in this respect been remarkably successful, if there are some points of friction. In so far as land use policies can have a bearing, it appeared to me those proposed in the Plan would offer a good chance of being successful.

8.5.8. It appeared that the concentrations of Class A3 uses now existing in the Town Centre grew under the influence of the policies of the adopted plan. That contained a policy encouraging such uses and Bridge Street was seen by the Council as a suitable location, because of its proximity to the railway station and an absence of local residential uses. Under the proposals of the Plan Class A3 uses will be subject to the criteria contained in the General Policies, and in the defined shopping frontages to the specific criteria these Policies contain. Between them they should provide a comprehensive framework for considering further proposals for Class A3 uses. I agree with the Council that a specific Policy relating to Class A3 uses, major or otherwise, is not now required.

8.5.9. The proposed approach to parking in the Town Centre was the subject of Objections considered in the previous Chapter. Accessibility to the Town Centre is recognised by the Plan as the key to its continued success. The approach to parking maintains this objective, along with parallel objectives to reduce congestion, at present a

negative factor to the future of the Centre. The changed form has been guided by Government advice and by the policies of Surrey County Council, as well as being one of the planks of the aim for sustainability. The approach is thus part of a wider, comprehensive policy for movement in the Plan area. In the Town Centre emphasis will be on the provision of short-term parking for shoppers and other visitors to the centre, and the development of means of transport other than the car, particularly public transport, in which is included Park and Ride.

8.5.10. While it is possible to have misgivings that the approach will be successful in maintaining the place of Guildford in the retail hierarchy, I consider that in view of the advice this is a necessary course, while the vigour with which it is being pursued through the Plan and the Local Transport Plan is encouraging to an optimistic view. I have supported the policy as it is expressed in the Movement Chapter and elsewhere in the Plan and have no reason to see it differently here.

8.5.11. Objective (iv) is "To provide retail facilities which are accessible to the majority of the population without increasing car trips". The Country Landowners Association wanted it qualified not to exclude those in rural areas needing retail facilities close by. The Plan Policies relate to the full range of shopping centres from Guildford Town Centre to neighbourhood shops, the latter, with the named local shopping centres, being the shops to be found in the villages as well as in suburban areas. The crucial role of village shops in maintaining villages as viable communities is recognised by both PPG6 and PPG7.

8.5.12. The advice suggests that authorities should adopt a positive approach to preserving and encouraging shops in rural areas. Although there were criticisms of Policies 99S9 and 99S10 they have in them resistance to the loss of shops and a permissive attitude to the changes often required to keep shops and smaller shopping centres viable. The supporting measures mentioned in the reasoned justification, but beyond the scope of the Plan, included a village shop rate relief scheme.

8.5.13. I noted that there was no Policy specifically encouraging the provision of new village shops, or the reopening of former shops, outside the named local shopping centres. It may be that the instances of such development is too rare to warrant a specific Policy. I concluded that the Plan (and other Council initiatives) was taking as positive and supportive a role to shops in rural areas as could be reasonably expected. With Objective (iii) in place I saw no reason to suggest an alternative wording to Objective (iv).

6. SUPPORTING MEASURES

8.6.1. There were no Objections to this Section.

7. NEW RETAIL DEVELOPMENT

POLICY 99S1. MAJOR NEW RETAIL DEVELOPMENT

(a) Policy content and wording

Objectors

<i>Objections 275,280</i>	<i>Marks and Spencer Plc (CW)</i>
<i>Objection 841</i>	<i>The Guildford Society</i>
<i>Objections 1036/7</i>	<i>MEPC (CW)</i>
<i>Objection 1075</i>	<i>Sainsbury's Supermarkets Ltd (CW)</i>
<i>Objections 1210-12, C2</i>	<i>Tesco Stores Ltd</i>
<i>Objections 1921, C49</i>	<i>Safeway Stores Plc</i>
<i>Objection C53</i>	<i>Surrey County Council</i>
<i>Objection C138</i>	<i>CPRE Surrey</i>

Background, Objections and Issues

8.7.1. The Policy is concerned with major new retail development throughout the Plan area. "Major" in this context is development providing more than 1000sqm gross of additional retail floorspace. Developments to be acceptable would need to meet two criteria, the first relating to the sequential approach mentioned above and the second to the protection of the vitality and viability of existing centres.

8.7.2. The reasoned justification indicated that with the granting of permission for the development of St Dominic Square there was no overriding need for further major retail development in the Borough during the Plan period. As deposited, only one of the major development sites designated in Guildford Town Centre included retail development.

8.7.3. A number of the Objectors saw the Policy as too negative, inflexible and its assumption that there was no need for further development unproven. In its antecedents and its deposited form it was not seen to be in conformity with the advice of PPG6. As a result, the Council proposed a number of pre-Inquiry changes to the Policy and to Paragraph 8.15. These took account of Richard Caborn's Parliamentary answer (February 1999) which was intended to clarify the guidance of PPG6 and indicated that a test of "need" was not appropriate where development was in accordance with an up to date plan strategy, or proposed on sites within an existing centre.

8.7.4. The proposed changes would remove the test of need from the opening part of the Policy, and, therefore, as a consideration for all major new development, adding a third criterion in which "need" would require to be demonstrated only for edge of centre or out of centre sites. The Policy was given a more positive ring by the removal of "will not be permitted", to be replaced by "will be expected to satisfy" in respect of the criteria. Paragraph 8.15 would be modified by making the lack of an overriding need a consideration only for the allocation of sites, the criteria providing a general standard for the assessment of proposals that might come forward.

8.7.5. The proposed changes satisfied some Objectors. CPRE asked for the original wording to be retained. Edge and out of centre retail developments were seen to be a major contributor to the decline of local and village shops. Other Objectors remained concerned that the Policy was still not fully reflecting the advice, either in the way it had been developed, a lack of research to inform what further floorspace was required, or its expression. I saw the main issue to be whether further changes were required in respect of these matters.

Consideration

8.7.6. A number of Objectors, as mentioned above, referred to the use of "need" as, in effect, one of the criteria set down by the Policy for the acceptance of further major new retail development. PC82 removed "need" as a general criterion, but added a further criterion relating to edge of centre and out of centre sites in which "need" would remain a test.

8.7.7. On behalf of Tesco Stores Ltd, it was pointed out that "need" in itself has more than one meaning that might be relevant to the situation and that the Plan should give some guidance if it was going to use the term. As was pointed out, need has been principally assessed in relation to available expenditure on goods of different sorts. The guidance, following Richard Caborn's amplification, says that the requirement to demonstrate need should not be regarded as having been fulfilled simply by showing that there is capacity in physical terms or demand in terms of available expenditure in the catchment area. The four additional sorts of need identified on behalf of the Objectors were a helpful amplification, although factors which may show need were left by the advice as a matter for the decision-maker.

8.7.8. The introduction of need, however expressed, begs the question as to whether for the purposes of the Plan there should have been an assessment of the requirement for further retail provision, as some Objectors thought. There was recognition that this could not be done at the late stage when the Plan was on deposit, but there was the suggestion that it should now be put in hand and the Plan annotated accordingly.

8.7.9. Certainly PPG6 makes assumptions as to the detail in which councils will have carried out surveys of retailing in their areas to inform the policies of their local plans. I was aware of the monitoring of retail change that is carried out, but not of any shopping surveys since the advent of the St Dominic Square development in 1995 that might give an indication of a need to consider if more land were needed for retail development. The Objections from the major food retailers suggested, if no more, that they may still see Guildford as having a potential for further convenience shopping development.

8.7.10. I accept that in an ideal world the Plan would be able to identify such unmet demands and accommodate them on appropriate sites. I suggest that the Council has this in mind in moving towards the next review of the Plan. As things stand, I consider it best to do as was suggested and say that the Council will undertake such surveys and monitoring as appears necessary to update the requirements for further development in Guildford Town Centre, or other parts of the Plan area. A few words of explanation of "need" would also

be helpful, if only as a marker that more than the traditional meaning will now be taken into account. There are suggestions for the wording in the recommendation.

8.7.11. It was asked by Surrey County Council that there should be more guidance on "cumulative impact", mentioned in the changed second criterion. It was suggested that the impact of all retail development proposals, including those which have planning permission, but have not yet been built, should be taken into account. The Council saw the concept as self-evident. As PPG6 gives a brief explanation of cumulative effects in paragraph 4.15, I do not consider that it is necessary for the Plan to include an explanation.

8.7.12. In its deposited form the opening of the Policy referred to a clear need having been identified. This would be removed by PC82. The Guildford Society, however, saw the need the Policy was to address as being that of the local resident population. Further major retail development in the Town Centre should be restricted to meet only identified needs of Borough residents.

8.7.13. The Plan gives a high priority to the needs of local residents, but the role of Guildford as a sub-regional shopping centre means that its catchment area extends beyond the Plan area. As this wider extent is necessary to support the higher order retail functions of the Town Centre, it would be potentially damaging to the long term viability of the Town Centre to seek to impose such a restriction. The Council saw things in the same way and I agree that this is not a change that should be supported. The down side of the status of the Town Centre, congestion, is being tackled in other parts of the Plan.

8.7.14. The CPRE Objected to the proposed changes in the belief that they would remove the test of need for all major shopping developments and facilitate retail developments on edge or out of centre sites. These developments were seen to have been the main cause of the loss of local shops in rural areas and in its original form in requiring a "clear need" the Policy offered an opportunity to curb such developments, protecting rural shops and thereby furthering the objective of sustainability.

8.7.15. At one level, the Policy could not be reinstated in its original form for the reasons given above. At another, the Policy is reflecting National advice which is generally discouraging to out of centre development, unless the test of need can be met. That need may well now include sustainability as well as other needs apart from the straight forward commercial need. In other Policies, and through actions of the Council beyond the Plan, efforts are made to support rural shops. In my view, with the proposed changes the Policy is going a long way to meet the Objection.

8.7.16. The definition of a major development given in Paragraph 8.15 is one providing more than 1000sqm gross of additional retail floorspace. PPG6 adopts a higher threshold of over 2500sqm. The Council said the lower figure was to reflect the particular circumstances of Guildford. Opportunities for new development are limited without risking the character and appearance that make the Town Centre attractive. There are, however, other Policies in the Plan which protect character and appearance. This Policy is seeking assessments of proposed developments against sustainability and vitality criteria applicable to developments which may by their scale have significant effects. While PPG6 does suggest

that there may be a need for such assessments for smaller developments which may have a large impact on market towns or district centres, that is not easy to show for a sub regional centre such as Guildford.

Conclusions

8.7.17. I had no great difficulty in seeing the strategy for retailing in the Plan as "planned", nor the Policy in its proposed change form as appropriate and acceptable. My suggestions for further changes relate to the reasoned justification, to make it clear that in considering proposals the advice is being followed

(b) Objections referring to the St Dominic Square development

Objectors

<i>Objection 843</i>	<i>The Guildford Society</i>
<i>Objection 1069</i>	<i>Mrs J Wakeford</i>
<i>Objection 1265</i>	<i>Guildford Chamber of Commerce</i>
<i>Objection 1386</i>	<i>Guildford Business Forum</i>
<i>Objection 1766</i>	<i>Mrs S M Smethurst</i>

Background, Objections

6.7.18. The reasoned justification mentions the granting of permission for the St Dominic Square development as removing the need to allocate sites for further major retail development in the Borough during the Plan period. The permission envisaged 17,000sqm of new floorspace, an increase of 13,000sqm on the site. The Objections asked that the Plan should consider alternatives if this scheme were not to go ahead, to omit the small shops included if they would preclude a major food store in the development and, in anticipation of an adverse effect from the development, to provide support for small shops in other parts of the Town Centre.

Consideration

8.7.19. The St Dominic Square site is shown on the Proposals Map as a Major Approved Development Site, referred to in Paragraph 9.28 of the Plan. As befits a development which I understood had received planning permission, it was not the subject of a Proposal of the Plan. The mentions of the development in the Plan are to be seen as essentially for information.

8.7.20. If the development were not to go ahead, and if there remained a potential shortage of shopping floorspace in the Town Centre that could not be met by a new scheme on this site, the question of an alternative site could arise. The Plan would operate by leaving the assessment of the opportunity to provide further shopping space and finding an appropriate site to the development industry, providing in the Plan policies of general guidance and control. In a mature centre such as Guildford, where even major new

developments such as this will represent only a relatively small part of the total shopping floor space, this would be the process to be expected.

8.7.21. As to comments on the content of the development approved, while the developer might wish to vary the scheme, it is not at this stage up to the Plan to suggest a different mix of shop sizes or types. If a major food store is not to be included there were no doubt reasons for this omission. The support of other shops that might be affected by competition from the development would not be a matter for the Plan. I have no doubt that the effect of the development on small shops in the Town Centre was among the issues considered by the Council. The promoters of the scheme made the point that there has been a shortage of larger shop units which has led to pressures to enlarge shops at the expense of the smaller units. The scheme may therefore be seen to be beneficial in removing something of this pressure. The Plan includes in the following Policies a protection for the smaller shops.

8.7.22. I noted that the approved scheme adds to the residential accommodation at present on the St Dominic Square site. The development having been granted planning permission the Plan could not now add further to the residential content of the development, as the Guildford Society suggested.

(c) Other Objections to Paragraph 8.15

Objectors

Objection 280

Marks and Spencer Plc (CW)

Background and Objections

8.7.23. The gist of Paragraph 8.15 was that, with the approval of the St Dominic Square development there was considered to be no further need for major retail development in the Plan period and if a clear need were to arise it would be considered against the criteria of Policy 99S1. It was considered by the Objectors that the Paragraph was wrongly applying the advice in relation to need.

Consideration

8.7.24. The Council proposed changes to the Paragraph to confine any foreseen need to the allocation of sites rather than development and to indicate that "need" was not a prerequisite. Applications for major retail development would be assessed against the Policies of the Plan (PC82 and PC83). Being in line with the wording suggested on behalf of Marks and Spencer, their Objection was conditionally withdrawn.

CHAPTER 8. RECOMMENDATION 2.

8.7.1. That PC82 and PC83 be made.

8.7.2. That the following be added as the first sentence of Paragraph 8.15:-

THE COUNCIL WILL KEEP UNDER REVIEW THROUGH THE MONITORING OF DEVELOPMENTS AND IF NECESSARY SURVEYS THE REQUIREMENT FOR FURTHER MAJOR SHOPPING DEVELOPMENT. THE COUNCIL CONSIDERS THAT WITH GRANTING OF PERMISSION FOR ST DOMINIC SQUARE
... .

8.7.3. That the following be added to the end of Paragraph 8.16:-

IN CONSIDERING NEED IN RELATION TO EDGE OF CENTRE OR OUT OF CENTRE SITES, DEPENDING ON THE CIRCUMSTANCES, AS WELL AS CAPACITY IN PHYSICAL TERMS OR DEMAND IN TERMS OF AVAILABLE EXPENDITURE WITHIN THE PROPOSAL'S CATCHMENT AREA THE COUNCIL MAY CONSIDER IT APPROPRIATE TO HAVE REGARD TO THE TYPE AND SCALE OF RETAIL PROVISION PROPOSED, THE OBJECTIVES OF SUSTAINABILITY IN RETAIL PROVISION AND TRAFFIC GENERATION, THE REGENERATION OF UNDERUSED BROWNFIELD LAND AND OTHER RELEVANT CONSIDERATIONS.

8.7.4. That in Paragraphs 8.15 and 8.17 2500 SQUARE METRES be substituted for 1000 SQUARE METRES.

POLICY 99S2 ADDITIONAL RETAIL FLOORSPACE

Objectors

<i>Objections 837,845</i>	<i>The Guildford Society</i>
<i>Objection 1076</i>	<i>Sainsbury's Supermarkets Ltd</i>
<i>Objection 1411</i>	<i>Mrs K Curtis</i>
<i>Objection 1412</i>	<i>Mrs M S Curtis</i>
<i>Objection 1413</i>	<i>Mrs K Higgins</i>
<i>Objection 1810</i>	<i>Mr T Higgins</i>
<i>Objection 2010</i>	<i>Mr P Marshall</i>

Background, Objections and Issues

8.7.25. The Policy related only to Guildford Town Centre, in which it permitted increases in the total amount of shopping floorspace in increments of 1000sqm or less, developments above that size falling within Policy 99S1.

8.7.26. The Objection of Sainsbury's Supermarkets Ltd was that town centres were the recognised locations for shopping development and that the Policy was unnecessarily restrictive if it were intended to prevent additions of more than 1000sqm. The Guildford

Society asked for the limited increases envisaged to be permitted only if required to meet the needs of Borough residents.

8.7.27. The main issue to arise I considered to be whether the Policy was necessary and if so appropriately expressed.

Consideration

8.7.28. The Council proposed a change to the title of the Policy to better express its purpose - "Additional Retail Development in Guildford Town Centre" (PC84). In the previous Policy I recommended that the threshold for what was to be considered major retail development should be raised to 2500sqm and if that were done it would reflect on this Policy, raising the ceiling of "other" retail developments to 2500sqm.

8.7.29. As in respect of the previous Policy, the status of Guildford Town Centre does not allow restriction of developments to meet the needs only of Borough residents. A sub-regional role implies a larger catchment area and if that role is to be maintained such a test would be inappropriate.

8.7.30. I had some difficulty with the wording, which I felt was not very clear as to the purpose of the Policy. The change proposed to its title would help. A more direct statement in the Policy itself might, however, be considered. There is a suggestion in the recommendation.

8.7.31. In that form, the last sentence of Paragraph 8.17 would not be required, but the preceding sentence might be usefully expanded, also as suggested in the recommendation.

8.7.32. A problem I have alluded to earlier is the definition of Guildford Town Centre on the Proposals Map. The only defined area is by the Town Centre Parking Boundary. This boundary is useable for some policy requirements, but it takes in some quite substantial residential and other areas peripheral to what is the essential retail core. It seems unlikely that it would be sensible to extend a Policy such as this to this wider area. The Council may wish to consider in this instance also whether the Town Centre should be specifically defined on the Proposals Map, or whether the Policy should be expanded or reference made in the reasoned justification to the protection of residential and employment uses. There were Objectors, such as Mr Higgins, who considered that the Town Centre had been allowed to expand into the neighbouring residential areas, such as Pewley Hill and Oxford Terrace. I recognise that the boundary is that of the adopted plan, and that suggestions for including this particular area in the Town Centre have been considered in the past, but, while the Plan protects the residential uses in these peripheral areas, there is a difficulty as to how the Town Centre is defined for planning purposes. In relation to the Objections I have recommended only the least change, an addition to Paragraph 8.18, based on Policy 99H5.

CHAPTER 8. RECOMMENDATION 3.

8.7.5. That PC83 be made.

8.7.6 That Policy 99S2 be reworded:-

PLANNING PERMISSION WILL BE GRANTED FOR SMALL SCALE RETAIL DEVELOPMENT IN GUILDFORD TOWN CENTRE WHERE NO MORE THAN 2500SQM OF ADDITIONAL GROSS FLOOR AREA IS PROVIDED.

8.7.7. That the last sentence of Paragraph 8.17 be omitted and the penultimate sentence changed as follows:-

... THE TOWN CENTRE REMAINS THE MOST APPROPRIATE LOCATION FOR PROPOSALS INVOLVING SMALL SCALE INCREASES IN RETAIL FLOORSPACE WHETHER BY NEW DEVELOPMENT OR CHANGE OF USE.

8.7.8. That the following be added to the end of Paragraph 8.18:-

DEVELOPMENT INVOLVING A NET LOSS OF RESIDENTIAL ACCOMMODATION WILL NOT BE PERMITTED.

POLICY 99S3 PROVISION OF SMALL RETAIL UNITS (CLASS A1)

Objectors

<i>Objection 846</i>	<i>The Guildford Society (CW)</i>
<i>Objection 1040</i>	<i>MEPC</i>
<i>Objection 2041</i>	<i>GOSE</i>

Background, Objections and Issues

8.7.33. A number of representations concerning small shops referred to the St Dominic Square development and were considered earlier. MEPC, the promoters of the scheme, supported the Policy, and pointed out that the small shops, particularly those in the narrow streets linking High Street and North Street, were a particularly valuable feature of the Town Centre. St Dominic Square, on the other hand, provided the opportunity to accommodate the larger units, for which there was a shortage of premises, and slow the process of enlarging shops by the amalgamation of adjoining small units. They suggested that in the supporting paragraphs of this Policy this opportunity would be made clearer if the site were referred to as the appropriate location for larger retail units. The Guildford Society asked for changes in the wording of the Policy to say "retail development, including redevelopment must make provision ...". GOSE were concerned with the imprecise wording of the Policy.

8.7.34. The Council proposed a rewording of the Policy (PC85) which satisfied GOSE and the Guildford Society. The remaining issue was whether there should be an addition to Paragraph 8.19 referring to the St Dominic Square development.

Consideration

8.7.35. The St Dominic Square development has been approved and is not a proposal of the Plan. The points raised by the Objectors as to the value of the existing stock of smaller shops and their distinctive contribution to the character of Guildford Town Centre is recognised by Paragraph 8.19 and is among the objectives of this Policy. That St Dominic Square will relieve pressure for larger units which could tend to otherwise displace smaller is a major point in its favour, but not something I consider needs specific mention.

CHAPTER 8. RECOMMENDATION 4.

8.7.9. That PC85 be made.

8. IDENTIFIED SHOPPING AREAS

8.8.1. The first four Policies of the Section relate to the shopping areas of Guildford Town Centre. The frontages concerned are indicated on the Proposals Map. The object of the Plan remains to maintain the retail function while achieving an appropriate mix of uses to maintain the vitality and viability of the Town Centre. The frontages defined denote a hierarchy and their principal purpose is to provide graded measures of control over the introduction of non-retail uses. The adopted plan identified only the prime shopping area, but it is reasonable and within the advice to review the effectiveness of earlier policies when a plan is reviewed. PPG6 gives countenance to distinguishing between primary and secondary frontages and the consideration of their relative importance to the character of the Town Centre. It asks for the definition to be realistic, and it appears that the distinction between primary and secondary used in the Plan was on the basis of rental values and pedestrian flows as suggested in the advice. Several Objectors drew attention to their being four sets of defined frontages, rather than two. The Council had seen the control of non-retail uses as better defined in this way. I have seen the three lower divisions as in fact all parts of the secondary frontages, in which different attitudes to non-retail uses are proposed.

POLICY 99S4 GUILDFORD TOWN CENTRE PRIMARY SHOPPING AREA

Objectors

<i>Objection 52</i>	<i>Ash Green Residents Association</i>
<i>Objection 315</i>	<i>GOSE</i>
<i>Objection 683</i>	<i>Halifax Plc</i>

Background, Objections and Issues

8.8.2. The Primary Shopping Area is defined as frontages to the pedestrianised part of the High Street where one of the Centre's departmental stores and a number of the retail

multiplés are located. The Policy would not permit the change of use of existing shops to other uses.

8.8.3. The Ash Green Residents Association considered that the defined Primary Shopping Area should be drawn more widely, to include streets linked to the defined part of the High Street, among them the remainder of High Street, part of Quarry Street, Friary Street, Phoenix Court, White Lion Walk, Swan Lane, Market Street, Angel Gate, Jeffries Passage, Tunsgate and Chapel Street. GOSE considered the Policy too restrictive, and to overlook the potential use of upper floors. Halifax Plc were concerned at the restriction of other uses in these frontages, particularly their own, which they believed had proved beneficial. They suggested that the Policy be redrafted as a criteria based policy to permit uses in Classes A2 and A3.

8.8.4. The main issues were whether the Primary Area was accurately defined and the Policy too inflexible.

Consideration

8.8.5. The reasoned justification for the Policy indicates that the Primary Shopping Area was defined in relation to the rental values and the pedestrian traffic of the Town Centre. It is arguable that other parts of the Centre could also qualify - some of those frontages mentioned by the Ash Green Residents Association, the Shopping Malls or the Debenhams Store might be seen as examples. The Plan or the supporting Topic Paper do not enlarge on the definition of the frontages and different cut offs might have produced a different pattern of primary and secondary areas.

8.8.6. However, the advice has in recent years stressed that an important element in maintaining the vitality and viability of shopping centres is allowing for a mix of uses, including the Class A2 and A3 uses. This, and the other defined frontage Policies, being to guide the advent of other uses in the shopping parades, there is much to be said for keeping the area defined for the strictest control confined to the frontages of most importance in the retail role. For that reason I do not suggest that the extent of the Primary Area should be enlarged.

8.8.7. I noted that, although the Primary Area includes many of the principal shops, it is not exclusively retail. However, it expresses the character of the Town Centre and the fact that it is predominantly retail underlines this public aspect of the function of the Centre. What is said by Halifax Plc is accepted. Many Class A2 and A3 uses can be located without serious harm in Primary shopping frontages in terms of customer attraction and rental values. The Policies which follow and relate to the greater part of the Town Centre recognise this. When it comes to character and perceptions, however, I can support the Council's purpose in seeking to restrain further changes away from shops in this attractive, prominent, but relatively small part of the Town Centre.

8.8.8. The question of the control by the Policy of the use of upper floors would enter in only where the upper floors of buildings in the Primary Shopping Area are at present in retail use. I accept that protecting the ground floor frontage should be seen as the primary

objective of the Policy, but in so far as where the upper floor is part of the shop unit, I would not see that the upper floors should be exempted from the Policy. Where upper floors are in other business uses, changes to Class A2 or A3 uses would need to be considered on their merits. The Plan does not to my mind need to comment on this.

Conclusions

8.8.9. I have regarded the part of the High Street covered by this Policy as the defining area of Guildford Town Centre, widely known and recognised and worthy of every effort to conserve its established character. The Plan affords ample opportunity for the location of non-retail uses in other main frontages, including frontages immediately adjoining the High Street. I consider that in this relatively small and well defined area changes from retail uses to Class A2 and A3 uses, while arguably not in themselves affecting the vitality of the Centre if located in main shopping frontages, could in this part of the High Street undermine its character. I see the Policy as justified and suggest no changes.

POLICY 99S5

GUILDFORD TOWN CENTRE SECONDARY SHOPPING
AREAS

Objectors

Objection 316

GOSE (CW)

Objection 337

Motcomb Estates

Objection 837

The Guildford Society

Objections 1027/8

Robert Shaw and Partners

Objections 1813/4

ARP 050

Background, Objections and Issues

8.8.10. The Policy relates to the greater part of the shopping frontages of Guildford Town Centre, many of which the shopper would regard as among the most significant. In these frontages Class A2 and A3 uses are permitted, subject to four criteria being met, and the Policy extends a protection to all Class A uses (including those of Class A2 and A3) in these frontages.

8.8.11. The Objectors raised a number of matters, in particular that the identification of the Secondary Shopping Area was inconsistent, including some uses that were not within Class A, while the Policy itself was arbitrary and inflexible. Whether this was the case was the principal issue. Issues concerning the provision of short-term parking to support shopping in the Town Centre were considered earlier.

Consideration

8.8.12. PPG6 indicates that in the secondary frontages there should be more flexibility, for it is in those areas that diversification has most to contribute. As mentioned earlier, the Secondary Shopping Area covers the greater part of the Guildford shopping centre and the

Policy is in consequence likely to be the one that will be most tested as to its appropriateness and its conformity with the advice.

8.8.13. Although saying that there should be flexibility, the advice does not imply that there should be no protection for the retail function in the secondary frontages. There is also the implication that amenity, environmental or traffic problems that can be associated with some Class A3 uses should be taken into account. How this is done in relation to any particular centre depends in no small measure on the form and character of that centre. Guildford, with its narrow streets connecting the more major shopping concentrations may be vulnerable to concentrations of non-retail uses, while their effects on the amenity of the residential accommodation that remains in the centre is important. There is always a danger that such a Policy may appear arbitrary, but it was not my feeling that that was a fair criticism in this instance.

8.8.14. I noted that in some locations the criteria of the Policy are already exceeded, but this is perhaps more a pointer to the need for such guidelines rather than undermining them. A problem mentioned by some objectors was how to count parts of the frontages that are not in Class A uses and may not have been built to present a shopfront to the street, offices principally, and how the introduction non-Class A uses should be regarded. PPG6 refers to the value of uses outside Class A in contributing to the mix of uses that can contribute to the vitality and viability of centres. In most instances, it would probably be appropriate to count these frontages, where they are within a shopping frontage, as non-Class A1 uses. It is the break in the shopping frontage that can be the most important consideration. These are, however, matters that must be judged in the light of the location and the circumstances. The Policy could not easily cover all eventualities.

8.8.15. The managers of Dolphin House, North Street, expressed their problem of how a building originally built as a large shop having secondary frontages at different levels onto different streets would fare in the light of the Policy. The building is now somewhat detached from the shopping centre and the main uses of the upper level are not retailing. The managers were not sanguine that a retail use of the lower ground floors could be continued. The building is something of a special case in terms of its design and location, one aspect of its siting being that it is opposite residential wings of Abbots Hospital. The changes to the Policy suggested by the Objector might ease the situation from their point of view, but would leave only a tenuous control in other frontages where there is a greater risk to the continuity of the shopping function. It seems inevitable that the future of Dolphin House will need to be considered on the basis of its individual circumstances.

8.8.16. The Council acknowledged the accidental inclusion of the Grammar School buildings in the defined shopping frontage to Upper High Street and proposed their removal (PC86). Objectors also questioned the inclusion of the frontages within the covered malls of the Town Centre, suggesting that the occupation should be a subject for their managers and pointing to the difficulty of showing both frontages when the malls provided two shopping floors. I saw the importance of the malls to the shopping content of the Town Centre as of such significance that they should be included. I was satisfied that by indicating a frontage on the Proposals Map, if there were different stories, both would be included in the Policy.

8.8.17. The final paragraph of the Policy related to the protection of all Class A uses. A similar paragraph appears in the Policies which follow. GOSE considered that the paragraph was overly restrictive and lacked a specific justification in the Plan.

8.8.18. The Class A uses as a whole are seen by PPG6 to be essentially similar activities that are generally to be found in shopping areas and significant contributors to the varied pattern of activities which makes for the vitality and viability of a shopping centre. As with the shops, there is a logic, if not normally a pressing need, to protect the opportunity for such uses to be continued by safeguarding suitable premises. The only change proposed by the Council to the Policy itself was to signify that the protection extended only to the ground floor level (PC86).

8.8.19. The Objection was conditionally withdrawn, but a need remains to consider whether the reasoned justification should give some explanation of the purpose of this part of the Policy. One problem is that the Paragraph has the implication that existing individual uses are to be retained, rather than that the objective is to keep the premises available for Class A uses. Another problem is that there are other uses often to be found in shopping parades that are not included in Class A. No doubt the Council would wish to consider these on their merits, but the Policy should not shut out these uses. They include, for example, some Class B1 uses, amusement arcades, launderettes, medical surgeries and taxi offices.

8.8.20. It would be possible to alter the paragraph to make it wider. One possibility would be:-

Loss of shopping area uses (Class A) at ground floor level will be permitted only exceptionally where the replacement uses are themselves appropriate to a shopping frontage.

An alternative would be to add a sentence to the reasoned justification:-

It is the Council's purpose to safeguard for Class A uses premises currently in those uses. Where ground floor premises are suitable for such uses other uses will be resisted, except where the replacement uses are themselves appropriate to a shopping frontage.

I have suggested the change to the Policy (and to the other Policies where this paragraph appears).

Conclusions

8.8.21. I was of the view that the Policy had been judged carefully in relation to the need and the perceived threats to Guildford Town Centre. Essentially a development control tool, it was an updating of the policy of the adopted plan which I saw to be required by the circumstances and reasonable in the measures of control it was proposing.

CHAPTER 8. RECOMMENDATION 5.

8.8.1. That PC86 be made.

8.8.2 That the final paragraph of Policy 99S5 be changed as follows:-

LOSS OF SHOPPING AREA USES (CLASS A) AT GROUND FLOOR LEVEL WILL BE PERMITTED ONLY EXCEPTIONALLY WHERE THE REPLACEMENT USES ARE THEMSELVES APPROPRIATE TO A SHOPPING FRONTAGE.

POLICY 99S6 GUILDFORD TOWN CENTRE TERTIARY SHOPPING AREAS

Objectors

<i>Objection 46</i>	<i>Ash Green Residents Association</i>
<i>Objection 317</i>	<i>GOSE</i>
<i>Objection 346</i>	<i>Motcomb Estate</i>
<i>Objection 525</i>	<i>Prudential Portfolio Management</i>
<i>Objection 677</i>	<i>Rank Leisure Division</i>
<i>Objection 1029</i>	<i>Robert Shaw and Partners</i>
<i>Objection 2011</i>	<i>Mr P Marshall</i>

Background, Objections and Issues

8.8.22. The Tertiary Shopping Areas defined were in the further part of Upper High Street and Epsom Road and on the western side of Sydenham Road. In part, these frontages perform some of the lower order shopping functions of the Town Centre, serving the local residential community. The Policy, in the extent of Class A2 and A3 uses it would permit could be seen to be permissive of these activities. As the previous Policy, it seeks to protect existing Class A uses as a whole.

8.8.23. Objectors pointed out that PPG6 did not refer to divisions of shopping frontages beyond Secondary and considered the Policy should be merged with an amended Policy 99S5. They also considered the Policy too restrictive and inflexible in not allowing a greater degree of non-retail use, including uses outside Class A, in these frontages. It was considered that the Tertiary Shopping Area should be extended to Bridge Street and to the Sydenham Road car park, which is to have shops on its ground floor frontage.

8.8.24. The main issues were whether the Policy was appropriate and sufficiently flexible.

Consideration

8.8.25. The purpose of the Policy is to provide in certain limited frontages a greater degree of flexibility to accommodate Class A2 and A3 uses than in the Secondary Shopping Area. It was accepted that PPG6 does not specifically mention the identification of tertiary shopping areas, but I do not see that as debarring their use and as I mentioned in the opening of this Section, they and the Specialist Shopping Area can be seen as subdivisions of the Secondary Shopping Area. Being largely peripheral to the main centre of retail activity it is appropriate to regard the maintenance of the shopping function in the Tertiary Shopping Area as of less importance than in the Secondary Shopping Area and other of the Class A uses, therefore, more to be welcomed.

8.8.26. It is the Class A uses that are seen as contributing most to the vitality and viability of shopping centres, but as mentioned in relation to the previous Policy, there are other uses which can be appropriately located in shopping centres with advantage. As in the case of that Policy, the last paragraph could be changed, or an addition made to the reasoned justification. In the recommendation I have suggested the former.

8.8.27. The inclusion of Bridge Street in the Tertiary Shopping Area, on the basis that it would prevent the further spread of Class A3 uses, would now seem to be superfluous, little retail activity remaining. The concentration of Class A3 uses in this short length of street appears to have been the result of a conscious decision by the Council. The street has a general suitability for such uses compared with other parts of the Town Centre, which would otherwise have come under pressure. Although there are relatively few shops proposed in the Sydenham Road Car Park, with the opposite side of the road designated as part of the Tertiary Area and Secondary frontages close by, I did not see that this should not be included in the Tertiary area.

Conclusions

8.8.28. I see an adequate justification for defining a Tertiary Shopping Area in the Plan and consider that it is sufficiently flexible to achieve its purpose of permitting variety, while retaining these frontages for the retail function of the Town Centre.

CHAPTER 8. RECOMMENDATION 6.

8.8.3. That PC87 be made.

8.8.4. That the frontage to Sydenham Road of the Sydenham Road Car Park be added to the Tertiary Shopping Area.

8.8.5. That the final paragraph of Policy 99S6 be changed as follows:-

LOSS OF SHOPPING AREA USES (CLASS A) AT GROUND FLOOR LEVEL WILL BE PERMITTED ONLY EXCEPTIONALLY WHERE THE REPLACEMENT USES ARE THEMSELVES APPROPRIATE TO A SHOPPING FRONTAGE.

Objectors

Objection 318
Objection 684
Objection 1030

GOSE (CW)
Halifax Plc
Robert Shaw and Partners

Background, Objections and Issues

8.8.29. Two small areas are defined for this Policy, in Chapel Street/Castle Street and adjoining Friary Street. The Policy permits Class A3 uses, already major uses in the defined areas, but does not permit Class A2 uses.

8.8.30. The Objections were the same as those to the previous Policy, essentially questioning the necessity for the Policy and claiming that it was too restrictive.

Consideration

8.8.31. My views on the use of these further divisions of the shopping area were given above. In this instance there is freedom for Class A3 uses, but the Class A2 uses are to be restricted. There are safeguards against the potentially less desirable aspects of the Class A3 uses.

8.8.32. The Policy applies to relatively very small parts of the Town Centre, where the use pattern already includes mainly small Class A3 uses. They have an undeniable character, Chapel Street in particular, for which they are locally recognised. While noting the advice, I would find it difficult to accept that opening them as freely to other non-retail uses would add very much to the variety, attraction or character of these frontages. If their role were diminished, I could see that many local people would consider that the Town Centre had lost something of importance.

CHAPTER 8. RECOMMENDATION 7.

8.8.6. That PC88 be made.

8.8.7. That the final paragraph of Policy 99S7 be changed as follows:-

LOSS OF SHOPPING AREA USES (CLASS A) AT GROUND
FLOOR LEVEL WILL BE PERMITTED ONLY EXCEPTIONALLY
WHERE THE REPLACEMENT USES ARE THEMSELVES
APPROPRIATE TO A SHOPPING FRONTAGE.

Objectors

<i>Objection 100</i>	<i>Mr A E Rees (CW)</i>
<i>Objection 101</i>	<i>Mr G Keen</i>
<i>Objection 319</i>	<i>GOSE (CW)</i>
<i>Objection 1099</i>	<i>Ms M Tait (CW)</i>

Background, Objections and Issues

8.8.33. The Policy relates to two District Centres, Station Parade, East Horsley, and Wharf Road, Ash, permitting increases in retail floorspace appropriate to their scale and function and providing criteria by which losses of shops to other Class A uses can be controlled. Loss of Class A uses will not be permitted.

8.8.34. GOSE was concerned that this last objective of the Policy was overly restrictive and that there was not justification provided. The other Objections concerned the inclusion in the Wharf Road, Ash Vale, District Centre of Nos 24, 26 and 28 Wharf Road, residential properties adjoining the shopping parade. The Council agreed that these properties should be removed from the designation shown on the Proposals Map (PC89). The only issue remaining was whether it was appropriate to protect all Class A uses, and, if so, should an explanation of the reasons be given.

Consideration

8.8.35. The phrase contained in this Policy featured in Policies 99S5-99S9, in all instances a proposed change would confine the protection for Class A uses to the ground floor. As in the earlier instances, a change could be made to the final paragraph of the Policy, or an addition made to the reasoned justification. I have recommended the former.

CHAPTER 8. RECOMMENDATION 8.

8.8.8. That PC89 be made.

8.8.9. That the final paragraph of Policy 99S8 be changed as follows:-

LOSS OF SHOPPING AREA USES (CLASS A) AT GROUND FLOOR LEVEL WILL BE PERMITTED ONLY EXCEPTIONALLY WHERE THE REPLACEMENT USES ARE THEMSELVES APPROPRIATE TO A SHOPPING FRONTAGE.

Objectors

Objection 321
Objection 1213
Objection 1346

GOSE (CW)
Tesco Stores Ltd (CW)
Shalford Conservation Society

Background, Objections and Issues

8.8.36. The Policy lists local shopping centres to which it relates, the centres being denoted on the proposals Map. Limited increases in retail floorspace consistent with the scale and function of the centre are permitted. Proposals for further Class A2 and A3 uses would be considered in the light of the criteria listed in the Policy. A final paragraph limits the loss of Class A uses.

8.8.37. The Objection by GOSE mirrored those made to earlier Policies. Tesco Stores Ltd drew attention to the word "limited" in relation to increases in floorspace, the sequential process of locating new shopping provision recognising local shopping centres as locations to be preferred in certain circumstances.

8.8.38. The Council proposed to add "at ground floor level" to the final paragraph and to remove "limited" (PC90). The first two Objections were as a result conditionally withdrawn. It was also proposed to add Ash Vale parade to the list of local centres, an acknowledged omission (PC172). The Objection of the Shalford Conservation Society drew attention to the need for short term parking for customers of the Convenience Store and the Post Office in Kings Road, Shalford. The lack of parking was of significance to the viability of these businesses, of great value to the local community.

Consideration

8.8.39. Although the Objection of GOSE was conditionally withdrawn, I consider that the same change should be made to the final paragraph of the Policy as in the preceding Policies. The question of providing parking for the Shalford shops is not strictly a matter for the Plan, but the significance of the need can be appreciated. The Plan, however, notes in Paragraph 8.31 that the Council operates an ongoing programme of improvements from which some local centres could benefit. Among other things could be rationalising parking provision.

CHAPTER 8. RECOMMENDATION 9.

8.8.10. That PC90 be made.

8.8.11. That PC172 be made.

8.8.12. That the final paragraph of Policy 99S9 be changed as follows:-

LOSS OF SHOPPING AREA USES (CLASS A) AT GROUND FLOOR LEVEL WILL BE PERMITTED ONLY EXCEPTIONALLY WHERE THE REPLACEMENT USES ARE THEMSELVES APPROPRIATE TO A SHOPPING FRONTAGE.

9. OTHER SHOPPING POLICIES

POLICY 99S10 NEIGHBOURHOOD SHOPS

Objectors

<i>Objection 65</i>	<i>Mrs S A Stapleton</i>
<i>Objection 702</i>	<i>West Clandon Parish Council</i>
<i>Objection 1031</i>	<i>Robert Shaw and Partners</i>
<i>Objection 1449</i>	<i>West Horsley Parish Council (CW)</i>
<i>Objection C28</i>	<i>Horsley Countryside Preservation Society</i>
<i>Objection C147</i>	<i>CPRE Surrey</i>

Background, Objections and Issues

8.9.1. The Policy protects single and small groups of shops outside the shopping centres named in earlier Policies. The protection is to be afforded by imposition of a requirement to demonstrate through the marketing of the premises concerned that there is no demand for its retention as a shop. Other criteria control environmental concerns of a replacement use.

8.9.2 The Objections raised a number of issues relating principally to rural shops. Various aspects of the Policy were criticised, including its adequacy for its task, the use of a marketing test and its failure to identify the shops to which it would apply. While it was questioned whether it was necessary to have such a Policy, the main issues related to the expression of the Policy.

Consideration

8.9.3. West Clandon Parish Council felt that the closure of village shops was not receiving sufficient attention. PPG6 and PPG7 both advise on the economic and social role of shops in rural areas, not least the single or small groups of shops. This importance is to be taken into account in considering changes of use. This is, however, a complex matter and this Chapter, as well as other parts of the Plan, address the problem as best they can. There is mention also of other initiatives of the Council to help rural shops, through rate relief in particular. This Policy would help by requiring a marketing exercise to be undertaken to demonstrate that there was no effective demand for the premises to be used as a shop before a change of use were permitted. It can be appreciated that in some instances other uses may command a higher property value than a shop use. Residential may be among them in a rural area. Peoples habits in shopping for convenience goods have changed with the advent of the supermarket. It is not possible to turn the clock back and counter productive as far as the

majority of the population is concerned to attempt to do so. The objective of sustainability, however, includes taking what measures are possible to reduce dependence on the car and distant shopping locations.

8.9.4. The use of a market test was not seen as appropriate by some Objectors. It is, nevertheless, one of the few ways available of gauging whether there is a basis for retaining a building in retail use. The expression of the marketing exercise envisaged was also criticised and the Council proposed changes to make it more easily understood (PC91). Counter Objectors saw the proposed change as weakening the effectiveness of the Policy, but a test such as this has to be realistic if it is not to impose an unreasonable burden on the owner of shop premises by preventing or unduly delaying the realisation of a proper value for the property. To my mind this was a necessary and appropriate change to the Policy which, as the Council suggested, would be likely to make it stronger rather than weaker.

8.9.5. There was a suggestion that the shops at Peaslake should be named in the Policy. The two shops in Peaslake do not qualify as a Local Shopping Centre in the terms set out in Paragraph 8.28 and a number of other single and small groups of shops are similarly placed. The submission was that this would add to their protection. This may be so, but my view was that the objective of this Policy was to afford as much protection as was reasonable and practical to the single and small groups of shops to be found about the Plan area. To list them all would be unnecessary for this purpose. To list those in Peaslake alone would introduce an inconsistency undesirable in any planning policy.

8.9.6. What may be missing in the Plan is the positive acceptance of the conversion and extension of shops suggested by PPG6, if it improves their viability. The Policies of the Plan relating to the provision of the smaller scale new retail floor space relate only to the identified shopping centres. Recognition of other forms of retailing that are becoming more common could also be required. Petrol filling stations not infrequently include convenience goods sales and can be regarded as neighbourhood shops. A new initial paragraph could be added to the Policy and a further short paragraph to the reasoned justification. There are suggestions in the recommendation.

Conclusions

8.9.7. To my mind the Policy is a necessary one, but needs also to recognise positively the possibility of new or expanded provision of neighbourhood shopping. As far as protecting existing retail provision is concerned, with the changes proposed to the reasoned justification the Policy goes as far as is reasonable and practical to safeguard individual and small groups of shops, particularly those in the rural area.

CHAPTER 8. RECOMMENDATION 10.

8.9.1. That PC91 be made.

8.9.2. That the following initial paragraph be added to Policy 99S10:-

OUTSIDE THE IDENTIFIED SHOPPING CENTRES BUT WITHIN THE URBAN AREA OR THE SETTLEMENT BOUNDARIES PERMISSION WILL BE GRANTED FOR SMALL SCALE INDIVIDUAL SHOPS AND SHOP EXTENSIONS PROVIDING FOR THE DAILY SHOPPING NEEDS OF THE LOCAL COMMUNITY, SUBJECT TO THE CRITERIA SET OUT IN THE GENERAL POLICIES OF THE PLAN.

8.9.3. That the following paragraph be added to the reasoned justification:-

THE COUNCIL RECOGNISES THAT THERE MAY BE OPPORTUNITIES TO IMPROVE THE PROVISION FOR THE DAILY SHOPPING NEEDS OF LOCAL COMMUNITIES AND TO IMPROVE THE VIABILITY OF LOCAL SHOPS BY EXTENDING EXISTING SHOPS OR, IN SOME INSTANCES, PROVIDING NEW SHOPS BY CONVERSION OR NEW BUILDING. THE VALUE OF SERVICES PROVIDED BY PETROL FILLING STATIONS AND OUTLETS SUCH AS FARM SHOPS WHERE CONVENIENCE GOODS AND OTHER DAY-TO-DAY NEEDS ARE CATERED FOR IS ALSO ACCEPTED. IN CONSIDERING SUCH PROPOSALS THE COUNCIL WILL HAVE REGARD TO THE GENERAL POLICIES OF THE PLAN, PARTICULARLY THOSE RELATING TO ACCESSIBILITY BY MEANS OTHER THAN THE CAR, ACCESS AND HIGHWAY SAFETY, RESIDENTIAL AMENITY AND THE CHARACTER AND APPEARANCE OF THE AREA.

CHAPTER 9. GUILDFORD TOWN REDEVELOPMENT SITES

1. INTRODUCTION

9.1.1. The Chapter identifies sites within the Town Centre and in the immediately surrounding area where development is a prospect. Three categories of site are defined:-

- (i) Proposal sites, sites on which redevelopment is expected during the Plan period (Proposals 99GT1-4);
- (ii) Opportunity sites, where redevelopment is considered appropriate, but the time scale is uncertain (Proposals 99GT5-8); and
- (iii) Major approved development sites, where permission has been granted, but development has yet to take place (the St Dominic Square site).

9.1.2. The individual Proposals indicate the uses proposed and that planning briefs will be prepared for the sites in Category (i), and, if they come forward for development in the Plan period, for those in Category (ii) also. The perceived need mentioned is for hotels, preferably with conference facilities. Several of the sites have an hotel among the acceptable uses.

Objectors

Objections 847,858

Objection 1929

Objection C148

The Guildford Society

Mrs P M Wood

CPRE Surrey

9.1.3. The Society made a general comment that at least one major improvement should be made to Guildford during the Plan period. An obvious need was seen to be an improved Civic Hall. Even if there were no proposal, the Plan could state the need.

9.1.4. I could sympathise with the idea, but the Plan has to deal in concrete development proposals even if it would be of comfort to local people to include what the Council, or others, might like to see in the future. The Council indicated that the existing Civic Hall had been refurbished in recent years and there were no proposals to redevelop the site or to seek a site for a new hall. In the circumstances the Council is right to resist including the suggestion.

9.1.5. The Society's greater concern appeared to be over the need for further hotels in the Town. The indications of this Chapter were welcomed, but it was pointed out that the sites mentioned would be unlikely to provide an hotel and conference facilities of the size the Town really needed. It was suggested that the size of the facility proposed should be stated, and coordination with the University sought on appropriate provision. The Plan should indicate the number of hotel rooms available and the addition that was aimed for.

9.1.6. The Council considered that this was too detailed a point for the Plan, and I would agree. The point is, however, a real one and should be a matter that could be usefully

included in the development briefs for those sites where an hotel is among the acceptable uses.

9.1.7. Mrs Wood's Objection was a general complaint that too much development has spoilt the "country town" feel and appearance of Guildford. Many of the new buildings, she thought, have been unsympathetic to the character of the town, while a deteriorating traffic situation has made things worse.

9.1.8. I have no doubt many local people would echo Mrs Wood's views, and that similar complaints would be heard in respect of most towns in Britain. Guildford has been remarkably successful as a commercial centre, and the Council commented that not all of the new development that has taken place has been wholly satisfactory. As a sub-regional shopping and business centre, the "small town" feel is likely to suffer some erosion. Nevertheless, Guildford has coped with the pressures for redevelopment and expansion better than most and, if mistakes have been made, seen in retrospect, there has also been a singular success in maintaining a character and appearance that belies the scale of the Town. If it is any comfort to Mrs Wood, in my view the Plan is rigorous in seeking to retain what is best in Guildford, while permitting the continuing change necessary to preserve its functions and tackling the obvious problems of traffic.

2. OBJECTIVES

Objectors

Objection 862
Objection 1171

The Guildford Society
Action

Background, Objections and Issues

9.2.1. The Section sets out six key objectives for Guildford Town Centre. The Objectors suggested the addition of three further objectives:-

1. Provision of a small public open space by the river on the site of the former Farnham Road bus station;
2. Improvements to the Civic Hall (subsequently withdrawn); and
3. Provision of enhanced community facilities.

9.2.2. The main issue to arise was whether these should be added to the objectives.

Consideration

9.2.3. Other Chapters of the Plan deal with open space and community facilities, although as far as community facilities are concerned, a number are provided in the Town Centre, some affected by the Proposals of this Chapter. There are, however, Policies in the other Chapters that seek to protect existing recreational and community facilities, as well as to provide new, and I can appreciate that the Council should see the matters as not appropriate in this Chapter.

9.2.4. The Plan seeks to protect existing open spaces. There is also a Policy (99R5) which seeks to achieve recreational open space provision in relation to new commercial developments. This is in support of an Objective of Chapter 13 and would not require a similar objective for this Chapter. The site of the Farnham Road bus station is among those identified for development in the Plan, and, while, as deposited, the Proposals did not specify the provision of open space, that was proposed to be added by PC95.

9.2.5. It appeared to me that the Objectors purposes were being met through the operation of the Plan, without the addition of further objectives to the Chapter.

3. SUPPORTING MEASURES

9.3.1. The Section gave two supporting measures, continued employment of a Town Centre Manager and the implementation of further environmental improvements. The Section attracted no Objections.

4. PROPOSALS SITES

9.4.1. The Section identifies four sites which are anticipated to be developed in the Plan period.

Objection 1499

Beazer Strategic Land

9.4.2. In this Objection the Objector queried the distinction between "Proposals" and "Opportunity" sites. In the Objectors view, the Proposals sites were subject to constraints and uncertainties which made them no different from the Opportunity sites. As mentioned earlier, the difference seen by the Council was between sites which could be expected with reasonable certainty to be developed in the Plan period and sites that were potentially available, but for which there could not be that certainty. One factor in this difference was that three of the Proposals sites were in the Council's ownership, while the fourth was being marketed by MOD.

9.4.3. I could accept that there are constraints to development, but they did not seem likely to prevent the sites coming forward in the Plan period. If all of the sites could be seen as no more than Opportunity sites, in another view all could equally be seen as Proposals, with the differentiation dispensed with, all of the sites having a strong likelihood of coming forward for development in the Plan period. I see no objection to the refinement introduced by the Plan of dividing them into the certain and the less certain, which could prove a useful guide to site owners and prospective developers, as well as offering a useful explanation to the Plan's users in general.

Non-residential parking provision in developments.

9.4.4. While not a part of this Objection, in the reasoned justification to the Proposals mention is made of commuted payments in lieu of parking provision for non-residential uses.

Reference is given to Policy 99M4, which in the deposited plan would be accurate, but that Policy is the subject of proposed changes which, among other things, remove the references to commuted payments. Changes will be required also in this Chapter, and on the model provided for the new Proposal for the former Odeon Cinema, substituting reference to Policy 99G1(1), which contains the revised policies for parking provision, may be sufficient. I have made a general recommendation that these references be changed to convey the policy in its revised form.

CHAPTER 9. RECOMMENDATION 1.

- 9.4.1. That references in the reasoned justification of the Proposals to the expectation of commuted payments in lieu of parking for non-residential development under Policy 99M4 be revised to accord with other changes to the Plan.

PROPOSAL 99GT1. LAND AT BEDFORD ROAD OPPOSITE THE ODEON CINEMA

Objectors

<i>Objection 187</i>	<i>Mrs E Hardy</i>
<i>Objection 188</i>	<i>Quadrant Village Ltd (CW)</i>
<i>Objection 1168</i>	<i>Action</i>
<i>Objection 1201</i>	<i>National Trust</i>
<i>Objection 1399</i>	<i>Bewley Homes Plc</i>
<i>Objection 1435</i>	<i>Environment Agency</i>
<i>Objection 1699</i>	<i>The College of Law</i>
<i>Objection 1746</i>	<i>Fays Studios (CW)</i>
<i>Objection 1782</i>	<i>Consortium of Registered Social Landlords</i>

Background, Objections and Issues

9.4.5. The site lies on the north western side of the Town Centre, a block of what was at one time older residential and small commercial buildings between the properties facing Bridge Street and the large paved area in front of a new multiplex cinema development, the western side of the site abutting the River Wey. The Plan proposed development for residential, hotel or office uses.

9.4.6. The Objections raised some general points as to the residential and hotel uses proposed, and suggested other uses that would be appropriate for the site. The form the development should take also figured in the Objections, particularly the limitation of buildings to 4 storeys. Flooding risks and the historic interest of the adjoining Navigation were also raised. I understood that the planning brief had made some progress and that agreement with a prospective developer, The Quadrant Village Ltd, was imminent at the time of the Inquiry.

9.4.7. The main issues were whether the Proposal should be changed to take account of these matters.

Consideration

(a) Form of the development.

9.4.8. The prospective developers were concerned that the Plan should limit development to a restricted range of uses, seeing it as an opportunity to develop an urban village of appropriate town centre uses. They believed that the Plan should seek a comprehensive development, which would provide in addition to a mixed development, open space along the River and improved access to Bridge Street/Onslow Street. With this in mind, the limitation to 4 storeys given in Paragraph 9.15 was seen as too prescriptive on the form the scheme might take.

9.4.9. The Council accepted much of this, agreeing that the Proposal could be changed, not only to add further uses, but to say more about the development envisaged. Paragraph 9.15 could also be reworded to refer to "a high quality architectural solution that responds positively to the complex character of the surrounding townscape ...". I noted that the issue of height remained in connection with the planning brief, but from the point of view of the Plan these changes seemed sufficient. I have included them in full in the recommendation.

(b) Housing and affordable housing.

9.4.10. Residential is one of the proposed uses of the site, singly or in combination with other of the uses mentioned. No quantity had been mentioned by the Plan, but it was specified in the planning brief. By way of clarification, the Council confirmed that any housing provision that might arise on this site would be additional to the allocations made in Chapter 5, Housing, and regardable as a "windfall".

9.4.11. I accepted that the modern situation and surroundings offered new opportunities for the site to contribute to the Town Centre in a variety of commercial and community uses as well as housing. This argued strongly against an allocation of the site for residential use alone, although its greater use in the past had been residential. As to affordable housing, again the Proposal would permit a development wholly of affordable housing should a social housing provider consider the site suitable and a viable proposition. Otherwise, the site being of less than 0.5ha, Policy 99H11, Affordable Housing, would apply only if a residential development contained 15 or more dwellings. If that were the case, the Council would seek to negotiate for an element of the housing provided to be "affordable". Policy 99H11 set a target of 30% of the dwellings in a qualifying development. I do not consider that it would be practicable to set a higher target.

9.4.12. Proposed Change 174 was to alter the figure of 0.5ha in Paragraph 9.16 to 0.4ha. This first figure derives directly from Policy 99H11, where there is no proposal for a similar change. There would be no justification for applying this lower threshold for the

operation of Policy 99H11 in the town centre without changing the lead Policy. I do not, therefore recommend that this change be made.

9.4.13. Objectors mentioned the Number 5 project (a hostel for homeless people) previously housed on the site, which I understood had been successfully relocated in York Road.

(c) Hotel use.

9.4.14. The College of Law saw the site as an unlikely candidate for an hotel, advocating a site at Braboeuf Manor. I could accept that to house an hotel with conference facilities and possibly other uses while maintaining the general character of this part of the Town Centre, the site could be seen to be rather small, but I did not see it to be impractical. The Plan is promoting further hotel development in Guildford, this site being one of several on which the use could be acceptable. The merits of the grounds of the College for this purpose are not relevant to the consideration of this Proposal, there being likely to be room for more than one further hotel in Guildford.

(d) Proposed further uses

9.4.15. As mentioned earlier, other uses than those mentioned in the Plan were deemed appropriate for this location. The possibility of locating a supermarket to serve the bottom end of the town was mentioned by Mrs Hardy and retailing was among the uses proposed to be added. The Council also considered that it would be appropriate to add cultural, leisure and entertainment uses (PC93), which bearing in mind the character of its surroundings I accept could be suitably located here.

(e) River Wey

9.4.16. It was pointed out by the Environment Agency that the site was in the floodplain of the River and the risks this entailed should be highlighted. The Council agreed to change Paragraph 9.12 to stress this point (PC94 and PC173). The National Trust asked that the Plan recognise the historic interest and relevance of the Guildford and Godalming Navigations. A change to Paragraph 9.17 was proposed by the Council to draw attention to this in the Plan (PC93).

(f) Fay Studios

9.4.17. The premises of Fay Studios adjoin the site, but had been included in the site shown on the Proposals Map. The Council accepted that this was an error, which it was proposed to correct (PC93).

Conclusions

9.4.18. This scheme appeared to have progressed some way towards finality at the time of the Inquiry, but not being involved in the detail of the planning brief my concern was to ensure that the Plan was providing an accurate basis for what was emerging, but one that was

flexible enough accommodate subsequent changes. The changes proposed by the Council took in many of the points of Objectors and to my mind framed a satisfactory Proposal.

CHAPTER 9. RECOMMENDATION 2.

- 9.4.2. That PC93 be made.
- 9.4.3. That PC94 be made.
- 9.4.4. That PC173 be made.
- 9.4.5. That PC174 be NOT made.
- 9.4.6. That the following sentences be added to Proposal 99GT1:-

THERE SHOULD BE A COMPREHENSIVE REDEVELOPMENT OF THE SITE, WHICH SHOULD ALSO MAKE PROVISION FOR PUBLIC OPEN SPACES COMPLEMENTARY TO THE RIVER. IMPROVED ACCESS TO BRIDGE STREET/ONSLow STREET WILL BE ENCOURAGED.

That Paragraph 9.15 be replaced with the following:-

THE BOROUGH COUNCIL CONSIDER THAT THERE SHOULD BE A COMPREHENSIVE REDEVELOPMENT OF THE SITE. DEVELOPMENT SHOULD COMPRISE A HIGH QUALITY ARCHITECTURAL SOLUTION THAT RESPONDS POSITIVELY TO THE COMPLEX CHARACTER OF THE SURROUNDING TOWNSCAPE CONTEXT, SO AS TO ENHANCE THE AREA AND TO INTEGRATE WITHIN THE TOWN CENTRE.

PROPOSAL 99GT2 FORMER FARNHAM ROAD BUS DEPOT

Objectors

<i>Objection 162</i>	<i>St Catherine's Village Association</i>
<i>Objection 486</i>	<i>Mr J W Bannister</i>
<i>Objection 1170</i>	<i>Action</i>
<i>Objection 1400</i>	<i>Bewley Homes Plc</i>
<i>Objection 1436</i>	<i>Environment Agency</i>
<i>Objection 1700</i>	<i>The College of Law</i>
<i>Objection 1783</i>	<i>Consortium of Registered Social Landlords</i>
<i>Objection 1826</i>	<i>National Trust</i>
<i>Objection C235</i>	<i>Cranley Road Area Residents Association</i>

Background, Objections and Issues

9.4.19. The site is currently a car park abutting the western bank of the River Wey immediately to the south of Friary Bridge. In the deposited Plan the Proposal envisaged development with one or more of residential, hotel (preferably with conference facilities) and retail uses. The supporting paragraphs noted that the site was in the River flood plain, and that it adjoined the Millmead and Portsmouth Road Conservation Area. It was also asked that there be a walk and open space on the riverside.

9.4.20. The Objections of Action, Bewley Homes plc, The College of Law and the Consortium of Registered Social Landlords repeated those made in respect of the previous Proposal. The Objections of the Environment Agency and the National Trust were also similar. Others were that the site should be used wholly as a riverside open space and amenity, that offices were an inappropriate use for the site and, conversely, that the Proposal was not representing the full range of uses that would be acceptable.

9.4.21. The main issues to arise were whether the Proposal was properly expressed in relation to the potential of the site.

Consideration

(a) Housing and affordable housing.

9.4.22. Much that was said in relation to the previous site applies also to this one. It is of 0.31ha and falls below the size that would invoke Policy 99H11, unless a development proposing 15 or more dwellings came forward. In that instance the Council would seek to negotiate for a proportion of the dwellings to be "affordable". The Proposal would permit a development wholly of affordable housing, if a developer were so minded.

(b) Provision of open space.

9.4.23. The position of the site argues strongly for a generous part of the riverside to be kept open and appropriately landscaped, as a link between the parts of the riverbank to north and south. The riverside already provides a link between these areas and some modest amenity, valuable for its close proximity to Old Town Bridge and the bottom of the High Street. The Council saw the site as best used by taking advantage of its excellent position in terms of accessibility to make up shortfalls in some town centre uses, such as an hotel or small specialist shops, while maintaining and improving the riverside. The Council proposed adding open space to the list of acceptable uses, although it would appear in the context of a mixed use development.

(c) Hotel use

9.4.24. As in the Proposals above, the site is small for an hotel with conference facilities, but not impractical for hotel use and its situation and convenience could be an encouragement. This is one of several potential sites for an hotel, a need the Plan has recognised. While there may be other options, I do not see hotel use as inappropriate here.

(c) Office use

9.4.25. The Council's proposal to add office use to the acceptable uses was seen by the Cranley Road Area Residents Association as an inappropriate change. Such a development would not be making the best use of a prominent riverside site. I noted that much of the development that has taken place along this bank of the River has been for office use. It may be that the Objectors saw the development in Walnut Tree Close, where the sites are of limited depth, as being so close to the River as to be overpowering, but that need not happen on this site. The advantages of proximity to the railway station for centres of employment, in the interests of sustainability, should not be overlooked.

(d) Other proposed changes

9.4.26. Changes were proposed to the reasoned justification to state in stronger terms the dangers of flooding (Environment Agency), and to draw attention to the objectives for the River Wey and the Guildford and Godalming Navigations in terms of townscape and landscape (National Trust)(PC95 and PC96). Proposed Change 176 would alter the reference to 0.5ha in Paragraph 9.22 to 0.4ha. For the reasons given above, I do not recommend that this change is made.

Conclusions

9.4.27. I understood that this site was in the ownership of the Council. As noted, it is at present a car park. There are constraints on development from its location in the flood plain, but I had no reason to think that it could not be redeveloped in the Plan period. Its retention as open land would provide an opportunity to continue the impression of open land on the river banks so notable to the south, but in these more urban surroundings I do not see the Council's objective of securing open space on the riverside combined with a suitable backing development as wrong. Nor do I see that the opportunity the site provides for "sustainable" development should not be taken.

CHAPTER 9. RECOMMENDATION 3.

- 9.4.7. That PC95 be made.
- 9.4.8. That PC96 be made
- 9.4.9. That PC175 be made.
- 9.4.10. That PC 176 be NOT made.

PROPOSAL 99GT3 BELLERBY THEATRE, LEAPALE LANE

Objectors

Objection 121

Guildford Liberal Democrats

Objection 867
Objection 1401
Objection 1784

The Guildford Society
Bewley Homes Plc
Consortium of Registered Social Landlords

Background, Objections and Issues

9.4.28. This large, rectangular site is in the northern edge of the Town Centre, at present containing a certain amount of open land, used for car parking, the Bellerby Theatre, a Public House, some small workshops and the Youth and Community Centre. It is owned by the Council. The Proposal envisaged residential, community, leisure and office uses and the replacement of the public house. To the east and north it is abutted by residential development.

9.4.29. The last two of the Objections were the same as those made in respect of the earlier Proposals and there is nothing further to add in their respects. Objections specifically to this Proposal were to the inclusion of offices among the acceptable uses, favouring the development for residential and community or leisure uses only, while retaining the present public house. The main issues related to whether the Proposal should exclude offices among the appropriate uses.

Consideration

9.4.30. There was nothing in the Proposal that would prevent the site being developed for residential, community or leisure uses and the retention of the "Live and Let Live" public house. The Plan is aiming at a comprehensive mixed use development that will make the best use of a site that, while valuable as it stands, is substantially underused. The site is on the de facto edge of the Town Centre with offices to the west and south, but residential development to the north and east in Haydon Place and College Road. The present uses of the site and the residential development further north in College Road might suggest that the site was more of the residential area than the commercial.

9.4.31. It is in situations such as this that the absence of a Town Centre boundary causes doubts as to where town centre uses are intended to be located. The Town Centre Parking Boundary includes substantial residential areas which the Council has no wish to disturb. The objectives of sustainability include the location and use of developed land for housing as much as for commercial purposes. While the site may have a history of commercial uses, that was not made clear. It would appear that redevelopment should have the residential and community/leisure uses as its prime uses and offices, which would be likely otherwise to become the main use, as subsidiary only on the frontages to Leapale Lane and College Road.

9.4.32. The wording of the Proposal attracted some criticism. The change suggested by the Council would remove the implication that offices might be the only use of the site (PC97) and is to be welcomed. I considered whether this might be taken a stage further by removing offices from the main list and making them the subject of a separate sentence at the end of the Proposal. However, with the site in the ownership of the Council and to be

subject to a planning brief, I considered that a development substantially for office purposes was unlikely and a further change was not required.

CHAPTER 9. RECOMMENDATION 4.

9.4.11. That PC97 be made.

9.4.12. That PC177 be NOT made.

PROPOSAL 99GT4 TERRITORIAL ARMY CENTRE, SANDFIELD ROAD

Objectors

<i>Objection 608</i>	<i>MOD</i>
<i>Objection 1169</i>	<i>Action</i>
<i>Objection 1402</i>	<i>Bewley Homes Plc</i>
<i>Objection 1785</i>	<i>Consortium of Registered Social Landlords</i>

Background, Objections and Issues

9.4.33. The site, as the site above, is located on the northern edge of the Town Centre, other than to the south adjoined mainly by residential uses. At present it contains buildings once used mainly by the Territorial Army and the Army Cadets, although there was also some community use permitted of the buildings. The Proposal envisages only residential and some community use.

9.4.34. The Objections of Bewley Homes Plc and the Consortium of Registered Social Landlords were the same as in the cases of the previous three Proposals and require no further comment. Action considered that the site should be used for affordable housing. MOD objected to the inclusion of community use in the Proposal. The main issues in this instance was whether the site should be devoted wholly to residential use and the part that affordable housing should take of the development.

Consideration

9.4.35. The site is in an area adjoining the town Centre that is at present largely residential in character. The Proposal and the Objections do not anticipate the spread of commercial uses to this site and this appears an appropriate site on which to seek residential development in an inner urban area with very good sustainability credentials and a suitable environment.

9.4.36. The site at 0.28ha is of less than 0.5ha in area, but if it were assumed that developed would be likely to be towards the upper end of the density range anticipated by PPG3 (30-50 dwellings per hectare) more than 15 dwellings could be provided, the development then coming within the scope of Policy 99H11. A development principally for

affordable housing would not be precluded by the terms of the Proposal, but I accept that this should be a "commercial" decision, not one dictated by the Plan.

9.4.37. While the use of the site by the Territorial Army might in one sense be considered a "community " use, the uses that the Proposal appeared to be seeking to safeguard were the accommodation of the Army Cadets and use of the Territorial Army Hall by local organisations. Policy 99CF2 indicates that the loss of community facilities will be resisted, unless the retention of the building has been fully explored and alternative provision exists.

9.4.38. Looked at in that light, the Proposal appears to reasonably reflect the Council's intentions for the site, although it could be criticised for not being sufficiently precise as to what was in mind in including "some community use". A sense of proportion would be necessary as to what would be required, having regard to the small size of the site, the somewhat adventitious nature of the community use and that community uses are also proposed on the larger Proposal 99GT3 site nearby.

9.4.39. However, considerable progress appeared to have been made in determining the future of the site by the time of the Inquiry. The Army Cadets are to be rehoused on the Queen Elizabeth II Barracks site as part of that redevelopment. A scheme of redevelopment for this site appeared to have been agreed, if not granted planning permission, that would provide 24 flats (4 "affordable") the requirements of Policy 99CF2 having been satisfied to the point that no community provision was required on this site.

9.4.40. I can appreciate that the Council would not wish to alter this Proposal until it was reasonably certain that what was to be achieved here and on the Queen Elizabeth II Barracks site was in accordance with the Objectives of the Plan. However, by the time the Plan is ready for adoption it is to be hoped that these matters will have been satisfactorily resolved and the Proposal can reflect that, either in its omission, or adjustment to remove or define the reference to community use. I recommend only that the Proposal be updated as justified by the circumstances.

CHAPTER 9. RECOMMENDATION 5.

9.4.13. That Proposal 99GT4 be updated to reflect approved development proposals, as required.

9.4.14. That PC178 be NOT made.

5. OPPORTUNITY SITES

PROPOSAL 99GT5 SEEBOARD SITE, WOODBRIDGE ROAD

Objectors

Objection 120

Guildford Liberal Democrats

Objection 1202
Objection 1438
Objection 1701
Objection 1786

National Trust
Environment Agency
The College of Law
Consortium of Registered Social Landlords

Background, Objections and Issues

9.5.1. The site is a large one, of about 2.3ha, located on the banks of the River Wey between the river and Woodbridge Road with the railway to the south. Now largely in employment uses, taken with the adjoining site of Proposal 99GT6, it is prominent at an important entry to the town. Outside any reasonable definition of the Town Centre, the Proposal is for employment with either residential or hotel use. Mention is made of a riverside walk and a useable amount of riverside open space being provided.

9.5.2. The Objections asked for reference in the supporting paragraphs to the importance of the Corridor of the River Wey and Guildford and Godalming Navigations and a firmer statement on the flooding risk. These were proposed to be added by PC98, PC99 and PC179. Other Objections sought a predominantly residential use. The College of Law again commented on the doubt surrounding the availability of the site for hotel use, promoting a site at the College, the Consortium of Registered Social Landlords again raising matters raised in connection with earlier Proposals.

9.5.3. The main issues were whether the Proposal should be changed to reflect a different use pattern.

Consideration

(a) Employment use

9.5.4. The site is at present predominately in employment uses and it is among the objectives of the Plan to retain employment uses where possible. It is noted that the future of the economy will depend mainly on the redevelopment of existing employment land and buildings, this site being now a candidate for the operation of this process (Policies 99E2 and 99E3). Bearing these objectives in mind it would be appropriate to consider that the site should be redeveloped predominantly for employment purposes. I do not, therefore, recommend the change in wording suggested by the Guildford Liberal Democrats.

(b) Residential use

9.5.5. This large site would have the potential to provide a substantial residential development, taking advantage of the environmental potential of the site and its good accessibility. But for the considerations in the previous paragraph, the site, particularly if it were taken with the adjoining land to the north (Proposal 99GT6), could be seen to offer a good opportunity for a substantial housing gain. What the Proposal has in mind as to the amount, location or design of a subsidiary residential use is by no means clear. A comprehensive redevelopment of the site could create suitable residential elements in a predominately employment development, particularly one for Class B1 uses, and contribute

to the improvement of the appearance of the site and opening up the riverside. The very vagueness of the Proposal makes it difficult to criticise mention of residential use, but the Plan could usefully enlarge on the intention in the reasoned justification.

(c) Hotel

9.5.6. An hotel is given as an alternative to residential use, which is a practical approach if the predominant use of the site after redevelopment is to be for employment use. As above, the site could offer an attractive site and an hotel be readily accommodated in a comprehensive redevelopment. The site also has the advantage in its size of allowing for the hotel with conference facilities the Plan is seeking, if at the expense of some employment use.

9.5.7. It was commented by Objectors that the site has many constraints in the way of development. It was by no means clear what the prospects of early development of the site were, having regard to the needs for site assembly, or whether there was any current developer interest. There may also be other constraints, such as its location in the flood plain. However, I see no reason for the Plan not to draw attention to the opportunities of the site. The Plan refers to several sites on which an hotel might be located and doubtless others could be suggested, but that does not depreciate the advantages of this site. As in the case of residential development, the Plan could say more as to the intention of the Proposal.

9.5.8. I suggest in the recommendation a paragraph for inclusion after Paragraph 9.40 and in substitution for Paragraphs 9.43 and 9.44 to give a further explanation of what the Proposal has in mind. It might have the incidental benefit of drawing greater attention to the advantages of redevelopment of the site. The Woodbridge Road Scheme (Chapter 7, Paragraph 7.17) would appear to affect the frontage of the site, and the development to be expected to contribute towards the scheme. If that is the case, the reasoned justification should give it mention.

CHAPTER 9. RECOMMENDATION 6.

9.5.1. That PC99 be made

9.5.2. That PC99 be made.

9.5.3. That PC179 be made.

9.5.4. That a new Paragraph be added to the reasoned justification after Paragraph 9.40 and in substitution of Paragraphs 9.43 and 9.44:-

(9.41). THE BOROUGH COUNCIL CONSIDER THAT THE SITE WOULD BE BEST DEVELOPED COMPREHENSIVELY, HAVING REGARD TO THE POTENTIAL DEVELOPMENT OF THE LAND TO THE NORTH AND TAKING ADVANTAGE OF THE PROMINENCE OF THE SITE AND THE RIVERSIDE LOCATION. RESIDENTIAL OR HOTEL USE SHOULD BE SUBSIDIARY USES,

THEIR EXTENT TO BE DETERMINED IN A PLANNING BRIEF, PROVIDED WITH APPROPRIATE ENVIRONMENTS WITHIN A PREDOMINANTLY EMPLOYMENT DEVELOPMENT. DEVELOPMENT SHOULD BE IN SCALE WITH THE SURROUNDING AREA. IT WILL BE EXPECTED THAT REDEVELOPMENT WILL INCLUDE A RIVERSIDE WALK AND A USEABLE AREA OF OPEN SPACE ADJACENT TO THE RIVER. THE IMPROVEMENT OF WOODBRIDGE ROAD MAY AFFECT THE SITE.

9.5.5. That PC180 be NOT made.

PROPOSAL 99GT6 WOODBRIDGE PARK INDUSTRIAL ESTATE

Objectors

<i>Objections 848, C32</i>	<i>Travers Perkins (CW)</i>
<i>Objection 1437</i>	<i>Environment Agency</i>
<i>Objection 1702</i>	<i>The College of Law</i>
<i>Objection 1787</i>	<i>Consortium of Registered Social Landlords</i>
<i>Objection 1827</i>	<i>National Trust</i>

Background, Objections and Issues

9.5.9. This site is the northward extension of the previous Opportunity site, situated between the River Wey and Woodbridge Road, although excluding land at the junction of Woodbridge Road with Ladymead. The Proposal in this instance is for a predominantly employment development with an hotel. As in the previous Proposal, the Council was looking for a comprehensive development in which there would be a riverside walk and useable open space beside the river.

9.5.10. The land is in the ownership of Travers Perkins who also occupy part of the land as a timber, etc., yard, other employment uses occupying the remainder. They welcomed inclusion of the site as an Opportunity site, but considered that the range of uses proposed was too limited. The Objections of the College of Law, the National Trust and the Environment Agency repeated those made in respect of the previous Proposal. In respect of the Objections of the last two, the Council proposed changes to the reasoned justification (PC100, PC101 and PC181).

9.5.11. The main issue surrounding this proposal was the uses to be accepted.

Consideration

9.5.12. Even more than in the previous proposal, development of this site would allow a considerable visual improvement to be made to one of the main entries to the town. The site would be large enough to accommodate a mix of uses, which could include an hotel with

conference facilities, and provide a development which took advantage of the riverside location. I have noted that the Council has indicated this site and its neighbour as separate "opportunities", but, if there were the prospect of them coming forward together, a comprehensive scheme would probably allow greater use to be made of them both. As it is, it would seem important that with similar objectives the developments are properly coordinated, for which a planning brief could be the appropriate vehicle.

9.5.13. It was apparent that Travers Perkins had an interest in the early development of this land and their main concern was that the uses proposed should reflect its surroundings and its potential. They suggested that the Proposal should permit one or a mixture of uses, which as well as employment would include leisure or a hotel, retail and office uses. The presence of a major retail centre on the opposite side of Ladymead was pointed out, together with the proximity of large office and other commercial development, such as car showrooms.

9.5.14. The Policies of the Plan which seek to retain existing employment land and buildings (Policies 99E2 and 99E3) were mentioned in relation to the previous site. Offices are among the uses defined as "employment" by the Plan and it would not be necessary to add "offices" to the list of acceptable uses. Retail, which it could be assumed would be retail warehouses, a supermarket or similar store would need to meet the sequential and other tests as to location. Here, well outside the functional town centre, I do not consider that the Proposal should appear to pre-judge that outcome. What was meant by "leisure" was not clear. A Multiplex cinema, for example, would also need to be looked at in terms of the sustainability criteria, whereas a health club as part of the hotel complex could be acceptable.

9.5.15. In correspondence the Council indicated that the range of uses given in the Proposal are the preferred uses for the site and that other land uses were not necessarily precluded, although the need to protect the employment use of the site was stressed. This gave the Objectors the reassurance they were seeking. They remained of the view that the Proposal could be more clearly expressed, referring to a suggestion made in a letter of 24 February 2000. I agreed with them on this and while I have not followed their suggestion, I have put forward a new paragraph that might follow Paragraph 9.45 and substitute for Paragraphs 9.47 and 9.48.

9.5.16. The interest of the site owner in early development suggest that the Objections that the site was either unsuitable, or for one reason or another not likely to be available in the Plan period, had less force than possibly in relation to some other sites, but as in those cases, denoting this site for an hotel would not necessarily preclude an hotel on other sites. The Council's proposed change in response to the Objection of the National Trust (PC100), prompted a Counter objection as to the reference to improving public access to the river. The Council suggested adding "where appropriate" to qualify this sentence.

Conclusions

9.5.17. I consider that, bearing in mind the Policies contained in other Chapters of the Plan, particularly for the protection of employment land, the Plan goes as far as it reasonably can in proposing use only for employment and an hotel. That the employment use should

predominate is not unreasonable, but it would meet one of the site owners requests to allow for offices. Retail and leisure are not uses that to my mind should have the appearance of being acceptable on the site, even if the Council might be prepared to consider such uses on their merits. As in the previous Proposal, the Woodbridge Road Scheme would appear to affect the site and if that is so it should be mentioned in the reasoned justification.

CHAPTER 9. RECOMMENDATION 7.

- 9.5.6. That PC100 be made, with the addition after "IMPROVE PUBLIC ACCESS" of "WHERE APPROPRIATE".
- 9.5.7. That PC101 be made.
- 9.5.8. That PC181 be made.
- 9.5.9. That the following paragraph be added after Paragraph 9.45, in substitution for Paragraphs 9.47 and 9.48.:-

(9.46). THE BOROUGH COUNCIL CONSIDER THAT THE SITE WOULD BE BEST DEVELOPED COMPREHENSIVELY, HAVING REGARD TO THE POTENTIAL DEVELOPMENT OF THE LAND TO THE SOUTH AND TAKING ADVANTAGE OF THE PROMINENCE OF THE SITE AND THE RIVERSIDE LOCATION. EMPLOYMENT SHOULD BE THE PREDOMINANT USE BUT AN HOTEL WOULD BE AN ACCEPTABLE SUBSIDIARY USE, AS MIGHT OTHER USES, DEPENDENT ON THEIR SCALE AND CONFORMITY TO THE POLICIES OF THE PLAN AND THE OBJECTIVE OF SUSTAINABILITY. A PLANNING BRIEF WILL BE PREPARED FOR THE SITE AND ITS NEIGHBOUR. DEVELOPMENT SHOULD BE IN SCALE WITH THE SURROUNDING AREA. IT WILL BE EXPECTED THAT REDEVELOPMENT WILL INCLUDE A RIVERSIDE WALK AND A USEABLE AREA OF OPEN SPACE ADJACENT TO THE RIVER. THE SITE COULD BE AFFECTED BY PROPOSALS FOR THE IMPROVEMENT OF WOODBRIDGE ROAD.

PROPOSAL 99GT7 FARNHAM ROAD HOSPITAL

Objectors

Objection 1703
Objection 1788

The College of Law
Consortium of Registered Social Landlords

Background and Objections

9.5.18. The former County Hospital is in a predominately residential area on the rising land to west of the Town Centre. The handsome buildings, some listed Grade II, others on the local list, remain in Health Service use, some of the buildings apparently in residential occupation.

9.5.19. The Proposal suggests that the listed buildings be kept, and their setting, along with the amenity of nearby residents, protected. The proposed uses are residential and/or an hotel and community uses.

9.5.20. The Objections raised similar matters in relation to the provision of affordable housing and the use of the site for an hotel as were raised in connection with the earlier Proposals. As was said before, the provision of affordable housing is guided by Policy 99H11 of the Plan. Development on this site, of 2.59ha in total, would be likely to come within the scope of that Policy, which is designed to achieve a reasonable contribution from normal development sites. Neither the Policy nor this Proposal would preclude the whole of the residential development being for affordable housing, should a housing association or other provider be the developer, nor a proportion of more than 30% being negotiated with a willing developer.

9.5.21. I was uncertain as to whether the Health Service saw the Hospital as redundant and therefore as to the likely timescale of redevelopment. At present it appears underused. Its location and the quality of the buildings would not preclude use for an hotel and, as in the other instances in which Proposal sites have been seen to be suited to meet an acknowledged need in Guildford, mention of this site does not prevent other sites from being considered. The hotel is put forward as an alternative, or as an element of a mixed use scheme.

9.5.22. The Council proposed only one change to this Proposal. That concerned the brief summary of affordable housing policy given. Not featuring in the Policy from which the summary was taken, I do not suggest that this change be made.

CHAPTER 9. RECOMMENDATION 8.

9.5.10. That PC182 be NOT made.

POLICY 99GT8 LADYMEAD FIRE STATION

Objectors

Objection 520
Objection 871
Objection 1409
Objection 1789

Guildford Diocesan Board of Finance
The Guildford Society
Surrey County Council
Consortium of Registered Social Landlords

Background, Objections and Issues

9.5.23. The site is located prominently on the southern side of Ladymead at the corner of Stoke Road, adjacent to the junction by which traffic enters and leaves Guildford from the A3. Ladymead contains a mix of mainly modern commercial development, including on the opposite side to the site an hotel, two large office developments (immediately facing the site), a petrol filling station, a pumping station and a large retail centre. The southern side of Ladymead is less conspicuously commercial, including some residential development, while to the south of the site is an area that is predominantly residential.

9.5.24. The site at present includes the Fire Station and ancillary residential accommodation, but a large part is open. To the south a graveyard and relatively low intensity development adds to the open impression, continuing that of Ladymead/Parkway further east and of the northern part of Stoke Road.

9.5.25. The Plan as deposited envisaged a comprehensive development of the site for residential use. Policy 99CF2 would be invoked in relation to the need to replace a community use and, having an area of about 1.06ha, Policy 99H11 in respect of affordable housing.

9.5.26. The Objection of the Consortium of Registered Social Landlords repeated that made earlier and was considered in relation to other Proposals. Other Objectors were primarily concerned that the site should be identified for more than residential use, an hotel, offices and car showrooms being variously proposed. It was also noted that land to the west of the site, partly residential and partly the yard and offices of a marquee hire firm, could be added to the site, while circumstances could dictate that the Fire Station would not be relocated and only a partial redevelopment would be possible.

9.5.27. The main issues to emerge were whether further, commercial, uses should be added and recognition be given to the possible extension of the site and the comprehensiveness of development.

Consideration

9.5.28. Ladymead, at least on its northern side, is now a considerable commercial centre, at some distance from the Town Centre proper and to my mind difficult to describe as a part of its functioning. The main station and the bus station are more than 1km away, separated by a largely residential area.

9.5.29. The frontage to Ladymead is commercial and different in character to its immediate hinterland, although on the southern side this is more a reflection of the busy and environmentally unfriendly road itself than the pattern of use. The site is of a size that would permit a residential development, which could have reasonable amenity and, in view of the residential area to the south, would not be inappropriate. The Council proposed that an hotel be added to the acceptable uses (PC102) and the site, having prominence at a gateway to the town, could encourage such a use.

9.5.30. The Ladymead area has a measure of services of its own, not least in the Retail Centre, and bus services, principally on the radial routes, but, as it stands, I doubted that the site would have the facilities, or convenient bus and rail services to allow it to be considered truly sustainable in transportation terms, whether as a transport node or as a movement corridor. Its good accessibility to the car was not matched by its accessibility by public transport. I could accept that car parking could be restrained and an office development might provide the resources to improve access by means other than the car to a point that would make the site acceptable for a traffic generating use such as offices, but that remained uncertain. The Plan was looking essentially for high traffic generating uses to be located in the Town Centre, rather than in a location that was at best peripheral and in its development for commercial purposes was perhaps reflecting a now outdated thinking.

9.5.31. The Council pointed out that there was enough employment land and buildings available or allocated to meet the needs of the local economy in the Plan period, including land in the Town Centre. The Council accepted in relation to other Proposals that uses beyond those mentioned in the Proposal itself could be considered. That would be true of offices on this site, but I did not see it as reasonable to open this site to a substantial office development of doubtful sustainability and unnecessary in terms of the land provisions of the Plan.

9.5.32. The case for adding car showrooms was also argued. There are car showrooms in Ladymead at the junction with Woodbridge Road. They are, however, in a context of wholly commercial frontages. My feeling was that, apart from any traffic difficulties that might arise, they would be incongruous here and difficult neighbours to the preferred uses. I did not see that they should be added. The Council did not enlarge upon the way they saw the policies for protection of community facilities working in relation to the site, although it was clear that the instigation of the Proposal came from an intention to consider relocating the Fire Station, to a more convenient site.

9.5.33. I saw no objection to extending the site to include the properties to the west, accepting that they were in different ownership. These sites clearly had a potential for redevelopment which their shallow depth would make difficult if approached independently. That the Fire Station might not be relocated and only the western part become available would limit the possibilities of the site, although a partial redevelopment could favour as the Council's suggested, uses above those of offices or car showrooms. The more restricted frontage would, however, offer fewer options for an appropriate design solution.

Conclusion

9.5.34. In my view, at this stage the case was not made that the Plan should countenance the use of this substantial site in this out of centre location for a major employment generating use such as offices. While there were arguments in its favour, the balance of the sustainability case was against it. From a different viewpoint, I did not see car showrooms as appropriate in use terms, or in relation to the character of this part of Ladymead. The only addition to the Proposal that I support is that of an hotel as an alternative to residential use.

CHAPTER 9. RECOMMENDATION 9.

9.5.11. That PC102 be made (addition of hotel).

9.5.12. That the Proposal be changed to include the wedge of properties to the west.

9.5.13. That PC183 be NOT made.

6. MAJOR APPROVED DEVELOPMENT SITE (ST DOMINIC SQUARE)

Objector

Objection 1486

Mr V J Underhill

9.6.1. The Section referred to the St Dominic Square development, for which planning permission had been granted and the Plan contained no specific Policy or Proposal. The development approved would contain a substantial area of retail floorspace and 31 residential units. It would also contain various leisure and food and drink premises and these were the subject of Mr Underhill's concern.

9.6.2. Mr Underhill pointed to the increase in the number of pubs and clubs in the Town Centre in recent years and the changes in character of many of those already existing. This, he felt, was changing the character of the Town Centre as a whole and making it less friendly for the family after the main shopping hours. There was an escalation of incidents of crime and violence, often drink related, which were a disincentive to visiting the Town Centre at night for eating out or entertainment. The need was for fewer such establishments and for more open spaces in the town.

9.6.3. One can sympathise with Mr Underhill. The trend is not confined to Guildford and similar complaints can be heard in many towns, large and small. Whether it will be a continuing trend is difficult to predict, but the Council noted that applications for Class A3 uses had diminish in the last year or two. Guildford has a wide variety of entertainment and other facilities likely to attract people to the Town Centre in the evening and in general to appeal to a wide section of the local population, not just the young. The advice, of PPG6 for example, has been to encourage the use of Town Centres outside normal shopping hours as a support to their overall vitality and viability. Changes to the Use Classes Order have further encouraged this. The best that can be said to Mr Underhill is that the more people that are attracted and the wider the age spread and interest, the fewer are likely to be the problems and the greater the atmosphere of security.

9.6.4. As far as the Plan is concerned, the Shopping Policies impose some control on the location and perhaps more importantly to limit or guide the concentration of Class A3 uses. The Plan is also seeking to maintain or increase the resident population of the Town Centre. Clubs do not come within this Use Class and at the application stage are controllable on an individual basis, having regard to the General Policies of the Plan. The St Dominic

Square development having been granted permission, there is effectively nothing the Plan could now do about the use pattern approved.

7. ADDITIONS TO DEVELOPMENT OR OPPORTUNITY SITES

1. GUILDFORD RAILWAY STATION

Objectors

<i>Objection 557</i>	<i>Mr I C Macpherson</i>
<i>Objection 1105</i>	<i>Cranley Road Residents Association</i>
<i>Objections 1523, C14</i>	<i>Railtrack Plc</i>
<i>Objection C4</i>	<i>The Guildford Society</i>
<i>Objection C148</i>	<i>CPRE Surrey</i>

Background, Objections and Issues

9.7.1. Guildford Railway Station is on the western edge of the Town Centre, well used to serve the Centre as well as being a major transport interchange. There has been some development on land which at one time appeared to form part of the railway in the vicinity of the Station and the main station building itself is modern.

9.7.2. Railtrack pointed to the opportunity the Station offered to carry out development appropriate to the Town Centre and improvements to the interchange, supported by other Objectors who made much the same point. The Council accepted that the site should be included as an Opportunity Site, Proposed Change 92 suggesting a wording for the Proposal and for the reasoned justification. The uses suggested were:-

"offices, residential, hotel, station related retailing and improved transport interchange facilities to include existing levels of dedicated commuting parking".

9.7.3. The outstanding issues were whether the uses proposed covered all that would be appropriate.

Consideration

9.7.4. There was no timing offered for the possible development of the Station and it would not seem appropriate to regard this site as more than an Opportunity Site. However, it meets most if not all of the criteria for sustainability and if there is a prospect of its development in the Plan period inclusion of a Proposal is justified.

9.7.5. The site would be suitable for a variety of uses, having regard to its location. There was a suggestion that it would be suitable to take part of the expansion of the University of Surrey and this was discussed at the Inquiry. If expansion on to Manor Farm were not practical, or the University accepted the option pressed by many Objectors that sites should be sought in the town, this would be a candidate site, being within walking distance of the main campus. I have not gone along with that strategy, but the Proposal for this site

put forward by the Council would not preclude use by the University, if the dispersal option proved a more practical course.

9.7.6. The Council was understandably reluctant as to the retailing that might take place on this site. It is separated from the main shopping frontages, which do not extend to the west of the River. The possibility that the site might accommodate a major food store was, however, seen as an option and I agree that the Proposal should allow for this possibility. The Council suggested a further change to the wording of the Proposal (PCX5/7) to substitute for "Station related retailing" retailing (predominantly food retailing) and leisure uses". Additions were made to the reasoned justification to draw attention to the need to take account of development in this location on the vitality and viability of the Town Centre.

9.7.7. CPRE Objected that the uses did not include a canteen for travellers. I was uncertain as to what they had in mind, the Station offering a variety of refreshment facilities, which it would doubtless continue to provide. I did not see that this required specific mention.

9.7.8. Development of the Station would offer encouragement to two projects in its vicinity, improved pedestrian and cycle links to the Town Centre and the alternative road link to the Station. Both are mentioned in the reasoned justification. For the first, a scheme of development could offer a good opportunity for its realisation. For the second, Policy 99M2 is concerned with safeguarding an alternative road link from Walnut Tree Close to the Station. The representations on behalf of Railtrack included what could be seen as an Objection to this proposal, which being out of time I have not formally considered. There was, however, mention of consultants being instructed to consider access matters in connection with the Station, perhaps rejecting the link, and this could be taken into account should it be decided to review the Walnut Tree Close proposals. As far as this Proposal is concerned, the implementation of Policy 99M2 is not presented as a prerequisite of development.

Conclusion

9.7.9. I consider that the additions should be made to the Plan in the terms of the Council's Proposed Change, amended as the Council suggested.

CHAPTER 9. RECOMMENDATION 10.

9.7.1. That PC92 be made (inclusion of a new Proposal in Section 5 Opportunity Sites), with the following changes:-

- (i) In the Proposal for "STATION RELATED RETAILING" substitute "LEISURE AND RETAIL (PRIMARILY FOOD)".
- (ii) Add to the reasoned justification:-

"ANY PROPOSAL FOR RETAIL DEVELOPMENT WOULD NEED TO DEMONSTRATE THAT THERE WILL BE NO

DETRIMENTAL IMPACT ON THE VITALITY OR
VIABILITY OF THE TOWN CENTRE."

2. FORMER ODEON CINEMA AND PRUDENTIAL BUILDINGS, EPSOM
ROAD.

Objector

Objection 534

Prudential Portfolio Managers

9.7.10. The site is at the corner of Epsom Road and High Street, bounded to the west by Jenner Road and to the south by Sydenham Road. The site has an area of about 0.29ha. At present there are shops with offices above on the eastern part of the Epsom Road frontage, most of the remainder of the site being occupied by a redundant cinema.

9.7.11. The site was put forward by the Objector as an opportunity to provide a new development of mixed uses, principally shops, offices and flats, but also Class A1 and A3 and Class D1 uses. The Council supported the identification of the site as an Opportunity Site and the mix of uses suggested.

9.7.12. While towards the north western edge, the site is within the Town Centre and its frontage to Epsom Road is defined as a Tertiary Shopping frontage. By definition it could be expected to have considerable advantages in terms of sustainability and I noted that it is at least in part in an employment use. I had no reason to question the Council's acceptance of the site or the uses proposed. The recommendation contains the wording for the Policy and the reasoned justification put to me.

CHAPTER 9. RECOMMENDATION 11.

9.7.2. That a further Proposal be added to Section 5 Opportunity Sites as follows:-

PROPOSAL 99GTX - FORMER ODEON AND PRUDENTIAL
BUILDINGS, EPSOM ROAD

PLANNING PERMISSION WILL BE GRANTED FOR A
COMPREHENSIVE MIXED USE REDEVELOPMENT OF THIS
SITE FOR THE FOLLOWING USES:

RESIDENTIAL
RETAIL
OFFICES
FOOD AND DRINK (CLASS A3)
ASSEMBLY AND LEISURE (CLASS D2)
FINANCIAL AND PROFESSIONAL SERVICES

Reasoned justification

THE SITE IS BOUNDED BY EPSOM ROAD, SYDENHAM ROAD AND JENNER ROAD.

THE SITE CURRENTLY COMPRISES THE FORMER ODEON CINEMA AND MIXTURE OF CLASS A (RETAIL) USES ON THE GROUND FLOOR WITH OFFICES ON THE THREE UPPER FLOORS.

THE SITE LIES CLOSE TO THE EXISTING DWELLINGS ON SYDENHAM ROAD. ANY REDEVELOPMENT SHOULD NOT HAVE A DETRIMENTAL EFFECT ON THE AMENITIES OF NEARBY RESIDENTS.

POLICY 99H11 - AFFORDABLE HOUSING, REFERS TO NEGOTIATIONS WITH DEVELOPERS ON ALL HOUSING DEVELOPMENTS OF 15 OR MORE DWELLING, OR RESIDENTIAL SITES OF 0.5 HECTARES OR MORE IRRESPECTIVE OF THE NUMBER OF DWELLINGS. WHILST THE SITE IS ONLY 0.24 HECTARES THE NUMBER OF RESIDENTIAL UNITS MAY BE ABOVE 15, IN WHICH CASE THE BOROUGH COUNCIL WILL NEGOTIATE FOR THE PROVISION OF SOME AFFORDABLE HOUSING.

THE SITE LIES WITHIN GUILDFORD TOWN CENTRE AND PROVISION OF PARKING SPACES ON ANY REDEVELOPMENT SHOULD BE IN ACCORDANCE WITH POLICY 99G1(1).

THE SITE LIES WITHIN AN AREA OF ARCHAEOLOGICAL POTENTIAL. ANY DEVELOPMENT WILL HAVE TO BE ACCOMPANIED BY AN ASSESSMENT OF THE ARCHAEOLOGICAL VALUE OF THE SITE.

THE SITE IS IN A PROMINENT LOCATION WITHIN A CONSERVATION AREA AND THE COUNCIL HAS THEREFORE ADOPTED A DESIGN GUIDANCE STATEMENT FOR THE SITE THAT WILL BE TAKEN INTO CONSIDERATION WHEN ASSESSING ANY REDEVELOPMENT PROPOSALS.

THE BOROUGH COUNCIL CONSIDERS THAT THERE SHOULD BE A COMPREHENSIVE PLAN FOR THE REDEVELOPMENT OF THE SITE. DEVELOPMENT SHOULD BE IN SCALE WITH THE SURROUNDING ENVIRONMENT.

CHAPTER 10. RURAL ENVIRONMENT

1. INTRODUCTION

10.1.1. The Chapter includes the Policies concerned with the rural parts of the Plan area. Much of the Plan area is in the Metropolitan Green Belt, most of the villages being "washed over". Parts of the Green Belt are also designated as an Area of Outstanding Natural Beauty or an Area of Great Landscape Value. The countryside beyond the Green Belt is also proposed to be protected by the Plan, part of this being in the Blackwater Valley Policy Area. In the areas of National designations, such as the Green Belt, the Plan follows National guidance. In general, the approach is of restraint on inappropriate new development in the countryside and the rural settlements, while supporting agriculture, the rural economy and rural communities.

10.1.2. A large body of the Objections to the Chapter related to the way that the Plan was following the advice in relation to the Green Belt given by PPG2, in its broad interpretation and, in so far as policy boundaries were drawn for the larger villages, where those boundaries were drawn. A number of Objections related to the failure of the Plan as deposited to identify Major Development Sites in the Green Belt, described in Annex C to PPG2. These and other matters raised in the Objections are considered in relation to the individual Sections and Policies.

Objectors to Section 1, Introduction

Objection 1656/7
Objection 1887

Country Landowners Association
CPRE Surrey

Consideration

10.1.3. The three Objections to the Introduction raised somewhat different points of omission. The first of the Country Landowners Association's Objection related to the need to add to Paragraph 10.2:-

"In particular CAP has and continues to change the role of agriculture ... and landowners are increasingly having to diversify their activities, including considering alternative uses for their land and buildings ... etc."

10.1.4. I considered that the second sentence of the Paragraph substantially said that already and, the changes to the rural economy being not entirely related to CAP, this comment would tend to limit rather broaden the application of the Paragraph to the Policies which follow.

10.1.5. The second of the Objections referred to Paragraph 10.4, and suggested qualifying the brief summary of policy for the Green Belt given in the penultimate and final sentences by saying that

"sensitive development in the rural areas will be justified where economic and social issues can be balanced with the need to protect and enhance the rural landscape ...".

This, it was thought, would present a better integrated introduction to the Objectives.

10.1.6. The Council pointed out that this went beyond what was said in the advice and should not, therefore, be included in the Plan, with which I agree. The advice defines closely the development that is appropriate. Inappropriate development is by definition harmful to the Green Belt. There may be very special circumstances to justify inappropriate development, but they are unlikely to be circumstances which could be defined in advance in the Plan. In the Countryside Beyond the Green Belt Policy area the advice is less categorical, but the intention remains to protect the countryside for its own sake and to resist built development, except in circumstances not dissimilar to those applying in the Green Belt. In practice, in both policy areas it may be possible to go some way to permit the sorts of development the Objectors have in mind - several Policies in this and other Chapters of the Plan are concerned with economic and housing matters in the rural areas - but not to the full extent of what might be conjectured to be the objective.

10.1.7. CPRE wished to add a final sentence to Paragraph 10.4 "A particular concern will be the prevention or reduction of traffic along unsuitable rural roads". As a sentiment this is a part of the aim of the Plan towards sustainability as well as a reasonable road safety objective. The Movement Chapter and the Local Transport Plan look to these directions. In this Chapter there are no Policies with this as their prime or even secondary objective and there would seem to be little advantage in including the comment.

2. OBJECTIVES

Objectors

Objection 1658
Objection 1888

Country Landowners Association
CPRE Surrey (CW)

10.2.1. In this Section, the Country Landowners Association was asking for an additional objective to provide for an integrated land policy for the countryside which would deliver accessible affordable housing, employment and services. My view has to be that, within the limits of National policy, such as that for the Green Belt, and what is properly included in the Plan, an integrated land policy is what the Plan is setting out to provide. It is supported by other policy areas of the Council and other bodies and by the Local Transport Plan. Whether the Plan could better express this particular objective was a matter to consider. If so, it would probably be best included among the aims of Chapter 3, Strategy, but looking at those aims, to include a specific aim related to achieving a comprehensive approach to one part of the Plan area - the rural areas - would seem to repeat what is said in the present more broadly directed aims rather than add to them. It was not my view that it was necessary to include a further objective here.

10.2.2. CPRE asked for the deletion of "best and most versatile" from the second objective, the protection of agricultural land. I could appreciate that CPRE might want to

protect all agricultural land, not simply that of the higher grades in the agricultural land classification. However, the phrase reflects a particular aspect of National policy set out in PPG7 and other places, that even when considering other uses that might be appropriate in rural areas, the best agricultural land should be regarded as a special and finite resource to be protected. Such proposals, if they are otherwise acceptable, should be directed to land of lesser value. I, therefore, saw the purposes of the second and third objectives as somewhat different, the third directed to protecting open land in general.

3. SUPPORTING MEASURES

10.3.1. The Section gave rise to no recorded Objections.

4. GREEN BELT POLICIES

10.4.1. The Policies of this Chapter were not presented in topic or other Sections. This is not a criticism, nor a suggestion that some division of the Policies should be made. I have made a division, however, for the ease of presenting the Report.

POLICY 99RE1 EXTENT OF THE GREEN BELT

10.4.2. The Metropolitan Green Belt is now long established and as it effects Surrey, the approved Structure Plan denotes its general extent in Policy PE1 and the Key Diagram. The adopted local plan defines its boundaries. PPG2 contains the National advice relating to Green Belts and in relation to the definition of boundaries it makes the points that:-

- (i) Once the general extent of a Green Belt has been approved it should be altered only in exceptional circumstances; and
- (ii) Where existing local plans are being revised and updated, existing Green Belt boundaries should not be changed unless alterations to the Structure Plan have been approved, or other exceptional circumstances exist, which necessitate such a revision.

10.4.3. The Council proposed only one change to the boundary in the Plan, taking land at Manor Farm out of the Green Belt to accommodate expansion plans of the University of Surrey. Objections to that proposal are considered in relation to Chapter 16, including the Objections made to that Proposal under this Policy:-

Objection 589
Objection 1889

Miss M C Usher
CPRE Surrey

10.4.4. The Objections were concerned not with the merits of having the Green Belt or of this Policy, which attracted considerable support, but, apart from the two Objections mentioned above, and some points raised in relation to Paragraph 10.8 of its reasoned justification, with proposing further changes to the Green Belt boundary to exclude particular areas of land. These are considered individually, although in relation to these proposals the two points made above guide the issues to be considered, along with my conclusion from

Chapter 5, Housing, that there is no requirement to allocate further land for housing for the Plan period.

- (a) Cattershall site, Godalming

Objection 142

Standford Properties Ltd (H)

10.4.5. The Objections relating to this site were considered in relation to Policy 99H2. My conclusion was that there was no need to allocate this land for development. There were not circumstances in this or other respect that would justify removing this land from the Green Belt.

- (b) Ruston Cottage, Eashing Lane, Milford

Objection 635

Mr and Mrs Comley

10.4.6. Ruston Cottage is situated on the northern edge of Milford, the land concerned in the Objection forming part of the grounds. Milford is "washed over" by the Green Belt, the greater part of the village being in the neighbouring Waverley Borough Council's boundaries. The current local plan for Waverley does not define settlement boundaries, although I understood that there was to be a settlement boundary defined for Milford at the forthcoming review.

10.4.7. It would not be in accordance with the intentions for defining the Green Belt to actually remove the designation from a small site in the heart of the defined area such as this and I have regarded the intention of the Objection to be to include the land within a settlement boundary, which would allow the modest development mentioned by the Objector, two houses served from Chapel Lane.

10.4.8. The criteria used for the definition of settlement boundaries in the Plan are given in the Topic Paper Identified Settlements in the Green Belt (CD16). I would expect those used by Waverley Borough Council to be similar. As I understood it, the settlement boundary for Milford would take in the quite closely spaced modern development of Chapel Lane, but applying the criteria of either Plan it would not include Ruston Cottage and the Objection site.

10.4.9. Having regard to the criteria for definition of the boundary, the site and the neighbouring houses can be described as a "loose knit" group, even if they are on the edge of a more compact settlement. The boundary is seeking not so much to define the settlement in a social or community sense as to draw a policy area in which the opportunities for further development are limited to those that will not damage the objectives of the Green Belt, in this instance essentially that of preserving its openness.

10.4.10. I do not, therefore, consider that the Plan should extend the settlement boundary for Milford to include this land. I noted that the Objection related also to the extent of the Area of Great Landscape Value. That, too, is a designation drawn from the Structure Plan for which the Plan must define a boundary. In taking in the open land to the north of

Milford, including this area of low intensity development, I did not see that it had been drawn incorrectly.

(c) Gosden Hill Farm, Guildford

Objection 1085

Mr E Wye

10.4.11. The Objection was wide ranging, but for the purposes of this part of the Plan related principally to the opportunities there could be in housing and highway terms if the Green Belt designation were removed from Gosden Hill Farm, permitting development to take place on the eastern side of Guildford. I did not see it to be my place to comment on the matters raised concerning the broader effects of Green Belt policy on the National economy.

10.4.12. At the more local level, I could see that the construction of a road along the eastern side of Guildford could have some traffic benefits and that permitting development could be a way of achieving such a route. Urban extension can be a way of providing for housing needs sustainably, if there are no better options available. For the Plan period, there is no need to identify further land for housing and the road proposal did not figure among those put forward by the highway authorities for definition or safeguarding.

10.4.13. It may be that at some future time, if there were need to locate substantially more housing land on green field sites, this could be among the options. However, I would expect it to go through the normal process of first the identification of the need and of the land to be taken from the Green Belt through the Structure Plan and only then for it to be taken into the Plan. At this stage I do not see that the land concerned can be taken from the Green Belt, nor the route of the suggested road safeguarded.

(d) Land north of Slyfield Industrial Estate, Guildford

Objection 1393,1396

Wildbrook Properties Ltd

10.4.14. The Objection related to land to the north of the Slyfield Industrial Estate extending into the open area between the Estate and the nearby settlement of Jacobs Well. Proposed as an extension to the Estate, the Objections were considered in Chapter 6, Employment. I saw no need to take this land into the Industrial Estate, and considered that extension of development of the Estate could be seriously damaging to the separation between Guildford and Jacobs Well.

10.4.15. It may be that in this area the Green Belt is primarily serving a more local function in preventing coalescence between Guildford and its smaller neighbour, but in doing so it is performing the broader purposes of the Metropolitan Green Belt for which the land requires to be kept essentially open. If in future there were a need to further extend the Slyfield Industrial Estate and this were the only direction in which that remained practicable, as in the case above, it would be expected that the need and the location would be first identified in the Structure Plan.

(e) Land at Liddington Hall Farm, Guildford

Objection 1419

Merrist Wood College (H)

10.4.16. Liddington Hall Farm is on the northern edge of Guildford, farmland used by the nearby Merrist Wood College, but now surplus to their requirements. The land, extending to about 28ha, adjoins the main built up area of the town to the east, but has lesser areas of development to the north and west and penetrating into it from the south.

10.4.17. I have earlier indicated that I do not see a requirement to identify further land for housing for the Plan period. I, therefore, see no exceptional circumstances that would justify removing this land from the Green Belt. The question arose as to whether it might be made "safeguarded land", to meet needs in future plan periods. I noted its general situation in relation to the urban area, the relatively poor quality of the land and that it had been considered for the expansion of Guildford in the early 1980s. At present, however, it is not clear what the future requirements for housing growth for Guildford will be.

10.4.18. In the present climate, if a requirement were to arise, being green field, the land would not be the first choice and there would be a need to evaluate the contribution to new housing that could be expected from the present built up area through an urban capacity study. It would be expected that the quantification of the housing requirement and the strategy by which it was to be met would be first determined through the Structure Plan. Only once that were done and, through the sequential test, a need established to seek further greenfield sites, would it be appropriate to consider the removal of the land from the Green Belt, whether for development, or reservation as "safeguarded land" for possible use in a future plan period.

(f) Land at Keens Lane, Guildford

Objection 1455

The Shepherdsmead Trust

10.4.19. The Shepherdsmead Trust is a long established Christian Church in Guildford, closely related to other Congregations in the area. At present it occupies premises in Shepherds Lane, Stoughton, premises in the heart of the urban area where there is no longer space to expand to accommodate the needs of the growing congregation. The Trust had purchased land on the edge of the urban area at Keens Lane - a broadly triangular site of about 0.9ha, bounded by Keens Lane and Tangle Lane - at present used for grazing, but including at one side a number of huts, seemingly stables. Keens Lane formed the boundary of the main urban area, but there were houses facing the land in Tangle Lane and several houses were lapped round by the site in both the Keens Lane and Tangle Lane.

10.4.20. The Trust had made a number of Objections relating to different Policies of the Plan which they saw as obstructive or insufficiently supportive of their ambitions to build new meeting rooms as an addition to or in replacement of their present premises. Particularly, the root of their problems had been seen to be the omission from PPG2 of the earlier concession that institutions in large grounds could be seen as appropriately located in the Green Belt. In their belief, this would have enabled development of the site they had

acquired. They had, however, been refused permission on Green Belt grounds. Hence, one of the solutions seen would be to remove the site from the Green Belt and incorporate it in the urban area.

10.4.21. I can sympathise with the Trust's predicament, and accept that the functioning of the Church could be much improved if they had larger premises with more car parking. There are arguments considered elsewhere as to whether the Plan could or should do more specifically for places of worship. In so far as this Policy is concerned, there being no alteration to the boundary proposed by the Structure Plan, I accept the Council's view that the circumstances are not so exceptional as to justify removing the site from the Green Belt.

(g) Land north of Tannery Lane, Send

Objection 1605

RMC Properties Ltd

10.4.22. The site is on the northern edge of Send, between Tannery Lane and the River Wey Navigation. It comprises about 7ha of land at one time worked for minerals, but now restored to agricultural use. Much of the land in this part of the Wey Valley has been worked for minerals, some of it restored as agricultural land, other areas remaining as standing water. Send is "washed over" by the Green Belt designation, although a settlement boundary is defined which abuts the south western side of the site.

10.4.23. The removal of this land, and other former minerals working sites, from the Green Belt is not in my view required in order to provide further housing land for the Plan period, nor is it anticipated by the Structure Plan. Whether there would be a need in future Plan periods cannot be said at this stage, but again removal of the land from the Green Belt for development, or for denoting as "safeguarded land" for future Plan periods, would be a process to be instituted through the Structure Plan. It should be borne in mind that, having been restored, the site is no longer "brownfield". Although adjoining the village, which has some modest sustainability credentials, a proposal for the development of so large a site would require consideration of matters of sustainability and the application of the sequential test before the land were selected even for some future housing need.

10.4.24. The site is open land, clearly separate from the built up area of the village. Having regard to the criteria of CD16, there would be no justification for including the site in the village envelope. In my view there are no grounds for removing the site from the Green Belt, or for extending the settlement boundary to take it, or any part of it, into the village.

(h) Land at Heath Farm, south of Tannery Lane, Send

Objection 1606

RMC Properties Ltd

10.4.25. The Objection relates to about 2ha of land to the south east of Tannery Lane, extending behind houses in Send Road. The site is currently a vineyard.

10.4.26. The site, though smaller and virgin land, is in much the same situation as the previous site, Green Belt land adjoining the settlement boundary of Send. There is no requirement to allocate more housing land for the Plan period, no suggestion in the Structure Plan that land should be removed from the Green Belt in this area and nothing about the site that suggests that it meets the criteria for inclusion in a settlement boundary.

- (i) Land north of Send Marsh Road, Send

Objection 1607

RMC Properties Ltd

10.4.27. This site is of about 1.8ha, located to the north of Send Marsh Road, abutting the north eastward extension of the built up area of the village in Send Marsh Road. The site is close to and in terms of the planning considerations the same as the site above. As in that case, in my view there is not sufficient reason to remove the site from the Green Belt, or to extend the settlement boundary of Send to take it, nor a part of it into the village.

- (j) Land east of Polesdon Lane, Send Marsh

Objection 1608

RMC Properties Ltd

10.4.28. The site is a field of about 2.8ha on the northern edge of Send Marsh. It has access from Polesdon Lane but no road frontage. A former depot on the opposite side of Polesdon Lane has been developed in the last few years for housing and an adjoining site for employment use. Beyond the site former mineral workings are now a recreational area.

10.4.29. The considerations in this case repeat those of the cases above. There is no need nor justification to remove the land from the Green Belt at this time, nor to extend the settlement boundary to the site.

- (k) Land west of Polesdon Lane, Send Marsh

Objection 1609

RMC Properties Ltd

10.4.30. The Objection related to land that is currently allotment gardens, extending to about 0.6ha. Approached from Polesdon Lane, modern housing development adjoins to the south and a small employment development to the east between the site and the Lane.

10.4.31. The considerations relating to removing land from the Green Belt gone through in relation to the sites above apply equally here. This land does not adjoin the settlement boundary defined for Send Marsh, which extends northwards a little beyond Send Marsh Road. Although there is modern development adjoining the site, and it may be arguable that the settlement boundary should extend to include it, the sparser development to the north and west of the Green is reason to consider an extension with caution. It could open too large an area for development, having regard to the purpose of defining settlement boundaries. Again, in policy rather than structural terms, there would seem little to be gained by including the Marlborough Gate development as an outlier of the settlement defined. This modern development has left little room for infilling of the nature Policy 99RE3 permits.

The site is, therefore, to be seen as detached from the village and not a serious candidate for inclusion in its settlement boundary.

10.4.32. In its present use the site affords a recreational facility, and at my visit the site appeared to be largely occupied and in generally good cultivation. Policy 99RE5 of the Plan seeks to protect such recreational land. This, too, would be a factor to be taken into account if development were to be considered.

Objections to Paragraph 10.8.

Objectors

Objection 796
Objection C161

University of Surrey (CW)
CPRE Surrey

10.4.33. The University of Surrey asked that the Paragraph, which mentioned that the proposal to remove land at Manor Farm for the University's purposes was dealt with in Chapter 16 of the Plan, should refer to the exceptional circumstances that justified the proposals of that Chapter. The Council agreed that this should be done, putting forward PC104 for the purpose. CPRE Objected to this proposed change, in their view the exceptional circumstances not being sufficient justification for the removal of Manor Farm from the Green Belt. The Objection, with others concerning the University are considered later. My conclusion there is that the general proposals of the Plan relating to the University should be supported. I consider PC104 an appropriate change.

CHAPTER 10. RECOMMENDATION 1.

10.4.1. That PC104 be made.

POLICY 99RE2 DEVELOPMENT WITHIN THE GREEN BELT

10.4.34. The Policy draws on the guidance of PPG2 to give the general presumption against inappropriate development in the Green Belt and to list the purposes for which new building may be undertaken. In doing so, the Policy reflects Policy PE2 of the approved Structure Plan. The Policy attracted a large body of support. There were no Objections to the general thrust of the Policy, Objectors raising several diverse matters. A number of the Objections were site specific - for example, in support of the designation of individual Major Development Sites - and, although nominally to this Policy, are considered in relation to what I saw to be more relevant Policies.

(a) Objections concerned with affordable housing.

Objectors

Objection 323
Objection 390

GOSE
Mr G A Armstrong

Objection 416
Objection 1555,1557

Mr P See
St Martha Parish Council

Background, Objections and Issues

10.4.35. Criterion 5 of the Policy allows for affordable housing for local needs, referring to Policy 99H12. The Objection of GOSE was that this was contrary to the advice of PPG2 and should be deleted. Other Objectors also saw this concession as weakening Green Belt policy, or to be confined to brownfield sites. The amount of affordable housing to be sought in new developments should, instead, be increased. The main issue was whether this was appropriate development that should be listed in the Policy.

Consideration

10.4.36. This Criterion refers to what is generally referred to as the "rural exceptions policy", which is carried into the Plan primarily by Policy 99H12 in Chapter 5. The policy permits the development of greenfield land for affordable housing in closely defined circumstances. The policy is in every way one dealing with exceptions, which could be expected to be relatively few. It would be wrong to see it as significantly loosening the bounds on development in the Green Belt. The current version of PPG3 (March 1992) predates the current version of PPG2 (January 1992), but Annex E of PPG2 carries forward the essential advice of PPG3 relating to the rural exceptions policy. At its simplest, the advice allows the plan making authority to consider whether and how the rural exceptions policy should apply in their Green Belt areas. A new version of PPG3 may make that more clear, but at the end of the Inquiry the new version remained in draft and I have not drawn on its advice. In my consideration of Policy 99H12 I have concluded that the Policy should remain in the Plan. Accordingly, I do not consider that the reference in this Policy should be removed.

- (b) Limited development in residential areas outside settlement boundaries

Objector

Objection 672

Cable Country Homes

10.4.37. The Objector referred to circumstances arising from a specific case where permission had been refused for development in a low density residential area outside the settlement boundary of Godalming. Noting that there were a number of such areas in the Plan, it was suggested that the Plan should allow limited infilling in these areas. It was proposed that a further category of land should be included, land which was substantially developed, but at a low density and in which modest further development need not harm the openness or character of the area.

10.4.38. I saw the definition of the Green Belt as essentially to keep land free of new buildings, there being a general presumption against inappropriate development. This Policy lists various forms of development that are considered appropriate, including some development in settlements. Criterion 4 permits infilling within the boundaries prescribed by

the following Policy 99RE3. It appeared likely that the Objectors' difficulty lay more with the definition of the settlement boundaries than the criteria of this Policy. The low density residential areas to be found in several parts of the Green Belt pose a particular problem, although if the objective of maintaining the Green Belt essentially open, development in consequence being severely restrained, the basis on which the settlement boundaries have been drawn can be seen to be well founded. I do not consider that it is necessary to look at these low density residential areas again with a view to introducing a further level of policy or area definition.

- (c) "Essential" facilities for outdoor sport

Objector

Objection 1556

St Martha Parish Council

10.4.39. The Objector asked what were the "essential" facilities for the outdoor activities listed in Criterion 2. In answer, the phrase was drawn directly from PPG2, which in paragraph 3.5 enlarges on the intention and gives some examples. The key sentence is:-

"Essential facilities should be genuinely required for uses of land which preserve the openness of the Green Belt and do not conflict with the purposes of including land in it."

It would in the first instance be for the prospective developer to consider this advice and thereafter for the local planning authority to make its interpretation. I did not see a need to add this sentence to the Policy or its reasoned justification.

- (d) Addition of reference to re-use and adaption of rural buildings

Objector

Objection 1526

Loseley Estate (CW)

Objection C162

CPRE Surrey

10.4.40. The first Objector drew attention to the omission from the Policy of reference to the reuse and adaption of rural buildings permitted by Policies 99RE9 and 99RE10. Paragraph 3.7 refers to this form of development helping to secure the continuing stewardship of land, especially by assisting farmers in diversifying their enterprises, and may contribute to the objectives for the use of land in Green Belts. It was noted that the building being already there, the openness of the Green Belt should not be prejudiced, while permitting a use can prevent it falling into dereliction.

10.4.41. The additional criterion proposed by the Council (PC105) was:-

- "6. Re-use and adaptation of rural buildings in accordance with Policies 99RE9 and 99RE10."

PPG2 talks of there being suitable safeguards to development of these sorts. These are included in the subsequent Policies and I saw no need to refer to more than the Policies themselves here.

10.4.42. CPRE saw this addition as potentially weakening Green Belt policy, but as a form of development accepted in PPG2 it is, I consider, appropriately included.

- (e) Development should be confined to appropriate settlements

Objector

Objection 972

Mr M K Boorer

10.4.43. The Objector was concerned that the long term effect of the Policy would be to increase the size of settlements in areas already lacking appropriate local facilities and adequate roads and transport. In his view, development should be confined to reasonably served settlements and to the towns.

10.4.44. This Objection made a similar point to that raised in relation to Criterion 5 of the Policy, which was seen as a means to expand development beyond settlement boundaries. This is, however, a broader point as to the location of development, although it can be pointed out that the objectives of the Plan are to direct major development to the urban areas and in the rural areas to concentrate what new development takes place in the best served villages. Policy 99RE3 lists those villages and under that Policy settlement boundaries are drawn to confine the development permitted. The boundaries, by definition, do not take in land that is undeveloped, outside the main body of the village. It appeared to me that the Objectors point was met by the Plan.

- (f) Other Objections to the Policy

Objectors

Objection 1659

Country Landowners Association

Objection 2025

Seal and Sands Parish Council

10.4.45. The first Objector asked for the Plan to recognise that the "essential needs of agriculture and forestry" were changing as these activities themselves changed. It was argued that the definition of agriculture must be allowed to evolve to match these changes, if agriculture and forestry are to continue their role of shaping the landscape through good management practices.

10.4.46. I was uncertain just what the Objector had in mind. Agriculture is not defined in the Plan. Farm diversification is encouraged by National guidance and in the Plan by Policy 99RE8. The reuse and adaptation of farm buildings is permitted by the two following Policies. The changes in the rural economy are generally a gradual process and, no doubt, if there were other needs they would be taken into account in later advice and the relevant

policies could be adjusted. As it stood, I considered that the Plan was sufficiently flexible in this regard.

10.4.47. The Parish Council was concerned that the Plan was allowing too much in the way of rural housing, but, in my view, no more than is commensurate with the advice. They were also concerned with a particular local issue, the sandpits which present problems when being worked and further problems in their after-use.

10.4.48. The sand pits on the outcrop of the Folkestone Beds through the Parish are long established and often in close proximity to the local settlements. Some of the disused pits now have a recreational use, or have been restored to an open use. A few await restoration. While in the Green Belt, minerals are necessarily worked where they occur, and these sands have a particular value. The planning implications of mineral working are covered by the Surrey Minerals Local Plan and are not, therefore, a matter specifically for the Plan.

(g) Objections to Paragraph 10.11

Objectors

Objection 189
Objection 1482

Surrey County Council (CW)
Ms S Stephens

10.4.49. The Paragraph refers to the exception made to Green Belt policy for affordable housing by Policy 99H12. The County Council considered that exceptions to Policy should not be referred to, but for the reasons given earlier, I consider Policy 99H12 to be an appropriate one and its reference in this Policy justified. Accordingly, I see it to be necessary to refer to the Policy in the reasoned justification.

10.4.50. Ms Stephens asked for the "exception sites" to be brownfield only, with this being specified in the Paragraph. I could sympathise with this view, but the National advice does not make this stipulation. The availability of brownfield land adjoining a particular settlement would be something to take into account if a proposal for a greenfield site came forward, other advice would encourage that, but it would go against the advice to rule out greenfield sites.

CHAPTER 10. RECOMMENDATION 2.

10.4.2. That PC105 be made.

POLICY 99RE3 IDENTIFIED SETTLEMENTS IN THE GREEN BELT

Introduction

10.4.51. Apart from the urban areas of Guildford and Ash/Tongham all of the "identified rural settlements" are in the Green Belt and all are "washed over" by the Green

Belt notation. The relevant policies of the approved Structure Plan are Policy PE2, Development within the Green Belt, and Policy RU1, Rural Settlements. Policy PE2 conveys the normal presumption against inappropriate development in the Green Belt, outside the rural settlements. Policy RU1 indicates that local plans will identify rural settlements, indicates the general way in which their bounds should be defined and the development that would be permitted.

10.4.52. The Structure Plan was adopted in February 1995. The revised version of PPG2, Green Belts, was published in January 1995 and it cannot be expected that the Structure Plan was able to take account of all of the changes of policy and advice introduced at that time. The earlier version of PPG2 published in 1988 did not give guidance on the treatment of Green Belt settlements, whereas the revised version went into the topic in some detail. The Plan relies heavily on the Structure Plan for its approach to this aspect of Green Belt policy and a recurring theme in the Objections was that the Plan was not on all fours with the current advice. Rather than identifying villages on the basis of their size or service base directly, PPG2 looked to the level of development that might be accommodated. It was suggested that villages might be treated in one of three ways, dependent on the extent of new development considered appropriate:-

1. Washed over with the Green Belt notation and new building permitted only for the purposes of agriculture and forestry, essential facilities for outdoor sport and outdoor recreation, etc., and limited extension, alteration or replacement of existing dwellings.
2. Inset (excluded from the Green Belt) or washed over (when a boundary may still need to be defined), infilling only being permitted.
3. Inset and limited development (more than infilling) or limited expansion permitted.

10.4.53. The adopted local plan identified 25 rural settlements, all washed over by the Green Belt, and defined boundaries for each (Policy 2RE). The development to be permitted in those settlements was the same as that proposed by the Plan. It was noted in the Topic Paper, Identified Settlements in the Green Belt (CD16), that this approach had been successful in maintaining the openness of the Green Belt, whilst allowing small scale development appropriate to the village. The same settlements were again identified and relatively few changes made to the settlement boundaries.

10.4.54. The Topic Paper was augmented during the course of the Inquiry with a Supplementary Note (CD16a), in recognition of the Objections that the Plan was not following the advice of PPG2 in its treatment of the Green Belt villages. None of the villages had been inset, but, in the Objectors' view, more than infilling was permitted. The Council's view was that the approach of the Plan was justified by past experience, and that there was no meaningful differences between what was proposed in the Plan and the advice of PPG2. It was pointed out that PPG2 does not define "infilling". Examples of the policies contained in the local plans of some other Surrey authorities showed a broadly similar approach.

10.4.55. The Policy attracted a very considerable body of support. It attracted, also, a large number of Objections. Many of the Objections were site specific, relating to the

drawing of the settlement boundaries. These Objections almost invariably also raised the matters mentioned above, together with the identification of settlements and the way the boundaries were defined. I have divided my consideration into topics, mentioning the Objections concerned with that topic, but where more than one matter was raised I have not necessarily repeated the Objection reference under all relevant topics.

(a) The relationship of the Policy to PPG2 advice

Objectors

<i>Objections 435/6</i>	<i>Bewley Homes Plc</i>
<i>Objection 710</i>	<i>Mr Dobbie</i>
<i>Objection 711</i>	<i>Mr C Allen</i>
<i>Objection 761</i>	<i>Gleeson Homes</i>
<i>Objection 1115</i>	<i>Mr S Brooks</i>
<i>Objection 1802</i>	<i>Ashdale Land and Property Co Ltd</i>
<i>Objection C27</i>	<i>Horsley Countryside Preservation Society</i>
<i>Objection C163</i>	<i>CPRE Surrey</i>

Background, Objections and Issues

10.4.56. The background to the Objections was given above. Essentially, the complaint was that the proposals of the Plan were contrary to the advice of the current version of PPG2. The main issue in this respect was whether the Policy was required to be changed to conform to the advice.

Consideration

10.4.57. The Structure Plan looked to a base of services and accessibility in identifying settlements where further development could be contemplated. The advice of PPG2 suggests that it is the intentions of the local planning authority in terms of the development that is to be permitted rather than size or other characteristic that is the determining factor in the identification and classification of villages, but the distinction between the advice of PPG2 and what was required by the Structure Plan appeared to be largely superficial. In seeking sustainability the service base should now be fundamental to the development that it is reasonable to permit and it is this that guides the Plan's identification of villages.

10.4.58. Of the three categories set out in PPG2 Category 3 is the only Category in which development on any scale is anticipated and then "limited". Many Objectors saw what the Plan was proposing as more than the infilling of Category 2 and properly falling into Category 3. The Category 3 villages would be "inset" as far as the Green Belt notation was concerned. Several Objectors suggested that the villages should be divided between the PPG2 categories on the basis of a consideration of the different levels of new development appropriate in each, having regard to the opportunities, the size of the settlements and levels of services, etc. The Policy should then be revised, or two or three relevant Policies substituted.

10.4.59. The Council was firmly of the view that, whatever might have been said in the Topic Paper, the intention was that only development in the nature of infilling was intended and that Category 2 was the appropriate category, in so far as the advice was concerned.

10.4.60. I could appreciate that the identified villages varied considerably in size and character. I did not, however, see that this argued strongly for different treatment. The Policy listed three classes of development, the first infilling in a built frontage and the second and third housing and community or employment development respectively on land substantially surrounded by existing development. As to the Council's intention, a part of the problem arose from the form of the Policy as deposited. Describing the first class of development as "infilling" and as development of up to two dwellings in a continuous built up frontage, there was the implication that the two further classes of development were not necessarily seen to be infilling, even if the link was kept by talking of land substantially surrounded by existing development.

10.4.61. The Council argued at the Inquiry that these other forms of development were also reasonably seen to be infilling in the terms of the intention of PPG2, an intensification of development within the main built envelope of the village, if going beyond the narrower meaning often given to the term. It was stressed that GOSE had not Objected to this Policy, while criticising others for their relationship to the advice.

10.4.62. That the PPG did not define infilling may mean that the traditional meaning was intended, but it may also be significant, as is often the case, of the general advice setting the principle and leaving the detail to be tailored to the local situation. I agreed that what the Plan was proposing was something less than Category 3 would appear to envisage, development that could involve a limited expansion of the village and that it would be contrary to the objectives of the Plan to widen the Policy for such development to be permitted. This appeared to be borne out by the development that had taken place in the villages under the current policy.

10.4.63. I accepted that a wider interpretation should be placed on the PPG2 use of "infilling" than simply filling a small gap in an established frontage and that it could reasonably extend to modest redevelopments in depth and developments of backland within the built up area of the village. These would need to be judged on the circumstances. I did not see it as appropriate to narrow the Policy to allow only infilling of the "traditional" kind, simple small scale frontage development. What is perhaps of importance is that the Plan should make clear what is meant. I suggest in the recommendation a way in which the development to be permitted could be described to better maintain the necessary link with the advice.

(b) The definition of settlements

Objectors

Objections 460,465

Objection 504

Objection 1891

CPRE Waverley

Peak Quality Homes Ltd

CPRE Surrey (CW)

Consideration

10.4.64. The Plan carries forward the settlements identified in the adopted plan. As mentioned earlier, in that plan they had been identified on the basis of the shops and other services they could provide for the local community and this approach was continued into the Plan (Time to Decide, CD4). The Policy insists that development will only be permitted where the necessary services are adequate and it would be without detriment to the character of the countryside or the settlement. The approach is outlined in Paragraph 10.14 and is consistent with Policy RU1 of the Structure Plan.

10.4.65. Objectors considered that three further villages should be added the list, Peasmarsh, West Clandon and Chilworth St Martha. Chilworth St Martha, in which Peak Quality Homes Ltd also suggested a site with potential for development is considered later. Neither of the first two of these settlements, however, is of any great size, although Peasmarsh could also take in a substantial employment area, nor has very much in the way of services or facilities. The implication of inclusion would be that modest development in the nature of infilling as described above would be permitted. It appeared to me that the opportunities for this were limited, while the lack of facilities within or very close would make these locations difficult to see as "sustainable". They were not, to my mind, appropriately included among the identified villages.

(c) The definition of settlement boundaries

Objectors

Objection 3
Objection 1450

Mr N Picken
West Horsley Parish Council

Consideration

10.4.66. The settlement boundaries defined by the Plan are the same as those of the adopted plan, apart from minor changes to the boundaries of five villages. The criteria used to define the settlement boundaries were given in the Topic Paper (CD16). A source of some misunderstanding lay in the boundaries being a tool of an intention to restrict the opportunities for further development to the modest intentions of the Policy, rather than seeking to define the local community. For that reason the boundary was drawn to exclude low density areas, even where they might otherwise be seen to be a major part of a settlement, sites in non-residential use on the edges of settlements and separated and loose knit groups of houses. I could accept, as the Parish Council suggested, that the boundaries should have an entity in relation to particular villages, but, as in the case of East and West Horsley, in which the built up areas merge together, I did not see this as essential.

10.4.67. Also omitted by the definition of the Topic Paper were sites "where past planning histories indicate the site should be excluded". This was questioned by some Objectors and its precise meaning may be difficult to define. It is possible, nevertheless, to identify sites which have been through the processes of planning applications and often

appeals and been considered unsuited for development. This was not included in the resume of the criteria in Paragraph 10.14 and this should be seen as the definitive basis for definition, I would have thought that most of these sites would in any case have been excluded by one or another of the more general considerations. Others may have been excluded on grounds of the qualities of a particular proposed development which could conceivably be overcome and provide a development that would be satisfactory.

10.4.68. The criterion that the boundary should be identifiable on a 1:10,000 scale map is a sensible one, although it gave rise to some difficulties in practice where boundaries did not follow property boundaries but sought other features. If other features were clear on the map and on the ground I saw no objection in principle to their use as boundaries.

10.4.69. It would I consider be of assistance to using the Plan, noting the difficulties to which this aspect has given rise, to add that in identifying settlements, the boundaries are drawn to limit the areas in which development may take place to those parts of the settlement where it will conform to the purposes of the Policy, that is to say, it will not affect the scale or appearance of the village or impinge on the openness of the Green Belt. This does not envisage extension of the built up area of the settlement or other than very limited development taking place. The summary of the criteria used in drawing the boundaries given in Paragraph 10.14 is I consider sufficient for the Plan itself.

(d) Wording of the Policy and reasoned justification

10.4.70. I have suggested some changes to the wording of the Policy to make the intention more clear, but there were several further suggestions from Objectors.

Objection 1208

HBF (CW)

10.4.71. The Objection considered that the limitation of development in class 1 to "by up to 2 dwellings" was arbitrary and too limiting. The Council agreed that the phrase should be removed (PC106) and, in view of the interpretation of infilling being used by the Council, I agree.

Objection 44

Glen House Estates Ltd

Objection 1115

Mr S Brooks

10.4.72. Class 2 refers to "small scale" housing developments appropriate to the scale of the settlement and locality. The Objector was of the view that the larger settlements should be removed from the Green Belt, when the limitation would not be required. However, I consider that the "washed over" status of the Green Belt villages should be maintained and that "small scale" as an indication of the volume of development is appropriate. That "scale" is used in another sense later in the same sentence could be seen to make the first use superfluous, but I do not recommend the removal of either.

<i>Objection 293</i>	<i>Horsley Countryside Preservation Society (CW)</i>
<i>Objection 435</i>	<i>Bewley Homes Plc</i>
<i>Objection 718</i>	<i>Mr Dobbie</i>
<i>Objection 759</i>	<i>Gleeson Homes</i>
<i>Objection 1070</i>	<i>Mr P Witting</i>
<i>Objection 1080</i>	<i>CASA Developments Ltd (CW)</i>
<i>Objection 1110</i>	<i>Mr S Brooks</i>
<i>Objection 1203</i>	<i>National Trust</i>
<i>Objection 1465</i>	<i>Shere Manor Estate</i>
<i>Objection 1469</i>	<i>Mr and Mrs J V Hawkins</i>
<i>Objection 1476</i>	<i>Estate of J E Alcard deceased</i>
<i>Objection 1802</i>	<i>Ashdale Land and Property Co Ltd</i>
<i>Objection C164</i>	<i>CPRE Surrey</i>

10.4.73. The Objections related principally to both the Policy and Paragraph 10.17, which gave a description of the development the Policy would permit, enlarging on some of its phrases. Classes 2 and 3 of the Policy include "substantially surrounded by existing development". Paragraph 10.17 described substantially surrounded by existing development as referring to sites with development on a minimum of three sides. Objectors took two views. The National Trust was concerned at the implication that if a site need not be completely surrounded by building, the Policy could permit inappropriate infilling along the boundaries of the Navigations. The majority of Objectors considered the requirement too strict in the limitations it would impose on otherwise acceptable development in villages. Some asked for clarification as to what "development" meant, asking if a road or railway on one side could be seen as development.

10.4.74. I could see the danger foreseen by the National Trust, but felt that it was one that was better met by those aspects of the Policy protecting the character of villages and other Policies of conservation, amenity and the environment. I could accept that there may be instances where a site will clearly be in the built up part of the village but not necessarily with built up land on all its boundaries, or even on three out of four, and that where such sites were appropriate for development it should not be obstructed by the Policy. I took no view as to what might constitute adjoining development, seeing the interpretation of when a site was "in" the village for the purposes of this Policy as likely to be a matter to be determined on the individual circumstances.

10.4.75. I was less sympathetic to those Objectors who asked for the removal of the phrase as a whole, or its amendment, to permit the development of land that might go beyond the settlement boundary. The Policy is directed to permitting development only within the settlement boundaries, these having been defined to exclude the more open land on the periphery of villages, and I could see no reason to adjust the Policy so that development which might extend the core development of the village and possibly affect the openness of the Green Belt might take place. The Council was, however, prepared to remove "these are sites with development on a minimum of three sides" (PC107) which would add a measure of flexibility, while not opening the doors to village development damagingly wide.

10.4.76. The County Council pointed to the word "exceptions" in the final paragraph of the Policy, suggesting that it was unnecessary. Having set out classes of development which may be permitted in the listed villages, the development described is not an exception to this or any other Policy of the Plan, nor to general Green Belt policy. The Council agreed that it should be removed (PC106).

Objection 1377

Effingham Residents and Ratepayers Association (CW)

10.4.77. The Objectors were supporters of the Policy, their concern being to seek more stringent criteria in Conservation Areas. Many of the villages have designated Conservation Areas. The Council pointed out that the Policy was protective of the character and appearance of villages, but that there were specific Policies in the Plan which would apply in Conservation Areas. The Objector, and I, agreed that there was no need to duplicate the Policies of Chapter 11 in this Chapter.

10.4.78. Paragraph 10.14 refers to Structure Plan Policy RU2 as the Policy underpinning the definition of villages. The correct Policy appears to be Policy RU1 and I suggest this correction is made.

CHAPTER 10. RECOMMENDATION 3.

10.4.3. That the second paragraph of Policy 99RE3 be worded as follows:-

WITHIN THESE SETTLEMENT BOUNDARIES NEW BUILDING WILL BE PERMITTED IN THE NATURE OF INFILLING ON LAND SUBSTANTIALLY SURROUNDED BY EXISTING DEVELOPMENT FOR THE DEVELOPMENTS REFERRED TO IN POLICY 99RE2 AND THE FOLLOWING PURPOSES:-

1. DEVELOPMENT OF A SMALL GAP IN AN OTHERWISE CONTINUOUS BUILT UP FRONTAGE OF APPROPRIATE SCALE AND DESIGN;
2. SMALL SCALE HOUSING DEVELOPMENTS APPROPRIATE TO THE SCALE OF THE LOCALITY, ESPECIALLY THOSE DESIGNED FOR DWELLINGS SPECIFICALLY IN POLICY 99H10;
3. COMMUNITY OR EMPLOYMENT FACILITIES APPROPRIATE TO THE SCALE OF THE SETTLEMENT.

10.4.4. That PC106 be made.

10.4.5. That the following be added to Paragraph 10.14, as the fifth sentence:-

IN DEFINING SETTLEMENTS, THE BOUNDARIES HAVE BEEN DRAWN TO LIMIT THE AREAS IN WHICH DEVELOPMENT

MAY TAKE PLACE TO THOSE PARTS OF THE SETTLEMENT WHERE IT WILL CONFORM TO THE PURPOSES OF THE POLICY, THAT IS TO SAY IT WILL NOT AFFECT THE SCALE OR APPEARANCE OF THE VILLAGE OR IMPINGE ON THE OPENNESS OF THE GREEN BELT. THE POLICY DOES NOT ENVISAGE EXTENSION OF THE BUILT UP AREA OF THE SETTLEMENT BEYOND THE DEFINED BOUNDARIES OR OTHER THAN VERY LIMITED DEVELOPMENT TAKING PLACE.

- 10.4.6. That PC107 be made.
- 10.4.7. That PC185 be made (Correction of spelling of Norrels Drive).
- 10.4.8. That in Paragraph 10.14 "POLICY RU1" be substituted for "POLICY RU2".

(e) Village and site specific Objections

Background and Common Issues

10.4.79. The precise definition of settlement boundaries gave rise to a number of Objections that were essentially site specific. Many were seeking changes in anticipation that if land were included in the settlement boundaries it could be developed. In this connection some general matters arose. Firstly, the Plan has determined that, in the interests of moving towards greater sustainability, major new development should be confined to the identified urban areas. The rural settlements are not looked to to provide a significant part of the new housing or other development proposed, only development of small scale primarily to meet local needs and, as far as housing is concerned, only an adventitious contribution in the windfalls category. Secondly, in my consideration of the Housing Chapter I did not see a need to recommend the allocation of more housing land for the Plan period. As a third point, I supported the purpose of the Plan in defining settlement boundaries and the general criteria by which they were drawn. The Plan leaves all of the villages "washed over" by the Green Belt, the Policy allowing the modest development described in the defined areas of the villages, development which Green Belt policy deems "appropriate". The general presumption against "inappropriate" development applies both within and outside the settlement boundaries.

10.4.80. The Objections are considered individually, grouped by the villages to which they relate. I have not seen a need to repeat the consideration of the three matters mentioned above and in most instances the principal issues were whether the boundary was correctly drawn in the light of the criteria and whether the development that could be permitted would fit the Plan's definition of appropriate development. In this last respect, I considered that it would not be unreasonable to assume that if land were included in a settlement boundary, normally, the whole of it would be given a potential for development and the minimum densities now given by National advice would apply.

ALBURY

10.4.81. Albury was one of the villages in which a change was made from the settlement boundary of the adopted plan. The settlement boundary was drawn to include the new housing adjacent to the village hall. This recognised a change in the structure of the village and gave rise to no Objections.

CHILWORTH and CHILWORTH ST MARTHA

10.4.82. Chilworth is a substantial, elongated village in the valley of the Tillingbourne. The village is principally served by New Road and cut into two parts, east and west, by a railway. The station is at the extreme eastern end of the settlement. The village has a relatively compact form, the Objections relating to the few small areas of lower density development on its periphery.

(a) Chilworth St Martha - settlement boundary

Objections 504/5

Peak Quality Homes Ltd

10.4.83. Chilworth St Martha is essentially a compact group of houses situated between the southern side of the A248 and the railway some half a mile to the east of Chilworth railway station, itself the eastern extremity of Chilworth.

10.4.84. The Objectors considered that Chilworth St Martha should be accorded a settlement boundary, permitting the development of land in the defined area in accordance with the Policy. The boundary suggested would take in the greater part of the generally built up area, those parts concentrated in and around Roseacre Gardens and Pine View Close, land forming parts of the gardens of Pelhams and Jordans fronting onto Pine View Close being identified as having the possibility of infilling.

10.4.85. If the settlement were accorded a settlement boundary development of the sort envisaged could be acceptable, but the main issue was whether, having regard to the objectives of the Plan in the pursuit of sustainable development and of protecting the Green Belt from inappropriate development, the settlement was properly identified under this Policy. The settlement consists of some 40-50 houses, mostly built before the second World War. In terms of its services and facilities the settlement appeared to be wholly reliant on its neighbours. While the station at Chilworth and the other facilities of that village were close by, a number were towards the western end of that village and like those of the other nearby villages of Albury, Shere or Shalford they were at a distance which would be a temptation to use the car. Having regard to the criteria of CD16, the settlement falls within the definition of a low density isolated area, in contrast with the defined settlements in its vicinity, in which an intensification of development by infilling could be damaging to the openness of the Green Belt. To my mind, it was not unreasonably left without a settlement boundary.

(b) Chilworth - site specific Objections

(i) Tangley Mere

Objection 117

Mr R J Jones

10.4.86. Tangley Mere is a large detached house standing in extensive grounds on the south side of New Road immediately to the south of the railway crossing. The southern side of New Road is closely developed up to this point and again beyond the railway, but the site forms a window to the open land to the south of the village, further east the railway forming the southern boundary of development.

10.4.87. The Objection related only to the part of the land which formed the open frontage to New Road and contained the house. However, the Policy was seeking to define settlements with an eye to the potential for development that might be the result, permitting only infilling. In drawing boundaries the more loose-knit areas of development otherwise to be seen as within the village have been excluded, particularly where they would offer the potential for development not easily definable as infilling, or would extend the more densely developed parts of the village, to the detriment of the openness of the Green Belt.

10.4.88. I could accept that the site was central to the geographical spread and within the community of the village, but for the purposes of the Policy, it was reasonably seen as land more sparsely developed than the village in general and from its size and position offering opportunities for more than infilling if it were to be included. Development would at this point have the effect of extending the village into the open land of its surroundings, to the detriment of the Green Belt.

10.4.89. I noted the two appeal decisions that related to the site, a part of which extends beyond the Plan boundary. These came to similar conclusions in relation to the effects on the Green Belt. My primary concern was, however, the application of the Policy to this site and to my mind the settlement boundary has been correctly drawn at this point.

(ii) Land at Hornhatch Farm

Objection 769

Gleeson Homes

10.4.90. Hornhatch Farm is at the western end of Chilworth, the land concerned in the Objection being two fields forming an L-shaped site of about 4ha enclosed within a southward bend of New Road to the north of the farm buildings and lapping round the playing fields of Tillingbourne Junior School. The development of the village extends to the northern side of New Road opposite the site, but not beyond East Shalford Lane and the southward bend of New Road.

10.4.91. The site is farmland clearly outside the village - Hornhatch Farm is well separated from the village - and the settlement boundary could only reasonably be extended to it if the site were to be allocated for housing under Policy H2. It was argued that this should be done, and I noted that the site could provide more than 120 dwellings, but in

connection with the Housing Chapter of the Plan I have concluded that there is no need to allocate further land for housing in the Plan period. That being so, there is no reason to recommend that the settlement boundary be extended to this land, to do so being contrary to the criteria by which settlement boundaries have been defined and likely to result in a substantial extension of the village, to the serious detriment of the Green Belt.

(iii) Land and buildings at the eastern end of Chilworth

Objections 1271/2 Messrs C and G Hayward

10.4.92. The Objections related to land at the extreme eastern end of the village. In total, it included Chilworth Church of England First School, the Percy Arms public house and Aston Villa to the north of New Road and to the south the railway station and, separated from the station by a lane, a part of the premises of Haywards Garage, the western part of the premises being within the settlement boundary as defined. The Objectors considered that all of the land should be included in the settlement boundary, or, failing that, the remainder of Messrs Haywards premises.

10.4.93. The closely developed frontages of the village extend eastward along the northern side of New Road to the school. Beyond that the development is of more open form, the car park of the public house connecting through the school grounds to the open land to the north of the village. With the railway station and the sparse development to the south of the railway it appeared to me that applying the criteria for drawing the settlement boundaries this area of relatively scattered development was reasonably excluded.

10.4.94. As to the premises of Messrs Haywards, the principal building is on the western part of the site, which, although the site is occupied as a whole, could be differentiated from the eastern part by the hedge which went part way across the land. The eastern part, which was once a petrol filling station, contained only one small building, but like its neighbour was paved and used for parking commercial vehicles and the storage of materials, although the hedge on the road frontages greatly reduced their prominence.

10.4.95. On visiting the site I could appreciate the basis for the Council's view that the eastern part of the site was more of the open, scattered development at the eastern end of the village than of its more closely developed frontages. The railway is at ground level and the site merges with the well treed gardens of Sample Oak Cottages beyond. Seen from the east, the hedge masks the site and the impression is that the development of the denser part of the village does not start until the workshop on the western part of the site is reached.

10.4.96. There was an impression created by the development surrounding the triangular green in front of the station that this was in reality the eastern end of the village, but the settlement boundary is not seeking to define either the extent of the physical village or its community. The more sparse development of the eastern end of the village is reasonably excluded from the settlement boundary. Visually and structurally forming apart of this area, I consider that the Council was correct to draw the boundary to exclude the eastern part of Messrs Hayward's premises.

EAST HORSLEY

10.4.97. East Horsley is a very large, amorphous settlement having its principal focus in its original centre towards the southern end of the settlement and a secondary centre in the vicinity of the railway station. Much of the settlement is of relatively low density residential development more suburban than village-like in character.

10.4.98. The settlement boundary has been drawn to take in almost the whole of the settlement to the north of the Epsom Road, including the development around Effingham Junction station to the north east. A sizeable residential area to the south of the Epsom Road is excluded, as are a ribbon of development in Ockham Road North and an almost detached area of housing around Manor Farm between East Horsley and its neighbour West Horsley. The Plan proposed a small change to the settlement boundary of the adopted local plan at Norrels Drive.

(a) Fangate Manor Farm

Objection 17

Mr R Gill

Objection 18

Harmony Holdings

10.4.99. The Objection site was two adjoining parcels of land of roughly equal size owned by the Objectors. Together they had an area of about 2.5ha and were situated on the western side of the village, the southern parcel containing Fangate Manor Farm house and outbuildings and the gardens and orchard of the house. This site was approached through St Martins Close, a recently refurbished development of flats and houses, the road also serving houses in Holmwood Close immediately to the east of the land. The northern parcel was a field with an entrance from Manor Close to the north.

10.4.100. The site was close to the main core of the settlement and had development on three sides with farmland on the fourth. The settlement boundary was drawn around these developed boundaries. The site was described by the Objectors as unique, and while this may be an overstatement, the convenience of the site, should further development be required in the settlement, could be recognised. However, the nature of the site - a house in large grounds and an open field - would not qualify the site for inclusion in the settlement boundary by the criteria of the Plan. There were arguments that there was a local need for further housing, but the site was a sizeable one, larger than would be likely to be required for the purposes of Policy 99H12, for example, and I have identified no need to allocate more land than is proposed by the Plan for general housing in the Plan period.

10.4.101. In my view, therefore, the settlement boundary is correctly drawn. With no proven need to allocate the site for housing there is no justification on this ground to extend the settlement boundary to the site.

(b) Norrels Drive

Objections 112, 1472, 1506 Mr P Reilly

10.4.102. The site was land on the north eastern side of Norrels Drive, a narrow road lined with detached houses with the exception of land between Stone Lodge and Thors. The settlement boundary was drawn in the adopted local plan to follow the edge of a wood to the east of the road, leaving a strip of land of varying depth between the wood and the road within the settlement boundary. In the Plan the boundary was revised to follow the boundaries of the adjoining houses and then the boundary of the road.

10.4.103. The Objection was concerned to retain the frontage strip within the settlement boundary and to add to it land from the wood to create a site on which it was said a single dwelling would be erected. The site is a sizeable one. Much of it is part of a wood that forms a salient of open land into the development on the eastern side of East Horsley. To my mind, applying the Plan's objectives in relation to the protection of the openness of the Green Belt and the criteria for defining the settlement boundaries, the land is correctly excluded and I accept that the correction to the boundary better reflects the true situation on the ground.

(c) Norrels Ride

Objection 1473

Mr P Reilly

10.4.104. This site is part of the same wood mentioned in relation to the previous site, this site having a frontage to Norrel's Ride a short distance to the north. Development of this land could not be seen to be infilling, having development only on the opposite side of the road, and applying the criteria for drawing the settlement boundaries this land is reasonably excluded.

10.4.105. It was suggested that this land could be appropriate to provide housing for local needs. I have seen no need to suggest that more land be allocated for housing in the Plan period, but the Plan recognises that there may be a need for affordable housing for the rural settlements. In part this may be achieved through small developments by housing associations or others of land within the settlement boundaries, possibly under Policy 99H11, or by application of the rural exceptions policy, Policy 99H12. The site might be considered under the latter Policy, but would not need to be included in the settlement boundary for that to take place.

(d) Horsley Towers

Objection 421

Initial Style Conferences

10.4.106. Horsley Towers is a large country house with ancillary outbuildings and gardens located on the eastern side of the settlement close to its main core. The house and its immediate surroundings are in the village Conservation Area. It appears now to be mainly used as a conference centre.

10.4.107. I have no doubt that the house has always been of importance to East Horsley, or that it remains so today, but the house and its grounds typify the low density development on the edge of villages normally to be excluded from settlement boundaries. Exclusion is a

reflection of the purposes of the Policy to protect the Green Belt and not on the status of the house as an integral part of the village. In this instance the house itself is a little removed from the edge of the settlement with parcels of open land intervening. To include this with the house in the settlement boundary as suggested would be to open substantial sites for development, not required for the purposes of the Plan, that could extend building up to the house, to the detriment of the Green Belt in this area.

(e) Manor Farm, Long Reach and East Lane

Objection 438
Objection 1515

Bewley Homes Plc
Mr J R Isaac

10.4.108. As noted earlier, the settlement boundary excludes an area of housing on the western side of the village around Manor Farm. This consists of a ribbon of development along the northern side of East Lane which expands into three residential culs de sac, extending as a compact residential area along Long Reach. The open land of Manor Farm is between the development off Long Reach and the current edge of the defined settlement in Northcote Road.

10.4.109. The Objections variously sought inclusion of the whole block including the residential area, the Farm and a depot in Long Reach, in the settlement boundary, but this was refined to apply only to the residential area. The Farm and the depot would not meet the criteria for definition of the boundary and there would be no reason to consider allocating so substantial an area of open land for housing to meet the needs of the Plan period.

10.4.110. The housing area, some of it originally public housing, is at a relatively high density compared with the settlement in general. In applying the criteria for defining the settlement boundary, the Council considered it disqualified because the extension of development along East Lane from Northcote Road was only on the northern side of the Lane, the more substantial residential area being separated from the main settlement by the open land of Manor Farm. It was also pointed out that the junction of this ribbon with the development at the corner of Northcote Road was weak, there being an open area which provided a visual and functional separation. There was discussion as to the distance of this area from the main facilities of the village, and if development were to take place this could be a consideration, but it was not among the factors set out for defining the settlement boundary.

10.4.111. I noted that the Council had reconsidered this area in the preparation of the Plan and concluded that even if there were factors in favour of inclusion in the settlement boundary, on balance the separation of the most compact area of housing concerned from the main core of the settlement still argued against a change. Having listened to the arguments and having had an opportunity to visit the area, I recognised the dilemma, but my conclusion was that the separation, emphasised by the weak point where the area in question joins the defined settlement boundary and the development in East Lane being confined to the north of the Lane reinforced the view that the ribbon along East Lane was not appropriately included, while the denser development of Greta Bank and off Long Reach was detached

from the settlement proper. I did not feel that the boundary defined in the Plan misapplied the considerations set out for defining the boundary, or that it was wrong.

(f) Chalk Lane, The Warren, Rowbarns Way and Green Dene

Objection 711

Mr C Allen

10.4.112. The Objection related to the part of East Horsley to the south of Epsom Road/Guildford Road, including some development to the north of Guildford Road to the east of the village. This relatively extensive area took in Longhurst Road, Chalk Lane, Green Dene, Rowbarns Lane and The Warren, as well as some lesser areas of development. Over much of the area development mirrored the generally low density of other parts of East Horsley, at least as far as the frontage development in the main roads was concerned, but towards the south of the area and between Chalk Lane and Green Dene there was development of lower density and sizeable undeveloped areas. The Objector's property fell in this area.

10.4.113. The paddocks within the double bends of Epsom Road/Guildford Road at the southern entrance to the core of the village separate the area to the south from the northern part of the village in visual terms and, while it is not denied that this southern area is an intrinsic part of the village, there is an impression that these roads form the southern boundary. I accept that Longhurst Road provides a bridge between the two, but its significance is diminished by its somewhat peripheral position. Relying on the impressions of my visit, the closer spaced development of the southern part of Chalk Lane and Green Dene is separated from the denser development of the northern parts of these roads by the more spacious development and open land that intervenes.

10.4.114. This pattern of development to my mind gives a different impression to this area as a whole from the more uniform pattern to be seen over much of the northern parts of the settlement. While I accept that the area is distinguishable from the woods and fields of the countryside surrounding it, there is an impression that the countryside penetrates this area that is not found to the same degree in the residential areas of the northern part of the settlement.

10.4.115. This I considered justified seeing much of the development of this area as loose knit, or in the case of the development at the extreme south of the area as both low density and detached from the main settlement. This suggested to me that it would not be appropriate to include the area proposed in the settlement boundary. I considered if some smaller area should be included, having in mind Longhurst Road and the northern part of Chalk Lane, which I commend to the Council, but I did not see that Guildford Road, other than at the junction with Chalk Lane, or Rowbarns Way and The Warren should be included, nor the ribbon of development along the western side of Green Dene.

CHAPTER 10. RECOMMENDATION 4.

10.4.9. That the settlement boundary for East Horsley be changed to include Longhurst Road and the northern part of Chalk Lane and properties in

between (excluding the open land at the corner of Epsom Road/Guildford Road).

EFFINGHAM

10.4.116. The developed area of Effingham falls into two parts, the older village, with later additions, centred on the junction of The Street/Effingham Common Road with Oreston Lane/Lower Road and, linked by The Street, an extensive area of more modern housing to the south of Guildford Road, only the western part of which falls in the Plan area. The settlement boundary is drawn tightly around the older village and takes in the relatively close development of the modern housing area to the south. The Effingham Parish Council and Effingham Residents and Ratepayers Association opposed the proposals to change the settlement boundary.

(a) Effingham Lodge Farm

Objections 1187/8

Effingham Horticultural Produce Ltd

10.4.117. The Objectors occupy Effingham Lodge Farm, a horticultural holding occupying the quadrant between Lower Road and Effingham Common Road, behind some of the frontage properties in both roads. The settlement boundary excluded this quadrant and to the south of Lower Road the school and houses to the east of Church Street. The Objection proposed the inclusion of part of the farm, including its main buildings, and the school and other properties to the south of Lower Road. In support, a need for housing for local people was pointed to, with the suggestion that the change could allow up to 25 dwellings to be built.

10.4.118. In so far as the farm was concerned, the criteria for defining settlement boundaries would not include so large an area of open land and agricultural buildings. The considerations would also exclude the schools, while the six houses in Effingham Common Road are a short length of ribbon development detached from the main part of the village. This would leave the possibility of including The Lodge, apparently a nursing home, with more modern houses in Effingham Place, but this area is of lower density and presents a looser pattern of development to that generally included in the settlement boundary. With the neighbouring development it is not unreasonably excluded.

10.4.119. The Plan makes provision for the general housing requirements for the Plan period and I have not seen a need to add to the allocations. The Plan, nevertheless, recognises that there may be a requirement to provide housing for identified local needs and Policy 99H12 takes this into account, as far as the villages are concerned. The implementation of this Policy would not require a prior adjustment to the settlement boundary.

(b) Extension of village boundaries

Objection 1350

Mrs S K Lejour

10.4.120. The Objector proposed extension of the settlement boundary along the southern side of Orestan Lane as far west as Calvert Road. The boundary would then abut that of Home Farm, Effingham, the subject of Policy 99H16. The proposed addition was a row of detached houses, separated from the main part of the village by a small paddock and for a part of its length matched by a similar row of houses on the northern side.

10.4.121. In the Council's eyes the detachment and the ribbon nature of much of the housing concerned did not put it within the criteria for the definition of settlement boundaries. On visiting the area I did not disagree with this. I gave consideration as to whether it might be appropriate to include that part where there was development on both sides of Orestan Lane, but the link on the southern side to the present western extent of the settlement boundary would include open land where development, if it were to take place, would be likely to be too great to be seen as infilling in the local context and, by filling this open land, contrary to the objective of protecting the openness of the Green Belt. While not doubting that these houses are part of the village in functional and community terms, I agreed that it was not appropriate within the terms of the Policy to extend the settlement boundary to include them.

(c) St Lawrence School playing field, Church Street

Objection 2034

Mr A Bedford

10.4.122. The playing field, apparently once part of the grounds of The Lodge, is situated on the eastern side of Church Street between a house, Ambleside, at the corner with Lower Road and the graveyard of the Church. The Objector saw the land as having a potential, if it were no longer required for the School, for residential development to improve the aspect of Church Street.

10.4.123. Church Street is given considerable charm by the buildings on its western side and by the Church. The site is above the level of the road and affords no particular views, although the tall belt of shrubs on its boundary with the road adds much to its character. Church Street is a part of the Conservation Area and no doubt if development were contemplated every effort would be made to ensure that it was in character and enhanced rather than detracted from the area. However, I was not aware that the situation the Objector feared was likely to come about in the Plan period. The site, being wholly open and part of a larger open area in the grounds of The Lodge, would not meet the criteria for inclusion in the settlement boundary. If it were included, it would be too large to take the sorts of modest development the Policy envisages and I do not consider that it is necessary for the Plan to allocate more land than is already proposed for housing in the Plan period. I do not, therefore, consider that it would be appropriate to recommend a change to the settlement boundary.

GOMSHALL

10.4.124. The village is situated in the Tillingbourne Valley, the lower part along the river having been occupied in the past by a mill and a tannery, the residential development spreading mainly up the gently rising land to the south. On the eastern side of the village a

substantial area of open land which including a sports ground and woodland, part of it the former tannery's tip, which links with the countryside to the east of the village. The open land extends southwards to High View, where there was formerly the garden of Gomshall Lodge adjoining Gomshall Cottage. The settlement boundary excludes this large open area.

Land north of High View

Objection 1081

Casa Developments Ltd

10.4.125. The Objection proposed inclusion in the settlement boundary of the former garden of Gomshall Lodge and Gomshall Cottage. Gomshall Lodge itself (now subdivided) is to the west of the land and included in the settlement boundary. The former grounds extend along the northern side of High View for two thirds of its length, Gomshall Cottage taking up the remainder and itself excluded, although the settlement boundary takes in houses in Goose Green further east. The houses on the southern side of High View are also included. The former grounds had been cleared at the time of my visit, when it was apparent that the land rose quite sharply from the woodland to the north, the trees limiting what might otherwise have been a good view across the valley.

10.4.126. An appeal decision in 1988 relating to the former grounds of Gomshall Lodge rejected development on grounds of Green Belt policy. The importance of the land as a part of the open swathe penetrating into the village was commented upon. I noted that the Objector did not agree with the Inspector's assessment, although I considered that it was evident that this land does "read" with the open land to the north and that this is a particularly significant part of the structure of the village. However, my concern was whether the settlement boundary should be extended to include it. I accepted that the settlement boundary extended to three of its four sides, but on the ground this gave no very strong impression that the site was surrounded by building. Having regard to the criteria for defining settlement boundaries, the land is substantial in size and containing only Gomshall Cottage it has a very low density of development. Its size would rule out the sorts of modest development of the nature of infilling the Policy contemplates.

10.4.127. It was mentioned that there was a demand for housing in the village, particularly for the elderly trading down in the size of their dwellings. The Plan identifies land sufficient to meet the requirements for general housing for the Plan period and I have seen no need to suggest that more is identified to meet Structure Plan requirements. A shortfall in the supply of affordable housing is likely, but the Plan makes what provision it reasonably can and in the villages Policy 99H12 allows some latitude for meeting formally identified local needs for affordable housing. This Policy does not require an extension of settlement boundaries for its purpose.

10.4.128. I, therefore, concluded that, not meeting the criteria, or required to meet a recognised housing deficiency, there was no reason for me to suggest that the settlement boundary be changed to take in this land.

HOLMBURY ST MARY

10.4.129. Holmbury St Mary is one of the smaller identified Green Belt villages, elongated, and occupying the rising land to the west of Horsham Road. While development is continuous, it is somewhat diffuse and a settlement boundary is accorded only to two separate areas where development density is greater than in the remainder of the village.

Ringwood Cottage, Holmbury Hill Road

Objection 1514

Mr B Burgess

10.4.130. The Objection related to Ringwood Cottage, situated on the western side of Holmbury Hill Road, itself in the southern area identified with a settlement boundary, although only the cottage and a part of the garden was included. The remainder of the land attached to the cottage was of a thin triangular shape with a sharp cross fall, in part an extension of the ornamental garden and containing the garage/office. Beyond the grounds contained a more wooded area, within the neighbouring SNCI, and the whole, with the remainder of the village and parts of its environs, a Conservation Area.

10.4.131. The Objector pointed out that the garden was well defined by hedges, the road and the drive to the garage, which, also serving Heathcote, skirts the western side of the garden. The rise of the land gives the garden a certain prominence, standing above a small green, although the opposite side of the green is occupied by the substantial buildings of Pitland Street House to the south and to the east, at a lower level, by a group of cottages.

10.4.132. To the extent described, the garden is within a group of residential curtilages, but not a group of buildings, these only coming to the southern and eastern sides of the green. There is an affinity between the openness of the green and the garden and the open land beyond. The garage/office building, although standing on the higher part of the garden is not widely seen. The Objector did not suggest that if the boundary were extended to take in all, or a greater part of the garden, there would be proposals for further development. Only the reroofing of the garage/office building in more sympathetic tiles was suggested.

10.4.133. My view was that, applying the criteria of the Policy the exclusion of the greater part of the garden from the settlement boundary was justified by the continuity of open land between the green and the woodland beyond the garden. Extending the settlement boundary even to the boundary of the SNCI would open to possibility of building, which even if any proposal would have to satisfy the intentions of this Policy - which envisages only infilling - of those for the Conservation Area and the AONB, there would be the risk of development extending the built area of the village, which could only be of detriment to the objectives of protecting the Green Belt.

NORMANDY and FLEXFORD

10.4.134. Normandy is a sizeable settlement comprising a relatively compact area of development to the south of the railway at Flexford and a further area to the north - Normandy - of mainly frontage development along the A323 and adjacent roads, the two

linked by rather broken frontage development along Glaziers Lane. The two separated areas are accorded settlement boundaries, the Plan proposing a small change from that in the adopted plan to accommodate the Church Hall.

Glaziers Lane

Objection 1108

Mr S Brooks

10.4.135. The Objection related to a field on the eastern side of Glaziers Lane immediately to the north of the railway, diagonally opposite Wanborough station. Ponds associated with a one-time brickworks were to the east. The Objection raised matters concerned with the form of the Policy, particularly that the village should be "inset", considered earlier, and suggested that the site should be allocated for housing as well as being incorporated within a settlement boundary. Supporters of the Plan opposed development of this land, for reasons connected with the interpretation of this Policy - development would not be infilling and therefore contrary to the objectives of the Green Belt - and for various practical and environmental reasons.

10.4.136. Despite the arguments to the contrary, I have considered that there is no need to allocate further land under Policy 99H2 to meet the needs for housing land for the Plan period. In relation to this Policy, it is not my view that settlements should be "inset" in the Green Belt, but they should stay as the Plan proposes "washed over", with no more than development in the general nature of infilling accepted. The site is a large one, with a substantial frontage to Glaziers Lane. While there is development to the south of the railway, and the railway being close to ground level these houses are a visible edge to the village, this is not matched by development to the north, while the site of the former brick works to the east has been largely returned to countryside.

10.4.137. To include so large an open site in the settlement boundary would not be in accordance with the criteria for drawing the boundaries. Development could not be in the nature of infilling situated as it is, while were the site to be developed the result would be a major and very damaging extension of development into an open area of the Green Belt. Further consolidating development in Glaziers Lane, it would also have the tendency to draw the two neighbouring settlements closer together and to make their impact on the Green Belt the greater.

PIRBRIGHT

10.4.138. Pirbright is an L shaped village with the Green and part of the Common enclosed within the arms of the L. The settlement boundary follows this pattern, extending southwards to take in development in Guildford Road and off Mill Lane. The Plan proposed a small change to the boundary of the adopted plan to include the site of the former Red Cross Hall and adjacent houses in Dawney Hill.

(a) Barralets Nursery, Guildford Road

Objections 624,804/5

Ms A Barralet

<i>Objections 806-8</i>	<i>Ms S Barralet</i>
<i>Objections 812-4</i>	<i>Mr P S Barralet</i>
<i>Objections 816</i>	<i>Ms E Barralet</i>
<i>Objections 7,1339,1341</i>	<i>Mrs P M Grundy</i>
<i>Objection 265</i>	<i>Dr R Vaughan Jones</i>
<i>Objections 566/7,573</i>	<i>Mrs M Suter</i>
<i>Objections 568,571</i>	<i>Major F B Suter</i>
<i>Objections 579,583</i>	<i>Mrs L Suter</i>
<i>Objections 599/600,602</i>	<i>Mrs D Henderson</i>
<i>Objections 604,606/7</i>	<i>Mr G Searle</i>
<i>Objections 609-11</i>	<i>Mr E M Newcombe</i>
<i>Objections 613,615,617</i>	<i>Mrs E Newcombe</i>
<i>Objection 625</i>	<i>Mr B Lawson</i>
<i>Objection 628</i>	<i>Mr J M Howard</i>
<i>Objection 629</i>	<i>Mr and Mrs D Pearce</i>
<i>Objections 739/40</i>	<i>Mrs S Y Jackson</i>
<i>Objections 742,746</i>	<i>Mr T Jackson</i>
<i>Objections 747,749</i>	<i>Mrs A Smith</i>
<i>Objections 778,783</i>	<i>Mr R Richmond</i>
<i>Objections 828,849/50</i>	<i>Mrs A R Cribb</i>
<i>Objections 851/2,854</i>	<i>Mr E F T Cribb</i>
<i>Objections 931-3</i>	<i>Mr D Newman</i>
<i>Objections 965,967-70</i>	<i>County Councillor Mrs M Laker</i>
<i>Objections 976-8</i>	<i>Mr K Memery</i>
<i>Objections 986-8</i>	<i>Mr M J Stearn</i>
<i>Objection 981</i>	<i>Mrs L M Gorland</i>
<i>Objections 1012-4</i>	<i>Mrs J M Williams</i>
<i>Objections 1015-7</i>	<i>Mr G Williams</i>
<i>Objections 1018-20</i>	<i>Mrs Wheeler</i>
<i>Objections 1090-2</i>	<i>Mr W G Cranstone</i>
<i>Objections 1097/8</i>	<i>Mr F S J Richards</i>
<i>Objections 1148-50</i>	<i>Mr J Ayling</i>
<i>Objections 1151/2</i>	<i>Mr N Chesworth</i>
<i>Objections 1153/4</i>	<i>Mr J D Chesworth</i>
<i>Objections 1155-7</i>	<i>Mr A I K Ballantine</i>
<i>Objections 1158/63</i>	<i>Mr and Mrs Stephens</i>
<i>Objections 1174,1177/8</i>	<i>Rev R E N Stevens</i>
<i>Objections 1179-81</i>	<i>Ms S J Stevens</i>
<i>Objections 1182-4</i>	<i>Mr P Dovetail</i>
<i>Objections 1230-2</i>	<i>Dr and Mrs J N Wilson</i>
<i>Objections 1233,1326/7</i>	<i>Mrs W E Watkins</i>
<i>Objections 1307-9</i>	<i>Mr E C Baker</i>
<i>Objections 1313,1315/6</i>	<i>Mrs L A Baker</i>
<i>Objections 1340/1</i>	<i>Mrs P M Grundy</i>
<i>Objection 1513</i>	<i>Mr S Fidgett</i>
<i>Objection 2001</i>	<i>Mrs K Mallerhoff</i>

10.4.139. The Objections listed under Pirbright were concerned primarily with the settlement boundary in connection with the now disused Barralets Nursery in Guildford Road, although several Objectors also mentioned other parts of the boundary which were thought to be incorrectly drawn. These are considered separately below. Mrs Mallerhoff mentioned protecting the tennis courts in School Lane, which are not included in the settlement boundary proposed. It must also be said that there were representations in support of the boundary drawn in the Plan, not referred to individually in my Report, which outnumbered the Objections.

10.4.140. On the southern edge of the village in Guildford Road the settlement boundary proposed takes in the recent development of Collens Field and on the north eastern side of the road a small builders yard, Lakers Yard. On the south western side, development to the south of Collens Field is of low density - houses in relatively large plots - extending continuously into Aldershot Road, although in that road fronted by a part of Burner's Heath. On the north eastern side of Guildford Road, from Lakers Yard houses continue to Barralets Nursery and beyond. The houses are on smaller frontages and thus closer spaced than those extending into Aldershot Road, although like them facing on to Burner's Heath. They are, however, more generously spaced than those parts of the village included in the settlement boundary.

10.4.141. The Nursery occupied a sizeable site with a frontage to Aldershot Road on which there is a large showroom and two houses. It was suggested that the settlement boundary be extended south eastward from Lakers Yard to include the houses up to Barralets Nursery, the frontage of the Nursery to a depth somewhat less than that of the gardens of the adjoining houses the two house and a plot beyond.

10.4.142. I could accept that a case could be made to include the properties from Lakers Yard to the boundary of the Nursery, although noting that the Council had considered and rejected this proposition. The Nursery site, even the frontage strip, is, however, of a size that suggests that its development would be more than infilling in the terms of the Policy and that the criteria used to define the settlement boundary given in the Topic Paper (CD16) would indicate it should be excluded.

10.4.143. I could appreciate that if no longer viable as a nursery the future of the site does pose difficulties. Objectors referred to the possible problems that could be associated with a substitute commercial use, others to the danger that the site would become derelict. The particularly favoured use was for housing, to provide housing for younger families who have difficulties in finding accommodation they can afford in the area and/or older people who wish to move from larger houses to smaller dwellings still within the community. Mr Fidgett suggested that the Plan should accommodate the relocation of older people in this way by permitting development beyond settlement boundaries, particularly the reuse of brownfield sites such as the Nursery, for this purpose.

10.4.144. The need identified by the Objectors can be readily understood. It is taken into account by the Plan, in so far as it possible within the terms of the Government's advice. The prime objective in settlements such as Pirbright is, however, the protection of the Green Belt; the development allowed in the villages has this objective in mind, permitting only

development that will not have an adverse effect on the openness of the Green Belt. This means confining new development to infilling within the existing built extent of the village. The village boundary is defined with that objective in mind.

10.4.145. The Plan seeks to accommodate the greater part of the new development required for the purposes of the Plan in the identified urban areas. In my view, taking account of the other sources of housing gain, sufficient land has been allocated to meet the requirements of the Plan period as expressed through the Structure Plan. The allocations are wholly in the urban areas. This Policy permits some modest development in the villages, the definition of settlement boundaries being an instrument for controlling both the location and the scale of this development. Policy 99H12 permits affordable housing to be built for local needs outside settlement boundaries, but in strictly limited circumstances. It would not include the smaller sized market housing the Objectors appeared to be proposing and a concession in this direction could not be made a policy of the Plan without going against Government advice.

10.4.146. My conclusion is that, because of the size and location of the site in a ribbon of quite loose development; the criteria for drawing settlement boundaries could not reasonably be interpreted to include even the frontage of the Nursery and I am not recommending a change to the settlement boundary along Guildford Road. The future of the Nursery is a problem, but the site has a commercial use which would allow new uses, while there are uses that are considered "appropriate" in the Green Belt. These are, I accept, necessarily limited, but the Council has it within its power to consider whether in any particular instance there are very special circumstances that might permit some other use or development.

(b) Other parts of the settlement boundary for Pirbright

10.4.147. Objectors pointed to a number of locations where residential development recognisably part of the village had been excluded from the settlement boundary. These areas included a small area in Church Lane, a more substantial area including an Abbeyfield development and the school in School Lane, a row of houses in The Garden and development extending southeastwards along Chapel Lane.

10.4.148. I viewed these areas, but came to the conclusion that the development in most instances was of a density and disposition that to include it in the settlement boundary would go against the criteria of definition and have the potential of opening land to development that could significantly extend or intensify building to the detriment of the Green Belt. The Gardens was an exception, but this is a small, detached group of houses separated from the main area of the village and reasonably excluded for its small scale and isolation.

RIPLEY

West End Cottages

Objection 1802

Ashdale Land and Property Co Ltd

10.4.149. Ripley is one of the more substantial Green Belt villages, having a good spread of facilities and in its centre something of the character of a small country town. The Objection related to a site of about 0.4ha off High Street, formerly the A3, on the south western side of the village. The part of the site closest to the road is occupied by two blocks each containing three cottages, set at an angle to the road, the access way between the blocks giving on to open land at the rear. This part of the site adjoins the cemetery attached to St Marys Church to the north east and fields to the south and south east.

10.4.150. As drawn in the Plan, the settlement boundary takes in the cottages and their gardens, but not the undeveloped part of the land, nor the cemetery. The Objectors considered that it would be possible to add a further pair of cottages within the settlement boundary by taking some of the cottage gardens, although they were concerned to extend the bounds in which development might take place to include all or part of the undeveloped area. This was seen to offer the opportunity to provide sheltered or affordable housing for the benefit of the village.

10.4.151. There was comment that Paragraph 5.64 of the Plan was not reflecting the current advice on the provision of affordable housing for Green Belt villages, which was accepted by the Council and I have recommended that a change be made to bring the Plan in line with the current advice and allow such housing to be provided outside settlement boundaries in the Green Belt. I have noted that there is a shortage of affordable housing in the Plan area, which is likely to persist despite the proposals of the Plan. The development of such sites - the rural exception sites - is, however, only to be justified by identified local need, the advice, and the Plan, looking to the provision of affordable housing in general mainly in the urban areas.

10.4.152. Were the site to be accepted for development as a rural exception site it would need neither to be within the settlement boundary, nor allocated for development in the Plan. It was, nevertheless, argued that the exclusion of the site from the settlement boundary was, in any case, an anomaly. Its close relationship to development in High Street, the adjacent cemetery being a community use, and the proximity of the development in Rose Lane were seen to justify inclusion. My view was that the Council had defined the boundary accurately in relation to the criteria. The cemetery is distinct from the Church, which is sited on High Street, and appropriately excluded from the settlement boundary, if essentially within the same curtilage. Dwellings in large grounds are treated by the Plan in the same way. With the south eastern part of the site and the adjacent fields the cemetery forms the open area between High Street and Rose Lane rather than being a part of the built area the village. I took no view on the merits of the various schemes for development I was shown and saw no sufficient reason to recommend a change to the settlement boundary in relation to the cemetery or this site.

SEND

(a) Send Lodge, 1 Send Road

Objection 3 *Mr N Picken*

10.4.153. Send Lodge is located on the northern side of Send Road adjacent to the River Wey Navigation, which borders the garden on the western side of the Lodge. The settlement boundary has been drawn to include the Lodge, but not the garden, repeating the boundary line of the adopted plan.

10.4.154. As I have said before, the settlement boundary is not defining the village as a community, nor even its pattern of land uses and it is not inconsistent for the boundary to separate houses from their gardens, if thereby the purposes of the Policy to protect the Green Belt from inappropriate development is served, while allowing some modest continuing development in Green Belt villages. I could see that there was a case for extending the settlement boundary to the Navigation in this instance, but to do so would offer the opportunity to extend the development of the village to the bank of the Navigation in circumstances which would not be infilling as described for the purposes of the Plan. At present the bridge over the Navigation affords views across the garden to the countryside along the Navigation beyond the village - the village stops short of the Navigation at this point - and to my mind the settlement boundary has been correctly drawn.

(b) Old Granary and Ethelburt, Bush Lane

Objection 88 *Mr R A Leach*

10.4.155. The two dwellings are situated at the southern end of Bush Lane, a narrow road leading off Send Hill which also serves a secondary school and housing on its eastern side. To the east of these houses and those of the Objection site are houses in Send Barns Lane. The settlement boundary includes the houses, but excludes the school and the Objection site.

10.4.156. The Objection site and the school are on the southern boundary of the village at this point with open land to the south. The school, while a relatively large building complex is clearly separated from the main built up area in quite spacious surroundings and having regard to the criteria for drawing the settlement boundaries, it would be expected that it would be excluded. The Objection site is less clearly separated from the main built up area, but the two houses are in gardens substantially larger than their neighbours and present a transition between the core of the village and the countryside to the south.

10.4.157. Among the purposes of the settlement boundary is to define areas in which further modest development could take place without damage to the objectives of the Green Belt. I could see that if an intensification of development were to take place on the Objection site there would be a change in character of this low density peripheral area, the effect of which would be to give the impression that the built area of the village was being extended further to the south. I noted that, although now some years ago, an appeal was dismissed on similar grounds. The situation has not to my mind changed sufficiently in the intervening period to make me think that the settlement boundary as defined in the Plan is wrong.

(c) Send Barns Lane

Objection 685 *Ernst and Young*

10.4.158. The Objection proposed the extension of the settlement boundary for Send southwards along the western side of Send Barns Lane to take in Send First School, the row of eight detached houses to its south and beyond those a rectangular paddock of a little over 1ha, the Objection site. Beyond that a scatter of well spaced houses and farm buildings extends into Woodhill.

10.4.159. In the Objectors view, the settlement boundary as proposed in the Plan did not allow sufficient scope for infilling in Send and that the Objection site should be included to allow some development to take place. However, I have not considered that it is necessary to allocate more land than is proposed by the Plan for housing in the Plan period. The settlement boundaries are drawn to allow scope for some infilling in the Green Belt villages, but to protect the objectives of the Green Belt, in so far as they are not drawn to permit the expansion of villages beyond their present built extent.

10.4.160. I could see a case for extending the boundary to the school and the houses to the north of the Objection site, this row of houses being similar in character to those to the north of the school. However, at this point there is significant development only on the western side of Send Barns Lane and the case for including these properties in the settlement boundary is accordingly weakened. The development of the Objection site would not be in the nature of infilling, even by the definition used for the purposes of this Policy, and would constitute a clear extension of inappropriate development into the Green Belt.

10.4.161. In my view, the boundary as drawn in this part of the village is not inconsistent with the objectives of the Policy, nor with the general advice for the protection of the Green Belt. In the absence of a need to allocate further land for housing I could see no justification for recommending allocation of all or part of the Objection site or a change in the settlement boundary in this part of the village.

(d) Vision Engineering

<i>Objections 1273/4, 1277</i>	<i>Vision Engineering Ltd</i>
<i>Objection 1053</i>	<i>Mr G C Salmon</i>
<i>Objection 1103</i>	<i>Mr G E Mansbridge</i>
<i>Objection 1104</i>	<i>Mrs M Mansbridge</i>
<i>Objection 1922</i>	<i>Mr and Mrs A H Finn</i>

10.4.162. Vision Engineering Ltd occupy factory premises on the north eastern side of Send Road, with mainly frontage residential development to the east and frontage development and a small residential curtilage to the west. Between the backs of this development and the River Wey Navigation is undeveloped land which appeared to have an informal recreational use, save towards the eastern end where a Scout Hall and a small modern housing development abutted the Navigation, served from Send Road by Sanger Drive. A further area of open land separated this development from the houses in Send Road, bordered to the east by houses in Wharf Lane. It was my understanding that this development had made use of a former industrial site.

10.4.163. The Plan made a small adjustment to the settlement boundary of the adopted plan by including the whole of the buildings on the Vision Engineering site. Otherwise the boundary was drawn to the curtilages of the Send Road and Wharf Lane properties, excluding those of Sanger Drive. The Objectors proposed the inclusion in the settlement boundary of all of the land between the boundary proposed by the Plan and the Navigation, from the Vision Engineering premises in the west to Lavender Cottage and Wharf Cottage beyond Wharf Lane to the east. Several Objectors supported the change on the basis of a proposal recently refused planning permission, which would have provided a new village hall and doctors surgery, 24 houses and some further extensions to Vision Engineering's buildings.

10.4.164. I have accepted that in the identified settlements in the Green Belt, in pursuit of the objectives of the Green Belt, the settlement boundaries should be drawn to permit no more than the limited infilling and small scale development substantially surrounded by the development of the village, as the Policy envisages. In this part of Send the boundary has been drawn to define the main area of development along Send Road and in Wharf Lane. With the exception of Sanger Drive, the land in the Objection site is predominantly open and clearly outside the village. Development on any scale, which so large an addition to the open land included in the boundary could make possible, would extend the built envelope of the village, contrary to Green Belt objectives and those of this Policy.

10.4.165. I could appreciate that Sanger Drive was a relatively compact development, the inclusion of which in the settlement boundary would not open undue opportunities for further infilling or intensification. The area is somewhat detached from the main part of the village, although more clearly joined at its eastern end by the development in Wharf Lane. The three cottages at the northern end of Wharf Lane that form the link are, however, much more spaciouly sited than the neighbouring properties, and while they themselves would not qualify for inclusion in the boundary, my feeling was that even if a detached part, the houses of Sanger Drive should be within a settlement boundary drawn around their curtilages.

CHAPTER 10. RECOMMENDATION 5.

10.4.10. That the settlement boundary for Send be drawn to include the houses of Sanger Drive (but not Heath Field or the adjacent houses in Wharf Lane).

(e) Pembroke House, Potters Lane

Objections 1467-9

Mr and Mrs J V Hawkins (Mr and Mrs Bamber)

10.4.166. Pembroke House is situated in large grounds between the western side of Potters Lane and the River Wey Navigation. To the north and south, the western side of the Lane is lined with frontage development on considerably more modest plots, Pembroke House being set back from the Lane close to the banks of the Navigation, its grounds abutting the Lane.

10.4.167. The settlement boundary proposed includes the adjacent frontage development, but excludes Pembroke House. The suggestion was to include the frontage of the site to the approximate depth of the adjoining houses to the north. In support, it was said that this land was surplus to any reasonable requirement for a garden for the house (being about 0.5ha in area, the site as a whole being some 1.75ha) while it was reasonably seen to be in the built-up area of the village and not an extension of its envelope. Allowing development would provide opportunities to accommodate the organic growth of the village, add support to local services and thereby restrain the growth of road traffic. It was pointed out that the site of a former laundry on the bank of the Navigation immediately to the north had recently been redeveloped for housing.

10.4.168. The criteria used for the definition of settlement boundaries in the identified settlements in the Green Belt (CD16) reflect the intention of PPG2 that in "washed over" villages only development in the nature of infilling should be permitted. The Plan enlarges on what is meant by infilling, but it is development small in scale that is within the main structure of the village. The considerations of the scale of development and village structure tend to rule out development on larger sites or sites that if developed would extend the built envelope of the village. That has been the Council's rationale for excluding the site of Pembroke House and I do not see that this definition of the boundary was wrong.

10.4.169. The proposal was that only the frontage be included, but the same considerations apply to this part of the site as to the whole, it is too large for development to be seen as infilling, or even as small scale in a village context. The Policy does not prevent further gradual growth in the village, and the points that this can support the local community and its services can be accepted. However, more substantial growth is necessarily directed to the urban areas, where it is more sustainable and the Green Belt is not put under threat. Sufficient land has been identified for the requirements of the Plan period. I do not consider that there is a sufficient case to recommend changing the settlement boundary.

(f) Former Burt Boulton Depot, Send Road

Objections 1168,1762

Burt Boulton Holdings Ltd

10.4.170. The Objection related to a large rectangular site on the north eastern side of Send Road, much of it formerly a depot, consisting of various mainly single storey buildings and extensive paved areas, now vacant, the frontage to Send Road being occupied by a commercial garage. The rear part of the site is a somewhat overgrown field. The settlement boundary excludes the site, but takes in frontage development to Send Road and behind it recent development off Send Marsh Road adjoining the south eastern boundary of the site.

10.4.171. The Objectors considered that the whole of the site should be included in the settlement boundary, pointing out that it was developed land and central to the village of Send, not a peripheral site. The view of my predecessor that the Vision Engineering premises should be included in the settlement boundary was put forward as a parallel case, the Objection site not having been before his Inquiry. Points were made in relation to the Employment Chapter which were considered there, although I noted that the Council agreed that this should, for the most part, be seen to be a brownfield site in the terms of PPG3.

10.4.172. I could appreciate that the criteria for the drawing of settlement boundaries sought to exclude sites in commercial or non-residential use on the edge of settlements, such as schools, recreation grounds and nurseries. As my predecessor, I see this "rule" as needing a pragmatic interpretation when it comes to commercial premises within or on the edge of villages, noting the intention of the Plan to retain such uses and to permit modest employment development in the identified settlements. In so far as this site extends to a much greater depth and its north eastern part is predominantly open, it is not a close parallel with the Vision Engineering site, but there is justification for including the built part and the frontage premises in the settlement boundary.

10.4.173. I, therefore, recommend that the settlement boundary be drawn to include the buildings and to exclude the paved parking area and the field, roughly the north eastern half of the site. This land has an affinity with the open land to the north, although there are thick hedges on the boundaries. The Objectors had also suggested changes to Paragraph 6.26 to give housing as an alternative use for redundant employment land. I have not accepted that suggestion, seeing the future use of land as something that needs to be determined in relation to the circumstances of the site.

CHAPTER 10. RECOMMENDATION 6.

10.4.11. That the settlement boundary for Send be drawn to include the south eastern part of the site of Burt Boulton Holdings Ltd (to the north eastern extent of the buildings) and the commercial garage on the frontage to Send Road.

SEND MARSH/BURNT COMMON

Marlborough Gate/Send Marsh Road

Objection 208

Alfred McAlpine Ltd & Trenfold Ltd

10.4.174. The settlement boundary for Send Marsh includes the greater part of the developed area of the village, but excludes all development to the north of Send Marsh Road. This cuts off development on the northern side of Send Marsh Road and The Green and, further north, development in Polesden Lane, the recently built houses of Danesfield and adjacent employment units. The boundary was the same as that in the adopted plan.

10.4.175. The Objectors pointed to the changed situation in this part of Send Marsh now that the Danesfield development had replaced the earlier Sendmarsh Works and the Rio Works site had been redeveloped. These sites had contained major buildings, but also open land and with the relatively low density of the houses to the north of The Green there had been justification in the criteria for defining the settlement boundaries for this northern area to be excluded. That no longer applied and it was suggested that the settlement boundary be extended to this developed area and also to a broadly L-shaped site, adjacent to the Objection site, off Send Marsh Road.

10.4.176. The Objection site has an area of about 3ha. At the time of the Inquiry it was vacant, cleared of buildings and becoming overgrown. In the past it had apparently been kennels and a builders yard. The suggestion was that if there were a requirement to allocate more housing land this site had the advantages of being a brownfield site, closely related to a settlement in which there was a reasonable provision of facilities. Development would not significantly extend development further into the open areas of the Green Belt. Parallels were drawn with the Danesfield site.

10.4.177. As I have said earlier, there is in my view no need to allocate further land for housing for the Plan period and therefore no need to seek further sites for housing use. Were there a need, this site would have features that would make it worthy of consideration, but it would need to be viewed in the light of other sites that might be available and their relative advantages. I could see no persuasive case for the inclusion of the Objection site in the settlement boundary and at present the site by its openness serves a Green Belt function; development for residential purposes would not be for an appropriate use of land in the Green Belt.

10.4.178. Whether the changes that have taken place on neighbouring land since the adopted plan was drawn up justify changes to the settlement boundary was another matter. The Danesfield development has given greater weight and form to the northern end of the village. However, there remained a strong argument against including the development in this area because the relatively spacious settings of The Willow Pool and The Manor House to the north of The Green and the smaller houses to the east continued to separate the Danesfield site from the denser development of the remainder of the village. I considered that there was in these considerations sufficient to support leaving the settlement boundary where it was.

SHERE

Shere Manor Kitchen Garden

Objections 1463/4

Shere Manor Estate

10.4.179. The Kitchen Garden was, as its name implies, the garden of the Manor House, originally adjoining the House, although once a new House was built in the 1840s, linked by a bridge across Upper Street. In recent years the garden has become disused. However, it occupies a broadly L shaped site between Upper Street and the Tillingbourne running eastward behind properties in Upper Street to the rear boundaries of those in Middle Street. To the west, while in residential use, the development is more open, extending to the countryside in Rectory Lane. The settlement boundary proposed in the Plan excludes the site and the land to the west, while taking in the development of Union Street, Middle Street and to the south of the river in Lower Street.

10.4.180. The Objection suggested the inclusion of the site in the settlement boundary, although not with the implication that it should all be developed. A scheme for retirement housing by English Courtyard was put forward as a way in which the eastern part of the land

adjoining the development in Upper Street and Middle Street might be developed, with the western part of the land and the stretch adjoining the Tillingbourne being devoted to open space. The benefits of such a development at the centre of the village were seen to be meeting a local need for retirement housing and the support this could give to village services and facilities.

10.4.181. There is one of the most attractive villages of Southern England and the role of the Estate in maintaining its character and appearance over the generations was evident. I could appreciate that the Estate would wish to respond to what it saw as current needs in a no less sensitive way. My concern was not, however, with the merits or otherwise of the particular proposal put forward, the Plan could not reasonably specify that a development by a particular developer take place, but with the position of the settlement boundary. I considered that having regard to the criteria for defining the boundaries, and disregarding its lengthy planning history, the greater part of this largely undeveloped area, extending as it does as a tongue of open land from the countryside to the west, was reasonably excluded.

10.4.182. The land at the eastern end of the site differed in character from the remainder, having the feel of being related more closely to the adjoining development. I noted that my predecessor at the 1992 Local Plan Inquiry had recommended a small change to the settlement boundary to include the eastern part of the site, a recommendation the Council rejected. I do not repeat that recommendation, accepting the Council's view that it is essentially a part of the tongue of open land rather than a part of the built up area of the village. It has been commented in relation to the Policy in general that while its objective is to protect the Green Belt from inappropriate development, the Plan does permit some development beyond the settlement boundaries, including affordable housing for local needs.

WEST CLANDON

(a) Newlands, Oak Grange Road

Objection 33

Dr C T Patrick

10.4.183. The land concerned in the Objection, a rectangular site with an access to Bennett Way, was formerly part of the garden of Newlands, a detached house fronting Oak Grange Road. The site is within the developed area of West Clandon, but the settlement boundary proposed by the Plan has been drawn to distinguish between the more closely developed areas to the north of the railway and those of more spacious form. The settlement boundary includes the development of Bennett Way and the houses to the west of Newlands in Oak Grange Road, but not Newlands itself, nor the Objection site.

10.4.184. The Objection envisaged the erection of one house on a site similar in size to others in Bennett Way, with which the further house could be seen to fit. An amendment to the settlement boundary to take in the site would facilitate the development. However, while defining a settlement boundary for West Clandon, where much of the development is of low density, does present some problems, the boundary at this point does mark a substantial difference in the intensity of development. I noted that an access point had been provided to this land when the Bennett Way development was built, although this seems to have been

a prudent act by the developer rather than indicating any intention that the Objection site should be developed on the part of the planning authority. It appeared to me that the settlement boundary had been drawn correctly. As I have said above, there is in my view no need to identify further land for development in the Plan period and, therefore, to consider allocating this land for housing development, or adjusting the settlement boundary to take in vacant land that would not otherwise meet the criteria for inclusion.

(b) Sheldon, Lime Grove

Objections 1474/5

The Estate of J E Allcard deceased

10.4.185. Sheldon is a detached house standing in a rectangular plot of about 0.2ha at the eastern end of Lime Grove, a cul de sac serving residential development in the northern part of the village. The settlement boundary proposed in the Plan includes the development of Lime Grove and the further culs de sac that lead off it, but excludes Sheldon and the residential area to the east.

10.4.186. The submissions were that Sheldon should be included in the settlement boundary, but that beyond that, there was a case for including all of the developed part of West Clandon north of the railway in the settlement boundary. This would, in the Objectors view, allow opportunities for modest further development in the nature of infilling and redevelopment that would facilitate the organic growth of the village and continuing support for its facilities and services, without necessarily damaging its character, or impinging on the Green Belt.

10.4.187. I could accept that including the lower density development of the village within the Policy area might not open the way for substantial change immediately, but the pressures for development in the Green Belt villages of the Plan area are substantial and the policy of the Plan is to support the Green Belt objectives by allowing only limited development to take place. Sufficient land is identified for the Plan period, primarily in the urban areas, for a requirement to seek significant housing gains from the Green Belt villages to be unnecessary. It appeared to me that the Council was correct to confine new development in the villages to the modest and small scale, the intention of this and its allied Policies.

10.4.188. That intention was the justification for drawing settlement boundaries in such a way that the opportunities for larger scale development were excluded. The Policy boundaries did not seek to define the physical or community extent of a village. There was, therefore, good reason to omit the lower density areas of development, where, in villages such as West Clandon, the open aspect of the Green Belt is maintained by the large and well wooded grounds of many of the houses.

10.4.189. In the case of Sheldon, there was a clear distinction between this house and its neighbours in Lime Grove, smaller and on smaller plots, the property having much more in common with the houses to the east in Malacca Farm and Oak Grange Road. I did not, therefore, see that the Plan was wrong to draw the boundary as proposed, nor that a change should be recommended.

(c) Land at Cuckoo Farm

Objection 1954

Persimmon Homes

10.4.190. The Objection related to farm land of approximately 9.2ha on the west side of The Street to the south of the railway station. The suggestion was that it should be included in the settlement boundary. Objection was also made to Policy H1, that insufficient land was allocated for housing development, there being an over-reliance on unidentified sites.

10.4.191. This land, it can be accepted is in a central position in relation to the general form of West Clandon, lying between the two areas identified with settlement boundaries. It also adjoins the railway station. It is, nevertheless, a considerable area of open land in the Green Belt where housing would not be appropriate development. I determined earlier that in my view there was no need to allocate more land for housing to meet the needs of the Plan period. The criteria for defining settlement boundaries given in CD16 would clearly exclude this large open area which is directly linked with the countryside to the east of the village. I could see no basis for including this land with its substantial development potential in the settlement boundary, the Plan seeking only modest further development in the Plan period in the Green Belt villages.

WEST HORSLEY

Cranmore Lane

Objection 1071

Mr P Witting

10.4.192. The settlement boundary of West Horsley is defined to include the relatively densely developed core of the village, but to exclude land to the east in Little Cranmore Lane. The Objector pointed to the one-time importance to the village of the Lane, although development along it is now sparse, and asked that the settlement boundary recognise the historic form of the village and be extended to take in the land along the Lane.

10.4.193. As has been remarked earlier, the settlement boundary is drawn for policy reasons and is not intended to define the extent or the community of a village. Permitting modest development to take place, it is important that the objective of protecting the Green Belt is observed, and to this end, land is not included in the settlement boundary which might allow an extension of building into the Green Belt. The criteria set out in CD16 for defining the boundaries have this objective in mind.

10.4.194. The extension of the boundary proposed by the Objector would take in a substantial area of undeveloped, or only sparsely developed land on the eastern edge of the village. If as a result of inclusion this land were to become more intensively developed, and in the Green Belt villages that pressure is ever present, considerable harm to the Green Belt could result. To my mind, there was not a sufficient case for extending the boundary as suggested.

WORPLESDON

(a) Church Lane

Objection 235

Crown Hall Estates Ltd

10.4.195. The settlement boundary of Worplesdon is drawn around the denser development of the village in and around the A322, excluding the relatively low density area on the eastern side of the village, among them the houses of the Church Lane Estate. The Objector considered that the boundary should be drawn to include this lower density area and thereby to take in practically the whole of the developed land of the village.

10.4.196. My predecessor in 1992 considered a broadly similar Objection and came to the conclusion that the development on the eastern side of the village should be included in the settlement boundary. I had no difficulty in accepting his view that this area is essentially a part of the village, but saw a distinction between this area of well spaced houses in relatively large gardens and the denser development within the proposed settlement boundary. It was not my view that the settlement boundaries drawn under this Policy were intended to define the village, but had the narrower purpose of defining the areas in which modest development might take place without harm to the objectives of the Green Belt. That appeared to me to justify excluding areas in which the Policy might permit development which could have the effect of reducing the openness of the Green Belt. The Church Lane Estate would demonstrate that possibility.

10.4.197. I have, therefore, concluded that the boundary proposed by the Plan is the correct one and do not recommend that it be changed.

(b) Automatic Telephone Exchange

Objection 399

British Telecommunications Plc

10.4.198. The Telephone Exchange is on the edge of the lower density area in the east of Worplesdon, being on the corner of Church Lane and adjoining the settlement boundary proposed by the Plan. However, while the building of the Exchange occupies a large part of its site, it is of essentially the same character as the housing of Church Lane. I have noted that my predecessor considered that the Exchange, along with the development of Church Lane, should be included in the settlement boundary. I do not disagree with his assessment of the area as a recognisable part of Worplesdon. However, for the reasons given in relation to the previous Objection I do not consider that this lower density residential area should be included and do not recommend that the boundary be extended to take in the Telephone Exchange.

PROPOSED NEW POLICY (99RE15) MAJOR DEVELOPMENT SITES IN THE GREEN BELT (MDS)

10.4.199. The revised edition of PPG2 (January 1995) made two particular changes to Green Belt policy, the first to remove from the list of "appropriate" development "institutions standing in extensive grounds". The same controls of development were to be applied to such institutions as to other development in the Green Belt. The second change was to give recognition to existing major developed sites in the Green Belt, including among "appropriate" development limited infilling or redevelopment on such sites where identified in local plans, but subject to closely defined constraints.

10.4.200. The Structure Plan expounded the policy of the superseded version of PPG2 (Structure Plan Policy PE2). The Plan as deposited contained no Policy for MDS. This gave rise to a number of Objections.

Objectors

<i>Objection 562</i>	<i>Wey Estates</i>
<i>Objection 1284</i>	<i>Merrist Wood College</i>
<i>Objection 1430</i>	<i>Thames Water</i>
<i>Objection 1470</i>	<i>BTR Siebe (Vokes Filtration Ltd)</i>
<i>Objection 1704</i>	<i>The College of Law</i>
<i>Objection 1754</i>	<i>HM Prison Office</i>
<i>Objection 2035</i>	<i>National Rifle Association</i>

The Council in response proposed adding a MDS Policy (PC103), which gave rise to a number of further Objections, concerning omissions from the list of Sites identified, or the boundaries of the four mentioned in the Policy.

Objectors

<i>Objection C22</i>	<i>Institute for Animal Health, Pirbright (CW)</i>
<i>Objection C40</i>	<i>The College of Law</i>
<i>Objection C55</i>	<i>Starclass Properties</i>
<i>Objection C159, C160</i>	<i>CPRE Surrey</i>
<i>Objection C226</i>	<i>Enfranchise 302 Ltd</i>
<i>Objection C47, C231</i>	<i>Vokes Filtration Ltd</i>
<i>Objection C238</i>	<i>Thames Water</i>
<i>Objection C239</i>	<i>National Trust</i>

10.4.201. The Objections also raised a number of general points about the identification of MDS, the principles of identifying boundaries and the form of the Policy. These are considered first, followed by a consideration of the issues arising in respect of individual sites listed in the Policy and others proposed by Objectors to be added.

1. Consideration of the Policy

10.4.202. The Council gave the background to the new Policy in Topic Paper CD17, Major Developed Sites in the Green Belt. PPG2, which devotes Annex C to the subject, gives precise, detailed advice on many aspects of MDS, particularly the definition of boundaries and the development which might be permitted. On other aspects it is not wholly clear, as several Objectors pointed out. It is not very specific on the actual identification of MDS, leaving this largely to local planning authorities, having regard to the general tenor of the advice.

10.4.203. PPG2 referred to a number of examples of development that might qualify, terming them substantial sites. Beyond that, there is reference to opportunities for limited infilling (where it can secure jobs and prosperity without prejudicing the Green Belt) and redevelopment, offering the opportunity for environmental improvement without adding to their impact on the Green Belt. The implication is that the planning authority should arrive at a judgement as to whether one or another of these is possible. The Topic Paper included these three matters as the criteria for the selection of MDS. It was proposed to include an edited version of the criteria as an introduction to the Policy, summarised as:-

- (a) Sites should be substantial and developed;
- (b) Sites should have a developed core;
- (c) Sites should have scope for environmental improvement.

10.4.204. Mr Yendole of Robert Shaw and Partners representing Merrist Wood College, usefully prepared a schedule of the factors used in identifying MDS in the local plans of other Surrey authorities. They followed essentially the same route as proposed for the Plan, although in some instances included other factors, of which single ownership was one and another the setting of minimum areas for sites and floorspace in qualification of "substantial". That MDS status might be a factor in "securing jobs and prosperity" was seen as subservient to the protection of the Green Belt and not as a factor in identification of MDS, although in some instances it would be implicit.

10.4.205. I could see the convenience of having actual figures by which to determine whether a site qualified for MDS status, but, looking at the purposes of the Policy in relation to MDS and the protection of the Green Belt, I was less certain that it was to be preferred to a more subjective approach. The factors identified by the Council may be open to interpretation in individual cases, perhaps to include subsidiary matters such as ownership and the dispersal of development within a site, but they appeared to me to be appropriate and within the bounds and spirit of the advice.

10.4.206. Within the Policy itself the development which may be permitted is divided between infilling and redevelopment. This is drawn from PPG2 and the requirements under each heading repeat those of paragraphs C3 and C4. For the purposes of infilling, which is for a continuing use, a boundary of the present extent of development is to be defined within which it might take place. It was suggested that this boundary was not intended by the advice

to do more than this, for example, to identify the MDS, or to be applicable to the location of redevelopment. This appeared to be right. The advice does concern itself with the footprint of redevelopment, but not necessarily require location on the original site, if another could be more beneficial to the openness of the Green Belt, or the quality of the landscape.

10.4.207. The Plan is, therefore, to my mind correct in listing the MDS in the Policy and identifying the sites on which infilling might be contemplated on the Proposals Map. It is, however, going too far to include redevelopment as confined to these boundaries. The Policy would be better reframed to include the second paragraph, less the reference to redevelopment, beneath the heading "1. Infilling" as suggested in the recommendation.

10.4.208. PC103 included a reasoned justification for the Policy. This appeared to be largely taken from PPG2. Some points arose from it, notably the requirement that if partial redevelopment is proposed it should still be put forward in the context of comprehensive, long term plans for the whole site. It was pointed out that a MDS might not be in a single ownership. One of the MDS to be proposed in the Plan was in several ownerships and a comprehensive plan could prove impracticable to achieve. This case is considered below, but the requirement comes directly from the advice and while it may be appropriate in some cases to adjust the need to the circumstances, it should to my mind be included.

CHAPTER 10. RECOMMENDATION 7.

10.4.12. That PC103 be made, subject to further changes contained in the recommendations that follow.

10.4.13. That the second and subsequent paragraph of the Policy be reworded:-

1. INFILLING.

WITHIN THE SITES DEFINED ON THE PROPOSALS MAP LIMITED INFILLING WILL BE PERMITTED WHERE IT WOULD:-

(A) HAVE NO GREATER IMPACT ...

2. REDEVELOPMENT WITHIN THESE SITES WILL BE PERMITTED WHERE IT WOULD:

(A) HAVE NO GREATER IMPACT ...

10.4.14. That the Policy be included with other Policies relating to the Green Belt.

2. Objections relating to MDS proposed by PC103

- (a) BTR Vokes, Normandy

Objector

Objections 1470, C47, C231

BTR Siebe (later McLeod Russel Plc)

10.4.209. The premises at Henley Park, Pirbright Road, Normandy, are a substantial, but compact industrial complex in a wholly rural location. They occupy a site of a little under 9ha and have a building footprint of about 19,000sqm. The premises appear to be fully occupied and have recently been granted planning permission for extensive rebuilding. The inclusion of the site in the Policy as a MDS was not in dispute, but there was discussion as to the precise boundary to be shown on the Proposals Map. This appeared to be resolved by the exclusion of areas of landscaping, while including land in the rebuilding proposals and an adjoining cottage occupied by security staff.

10.4.210. I saw no reason to disagree either with inclusion, or the boundary agreed and recommend that in place of the boundary proposed in PC103, the revised boundary be shown on the Proposals Map.

CHAPTER 10. RECOMMENDATION 8.

- 10.4.15. That for the plan included in PC103, Plan B attached to the Council's letter of 11 August 2000 (MWE/LP95/3) be substituted (PCX12).

- (b) HM Prison, Send

Objectors

Objection 1754

HM Prison Service

10.4.211. The Prison occupies a substantial site in the countryside at Send to the east of Guildford. As well as the compact development of the Prison itself there is a small ancillary area of staff housing and a plant nursery, much of it under horticultural structures. The site is of about 5.75 ha and the main building footprint some 26,000sqm, although I noted that there had been extensive rebuilding of the accommodation blocks in recent years and this figure may now be an underestimate.

10.4.212. Inclusion of the site as a MDS was not disputed, but issue arose as to the boundary to be shown. The Objectors wished open land between the Prison and Ripley Road to the south of the access drive to be included. This land is within the security fence of the Prison. CPRE Surrey sought removal of the horticultural area.

10.4.213. I have regarded the boundaries as essentially a device to control infilling. With that prime purpose in mind, I do not consider that the boundary should be drawn to include

land on which infilling within the definition of the Policy could not take place, because it is not land that by any stretch of the imagination could be considered a small gap between built development. The horticultural area is largely built upon, if some of the structures are temporary polythene tunnels, and is reasonably included. While within the Prison, in so far as that is defined by the high security fence, the sports pitch is open and has building on only one side. To extend building to it, other than as a part of a comprehensive scheme in which there would be an overall gain to the openness of the Green Belt and a landscape benefit, would go against the principles on which MDS are defined. I supported the Council's view as to the boundary of the MDS.

(c) Research Laboratory, Pirbright

Objector

Objection C22

Institute for Animal Health

10.4.214. The premises of the Institute for Animal Health occupy a large site to the east of Pirbright. Much of the site is farmland, but there is a substantial laboratory complex and some ancillary residential accommodation. This part of the site covers some 10ha, with a developed footprint of about 13,000sqm.

10.4.215. The designation of the site as a MDS was supported, and it would appear to be very much the sort of establishment the advice had in mind. The Objections concerned the boundary to be defined, on which the Council came to agreement with the Objector. I recommend that this agreed boundary be included in the Plan.

CHAPTER 10. RECOMMENDATION 9.

10.4.16. That for the plan included in PC103 the subsequently agreed plan referred to in the Objector's letter of 22 February 2000 be substituted.

(d) Peasmarsh Industrial Estates

Objectors

Objection C55

Starclass Properties Ltd

Objections C159/60

CPRE Surrey

Objection C226

Enfranchise 302 Ltd

Objection C229

Mr J F Jackman

Objection C239

National Trust

10.4.216. What is known as the Peasmarsh Industrial Estates forms a substantial employment area between the Old Portsmouth Road and the River Wey Navigation, immediately to the south of the small settlement of Peasmarsh. They have a total area of about 8.5ha and a development footprint of about 18,000sqm, comprising three industrial estates a joinery yard and a petrol filling station, apparently in different ownerships. There

has been extensive redevelopment of the different sites, much of the estates being of recent construction.

10.4.217. There was general support from the owners of the different estates for the proposed MDS designation, and Objection to the boundaries suggested, but the Objections gave rise to several matters of interest. One view was that so much of the site having been redeveloped in recent years, the boundary should only take in that part which awaited redevelopment, the Astrolat site. The Council did not see this as an appropriate approach, and I agree, particularly as the boundary is primarily a control for infilling and it would be wrong to say that there is no remaining scope for this in the redeveloped part of the estates. The boundaries of redevelopment would seem likely to be limited by the physical extent of the estates and the key to what might be undertaken is in the criteria of the second part of the Policy.

10.4.218. A further view was that rather than make the site a MDS, it and Peasmarsh adjoining should be made an identified settlement in the Green Belt. Policy 99E2 would permit redevelopment and infilling in the estates on less onerous terms than in a MDS. I could see the advantages of this approach for the estates, but the definition of settlements is primarily based on their residential status, the services and facilities they can provide and general considerations of "sustainability". As a settlement, Peasmarsh does not qualify and I would not see the distortion of the designation to meet this other purpose as appropriate.

10.4.219. One Objector was concerned that the requirement for partial redevelopment, as for one of the estates alone, was in a context of long term plans for the whole site. With a number of main ownerships this could prove an onerous requirement. In this instance, in so far as the structure of the estates seems now well determined, I saw this as more a theoretical than a practical problem, the framework for the future of the estates as a whole having been already largely determined. Although the examples of major developed sites given in the advice suggest that in practice MDS are likely to be mainly sites in single ownership, this is not mentioned as a requirement.

10.4.220. Other matters concerned the details of the boundaries to be shown on the Proposals Map. The National Trust considered that the boundary came too close to the River Wey Navigation. They pointed to the overall aim to reduce the impact of development on the Green Belt and considered that infilling in an area such as the estates should be subsidiary to this aim. In general, this view can be supported, although the proposed Policy, in so far as infilling is concerned, is faithful to the advice in seeking no greater impact on the Green Belt. As to the boundary, they suggested setting it in from the Navigation to exclude an area that is undeveloped towards the northern end of the estates and part of the developed area to the south. The land is subject to Policy 99G11, and has on it the site of a historic mill leat which the National Trust would wish to see restored. CPRE Surrey made a similar request.

10.4.221. Further suggestions for changes to the boundary were for inclusion of the lock keepers cottage (occupied by security staff for the estates as well as for the Navigation), a small areas of open land on the southern boundary and woodland extending northwards along the Navigation. I agreed with the Council that these three areas were either not part of the estates in structural terms, or offered no opportunity for infilling within the terms of the

proposed Policy. I also agreed with the Council that the request of the National Trust should be accepted, in so far as the land adjoining the Navigation to the north of the lock keepers cottage was concerned. This land appeared to be being used in part in connection with an adjacent concrete plant, but it remained in appearance as a wooded area adjoining the Navigation and could not be infilled within the Policy. The area suggested to the south of the lock keepers cottage, while largely open storage or parking also included parts of buildings. There would be scant opportunity for infilling on this part of the site, but, because it is an operational part of the estate I do not consider that it should be removed from the defined area. Land on the southern boundary of the MDS raised similar questions. In part this was open storage/parking space and in part a turning head in a grassy setting. The first was clearly an operational part of the estate, the second less so. Neither would offer opportunities for infilling. I had sympathy for Mr Jackman's view as to the boundary at this point, but felt that the Council's Appendix 6 was a reasonable compromise here and to the north.

CHAPTER 10. RECOMMENDATION 10.

- 10.4.17. That the boundary proposed by PC103 be revised by the removal of land parallel to the river Wey Navigation to the north of the lock keepers cottage and land on the southern boundary, both as shown on the Council's plan Appendix 6.

3. Other proposed MDS
(a) Merrist Wood College

Objector

Objection 1284

Merrist Wood College

10.4.222. The College was established immediately after the Second World War as an agricultural college, although in recent years the courses it offers have expanded to include open air recreation and sporting and environment studies. The College is located in open countryside to the west of Worplesdon, the College buildings set in an extensive area of woods and farmland. Originally centred on a large country house, the teaching and residential blocks, and the extensive range of agricultural, horticultural and recreational training buildings fall into three groups, a group which can be seen as the heart of the College containing the main administration and the residential blocks to the north and east of the original house, a considerable area of mixed buildings in a teaching area to the east, but separated from the first area, and a practical teaching area at Merrist Wood Farm on lower ground some 500m to the south.

10.4.223. It was argued that the College, being a dynamic educational establishment in process of adapting to the changing needs of higher education, had a constant need to adapt and replace buildings and to build for new activities. The substantial covered area of the recently completed equestrian training centre at Merrist Wood Farm was quoted as an

example. In the past the College had been able to rely on the concession for institutions standing in extensive grounds in the Green Belt to feel secure that its evolution would not be unreasonably obstructed. To provide the same sort of certainty MDS status was sought, in the belief that the College qualified under the terms of PPG2.

10.4.224. There was no doubt that added together the footprint of the three parts of the College buildings was on a par with other sites identified as MDS for the Plan. The Council's concerns were that the College had what could be regarded as three developed cores, which had the advantage of reducing the impact of the buildings on the Green Belt, but at the same time reduced the opportunities for infilling, or for significant improvements to the openness of the Green Belt through redevelopment. I accepted that only in the second and third of the areas would there be much scope for infilling within the terms of the Policy - in the first area the buildings are quite widely spaced and in attractive landscaping.

10.4.225. This would not necessarily argue against recognition as a MDS. It would, however, pose problems for the definition of a boundary for the area in which infilling might take place, unless that boundary is itself seen to be qualified by the definition of infilling given in PPG2. If confined to "The filling of small gaps between built development" and meeting the criteria of paragraph C3, the dangers seen by the Council particularly in the first of the areas would appear to be overcome.

10.4.226. Annex C of PPG2 includes a section specifically devoted to higher and further education facilities in the Green Belt, noting the loss of their previous exemption. While according them no special status, there was recognition of their needs for development to meet the Government's policies in these spheres. The advice left it to local plans to take account of the need of these establishments, having regard to opportunities for infilling or redevelopment, the implication being that, where appropriate, they should be identified as MDS.

10.4.227. I consider that the scale of the development and the opportunities there are for development within the bounds of the advice to meet the continuing needs of the College, it would be appropriate to include the College as a MDS. The boundaries identified for the purposes of infilling, qualified as noted earlier by the criteria of the Policy, were the subject of discussion. The Objectors suggestions were to my mind too all-embracing. I preferred the three areas I have referred to above rather than two (as identified in the Council's Committee Report), but I accept that the Council might prefer to give this further consideration in the light of the evidence to the Inquiry.

CHAPTER 10. RECOMMENDATION 11.

- 10.4.18. That Merrist Wood College be included in the Plan as a MDS under Policy 99RE15 and boundaries be drawn accordingly for inclusion on the Proposals Map.

(b) National Rifle Association, Bisley

Objector

Objection 2035

National Rifle Association

10.4.228. Bisley Camp occupies a very substantial site to the north of Pirbright, much of it the rifle and other small arms ranges. The camp itself is an attractive area of low buildings interspersed with open spaces, a number of these used to accommodate caravans, semi-permanently sited to provide for the needs of competitors at events staged at the site. The National and International repute of the site has led to a continuing programme of improvement and expansion of the facilities provided. The development footprint by the Council's figures is the largest of any of the sites considered for MDS status. The problems to its identification were the dispersed nature of its development, the buildings mostly single storey and none more than two, giving a particularly attractive character, parts of the site being a Conservation Area, but making the identification of a core of development and opportunities for infilling or redevelopment which would meet the criteria difficult.

10.4.229. I accept that whether the advice requires there to be a core of development and, if so, what that core should constitute, is open to debate. I, nevertheless, went along with the Council's view that a core of development was a prerequisite and that, in this instance, drawing particularly on paragraph C6, that the sort of development by which the Camp was characterised was not that in which infilling could in general terms be accepted without harm to the character of the Green Belt. Much the same could be said of the prospects of redevelopment on any scale.

10.4.230. In this instance, therefore, I do not consider that Bisley Camp is to be seen as a MDS. In recognition of the importance of the Camp as a recreational resource, however, it is likely that much of the development that the National Rifle Association might wish to undertake in its programme of improvements and modernisation could, if the conditions of the concession are observed, be seen as appropriate development in the Green Belt, fitting the definition as essential facilities for sport and outdoor recreation. The Council I noted had prepared a plan which indicated the limited areas where there might be a possibility of infilling without damage to the Green Belt, or conservation interests. This could serve to assist in locating appropriate development, although it did not to my mind add convincingly to the argument in favour of MDS status. Proposals arising from it would need to be considered on their merits.

CHAPTER 10. RECOMMENDATION 12.

10.4.19. That NO CHANGE be made to the Plan in respect of this Objection.

(c) Braboeuf Manor

Objector

Objections 1704, C40 The College of Law

10.4.231. The Manor occupies a substantial parkland site on rising land on the southern edge of Guildford. Its principal buildings are a former country house with some more modern buildings added forming the headquarters, administration and teaching facilities of the College of Law. A sizeable area forms a car park. A further building, Barratt House, in the defined urban area to the north of Sandy Lane is also occupied by the College. While the figures were disputed, the site and the footprint of the buildings are substantially smaller than those of MDS selected by the Council.

10.4.232. The Council accepted that there was an identifiable core of development and that acceptable infill would be possible between the existing buildings. They did not, however, consider that the site met the first criterion, a substantial footprint of development containing a range of buildings which cumulatively have a significant impact on the openness of the Green Belt. The latter part of this is largely fortuitous, the College being located in a re-entrant valley from the main valley of the River Wey in well wooded surroundings, but I could accept that the developed core was not substantial and that significant infilling could very much change its character.

10.4.233. I considered the parts of the advice that related to higher and further education establishments, as mentioned above, and accepted that the local plan is the place to give recognition to their needs. However, this is to be through identification as MDS and I supported the Council's view that in this instance that is not appropriate.

CHAPTER 10. RECOMMENDATION 13.

10.4.20. That NO CHANGE be made to the Plan in respect of this Objection.

(d) Thames Water Sites

Objector

Objections 1430, C238 Thames Water

10.4 234. Thames Water suggested five sites for inclusion as MDS, all water (WTW) or sewage treatment works (STW):-

Shalford WTW
Hockford STW
Wisley STW
Ripley STW
Unstead STW.

10.4.235. The Objectors drew attention to the recommendation of the Inspector dealing with Objections to Runnymede Local Plan that the Lyne STW be designated a MDS and a similar recommendation concerning Swinford WTW in the Vale of White Horse Local Plan.

10.4.236. Water and sewage treatment works are among the examples of MDS given in paragraph C1 of PPG2. Nevertheless, it is reasonable to apply to them the same criteria for identification as to other developments. This is somewhat complicated by much of the building in such works being at or only a little above ground level with few buildings of significantly greater height. Their impression is often substantially open and their impact on the Green Belt, in consequence, small. Only the larger sites, among which could be seen to be the Lyne works, would on this basis properly qualify as MDS.

10.4.237. None of the works in the Plan area appeared to be of this scale, and if they are to be compared with sites selected as MDS, the buildings cover a very small part of the site. Even if the tanks, filter beds, etc., may bring them to a comparable level in terms of the area covered by development, that the sites are not prominent in the landscape I see as significant. I appreciate that there is a need for the utilities to be able to expand or update their fixed installations and that the water and sewage treatment industries are under particular pressure for change. MDS status might help in this direction, but I did not see this Policy as providing the degree of freedom anticipated, impact on the Green Belt remaining the key factor.

10.4.238. I do not consider that the five sites, which if they differed one from another had much in common in terms of their scale and nature, as qualifying by the criteria set down for recognition as MDS. As has probably been the case up to now, further change or development necessary for their continuing function will need, and in most instances could probably show convincingly, very special circumstances as an exception to Green Belt policy.

CHAPTER 10. RECOMMENDATION 14.

10.4.21. That NO CHANGE be made in respect of these Objections.

- (e) Land and buildings at Tannery Lane, Send (Crack Processing Mills or Commercial Works)

Objector

Objection 562

Wey Estates

10.4.239. The Objections related to industrial premises occupying a narrow site between Tannery Lane and the River Wey Navigation to the north of Send. The site and the building footprint were among the smaller of those considered by the Council. The nature of the site and the buildings suggested little scope for infilling or redevelopment that would meet the intention of the Policy.

10.4.240. As mentioned earlier, I was given to understand while the Inquiry was in progress that there were discussions continuing as to the future of the site. I accepted the Council's view that the site was too small and too limited in its scope to properly qualify as a MDS.

CHAPTER 10. RECOMMENDATION 15.

10.4.22. That NO CHANGE be made to the Plan in respect of this Objection.

5. COUNTRYSIDE BEYOND THE GREEN BELT

POLICY 99RE4 COUNTRYSIDE BEYOND THE GREEN BELT

10.5.1. The Green Belt takes up the greater part of the countryside of the Plan area, but a relatively small area to the south and east of Ash/Tongham and in the Blackwater Valley is outside the Green Belt, but by Structure Plan Policy PE3 is accorded protection "for its own sake". Policy PE3 permits development only for uses related to the essential needs of agriculture, forestry, outdoor sport and recreation, mineral extraction, waste disposal and gypsy caravan sites. Some development may be permitted under other policies for the diversification of the rural economy and, in addition, local plans may identify land to meet necessary development requirements which cannot be met within existing urban areas.

10.5.2. The intentions of the Structure Plan are translated into the Plan by Policy 99RE4, which applies to an area that is largely a residual one, in so far as it is defined by the boundaries of the Green Belt and of the urban areas. The definition of the urban areas was essentially de facto, whether land was properly seen as part of the countryside or of the town. Some peripheral areas of low density development were excluded from the urban area and thus included in the countryside. This was the source of a number of site specific Objections. The Council applied somewhat similar thinking to the definition of settlements as in the Green Belt, concluding that there were none in which further development might take place sustainably and without damage to the objective of protecting the countryside. This was a concern to residents of Ash Green, the only significant settlement in the designated area.

(a) Objections to the form or wording of the Policy

Objectors

<i>Objection 330</i>	<i>GOSE (CW)</i>
<i>Objection 487</i>	<i>MAFF (CW)</i>
<i>Objection 651</i>	<i>Tongham Parish Council</i>
<i>Objection 713</i>	<i>Rushmoor Borough Council (CW)</i>
<i>Objection 1250</i>	<i>Ash Parish Council</i>
<i>Objection 1618</i>	<i>Councillor Mrs J Cassar</i>
<i>Objection 1660</i>	<i>Country Landowners Association</i>
<i>Objection 1745</i>	<i>Mr T A Sadler (CW)</i>

Objections, Issues and Consideration

10.5.3. The Objections related to the Policy itself, which listed various classes of development and the criteria to be followed if it was to be acceptable, and to Paragraph 10.19, which enlarged on the purposes of the Policy. The two Government agencies commented that the Policy was too restrictive. GOSE thought more classes of development should be permitted and made mention of the rural exceptions policy for rural affordable housing. MAFF considered that more than "essential" development for the needs of agriculture should be permitted.

10.5.4. The Policy was reflecting the terms of Structure Plan Policy PE3 in what was to be permitted, but the Council accepted (in their written representations) that the classes of development in the first part of the Policy should be expanded to take in rural affordable housing (Policy 99H12) and the reuse and adaptation of rural buildings (Policies 99RE9 and 99RE10)(PC108). The Proposed Change also included an alteration to Paragraph 10.22, but if the additions were to be to the classes of the first part of the Policy, as would seem more appropriate than to the criteria, this change would not be required. To meet the MAFF point, it was agreed that in the first criterion of the second part of the Policy "controlled" could be substituted for "limited" and "reasonably needed" for "essential" (PC108). I saw these to be reasonable changes.

10.5.5. The open land of the Blackwater Valley is part of the Blackwater Valley Strategic Open Gap, land for which there are environmental and recreational proposals as well as structural. These are set out in Policy 99R11, where a more restrictive attitude is taken to some forms of development, for example, the expansion of existing employment uses. The Council agreed that there should be a cross reference added to the end of Paragraph 10.19 (PC109).

10.5.6. Objectors were concerned that the reasoned justification of the Policy carried an implication that, although no land was designated for development in the Plan, the designation was simply reserving land for future development. The wording of Structure Plan Policy PE3 could be seen to lead in that direction and the Council did not disagree, in so far as if further open land were required at some future date, this land could be seen to have less strong protection than the Green Belt.

10.5.7. A number of Objectors suggested that the Green Belt be drawn to include this land. The general indication of the extent of the Green Belt given by the Structure Plan would not, however, permit this. National policy for the protection of the countryside against unnecessary development is, nevertheless, strongly stated and should be seen to be enduring. The current emphasis on looking to brownfield land before greenfield and following a sequential test in seeking future housing land can be seen to be reinforcing countryside protection.

10.5.8. In the same vein, seeking grater protection for the longer run, there were suggestions that the AONB or AGLV notations should be extended over the area. These designations are based on considerations of landscape quality, unlike the Green Belt, where, essentially, openness is enough. That this area was not included in these designations may

have had some thought to long term development needs, but that this was not among the land included did not to my mind show any marked inconsistency, for example, with Green Belt land to the east, also excluded from the landscape designations.

10.5.9. The Country Landowners Association asked that this Policy, as others, should reflect the changing nature of agriculture. In planning terms the definition is normally derived from the planning legislation, currently from the Town and Country Planning Act 1990 (Section 336(1)), repeated in paragraph 3.1 of PPG7. The Plan contains no other definition and in so far as this definition is likely to be updated, should there be need, the Plan need do no more. Looked at more broadly, the Plan does incorporate Policies in line with current advice on such matters as agricultural development, the reuse of rural buildings and the diversification of the rural economy and in my view can be seen to be keeping step with the changing needs of the countryside.

CHAPTER 10. RECOMMENDATION 16.

10.5.1. That PC108 be made.

(except that in Paragraph 10.22 the change proposed be NOT made):

10.5.2. That PC109 be made.

(b) Objections relating to the identification of settlements (Ash Green)

Objectors

Objections 271-9

Mr J Sawyer and Mr P H Munday

Objection 510

Mr and Mrs R Simmons

Objections 709,710

Mr Dobbie

Background, Objections and Issues

10.5.10. Structure Plan Policy PE3 recognises that the definition of Countryside Beyond the Green Belt will exclude rural settlements. Structure Plan Policy RU1 sets out the policy for rural settlements, indicating four requirements to be met for development to be permitted. Local plans are expected to identify rural settlements and give guidance as to the way boundaries will be defined. In the Structure Plan, the requirements for the identification of settlements, the definition of their boundaries and the development to be permitted are the same for both Green Belt and other rural settlements, although the policy for the former has now been overtaken by the revision of PPG2.

10.5.11. The Objections related to Ash Green, the only settlement of any size in the designated area of Countryside Beyond the Green Belt. In the Plan this settlement is "washed over" and there is no Policy which would permit development in the settlement, as in the case of designated Green Belt villages, other than the Policy itself. Objectors considered that there was no significant difference in size or character between Ash Green and many of the

designated Green Belt villages and no reason not to permit the same modest developments in the settlement.

10.5.12. Ash Green gives the appearance of a relatively modern settlement, developed predominantly with detached dwellings on the frontages of plots relatively narrow in relation to their depth. Much of the most recent building has been in more compact estates filling in the centre of the original settlement. There are roughly 180 dwellings estimated to accommodate some 450 people.

10.5.13. The principal issue to emerge was whether Ash Green should be identified as a settlement and Policies included in the Plan that would allow development to take place within defined boundaries.

Consideration

10.5.14. It was argued by Objectors that the settlement is distinct from and has firm edges to the surrounding countryside. Recent development has given it a compact form comparable with many of the identified Green Belt villages, or villages in other parts of the County in the Countryside Beyond the Green Belt. It would be expected that rather than imposing a stricter control of development within the settlement than in Green Belt villages, the Plan would recognise that there were opportunities for modest development to take place without harm to the countryside.

10.5.15. My predecessor considering objections to what is now the adopted plan heard broadly similar arguments. He concluded that the settlement was compact and, mostly, recently built. It met the criteria of the 1989 Structure Plan (which were broadly similar to those applied by the Plan to Green Belt villages); it was not a low density or loose knit residential area, but a well formed concentration of dwellings rather than an isolated group of houses. He recommended that Ash Green be identified as a settlement within the Policy area.

10.5.16. The Council did not accept the recommendation and have opposed the current Objections on similar grounds. Essentially, identified settlements should contain supporting services for their populations, such as shops and community facilities. Ash Green has no shops, services or community facilities.

10.5.17. I believe my colleague's conclusion related to the form and character of the settlement was the right one. My visit convinced me that his assessment was correct. At the same time, he made no recommendation for further land in the settlement to be allocated for housing and I have assumed that he did not have anything more than the most modest further development in mind in making his recommendation.

10.5.18. I have looked at the policy for the Green Belt villages as being guided by policy considerations, whether there are opportunities for development to take place that is sustainable and in keeping with the settlement, rather than an identification of communities. In Ash Green, having regard to the second of these considerations, there would be some opportunities for further infilling, but I accepted the Council's view that the settlement

boundaries would need to be defined to exclude the large rear gardens and other accommodation land at the rear of the peripheral houses. While there is screening for much of this land, these woods, paddocks and hedges are of the countryside more than of the settlement, while the opportunities for larger scale development that could be opened would clash with the first consideration, now an underlying objective of the Plan.

10.5.19. Objectors put that the sustainability credentials of the settlement should not be judged by the facilities available in the settlement itself, because the facilities of nearby Ash and Tongham were readily available. My experience in the area suggested that these were at such a distance that with relatively poor public transport they would be likely to be accessed by car. While the scale and facilities of the identified Green Belt villages varies, sustainability is an important factor in their identification. I accept that the settlement fails this test and that identifying it in the Plan in a way that would permit even modest further development would be inappropriate.

(c) Site specific Objections

10.5.20. There were a number of Objections relating to land on the periphery of Ash, Tongham and at Ash Green, all seeking boundary changes to the Ash/Tongham urban area and/or allocation to permit housing development. I have, therefore, assumed that if land were included in the urban area it would be likely to be developed, at the densities now recommended by the advice. In this respect I have concluded that there is no need to allocate more land for housing in the Plan period. I am also of the view that Ash Green should not have a settlement boundary defined and that any development taking place there should only be that permitted by this Policy, or by other Policies of this and the Housing Chapters. The principal outstanding issue in these cases was whether, having regard to the situation and circumstances of the individual sites, there was reason to consider they should be in the urban area rather than have a Countryside Beyond the Green Belt designation.

(1) Land at Warren Farm, Ash Green

Objectors

Objections 271-9

Mr J Sawyer and Mr P H Munday

10.5.21. These Objections related to land at Warren Farm on the southern edge of Ash Green. The Objections proposed drawing a settlement boundary for Ash Green, considered above, and the allocation of the land for housing development, considered in relation to Policy 99H2 in Chapter 5.

(2) Grange Road/Foreman Road, Ash

Objection 47

Ash Green Residents Association

10.5.22. The Objection referred to two parcels of land, in the first instance suggesting an addition to the Countryside Beyond the Green Belt of land to the north of The Croft and properties further north in Foreman Road. This land was considered to be at a considerably

lower density of development than the residential areas adjoining and more appropriately seen as part of the countryside than the urban area.

10.5.23. In the Council's view, the appeal decision to allow the building of a house on land to the north of The Croft, although the development has not yet taken place, had changed the situation in relation to this land and it was now appropriate to see it as part of the urban area. I accepted the Residents Association's point that this area is different from development close by, more rural and diverse in its character, but I shared the Council's view that once the land to the north of The Croft is developed, the character will change and the proposal of the Plan is an appropriate one.

10.5.24. The second parcel of land was to the east of Foreman Park, a triangular field between Foreman Park and Foreman Road. It was suggested that this be included in the urban area and development permitted to complete the Foreman Park Estate. I consider this land further in relation to (4) below.

(3) The Croft, Foreman Road, Ash

<i>Objection 166</i>	<i>Tunsgate Ltd</i>
<i>Objection 631</i>	<i>Mr and Mrs Radford</i>
<i>Objection 1343</i>	<i>Mitchell and Partners</i>
<i>Objection 1500</i>	<i>Beazer Strategic Land</i>

10.5.25. The Croft is a substantial house standing in large grounds at the southern end of development in Foreman Road. As mentioned in relation to the previous Objection, the Plan draws the boundary of the urban area to include land north of the drive to the house and it is at this point that in future the built up area will be seen to begin when travelling northwards along Foreman Road. The urban area proposed also takes in development in The Briars to the west and Parish Close, a site allocated in the adopted plan. Excluded are the house itself and the north western part of the grounds, which in consequence forms a salient of open land projecting into the defined urban area. The suggestion was that the house and this land be included in the urban area.

10.5.26. It was clear that there had been considerable development in this area since the current plan was adopted which has made the surroundings of The Croft much more urban and the links of the land in question to the countryside more tenuous. Were there a need to identify more land for housing, this site could well suggest itself. However, links to the countryside proper remain to the south and the site is a sizeable one, not over dominated by its urban neighbours. My view on visiting the site was that it was more appropriately included in the rural area than the urban and that the boundary was not drawn unreasonably in relation to this land.

(4) Land at Foreman Road, Ash

<i>Objection 637</i>	<i>Mr F J Alexander</i>
<i>Objection 705</i>	<i>H C Webb Estates Ltd</i>

10.5.27. The land in these Objections is a field of roughly triangular shape bounded to the north west by a modern housing estate, Foreman Park, and to the east by Foreman Road. To the south is a substantial detached house, Foreman Manor, further open land extending southwards to Grange Road. The development to the south of Grange Road with that to the north west of the land makes it something of a salient of open land extending from the countryside into the eastern part of the urban area. The land is the same as that referred to by the Residents Association in (2) above.

10.5.28. The land is neglected, although at the time of my visit it was being used for grazing. The boundary with Foreman Park is lined with garage blocks and this gives this development an unfinished look and makes a weak boundary. The boundary with Foreman Road is marked for most of its length by an unkempt hedge. The site has had a complicated planning history, in so far as the boundary with Foremen Park appears to have been set to accommodate a proposal to build a bypass for Ash, a scheme now long abandoned. My predecessor in 1992 saw this land as a possible substitute for other proposed housing land, although the recommendation was not accepted by the Council and appeals since against refusals of permission for development have been dismissed.

10.5.29. I could see that if there were a need to identify more land for housing in the Ash/Tongham urban area this would be a site that would suggest itself for consideration, although I accept that it would need to be considered against the merits of other possible sites. As things stand, I do not consider that there is a need to allocate more land for housing in the Plan period. This land, with the land to the south, at present reads as more of the countryside than the town, being open and contiguous with the undeniable countryside to the east. If the boundary to Foreman Park is weak, it is, nevertheless, defined and defensible. The relationship that the site has with the countryside was recognised by my predecessors and in the absence of "need" I consider that the designation of the Plan is correct.

(5) Land at Ash Green Lane, Tongham

Objections 642/3, 645, 647 Laing Homes
Objection C43 Ash Green Residents Association

10.5.30. Several Objections were made by Laing Homes with this land as their main concern, but at the Inquiry these were reduced to two main matters, the definition of the urban area and the allocation of an area within the redefined boundary for housing development.

10.5.31. The land in question is located on the eastern edge of Tongham, overall comprising the playing fields of Ash Manor School, two fields to the south with land forming site (7) below immediately to the west, and to the south of them an allotment site. Ash Green Lane West, for most of its length no more than a footpath, separates the playing fields from the two fields to the south, while the triangular shaped allotment site had Spoil Lane as its boundary, a strip of land between Spoil Lane and a former railway and the railway itself also being included in the overall site.

10.5.32. The boundary between the urban area and the "Countryside Beyond the Green Belt" designated area was drawn closely along the edge of the built up area, the urban area including the school buildings. The Objectors considered it should take in all of the land described above. The two fields, and the land between them and the present built up area, would be allocated for housing development, capable of providing up to about 100 dwellings at 30 dwellings per hectare, the recommended minimum density of PPG3.

10.5.33. In so far as the allocation of land for housing was concerned, I could accept that the situation of this land between the playing fields and the allotment site could be seen to place it between quasi-urban uses and that it would be possible to reestablish a firm urban edge on its eastern boundary. The "sustainability" credentials of the site would be quite good, but in both respects the site would need to be considered with other suitable land, if a further allocation of housing land were sought. In this instance, although the built up area extends further east than this land, notably in The Cardinals, the extension of development into the open land separating Tongham from Ash Green would also be a consideration.

10.5.34. However, I am of the view that there is no requirement to allocate further housing land for the Plan period. There is, therefore, no need to consider the merits of this land, or to rank it in relation to other possible sites. A future need might have to be seen in different circumstances of local or strategic requirements. What was evident from my visits was that this land in its totality is a part of the open area to the east of Tongham, and in its character and appearance essentially a part of the countryside. I could see no sufficient reason in this instance to consider the school playing fields or the allotment site as warranting different designation, for example, as open space within the urban boundary, while the fields were clearly related in land use as well as visually to the farmland to the east.

10.5.35. In my view, the land suggested should not be allocated under Policy H2, nor is the Plan reflecting the urban boundary incorrectly, or without regard for the future needs for housing in the Plan area.

10.5.36. The Counter Objection by the Ash Green Residents Association was to the proposed removal by PC130 of land in the Objection site from the Ash Green Meadows SNCI. The Surrey Wildlife Trust indicated that this land had been included in error, having a relatively low nature conservation value. The Residents Association drew attention to the value of this area for wildlife on the adjoining SNCI, as well as some specific features of interest on the land.

10.5.37. I noted the Council's view that, if there were nature conservation interests that did not merit the inclusion of the land in a SNCI, should development take place, they could, if of sufficient importance, be protected by Policies of the Natural Environment Chapter, notably the proposed new Policy NE6. I considered that there were insufficient grounds to contradict the Surrey Wildlife Trust's advice and recommend against the proposed change.

(6) Land at Green Lane West, Ash Green

Objection 709

Mr Dobbie

10.5.38. The land referred to in the Objection is on the northern side of Ash Green Lane West between the rear boundaries of properties in White Lane, part of Ash Green, and Bin Wood. Currently pasture land, the two fields of the site have a total area of about 4.64ha. It was sought to have Ash Green defined as a settlement, considered above, and argued that there was a need to allocate more housing land, also considered earlier. It was also argued that, even if there was no current need, the land should be removed from a countryside designation in the Plan.

10.5.39. I have concluded that there is not a need to allocate more land for housing for the Plan period. I have also taken the view that Ash Green should not be given a settlement boundary. However, even if it were, this site would be unlikely to be included in a boundary set essentially by demarcating an existing built up area with no intention to make significant extension. The site may have some merits in sustainability terms, but if there were a need to identify land for housing other sites could present a better case in this respect. Ash Green itself has little to offer in terms of local services and facilities and the site is well removed from those of Ash and Tongham.

10.5.40. The site and its surroundings are essentially rural. The site may well have substantial enclosure in its hedges and the nearby woodland, but much the same argument could be made for many sites in rural areas. In my view, development could only diminish the value of the countryside surrounding Ash Green. At the same time, it could add to the extent of this settlement, much of which is at low densities, weakening the separation from Ash and Tongham at a point close to where the development of South Lane already makes a substantial incursion into this "gap".

10.5.41. In my view the Plan is accurate in its inclusion of Ash Green in the Countryside Beyond the Green Belt designation and there is no sufficient justification for the designation to be removed from the settlement or this land.

(7) Land at the junction of Aldershot Road and the Blackwater Valley Route

Objection 1175

Scottish and Southern Electric

10.5.42. The site concerned in the Objection is on the northern side of Aldershot Road at the junction with the Blackwater Valley Route. The site is what remains of a larger sports field, truncated by the construction of the new road. In the Plan the site carries the designation of Countryside Beyond the Green Belt, but also that of the Blackwater Valley, a policy area concerned with recreation and the protection of the open land of the Blackwater Valley as a separation between the Blackwater Valley towns.

10.5.43. I give further consideration to this and an allied Objection in relation to Policy 99R11 in the Recreation Chapter. I can appreciate that looked at in isolation the site might not appear to be appropriate for what is essentially a countryside designation. However, in terms of the separation of adjacent settlements, the openness of the site has an importance which I consider justifies its inclusion in the area of the Blackwater Valley Policy. I did not consider that the site was "brownfield" in the terms of the advice, while a recreational use would be within the intentions of the Plan. While appreciating that the Objectors may no

longer have a recreational use for the site, the relevant Policies of the Plan would require that this is no longer a practical or viable use to be properly demonstrated. Accordingly, I have not recommended a change to the Plan in respect of this land.

(8) Land east of Manor Road, Ash

Objections 1218/9

Myddelton Developments Ltd

10.5.44. The site was land to the east of Manor Road and to the south of Ash Green Lane West, including No 57 Manor Road and land extending behind neighbouring houses to the south, in all some 0.6ha. The land was mentioned in the Objections on behalf of Laing Homes above and if land to the east of Manor Road were to be developed, this could form a convenient access. In this instance, the Objectors considered that most of the land between the properties on the east side of Manor Road extending to the former railway and South Lane should be included in the urban area and/or the smaller site should be allocated for residential development.

10.5.45. I can accept that being located on the edge of the urban area, the site could provide for sustainable development and in the past has been used for purposes ancillary to the activities of the owner of No 57 Manor Road as a builder. It is now somewhat untidy and overgrown, blending with the open land that extends to the east. Although the Countryside Beyond the Green Belt in this area includes the school playing fields, allotments and this land, which may not be countryside seen in terms of woods and farmland, they are essentially open and present a similar character and appearance. This land may be well screened by the overgrown hedges, but development would be an encroachment into a now open area and I had little doubt would be seen as such. I have earlier concluded that there is no need to allocate more land for housing for the Plan period and to draw the boundary of the urban area to exclude land which could offer unneeded opportunities for development is not illogical.

10.5.46. While in relation to future reviews of the Plan there may be need to again consider the needs for housing land, this should be done in the context of the requirements of the time and taking into account all available options, including the availability of brownfield land and the merits of urban extensions. At this time I do not consider that the urban boundary should be moved to include either the larger or the smaller area, nor that a specific housing allocation should be made.

(9) Manor Farm, Tongham

Objection 1287

H E Poulson and Son

10.5.47. Manor Farm is at the southern end of Tongham, located on the eastern side of The Street. A paddock separates the farm house and buildings from the southernmost house of the ribbon of development extending southwards from Tongham, although there is a further group of 10 cottages to the south of the Farm. While the Farm continues as an agricultural operation, if on a smaller scale than in former years, many of the attractive older

buildings of the farm are now in various commercial uses, including a DIY shop and a brewery.

10.5.48. The Objection suggested that the boundary of the urban area should be drawn to include the paddock (of about 0.8ha), the farm buildings and the cottages to the south. The paddock would allow the accommodation of some community and employment uses for which it was said there was no suitable site in Tongham, and the provision of some housing to meet local needs, incidentally offering further support for local shops and services.

10.5.49. The Farm lies below the Hogs Back and is in the AGLV, although outside the AONB. The character of the immediate area has been changed somewhat by the construction of the link from the A31 to the junction with the Blackwater Valley Route and the siting of an Ambulance Station at the local access to the A31 on the lower slopes of the Hogs Back. However, the Farm and the adjacent group of cottages remain separated from Tongham proper by the paddock and the impression both in The Street and from the higher vantage points to the south is that the Farm and the adjacent cottages are outside the village and that the Countryside Beyond the Green Belt and the AGLV designations are not inappropriate.

10.5.50. I could accept that there are could be merits to the use of the paddock, were there local needs to be met, although the Plan would not necessarily prevent uses such as affordable housing in those circumstances. There is, in my view, no need to allocate further land for housing for the Plan period, nor to draw the urban boundary to allow further significant development. I could not see, therefore, that at this time the urban boundary should be drawn to include the land suggested.

(10) Land at Grange Road, Tongham

Objection 1500

Beazer Strategic Land

10.5.51. The Objection related to a broadly triangular shaped field on the south eastern side of Grange Road, its eastern side backing onto houses in The Street and at its northern edge abutting the southern end of development in Grange Road. Housing extends a little further south on the north western side of the road and at its southern extremity is Grange Farm, the former farm buildings having now been converted into a business park. A footpath between Grange Road and The Street follows the southern boundary of the site.

10.5.52. The Plan includes the site in the Countryside Beyond the Green Belt and the Blackwater Valley Policy Area. It was the Objectors' view that neither designation was appropriate and that the land should be included in the urban area and allocated for housing. I have commented earlier that in my view there is no need to allocate more land for housing for the Plan period, nor to draw the boundary of the urban area in such a way that it would permit further significant housing development. This land has some advantages in its location close to the facilities of the urban area, but it is a greenfield site. I also considered that while it was on the urban edge, that edge is at this point somewhat diffuse - represented by a ribbon of development along the two sides of The Street and separated farms - and the character of the site and its immediate surroundings were very largely rural. As things stand, it appeared

to me that inclusion in the area defined as Countryside Beyond the Green Belt was appropriate.

10.5.53. Policy 99R11 relates to the protection of the strategic gap provided by the Blackwater Valley and the promotion of recreational uses as the prime activity of the open land of the valley. I have made some general points about the Policy in my consideration of the related Objections, including the Objection by Beazer Strategic Land. The Objectors submitted that the site was on the periphery of the defined area at a point where it was not pinched in by the surrounding development. The strategic role of the site was consequently of less importance. It was a moot point whether the eastern boundary of the gap should swing westwards to follow the course of the River Blackwater, with Grange Road as the boundary, as my colleague suggested, or be taken to the foot of the Hogs Back. I noted that the boundary proposed is the same as in the adopted plan. It appeared to me that while this area remains open and there is no necessity to consider whether the urban area should be extended southwards from Tongham towards the Hogs Back to meet housing needs this boundary is reasonably maintained.

(11) Walton, 3 Wandle Close, Ash

Objection 1500

Beazer Strategic Land

10.5.54. In this instance the Objection related to the house and garden at Walton, 3 Wandle Close. The house is at the end of short cul de sac of modern houses with a relatively large garden (about 0.67ha), sharing boundaries with its neighbour in Wandle Close, houses in South Lane to the east, a small group of what appeared to be commercial buildings to the south and on the short south western boundary a field. The garden contained a grove of trees, which are subject to a TPO. The land was at one time affected by proposals for an Ash Bypass and the alignment of that now abandoned road proposal is evident on a map of the area.

10.5.55. The boundary of the urban area is drawn to include the house, but not the greater part of the garden and also excludes the houses on the western side of South Lane, although not the recent development on the eastern side. This is a change from the adopted plan, although a part of this land was an allocated housing site at that time.

10.5.56. The Objectors pointed out that the site and neighbouring land was essentially a part of the built up area of Ash, largely surrounded by other residential development and having equally good sustainability credentials. The site was not a part of the countryside, any more than the adjoining houses, including those in South Lane. It is my view that there is sufficient land allocated in the Plan to meet the housing needs of the Plan period, but I have noted that a part of the provision is to come from windfall sites. I appreciated that the boundary of the urban area was drawn tightly to exclude more spacious properties which might allow too great an addition from this source. I could not see, however, that this land had anything of the countryside about it, or that it was contributing to the separation between Ash and Ash Green.

10.5.57. My predecessor recommended that a change be made to the urban boundary at this point to take in the Objection site and the properties in South Lane to the east. This would take in the properties on the western side of South Lane as far south as the southern boundary of the Objection site. I make a similar recommendation.

CHAPTER 10. RECOMMENDATION 17.

10.5.3. That the boundary of the urban area be changed to take in the whole of 3, Wandle Close, Ash, and houses and gardens on the western side of South Lane as far south as the southern boundary of the Objection site.

(12) Kingston House, Poyle Road, Tongham

Objection 1636

C J C Wing Trust

10.5.58. The Objection related to land on the northern side of Poyle Road, towards the eastern side of Tongham. In all it extended to about 3.2ha, consisting of a rectangular part fronting on to the northern side of Poyle Road between adjacent housing development - once the site of Kingston House - with behind a substantial further rectangular area lapping behind the houses of Poyle Road and to the east adjoining a school playing field and houses in The Cardinals. The other boundaries adjoined fields.

10.5.59. The part of the site adjoining Poyle Road was included in the urban area, as was the development of The Cardinals. The Objection suggested that the remainder of the site also be included. This, it was considered, was supported by the previous residential use of the site, the two boundaries with the defined urban area, the sustainability of development here and the good containment of the site. My predecessor recommended the allocation of the site for housing, having regard to its relationship to the urban area and its well established trees and hedges.

10.5.60. It should be noted that my predecessor also commented that he saw the site as a part of the countryside. His recommendation not being accepted by the Council, an appeal following a subsequent application for development was dismissed. In my view, I do not have the same need as my colleague to identify more housing land for the Plan period. While there may well be merits to the site, I do not see it as appropriate to preempt the consideration of allocations in any future plan by suggesting that this site should be identified now as a prospective housing site. Rather, I share the view that the greater part of this land now has more of the character of the countryside and that the substantial area of the northern part is appropriately included in the Countryside Beyond the Green Belt designation. It may be that the growth of the hedges and trees of the site has made it less likely that development would be prominent, but I consider that development, nevertheless, would be seen to diminish the separation between Tongham and Ash Green more significantly than does the present development along Poyle Road.

6. LANDSCAPE PROTECTION

POLICY 99RE5 AREA OF OUTSTANDING NATURAL BEAUTY (AONB)

Objectors

<i>Objection 462</i>	<i>CPRE (Waverley)(CW)</i>
<i>Objection 488</i>	<i>MAFF</i>
<i>Objection 1558</i>	<i>St Martha Parish Council</i>
<i>Objection 1893</i>	<i>CPRE Surrey</i>

Background, Objections and Issues

10.6.1. AONB are a National designation, that for the Surrey Hills extending to much of the North Downs and the Greensand Ridge. Designated in 1958, Structure Plan Policy PE7 provides a basis for the Policy of the Plan. The relevant policy of the adopted plan, Policy 12RE, took the AONB and Area of Great Landscape Value together. It was of somewhat simpler form than now proposed and it can be appreciated that it might not have been seen to be on all fours with the current Structure Plan Policy.

10.6.2. The Policy proposed for the Plan attracted support and the Objections were essentially to the wording of the Policy, which was felt by some to be too permissive, or in the case of MAFF, not reflecting the advice sufficiently accurately. The Council proposed several small changes to the Policy as a result of the Objections (PC110), which would satisfy some of the Objectors' points. The main issue remaining was whether further changes to the Policy were necessary.

Consideration

10.6.3. The Policy closely follows the wording of Structure Plan Policy PE7. This includes reference to "small scale" development for the "essential requirements" of agriculture, etc., a phrase objected to by MAFF. The Structure Plan includes "small scale", but does not look to a qualification of "need". The Council was prepared to substitute "reasonable needs", a phrase drawn from PPG7, for "essential requirements". It is assumed that farmers are not going to undertake development that is unnecessary in terms of their businesses. This qualification, although it is not a definition of small scale, taken with the precept that development should conserve natural beauty, I considered in practice would be enough.

10.6.4. It was suggested that the forms of development mentioned in the Policy as "normally acceptable" should instead be termed "may be acceptable". The original wording was, however, that of the Structure Plan Policy. There seemed no reason to change the emphasis given by the Structure Plan. It was suggested that "and the beauty of the landscape protected for its own sake" be added, but this would be adding wording, expressing a sentiment basic to the designation of AONB, which has no precedent of which I am aware in the advice.

10.6.5. CPRE made the point that views into and out as well as within the AONB were important. The Council accepted this and proposed to substitute "to and from" for the "over and across" of the deposited Policy. The point arose again in connection with Paragraph 10.25 below.

10.6.6. I saw no objection to the Policy with the proposed changes, other than that the phrase referred to above was not necessary. I noted, however, one point that sprang from the Structure Plan Policy that could be a matter of difficulty in the future. The legislation does not give a statutory duty to give special attention to the preservation or enhancement of natural beauty. The advice, as of PPG7, talks of conservation of the natural beauty of the landscape as the primary objective of designation.

10.6.7. This might be seen as a somewhat obtuse point, and it is complicated by the Structure Plan wording, but I suggest that further consideration be given to the second sentence of the first paragraph of the Policy. A wording such as that below could be more appropriate:-

Development inconsistent with the primary aim of conserving the natural beauty of the landscape will not be permitted.

In the second paragraph, the last phrase of the first sentence would then be repetitive and one drawing attention to the test that would need to be applied in the control of development could be substituted:-

... provided the proposals have no adverse effect on the character and appearance of the area.

10.6.8. Several Objectors referred to phrases in the reasoned justification. "Major" as a qualification of the industrial and commercial development that would not be permitted was questioned (Paragraph 10.24, fifth sentence). PPG7 uses "major" in referring to industrial and commercial developments, the siting of which in AONB would not normally be consistent with the aims of designation. Some minor employment developments would not necessarily be inconsistent with the Plan, in the identified settlements, for example, and it appeared best to keep the wording proposed.

10.6.9. "Important" in relation to the views over and across the AONB mentioned in Paragraph 10.25 was thought to be ignoring the value of other views. I accepted the Council's point that to remove the word could, if the Policy were pressed, halt much otherwise acceptable development and that some yardstick was required. The point mentioned in relation to the Policy itself also arose here. It was the importance of the AONB in the landscape as a whole that was seen by CPRE (Waverley) to be of importance. They suggested adding to the Paragraph "or be to the detriment of views of the AONB from afar".

10.6.10. It would be unrealistic to seek to protect every view, and CPRE conditionally withdrew their Objection on the strength of the changes proposed. In this Paragraph, however, their point would also be met by changing "over and across" to "to and from" to

match the change proposed to the Policy. The two phrases conveying somewhat different interpretations; my view was in favour of the consistency this change would bring.

10.6.11. An addition was suggested to Paragraph 10.26 - "and to raise the standard of care to that of a National Park". It is not within the scope of the Plan to "promote" the AONB to a National Park and while the two designations are made under the same legislation there are differences in intention. The Council drew attention to the recreational objective that goes with National Parks. If the intention of the Objector was the management of the AONB, with which this Paragraph deals, it would be possible to say more of the objectives or proposals for conservation, management, etc., agreed by the Joint Advisory Committee, although my understanding was that these may not be sufficiently advanced for this purpose.

CHAPTER 10. RECOMMENDATION 18.

- 10.6.1. That PC110 be made with the exception that in Policy 99RE5 "ESSENTIAL REQUIREMENTS" be omitted without replacement with "REASONABLE NEEDS".
- 10.6.2. That consideration be given to rewording Policy 99RE5, as mentioned above.
- 10.6.3. That in Paragraph 10.25 "TO AND FROM" be substituted for "OVER AND ACROSS".

POLICY 99RE6 AREA OF GREAT LANDSCAPE VALUE (AGLV)

Objectors

Objection 636
Objection 1894

Mr and Mrs Comley
CPRE Surrey

Background, Objections and Issues

10.6.12. The AGLV is a local designation, to which Structure Plan Policy PE7 applies the same considerations as for the AONB as regards the conservation and enhancement of the existing character. The Plan takes a superficially more permissive approach to development, indicating that it "should be consistent with the intention of protecting the distinctive landscape character of the area". In the Plan area the designated area for the AGLV is, however, wholly within the Green Belt and the greater part in the AONB.

10.6.13. The Objection of Mr and Mrs Comley was considered in relation to Policy 99RE1 above. It was concerned to amend the boundary of the Green Belt and AGLV at Milford. Having regarded the Objection as being mainly to the settlement boundary of the village, which I have not considered should be changed to incorporate the Objector's land, I have not found reason to consider that the AGLV should be removed from this land.

10.6.14. The CPRE Objection was that the Policy should be expressed as a presumption against development unless it meets similar criteria to those set out under Policy 99RE5. The main issue was whether the Policy was worded adequately for its purpose.

Consideration

10.6.15. "Presumption against development" is a difficult phrase in planning policy, normally being an acceptable approach only in the case of the Green Belt. The Objectors' point is better seen as whether the Policy should be worded to stress that development will only be accepted in particular circumstances and must then meet strict criteria.

10.6.16. It has first to be seen that the designated area is countryside, it is Green Belt and over the greater part of its extent also AONB. These other Policies impose controls over the development that can be carried out. However, despite the other designations that cover the same area, there are parts of the AGLV in which this is the main landscape conservation Policy and it has to be considered whether it is doing enough in this respect. In view of the Objection I have considered various alternative ways of presenting the Policy. It is tempting and broadly consistent with the Structure Plan to present this Policy in the same way as Policy 99RE5, using the deposited Policy as a first paragraph and adding the second paragraph from Policy 99RE5. My view was, nevertheless, that the positive presentation made was appropriate and would allow the necessary measure of control in those areas where the AGLV was the main landscape policy.

10.6.17. I considered that no change to the Policy was necessary.

7. FARMING AND THE RURAL ECONOMY

POLICY 99RE7 PROTECTION OF THE BEST AND MOST VERSATILE AGRICULTURAL LAND

Objectors

Objection 1527

Objection C29

Objection C168

Loseley Estate (CW)

Horsley Countryside Preservation Society

CPRE Surrey

Background, Objections and Issues

10.7.1. PPG7, paragraph 2.18, gives current advice on a National policy for the protection of the best agricultural land from avoidable development. Paragraph 10.21 quotes the salient part of this advice. The Objection of the Loseley Estate drew attention to the discrepancy between the Policy and this quotation, which the Council proposed to correct in PC111. The two subsequent Counter Objections saw the Proposed Change as damaging or unnecessary. The main issue was whether the wording proposed was appropriate, having regard to the objective and the advice.

Consideration

10.7.2. The Policy in its deposited form had the advantage of simplicity, the reasoned justification filling in the detail contained in the advice. The advice gives four considerations to be met, where relevant, for development of the best land to be acceptable. In its original form the Policy gave two, there is an overriding need for the development and it is using the lowest grade of land available. The remaining two, that opportunities to site development in already developed areas and the presence of environmental, etc., constraints on the land available of lower grades, are not mentioned. While it could be seen that these are matters covered by other Policies and are not necessary to repeat here, my recommendation is that the Policy is drafted to include all the criteria of the advice. A model is Policy 10.1.1 of "Better Local Plans". The recommendation includes an adaptation of this policy.

10.7.3. To complete the changes, I also suggest that a further sentence is added to Paragraph 10.31 to draw attention to the need to consider first locating development on land within the development boundaries. A suggestion is in the recommendation.

CHAPTER 10. RECOMMENDATION 19.

10.7.1. That PC111 be NOT made.

10.7.2. That Policy 99RE7 be reworded as follows:-

THE BEST AND MOST VERSATILE AGRICULTURAL LAND WILL BE PROTECTED FROM DEVELOPMENT UNLESS THE FOLLOWING CRITERIA ARE MET:-

- (A) THERE IS AN OVERRIDING NEED FOR THE DEVELOPMENT.
- (B) THERE IS A LACK OF APPROPRIATE OPPORTUNITIES FOR THE DEVELOPMENT IN ALREADY DEVELOPED AREAS.
- (C) THERE IS LITTLE LAND IN GRADES BELOW 3A OR LITTLE LOWER GRADE LAND WHICH DOES NOT HAVE AN ENVIRONMENTAL VALUE RECOGNISED BY A STATUTORY DESIGNATION.
- (D) THE DEVELOPMENT IS PROPOSED ON LAND OF THE LOWEST PRACTICAL GRADE.

10.7.3. That a further sentence be added to Paragraph 10.31:-

OPPORTUNITIES FOR ACCOMMODATING DEVELOPMENT NEEDS ON PREVIOUSLY DEVELOPED SITES, ON LAND WITHIN URBAN OR SETTLEMENT BOUNDARIES AND ON POORER QUALITY FARMLAND SHOULD HAVE FIRST BEEN ASSESSED.

POLICY 99RE8 FARM DIVERSIFICATION (INCLUDING FARM SHOPS)

Objectors

<i>Objections 295, C30</i>	<i>Horsley Countryside Preservation Society</i>
<i>Objection 491</i>	<i>MAFF (CW)</i>
<i>Objections 1661-3</i>	<i>Country Landowners Association</i>
<i>Objection 1896</i>	<i>CPRE Surrey</i>

Background, Objections and Issues

10.7.4. The Policy is giving expression to National policy expressed in PPG7, Part 3 and Annex C. The background and its salient features are repeated in the reasoned justification of the Policy. The Objections related to various aspects of the accuracy of the Policy and its supporting Paragraphs in relation to the advice and its implications. The Council proposed some changes in response to the Objections (PC112, PC113, PC114) and the remaining issues were whether further changes were required.

Consideration

10.7.5. The Policy derives from Structure Plan Policy RU4, Farm Diversification, while also taking some elements from Policy RU3, Reuse and Adaptation of Rural Buildings, as well as directly from PPG7. There was Objection to the first criterion that as well as a use being complementary to the agricultural operations of the farm, it should be a consideration that agricultural use could be readily resumed. The point of this Objection is taken, but I felt, with the Council, that this would be too restrictive if farm diversification is to be encouraged. The advice does not support so inflexible an approach.

10.7.6. The third criterion was criticised for its restraint on new building in pursuit of farm diversification. I can accept that there may be circumstances in which some rebuilding, or even new building could further farm diversification. In the Green Belt, PPG2 accepts the reuse of buildings as a part of farm diversification, although subject to strict criteria as to the extent it is "appropriate". Policy 99RE9 reflects this advice in opening the possibility of small extensions being permitted, but in general the Plan is seeking to support Green Belt and landscape protection, to which ends new building for inappropriate uses is discouraged. Such development should be seen as exceptional and I do not consider that this Policy should weaken that stance.

10.7.7. There was Objection to the phrase in the fourth criterion of the Policy, concerning farm shops specifically, that harm to the viability of village shops was not a necessary test. PPG6 and PPG7 both comment on the need to protect village shops and that the impact of farm shops, among other retailing ventures, on village shops, which the advice values highly, should be taken into account, along with any benefits they might bring. I considered that this was a necessary consideration. The Council proposed to substitute "result in a significant adverse effect on", drawn from PPG7, which I saw as a suitable compromise.

10.7.8. There was a suggestion that the Policy should contain the criteria mentioned in Paragraph 10.34. These included traffic and environmental impact and sought landscaping and the improvement of the appearance of groups of buildings. It appeared to me that in most instances where development took place under this Policy it would also involve the following, or other, Policies, which embody these requirements. I accepted that it was not necessary to repeat them here.

10.7.9. Paragraph 10.32 referred to Farm Plans. These are referred to in PPG7 and in the Structure Plan, but in the Paragraph they are given a requirement as backing to diversification proposals. I see every reason to encourage a comprehensive approach to farm diversification, but accept that Farm Plans are voluntary and that they should not be given the impression of being obligatory. The Council proposed adding "where appropriate", which would meet the point.

10.7.10. The separation of buildings in diversified uses from the main farm holding is referred to in Paragraph 10.35. This was considered by Objectors to be an unnecessary restriction which should be removed. This restraint, which would be imposed by condition or agreement, does not figure in the Policy itself. In the Paragraph it is linked to the diversification proposals operating satisfactorily in relation to the general agricultural use of the holding. The Council further justified it on the grounds of protecting the character of the countryside.

10.7.11. The activities introduced as a part of farm diversification are usually seen as predominantly part of the business of the farm and the advice of PPG7 does include the possibility of seeking a planning obligation under Section 106 to tie the building to the land and to discourage eventual sale and fragmentation of the holding. In these circumstances it is not inappropriate to consider such a restriction, although its imposition would necessarily depend on the circumstances. The Proposed Change is not necessarily looking for such conditions or agreements in every case.

CHAPTER 10. RECOMMENDATION 20.

10.7.4. That PC112 be made.

10.7.5. That PC113 be made.

10.7.6. That PC114 be made.

POLICY 99RE9 REUSE AND ADAPTATION OF RURAL BUILDINGS TO EMPLOYMENT, COMMUNITY OR RECREATIONAL USE

Objectors

Objection 332

Objections 493/4

Objections 1664-6

GOSE

MAFF(CW)

Country Landowners Association

Background, Objections and Issues

10.7.12. This Policy, too, has among its objectives the support and diversification of the rural economy, as well as environmental considerations. There is National advice given in both PPG2 and PPG7. This extensive advice is followed quite closely by this and the other Policies of this Section of the Plan. The Objections were in general to particular words or phrases in the Policy, or the reasoned justification, which were thought not to reflect the advice by being too inflexible. The Council proposed several changes to the wording (PC115, PC116, PC117), not all of which were accepted without comment by Objectors, and the main issues remained the balance in various of the terms of the Policy and its supporting Paragraphs.

Consideration

10.7.13. An initial Change proposed was to the purposes for which rural buildings might be reused or adapted. The Policy referred to "employment, community or recreational use". To conform better with the advice, "community or business use" was proposed to be substituted. This is a narrower band of uses than originally permitted and those defined in the Plan as "employment" (Paragraph 6.15), but the qualification that these are uses which can be carried on without undue disturbance to local amenity is an appropriate requirement for the rural areas. Outdoor recreation is an acceptable use in the rural areas and does not require a specific mention in the Policy.

10.7.14. Comments about the criteria, among other things, sought an addition to Criterion 2 to ensure that the nature of the proposed use was taken into account as well as physical changes to the building in protecting the character of the countryside. I could appreciate the Objector's concern that, while covering aspects of change to the building, the Policy made no reference to the use. However, the definition of the business uses to be permitted as those within Class B in part meets that point, while the last four Criteria cover most aspects of a use that would be likely to be harmful to the character of the countryside. I saw no need to make an addition.

10.7.15. Several Objectors were concerned that Criteria 4, 6 and 7 were too restrictive. These concerned activities outside the building related to a use - parking, storage, fencing and other related structures and activities. It was inevitable that there would be a need for some outdoor activities if the building use was to be practicable, which the Council accepted. In their written response the Council suggested that the control of these aspects of an activity could be secured more simply by means of a single Criterion:-

"Any associated buildings, structures or activities (including parking and open storage) would not harm the visual amenity of the countryside".

The reference in Paragraph 10.41 to no activity or storage taking place outside the building would be omitted (PC116).

10.7.16. I noted that some Objectors maintained a concern that these peripheral activities could be a serious problem, but agreed with the Council that the simplest approach is often the most effective and that if there were features of particular proposals that required specific measures, light pollution from security lighting for outdoor storage was an example, these could be the subject of negotiations, or, if necessary, the imposition of conditions.

10.7.17. Paragraph 10.39 made mention of conversions to residential from employment use. The emphasis of the advice, and that of the Plan, is that the support of the rural economy has priority over increases in rural housing (other than affordable housing). The reuse of rural buildings for residential use is the subject of the following Policy, where it is dealt with in detail. A reference here is not out of place and, although there were requests for changes to the wording to reflect that residential conversion could be a saving option where business or community use was not a viable proposition, I accepted the Council's view that that was implicit in the Paragraph and fully dealt with in the next Policy.

CHAPTER 10. RECOMMENDATION 21.

10.7.7. That PC117 be made, in so far as it applies to Policy 99RE9.

10.7.8. That PC115 be made. In Policy 99RE9 Criteria 4, 6 and 7 be deleted and the following Criterion substituted:-

ANY ASSOCIATED BUILDINGS, STRUCTURES OR ACTIVITIES (INCLUDING PARKING AND OPEN STORAGE) WOULD NOT HARM THE VISUAL AMENITY OF THE COUNTRYSIDE.

10.7.9. That PC116 be made.

POLICY RE10 REUSE OF RURAL BUILDINGS FOR RESIDENTIAL USE

Objectors

<i>Objection 338</i>	<i>GOSE (CW)</i>
<i>Objection 396</i>	<i>British Telecommunications Plc</i>
<i>Objection 521</i>	<i>Guildford Diocesan Board of Finance</i>
<i>Objection 1025</i>	<i>Robert Shaw and Partners</i>
<i>Objection 1528</i>	<i>Loseley Estate (CW)</i>
<i>Objection 1667/8</i>	<i>Country Landowners Association</i>
<i>Objection CI-74</i>	<i>CPRE Surrey</i>

Background, Objections and Issues

10.7.18. Reflecting current advice, the Policy discourages the conversion of rural buildings for residential use when it would be practicable to put them to a business or community use. The Objections concerned, principally, criticisms that the Policy was taking too negative a stance on residential reuse and suggestions for changes to make the wording

more accommodating. An exception was the Objection of GOSE, which sought to draw a distinction between the application of the Policy in the Green Belt and in the rest of the rural area.

10.7.19. The Council proposed several changes to the Policy and the reasoned justification to accommodate some aspects of the Objections. Two Objections were conditionally withdrawn as a result. The main issue was whether further changes were necessary to provide a balanced and reasonable policy in accordance with the advice.

Consideration

10.7.20. A brief resume of the advice of PPG2 and PPG7 is given in Paragraph 10.39 supporting the previous Policy. Objectors referred to the potential value of redundant buildings if residential conversion can be undertaken and the effect this can have on the asset value of a rural holding, particularly in the Plan area where the demand for housing is high and the supply of housing in rural areas strictly limited. However, the advice is clear and the background to the Plan supports the view that small business and the support and diversification of the rural economy should have priority over the provision of housing. The advice accepts that there may be circumstances in which conversion for business use may be impracticable, unsuitable, or acceptable only as part of a business scheme. I consider it is right that the Policy should be restrictive in its tone. Two circumstances in which residential use could be accepted were given in the Policy, The Council proposed the addition of a third to cover unsuitability thorough location or design (PC117), an appropriate change that would meet the concerns of some of the Objectors.

10.7.21. The first of the circumstances referred to in the preceding paragraph was that "every reasonable attempt has been made to secure a suitable employment, community or business reuse for the building". This, together with Paragraph 10.43, largely quoted from paragraph 3.15 of PPG7. The Council considered that "employment" should be dropped, the advice referring to "business" use, and, for the reasons given in relation to the previous Policy, I accepted that to be appropriate. "Community use" does not figure in paragraph 3.15 of PPG7 specifically. In this Policy its inclusion is more significant than in the previous Policy, as would-be developers are asked to explore this as an alternative use, rather than see it as a use that would be permitted. However, I accepted the Council's view that in an area where new building is necessarily restricted, if there are local community needs that could reasonably be met by the reuse of existing buildings and a business use was not practicable, the opportunity should be given for this to be considered before residential use were accepted.

10.7.22. As deposited, the reasoned justification did not elaborate on what would be required by way of support for the efforts made to secure a business or community reuse of a building before a residential use was considered. It was proposed in PC117 to require the production of evidence that the premises had been marketed at an appropriate price for a period of 12 months. I consider that it is desirable to spell out in the Plan what the requirement is in practice, and did not see what was proposed as unreasonable.

10.7.23. In the criteria words such as "detract", "detriment" and "harm" are used without qualification, which was a source of Objection. The Council saw the addition of

such words as "significant" or "significantly" as tending to weaken the Policy by making it less restrictive on developments that have an adverse effect on the countryside. It is perhaps now axiomatic that for an adverse effect to form the basis of refusing development it has to be clearly recognisable as adverse and not trivial. I do not recommend that the Policy be changed and have no doubt that in the application of the Policy the Council would have this distinction in mind.

10.7.24. Although not referred to in the written representations submitted by the Council in respect of this Policy, in respect of the previous Policy the criteria relating to ancillary development beyond the building concerned were proposed to be made more simple. It would be appropriate to do the same in this Policy, removing Criteria 4 and 5 and substituting the one suggested earlier.

CHAPTER 10. RECOMMENDATION 22.

- 10.7.10. That PC117 be made in so far as it applies to this Policy.
- 10.7.11. That in Policy 99RE10 Criteria 4 and 5 be deleted and the following Criterion substituted:-

ANY ASSOCIATED BUILDINGS, STRUCTURES OR ACTIVITIES
(INCLUDING PARKING AND OPEN STORAGE) WOULD NOT
HARM THE VISUAL AMENITY OF THE COUNTRYSIDE.

POLICY 99RE11. NEW AGRICULTURAL DWELLINGS

Objectors

<i>Objection 339</i>	<i>GOSE</i>
<i>Objection 1095</i>	<i>Councillor Mrs S Greenleaf</i>

Background

10.7.25. The National advice on the provision of new agricultural dwellings in the countryside is detailed and long standing. The Policy is framed to closely resemble that given in "Better Local Plans", itself based on the advice, and is comprehensive in its coverage of the likely issues.

Consideration

10.7.26. The Objection of GOSE was that the Policy did not distinguish between proposals in the Green Belt and those in the countryside elsewhere. The Council pointed out that, while different documents may relate to the Green Belt and the countryside in general, in so far as new dwellings for agricultural or forestry workers are concerned, for all practical purposes the advice is the same. Necessary dwellings can come within the new building seen

as appropriate for agriculture and forestry by Green Belt policy. I considered no change to be necessary, or separate Policies to be required, to take account of the different designations.

10.7.27. Councillor Mrs Greenleaf sought inclusion of catteries and kennels among the activities for which it would be appropriate to provide dwellings. The implication of the Objection appeared to be that countryside locations would be more suitable for such business activities than residential areas.

10.7.28. A technical difficulty in the way of accepting Councillor Mrs Greenleaf's point is that the Policy has the specific purpose of supporting agriculture and forestry by allowing an exception to normal housing location policies to meet the special needs of these rural activities. Catteries and kennels are not included within the definition of agriculture or forestry given in Section 336 of the Act and are, therefore, excluded from the narrow purposes of the Policy. Whether there should be a further concession in respect of these uses is another matter. However, a similar case could be made for other activities that could find a rural location convenient and the main objective of keeping the countryside (whether it be Green Belt or not) free of unnecessary building has to prevail. In any particular instance it is open to show that there are circumstances that justify an exception, but these are likely to be unusual and not capable of ready definition. They would not justify a separate Policy.

10.7.29. I do not recommend that any change is made to this Policy.

POLICY 99RE12 TEMPORARY HOUSING ACCOMMODATION IN THE
 COUNTRYSIDE FOR AN AGRICULTURAL OR FORESTRY
 WORKER

Objectors.

<i>Objection 340</i>	<i>GOSE</i>
<i>Objection 1900</i>	<i>CPRE Surrey (CW)</i>

Background

10.7.30. The Policy is similar to that preceding it, applying, as the guidance suggests, the same restrictive approach to the provision of temporary accommodation as to permanent development. In many instances such provision is sought to allow a new agricultural holding to be formed and it is, therefore, necessary to establish that it will be viable in the longer term before permanent accommodation is considered. The Policy is in a form commonly used.

Consideration

10.7.31. The Objection of GOSE was that the Policy did not distinguish between Green Belt and other rural locations. The guidance in respect of agricultural buildings does not make this distinction and I could see no good reason to make the distinction in the Plan.

10.7.32. CPRE were concerned that any development under the Policy should be adequately screened. This and other matters of siting and design would be important if permission were to be given, but would be covered by other Policies of the Plan.

10.7.33. I see no need to recommend changes to the Policy.

POLICY 99RE13 NEW AGRICULTURAL BUILDINGS

Objectors

Objection 495

MAFF

Objection 1529

Loseley Estate (CW)

Objection 1669

Country Landowners Association (CW)

Background, Objections and Issues

10.7.34. Much development for new buildings on agricultural land is permitted development under the Town and Country Planning (General Permitted Development) Order 1995. However, much is outside the scope of these permissions, notably in the AONB, and is subject to normal planning control. A Policy which concerns itself initially with the need for new buildings and then their siting and design is appropriate to the Plan.

10.7.35. The Policy requires proposals to meet four criteria, the fourth being conditional on there being a need for surveillance of the use of the building. There were a number of Objections to the wording of the criteria, principally that they were not sufficiently flexible for the Policy to achieve its purpose of permitting necessary development while protecting the character and appearance of rural areas. The Council proposed several changes to the criteria in response (PC118). The main issue was whether these were sufficient.

Consideration

10.7.36. In so far as Criterion 1 was concerned, the Objection of MAFF was that the Criterion restricted development to that necessary for an individual holding. It was suggested that "They are reasonably necessary for the purposes of agriculture" be substituted. This is a phrase used in PPG7 and also in the General Permitted Development Order and on that basis can be considered to have some authority. The Council proposed deleting "wholly" and adding "reasonably", and although this satisfied MAFF, leaving reference to the holding, it would seem preferable to substitute the whole phrase from the advice or the Order, that is to say, "They are reasonably necessary for the purposes of agriculture within the unit".

10.7.37. MAFF was concerned also with Criterion 2, which it was thought went beyond the guidance. It was pointed out that it was not always possible to avoid siting farm buildings in a "prominent or exposed location". PPG7 advises that the siting of buildings should take account of the operational needs of farming. The Council suggested that "... are located with particular care to minimise their effect on the landscape ..." be added, a phrase which MAFF pointed out comes from advice related to grain stores.

10.7.38. The Loseley Estate, who were also concerned that the Criterion in its original form was too restrictive and suggested their own form of words were satisfied with the Council's proposal. The Country Landowners Association pointed to the difficulties this and Criterion 4 could give in providing necessary buildings. I could accept that the agricultural requirement should be the key factor in location, but also that the siting of buildings should as far as possible have regard to the landscape. I accepted that a Criterion concerned with siting was necessary; the other Criteria covered this only in relation to a need for surveillance. I did not see a phrase initially relating to grain stores as inappropriately applied to other agricultural buildings, which might also be sizeable and prominent. On balance, I considered that the Council's proposed changes to this Criterion and Criterion 4 went far enough, retaining control while adding flexibility.

10.7.39. Criterion 3 was criticised by MAFF for its reference to "the local traditions for agriculture" in addition to compatibility with the landscape and adjoining buildings. It is a difficult phrase to interpret and its purpose would seem to be met by adding "size" to design and materials in the Criterion and seeking compatibility only with the landscape and neighbouring buildings (PC118). This solution satisfied the Objector.

CHAPTER 10. RECOMMENDATION 23.

10.7.12. That PC118 be made, except that in Policy 99RE13 for Criterion 1 the following be substituted:-

THEY ARE REASONABLY NECESSARY FOR THE PURPOSES OF AGRICULTURE WITHIN THE UNIT.

POLICY 99RE14 EXTENSION OF RESIDENTIAL CURTILAGES INTO THE COUNTRYSIDE

10.7.40. This Policy attracted a number of expressions of support, but none of Objection.

8. PROPOSED NEW POLICY: TELEPHONE EXCHANGES IN THE GREEN BELT

Objector

Objection 401

British Telecommunications Plc

10.8.1. The suggestion was for a specific Policy to set out the acceptable uses for redundant telephone exchanges in the Green Belt. The redevelopment of these buildings, as other employment uses, is well covered by the Plan, depending on whether they are in the defined settlements or beyond. I did not see a need to single out these buildings for mention, nor to accord them a separate Policy.

CHAPTER 11. HISTORIC ENVIRONMENT

1. INTRODUCTION

11.1.1. The Introduction draws attention to the rich heritage of the Plan area, to the broad layout of the Chapter and to the importance of the Design Code (Policy 99G2) in matters of conservation and the protection of buildings and their settings. There was one Objection that fitted under this heading.

Objection 1453

West Horsley Parish Council (CW)

11.1.2. The Parish Council asked for an urgent assessment of many buildings in the Parish, which, in their view, should be on the Statutory List. The Council indicated the normal procedures, and that reviews are currently being carried out, in which West Horsley will be included.

2. OBJECTIVES

11.2.1. The single Objective embraced the purposes of the Policies of the Chapter and attracted no Objections.

3. SUPPORTING MEASURES

11.3.1. The Section outlined the background of legislation, procedures, advice and support available in respect of Listed Buildings and Conservation Areas in addition to the Policies of the Plan. An addition to the Section proposed by the Council (PC119) gave the requirement for supporting details to accompany applications affecting buildings locally listed. Two Objections related to the Section:-

Objectors

Objection 699

West Clandon Parish Council

Objection 1670

Country Landowners Association

11.3.2. West Clandon Parish Council asked for the process for extending Conservation Areas to be streamlined. The Parish Council had applied for an extension to the village Conservation Area, which had taken some time to process. This may well be a matter for the Council to consider, but the procedures for the designation of Conservation Areas and their extension, if need be, are separate from those of the Plan.

11.3.3. The Country Landowners Association asked for a more flexible approach to use of listed farm buildings, pointing out that an economic use is the best approach to preservation. The Council, as I, accepted this, and pointed to Policies 99RE9 and 99RE10 in the previous Chapter, which promoted the reuse of rural buildings.

11.3.4. One further Objection related to the Chapter, although not attributable to a particular Section:-

Objector

Objection 1722

Abbots Hospital

11.3.5. The Objection sought a specific Policy relating to the Hospital, noting that a Policy was included in the Plan which related to Guildford Cathedral. The Objections relating to Abbots Hospital were considered in Chapter 4.

CHAPTER 11. RECOMMENDATION 1.

11.3.1. That PC119 be made.

4. LISTED BUILDINGS

11.4.1. GOSE Objected to the Policies of this and the following Section. It was pointed out that the Courts have determined that Section 54A of the Act does not apply to the determination of applications for listed building consent or conservation area consent, which are referred to in a number of the Polices. While these Polices may be used to determine planning applications affecting listed buildings or Conservation Areas, the references to listed building or conservation area consent applications should be omitted.

11.4.2. The Objections referred to paragraph 2.4 of PPG15, Planning and the Historic Environment, the principal source of national advice on the topic. PPG15 looks to the totality of planning for the historic environment, which includes the specific roles of listing, of conservation and the development plan. In so far as the development plan is concerned, its role is to include all considerations which will be of relevance to determining a planning application. This may well include elements of listed building and conservation policy and the need is to ensure that the distinction between the different roles is clear while maintaining an overall view of the objectives.

11.4.3. The Council proposed rewording for Policies 99HE1, 99HE3, 99HE6 and 99HE10 and their reasoned justifications to meet the Objections, in so far as these Policies were concerned. Other Polices to which GOSE had made the same Objection were not proposed to be changed, because they did not include reference to these other roles. I have considered the Policies individually, bearing in mind the Council's proposed changes, there being further Objectors raising other matters.

11.4.4. Planning applications are likely to affect listed buildings in four main ways, by proposing total or partial demolition, alteration or extension, changes of use and development which can change their setting. It is normally most practical to do as is done in the Plan and approach these circumstances through individual Policies.

POLICY 99HE1 PROPOSALS WHICH AFFECT LISTED BUILDINGS

Objector

Objection 2063

GOSE

11.4.5. This was the first of the Policies to which GOSE took exception, because of the references in the Policy and the reasoned justification to applications for listed building consent. I consider that it is helpful for the reasoned justification to carry the reminder that there is a procedure for listed building consents to be obtained where listed buildings are concerned and to point to the source of information as to the policies and procedures involved, in this instance to be included in Supplementary Planning Guidance. I recommend that the wordings proposed by the Council be substituted for those of the deposited Plan. They were not accorded a PC number and for this reason are repeated in full in the recommendation.

CHAPTER 11. RECOMMENDATION 2.

11.4.1. That Policy 99HE1 and its reasoned justification be deleted and the following substituted:-

POLICY 99HE1

PROPOSALS WHICH AFFECT LISTED BUILDINGS

PLANNING PERMISSION WILL BE GRANTED FOR ALTERATIONS AND ADDITIONS WHERE:-

1. THE PROPOSAL DOES NOT DETRACT FROM THE CHARACTER OR SETTING OF THE BUILDINGS; AND
2. THE PROPOSAL RESPECTS AND ENHANCES THE ORIGINAL ARCHITECTURE, SCALE, MATERIALS, COLOUR, DETAILING AND OTHER SIGNIFICANT FEATURES OF THE BUILDING.

Reasoned justification

11.8. THE LISTING OF AN HISTORIC BUILDING IS INTENDED TO ENSURE THAT THE CASE FOR ITS PRESERVATION IS CONSIDERED FULLY BEFORE ANY ALTERATION CAN TAKE PLACE. MANY HISTORIC BUILDINGS CAN ACCOMMODATE SOME FORM OF ALTERATION OR ADDITION, BUT THE BOROUGH COUNCIL WILL REQUIRE SUCH PROPOSALS TO RESPECT AND RETAIN THE SPECIAL HISTORIC AND ARCHITECTURAL CHARACTER OF THE BUILDING.

11.9. ANY PROPOSALS WHICH WOULD AFFECT THE CHARACTER OF A LISTED BUILDING WILL REQUIRE LISTED BUILDING CONSENT, EVEN WHEN PLANNING PERMISSION ITSELF MAY NOT BE REQUIRED. LISTED BUILDING CONSENT IS A SEPARATE, BUT PARALLEL PROCESS TO THAT FOR PLANNING PERMISSION. THE BOROUGH COUNCIL WILL BE PRODUCING SUPPLEMENTARY PLANNING GUIDANCE CONTAINING THE DETAILED POLICIES AND PROCEDURES FOR DEALING WITH LISTED BUILDING CONSENT APPLICATION.

POLICY 99HE2 CHANGES OF USE OF LISTED BUILDINGS

Objectors

Objection 522
Objection 1671

Guildford Diocesan Board of Finance
Country Landowners Association

Objections and Issues

11.4.6. The Policy permitted changes of use where an existing use was no longer practical or suitable, if it would preserve or restore the building and any associated works were acceptable. The Objectors considered the reference to associated works to be too restrictive and as a result likely to prevent changes of use which could provide an economic use that would ensure the preservation of a building. I saw the main issue as whether the Policy lacked a necessary flexibility.

Consideration

11.4.7. The particular concern raised by the Diocesan Board of Finance was that the Policy suggested that the subdivision of any large volume of interior space would be resisted. Churches are mentioned as buildings where this would apply, if the internal character of the building would be affected. In the Objector's experience there was often no alternative to internal subdivision if a church were redundant, listed and the objective was its preservation. This need not detract from its character, appearance, architectural or historic features. An alternative wording was suggested for the second criterion:-

"Any associated works or conversion would not detract from the character or appearance of the building or its setting."

11.4.8 The Country Landowners Association asked for the addition of a measure of reasonableness to the detraction or damage referred to.

11.4.9. PPG15 has a section dealing specifically with changes of use. It is there said that the Secretary of State is not generally in favour of tightening controls over changes of use as a specific instrument of conservation policy, the advice having earlier said that new

uses may often be the key to preservation. The Council did not depart from this, and explained that the second criterion was doing no more than summarising the main points of Annex C of PPG15, the guidance on alterations to listed buildings.

11.4.10. I considered that having regard to the advice, the opening paragraph of the Policy was too negative in its attitude to changes of use. A simpler and more direct wording that did not refer to the present uses was more appropriate. As to the second criterion, this was concerned with physical alterations to listed buildings, a control of the planning aspects of which is provided by the preceding Policy. However, I can see that the necessity for alterations and an assurance that they could be satisfactorily carried out would be a consideration in coming to a decision on a change of use. This might be achieved by requiring proposals to be accompanied by details of alterations, on the line of Policy 3.2.4 in "Better Local Plans", or by the substitution for the second criterion of wording similar to that suggested by the Diocesan Board of Finance. My suggestion in the recommendation includes something of each.

CHAPTER 11. RECOMMENDATION 3.

11.4.2. That Policy 99HE2 be deleted and the following substituted:-

PLANNING PERMISSION WILL BE GRANTED FOR THE CHANGE OF USE OF THE WHOLE OR PART OF A LISTED BUILDING WHERE:-

1. IT WOULD PRESERVE OR RESTORE THE BUILDING;
AND
2. ANY ASSOCIATED WORKS WOULD NOT DAMAGE OR DETRACT FROM THE FEATURES OF SPECIAL ARCHITECTURAL OR HISTORIC INTEREST OF THE BUILDING, ITS CHARACTER, APPEARANCE OR SETTING.

POLICY 99HE3 THE DEMOLITION OF LISTED BUILDINGS

Objector

Objection 2064 *GOSE*

11.4.11. The Objection was that mentioned in the introduction to this Section. The Council proposed to substitute a new wording for the Policy and the reasoned justification. These I accepted and they are incorporated in the recommendation.

CHAPTER 11. RECOMMENDATION 4.

11.4.3. That Policy 99HE3 and its reasoned justification be deleted and the following substituted:-

POLICY 99HE3
THE DEMOLITION OF LISTED BUILDINGS

PLANNING PERMISSION WILL NOT BE GRANTED FOR ANY DEVELOPMENT WHICH WOULD REQUIRE THE WHOLE OR PART DEMOLITION OF A LISTED BUILDING.

Reasoned justification

11.00. LISTED BUILDINGS REPRESENT A FINITE RESOURCE AND AN IRREPLACEABLE ASSET. THE WHOLE OR PARTIAL DEMOLITION OF A LISTED BUILDING WILL BE STRONGLY RESISTED. THERE MAY BE EXCEPTIONAL CIRCUMSTANCES WHERE SOME LOSS OF A HISTORIC STRUCTURE MAY BE UNAVOIDABLE. IN SUCH CASES THERE WILL BE A REQUIREMENT FOR A DETAILED PROFESSIONAL RECORDING OF THE HISTORIC STRUCTURE THAT WILL BE DESTROYED.

POLICY 99HE4 THE LOCAL LIST
POLICY 99HE5 DEMOLITION OR PART DEMOLITION OF LOCALLY LISTED BUILDINGS

Objectors

<i>Objection 341</i>	<i>GOSE</i>
<i>Objection 698</i>	<i>West Clandon Parish Council</i>
<i>Objection 1672</i>	<i>Country Landowners Association</i>
<i>Objection 2049</i>	<i>GOSE (CW)</i>

Background, Objections and Issues

11.4.12. The Local List of buildings of architectural or historic interest is drawn up by the Council and, except where such buildings are in Conservation Areas, cannot rely on the historic building legislation for their protection. In this respect they are dependent on the policies of the development plan, policies which cannot seek to impose controls not given by the legislation or to override permissions given in general, as in the General Permitted Development Order.

11.4.13. For the most part, the buildings included in the Local List are likely to be buildings of lesser importance than those that are statutorily listed, but of value locally, for historic reasons, for their intrinsic merits or their contribution to the local scene. As the

Council pointed out, the preparation of Local Lists is not new and was given recognition in PPG15. This can be seen as a mark of the Government's interest in protecting the historic environment, but it gave no additional powers. The two Policies are the only policies in the Plan concerned with the Local List and are considered together for this reason, the Objections relating to them both. Both Policies were seen to be over restrictive or to include inappropriate matters. The main issues concerned the appropriateness of including the Policies in the Plan and, if they were accepted, their wording.

Consideration

11.4.14. For the reasons given above, many local plans do not include policies relating to the Local List, relying on a statement that the a List has been prepared which is seen primarily as a means of ensuring that these buildings are taken into account when development comes forward. I consider that it is important that the Plan does not appear to confuse the Local List with the Statutory List, or appear to borrow powers from the latter. The juxtaposition of the Policies in this Chapter is, in my view, an encouragement to confusion and if the Policies are to be included they should be either in a separate Section, or at the end of this Section.

11.4.15. GOSE and the Country Landowners Association may have had in mind the difficulty of framing Policies for the Local List in their views that the Policies were too demanding and inflexible, with the implied suggestions that they should be omitted. It may be that the objectives of the Policies - the protection of the Local List buildings - would be better achieved through encouragement and advice. The General Policies, for example, could be a better policy tool than a separate Policy here. This Section may need to do no more than is done in many plans, draw attention to the Local List and the purposes of drawing it up, making reference to its use to ensure that buildings of local importance are not overlooked, and, where appropriate, that their value and that of their settings is taken properly into account when applications for development are considered.

11.4.16. My preferred recommendation is, therefore, that these Policies be omitted and in their place a statement included on the lines of the last sentence of the preceding paragraph. A suggestion is in the recommendation. I, nevertheless, noted the importance the Council attached to these Policies and have given consideration as to whether there might be an appropriate form of words that could be suggested. I considered that GOSE was right in its criticism of the wording, as was the Country Landowners Association more general point. The Parish Council's concerns were more of an administrative nature and did not require changes to the Plan. In the recommendation I have put forward a form of words for the Council's consideration as an alternative to my first recommendation, and as an indication of what I see to be the appropriate extent of such a policy. The reasoned justification would need reconsideration, but could be based on that for Policy 99HE4. A suggestion for this is also included.

CHAPTER 11. RECOMMENDATION 5.

11.4.4. That the section of the Chapter concerned with the Local List be separated from the section concerned with Statutorily Listed buildings.

- 11.4.5. That Policy 99HE4 and Policy 99HE5 be omitted and in their place substituted a statement:-

IN ADDITION TO THE STATUTORY LIST OF BUILDINGS OF ARCHITECTURAL OR HISTORIC INTEREST COMPILED BY THE DEPARTMENT OF THE ENVIRONMENT, THE COUNCIL IS PREPARING A LIST OF BUILDINGS WHICH DO NOT MEET THE CRITERIA FOR INCLUSION ON THE STATUTORY LIST BUT DO HAVE IMPORTANT LOCAL SIGNIFICANCE. THERE IS NO SPECIFIC STATUTORY DUTY OR POWERS AVAILABLE, BUT IN THE EXERCISE OF ITS POWERS FOR THE CONTROL OF DEVELOPMENT AND IN ANY OTHER WAYS AVAILABLE THE COUNCIL WILL AIM TO PROTECT THESE BUILDINGS AND THEIR SETTINGS.

- 11.4.6. If Recommendation 11.4.5 is not accepted, Policy 99HE4 and Policy 99HE5 and their reasoned justifications be deleted and in their place substituted a single Policy:-

IN CONSIDERING APPLICATION FOR DEVELOPMENT AFFECTING BUILDINGS INCLUDED ON THE LOCAL LIST THE COUNCIL WILL HAVE REGARD TO THE EFFECTS OF THE DEVELOPMENT ON THE ARCHITECTURAL OR HISTORIC INTEREST OF THE BUILDING AND ITS SETTING.

Reasoned Justification

11.15. AS IN THE DEPOSITED PLAN.

11.16. AS IN THE DEPOSITED PLAN.

11.17. INCLUSION OF BUILDINGS IN THE LOCAL LIST ACCORDS NO SPECIAL POWERS FOR THE CONTROL OF DEVELOPMENT EFFECTING THESE BUILDINGS, BUT IN CONSIDERING APPLICATIONS THE COUNCIL WILL TAKE INTO ACCOUNT THEIR LOCAL IMPORTANCE AND WILL EXPECT APPLICANTS TO SHOW WHAT EFFECTS THERE WOULD BE ON THESE BUILDINGS OR THEIR SETTINGS WHEN SUBMITTING THEIR PROPOSALS.

POLICY 99HE6 NEW DEVELOPMENT WHICH AFFECTS THE SETTING OF A LISTED BUILDING

Objectors

Objection 2065

GOSE

11.4.17. The Objection of GOSE concerned the inclusion in the Policy of reference to listed building consent. The Council proposed a redraft of the Policy and its reasoned justification which I have included in the recommendation.

11.4.18. Abbots Hospital, concerned for the environment of the Hospital, located as it is in Guildford Town Centre, sought the addition of a further clause to the reasoned justification, that would draw attention to the necessity of protecting the amenity and environment of listed buildings from inappropriate uses. The Objections of the Hospital were considered in Chapter 4.

CHAPTER 11. RECOMMENDATION 6.

11.4.7. That Policy 99HE6 and its reasoned justification be deleted and in its place substituted:-

POLICY 99HE6
NEW DEVELOPMENTS WHICH AFFECTS THE SETTING OF A LISTED BUILDING

PLANNING PERMISSION WILL NOT BE GRANTED FOR DEVELOPMENT WHICH AFFECTS ADVERSELY THE SETTING OF A LISTED BUILDING BY VIRTUE OF DESIGN, PROXIMITY OR IMPACT ON SIGNIFICANT VIEWS.

Reasoned justification

11.00. THE SETTING IN WHICH A LISTED BUILDING STANDS MAKES A VITAL CONTRIBUTION TO THE OVERALL CHARACTER AND QUALITY OF THE BUILDING. WHEN DEVELOPMENT PROPOSALS ARE CONSIDERED FOR SITES WITHIN THE VICINITY OF A LISTED BUILDING THE BOROUGH COUNCIL WILL GIVE CAREFUL CONSIDERATION TO THE LOCATION, DESIGN AND SCALE OF THE PROPOSAL TO ENSURE THAT IT WOULD NOT HAVE A DETRIMENTAL EFFECT ON THE LISTED BUILDING OR ITS SETTING.

POLICY 99HE7 ADVERTISEMENTS ON LISTED BUILDINGS

Objector

Objection 2066

GOSE

11.4.19. The objection of GOSE again referred to Section 54a of the Act in relation to listed building consents. In most instances, the display of advertisements will require listed

building consent as an "alteration", but there will remain a need for advertisement consent and a policy base for the consideration of applications is not inappropriate in the Plan. I make no recommendation to change this Policy.

5. CONSERVATION AREAS

POLICY 99HE8 NEW DEVELOPMENT IN CONSERVATION AREAS

Objectors

<i>Objection 679</i>	<i>Rank Leisure Division</i>
<i>Objection 1375</i>	<i>Effingham Parish Council</i>
<i>Objection 1454</i>	<i>West Horsley Parish Council (CW)</i>
<i>Objection 2067</i>	<i>GOSE</i>

Objections and Issues

11.5.1. The Policy stresses the objective of designating Conservation Areas - the preservation or enhancement of the character or appearance of the area - and sets out six matters to which the Council will give regard in considering proposals for development in these areas. In this instance, I did not see that the Policy needed to be changed to take account of the GOSE Objection, which served as a reminder that Section 54a of the Act does not apply in the case of Conservation Area consents. The Policy or its reasoned justification could be seen to be equivocal in its reference to "applications", but I do not recommend a change. The Objection of West Horsley Parish Council was a comment on the application of policy in the Conservation Area of the village. This was not a matter on which I could fairly give a view, but the Objection was effectively withdrawn.

11.5.2. The other two Objectors asked for additions to the list of matters and whether these should be included was the main issue.

Consideration

11.5.3. The Objections of Effingham Parish Council asked for the Policy to be strengthened to refer to alterations to buildings and to protect boundary walls, particularly those of flint in the village Conservation Area. These are often matters that will require planning permission, although there are limitations to the powers for minor works and changes to walls. It would not be appropriate for the Policy to seek to control matters not otherwise subject to planning control, but in most instances the Parish Council's concerns would be met by the Policy as it stands.

11.5.4. Rank Leisure pointed to the need to allow for the replacement of buildings which have reached the end of their useful lives, or are unsafe. The Policy does not, however, prevent redevelopment that will further the objectives of conservation. I did not see that a further criterion was required.

POLICY 99HE9 ADVERTISEMENTS IN CONSERVATION AREAS

Objector

Objection 2068

GOSE

11.5.5. The Objection drew attention to Section 54A of the Act not being applicable to advertisement control. The policies of the Plan are, nevertheless, material considerations to be taken into account. The advice in PPG15 and PPG19 draws special attention to advertisement control in Conservation Areas. I have given consideration to the wording of the Policy, for example, whether "permission" should be replaced by "consent", but concluded that the Policy, in a form limited to the objectives of conservation, was acceptable as it was.

POLICY 99HE10 DEMOLITION IN CONSERVATION AREAS

Objectors

Objection 542

Prudential Portfolio Managers

Objection 680

Rank Leisure Division

Objection 2069

GOSE

11.5.6. The advice of PPG15 suggests that the general presumption should be in favour of retaining buildings which make a positive contribution to the character or appearance of a Conservation Area. In such cases proposals are to be assessed on much the same basis as the demolition of listed buildings. In other cases, there is a need for full information as to what is proposed to replace the building. The control of demolitions under the powers relating to Conservation Areas and those of the planning application are thus difficult to separate.

11.5.7. GOSE criticised the Policy for making policy statements where other legislation was available to achieve the same objectives. The Council suggested a rewording of the Policy, which would remove the implication that it was concerned primarily with Conservation Area consents rather than planning applications. The Objection of Rank Leisure Division suggested the addition of "normally" to the Policy. This has been a device for adding flexibility to Policies, but in recent years the precept that the consideration of planning applications will always allow for the exceptional case has shown it to be unnecessary.

11.5.8. Prudential Portfolio Managers were concerned that the Policy was not faithfully following the criteria of PPG15 regarding the demolition of buildings in Conservation Areas. My only suggestion in this respect is to replace "detracts from" in the first criterion with "makes little or no contribution to". I consider that this further matter should be added also to the list of considerations in the first of the proposed Paragraphs of the reasoned justification.

CHAPTER 11. RECOMMENDATION 7.

11.5.1. That Policy 99HE10 and its reasoned justification be deleted and in its place substituted:-

POLICY 99HE10
DEMOLITION IN CONSERVATION AREAS

DEVELOPMENT WHICH INVOLVES DEMOLITION OF A BUILDING IN A CONSERVATION AREA WILL ONLY BE PERMITTED WHERE:

1. THE EXISTING BUILDING MAKES LITTLE OR NO CONTRIBUTION TO THE CHARACTER OR APPEARANCE OF THE AREA; OR
2. ITS POTENTIAL FOR REPAIR, RETENTION AND BENEFICIAL USE IS LIMITED; AND
3. APPROVAL HAS BEEN GRANTED FOR A REPLACEMENT SCHEME WITH AN AGREED TIMESCALE.

Reasoned Justification

11.00. DEVELOPMENT WHICH REQUIRES THE DEMOLITION OF BUILDINGS WITHIN A CONSERVATION AREA WILL USUALLY BE RESISTED. HOWEVER, THERE MAY BE CASES WHERE PROPOSALS REQUIRING DEMOLITION WOULD BE CONSIDERED AND THE FOLLOWING FACTORS WILL BE TAKEN INTO ACCOUNT:

- (i) THE CONTRIBUTION OF THE BUILDING TO THE CHARACTER AND APPEARANCE OF THE CONSERVATION AREA;
- (ii) THE CONDITION OF THE BUILDING AND THE COST OF REPAIR AND MAINTENANCE IN RELATION TO THE VALUE DERIVED FROM ITS CONTINUED USE;
- (iii) THE ADEQUACY OF EFFORTS MADE TO RETAIN THE BUILDING IN USE. IT SHOULD BE DEMONSTRATED THAT REAL EFFORTS HAVE BEEN MADE TO CONTINUE THE PRESENT USE OR FIND A COMPATIBLE ALTERNATIVE;
- (iv) THE MERITS OF THE ALTERNATIVE PROPOSALS FOR THE SITE.

11.00. THE WHOLE OR SUBSTANTIAL DEMOLITION OF BUILDINGS WITHIN CONSERVATION AREAS REQUIRES

CONSERVATION AREA CONSENT. THE COUNCIL WILL PRODUCE SUPPLEMENTARY PLANNING GUIDANCE ON THE DETAILED POLICIES AND PROCEDURES FOR DEALING WITH APPLICATIONS FOR DEMOLITION IN CONSERVATION AREAS.

POLICY 99HE11 REPLACEMENT OF DESTROYED BUILDINGS IN CONSERVATION AREAS

Objector

Objection 2070

GOSE

11.5.9. The Objection was to the inappropriate use of a policy statement to secure objectives achievable under other legislation. In this instance, the Policy is concerned with the replacement of buildings demolished without the appropriate consents, where required. The Policy is concerned primarily with the enforcement of control under the Conservation Area and other planning legislation. In Policy terms, it adds nothing of significance to the preceding Policy, where the considerations for demolition, and by inference replacement, are set down. I consider this Policy to be inappropriate, for the reasons GOSE advance, and unnecessary.

CHAPTER 11. RECOMMENDATION 8.

11.5.2. That Policy 99HE11 and its reasoned justification be omitted.

POLICY 99HE12 DEVELOPMENT WHICH AFFECTS THE SETTING OF A CONSERVATION AREA

Objectors

Objection 681

Rank Leisure Division

Objection 2043

GOSE

11.5.10. Rank Leisure Division considered the Policy unnecessary, the Council already being under an obligation by statute to have regard to the preservation or enhancement of a Conservation Area. The site by site approach preferred would not require a blanket policy such as this. GOSE were concerned that the term "setting" was imprecise and a definition should be given.

11.5.11. PPG15, paragraph 4.14, talking about the use of planning powers in Conservation Areas, referred to the handling of development proposals outside a Conservation Area which could affect its setting, or views into or out of the area. Accepting Rank Leisure Divisions point, I, nevertheless, saw this as a matter that is appropriately covered by the Plan.

11.5.12. I saw the Policy as reasonably applying in general to Conservation Areas. "Setting" has a dictionary definition and a meaning that is commonly understood. How the Policy will impact on individual proposals will depend on what is proposed and where. It was noticeable that PPG15 and other documents having a bearing on the topic, not least the Council's representations, defined "setting" by examples rather than a form of words. If greater clarity is to be given to the meaning of "setting" in the Plan, to give some instances could be the best approach. In the recommendation I give an example of what I have in mind rather than something the Council should necessarily copy.

CHAPTER 11. RECOMMENDATION 9.

11.5.3. That a further paragraph be added to the reasoned justification of Policy 99HE12:-

FOR MOST CONSERVATION AREAS THERE ARE STATEMENTS AS TO THE FEATURES OF THE AREA THAT HAVE LED TO ITS DESIGNATION. THESE MAY INCLUDE VIEWS INTO OR OUT OF THE AREA, WHICH COULD BE AFFECTED BY DEVELOPMENT EVEN AT SOME DISTANCE, OR THE SKY LINE, WHERE THE HEIGHT OF NEW BUILDING COULD BE SIGNIFICANT. EXAMPLES OF VIEWS AND SENSITIVITY TO THE HEIGHT OF NEIGHBOURING BUILDINGS ARE TO BE FOUND IN MANY VILLAGE CONSERVATION AREAS AND ARE PARTICULARLY NOTABLE IN THE CASE OF GUILDFORD TOWN CENTRE, WHERE VIEWS FROM MANY OF THE MAIN STREETS ARE TO THE OPEN LAND OF THE SURROUNDING HILLS.

6. ANCIENT MONUMENTS AND ARCHAEOLOGY

POLICY 99HE13 SCHEDULED ANCIENT MONUMENTS AND OTHER KNOWN ARCHAEOLOGICAL SITES

Objector

Objection 200

Surrey County Council (CW)

11.6.1. The County Council suggested changes to the introduction to the Section and to the Policy, to ensure a consistency in terminology and to add references to the educational and recreational potential of these monuments. The Council proposed changes to Paragraph 11.37, the Policy and to Appendix 4 which satisfied these Objections (PC122). A further point concerning advice to prospective developers had also been incorporated.

CHAPTER 11. RECOMMENDATION 10.

11.6.1. That PC122 be made.

POLICY 99HE14 AREAS OF HIGH ARCHAEOLOGICAL POTENTIAL

Objector

Objection 2050

GOSE

11.6.2. The Objection to the Policy was that it was dealing with matters that were essentially procedural. That appeared to me to be a correct view of the Policy in the way it is expressed. The justification given was that the Policy, and the Policy which follows, had been based on the advice of the County Council's Archaeological Officer, who, in seeking conformity of approach in Surrey local plans, had given the same advice to other district authorities.

11.6.3. I accept the Council's arguments that the rather complicated procedure where development could affect these sites and areas should be explained in the Plan. I doubted whether it needed to be expressed as a Policy, although there are matters of importance to policy which should be included. My reasons for saying that are that the procedure is intended to allow for an assessment of the archaeological value of the remains on these identified sites before determining the attitude to development - whether it will be prevented, or allowed after further exploration and/or measures to preserve or record the remains.

11.6.4. I have not in this instance recommended the form a Policy might take; the Council may wish in the interests of preserving a common approach in the County to discuss this with the County Archaeologist. I would, however, see this Policy demoted to inclusion in the reasoned justification of a Policy which protected in situ remains of significant value and set out the circumstances in which development might be permitted where remains were of lesser importance.

11.6.5. The sites/areas with which this Policy is concerned are listed in Appendix 4 of the Plan. It would to my mind be appropriate to include them on the Proposals Map, as actual areas, or, if that is not possible, by symbols. This I recommend.

CHAPTER 11. RECOMMENDATION 11.

11.6.2. That Policy 99HE14 be reconsidered for the reasons given above.

11.6.3. That the sites/areas concerned in this Policy be shown on the Proposals Map.

POLICY 99HE15 UNIDENTIFIED ARCHAEOLOGICAL SITES

Objector

Objection 2051

GOSE

11.6.6. The Objection was essentially the same as that to the previous Policy - the Policy was dealing more with administrative matters than policy. I could accept that this Policy, like the last, had been prompted by the advice of the County Archaeologist and, as in that instance, a common approach throughout the County is to be supported. As in the case of the previous Policy, however, it is setting out administrative procedures more than policy. The procedures could be mentioned in the Plan, but a Policy concerned with ensuring safeguards for sites where there may be thought to be an archaeological interest, perhaps by laying a basis for the imposition of conditions on any permission, would be more appropriate. Again, I have not put forward a wording for the Policy, although Policy 3.3.3. of "Better Local Plans" would be an example.

CHAPTER 11. RECOMMENDATION 12.

11.6.4. That the Policy be reconsidered with Policy 99HE14.

POLICY 99HE16 HISTORIC PARKS AND GARDENS

Objectors

Objection 197
Objection 2044

Surrey County Council (CW)
GOSE

11.6.7. The County Council suggested a number of changes to strengthen the Policy in its encouragement of the restoration of historic gardens. Several of these seemed to have found their way into the deposited Plan. A further change to Paragraph 11.45 with the same end in view was proposed by PC123.

11.6.8. The Objection by GOSE complained of imprecise wording of the Policy, which again appeared to refer to the use of "setting" in the Policy. PPG15, paragraph 2.24, says that the effect of proposed development on a registered park or garden is a material consideration in determining a planning application. "Setting" is not defined, nor are examples given. As in Policy 99HE12, I see no reason not to refer to "setting" in the Policy, nor in this instance to consider that it needs amplification or further definition.

CHAPTER 11. RECOMMENDATION 13.

11.6.5. That PC123 be made.

POLICY 99HE17 GUILDFORD CATHEDRAL

Objector

Objection 177
Objection C181
Objection C234

Dean and Chapter of Guildford Cathedral
CPRE Surrey
Cranley Road Area Residents Association

11.6.9. Guildford Cathedral is a prominent modern building in an attractive open setting crowning a hilltop dominating the town. It is a listed building; Policy 99R5 protects the open space in its surroundings. This Policy required proposals for development in the precinct to have regard to the effect on the Cathedral and its setting.

11.6.10. The Objection of the Dean and Chapter was that the Policy was not justified and likely to prove too restrictive on the future plans for the Cathedral. The Council agreed that there were not sufficient grounds to treat the Cathedral differently from other listed buildings and that the general body of Policies in the Plan would be sufficient. The Council proposed to omit the Policy (PC124).

11.6.11. The Counter Objectors saw the Cathedral as so dominant and important to the town that a special policy was justified. I was aware that the Dean and Chapter were considering various developments that would go some way to completing the original concept for the Cathedral and its precinct, or make use of land the Cathedral was unlikely to require. This was a matter of some concern in the area and there was a view that the Policy was a safeguard for the open areas that are now a feature of the surroundings of the Cathedral. I, nevertheless, accepted the Council's view that the other Policies of the Plan were sufficient to provide adequate control over future development and that, important and unique as this site is, it is unnecessarily repetitive to include a specific Policy.

CHAPTER 11. RECOMMENDATION 14.

11.6.6. That PC124 be made (deletion of Policy 99HE17).

CHAPTER 12. NATURAL ENVIRONMENT

1. INTRODUCTION

12.1.1. The Introduction gives a brief overview of the rich and varied natural environment of the Plan area. A main aim of the Plan is its protection and enhancement. Only one Objection was recorded to this Section:-

Objector

Objection 77

English Nature (CW)

The Objector was concerned that there should be reference to the Surrey Biodiversity Initiative and the Biodiversity Action Plan and also to the Borough's Natural Areas, newly identified by English Nature. The Council agreed that these additions should be made, but to the Supporting Measures Section (PC7 and PC125). I recommend that these changes are made.

2. OBJECTIVES

Objectors

Objections 1310/11

Surrey Wildlife Trust (CW)

Objection 1673

Country Landowners Association

Objection 78

English Nature (CW)

12.2.1. The Section sets out three objectives for the Chapter. Objections related not to the principle, but to the wording of the objectives. The main issues were whether the suggested changes should be made.

12.2.2. The first objective was "To manage increased tree cover". English Nature considered this somewhat vague, at the same time suggesting a new objective - "To maintain and enhance the biodiversity within the Plan area". The Surrey Wildlife Trust thought that increased tree and plant cover should be qualified by "where appropriate". The Council proposed to remove the objective, the precise meaning of which was difficult to fully explain, substituting the proposal of English Nature (PC126).

12.2.3. In relation to the second objective, the Country Landowners Association suggested that a partnership with land managers would be encouraged if it were worded:-

"Balance the needs of sensitive development with those of nature conservation."

The Council proposed adding this as a further clause to the objective (PC126). In this wording, "sensitive" tends to give the wrong impression and my recommendation would be that it should be removed. It would, however, be useful to emphasise that this Chapter is about the identification and protection of sites of nature conservation value. I suggest an alternative wording in the recommendation.

12.2.4. The third objective related to the protection of species. CPRE Surrey suggested a change to the wording, but the Objection was subsequently withdrawn.

12.2.5. The Surrey Wildlife Trust proposed a further Policy to protect non-designated sites. This is returned to later.

CHAPTER 12. RECOMMENDATION 1.

12.2.1. That PC126 be made, except in so far as it affects Paragraph 12.6(ii), where consideration should be given to substituting:-

(ii) TO IDENTIFY SITES OF NATURE CONSERVATION VALUE AND TO BALANCE THE NEEDS FOR DEVELOPMENT WITH THEIR PROTECTION.

3. SUPPORTING MEASURES

12.3.1. Objections by English Nature referred to earlier asked for recognition of the Surrey Biodiversity Initiative, the Surrey Biodiversity Action Plan and the defined Natural Areas of the Plan area. The Council saw the addition of these references as most appropriately included among the supporting measures (PC7 and PC125). I saw no reason to disagree.

CHAPTER 12. RECOMMENDATION 2.

12.3.1. That PC7 and PC125 be made.

4. IDENTIFIED SITES AND SPECIES PROTECTION

POLICY 99NE1 CANDIDATE SPECIAL PROTECTION AREAS AND SPECIAL AREAS OF CONSERVATION

Objectors

<i>Objection 79</i>	<i>English Nature (CW)</i>
<i>Objection 342</i>	<i>GOSE</i>
<i>Objection 1428</i>	<i>Environment Agency</i>

Background, Objections and Issues

12.4.1. The Policy is concerned with nature conservation sites of International importance, in the Plan area sites designated under European Community Directives. The objection of GOSE was that the Policy was unnecessary, sites designated under the Directives also being Sites of Special Scientific Interest (SSSI), which are the subject of the following

Policy. The other objections concerned the strength of the Policy, nomenclature and procedural matters. The main issues concerned the necessity for the Policy and its wording.

Consideration

12.4.2. PPG9, Nature Conservation, the principal Government planning advice on nature conservation, indicates that local plans should identify relevant international, national and local nature conservation interests. They should ensure that the protection and enhancement of those interests is properly provided for in development and land use policies. These sites, as indicated in the Chapter, are also SSSI, and, if need be, the powers available in SSSI would be used in their protection. They have, however, a specific purposes and body of related advice. While reference might be incorporated in a policy applying to SSSI, they require the protection to be accorded them to be given in the Plan. To my mind this is reasonably done by according them a separate Policy.

12.4.3. English Nature submitted a model wording for the Policy published in Natures Place, Issue 8, February 1995. This is a rather lengthy version, but it includes the two matters on which decision makers must be satisfied before permission for development is granted given in Annex C of PPG7 - there are no alternative solutions and the development is needed for imperative reasons of overriding public interest. It can be seen that these are exceptional circumstances which do not need to be specified in the Policy. Should they arise, development would need to be supported by a convincing case and the development could be accepted under the normal powers for determining applications in special circumstances. I have not, therefore, recommend a change to the Policy, although the Council may wish to reconsider this, in view of the comparatively large parts of the Plan area which are affected by the designations and, potentially, the numbers of applications which could arise.

12.4.4. The matters of titles and procedures were accepted by the Council and proposed to be incorporated in to the title of the Policy, the Policy itself and the reasoned justification by PC126 and PC127. The reference to English Nature in Paragraph 12.7 did not quite meet that organisation's requirement and I recommend the addition of reference to the provisions of the Habitats Directorate 1994 when these changes are made.

CHAPTER 12. RECOMMENDATION 3.

12.4.1. That PC126 be made.

12.4.2. That PC127 be made, subject (in Paragraph 12.8) to the addition of:-

... THE PROVISIONS OF THE HABITAT REGULATIONS 1994
AND ...

before

... THE SPECIFIC GUIDANCE IN PPG9 ANNEX C.

POLICY 99NE2 SITES OF SPECIAL SCIENTIFIC INTEREST

Objectors

<i>Objections 80,81</i>	<i>English Nature (CW)</i>
<i>Objection 621</i>	<i>MOD (CW)</i>
<i>Objection 1312</i>	<i>Surrey Wildlife Trust (CW)</i>

Background, Objections and Issues

12.4.5. The three Objections raised somewhat different points. MOD pointed to an error in the drafting of the SSSI boundary in the vicinity of Pirbright Camp, which the Council accepted. English Nature suggested the use of their model wording, which, they suggested, would strengthen the Policy. They asked also for some changes to the detail in the list of SSSI in Appendix 5. The Surrey Wildlife Trust asked for reference to the need to consult English Nature to be added to Paragraph 12.9, which the Council also accepted. The main issues concerned the necessity to alter the Policy further.

Consideration

12.4.6. The Objectors all expressed satisfaction with the proposed changes of PC128. I considered the alternative wording of English Nature's model policy, but it appeared to me that the addition to the Policy proposed by PC128 would incorporate the key test of whether development that would affect a SSSI would be permitted. I saw no reason to change the Policy further.

CHAPTER 12. RECOMMENDATION 4.

12.4.3. That PC128 be made (including the changes to Appendix V and to the Proposals Map, Inset 7).

POLICY 99NE3 LOCAL AND NON-STATUTORY SITES

12.4.7. PPG9 lists three types of nature conservation sites which would be covered by this Policy, Local Nature Reserves (LNR) designated by local authorities under the National Parks and Countryside Act 1949, other nature reserves, often established and managed by public authorities, but also by other conservation bodies, and Sites of Importance for Nature Conservation (SINC), also usually established by public authorities for planning purposes and going by a variety of names and covering a variety of sites. The Policy makes reference to Sites of Nature Conservation Importance (SNCI) and Regionally Important Geological/Geomorphological Sites (RIGS) which I have assumed come under the general classification of SINC used by PPG9. The SNCI and RIGS are listed in Appendix 5 and shown on the Proposals Map. LNR are not mentioned in the Policy, only in Paragraph 12.11, nor shown on the Proposals Map.

12.4.8. The Objections covered a variety of matters, in some instances site specific. The Council proposed three changes to the reasoned justification in response to Objections, a number of which were conditionally withdrawn as a result. In my consideration I have generally followed the division of the Objections into groups made by the Council.

(a) General Objections

Objectors

<i>Objection 49</i>	<i>Ash Green Residents Association (CW)</i>
<i>Objection 71</i>	<i>Mr P Burge</i>
<i>Objection 196</i>	<i>Surrey County Council</i>
<i>Objection 496</i>	<i>MAFF</i>
<i>Objections 612, C17</i>	<i>MOD</i>
<i>Objection 697</i>	<i>West Clandon Parish Council</i>
<i>Objections 1314/17</i>	<i>Surrey Wildlife Trust (CW)</i>
<i>Objection 1674</i>	<i>Country Landowners Association</i>

Objections and Issues

12.4.9. The Objections variously pointed to the need for the Policy to refer to LNR, to a less rigorous protection being appropriate for sites which did not carry a statutory designation and to the Policy allowing for harmful effects to be controlled by condition or agreement rather than only refusal. Also, there was a request to include landscape features that are important to wildlife and to make reasonable allowance for the needs of agriculture, as well as some suggestions for additions and corrections. The main issues to emerge were whether further changes should be suggested to accommodate these matters.

Consideration

12.4.10. As mentioned in the Introduction, LNR are a designation with statutory backing and it could be expected that the Policy would apply. Paragraph 12.11 indicated that at the time of deposit there was only a part of an LNR in the Plan area - Hackhurst Down - although the Council has subsequently proposed two further LNR. It was agreed that reference should be made in the Policy and Paragraph 12.11 expanded, together with indication of the site on the Proposals Map. PC208 proposed the last of these changes, but did not appear to cover the first two and I refer to them in the recommendation.

12.4.11. The point that there is a hierarchy of nature conservation designations and that those designations lower in the order should carry less weight than those above them was accepted by the Council, which saw the Policies of this Section reflecting these differences. I did not see that that came across clearly in relation to this Policy, preferring to see instead of "destroy or adversely affect" a more permissive phrase looking towards the reason for designation, such as "materially harm the nature conservation interest".

12.4.12. I accepted the Council's view that the imposition of conditions or seeking to negotiate planning obligations are powers available in dealing with all planning applications,

and encouraged by advice where they might be an acceptable alternative to refusing permission. This facility is expressly mentioned in PPG9, however, and in so far as nature conservation is concerned there are specific circumstances where a condition or obligation could be significant. Examples are to protect a site, or part of a site, or to secure replacement of features of value. I do not see a need to add this to the Policy, but it could prove a useful addition in implementing the Policy and I suggest adding it to the reasoned justification.

12.4.13. Surrey County Council asked for recognition that there were landscape features of value to wildlife which were not designated. The Council proposed the addition of a further Policy to cover this interest (PC126) considered later in the Chapter.

12.4.14. MAFF requested that the reasonable needs of agriculture be taken into account in the implementation of the Policy. I accepted the Council's view that agricultural development, where it needs planning permission, should be subject to the same controls as other development. The suggestions I make in relation to this Policy may, however, make it appear less rigid and more accommodating to development for agricultural purposes.

12.4.15. The other Objections considered here raised points of correction, for example, to the name of the Earl of Onslow Pit, and addition of reference to further SINC in Appendix 5 and to the Surrey Biodiversity Action Plan. The last is added to Paragraph 12.7 (PC7). The first two were proposed as part of PC130. Mr Burge noticed that whole of Ridings Wood (No.399) was shown on the Proposals Map, but it was not recorded in the list in Appendix 5. This omission, I suggest, is corrected.

(b) Objections by Loseley, Albury and Northumberland Estates

Objection 1533

Loseley Estate

Objection 1747

Albury Estate (CW)

Objection C8

Northumberland Estate (CW)

12.4.16. The Objections raised a matter also raised above, the restrictive nature of the Policy and the absence of reference to the possibility of mitigating harm. I have suggested that the wording of the Policy should be made less uncompromising and should allow for the mitigation of harm, as well as referring to the use of conditions or planning agreements in this respect. I have noted Structure Plan Policy PE8, and my suggestions appear to be in tune with that Policy, as well as with the advice.

12.4.17. A further point raised in Structure Plan Policy PE8, and in the advice, is the enhancement of the ecological value of sites. This would seem likely to be principally a matter of management, and is referred to in Paragraph 12.7 (iv) in the context of the Biodiversity Action Plan. A Policy would not seem appropriate, unless it could be related to specific sites and actions.

12.4.18. The Albury Estate with the Northumberland Estate questioned the boundary of the Blackheath and Broomfields SNCI (No.388). This was proposed to be extended following representations by the Surrey Wildlife Trust (Objection 1328) (PC216).

Subsequently, it was agreed that this change should not be made and a slightly smaller area than that shown on the Proposals Map was appropriate.

(c) SNCI boundaries in Holmbury St Mary

Objection 1833

Mr R J Smith

12.4.19. The adopted local plan identifies sites of High Ecological Quality (AHEQ), which in the Plan have been replaced by SNCI. Mr Smith noted differences in Holmbury St Mary between the boundaries drawn in the adopted plan and the Plan. In particular, the Hurtwood had been extended and the Churchyard omitted. The Churchyard having an ecological interest and managed with this in mind it was felt that inclusion would be encouraging as well as appropriate. The point was made that the village is often seen to be continuously developed, and had been treated that way in drawing the SNCI boundaries, but was in reality a series of detached enclosures, the common land between them forming valuable corridors for wildlife. It was asked that these be included, along with land in Felday Glade between the last house and the Womens Institute Hall.

12.4.20. The Council commented that the SNCI boundaries were the result of more recent surveys which had found some boundaries of the AHEQ inaccurate. The Churchyard had not been surveyed as a part of this project, but had now been found to be appropriate for inclusion in the SNCI. The land in Felday Close, not part of the AHEQ, had also been surveyed but had been considered of insufficient nature conservation interest. The common land between the different parts of the village, also excluded from the AHEQ, had not apparently been surveyed and no assessment made of its eligibility. The proposed new Policy (99NE6) would safeguard this land until such time as a survey were made, and could continue to do so, whether or not they were found appropriate for inclusion.

12.4.21. It appeared to me that the approach to the identification of SNCI had been thorough and professional, but was necessarily on-going. The Structure Plan Policy mentions the importance of wildlife corridors, as does Mr Smith, and I assumed that the Plan was taking these into account in defining SNCI, or, failing that, they could, if of sufficient importance, be protected through the proposed new Policy. Having regard to the character, and the Green Belt policies applicable to Holmbury St Mary, it did not, however, appear that these open areas were at significant risk from development.

(d) Objections by the Council for the Protection of Rural England

Objection 461

CPRE Waverley

Objections 1919/20

CPRE Surrey

12.4.22. The Objections saw some sites of nature conservation value to be omitted from the Plan and expressed particular concern that there should be a policy to protect the ridge and escarpment between Compton and Godalming.

12.4.23. The initial concern appeared to be that certain of the designated AHEQ sites of the adopted plan had not been carried forward into the Plan. The reasons for that were

explained above. A resurvey of sites of potential nature conservation interest had shown some to be no longer of such value that they should be included, while some new sites were proposed. Without being properly qualified myself to check that the results were correct, the procedures and the professionalism of those undertaking the task satisfied me that, while the task was necessarily ongoing, the results in the Plan were properly justified.

12.4.24. The ridge between Compton and Godalming is a significant landscape feature and it is included in the AONB and AGLV designations. These would be important in retaining its openness and its natural beauty. The surveys did not indicate a value to nature conservation that justified its specific identification, and, as I have said above, I have seen no reason other than to endorse those findings. That the area is not designated is not an indication that it is without value to wildlife or worthy of conservation and the new Policy put forward by the Council would allow the nature conservation value of other sites to be taken into account were development proposed.

12.4.25. The Objector mentioned that a specific policy was proposed in the Waverley Local Plan, the feature crossing the respective plan boundaries. The Council would need to have regard to this, but, with the AONB and AGLV designations relating to the area, I saw no need to apply a further Policy to the feature.

(e) Objection by Merrist Wood College

Objection 1420 Merrist Wood College

12.4.26. The Objectors were concerned that the wording of the Policy allowed "indirect" effects to be taken into account in considering harm to nature conservation sites. This was considered too vague.

12.4.27. The Structure Plan Policy PE8 is expressed to control development in or affecting nature conservation sites. In doing so it is following PPG9 and I do not see it as unreasonable for this Policy to take into account the effects of development outside a designated site if, in some way, it will affect the nature conservation value of that site. I have commented earlier that the hierarchy of Policies, following that of the significance of the sites designated, should be graded in their attitudes to development and that there should be regard to the possibilities of mitigation and to the use of conditions and planning agreements. I do not see that the reference to indirect effects should be changed.

(f) SNCI No.318, Crack Processing Mills, Send

Objector

Objection 564 Wey Estates

12.4.28. The Mills are located on the south eastern bank of the River Wey Navigation, the designated SNCI (No.318) being a narrow strip of land between the Navigation and the Broadmead Cut to the north west. The Objection was that being within an industrial curtilage, the land should not be designated.

12.4.29. It was indicated by Surrey Wildlife Trust that the site had been seen to qualify for designation because it was a complex wetland site, its particular value being its reedbeds. As it is at present, I saw no reason to question its nature conservation value. That it is part of an industrial curtilage I saw as no bar to that, noting also that the site was in the Green Belt which would be a general restraint on the extension of significant development to this area.

12.4.30. The Green Belt issue notwithstanding, the Policy would not in the form I suggest debar development, if the nature conservation interest can be protected. I do not consider that the designation of this land should be removed.

- (g) Land south of Ash Green Lane West, Tongham (Ash Green Meadows, SNCI No.52)

Objectors

Objection 643
Objection C43

Laing Homes
Ash Green Residents Association

12.4.31. The first Objection related to fields forming the greater part of a triangular area to the south of Ash Green Lane West, between the Lane and the former railway. The land, in addition, contains an allotment site and a nursery. The Objectors pointed out that the survey on behalf of the Council as well as an independent survey for the Objectors had shown the nature conservation interest of the land to be low. The Council proposed the removal of this part of the SNCI in PC130.

12.4.32. The Counter Objection by Ash Green Residents Association opposed removal of this land from the SNCI, considering the nature conservation value of the land, and of the adjoining former railway, justified its protection. On the basis of the surveys, I saw no reason to question the Council's proposed change. I noted that the Objectors were concerned that removal of the nature conservation designation could open the land for development. This was the subject of an Objection considered in Chapter 10.

CHAPTER 12. RECOMMENDATION 5.

12.4.4. That PC130 be made.

12.4.5. That in Policy 99NE3 be added before "SITES OF NATURE CONSERVATION IMPORTANCE", "LOCAL NATURE RESERVES".

12.4.6. That in Policy 99NE3 be omitted "... DESTROY OR ADVERSELY AFFECT ..." and replaced with

... MATERIALLY HARM THE NATURE CONSERVATION INTEREST ...

12.4.7. That to Paragraph 12.11 be added as the second sentence:-

THE COUNCIL IS CONSIDERING DESIGNATING (OR HAS DESIGNATED) TWO FURTHER LOCAL NATURE RESERVES AT RIVERSIDE PARK, GUILDFORD AND LAKESIDE PARK, ASH VALE.

12.4.8. That a new Paragraph be added to the reasoned justification:-

WHERE DEVELOPMENT IS PROPOSED AFFECTING DESIGNATED SITES THE COUNCIL WILL TAKE INTO ACCOUNT WHETHER ANY HARMFUL EFFECTS TO THE NATURE CONSERVATION INTEREST OF THE SITE CAN BE SATISFACTORILY OVERCOME BY THE IMPOSITION OF APPROPRIATE CONDITIONS, ENTERING INTO PLANNING AGREEMENTS OR OTHER MEANS, INCLUDING THE PROVISION OF A REPLACEMENT HABITAT.

12.4.9. That PC216 concerning the Blackheath/Broomfields SNCI (No.388) be NOT made but the boundaries be changed as indicated in the letter from the Surrey Wildlife Trust dated 19 June 2000.

12.4.10. That the Proposals Map (Inset 14) be changed by the addition of St Mary's Churchyard, Holmbury St Mary, as an SNCI.

12.4.11. That SNCI No.399 (Ridings Wood) be added to the list of SNCI in Appendix V.

POLICY 99NE4 SPECIES PROTECTION

Objectors

Objection 82

English Nature (CW)

Objection 123

Blackwater Valley Friends of the Earth

Objection 2071

GOSE

Background, Objections and Issues

12.4.33. PPG9 indicates that it is a material consideration in relation to a proposal for development whether there would be harm to a protected species or its habitat. Conditions may be imposed or planning obligations entered into to secure protection. English Nature suggested a revised form of words for the Policy. GOSE was concerned that it might be trespassing on the fields of other legislation. The Blackwater Valley Friends of the Earth expressed caution as to the use of conditions to safeguard wildlife, their experience suggesting that they were not always effective. The main issues were whether the Policy was appropriate to its objectives.

Consideration

12.4.34. As noted above, the advice is clear as to what is expected of the Plan. The prime source of protection for the designated species lies in other legislation, but as a material consideration in the consideration of planning applications there is a necessity for a formal basis for this to be set out in the Plan. The wording proposed for the Policy follows closely the advice of "Better Local Plans" and with some changes to the reasoned justification the Objection of English Nature was satisfied. The concerns of the Blackwater Valley Friends of the Earth can be appreciated. PPG9 indicates that English Nature should be consulted on applications and it can be assumed that the best advice will be available, if the route of conditions or obligations is considered appropriate in any particular case.

12.4.35. Various changes were proposed by the Council, including correction of the Policy number (PC187) and changes to the reasoned justification (PC131). I was uncertain as to the precise point GOSE was making in its Objection, considering the Policy to be in line with the advice, but saw the proposed changes as improving the reasoned justification.

CHAPTER 12. RECOMMENDATION 6.

12.4.12. That PC187 be made.

12.4.13. That PC131 be made.

5. TREES AND WOODLAND

POLICY 99NES DEVELOPMENT AFFECTING TREES, HEDGES AND WOODLANDS

Objectors

Objection 196

Objections 1318/19

Objection 2052

Surrey County Council

Surrey Wildlife Trust (CW)

GOSE

Background, Objections and Issues

12.5.1. The Policy affects only trees that are subject to a Tree Preservation Order and/or are in a Conservation Area. Surrey County Council raised concerns about the reference made to LNRs in this Chapter of the Plan and the protection of landscape features of importance to wildlife, met in relation to other Policies. Surrey Wildlife Trust asked for reference to important hedgerows, as defined in the Hedgerow Regulations, 1997, and the protection of ancient woodland. They also sought involvement in the preparation of Supplementary Planning Guidance, referred to in Paragraph 12.17, although the Council having prepared Guidance, proposed to remove this Paragraph (PC133). GOSE raised their concern that statements describing administrative matters were included. The main issues concerned the appropriateness of the Policy to the Plan.

Consideration

12.5.2. The concerns that this and Policies of the previous Section were not meeting all needs to safeguard features of significant nature conservation interest was met by the proposal to add a further Policy to the Chapter. The somewhat limited scope of this Policy, and an apparent repetition of control available under the Tree Preservation and Conservation powers, is justified by a general need to consider the value of trees in the landscape or townscape and for replacement or alternative planting when development is proposed. A resume of the features of the control and of the Council's requirements is in these circumstances not strictly necessary, although, I consider, usefully contained in the reasoned justification.

12.5.3. I saw no objection to the phrasing of the Policy, which followed that of Policy 3.5.3 of "Better Local Plans". The removal of Paragraph 12.17 is appropriate, although consideration should be given as to whether a reference to the guidance now available would be helpful.

CHAPTER 12. RECOMMENDATION 7.

12.5.1. That PC133 be made, but that consideration be given to including in the place of Paragraph 12.17 reference to the available Supplementary Planning Guidance.

6. NEW POLICY

POLICY 99NE6 UNDESIGNATED FEATURES OF NATURE CONSERVATION INTEREST

Objectors

<i>Objection 78</i>	<i>English Nature</i>
<i>Objection 196</i>	<i>Surrey County Council</i>
<i>Objections 1310/1, 1318</i>	<i>Surrey Wildlife Trust</i>
<i>Objection 1673</i>	<i>Country Landowners Association</i>
<i>Objection 1909</i>	<i>CPRE Surrey</i>

Background and Objections

12.6.1. The new Policy was proposed in response to Objections from Surrey County Council, Surrey Wildlife Trust and others (PC126, PC132). It would permit the nature conservation interest of sites, other than those covered by a formal designation, to be taken into account if an application for development were made.

12.6.2. The Objection acknowledged that PPG9 encouraged conservation and, where necessary, resistance to development, or the use of conditions and obligations where appropriate, but directed to features of major importance, likely for the most part to have been identified in the survey process and the sites, therefore, designated. Taking in other sites, the Policy as expressed was too wide and undifferentiated in its application, potentially requiring an ecological survey on most application sites, to establish whether they have any features of significance. The Policy would occasion delay and raised the possibility of refusal or limitations on development for reasons not clear from the Plan. The danger of creating uncertainty and delay from the injudicious use of nature conservation policies was expressly warned against in the advice.

12.6.3. The Objector also pointed to uncertainty arising from the reasoned justification of the proposed Policy. It was not clear what was meant by "land users". Whether these were existing or future, or included unauthorised recreational use, was not clear. As a matter of significance, further explanation was required.

12.6.4. The main issues were whether this Policy was appropriate to the Plan or required changes.

Consideration

12.6.5. The proposed Policy arose from various concerns relating to the role of the Plan in delivering the Surrey Biodiversity Action Plan and to the lack of protection for features of nature conservation interest that are recognised, although often not within the designated areas. There was also note that the advice encouraged the protection of features of nature conservation significance, such as ponds, watercourses and small woodlands. Wildlife corridors were also seen as important.

12.6.6. The advice of PPG9 refers to features of significance to wildlife occurring widely outside the specifically designated sites and says that where there are nature conservation interests they should be treated as a material consideration. A Policy that would allow these features to be taken into account in the consideration of applications is to my mind appropriate for the Plan. I would, nevertheless, see it as primarily to safeguard features that may not come to light until development comes forward. Ancient woodlands I assume have already been identified and those of importance are included in one of the designations. There are also powers relating to hedgerows, which it could prove useful to have mentioned, perhaps in Policy 99NE5. The features to be protected by this Policy should be significant enough to warrant consideration, but allow a reasonable flexibility in relation to the relative importance of the development, the actual harm development would cause and the opportunities for reducing harm through measures of amelioration or relocation. The Policy should not extend to recreational or amenity considerations, per se.

12.6.7. I consider that a small changes should be made to the Policy and to the reasoned justification proposed by PC126. These are incorporated in the recommendation.

CHAPTER 12. RECOMMENDATION 8.

12.6.8. That the new Policy proposed by PC126/PC132 be incorporated into the Plan in the following form:-

POLICY 99NE6

UNDESIGNATED FEATURES OF NATURE CONSERVATION INTEREST

IN CONSIDERING PROPOSALS FOR DEVELOPMENT ON UNDESIGNATED SITES WHERE THERE IS FOUND TO BE A SIGNIFICANT WILDLIFE INTEREST, THE COUNCIL WILL SEEK TO PRESERVE AND ENHANCE THE FEATURES OF ECOLOGICAL VALUE.

Reasoned justification

12.00. THERE ARE MANY SITES AND FEATURES WITHIN THE BOROUGH WHICH ARE OF IMPORTANCE TO THE CONSERVATION OF THE AREA'S WILDLIFE BUT ARE NOT DESIGNATED FOR THEIR NATURE CONSERVATION VALUE. THEY INCLUDE PONDS, DITCHES, HEDGEROWS, WOODS AND GROUPS OF TREES WHICH MAY NOT CONTAIN RARE SPECIES, BUT PROVIDE REFUGES AND SOMETIMES WILDLIFE CORRIDORS, PARTICULARLY WITHIN THE URBAN AREAS. WHERE DEVELOPMENT IS PROPOSED ON SITES WHERE THESE FEATURES ARE TO BE FOUND, THE COUNCIL WILL SEEK TO PRESERVE AND WHERE POSSIBLE ENHANCE THE FEATURES OF MOST VALUE, PERMITTING DEVELOPMENT WHERE THE NATURE CONSERVATION INTEREST IS NOT HARMED, OR WHERE BY SPECIFIC MEASURES OR BY MANAGEMENT ANY HARM COULD BE MINIMISED. THE SURREY WILDLIFE TRUST WILL BE CONSULTED IN SUCH CASES.

CHAPTER 13. RECREATION

1. INTRODUCTION

13.1.1. The Section outlines the expected increase in demand for recreation and leisure activities over the Plan period, the result of increased mobility, peoples growing interest in health and fitness and the greater amounts of leisure time enjoyed by many people. The Plan area is well endowed with facilities in wide variety. Many come within the Council's responsibilities, but the private sector is also heavily involved. The main aim of the Plan is to support the provision of high quality recreational, tourist and community facilities.

13.1.2. The Chapter contains Policies directed to this aim. In support, it pursues the general advice that, in particular, existing recreational land, public and private, should be retained and the objective of Structure Plan Policy PE11 to protect open land in urban areas and rural settlements, not only land that is in recreational use, but land that contributes to the character, environment or amenity of the surrounding area, or is of high ecological value. One need of this Policy is to identify the areas of open land to be protected, which is done by Policy 99T3. Much of the background and support for the Chapter was provided in the Open Space Topic Paper (CD18).

13.1.3. A number of matters arose in relation to individual Policies which have a bearing on the content of the Introduction. There was only one Objection directly attributable to this opening Section, although there was one further Objection difficult to fit elsewhere, which for that reason is considered here.

(a) Objection by the Guildford Society

Objection 874

The Guildford Society (CW)

13.1.4. The Society asked that in view of its importance in the provision of recreational facilities, as well as the public and private sectors, the community and charitable sectors also receive mention. The Council proposed this addition to the last sentence of Paragraph 13.4 (PC134).

(b) Objection by Ash Parish Council

Objection 1251

Ash Parish Council

13.1.5. The Parish Council asked, as a general comment, that the concept of a country park at Ash Lodge Meadows be highlighted and pursued as a means of preventing the coalescence of Ash, Ash Green and Tongham.

13.1.6. This was essentially a matter for the Council. No proposals were brought forward into the Plan in this respect. The area concerned is, however, protected from development by the Countryside Beyond the Green Belt designation (Policy 99RE4). I have not accepted that there is a need to take any of this land for development in the Plan period,

although there were Objections which related to some of its parts. I have not considered that I need to make any recommendation in respect of providing further protection for this land.

13.1.7. The Objection also pointed to the need for more facilities for sports in Ash, seeing Ash Lodge Meadows as a potential site. Need was seen for facilities for "modern sports", such as street hockey and outdoor basketball. Also opportunities for family oriented activities, such as nature trails, were advocated. I had no doubt that the Council would, if it had not already, taken into account the changing patterns of the use of recreational land. The Policies of this Chapter are directed to improving provision and to protecting what exists. Only in general terms should the Plan be concerned with the provision for individual activities where all they need is the availability of sufficient space and provision of the necessary equipment. Whether what was available was marketed sufficiently well I was in no position to judge.

CHAPTER 13. RECOMMENDATION 1.

13.1.1. That PC134 be made.

2. OBJECTIVES

Objector

Objection 1675

Country Landowners Association

13.2.1. The Objector was supportive of Objectives (ii) and (iii), respectively, to resist the loss of existing recreational facilities and encouraging the more efficient use of facilities. Their concern was that the organisation had been working with landowners and user groups to promote voluntary access agreements, which they felt could be jeopardised if the statutory right to roam is introduced. A need was seen for support and funding, if the voluntary access arrangement were to be maintained and extended during the introductory period of the new legislative system.

13.2.2. I could sympathise with the problem, the voluntary access schemes having been a major addition to the recreational and leisure facilities in the countryside. While the Council might be willing to consider what help might be given, it was not a matter that would be a reasonable subject for policies of the Plan, the more general policies dealing with footpaths, etc., covering the land use matters adequately.

3. SUPPORTING MEASURES

Objector

Objection 97

Guildford Group Ramblers Association (CW)

13.3.1. The Association suggested the addition of a further supporting measure:-

"(viii) to work with Surrey County Council to create new footpaths, definitive and permissive, to link existing paths and fill gaps".

It was pointed out that there were places where the addition of a relatively short length of new footpath would encourage the greater use of longer routes. The Council accepted the suggestion, proposing the addition in PC135.

CHAPTER 13. RECOMMENDATION 2.

13.3.1. That PC135 be made.

4. LOSS OF RECREATIONAL LAND AND BUILDINGS

POLICY 99R1 LOSS OF RECREATIONAL LAND AND BUILDINGS

Objectors

Objection 523
Objection 1480
Objection C193

Guildford Diocesan Board of Finance (CW)
Mr R Stephens (CW)
CPRE Surrey

13.4.1. The Policy seeks the retention of recreational land and buildings, the Policy referring to "buildings used for recreation purposes or with potential for recreation uses". As mentioned earlier, the reasonable protection of existing recreational land, public and private, is a tenet of Government policy and a Policy on these lines is appropriate for the Plan.

13.4.2. The Diocesan Board of Finance Objected that the Policy did not follow the advice of PPG17, Sport and Recreation, paragraph 42, in the context of the loss of playing fields, setting out circumstances in which they might be developed. The Council accepted this and proposed the addition of two further circumstances to the Policy based on the PPG (PC136). CPRE objected that in this proposed change the requirement that suitable alternative should be provided was made, but no longer that it should be "nearby". The Council accepted that the omission was an oversight.

13.4.3. Mr Stephens was concerned that the Policy should be clear in including allotments. There is no "official" definition of recreational land and the definition given for open space in the 1990 Act is accepted as too limited for the application of PPG17. Allotments are not specifically mentioned at either place, but, if in origins their purpose was not wholly recreational, they are open spaces that fall within the definition of land for sport, outdoor recreation or of amenity or structural value as normally understood and in general would be expected to be protected, although under Policy 99R5, perhaps, rather than this Policy. The proposed changes would meet the Objections.

CHAPTER 13. RECOMMENDATION 3.

13.4.1. That PC136 be made (with the addition of "NEARBY" to Criterion 1).

5. OPEN SPACE PROVISION

POLICY 99R2 RECREATIONAL OPEN SPACE PROVISION IN
RELATION TO LARGE NEW RESIDENTIAL
DEVELOPMENTS

Objectors

<i>Objection 243</i>	<i>Cranley Road Residents Association (CW)</i>
<i>Objection 1228</i>	<i>McCarthy and Stone (Developments) Ltd (CW)</i>
<i>Objection 1616</i>	<i>Councillor Mrs J Cassar</i>

Background, Objections and Issues

13.5.1. This Policy and the one following make the requirement that all new residential developments for 5 or more dwellings will make provision towards recreational open space. Developments for 25 or more dwellings will be expected to make provision on site; those of between 5 and 25 dwellings on site, or in the form of financial contributions to the provision or improvement of open spaces elsewhere.

13.5.2. The Objections to this Policy raised the question of the distinction between land provided for recreational use and for visual effect, the necessity for a provision in accordance with the Policy in specialist developments, such as those for the elderly, and a need to make provision in the Plan to ensure the maintenance of open space, the condition of land at Kings Avenue being given as an example.

13.5.3. The reasoned justification said very little about the background or implementation of the Policy and in my view the main issues were not simply those raised by the Objectors, but whether the Policy was adequately justified and supported.

Consideration

13.5.4. PPG3, paragraph 53, says that "local planning authorities should have clear policies for the protection and creation of open space and playing fields, and new housing developments should incorporate sufficient provision where such spaces are not already adequately provided within easy access of the new housing." That advice is often applied in Policies such as this, and it was noticeable that none of the Objections concerned the principle of the Policy.

13.5.5. The Open Space Topic Paper (CD18) was helpful in its explanation of the background to the Policy. However, the Plan could usefully contain some elements of this background. In particular, in the first instance, I see it as important that the Plan should

contain a justification of the standards given. The National Playing Fields Association's minimum standards recommended for the provision of outdoor playing space are commonly used, being quoted in PPG17 and having the authority of a national body. National standards are not, however, prescribed, it being up to planning authorities to justify the amount and location of new provision.

13.5.6. The extent to which particular standards are applicable, and whether to the whole of the Plan area, are matters for the Council's judgement, but do need to be capable of justification in relation to the Plan area, the more so because the provision to be expected from developments will be likely to be the subject of planning obligations and must be shown to be appropriate and reasonable. In addition to the 2.4ha per 1000 population, the Council included 0.4ha of "amenity space". The basis is laid for its inclusion in the NPFA advice, but this may need justification when it is considered that in much of the Plan area there is ready access to the countryside. "Amenity space" is easily confused with landscaping and might be more accurately referred to as "informal open space", meaning land set aside for casual recreation, even if it may also have an amenity purpose.

13.5.7. In the second instance, while the Topic Paper makes it clear that an inventory of the open space available in the Plan area has shown that in all but one Ward provision is below the adopted standards, that is not said in the Plan. It appeared that the information was only available on a Ward basis, but it would be sufficient to say that in all but one of the Wards of the Plan area the standards were not currently met and that it would be important not to allow the situation to significantly worsen as a result of new development.

13.5.8. The third matter concerned the Council's approach to meeting deficiencies. This was perhaps less of concern in relation to this Policy than to the next. The provision sought in this Policy is to be on site and on only the Queen Elizabeth Barracks/Chart Depot site is anything greater than childrens play space and land for informal recreation likely to be sought. Nevertheless, while the fifth Objective is to overcome identified deficiencies in open space and other recreational provision, there are no proposals for new open spaces in the Plan, other than would occur on the allocated housing sites. Those being asked to provide open space up to the standards for their developments could expect that this is part of a wider strategy, over a period of time, to bring the area as a whole up to the standards. If that is not to be the case, because it may be financially not possible or physically impractical, this casts a doubt on the level of the standards adopted.

13.5.9. It follows from this that I consider that the reasoned justification for the Policy should be given further thought. Certainly the three matters referred to above should be covered, if briefly and by reference to other documents. Having regard to the Objections, that with most bearing on the Policy was that of McCarthy and Stone (Developments) Ltd. A Policy such as this has a need for flexibility in relation to both the nature of the development and the local situation. The suggested change in PC137 can be seen to meet the first. The second criterion of the following Policy could be adapted to provide the second. A suggestion is in the recommendation.

13.5.10. The Objection by the Residents Association suggested that the Supplementary Planning Guidance mentioned in Paragraph 13.12 should distinguish between recreational

open space and open land left for visual effect. I have suggested a change in the wording of the Policy that would help in that respect. It was also asked that recreational provision should not be sited where activities connected with it could be detrimental to the amenity of residents. I was given no clear indications to what the proposed Supplementary Planning Guidance would contain: I assumed it would be concerned mainly with matters of siting and design, in which matters such as these would be dealt with.

13.5.11. The Council responded to the complaint as to the condition of the land at Kings Avenue by referring it to the Leisure Services Department. In so far as this Policy is concerned, Paragraph 13.11 indicates that the Council would normally adopt areas of open space provided for public use and would be responsible for their maintenance. There is mention that commuted payments will be required for future maintenance. The advice of Circular 1/97, particularly paragraph B14, needs to be borne in mind, the implication of which is that while payment for the future maintenance of open spaces principally for the benefit of the development itself may be sought, maintenance of provision for the wider use of the public should fall on the Council if it is to acquire the land. The way that Paragraph 13.11 is worded suggests that the land to be adopted would be disqualified by this advice.

Conclusions

13.5.12. In my view this Policy is an acceptable part of the Plan, but further thought should be given to the reasoned justification to ensure that it adequately supports and explains the Policy. The Policy, itself would benefit from an added flexibility, to take account of the needs of the development and the local situation of the site.

CHAPTER 13. RECOMMENDATION 4.

13.5.1. That the reasoned justification of Policy 99R2 be redrafted to include:-

1. A justification of the standards for the provision of open space adopted;
2. An explanation of the relationship between the existing provision and the standards; and
3. an account of the Council's strategy for meeting overall and local deficiencies.

13.5.2. That in place of PPC137 the following addition be made to Policy 99R2:-

WHERE THE PROVISION OF OPEN SPACE IN THE WARD IS, AND WILL REMAIN AFTER THE DEVELOPMENT, ADEQUATE BY THESE STANDARDS EITHER NO REQUIREMENT OR A REDUCED REQUIREMENT MAY BE MADE UNDER THIS POLICY. WHERE THE TYPE OF DWELLINGS PROPOSED DOES NOT GENERATE A NEED FOR FORMAL PLAY SPACE, SUCH AS SHELTERED ACCOMMODATION FOR THE

ELDERLY, THE PROVISION REQUIRED WILL BE FOR INFORMAL OPEN SPACE ONLY.

POLICY 99R3 RECREATIONAL OPEN SPACE PROVISION IN
RELATION TO NEW SMALL RESIDENTIAL
DEVELOPMENTS

Objectors

<i>Objection 397</i>	<i>British Telecommunications Plc (CW)</i>
<i>Objection 1209</i>	<i>HBF</i>
<i>Objection 1253</i>	<i>Ash Parish Council</i>

Background, Objections and Issues

13.5.13. The Policy required a provision for recreational open space in respect of developments of between 5 and 25 dwellings, seeking either a provision on site in accordance with the standards set down in the previous Policy, or a contribution in lieu, unless the provision in the Ward was already sufficient against the standards.

13.5.14. The Objection of British Telecommunications Plc saw the addition of an alternative to the range of dwellings of "sites of less than 0.4ha" as confusing, potentially including all residential development, even a single house in the scope of the Policy. The Council accepted that that was not the intention and proposed removing this phrase (PC137).

13.5.15. The Objection of Ash Parish Council concerned the maintenance of open spaces once provided. The Council saw the same arrangements applying as outlined in Paragraph 13.11, although in that respect I voice the same caution. As written, I do not consider that Paragraph complies with the advice of Circular 1/97.

13.5.16. The Objection of the HBF was also concerned with the conformity of the Policy with Circular 1/97, in this instance with the indication given in Paragraphs 13.15 and 13.16 that contributions would go into a general fund for the improvement, expansion or upgrading of existing facilities or the provision of new facilities. Some of the items mentioned would appear to have nothing to do with the provision of additional open space and could not be squared with the advice.

13.5.17. As in the case of the previous Policy, the Policy raised questions as to its justification and its relationship with the advice and these I saw to be the main issues to be considered.

Consideration

13.5.18. If the matters I referred to in relation to the reasoned justification of the previous Policy are included in the Plan there would be no need to repeat them in relation to this Policy. The Council accepted the point made about the conformity of the Policy with

the advice of Circular 1/97, at least in so far as the implications of parts of the reasoned justification were concerned, and proposed the addition of a further paragraph (PC138). I consider, however, that this new Paragraph should be in substitution for Paragraph 13.15 and not in addition.

CHAPTER 13. RECOMMENDATION 5.

- 13.5.3. That PC138 be made.
- 13.5.4. That PC186 be made (correction of printing error).
- 13.5.5. That PC138 be made.
- 13.5.6. That Paragraph 13.15 be omitted.

POLICY 99R4 RECREATIONAL OPEN SPACE PROVISION IN
RELATION TO NEW COMMERCIAL DEVELOPMENTS

13.5.19. There were no Objections recorded to this Policy.

POLICY 99R5 PROTECTION OF OPEN SPACE

13.5.20. This Policy set out to protect open space, the spaces of more than 0.4ha intended to be protected being identified on the Proposals Map. The Objections fell into two groups, those to the Policy itself and those to sites defined under the Policy. The first group is considered as a whole, including general points made by the second group of Objections. The second group is considered in relation to the individual sites concerned.

(a) Objections to the Policy or reasoned justification

Objectors

<i>Objection 118</i>	<i>Mr R Shrimplin</i>
<i>Objection 175</i>	<i>Dean and Chapter of Guildford Cathedral</i>
<i>Objections 195, C24</i>	<i>Surrey County Council</i>
<i>Objections 343, 2042</i>	<i>GOSE (CW)</i>
<i>Objections 1320/1, 1324</i>	<i>Surrey Wildlife Trust</i>
<i>Objections 1483-5</i>	<i>Royal Grammar School</i>
<i>Objections 1487-9</i>	<i>The Governors of Tormead School</i>
<i>Objections 1490-2</i>	<i>The Governors of the Royal Grammar School</i>
<i>Objections 1503-4</i>	<i>The Church Schools Foundation Ltd</i>
<i>Objection 1676</i>	<i>Country Landowners Association</i>

Background, Objections and Issues

13.5.21. PPG3 advises that local planning authorities should have clear policies for the protection of open space and playing fields. PPG17 refers to the protection of open space and other land with recreational or amenity value. Structure Plan Policy PE11 makes the requirement to protect open spaces within urban areas and rural settlements. In the Plan there are three Policies which have a bearing on the protection of open land, Policy 99G2(10), Policy 99R1 and this Policy.

13.5.22. Objectors were concerned that the Policy was not following the Structure Plan, which divided open land into "Strategic" and "Other", in so far as no "strategic" open land was identified, nor allowed for in the Policy. That there appeared to be two similar or overlapping Policies was a concern. There were also points made as to the precision of the Policy, including the definition of open space, one reading of the Policy allowing it to include rural land, and its restrictiveness or lack of flexibility, not least in its relation to school land. It was considered that it should recognise the contribution of open space to wildlife by providing corridors and habitats.

13.5.23. The Council proposed one change to the Policy (PC139), in response to GOSE, to improve its precision, although subsequently suggesting further changes. Four changes were proposed to the reasoned justification in response to points made by Objectors (PC139, PC230). The main issues outstanding were the relationship of the two Policies and whether this Policy was reasonably expressed and supported to achieve its objective of protecting open land.

Consideration

- (i) The role of this and other open land Policies.

13.5.24 I have regarded this Policy as the most significant of the open land protection Policies, because under this Policy the land to be protected, or at least the larger parcels, is specifically identified. PC139 includes a definition of open space for the purposes of the Plan as "all types of open land, both public and private, of public recreational and/or amenity value". This definition follows the gist of PPG17, which talks of "all types of open space of public value" and I saw this to be both reasonable and a useful addition to the Plan.

13.5.25. Policy 99G2(10) forms part of the suite of design Policies. Much of the open land it would concern may well be defined under this Policy, but it is likely also that much would not. Concerned with townscape and the setting of development, it would bring into the equation different consideration to simple recreational or amenity value to the public at large.

13.5.26. Policy 99T1 superficially covers some of the same ground. The Policy is directed to "recreational land and buildings". The first would be likely to be also covered by this Policy, by which I imagine the land to which it relates would be defined. The significant difference is a positive as against a negative form of wording, but the intention appears the same. The reference to recreational buildings would provide a means of control

over these, but the examples given in Paragraph 13.4 suggest that the Council sees it relating to buildings that are "recreational" in the broadest sense and either have no need of protection, being in public or quasi-public control, or are protected by other Policies, such as Policy 99T2 and Policy 99CF2. I can see the value of a Policy which will protect the more formal recreational land and facilities, and this is also a part of National policy. My suggestion is that it could be less confusing if Policy 99R1 were directed to "Loss of land and facilities for sport and physical recreation".

(ii) The definition of open land

13.5.27. The Structure Plan asked for the identification and protection of strategic open land within urban areas and rural settlements. The most important areas are described as including common land and large open areas to which the public has access. The Plan does not mention strategic land and it was explained that open land that might be "strategic" in defining communities or the structure of urban areas in the Plan area was for the most part outside settlements rather than within and protected from development by the Green Belt or Countryside Beyond the Green Belt Policies.

13.5.28. I could accept that this might well be the case, but as this Policy of the Plan was derived from the Structure Plan Policy, the concept of strategic land should be kept. It should, perhaps, have been an additional criterion in the analysis of CD18. In the Plan, a useful addition would be an explanation that where land is contributing to the character and amenity of areas by defining the separate identity of communities and the structure of the urban area this will be seen as an added reason for its protection.

13.5.29. The Proposals Map shows the larger areas of land intended to be protected by the Policy. These I noted had been identified by survey and were no doubt listed and referenced as a result. I saw no objection to only defining the larger areas on the Proposals Map, because of the difficulty of showing the smaller sites, but I consider that it is necessary to list all sites to which the Policy would apply, the larger sites and the small, in the Plan. This list would be likely to be too unwieldy for the body of the Plan, but it could be included as an Appendix.

(iii) The flexibility of the Policy

13.5.30. It was rightly argued by Objectors that the designation of open space embraced a wide variety of open land, not all of it in public ownership, or necessarily available for public use. For some of it there would be reasonable expectations that it could in future be developed, at least in part, and some of the land was held with this purpose in mind. The renewed emphasis on concentrating development in the urban areas made the protection from development of open land of real value to those areas more important, but required a realistic approach to that assessment. That would require that land was not defined where there was a need for development to take place, or if that could not be foreseen with certainty, a flexibility in the Policy to allow for these circumstances.

13.5.31. In the Plan area there were three particular instances where this problem was brought closely into focus. The first of these was the Cathedral. Prominent on a hilltop, the

Cathedral is at present substantially surrounded by open land. However, the concept for the Cathedral included the development of ancillary buildings in its vicinity, only part of the original plan having been so far completed. It was said to be unlikely that further building would take place in the Plan period, but there was a need to continue with the planning of development and the necessary fund raising and plans for further stages could well emerge within the next few years.

13.5.32. As deposited, the Plan included a Policy (Policy 99H17) that related specifically to the Cathedral and accepted development, with safeguards. This Policy was seen as too restrictive by the Cathedral authorities, and unnecessary by the Council, the Policies for the protection of listed buildings serving the same purpose. It was proposed to be removed. Without that Policy, this, under which most of the open land about the Cathedral is designated, could be seen to prevent further development for the purposes of the Cathedral. Development would only be permitted if it were ancillary to the open use, enhanced the recreational value, or alternative provision of open land were made.

13.5.33. The situation that arose in relation to the main campus of the University of Surrey was not dissimilar. The main areas of open land within the campus were designated under the Policy. There was no suggestion that these open areas would be required for substantial development, and were identified on the master plan for the University, but the Policy would prevent development for University purposes and could prove a handicap to the flexibility of future planning.

13.5.34. There was discussion at the Inquiry of ways in which the Policy might be made to accommodate the reasonable need for development in circumstances such as these without losing its main objective. In both of these instances there was no immediate need for development put forward and the Council was prepared to see the protection of these open areas as something which could be revised in a future plan, or proposals when they materialised considered as exceptions.

13.5.35. I considered whether it was necessary to apply the Policy to open spaces on large, substantially developed sites where there were single ownerships and management structures, working to master plans in which the Council had been or would be likely to be involved. I could, nevertheless, see the advantages of a common approach to all open land meeting the definition used in CD18, including these large private areas, along with other public and private land. There is in relation to the protection of open land a need for continuity in the longer term, but the retention of land such as the areas concerned here would need to be the result of a balancing exercise of the benefits to the organisation and the public at large against the harm of the loss.

13.5.36. There were a number of suggestions made as to the wording of the Policy and the Council itself put forward a modified version. The Council submitted, and I agree, for the reasons given in the previous paragraph, that the Policy should be cautious in introducing exceptions and that, if the Policy is to be effective, it should not be based on the concept of balancing benefit and harm. That should remain a consideration for the exceptional case. The Policy should be framed essentially to safeguard open space and its contribution to recreation, amenity or the character of the area.

13.5.37. In so far as these particular circumstances were concerned, therefore, I supported the revised wording of the Council with only some further changes which arose from points I have made above. These are incorporated in the recommendation.

13.5.38. The third instance where there could be seen to be specific circumstances that had an influence on the Policy was that of school playing fields. There were no representations that these should not be protected, but that protection should be tempered with recognition of the changing needs of schools, particularly needs to provide specialist teaching facilities on their main sites. It was put that the schools themselves had to balance the needs for accommodation, often driven by the National Curriculum, and their valued recreation and sports facilities. In inserting a further hurdle the Policy was making it more difficult for schools to meet their essential needs.

13.5.39. The Policy contained a clause (Clause 5) relating to school playing fields and the needs for further development for educational purposes. Policy 99CF4, the Policy permitting the expansion of schools, related further development to this Policy. Points arose about Policy 99CF4, considered in that Chapter, but Objectors felt, in the first place, that this Policy was not needed in addition to Policy 99G2(10), considered above, and that, if it were included, Clause 5 should be changed to reduce its design content, a matter also covered by both Policy 99G2(10) and 99CF4.

13.5.40. School playing fields are regarded by the advice as a recreational resource that should be protected and I see it as appropriate to extend this Policy to them. That there are special circumstances surrounding these open spaces, as in the earlier two instances of specific sorts of open spaces, was readily apparent and already recognised by the Policy. I did not consider that the first two instances required changes to the Policy beyond those suggested by the Council to accommodate the Objectors' reasonable requirements. In the case of schools a specific clause is useful, because of the variety of circumstances in which educational needs can arise. The Clause was criticised for its rigidity on matters of siting and design and an alternative was suggested :-

"5. In the case of school playing fields, the proposed new development meets a legitimate educational need as supported by Policy 99CF4."

13.5.41. I could see that the original wording of the Clause was designed less as a control of design than to minimise the amount of the school playing field that might be taken by development. However, I also accepted that this would be better tackled by a general design solution, rather than be weighted so heavily by this one consideration.

CHAPTER 13. RECOMMENDATION 6.

13.5.7. That Policy 99R5 be worded as follows:-

PROPOSALS FOR THE DEVELOPMENT OF OPEN SPACE WILL ONLY BE ALLOWED IF THERE IS NO MATERIAL HARM TO THE CHARACTER AND VISUAL AMENITY OF THE AREA AND:

1. THE PROPOSED DEVELOPMENT IS ANCILLARY TO THE OPEN USE OF THE LAND; OR
2. THE PROPOSED DEVELOPMENT ENHANCES THE RECREATIONAL USE OF THE LAND; OR
3. WHERE EQUIVALENT OPEN SPACE PROVISION IS MADE NEARBY; OR
4. WHERE THERE WILL CONTINUE TO BE ADEQUATE OPEN SPACE IN THE LOCALITY; OR
5. IN THE CASE OF SCHOOL PLAYING FIELDS, THE PROPOSED NEW DEVELOPMENT MEETS A LEGITIMATE EDUCATIONAL NEED THAT IS APPROPRIATELY MET ON THE SITE.

OPEN SPACES WITHIN THE URBAN AREA WHICH ARE CONSIDERED TO MAKE A POSITIVE CONTRIBUTION TO THE CHARACTER AND VISUAL AMENITY OF THE AREA ARE LISTED IN APPENDIX X. SITES OF MORE THAN 0.4HA (1 ACRE) ARE IDENTIFIED ON THE PROPOSALS MAP.

- 13.5.8. That PC139 be made.
- 13.5.9. That PC230 be made.
- 13.5.10. That a list of all open spaces covered by the Policy be included in the Appendices to the Plan.
- 13.5.10. That consideration be given to retitling and changing the wording of Policy 99R1 to relate it to the "LOSS OF LAND AND FACILITIES FOR SPORT AND PHYSICAL RECREATION".
- 13.5.11. That the following be added to the reasoned justification of Policy 99R5:-

WHERE LAND IS CONTRIBUTING TO THE CHARACTER AND AMENITY OF AREAS BY DEFINING THE SEPARATE IDENTITY OF COMMUNITIES AND THE STRUCTURE OF THE URBAN AREA THIS WILL BE SEEN AS AN ADDED REASON FOR ITS PROTECTION.

(b) Objections relating to identified open spaces.

13.5.42. The criteria for the selection of sites for identification in the Plan to which this Policy will apply were given in CD18, Appendix 1. The criteria fell into two groups, initially a list of the types of open spaces included. Secondly, were given requirements that they should lie within the urban areas as defined by the Plan and contribute to the character and amenity of the urban area. The Appendix went on to list categories of open land that had

been excluded. There was an implication in the second and third of these lists that land under 0.4ha in extent was to be excluded, but the Plan made clear that smaller sites that met the general requirements of being open and contributing to the character and amenity of the urban area were covered by the Policy. The recommendations above seek to make the land to which the Policy applies certain and its implications more clear.

13.5.43. The main issue to arise in each case was whether the land was properly identified, having regard to the objectives of the Policy.

(i) Land at Guildford Cathedral

Objectors

Objection 118

Mr R C Shrimplin

Objection 175

Dean and Chapter of Guildford Cathedral

13.5.44. The designation, as far as I could see, included practically all of the open land remaining on the Cathedral site for which there was no planning permission for building. It was clear that the Cathedral remained intent on completing the original concept of providing a precinct around the Cathedral for the ancillary and support facilities needed in its role not simply as a church, but an administrative and religious centre for the diocese. This would require building on some if not all of this land.

13.5.45. The Council's stance was somewhat equivocal. Evidence was given that there was recognition of the longer term plans for completion of the Cathedral precinct and the designation of the land at this stage would not prevent these plans being brought to fruition. Evidence was also given as to the importance the Council attached to this land as open space as part of the setting of the Cathedral and to the character and amenity of the urban area. The two positions are not irreconcilable and it seemed likely that, as with the University, the way forward is an agreed master plan in which the areas to remain open are identified and given support by the Plan.

13.5.46. I have commented above that I have not seen a need to change the Policy, and, development still being a distant prospect, I am not suggesting a change to the areas designated around the Cathedral. However, recognition could be given to the need of the Cathedral to plan for the future in the reasoned justification. This I suggest takes the form of an additional Paragraph following Paragraph 10.24:-

The open space surrounding Guildford Cathedral has been included in this Policy. The Council considers that this land contributes significantly to the setting of the Cathedral and to the character and amenity of the urban area. It is, nevertheless, recognised that development will be necessary for purposes ancillary to the Cathedral and to complete the concept of its establishment. The Council will work with the Cathedral to ensure that the best design solutions are found.

(ii) Land at the University of Surrey Stag Hill Campus

Objector

Objections 366,821

University of Surrey

13.5.47. The Objections related to the main areas of open land forming the park-like setting of the buildings within the main University Campus. They provide some sports pitches and space for informal recreation and relaxation, although the central open area is used to pitch marquees, etc., for major University events. In designating these areas the Plan is reflecting the master plan for the University. The University considered this to be unnecessary, but I have accepted that it is appropriate to include these areas in the designation, noting that inclusion would not prevent consideration of development encroaching onto these areas, if it were imperative for the purposes of the University.

13.5.48. I considered whether there might be recognition given to the needs of the University in the reasoned justification, but the situation there is more settled, and agreed, than in the case of the Cathedral and it appeared to me to be unnecessary.

(iii) Land between 6, Cathedral Close and 1, Cathedral Cottages, Guildford

Objectors

Objection 598

Ridgemount Residents Association

13.5.49. This small area of open land forms a window to Ridgemount from the main open areas around the Cathedral which rise to the north. The site has been granted planning permission for residential development and for this reason was excluded from the open space designation.

13.5.50. I could appreciate the arguments of the Resident's Association that when designating the land around the Cathedral this land, which remains undeveloped, was not easily distinguishable from the remainder and performed a valuable function in providing views towards the Cathedral as well as adding to the character of Ridgemount. The concerns that creeping development could absorb this and other of the open land, which was of value to the green setting of the Cathedral and the appearance of the town. There were also representations that the hedge fronting the road was an ancient one and should be preserved.

13.5.51. The Council said that development on this land had been considered carefully in relation to the setting of the Cathedral and had been found acceptable. The hedge would be largely retained. That there was an outstanding permission for development disqualified it for designation under this Policy. I could accept that this was the right conclusion. I noted the discussion at the Hearing about the need for comprehensive plans for the Cathedral precinct to give certainty to the areas that would be acceptable for development and that which could remain open in the long term and the recognition they might be given in the Plan. I took them into account in making the recommendation referred to above.

- (iv) School playing fields at Yeoman's Bridge Secondary School and allotments at Spoil Lane, Tongham.

Objector

Objection 647

Laing Homes

13.5.52. The school playing fields and the allotments are separated by several fields which, in another Objection, the Objectors wished to see allocated for housing. While the allotments have a disused railway on the south eastern side with development in The Cardinals beyond and could thus be seen to have development on two sides, with the school playing fields and the intervening land they are subject to the Countryside Beyond the Green Belt notation. Had I accepted that the intervening land should be allocated for development there would have been a case for transferring the allotments from the countryside designation to designation under this Policy. However, without that change, neither area of land would need or qualify by the criteria of CD18 for designation in respect of their open space role.

- (v) Land in Millbrook, Guildford.

Objector

Objection 1270

Debenhams

13.5.53. The Objection related to a small area of land between the northern end of Debenhams store and Old Town Bridge, fronting onto the River Wey to the west and Millbrook to the east. The land is in part planted and in part occupied by the access to the subway beneath Millbrook, the subway also giving an access to the store.

13.5.54. The Objector referred to approved changes to the store which would improve access and the appearance of the store at this corner, although they did not appear to significantly affect this open area. The submissions in relation to the designation of this site under the Policy were that the land was in the Conservation Area and control under this Policy was not necessary and that at less than 0.4ha the site need not be shown on the Proposals Map.

13.5.55. The Council said that the site had been shown on the Proposals Map by being taken with other small open areas about Old Town Bridge which, individually were of less than 0.4ha, although of a larger area in total. It was agreed that they should not be shown on the Proposals Map. Whether the Policy would, nevertheless, apply to them was not altogether clear from the Policy in its deposited form, reference to the smaller sites only being in the reasoned justification, and I have suggested changes to the wording of the Policy and the listing of sites that will make it easier to see where it would apply. I have assumed from the Council's response to the Objection that this and the neighbouring small sites would be among those listed if the designation was removed from the Proposals Map, something I saw to be appropriate.

(vi) Pewley Hill Reservoir, Guildford

Objector

Objection 1432

Thames Water Property Ltd

Background, Objection and Issues

13.5.56. The site is an elevated one close to the summit of Pewley Hill to the south east of Guildford Town Centre. It has an area of about 1.6ha and currently contains two covered reservoirs and some ancillary buildings. The surrounding area is almost wholly residential in character, a modern school occupying the site of former allotments to the north in Semaphore Road. The Objection pointed out that while substantially open, the site is almost wholly developed with the reservoirs. While grass covered and the larger almost level with Pewley Hill, towards the north it rises above the neighbouring houses in Pewley Hill and Pewley Bank. The smaller reservoir adjoining Semaphore Road also increases in height in relation to the neighbouring land towards the northern boundary. If the site were no longer needed for water supply purposes it would be reasonably seen to be brownfield land that could make a valuable contribution to housing needs. The main issue I saw to be whether this site was properly included under this Policy.

Consideration

13.5.57. CD18 set out various criteria for the selection of sites to be protected under Policy 99R5, the first of which was that it is open space. PC139 proposed adding a definition of open space to the Plan, but that was not very helpful in determining if this land should be seen to be either open space or open land. My own view is that land which is substantially developed as this is cannot be seen as either. The reservoirs being low, at least when seen from Pewley Hill, and the small number of other buildings and structures on the site, there are views across the site. These are features of the site, and no doubt it could be said that they contribute to visual amenity of the area. However, if the site is not open land or open space this does not justify inclusion in the Policy, nor necessarily that development should be prevented.

13.5.58. Mention was made of the potential of the site to provide open space should its present use cease and the deficiency that exists in the area. That is a consideration for the Plan, but if it is to be pursued a policy allocating sites for new open space would be required. This is not a Policy which can reasonably be used to reserve land not already open space for future open space use or to prevent development on that account, particularly where the owner has a continuing need for the land in its present use and general permissions for a variety of operational developments.

13.5.59. I noted that the smaller reservoir was no longer used and that the site as a whole had been seen by the Council to have a potential for housing, were it to become available. I make no suggestions as to the future use of the land, but consider it is not appropriately designated under this Policy.

(vii) Land at Barnwood School, Park Barn

Objector

Objection C24

Surrey County Council

13.5.60. The Objector proposed changes to the boundary drawn under the Policy for the open land at Barnwood School. Changes had been made to the designation on the Proposals Map by PC203, but some further small modifications were considered to be required. The future of the school is under review and the land designated could be expected to be retained as open space in the longer term if the school use ceased. The Council agreed that the boundary changes agreed with the County Council should be made (PCX9).

CHAPTER 13. RECOMMENDATION 7.

13.5.12. That in Policy 99R5 the following addition be made to the reasoned justification:-

THE OPEN SPACE SURROUNDING GUILDFORD CATHEDRAL HAS BEEN INCLUDED IN THIS POLICY. THE COUNCIL CONSIDERS THAT THIS LAND CONTRIBUTES SIGNIFICANTLY TO THE SETTING OF THE CATHEDRAL AND TO THE CHARACTER AND AMENITY OF THE URBAN AREA. IT IS, NEVERTHELESS, RECOGNISED THAT DEVELOPMENT WILL BE NECESSARY FOR PURPOSES ANCILLARY TO THE CATHEDRAL AND TO COMPLETE THE CONCEPT OF ITS ESTABLISHMENT. THE COUNCIL WILL WORK WITH THE CATHEDRAL TO ENSURE THAT THE BEST DESIGN SOLUTIONS ARE FOUND.

13.5.13. That PC139 be made (removal of designation on the Proposals Map for land at Millbrook and Millmead) but that these areas of land be included in the list of sites to which Policy 99R5 applies in the Appendix.

13.5.14. That Pewley Hill Reservoir, Guildford, be not designated under Policy 99R5.

13.5.15. That the area of land designated under Policy 99R5 at Barnwood School, Park Barn, be changed as agreed with Surrey County Council.

POLICY 99R6

INTENSIFICATION OF RECREATIONAL USES

Objectors

Objection 1560

St Martha Parish Council

Background, Objections and Issues

13.5.61. The Policy relates to increasing the effective use of existing recreational areas by means of floodlighting and/or the provision of all-weather playing surfaces. Permission is conditional on amenity and traffic effects being acceptable.

13.5.62. The Objections were expressing caution, in particular, about the use of floodlighting. CPRE thought that the Policy was too encouraging and should be worded negatively rather than positively. The main issues concerned the wording of the Policy.

Consideration

13.5.63. I can accept that a negative wording in a Policy such as this could give greater emphasis to the circumstances in which floodlighting, for example, would not be permitted and put responsibility on the developer to justify development. However, the objectives of this Chapter seek the more efficient use of recreational facilities. Floodlighting and all-weather surfaces are an important way in which this can be achieved. It is, therefore, appropriate that this Policy presents a positive and encouraging stance. Where floodlighting might give rise to undesirable light pollution, or its installation create other adverse local effects, as from noise or traffic at times when a recreational area would not otherwise be used, this Policy and the General Polices would appear to me to provide an appropriate level of control.

POLICY 99R7 BUILT FACILITIES FOR RECREATIONAL USE

13.5.64. No Objections were recorded to this Policy.

6. GOLF COURSES

POLICY 99R8 GOLF COURSES

Objectors

<i>Objection 99</i>	<i>Guildford Group Ramblers Association</i>
<i>Objection 882</i>	<i>The Guildford Society (CW)</i>
<i>Objections 1561/2</i>	<i>St Martha Parish Council</i>
<i>Objections 1911, C197</i>	<i>CPRE Surrey</i>

Background, Objections and Issues

13.6.1. An objective of the Chapter is to support the use of the countryside for recreational purposes which do not prejudice its character and openness. PPG17 notes that golf courses can open up the countryside for recreation, but expresses caution as to their impact and seeks care in location and design, particularly in AONB and Green Belts. Sport

and outdoor recreation are appropriate uses in the Green Belt. The Policy permits the development of golf facilities, subject to five criteria being met. In the Surrey Hills AONB/AGLV they will only be permitted where they are consistent with the primary aim of conserving and enhancing the landscape.

13.6.2. CPRE were again concerned that the Policy was permissive, rather than negative in its wording. Other Objectors also felt that it was giving too little weight to the protection of the countryside, particularly the AONB. The main issues concern the balance of the Policy in its encouragement of golf courses, etc., and the necessary protection of a valuable countryside.

Consideration

13.6.3. As in the case of Policy 99R6, the Policy is in pursuit of an objective of the Plan and it is appropriate that it is worded positively, setting out the conditions that development should meet if permission is to be granted. It also takes account of the more stringent test to be applied in the AONB/AGLV. CPRE suggested that a further criteria be added, that there was a need for the facility, but need is not of itself normally an appropriate planning criterion, that being essentially for "the market" to determine.

13.6.4. There were concerns that the Policy should effectively prevent golf course development in the AONB/AGLV, and the Council accepted that the circumstances in which new golf development might be accepted were exceptional. There could, however, be circumstances where such development was acceptable or even beneficial and the policy should allow for these cases. This I accepted. The Council has Supplementary Planning Guidance on golf courses, referred to in the reasoned justification, which enlarges on the circumstances in which such development might be permitted. It also deals with environmental considerations including possible effects on such things as water supplies.

13.6.5. The Council proposed changes to Paragraph 13.36 (PC140) which made the grant of permission in the AONB, etc., conditional on development being "consistent with the aim of conserving and enhancing the existing landscape". As deposited, the Paragraph said that permission would not normally be granted, which went against the general intention of the Policy. The change removed a difficulty in defining "normally" in the original sentence, although there was an adequate explanation of its meaning in the Policy itself. A Counter Objection asked for a reinstatement of the original tone of prohibition by saying development would not normally be permitted in these areas unless ...

13.6.6. I supported the Council's view that to do this would detract from the generally permissive tone of the Policy, which contained all the necessary safeguards.

CHAPTER 13. RECOMMENDATION 8.

13.6.1. That PC140 be made.

7. NOISY SPORTS

POLICY 99R9 NOISY SPORTS, ADVENTURE GAMES AND SIMILAR ACTIVITIES

Objectors

Objection 498

MAFF (CW)

Objection 549

Sport England

Background, Objections and Issues

13.7.1. PPG17 notes the concern that some noisy sports can cause and the importance of minimising the conflicts between these sports and other uses. In essence, the advice suggests the designation of sites suitable for such uses and/or the framing of policies listing the appropriate considerations if such a use is to be established. The Plan does not identify sites and seeks to consider proposals against the criteria of this Policy, which is in this instance worded negatively, not permitting noisy activities unless they would do no harm to local amenity, traffic flows or various landscape and site value considerations. The reasoned justification describes the most common activities likely to come under the Policy.

13.7.2. The Objection of MAFF was that the criteria of the Policy did not include the protection of the best and most versatile agricultural land. An addition was proposed to the second criterion of the Policy to meet this omission (PC141). Sport England considered that the Policy should be positively worded with a list of the criteria for site selection, rather than give an implication that such uses would not be welcome. The main issue was whether the Policy should be more positive in its approach.

Consideration

13.7.3. Sport England, and indeed PPG17, point out that while there are locations where such uses are not acceptable, there are at the same time places where they could be accommodated satisfactorily. Most sports that come in this category have developed codes of conduct and management to reduce unwanted noise and to ensure that sites are acceptable in their appearance, the numbers attracted as participants or spectators and when they are in use. The objectives of the Plan are to encourage recreational activities in general and, as with other recreational activities, the Plan could reasonably take a positive stance.

13.7.4. Sport England suggested a rewording of the Policy:-

"Planning permission will be granted to noisy sports, adventure games and similar activities which meet the following criteria:-

1, 2 and 3, as in the deposited policy;

Support will be given to the development of a purpose built facility appropriate to these activities".

13.7.5. I agree that with the objectives of the Chapter encouraging recreational activities, there is little justification for a discouraging attitude to the noisier sports, if there can be appropriate safeguards built in. The criteria of the Policy appear to do this adequately. The changes I suggest in the recommendation are to the opening paragraph of the Policy.

CHAPTER 13. RECOMMENDATION 9.

13.7.1. That PC141 be made.

13.7.2. That the opening paragraph of Policy 99R9 be changed as follows:-

PLANNING PERMISSION WILL BE GRANTED FOR NOISY SPORTS, ADVENTURE GAMES AND SIMILAR ACTIVITIES WHERE THERE WOULD BE NO MATERIAL HARM TO THE FOLLOWING:-

8. WATER BASED RECREATIONAL ACTIVITIES

POLICY 99R10 WATER BASED RECREATIONAL ACTIVITIES

Objector

Objection 499 *MAFF (CW)*

13.8.1. The Objection was that the Policy did not take account of the need to protect the best and most versatile agricultural land. The Council proposed an addition to Criterion 1 (PC142) which met the Objection.

CHAPTER 13. RECOMMENDATION 10.

13.8.1. That PC142 be made.

9. BLACKWATER VALLEY

POLICY 99R11 BLACKWATER VALLEY

Objectors

<i>Objection 538</i>	<i>Waverley Borough Council (CW)</i>
<i>Objection 712</i>	<i>Rushmoor Borough Council</i>
<i>Objection 717</i>	<i>Hampshire County Council</i>
<i>Objection 1176</i>	<i>Scottish and Southern Energy</i>
<i>Objection 1254</i>	<i>Ash Parish Council</i>
<i>Objection 1323</i>	<i>Surrey Wildlife Trust (CW)</i>

Background, Objections and Issues

13.9.1. Structure Plan Policy PE5 relates specifically to the Blackwater Valley Strategic Gap, where open land is to be protected and enhancement of the landscape and nature conservation and improved public access for outdoor sport and recreation are to be promoted. The general extent of the Gap in Surrey, it extends into three Counties and several District Council areas, is shown on the Key Diagram. Structure Plan Policy PE6 makes special provision for safeguarding and enhancing the amenity, environmental and recreational value of river valleys, including the Blackwater Valley.

13.9.2. The Blackwater Valley Strategy has been adopted by the authorities concerned to provide the necessary coordination of land use and management plans in the different authority's areas (CD115/6). The Strategy sets out a series of aims and objectives and a number of agreed policies for the area as a whole as well as individual parts of the Valley.

13.9.3. The Policy provides a basis for the implementation of proposals contained in the Strategy in the Plan area. The reasoned justification gives the background and something of the objectives. Objectors considered that the Policy was not sufficiently emphatic as to the strategic purposes of the Gap, nor sufficiently strong in promoting enhancement of the Valley. Hampshire County Council and Rushmoor Borough Council saw the Policy, expressed to protect the strategic function, more appropriately included in the Rural Environment Chapter (with an appropriate reference in the objectives to the protection of strategic gaps). Surrey Wildlife Trust sought greater recognition of the nature conservation function, the Council proposing a change to make this a separate criterion (PC143). Other Objections related to specific areas of land, the Council agreeing to change the Proposals Map in respect of the representations by Waverley Borough Council (PC143).

13.9.4. The main issues in relation to the general Objections was whether there should be further changes to the Policy. Other than that by Waverley Borough Council, which was conditionally withdrawn, the site specific Objections are considered individually.

Consideration

(a) General Objections

13.9.5. At the broad structural level, the Blackwater Valley has an important role in separating the built up areas which bound the often narrow strip of open land which borders the river. Over the years the area has been subjected to considerable pressures for development and for gravel working, which have left much of it degraded. The Strategy seeks to recover and put to recreational use this land, which can be regarded as an objective secondary to that of keeping the land open.

13.9.6. In its deposited form, the Policy made reference to the strategic role in the first criterion, and enlarged on that in the reasoned justification. However, the importance of keeping the land open would be justification for including the Policy among those concerned

with landscape and structural matters, as in the early part of Chapter 10, Rural Environment. The Policy for protecting the "Countryside Beyond the Green Belt" applies also to this land and an appropriate place could be to follow that Policy. An added objective "To protect the function of strategic gaps in separating neighbouring settlements" would be appropriate.

13.9.7. Hampshire County Council suggested a wording for the Policy, a similar wording having been used in the Surrey Heath Local Plan. There is much to be said for the same policy being used in adjacent plans which are dealing with the same subject. However, I accept that Plans differ in their arrangement and in the way they word their policies and there is not necessarily one right way, the rest being wrong. While I lean in favour of the County Council's view, I do not recommend the relocation of the Policy, only suggest it for the Council's further consideration.

13.9.8. I do consider that, if the Policy is kept substantially in its present form, some further changes would give greater emphasis to the strategic function of the gap. More might also be said in the reasoned justification. I include some suggestions in the recommendation.

CHAPTER 13. RECOMMENDATION 11.

13.9.1. That the first paragraph of Policy 99R11 be changed as follows:-

THE BLACKWATER VALLEY STRATEGIC GAP AS SHOWN ON THE PROPOSALS MAP WILL BE MAINTAINED IN ORDER TO PREVENT THE COALESCENCE OF THE SETTLEMENTS IN THE VALLEY. DEVELOPMENT WILL ONLY BE PERMITTED WHICH:

13.9.2. That Paragraph 13.43 be changed as follows:-

13.43. THE BLACKWATER VALLEY IS RECOGNISED IN POLICY PE6 OF THE 1994 SURREY STRUCTURE PLAN AS AN IMPORTANT LONG TERM OPEN GAP PREVENTING THE COALESCENCE OF THE TOWNS AND VILLAGES OF THE VALLEY, IN THE PLAN AREA ASH AND TONGHAM FROM ALDERSHOT AND FARNBOROUGH. THE VALLEY ALSO PROVIDES AN EASILY ACCESSIBLE AREA FOR THE RECREATION OF THOSE LIVING NEARBY AND VALUABLE LANDSCAPE AND NATURE CONSERVATION OPPORTUNITIES.

13.9.3. That PC143 be made, except as it relates to the first paragraph of the Policy.

13.9.4. That consideration be given to moving Policy 99R11 to Chapter 10 and to the inclusion of a further objective in that Chapter.

- (b) Land at the junction of Aldershot Road and Blackwater Valley Road, Ash

Objector

Objections 1175/6

Southern and Scottish Electric Plc

13.9.9. The site is on the northern side of Aldershot Road, roughly triangular in shape, its western side adjoining the embankment of the Blackwater Valley Road and its north eastern houses in Underwood Avenue. The site is largely open, containing a single storey building once the club house for a sports club which occupied this site and land to the west that was subsequently taken for the Blackwater Valley road.

13.9.10. In the Objectors view, the site should be seen as "brownfield" and, being somewhat isolated from the main areas of open land in the Valley by the new road, to have more in common with the adjoining urban area. It could reasonably be developed without harm to the objectives of the Policy. If required, development could be arranged to allow planting along the boundary of the new road to ensure continuity of the corridor.

13.9.11. On visiting this site it was clear that the road has occupied almost the whole of the open land of the valley and at this point the objectives of the strategic gap are under particular strain, as are the opportunities for maintaining the continuity of open land along the valley. I could appreciate that the truncation of the former sports fields has made a recreational use for the part remaining more difficult, but it would need to be shown that it was no longer practical, as earlier Policies of this Chapter would require. I accepted that by the definition of PPG3 this is not strictly to be seen as brownfield land.

13.9.12. I concluded that at this stage at least the boundary drawn by the Plan was correct and saw this instance as further justification for adding emphasis to the "gap" function of the Policy.

- (c) Land at Grange Road, Tongham

Objector

Objection 1502

Beazer Strategic Land

13.9.13. The Objection related to land between Grange Road and the rear gardens of houses in The Street on the southern edge of Tongham. The Objectors sought the removal of the "Countryside Beyond the Green Belt" and the "Blackwater Valley" designations from the land and its allocation for housing development. I have earlier concluded that there is no need to allocate more land for housing in the Plan period. The "Countryside Beyond the Green Belt" appears to me to be appropriately maintained on this land, which is essentially open agricultural land beyond the built up area of Tongham.

13.9.14. The site appeared to have been in the area designated for the Blackwater Valley Strategy since its inception and, if the "gap" runs into the broader countryside to the south of the A31 at this point there is still a need to have regard to the structural consequence of

reducing the width and thus the effectiveness of the gap. I noted that my predecessor recommended a boundary following Grange Road, but, while this land remains open, I see it as appropriate to keep it within the Blackwater Valley designation.

10. HORSE-RELATED DEVELOPMENT

POLICY 99R12 NON-COMMERCIAL HORSE-RELATED DEVELOPMENT

Objectors

<i>Objection 544</i>	<i>Sport England (CW)</i>
<i>Objection 1324</i>	<i>Surrey Wildlife Trust (CW)</i>
<i>Objection 1915</i>	<i>CPRE Surrey</i>

Background, Objections and Issues

13.10.1. The two Policies of the Section have as their objective the control of the less desirable effects of what has become a popular recreation, but has also brought changes to the appearance and management of the countryside. The Policies divide the control between the "amateur" and the "professional" establishments, the difference being likely to be reflected in terms of the scale and the levels of activity. This policy is concerned with the generally small scale domestic keeping of horses.

13.10.2. The policy is permissive, limited by criteria related to the most common problems, location of buildings, their scale and appearance and the availability of sufficient land. Surrey Wildlife Trust asked for the nature conservation interest of sites also to be taken into account, the Council agreeing to add a further criterion (PC144). Sport England were concerned that advice on the care of horses should be referred to and considered that a limitation to only one stable in open countryside locations, mentioned in Paragraph 13.51, was unreasonable. The Council proposed to make several changes in these respects (PC144).

13.10.3. CPRE raised two points, the first asking for changes of use of buildings erected as stables to be resisted, and for redundant stables to be demolished, which the Council accepted (PC144). It was also asked that the Policy be worded negatively, the only outstanding issue.

Consideration

13.10.4. As mentioned earlier, the advice is that wherever possible planning policies should be worded positively where there is no presumption against development of a particular sort. In this Chapter the provision of facilities for recreation is being encouraged and it is appropriate that the Policies should be worded to permit development where it would not harm the particular interests identified in the Policies. As in the other instances, I do not think that the form of the Policy should be changed.

CHAPTER 13. RECOMMENDATION 12.

13.10.1. That PC144 be made.

POLICY 99R13 COMMERCIAL HORSE-RELATED DEVELOPMENT

Objectors

<i>Objection 1325</i>	<i>Surrey Wildlife Trust (CW)</i>
<i>Objection 1370</i>	<i>Effingham Parish Council</i>
<i>Objection 1677</i>	<i>Country Landowners Association</i>

Background, Objections and Issues

13.10.5. As above, the Surrey Wildlife Trust was concerned to ensure that nature conservation interests were taken into account. The Country Landowners Association asked for recognition of the contribution that commercial horse-related development can make to the local economy. The Council agreed to additions to the Policy and the reasoned justification to meet these points (PC145, PC231). Effingham Parish Council asked for a statement that the traffic implications of development would be taken into account. Whether this should be done was the outstanding issue.

Consideration

13.10.6. Paragraph 13.54 gives an indication that access and traffic implications of any proposal for development under the Policy would be taken into account. This is not specifically mentioned in the Policy, except in so far as these matters might have an adverse effect on the rural character of the countryside. They are, however, covered by other Policies of the Plan, particularly Policy 99G1(2), and I do not see it to be necessary for them to be mentioned again in this Policy.

CHAPTER 13. RECOMMENDATION 13.

13.10.2. That PC145 be made.

13.10.3. That PC231 be made.

CHAPTER 14. TOURISM

1. INTRODUCTION

14.1.1. The opening Section of the Chapter attracted no Objections, but there were several Objections which raised matters which did not fit easily into other Sections. I have considered them here.

(a) Allocation of a site for Hotel development

Objectors

Objection 756,1388

Guildford Business Forum

Objection 1267

Guildford Chamber of Commerce

14.1.2. The Objectors commented on the recognised need for the provision of additional hotel facilities in Guildford. It was noted that a number of the sites identified in Chapter 9, Guildford Town Centre Redevelopment Sites, included an hotel among the acceptable uses, but they were concerned that, if an hotel development had to compete with other uses for the site, it would be less likely to be realised. If Guildford was to develop from a day visit centre to one attracting short stays, with the benefits that would bring to the local economy, the assured provision of additional hotel accommodation would be essential. It was felt that a suitable site should be allocated solely for the purpose.

14.1.3. The Plan acknowledges the need for more hotel accommodation, and it was noted in Chapter 9 that there was a need, not just for further hotel accommodation, but for one hotel at least that could also offer conference and banqueting facilities. The Council was reluctant to allocate a site specifically for hotel use, but several of those mentioned in Chapter 9 would be suitable for hotels forming parts of mixed use developments, while there were at least two that would be of a size to accommodate the full hotel, conference, leisure and banqueting uses. With the Council, I do not consider that the Plan should allocate these sites only for an hotel. In the end the provision of an hotel will be for developers to decide and if the demand is as great as is represented there would be a reasonable prospect that an hotel could compete successfully with other developments that might be acceptable on the sites.

(b) Future of the Civic Hall

Objectors

Objection 1267

Guildford Chamber of Commerce

Objection 1388

Guildford Business Forum

14.1.4. The question of the development of the Civic Hall also arose in Chapter 9. The Hall was regarded as now outdated and a site that could be used to provide the quality conference and auditorium facilities needed by the town.

14.1.5. As was said in Chapter 9, the Civic Hall has been refurbished in recent years and the Council has no plans for its replacement or redevelopment. That being so, there would be no basis for including the site among those of Chapter 9, or of referring to the prospects in the Plan.

(c) Inclusion of Policy 17R, Footpaths and Bridleways, of the adopted plan.

Objector

Objection 696

West Clandon Parish Council

14.1.6. In the adopted plan "Tourism" was included in the same Chapter as "Recreation and Leisure". Policy 17R promoted the creation, improvement and effective management of footpaths and bridleways. It was asked that this commitment be incorporated in the Plan.

14.1.7. In the Council's view, the rearrangement of Policies in the Plan has put the intentions of Policy 17R into Policy 99M8. In the Recreation Chapter (Chapter 13) attention is drawn to the role of the Council and the County Council in the creation of new footpaths, providing links and filling gaps (Paragraph 13.7 and PC135). Although the Plan does pay considerable attention to pedestrian routes and cycleways in Chapter 7, their recreational value is more apparent from the changes proposed to the Proposals Map than from the Policy. Bridleways became lost in the process. In the Movement Chapter I have suggested small changes to ensure that the recreational value of walking and cycling is recognised and in the Recreation Chapter additions are proposed to cover bridleways.

2. OBJECTIVES

Objector

Objection 869

Guildford Environmental Forum (CW)

14.2.1. The only Objection relating to the Section sprang from the Objector's support for the objectives of sustainable development. Appropriate to this Chapter was seen to be an additional objective:-

"To encourage access to tourist facilities by means other than the private car."

14.2.2. In PC146 the Council proposed that this be added to the list of objectives in Paragraph 14.6, which I saw to be appropriate.

CHAPTER 14. RECOMMENDATION 1.

14.2.1. That PC146 be made.

3. SUPPORTING MEASURES

Objector

Objection 1563

St Martha Parish Council

14.3.1. The second of the supporting measures listed in Paragraph 14.7 is "Investigate potential sites for additional hotels". The Objector asked for the addition of "which should be located on brownfield sites".

14.3.2. Aim 6 (Chapter 3) indicates that the Plan envisages the development needs of the Borough being accommodated primarily by the re-use of existing developed land. The sites in Guildford Town Centre considered suitable to accommodate new hotels (Chapter 9) are all "brownfield". While it could be seen to add extra emphasis by repeating the objective here, this is a list of supporting measures rather than policies and would appear unnecessary.

4. ARTS, ENTERTAINMENT AND OTHER VISITOR RELATED DEVELOPMENT

POLICY 99T1 ARTS, ENTERTAINMENT AND OTHER VISITOR
RELATED DEVELOPMENT IN URBAN AREAS AND
IDENTIFIED SETTLEMENTS

Objector

Objections 344,2072

GOSE

14.4.1. The first Objection was that Criterion 4 of the Policy was overly restrictive in requiring that parking should be accommodated in the development, while not encouraging access by non-car modes. This was conditionally withdrawn. The second related to the following Policy specifically, but questioned the phrase "other visitor related development".

14.4.2. I could see that the phrase could be considered too vague and requiring definition if it was to be used and supported the Council's proposal to remove it (PC148). The proposed Change, however, related only to its use in the Policy and it would seem desirable to remove it from the title of the Policy (and from the titles of the following Policies) although I saw no less reason to remove it from the title of the Section.

14.4.3. As to Criterion 4, the Plan includes parking standards for many of the developments that are likely to come forward under this Policy. The wording of the Criterion in its deposited form appeared to me to better meet this requirement than the more tentative wording proposed in PC147. I did not see that the original lacked flexibility and it can be assumed that the revised parking standards take account of the objective of reducing car use and encouraging alternatives. I do not recommend that this change be made.

CHAPTER 14. RECOMMENDATION 2.

- 14.4.1. That PC148 be made (and, in addition. "AND OTHER RELATED DEVELOPMENT" be deleted from the title of Policy 99T1, Policy 99T2 and Policy 99T3.
- 14.4.2. That PC147 be NOT made.

POLICY 99T2 SAFEGUARDING ARTS, ENTERTAINMENT AND OTHER VISITOR RELATED DEVELOPMENT

Objectors

Objection 682 Rank Leisure Division
Objections 2045, 2072 GOSE

Objections

14.4.4. The Policy seeks to retain existing arts and entertainment sites, or to secure replacement. The GOSE Objections were similar to those made above, the Council proposing to remove "and other visitor related development" from the Policy by PC148, and to the inappropriate use of policy statements to secure objectives achievable under other legislation. The first of the Objections was conditionally withdrawn.

14.4.5. Rank Leisure Division considered the wording of the Policy too restrictive. The leisure industry was dynamic, with changing requirements which should be recognised. Many buildings built for leisure uses were no longer suitable for such uses and in those cases reuse should be encouraged.

Consideration

14.4.6. I could see point to the Objection of Rank Leisure Division if the Policy is to be applied to essentially commercial arts and entertainment facilities, and to that of GOSE if applied to those that are quasi-public. However, the Policy allowed for obsolete or badly sited premises to be put to more economic or appropriate uses and this, if applied reasonably, should ensure that the dynamics of the commercial entertainments and leisure industry, in so far as they are affected by this Policy, are protected. I saw no need for changes beyond that proposed by the Council in PC148, except that the removal of the phrase would require the addition of "facilities" or some similar word if the remaining text is to make sense. A change to the title was suggested earlier.

CHAPTER 14. RECOMMENDATION 3.

- 14.4.3. That PC148 be made, and "FACILITIES" be added in its place.

POLICY 99T3

RURAL ARTS, ENTERTAINMENT AND OTHER VISITOR
RELATED DEVELOPMENTS

Objector

Objection 1292

South East England Tourist Board (CW)

14.4.7. The Objection considered that the intention of the Policy was not clear, with which I can only agree. The Objection went on to suggest that the second criterion should be modified to indicate that "Where possible" suitable existing buildings should be used. The Council proposed to add these words in PC149.

14.4.8. From Paragraph 14.12 I had difficulty in seeing why this Policy was thought to be necessary in addition to Policy 99RE9, and if it were, why it was included in this Chapter rather than Chapter 15, Community Facilities. I have no Objection to the Proposed Change, but I consider that if this Policy is to remain in the Plan some better explanation of its purpose is required, perhaps confining its impact to the reuse of rural buildings, rather than appearing to open up the possibility of development in the countryside.

CHAPTER 14. RECOMMENDATION 4.

14.4.4. That either

1. Policy 99T3 be omitted, or
2. An explanation of the purpose of the Policy be provided in the reasoned justification and the Policy changed to relate only to the reuse of rural buildings for purposes of art or entertainment.

POLICY 99T4

NEW HOTELS, GUEST HOUSES AND OTHER
OVERNIGHT ACCOMMODATION IN URBAN AREAS

Objectors

Objection 345

GOSE (CW)

Objection 515

St Catherine's Village Association

Objection 1564

St Martha Parish Council

Objection 1793

Mr A E Rees

14.4.9. The Policy permits the provision of new hotels, etc., and the extension of those existing, in the defined urban areas. An indication is given in Paragraph 14.15 that extensions to hotels, etc., outside the urban areas, in the countryside, and presumably in the identified settlements, may be permitted "where development complies with the relevant countryside policies".

14.4.10. Structure Plan Policy DP23 confines hotel development to urban areas and requires sites to be identified. The Plan identifies several sites in Guildford Town Centre on which the development of an hotel would be accepted. This Policy could be seen to be enabling that to take place, but it also meets the second part of the Structure Plan Policy, which encourages the provision of a range of overnight accommodation to meet different needs. Not all opportunities for hotel development could necessarily be identified in the Plan. Opportunities for other sorts of accommodation, particularly where the scale is small, could probably not be identified. I did not see the Policy to be other than in conformity with the Structure Plan.

14.4.11. GOSE expressed the same concern to Criterion 4 of the Policy as had been expressed to the same Criterion in Policy 99T1, but appeared satisfied by the proposed change of "The" to "Any". As in that case, there is a requirement of the Plan to meet parking standards, the revised standards taking account of the needs to reduce the use of the car. My suggestion is again that the Criterion is not changed (PC150).

14.4.12. Mr Rees said there was a need for substantial proof that there was a requirement for a further hotel and conference facilities in the Town Centre. The Council pointed to the high occupancy rates in existing hotels and to the support the proposal received from the Chamber of Commerce and the Business Forum. St Martha Parish Council and Mr Rees were concerned with traffic generation, but the Town Centre would be the most sustainable location for such a development, accessible by public transport.

14.4.13. St Catherine's Village Association considered that the adaptation of buildings to provide overnight accommodation could have affects on local amenity. It was asked that the Policy include safeguards beyond those of Criteria 1 and 3. It appeared to me, as to the Council, that the General Policies made further strengthening here unnecessary.

CHAPTER 14. RECOMMENDATION 5.

14.4.5. That PC150 be NOT made.

POLICY 99T5 SAFEGUARDING HOTELS, GUEST HOUSES AND OTHER OVERNIGHT ACCOMMODATION

14.4.14. There were no Objections recorded to this Policy.

POLICY 99T6 CHANGE OF USE TO GUEST HOUSES AND OTHER ACCOMMODATION

Objector

Objection 1293

South East England Tourist Board

14.4.15. The Objector made the points that the Policy was confined to the urban areas, while referring to the reuse of rural buildings in Paragraph 14.19 in the context of Policy 99RE10 and related Policies. If not in this Policy, the provision of overnight accommodation in rural areas should be specifically mentioned in Policy 99RE10.

14.4.16. The Policy appeared to be directed to changes of use for the smaller hotels/guest houses and bed and breakfast accommodation. In the urban areas it added nothing of significance to Policy 99T4 and its main impact would be on the identified settlements. Whether the Policy should be confined to the identified settlements, or also take in the change of use of buildings in the countryside is a matter for consideration. In the contexts of farm diversification, or the reuse of rural buildings, a change of use would not necessarily be contrary to Green Belt policy. Policies 99RE9 and 99RE10 do not mention this possibility, although it could be seen to come within Policy 99RE8.

14.4.17. In my view, the Policy should be changed to omit the reference to urban areas. Rather than add to the Policy, the position in the rural areas could be clarified and this might best be done by changing Paragraph 14.19. A suggestion is in the recommendation.

CHAPTER 14. RECOMMENDATION 6.

14.4.6. That in Policy 99T6 URBAN AREAS AND be omitted.

14.4.7. That Paragraph 14.19 be omitted and in its place substituted:-

14.19. IN THE RURAL AREAS PROPOSALS FOR OVERNIGHT ACCOMMODATION WILL BE CONSIDERED AS PART OF FARM DIVERSIFICATION SCHEMES UNDER POLICY 99RE8 OR IN THE CONTEXT OF THE REUSE OF RURAL BUILDINGS UNDER POLICY 99RE9 AND POLICY 99RE10. OTHER PROPOSALS WILL BE CONSIDERED IN THE LIGHT OF THE OBJECTIVES OF THE GREEN BELT OR COUNTRYSIDE BEYOND THE GREEN BELT DESIGNATIONS AND THE GENERAL POLICIES OF THE PLAN.

POLICY 99T7 STATIC RECREATIONAL CARAVANS AND CHALETS IN THE COUNTRYSIDE

14.4.18. No Objections were recorded to this Policy.

POLICY 99T8 LOSS OF RECREATIONAL CARAVAN AND CAMPING SITES

Objector

Objection 1916

CPRE Surrey

14.4.19. The Objection concerned the wording of Paragraph 14.21. The final sentence was "It is, however, considered desirable to resist the loss of existing sites for the demand that exists, particularly as the opportunities for finding suitable new sites are restricted". The Objector suggested adding "Unless cessation of use could serve to enhance the landscape or restore countryside character". The Council was willing to accept this addition (PC151).

14.4.20. To add this phrase would give a valuable flexibility to the interpretation of the Policy, although for this to be effective it would be preferable for the addition to be added to the Policy itself.

CHAPTER 14. RECOMMENDATION 7.

14.4.8. That PC151 be made.

14.4.9. That the following be added to Policy 99T8:-

... UNLESS CESSATION OF USE WOULD SIGNIFICANTLY ENHANCE THE LANDSCAPE OR COUNTRYSIDE CHARACTER.

POLICY 99T9 NEW SITES FOR TOURING CARAVANS AND TENTS

Objector

Objection 453

Highways Agency

14.4.21. The Policy set out two criteria for the location of new sites for touring caravans and tents. The first was that they were well related to the major road network. The Highways Agency did not see the provision of access to such sites being made from the M25, or the A3. In the Council's view this was a matter for the application stage. However, if it is unlikely that access would be permitted from the two major roads that carry the most traffic passing through the Plan area, it would be helpful to prospective applicants to make this clear. An addition to Paragraph 14.22 could serve the purpose.

CHAPTER 14. RECOMMENDATION 8.

14.4.10. That the following be added to Paragraph 14.24:-

ACCESS TO NEW SITES WILL NOT BE PERMITTED FROM THE M25 MOTORWAY OR A3 TRUNK ROAD.

CHAPTER 15. COMMUNITY FACILITIES

1. INTRODUCTION

Objector

Objection 431

Royal Surrey County Hospital NHS Trust

15.1.1. Only one Objection related specifically to the Introduction, and that to Paragraph 15.2, which described the arrangements for health care in the Plan area. The Objection was that the Paragraph was not accurate, which the Council proposed to rectify by PC152.

CHAPTER 15. RECOMMENDATION 1.

15.1.1. That PC152 be made.

2. OBJECTIVES

3. SUPPORTING MEASURES

15.2.1. These sections of the Chapter attracted no specific Objections.

4. AVAILABILITY OF COMMUNITY FACILITIES

POLICY 99CF1 PROVISION OF NEW COMMUNITY FACILITIES

Objectors

Objection 226

Send Surgery

Objection 347

GOSE (CW)

Objection 524

Guildford Diocesan Board of Finance

Objections 1023,1068

Robert Shaw and Partners

Objections 1456-8

The Shepherdsmead Trust

Objection 1481

Mr R Stephens

Objection 1678

Country Landowners Association

Objection 1800

Mr A E Rees

Background, Objections and Issues

15.4.1. The Policy generally permits the provision of community facilities in urban areas and the identified settlements. The criteria cover the effect of development on the character and appearance of the building or its surroundings, accessibility and amenity. What is meant by "community facilities" or "community based facilities" is not explained and this was noted by some Objectors. A number of Objectors considered that there would be circumstances where community facilities could be satisfactorily provided outside the urban

areas, or the identified settlements. Various aspects of accessibility were also raised. The main issues were whether the Policy needed better definition or explanation.

Consideration

15.4.2. Paragraph 15.1 defines community facilities as those uses within Classes C2 and D1 of the Town and Country Planning Use Classes Order, which include a variety of publicly and privately provided facilities for education, health, welfare, social, community and recreational use. It was asked whether facilities for the local composting of green waste would be included, which in a land use sense they well might, but I agreed with the Council that they were better dealt with by the Waste Local Plan.

15.4.3. Various forms of nursing and care homes would be included, among them those for the elderly mentally infirm. The Policy is positive in its form and I would not see it as unnecessarily obstructive to the provision of such facilities. Policy 99CF5 relates specifically to the use of residential buildings for such uses. Churches and other places of worship would also come within its scope, where it is similarly encouraging. I did not see that specific policies were required for these activities, nor that there was a need to make relaxations in their favour in other Policies.

15.4.4. There was comment that the Policy prevented the provision of community facilities outside the urban area and the identified settlements. Examples raised were the provision of church and village halls and of medical surgeries, for which the only practical local sites might be on the edge of the village, but outside the defined settlement boundary. Another example was the possibility that larger country houses might lend themselves to providing care homes.

15.4.5. There was a suggestion that the Policy should not be restricted to the urban areas and the identified settlements, but to remove that restraint would allow development in the Green Belt that would not be "appropriate". That is not to say that rural houses and other buildings could not be used for community purposes, this being allowed for by Policies 99RE9, 99RE10 and Policy 99CF5. In other instances, such as the village hall on the edge of the settlement, if there were no alternative this might form the basis for an exception to be made to Green Belt or Countryside Beyond the Green Belt Policies.

15.4.6. I noted the related point that having acknowledged the changes in health care legislation and the likelihood that they would increase the need for community based facilities, the Plan made no proposals for this need to be met. A further Policy was proposed which would accept the use of sites outside settlement boundaries for the provision of health facilities, if there were no alternative, without the further necessity of making a case for an exception.

15.4.7. However, while there may be an argument for a strategy in the Plan to ensure that the necessary provision is made, and perhaps to look at settlement boundaries carefully if adjustments might meet the need, a Policy permitting development contrary to Green Belt policy could not be recommended, nor did it seem sensible to add words to the reasoned justification that might convey that implication.

15.4.8. GOSE asked that reference be made to accessibility to community facilities on foot and by bicycle, as well as by public transport. The Council proposed this addition in PC153. Mr Rees noted that places of worship are on occasion used for events such as weddings and funerals which attract large amounts of traffic. In new developments, I considered that Criterion 2 would cover that point, while the Plan would require parking standards to be met.

CHAPTER 15. RECOMMENDATION 2.

15.4.1. That PC153 be made.

POLICY 99CF2 LOSS OF COMMUNITY FACILITIES

Objectors

<i>Objection 623</i>	<i>MOD</i>
<i>Objection 1167</i>	<i>Action</i>
<i>Objection 1255</i>	<i>Ash Parish Council (CW)</i>
<i>Objection 1791</i>	<i>Consortium of Registered Social Landlords</i>

Background, Objections and Issues

15.4.9. The Policy seeks to retain community buildings, unless they are no longer needed. The need relates not just to an existing use, but to the potential for some other community use to occupy the building.

15.4.10. MOD considered that the Policy should reflect the circumstances where amenity considerations militated against the continuation of a community use. Action considered the Policy offered inadequate protection, particularly for community uses in the Town Centre. The Consortium saw the first priority for sites falling out of community use to be affordable housing. Ash Parish Council asked for it to be made clear that it was only in the circumstances given in the Policy that the loss of community facilities would be permitted, but were satisfied that this would be the case. The main issues were whether, or how, the Policy could accommodate the outstanding requirements.

Consideration

15.4.11. As noted above, the Policy permits the loss of a community facility only if there is no further need for that facility, and then seeks the reuse of the premises for further community facilities. The Policy does not allow amenity considerations as an argument to cease a use, or in relation to the installation of a new use. The Council argued that Policy 99G1(3) would apply, which I accept, as also might Policy 99CF1, but only in circumstances of a new use and a change which was not permitted by being in the same Use Class.

15.4.12. MOD no doubt also had in mind the situations which could arise in new developments where there might be existing community facilities which if retained in their

original location could be unnecessarily limiting on the layout of a site. This consideration could be addressed through the second criterion of the Policy, but I consider there is reason to take residential amenity into account in the Policy, as is done in Policy 99CF1. The Objectors suggested a further criterion and changes to the reasoned justification and I consider that these would be reasonably made.

15.4.13. As to whether the Policy should be strengthened in its protection of community facilities, the Policy is seeking retention where there is still an identified need and the location is appropriate. Other Policies also seek to retain uses that may be seen to serve the community, as Policy 99T2. I did not see that the Policy could in the circumstances be significantly strengthened.

15.4.14. There may be instances where affordable housing would be a suitable use for sites formerly in community use, but I consider that a stipulation that affordable housing be the alternative use would not be a reasonable one. Not all sites occupied by community facilities are in public ownership; the Policy covers a wide variety of uses and sites and in some cases residential would not be an appropriate use, or the one of most advantage to the area. It is to be preferred that this is left to the circumstances of the case, and other Policies of the Plan, rather than be set rigidly in this Policy.

CHAPTER 15. RECOMMENDATION 3.

15.4.2. That Policy 99CF2 be changed by the addition of a further criterion:-

OR 3. RETENTION OF COMMUNITY USE WOULD PREJUDICE THE AMENITY OF THE OCCUPIERS OF NEARBY PROPERTIES.

15.4.3. That the following changes be made to the reasoned justification:-

Add to the last sentence of Paragraph 15.9:-

AND WHETHER THE COMMUNITY USE WOULD ADVERSELY AFFECT THE AMENITIES OF NEARBY RESIDENTIAL PROPERTIES.

To Paragraph 15.10 after "OTHER" and before "COMMUNITY" add "SUITABLE".

Omit Paragraph 15.11.

5. EDUCATION

POLICY 99CF3 PRE-SCHOOL EDUCATION

Objector

Objection 348

GOSE

15.5.1. GOSE Objected to the second criterion of the Policy, concerned with access, parking and any increased traffic movements. It could be seen to be encouraging access by non-car modes and thus adding to motorised journeys. The Council accepted the point and agreed to omit the criterion, traffic and parking matters being in any case covered by the General Policies (PC154). I accepted this proposed change.

CHAPTER 15. RECOMMENDATION 4.

15.5.1. That PC154 be made.

POLICY 99CF4 EXPANSION OF SCHOOLS

Objectors

Objections 1484/5

Royal Grammar School

Objections 1487/8

The Governors of Tormead School

Objections 1490/1

Governors of the Royal Grammar School

Objections 1504/5

The Church School Foundation Ltd

Background, Objections and Issues

15.5.2. The Policy relates exclusively to the expansion of schools. It is permissive, but refers to proposals being in compliance with Policy 99R5, which would require them to take the least amount possible of the open space available within the school site. Other criteria related to effects on the character and appearance of the school and its surroundings, access and the accommodation of increased traffic. In addition, there is a requirement to introduce a transport plan "where appropriate". Paragraph 15.15 indicates that such a plan would be required in respect of only major development proposals which are likely to influence the type and volume of traffic.

15.5.3. The Objections to this Policy were closely related to those to Policy 99R5, the protection of open space, in so far as the inflexible application of that Policy could seriously hinder development necessary for the operation of schools, where their main buildings and their playing fields were on the same site. I have suggested a change to Criterion 5 of Policy 99R5 to make it more sympathetic to this need.

15.5.4. Also a source of Objection in relation to this Policy was the requirement for a transport plan to be agreed and to become binding on the school in question. The main issue in my view is whether the Policy is too onerous on schools.

Consideration

15.5.5. The Objectors suggested that, with the General Polices protecting important open land and the further protection given by Policy 99R5, the first Criterion of this Policy was not necessary. I have found the Plan to contain a number of Policies doing essentially the same job, in so far as the protection of open land is concerned, and have suggested some changes. If the change I have suggested to Criterion 5 of Policy 99R5 is accepted, the more onerous effects of the Policy on proposals for the necessary expansion of schools would be removed and Criterion 1 in this Policy would similarly be made less inflexible. I did not consider that an alternative wording that would refer directly to minimising the loss of open recreational land, or its usefulness for formal games, was required.

15.5.6. The Objections relating to the requirement for a transport plan appeared to refer to a less than edifying experience of one school when seeking to properly implement such a plan. In those circumstances the imposition of conditions or the seeking of agreements seemed to the Objectors to be unreasonable. However, the tests of reasonableness and appropriateness would need to be applied to any conditions imposed and any agreements sought would necessarily be entered into voluntarily. Where a school extension was likely to result in a substantial increase in traffic it appeared appropriate in the interests of sustainability as well as traffic management to keep this requirement in the Policy, but to modify the reasoned justification. A revision of Paragraph 15.15 is included in the recommendation.

15.5.7. There were criticisms of the tentative wording of Paragraph 15.14 in describing the relationship of the Council to schools in assessing and ensuring adequate provision. This is essentially an editorial matter, although it is a point worth considering. A further suggestion removed reference to "protected open space", but I considered it would be preferable to keep a reference, perhaps as "significant areas of school playing fields".

15.5.8. I visited the schools of the Objectors, noting that they were for the most part well within the urban area of Guildford and the value to the schools and their neighbourhoods of their open space. Their needs for new or expanded teaching facilities were also explained to me. I have not felt that the schools need to be described, or considered individually, the key to their problems being in the terms of the Policies.

CHAPTER 15. RECOMMENDATION 5.

15.5.2. That in Paragraph 15.14, third sentence, for "PROTECTED OPEN SPACE" be substituted "SIGNIFICANT AREAS OF SCHOOL PLAYING FIELDS".

15.5.3. That Paragraph 15.15 be changed as follows:-

WHERE MAJOR EXPANSION IS PROPOSED WHICH IS LIKELY TO SIGNIFICANTLY INCREASE THE VOLUME OR CHANGE THE TYPE OF TRAFFIC GENERATED BY THE SCHOOL OR COLLEGE, THE COUNCIL WILL EXPECT A TRANSPORT PLAN TO CONTROL TRAFFIC MOVEMENTS TO BE PREPARED. WHERE APPROPRIATE, A PLANNING CONDITION MAY BE IMPOSED OR A SECTION 106 AGREEMENT SOUGHT. PROPOSALS FOR EXTENSIONS UNLIKELY TO INCREASE TRAFFIC MOVEMENTS SIGNIFICANTLY WILL NOT BE EXPECTED TO PROVIDE TRANSPORT PLANS.

6. CARE IN THE COMMUNITY

POLICY 99CF5 CARE IN THE COMMUNITY

Objectors

Objections 514, C25

St Catherine's Village Association

Objection 1022

Robert Shaw and Partners

Objection 1792, 2036

Consortium of Registered Social Landlords

Background, Objections and Issues

15.6.1. The policy relates to the change of use of existing dwellings for care homes, including nursing homes, homes for the elderly and rehabilitation homes. It is considered that most of the provision is likely to come through the adaptation of larger dwellings, the Policy providing guidance and control through three criteria, the size of the building, the effect on the character of the building and the amenity of neighbours and satisfactory access and parking.

15.6.2. The Objections, on the one hand, were concerned that the Policy did not contain sufficient safeguards for the surrounding area, and, on the other, that there should be provision in the Policy for buildings to be extended as a part of conversion. Levels of parking provided should be those considered necessary by the applicant, unless there were particular road safety considerations.

15.6.3. The Council proposed several changes to the Policy as a result of the Objections, all in PC156. The stipulation that the property was to be detached was proposed to be removed. The third criterion dealing with access and parking matters was also proposed to be removed, this matter being dealt with by the General Policies. The issues outstanding were whether further changes were needed to strengthen, or add flexibility to the Policy.

Consideration

15.6.4. It can be accepted that there can be adverse effects on the character and amenity of a residential area from the conversion of dwellings to care homes, but it appeared

to me that the Policy was taking the main issues in this respect into account. The Policy requires that the building and its curtilage should be of adequate size to properly accommodate the use without the impact of its parking and other servicing impinging seriously on the surrounding area. The Council was right to see that a house need not be detached, but where properties proposed for conversion are terraced or semi-detached it could be more difficult to achieve a satisfactory adaptation to the new use. This is well explained in the reasoned justification.

15.6.5. The Policy does not preclude the extensions or alterations which will often be necessary to convert a building for a care home use, although again the requirement is to maintain the character and amenity of the area. I did not see that the Policy should be specific about extension or alteration and considered that the reasoned justification said enough. It would be likely that the more spacious the curtilage, the easier it would be to accommodate extension satisfactorily. It can be noted that the Policy does not confine changes of use to dwellings in the urban areas and identified settlements.

15.6.6. While the parking needs of different sorts of care homes may vary and for some there will be less need than others, I accepted the view of the Council that the parking standards of the Plan should apply in general. If individual proposals produced greater or smaller needs, this could be examined when the application was considered. The St Catherine's Village Association in their Counter Objection considered that the removal of Criterion 3 would weaken the Policy, but the same ground is covered by the General Policies and it is not necessary for it to be repeated here.

CHAPTER 15. RECOMMENDATION 6.

15.6.1. That PC156 be made.

CHAPTER 16. UNIVERSITY OF SURREY

PROPOSAL 99U1 UNIVERSITY OF SURREY

Objectors

The objections to the Policy are listed in the Annex.

1. INTRODUCTION

16.1.1. There were some 180 Objections to the Proposal and its reasoned justification. In addition, more than 80 representations were made in support. The Objectors included the University of Surrey itself (henceforth referred to as "the University"), whose concerns were mainly with the detail of the Plan's content. The Council put forward a number of Proposed Changes, as a result of which several of these Objections were conditionally withdrawn. The Council prepared a Topic Paper (CD19), but much of the background to the Proposal was included in the Plan itself. A considerable body of information and comment was, in addition, provided by the University and I was also grateful to those Objectors who provided detailed support for their Objections, among them Broadway Malyan, who represented Beazer Strategic Land, and CPRE.

2. BACKGROUND TO THE PROPOSAL

(a) The History of the University in Guildford

16.2.2. The University came to Guildford in the later 1960s with support and encouragement from the Council and Surrey County Council. Outline planning permission was granted in 1965 for the Stag Hill site, now the main campus of the University, situated between the town centre and the Cathedral, and for nearby Manor Farm to the west of the Guildford Bypass (A3). The Stag Hill site was of about 33ha, the Manor Farm site of some 115ha. Some parts of the Manor Farm site, principally on the northern fringe, have subsequently been developed for the Royal Surrey County Hospital, the Surrey Research Park and, on the eastern side, a Post House Hotel abutting the A3, together taking about 41ha. A further area has been developed for the Human Psychopharmacology Research Unit. The remainder provides sports facilities for the University, mainly playing pitches, or is farmland.

(b) Stated Need for University Expansion

16.2.3. The University has developed as a medium sized research based university leaning towards science (including medicine), engineering, technology and the applied human sciences. It has operated largely from the Stag Hill campus, on which teaching and research has been combined with the provision of student residential accommodation. There are now some 8500 full time equivalent students (FTE), but whereas in its early years the University provided accommodation on the campus for about 60% of its students, that proportion has now fallen to about 35%.

16.2.4. The University anticipated that in the next twenty years student numbers will be likely to increase to about 12,500 FTE. This will require some expansion, but, in addition, to maintain its position in the academic and research fields, new facilities will be needed. To bid successfully for funds it had to be shown that land can be made available without serious planning impediments. There will be similar needs to increase student residential accommodation, with the aim of returning the proportion resident to about 60%, and providing for academic staff, particularly at the more junior levels.

(c) Extent of development required

16.2.5. In terms of floorspace in new buildings the University considered that the total requirement was for some 150,000sqm for academic use and a further 130,000sqm for student and staff residences. At 40% site cover, 25ha would be required for this and a minimum of 15ha for sport and recreational facilities. This was suggested as the requirement to 2020. In the first five years it was estimated that 35,000sqm of new academic buildings would be required and 1000 new student residences, in all taking about 7ha of land. Five hectares of land would be required for additional playing fields in the same period. In the following five years a further 10ha would be required for built development, and, in the 10-20 year period, 18ha for academic and recreational uses, giving the total of 40ha.

(d) The Manor Farm site

16.2.6. The area containing Manor Farm is to the west of Guildford and broadly located between the Guildford-Reading railway to the north and the Guildford Bypass (A3) to the south. The area adjoining the railway now encompasses the Surrey Research Park, the Royal Surrey Hospital and a Tesco Superstore, together with an older residential area in Ashended Road and Beech Grove. Beyond the railway is the residential area of Park Barn. To the south of the A3 development is predominantly residential. Two areas of development extend to the north of the A3, the Hotel mentioned earlier and a ribbon of houses in Beechcroft Drive.

16.2.7. Manor Farm is predominantly open land to the south of the Research Park and Hospital extending to the A3 and Beechcroft Drive and lapping round the Hotel. The northern part is the Philip Henman Sports Ground, the main sports complex of the University, comprising a variety of sports pitches and ancillary buildings. Manor Farm itself and some adjacent cottages are towards the western side, surrounded by land that has remained in agricultural use. To the west, the designated area is bounded by Manor Copse and further farmland forming part of Blackwell Farm, also owned by the University.

16.2.8. In structural terms, the site forms a tongue of open land extending into the built up area of Guildford from the west. This is emphasised by its situation at the foot of the Hogs Back, which rises sharply to the south, and by the lesser rise to Park Barn. The A3, descending from the Hogs Back into Guildford, affords a broad view of the site and the north western part of the town. The Hogs Back itself and vantage points in Onslow Village also afford views across the land. The lower eminences of Park Barn give less sweeping views, although the prominence of the southern part of the site as it rises towards the Hogs Back is apparent.

16.2.9. Adjacent to Manor Farm itself is the moated site of the former Royal Guildford Manor, a scheduled Ancient Monument.

(e) Proposals of the Plan

16.2.10. The Chapter had as its objectives:-

- (i) To assist the continued growth of the University within an agreed planning framework; and
- (ii) To facilitate the future expansion of the University by providing a site for a campus at Manor Farm.

The Chapter sets out in some detail the background to the University's present stage of development and what the University sees to be its needs for the future. It continues through the analysis that has led to the conclusion that Manor Farm is the best location for the expansion of the University to a Proposal, the only one of the Chapter. The Plan defines an area at Manor Farm in which University related development can take place, removing the Green Belt notation from this and some small incidental areas and setting out the requirements to be met for the development to proceed. The University's plans for the expansion not having reached a stage at which a detailed scheme of development is available, the requirements of the Proposal are for details of the development, its phasing, the environmental effects and the traffic implications to be approved before development can take place.

16.2.11. The area of Manor Farm included in Proposal 99U1 is some 75ha, the balance not required for actual building being proposed for open uses, among which would be space for sport and recreation (including replacement of the playing fields that would be lost to building), landscaping and possibly agricultural use. An illustrative zoning plan was provided to the Inquiry by the University (the Council's officers seeing it as broadly what they had expected, although stressing that it had not at that time been seen by elected members or received the agreement of the Council). This plan indicated that new development would be concentrated mainly in the north eastern sector of the land, mostly the present University sports fields, with extensions along the northern boundary to Manor Copse and along parts of the boundary with the A3.

16.2.12. The area shown for the Proposal on the Proposals Map includes a triangular area of 1.2ha owned by the Royal Surrey County Hospital. PC232 proposed its removal from Proposal 99U1. It was not proposed to maintain the Green Belt notation for land that would be detached from the remainder of the Green Belt, such as this land which would eventually become surrounded by University development. Like the Hotel and land in Beechcroft Drive from which the Green Belt notation would also be removed it would be included in the Guildford urban area, without a specific allocation. The total area of land to be removed from the Green belt would be about 84ha.

3. OBJECTIONS AND MAIN ISSUES

16.3.1. The Objectors were almost unanimous in their support for the University and sympathetic to its needs for the future. Against this, there was support for retaining Manor Farm in the Green Belt and doubts were raised as to the scale of the needs and whether they could be met other than by taking a greenfield site in the Green Belt for the purpose. There were also concerns about the timing of including the Proposal in the Plan, transportation issues and a number of more site specific landscape and environmental matters, where again many saw the absence of details as a handicap in assessing the merits of the proposal and defining an area from which the Green Belt was to be removed. These I saw to be the main issues for consideration.

4. THE NEED FOR EXPANSION

16.4.1. The 1965 planning permission envisaged that the development of the University would take place over a long period. The Minister's decision letter stated that "it would be thirty years before the whole of the farm land would be required". At the present, having regard to its master plan, the Stag Hill site has been almost fully developed. Significant further development could only be at the expense of the open space within this campus, but, even if this open land were to be taken, not only would there be serious disadvantages to the appearance and amenity of Stag Hill, the anticipated needs for future expansion seen by the University could still not be met.

16.4.2. These needs spring in part from the organic growth of a successful University. More than that, there is a recognised National need to expand education. The Report of the National Committee of Inquiry into Higher Education (Higher Education in the learning society, the Dearing Report, July 1997) said in its opening paragraph "In the next century, the economically successful nations will be those which become learning societies: where all are committed, through effective education and training, to lifelong learning". The Government has made it clear that it expects the Universities to play a greater part in securing economic development for the future, and this is also an expectation of society at large.

16.4.3. Some Objectors considered that it was not possible for the University to predict its needs so far into the future and that it would be better to look to a 10 year period. The release of land from the Green Belt could then be phased to match the stages of development. It appeared, however, essential for the University to look to the longer period for the formulation of its plans. As to the Green Belt, the guidance suggests that in reviewing Green Belt boundaries a longer time scale should be used than for other aspects of the Plan. If the normal period suggested for a local plan is ten years, it is not unreasonable to look at defining the Green Belt boundary with two local plan periods in mind. A cushion of undesignated land for future requirements, where they are reasonably foreseeable, can be accepted where it would avoid a succession of bites at the Green Belt.

5. ALTERNATIVES TO DEVELOPMENT AT MANOR FARM

16.5.1. Many Objectors suggested that it would be possible to accommodate the University's needs without further development at Manor Farm. One line of argument drew attention to the possibility that the University's existing accommodation could be used more intensively - for example, by extending the academic year, or including a fourth term - or

more effectively by removing non-University uses from the campus, notably the Examination Board and the BBC Radio Station. It was suggested that redevelopment on the Stag Hill Campus to give greater and more efficient space should also be considered, as should use of vacant sites on the Research Park, or the Research Park as a whole, for University purposes. Distance learning was a growing force that could bring about a further reduction in the need to build University accommodation.

16.5.2. The University had considered these possibilities, and was developing ideas for the greater use of existing space and the further expansion of distance learning. The two non-University uses mentioned were seen to have incidental advantages for the University, and to occupy relatively little space. Even taking the trends in education into account, the need for more space remained and the requirements took account of the reductions that could flow from these changes. The second line of argument was that alternative sites, many brownfield rather than green, were available to accommodate the University's expansion and these should be fully evaluated before Manor Farm were released.

16.5.3. In an exercise to test this proposition, the Council identified 33 possible sites which might serve the University's needs in substitution for Manor Farm. Their suitability was examined by consultants on behalf of the University (Alternative Sites Report, CD62). Among those considered were the sites identified for development in the Plan for other specific purposes, including those in close proximity to the Stag Hill Campus, such as the land at Guildford Railway Station and the Farnham Road Hospital and, at a greater distance, the largest of the sites identified for development in the Plan, the Queen Elizabeth Barracks and Chart Depot. The possibility of reclaiming the Research Park was not among the options considered, and while owned by the University, I could accept that the displacement of the firms at present established there could be damaging to the University's work as well as its finances, but, more significantly, probably not practical other than in the longer term.

16.5.4. The consultants' conclusions, having considered the sites separately and together, was that there was no more suitable site than Manor Farm in Guildford or its environs in terms of size and its relationship to the main campus, while a multi-site option would require the use of so much of the land likely to be available in the town to accommodate the University's needs it would be a very uncertain and expensive option, even if it were practicable and a reasonable use of the available development land. The University supported the consultants' conclusions, also seeing difficulties in financing the alternative options, but, most significantly from their point of view, that they could not meet the ambition to both expand the University and maintain the advantages of a campus University. The Council accepted the conclusions and, in my view, the concentration of development in as close proximity as possible to the present centre of the University is to be preferred over the alternatives, if it can be achieved in reasonable balance with other important planning objectives.

6. GREEN BELT ISSUES

16.6.1. When the outline permission was granted in 1965 the land was beyond the boundary of the Metropolitan Green Belt. In the adopted plan the whole of the designated site, together with the Hotel and an area of land at the western end of Beechcroft Drive are in the Green Belt as currently defined. Policy as it now stands would not see the University's proposals as appropriate development in the Green Belt. It appeared that the Green Belt notation was only extended to this land by the 1987 local plan. At that time the University and the Council did not see this as prejudicial to the future plans of the University, because "institutions standing in extensive grounds" were seen as an appropriate use in the Green Belt.

16.6.2. The current edition of PPG2 (January 1995) removed this concession from Green Belt policy and the continuing validity of the 1965 permission was clearly in doubt. The University was faced with the situation that once a Green Belt is established, the advice is that the boundaries of the Green Belt should only be altered in exceptional circumstances, after the opportunities for accommodating the development in the urban areas or beyond the Green Belt have been considered. Alterations may be made when local plans are revised, but there is the expectation that this will have first been approved in the Structure Plan, "or other exceptional circumstances exist, which necessitate such a revision".

16.6.3. The Council saw three reasons for considering that there were exceptional circumstances. The first related to the needs of the University to grow to help in the fulfilment of National aspirations for higher education and to adequately perform the role for which it was chartered. The second was that the development of Manor Farm was envisaged when the permission for the University was given in 1965. The third was the absence of suitable alternatives to development at Manor Farm.

16.6.4. There were views that these were not the sorts of exceptional circumstances the advice had in mind, or not exceptional in themselves and were the points that might be argued by any developer in favour of a Green Belt site. However, I saw no reason to disagree with the Council's view that the University should be looked at as a special case, their view as to what should be considered exceptional circumstances, or the conclusions as to their weight. The original grant of outline permission in 1965 was indicative of an intention that Manor Farm should be available for the future development of the University. The extension of the Green Belt to the land had been on the understanding that the policy as it then stood would permit development by the University. Whether the development in mind then was of the scale of what is now envisaged I was uncertain, but I did not see that as departing from the assumption that this land would be available for the long term growth of the University. Currently, the thrust of Government policy for education, on top of what can be seen as its natural growth, required the University to look seriously towards expansion. This land, after a consideration of alternatives, remained what it had been seen to be 35 years ago, the best place for that further growth to take place.

16.6.5. The approved (1994) Structure Plan recognised as an issue the long term proposals of the University for Manor Farm. It was seen as perhaps being acceptable under the policy current at the time - as an institution in large grounds - although the possible impact of development on the scale envisaged on the Green Belt was noted. A working

group was set up and the Consultative Draft for the First Alteration of the Structure Plan (October 1997) was supportive of the proposal, subject to four matters being satisfied - need, a lack of suitable alternative sites within the urban area, approval of a phased master plan and a transportation plan to meet the sustainable transport strategy. This appeared to be indicative of the County Council's considered view of the University's proposals as justifying a change to the Green Belt boundary, although this Review has since languished. Like the Council, I am doubtful that it should now be accorded much weight, but the decision matters to be satisfied remained relevant to the consideration of the Proposal and are among the issues I have identified. More recently, and directly in relation to the Plan, the County Council has given the appropriate statement of general conformity, indicating that the Plan is not considered to conflict with the Structure Plan.

16.6.6. I was prepared to accept that in withdrawing the Green Belt notation, the procedures set out in PPG2 had been followed in the spirit; that they had not been followed in the letter was largely the result of the delay in progressing the First Alteration of the Structure Plan. While this did remove a stage in which the public and local groups could have been involved, the consultation on and the Examination in Public of the First Alteration, there had been an opportunity for public involvement in the formulation and the Inquiry into the Plan. The planning application process, linked to the requirements of the Proposal, would ensure that there were further opportunities to comment on the significant matters that cannot be finalised now and on the more detailed plans as they emerged.

16.6.7. There was a view shared by some Objectors that the University's plans for growth did not have an urgency that, even if they justified a change to the Green Belt boundary, required the alteration to the Green Belt boundary to be made at this time. It was suggested that they could await the approval of the First Review of the Structure Plan and, if agreed at that stage, be incorporated in the next review of the local plan. However, space on the Stag Hill Campus having now been largely used up, the locations of future development need to be certain and free from serious planning difficulties if they were to be funded and developed to the time scale the University required. I was uncertain how long the Review of the Structure Plan and then of the local plan would take, although I could see that at best it would be several years behind the adoption of the Plan and if there were no substantial reason to do so the University's needs should not be unduly delayed. I saw there to be justification for rolling back the Green Belt from Manor Farm to accommodate the University's needs for the next 20 years now, at least in so far as they were explained to me at the Inquiry.

16.6.8. Having said that, there was a further matters of concern raised by Objectors, whether in the light of what was said of the University's intentions, it was necessary, or desirable, to remove the whole of the area defined in the Plan from the Green Belt. The concerns were that, either development would be dispersed in isolated parcels across much of the area, or, having removed the Green Belt notation, land not required by the University would be available for other forms of development, notably housing or extension of the Research Park. The first alternative might or might not be satisfactory in terms of the movement objectives. It might also have considerable landscape implications if it were to intrude significant building into the western and southern parts of the site.

16.6.9. The illustrative zoning plan was reassuring in so far as it confined the areas proposed for development to the north eastern part of the site, the slopes below the A3 and land spreading from the development adjoining the north western edge of the site along the side of Manor Copse to the vicinity of the Manor Farm buildings. These are the areas of least sensitivity in terms of their landscape significance, with the exception of the land along the A3, which while concealed by the form of the land from the A3 and the Hogs Back, is more open to view from the north. The zoning plan did not propose development on the central area of the site, or to the south west of Manor Farm itself.

16.6.10. The new boundary drawn for the Green Belt by the Plan would follow an identifiable boundary and be in itself satisfactory, but the zoning plan suggested that there would be significant areas not built on. There were a number of Objectors who considered that this land should remain in the Green Belt. The boundary might be drawn to allow Manor Farm itself and the land to the west to remain in the Green Belt. This would avoid the necessity to remove land at the western end of Beechcroft Drive as an incidental adjustment. This was suggested in Alternative 3 put forward by Ms Rowland on behalf of Beazer Strategic Land. I noted also her suggested Alternative 2, which appeared to me to offer quite considerable landscape advantages, if development suggested on the slopes leading up to the A3 were relocated on the lower land.

16.6.11. The Proposal as drafted allocates the land only for University use. The Proposal requires the preparation of an agreed master plan and development brief, showing also the phasing of the development. I had no reason to think that other forms of development were intended, although government pressures on Universities to raise money where they can was an understandable concern to some Objectors. The Proposal requires an environmental appraisal and refers to safeguarding the areas of higher quality agricultural land as well as the trees and hedges and other natural and historic features.

7. AGLV

16.7.1. As well as Green Belt, the site is within the defined area of the AGLV. At its south western corner it shares a boundary with the AONB. The AGLV, a County-wide designation springing from the Structure Plan, was first designated in 1983. It is not a designation that precludes development, although conservation of the landscape character is the primary objective. The Plan proposes removing the site from the designation, the Council considering that the Proposal is likely to change the character of Manor Farm to an extent that would differentiate it from the countryside remaining to the west.

16.7.2. While the site is widely overlooked, from most vantage points the views are limited by the local relief and vegetation. Around the northern side the closely adjoining built up area is apparent. In the general landscape the open land towards the centre of the site is of most significance, providing continuity with the countryside to the west and carrying open land into the built up area of the town.

16.7.3. The zoning plan suggested that the building would be concentrated mainly adjacent to the already developed boundaries and against the woodland of Manor Copse. The

central and western parts of the site would remain in open uses, maintaining the link with the countryside to the west and a tongue of open land extending into the built up area.

16.7.4. I agreed with the Council that the Proposal would bring about changes to the character of the site that would suggest removal of the AGLV notation from much if not all of the land. The zoning plan coloured in a rather larger area than would need to be wholly occupied by buildings and at the later detailed stages it would be possible to do more to retain an amount of land that could be of landscape significance in the central parts of the site and perhaps to reduce the extent, or certainly the impact, of development along the A3. The spread of sports pitches to land that is not naturally flat is likely to require some levelling and this will be important to consider at the detailed stages.

16.7.5. There was the suggestion that the limit for development, and the boundary of the AGLV, should be the 90m contour, a line not very different from Ms Rowland's Alternative 3. As with the Green Belt, whether there would be justification for keeping the western part of the land to the south and to the west of Manor Farm itself, broadly the land above the 90m contour, in the designation would depend on a more detailed scheme in which landscape matters could be properly considered. A Proposed Change added to the second requirement that "views from the AONB and elsewhere in the AGLV" to the matters to be safeguarded.

8. OTHER SITE SPECIFIC MATTERS

(c) Agricultural land

16.8.1. A part of Manor Farm has land classified as among the best and most versatile (Grades 1,2 and 3a). The Proposal takes note of this in requiring it to be safeguarded. This would imply that it should not be built upon, although open uses might be permitted. The Illustrative Zoning Plan did not show land retained in agricultural use, although this should be among the possibilities considered under this requirement, particularly in the earlier phases of development. MAFF, taking note of the terms of the Proposal, did not object.

(c) Nature Conservation

16.8.2. There are no designated sites for nature conservation in the Proposal site. That is not to say that it is without interest in this regard, much of it being farmland with hedges, ditches and wooded areas. The site also represents a cross section of geological types to the north of the Hogs Back, adding to the interest and variety of its wild life. Objectors pointed out its value as a habitat for many plants, birds, animals and invertebrates. The Proposal requires an environmental appraisal and the formulation of appropriate safeguarding measures.

(d) Access

16.8.3. The site is crossed by one public footpath, while the public is allowed access to the track from Beechcroft Drive to Manor Farm and beyond to the public footpath. The University anticipated that much greater public access would become available as the

development proceeded. Mention was made of the possibilities of using land at Blackwell Farm and on the western part of Manor Farm for a country park or other informal recreation.

(e) Affects on amenity

16.8.4. There were understandable concerns that substantial development could affect the amenity of those living in or occupying buildings in the vicinity. The Proposal takes this into account. Very few houses adjoin the site, most notably those in Beechcroft Drive. The Illustrative Zoning Plan does not suggest that there would be built development in their vicinity. Other activities on the boundaries of development such as the Hotel and the Hospital would need to be considered at a more detailed stage, when the precise location, height and uses of buildings are known. The other factor to be of concern is traffic, which is considered below. It is to my mind appropriate to include amenity among the requirements of the Proposal, to allow these aspects of development to be considered by those who could possibly be affected.

9. TRANSPORTATION MATTERS

16.9.1. The Stag Hill Campus is very close to Guildford Town Centre with good access to the railway station and bus services. It was said that the opportunity would be taken to integrate existing and new development at Manor Farm with Stag Hill, by the organisation of the activities of the University to reduce internal travel and the provision of pedestrian, cycle and bus routes on a transportation spine linking Manor Farm, Stag Hill and the Town Centre.

16.9.2. The adoption of a long term transport plan, approved by the Council, is one of the requirements of the Proposal. This is to ensure that there is no significant increase in car based movement and to achieve agreed targets for modal choice and meeting of sustainable development objectives. PPG13 recognises that Universities provide particular opportunities for the sustainable location of facilities. The advice suggested that the potential of urban locations should be maximised and accommodation provide with ready access to the University site. It was stressed that as well as other advantages, the principle of concentrating the growth of the University in a further campus close to the first offered the best opportunities for achieving a sustainable outcome. Nevertheless, the traffic implications of the proposals were a clear concern to many of the Objectors, as well as to the Council and the highway authorities, the County Council and the Highways Agency, responsible for the A3 Trunk Road. An agreed statement was put to the Inquiry by the Highways Agency, Surrey County Council and the University which sought to provide a basis for meeting the concerns and contained many of the matters mentioned below.

16.9.3. The University appointed consultants to undertake a Strategic Transport Study in which the transport requirements and impacts over the relatively long time scale of the proposals would be examined. The absence of a detailed master plan for the development envisaged did not allow a transport assessment of the sort that might be expected of a more closely defined development. The Study did, however, allow an assessment of the likely impacts and of the measures that would be required.

16.9.4. A key element of the University's proposals, and an important factor in reducing the needs for travel, is the provision on the campuses of a significant amount of residential accommodation for students and staff. The student accommodation now at Hazel Farm may be replaced on Manor Farm. The residential accommodation will generate traffic to and from the site, although to counter this there will be a reduction in journeys by students to reach the University. Similarly, the teaching and research activities would generate traffic, although the increase in the proportion of students and staff resident on site would decrease the net growth. The principal traffic growth was expected to be concentrated on the link between Manor Farm and Stag Hill, rather than distributed more widely.

16.9.5. The principal access to the site from the A3 and the Stag Hill Campus is the roundabout immediately to the west of the A3 (the Tesco roundabout). This roundabout and other elements of the local road network, are likely to be operating above their normal capacity before the development of Manor Farm is commenced. It was noted that there is still some further development to take place on the Research Park. The impact of the proposals on the Cathedral roundabout would be likely to leave that, too, operating at above its capacity. The Plan mentions the possibility of establishing a Park and Ride scheme sited at Manor Farm. This is not a proposal of the Plan, and should it be provided it would raise a further traffic consideration, although its bus services could reinforce the public transport spine proposed to link the two parts of the campus and the Town Centre. The wider impact of the University proposals on other routes, including the A3 and routes through the Park Barn Estate, were assessed by the Study as unlikely to be significant.

16.9.6. To provide for movement between the new and old campuses there would be footpath and cycleway links between Manor Farm and Stag Hill. The existing University bus service would be extended and enhanced, as would public bus services. Other possible improvements to local public transport could include the opening of a railway halt at Park Barn and the provision of a light rail link between and through the campuses. It was considered that adequate provision could be made to improve the Tesco roundabout and the A3 slip road to accommodate the increased traffic loadings, including the Park and Ride facility site, if provided, and to prevent the danger of traffic tailing back onto the A3 at the morning peak.

16.9.7. The movement solutions for the University would need to be part of the integrated transport management policy for Guildford as a whole, as the Plan stated. By way of resume, the Council and the highway authorities were satisfied that a sustainable solution to the movement implications of the Proposal could be found and that to this end the University would, and could, if need be in conjunction with the authorities,

- confine the increase in traffic generation from the Manor Farm site to no more than 5%;
- expand the Green Travel Plan at present covering the Stag Hill campus to cover the existing and proposed development at Manor Farm;
- introduce a Green Travel Plan for the Surrey Research Park and restrain future parking provision on the Park;
- undertake a traffic assessment for each phase of development and implement the required infrastructure improvements;

- seek a resolution to the traffic problems at the access to Beechcroft Drive from the A3;
- assess the need and fund extension or alteration of on street parking controls within walking distance of the Stag Hill and Manor Farm campuses and the Research Park.

16.9.8. Some Objectors considered that it was not possible to assess the movement implications of the Proposal until more details were known of the development proposed. I would accept the truth of that, but at this stage of the process it is important to fix the parameters of traffic growth. The ceiling agreed for traffic increases would place bounds on what might occur and allow the implications of this level of increase to be assessed and planned for. To keep within this ceiling it will be necessary to implement the other measures for substituting non-car modes and restraining car use for access and movement about the campuses.

16.9.9. The objective set by the Agreement of confining increases in traffic generation from Manor Farm to 5% is undeniably challenging. There seemed no real precedents by which its reality could be judged. However, the objectives of National as well as local policy are to restrain growth in traffic and the use of the car. If it is too soon to say how effective general restraint will be, in the longer term covered by the University's proposals a significant effect should have become apparent. Also on the positive side, the control the University has on the management of the sites, the return to a substantial provision of accommodation for students and staff and the concentration of the principal activities of the University on the Stag Hill and Manor Farm sites will be important factors in restraining traffic growth, while the overall proposals for movement in Guildford will, it is to be hoped, contribute significantly to the realisation of an acceptable movement solution. As a safeguard, it is implicit in the agreement that if the 5% ceiling can not be achieved, the scale of development would also need to be limited.

16.9.10. Congestion on the A3 arising from the proposals was a concern to many, and raised reservations from the Highways Agency. This, in the circumstances foreseen in the previous paragraph, appeared to come down to the likelihood of traffic increases on the A3 being of very small proportions. The dangers of peak hour tailbacks onto the A3, adding to the congestion and hazard on this route, appeared capable of an engineering solution. An amenity and convenience consideration for local residents as well as a traffic matter that is covered by the Agreement is the prevention of parking connected with the University once restrained on the campuses spreading outwards into neighbouring residential areas.

16.9.11. Residents of Park Barn were concerned that there would be increased traffic in the Estate roads and an increased incidence of rat running. The Study predicted no very great increase in traffic through the Estate, but there was an acceptance that this would need to be monitored.

10. CONCLUSIONS

16.10.1. Having regard to the issues identified earlier, I was satisfied that there was a requirement for the University to continue to expand and that the amount of further

development likely to be required had been assessed with reasonable accuracy. There was in the further development of the University an urgency which justified tackling the planning situation in the Plan, rather than waiting until what in practice would be likely to be the next Review. The procedures for altering the Green Belt boundary through the Structure Plan and by the consideration of this as an exceptional case had been reasonably met. It was apparent that, taking the different considerations together, not least those of achieving a sustainable outcome, there was no more satisfactory alternative than Manor Farm for this expansion to take place.

16.10.2. There was at the Inquiry a little more information as to the general form and distribution of the development envisaged than had been available to the Council when drawing up the Proposal. Nevertheless, it is appropriate that the Proposal and its reasoned justification are worded carefully to cover a situation in which the University's needs are still to be determined in detail. The Proposal anticipates the detail of the scheme being subject to full examination through the development control processes, when many of the concerns of Objectors would be taken into account. It may be that, as many Objectors felt, the Proposal is being overgenerous in the amount of land that is being taken out of the Green Belt and that this could be cut back. I had sympathy with this view. The western part of the land appeared to be intended for open uses with no very great changes to its character. However, I saw that it might not be possible to fine tune the boundary in the period up to adoption of the Plan. I considered that the option should, nevertheless, be kept open to retain the western part of the site in the Green Belt and AGLV, perhaps by overlapping the Proposal 99U1 designation, if this could be done with certainty before the Plan were adopted.

16.10.3. There was acceptance that expansion of the University would have implications for employment and housing in the Plan area, not from the University alone but from the broader effects it would have on the local economy. They will generate a demand for workers and for housing, as would any other significant increase in employment. The Council considered that much of the additional demand for ancillary and support staff could be met from the local population without leading to significant increases in the demand for housing. I was less certain of that. The proposals to build a substantial amount of student and staff accommodation will certainly reduce the impact on the local housing market. The phasing of development did not suggest that there would be a significant effect in the Plan period. In the longer term I consider that there is likely to be an a requirement to be reflected in the housing targets set for future Plans. In an area where the labour and housing supply situations are already constrained the changes arising from what is a substantial development would need to be monitored closely.

16.10.4. A number of changes were proposed by the Council to the Proposal and the reasoned justification. In the Proposal these included removal of Requirement 5, the pursuit of energy efficiency (PC162), a matter dealt with under other legislation, an addition to Requirement 2 (mentioned above, unnumbered) and alteration of the area shown under the Policy on the Proposals Map by the exclusion of the Hospital land (PC232).

16.10.5. Some further changes require consideration. The Proposal refers to taking out of the Green Belt land shown on the Proposals Map, although only the area designated for Proposal 99U1 is defined on the Proposals Map. Three further areas are also removed from

the Green Belt, the Hospital land, the Hotel and land at the western end of Beechcroft Drive. In so far as these relatively small parcels would be isolated from the Green Belt by the Proposal 99U1 notation this is a logical thing to do. However, the Proposal needs to identify these areas also, which might be easily achieved by giving the Proposal 99U1 land and these parcels a common boundary, the colouring being confined to the University land. The reasoned justification could name the three parcels, indicating that they are included in the urban area and giving an indication of their intended future. For the Hospital land this could include an indication that the land is expected to be used for the purposes of the Hospital. For the Beechcroft Drive land, bearing in mind its position and the difficulties of access, an indication should be given as to whether residential development would be acceptable as a result of the change. If it were, consideration should be given to designating the site under Policy 99H2.

16.10.6. Changes to the reasoned justification included an addition to Paragraph 16.1 (PC157), a change to Paragraph 16.3 (PC158) and an alteration and addition to Paragraph 16.4 (PC159). In Paragraph 16.13 a change (PC160) and an addition was proposed to deal with the changes to the AGLV (PC162). The exceptional circumstances of the Proposal were added to Paragraph 16.15 (PC161). Further changes I suggest are (i) the substitution of 84 hectares for the 75 hectares of the first sentence of Paragraph 16.18, (ii) recognition of the strategic housing and employment issues that will arise from the Proposal and (iii) an addition to take in the key matters in the Agreed Statement on Traffic, Transport and Access Issues.

CHAPTER 16. RECOMMENDATION 1.

- 16.1. That PC162 be made.
- 16.2. That in Proposal 99U1 the following addition be made to Requirement 2:-
- After "EXISTING WOODLAND AND HEDGEROWS" add "VIEWS FROM THE AONB AND ELSEWHERE IN THE AGLV".
- 16.3. That PC157 - PC162 (inclusive) be made.
- 16.4. That in Paragraph 16.18 "84 HECTARES" be substituted for "75 HECTARES".
- 16.5. That PC232 be made.
- 16.6. (a) That the Proposals Map be changed by the definition of the total area to be removed from the Green Belt, but
- (b) That consideration be given to retaining the Green Belt notation on land to the south and west of Manor Farm itself if the detail of the Proposal permits.

16.7. That the opening sentence of Proposal 99U1 be changed as follows:-

LAND AT MANOR FARM AND ADJOINING, AS SHOWN ON THE PROPOSALS MAP, WILL BE TAKEN OUT OF THE GREEN BELT. ON LAND AT MANOR FARM DEFINED ON THE PROPOSALS MAP DEVELOPMENT WILL BE PERMITTED FOR UNIVERSITY PURPOSES

That the following be added to the end of the Proposal:-

DEVELOPMENT FOR GENERAL HOUSING OR EMPLOYMENT USE NOT REQUIRED FOR THE PURPOSES OF THE UNIVERSITY SET OUT ABOVE WILL NOT BE PERMITTED ON THE DEFINED LAND.

16.8. That an addition be made to the reasoned justification referring to the three areas of land not within the University site removed from the Green Belt and the intentions for this land, whether within the general definition of "urban land" or for specific purposes or subject to specific limitations. If intended for housing development consideration should be given to allocating the land at Beechcroft Drive.

16.9. That Paragraph 16.17 be revised to include reference to the strategic issues arising from the additional housing and employment requirements of University expansion needing to be addressed in the emerging Structure Plan.

16.10. That Paragraph 16.26 (or other part of the reasoned justification) be changed to include the key elements of the Agreed Statement on Traffic, Transport and Access Issues.

CHAPTER 17. IMPLEMENTATION AND MONITORING

1. IMPLEMENTATION

17.1.1. The initial section of the Chapter outlined very briefly how the objectives of the Plan were to be achieved. Relatively few of the proposals for development are reliant on the participation of public authorities, so their execution and the operation of the Policies of the Plan will largely fall to the development control procedures. There are, however, initiatives which fall outside normal planning control, such as the continuing programme of environmental improvements and the management of the Council's own landholding, and these, too, are mentioned.

17.1.2. The section attracted no specific Objections.

2. MONITORING

17.2.1. Local planning authorities are required to keep under review matters which may be expected to affect the development or planning of their area. PPG12 gives an indication that as far as possible policies and proposals should be expressed in a way that will facilitate monitoring and review. It asks for the results of monitoring to be published, making reference to an annual monitoring report, which in Paragraph 17.6 is mentioned only as something the Council will consider.

17.2.2. There was only one Objection to the Section:-

Objection 1338

Surrey Wildlife Trust (CW).

The Objectors asked how progress towards sustainability was to be measured. One way suggested was to measure changes in biodiversity, with a willingness for the Trust to cooperate in establishing such a monitoring programme.

17.2.3. The overall Aim of the Plan being the achievement of sustainable development, the ways in which progress can be measured does deserve specific attention. Some of the monitoring reports currently produced (Paragraph 17.7) will be useful in this respect, although there may be need for analysis that has this Aim, and the subsidiary Aims of Chapter 3, in mind. This could be a particular value of an annual monitoring report. Missing from the current reports was what the public may see as a particularly important indicator, the effect of the Plan on traffic modes and volumes. Table 5.4 of the Provisional Local Transport Plan gave a useful list of targets and indicators. No doubt the information to these ends will be being gathered primarily by the County Council, but a paragraph in this Chapter explaining this could be a useful addition.

CHAPTER 17. RECOMMENDATION 1.

17.2.1. That a Paragraph be added referring to the role of the Local Transport Plan and the monitoring to be carried out in connection with movement related matters.

19. PROPOSALS MAP

Introduction

1.1. The Proposals Map, as well as the single map on which proposals are shown for much of the rural part of the Plan area, included 35 Insets, the main urban areas, the identified settlements and some other areas where the main map was of too small a scale to allow the requisite detail to be shown. Inevitably, in so detailed an exercise over a relatively large area there were a few cartographical errors, which were identified by the Council and proposed to be changed. There were also some additions to the Map required by policy changes or greater detail being available than when it was first drawn. The Major Developed Sites in the Green Belt were one example, the cycle routes another. Further changes would be made necessary by the acceptance of some of my recommendations.

1.2. An Objection by the Surrey Wildlife Trust (Objection 1328) suggested that Grid references be included on the Proposals Map. This the Council accepted in PC188. There was also the suggestion in the same Objection that Ancient Semi-Natural Woodland be shown on the Proposals Map. The protection of ancient woodlands arose in Chapter 6 (12.6.1). I assumed that where these woodlands were of importance they were afforded protection by one of the nature conservation designations. If they were not, the listing available would ensure that they would be taken into account where development was proposed. Without a specific Policy relating to such woodland, I saw no grounds for showing them as such on the Proposals Map.

2. Changes proposed by the Council

2.1. In numerical order, the following Proposed Changes involved changes to the Proposals Map.

PC17	99G1(6)	Add additional areas of flood plain.
PC38	99G11	Amendments to the boundary of the Corridor of the River Wey and Guildford and Godalming Navigations.
PC69	99M8	Add Cycle Routes.
PC80	99M8	ditto.
PC86	99S5	Change secondary shopping frontage to include old school buildings on south side of Upper High Street.
PC89	99S8	Change Secondary Shopping Area boundary to include part of Wharf Road, Ash Vale.
PC92	NEW	Define land and buildings at Guildford Railway Station.
PC93	99GT1	Change to remove Fays Studios.
PC103	NEW	Add Major developed Sites, with boundaries adjusted as agreed in response to Counter Objections
PC128	99NE2	Change boundaries of SSSI.
PC130	99NE3	Change boundaries of SSSI.
PC139	99R5	Remove open space designation on land adjoining River Wey at Millbrook and Millmead (but see Recommendation 13.5.13).

PC143	99R11	Include land north of the former A31 within the Blackwater Valley Policy Area.
PC188		Addition of Grid references.
PC189 to PC224		Corrections.
PC232	99U1	Removal of Health Authority land from Surrey University site; change to Guildford urban area to include the land.

3. In Plan order, the following changes would flow from my recommendations.

Policy 99H4	Definition of the urban area.
Policy 99H14	Existing gypsy caravan sites be shown.
Policy 99E1	Allocated employment sites Thames Water Utilities and Slyfield Industrial Estate be distinguished.
Policy 99M8	Exclusion from routes of the Guildford Borough Cycling Strategy of Pennymead Drive, East Horsley, and The Street/East Lane, West Horsley and Lynx Hill, East Horsley.
Policy 99M8	Reduce phases from two to one.
Policy 99S6	Show the Sydenham Road frontage of the Sydenham Road Car Park as Tertiary Frontage.
Proposal 99GT6/7	The Woodbridge Road Improvement be shown.
Proposal 99GT8	Inclusion in site of triangle of land to the west.
Ch.9: New Proposal	The Station as a Town Centre Development or Opportunity Site.
Ch.9: New Proposal	The Former Odeon Cinema and Prudential Buildings, Epsom Road as a Town Centre Development or Opportunity Site.
Policy 99RE3	Extend East Horsley settlement boundary to include Longhurst Road and the northern part of Chalk lane and properties in between.
Policy 99RE3	Include in the settlement boundary for Send the houses of Sanger Drive.
Policy 99RE3(MDS)	BTR Vokes, Normandy. Substitute plan for that of PC103.
Policy 99RE3(MDS)	Institute of Animal Health, Pirbright. Substitute plan for that of PC103.
Policy 99RE3(MDS)	Peasmarsh Industrial Estate. Substitute plan of Appendix 6 for those of PC103.
Policy 99RE3(MDS)	Merrist Wood College. Include as MDS.
Policy 99RE4	Include in urban area 3, Wandle Close, Ash.
Policy 99HE14	Include Areas of High Archaeological Importance.
Policy 99NE2	Changes to SSSI.
Policy 99R5	Remove designation from Pewley Hill Reservoirs
Policy 99R5	Adjust designation at Barnwood School, Park Barn, as agreed with Surrey County Council
Proposal 99U1	Define the total area to be removed from the Green Belt as the extent of the Proposal.
Proposal 99U1	Consider the designations of land removed from the Green Belt, but not part of the University site.

Proposal 99U1 Consider if area proposed for removal from the Green Belt and AGLV is more than is required.

3. These lists should not be regarded as necessarily including all changes put to me by the Council, or which would result from my recommendations. Omission is not an indication that I consider a particular change should not be made, unless that is specifically said in the report.

18. APPENDICES

APPENDIX I. GUILDFORD PARKING STANDARDS

A1.1. The Objections concerned with the parking standards included in this Appendix were considered in relation to Policy 99G1(1) in Chapter 4 and the Section headed Parking Policy in Chapter 7. As deposited, the Plan contained standards based on Supplementary Planning Guidance produced by the Council in 1994. Subsequently, Surrey County Council produced revised parking standards. These were proposed to be substituted for the standards of the Appendix by PC225.

A1.2. In response to an Objection by the Cranley Road Area Residents Association (Objection 237), the Council proposed adding information as to the source of the standards and that they were being reviewed by the County Council (PC163). That change seems to have been overtaken by events and not now to be required.

APPENDIX I. RECOMMENDATION 1.

A1.1. That PC225 be made in so far as it relates to this Appendix.

A1.2. That PC163 be NOT made.

APPENDIX II. CHANGES OF USE IN GUILDFORD TOWN CENTRE

A2.1. Under Policy 99S6, I recommend the addition to the Tertiary Frontages of the frontage to Sydenham Road of the Sydenham Road Car Park. This will require addition to the schedule of Tertiary frontages.

APPENDIX II. RECOMMENDATION 1.

A2.1. That the Sydenham Road frontage of the Sydenham Road Car Park be added to the list of Tertiary Shopping Frontages.

APPENDIX III. LOCALLY LISTED BUILDINGS

A3.1. I have recommended changes to the Policies relating to Local List buildings. These do not require changes to the inclusion of the List in the Appendix, but it could be helpful to refer to the presence of this Appendix in a relevant place in the body of the Plan.

APPENDIX III. RECOMMENDATION 1.

A3.1. That reference to the inclusion of the List as an Appendix of the Plan be included in a relevant place in Chapter 11.

APPENDIX IV. LIST OF SCHEDULED MONUMENTS, SITES OF COUNTY
ARCHAEOLOGICAL IMPORTANCE AND AREAS OF HIGH
ARCHAEOLOGICAL IMPORTANCE

A4.1. In Chapter 11, Policy 99HE14, I suggest that the Areas of High Archaeological Potential listed in this Appendix are shown on the Proposals Map. If this recommendation is accepted, an incidental change - the omission of "not" - will be required in Paragraph A4.2 of the Appendix.

Appendix IV. RECOMMENDATION 1.

A4.1. That in Paragraph A4.2 NOT be omitted.

APPENDIX V. SITES OF SPECIAL SCIENTIFIC INTEREST (SSSI) AND SITES
OF NATURE CONSERVATION IMPORTANCE

1. SITES OF SPECIAL SCIENTIFIC INTEREST (SSSI)

A5.1.1. The Appendix lists SSSI, giving each its title and a description. English Nature (Objection 80) and Surrey Wildlife Trust (Objection 1312) drew attention to some inaccuracies, which the Council proposed to correct in PC128 and PC129.

2. SITES OF NATURE CONSERVATION IMPORTANCE (SNCI)

A5.2.1. The Appendix lists SNCI, giving titles and a brief description. Objectors drew attention to some discrepancies, which PC130 corrected.

3. REGIONALLY IMPORTANT GEOLOGICAL/GEOMORPHOLOGICAL SITES
(RIGS)

A5.3.1. The Appendix lists a number of sites, for which Site in the title should be in the plural. There was one correction proposed in PC130, substituting "Earl" for "Duke".

APPENDIX V. RECOMMENDATION 1.

A5.1. That PC128, PC129 and PC130 be made.

A5.2. That in the heading to Section 3 (RIGS) "SITES" be substituted for "SITE"

APPENDIX VI. NEW APPENDIX: NOTIFIABLE INSTALLATIONS

A6.1. The Council proposed the addition of a further Appendix to list Notifiable Installations (PC23). In Chapter 4 I have recommended that this addition be made.

APPENDIX VI. RECOMMENDATION 1.

A6.1. That PC23 be made adding a further Appendix: Notifiable Installations.

APPENDIX VII. NEW APPENDIX: PLANNING POLICY GUIDANCE NOTES

A7.1. The Council proposed a further Appendix to list the Planning Policy Guidance Notes, to be referred to in Chapter 3, Paragraph 3.1 (PC6).

APPENDIX VII. RECOMMENDATION 1.

A7.1. That PC6 be made adding a further Appendix: Planning Policy Guidance Notes.

APPENDIX VIII. NEW APPENDIX: DESIGNATED OPEN SPACES, POLICY 99R5

A8.1. Under Policy 99R5 I recommend that all open spaces covered by the Policy are listed in an Appendix.

APPENDIX VIII. RECOMMENDATION 1.

A8.1. That a further Appendix be added listing all open spaces covered by Policy 99R5.

A8.2. That Appendix VI, Glossary of Terms, be renumbered to follow the added Appendices.

ANNEX 1. OBJECTORS TO INDIVIDUAL POLICIES NOT LISTED UNDER THAT POLICY IN THE BODY OF THE REPORT

1. OBJECTORS TO POLICY 99H1

Objection number	Objector
202	<i>Heron Land Developments Ltd</i>
210	<i>Alfred McAlpine Homes & Trenfold Ltd</i>
279	<i>Mr J Sawyer & Mr P H Munday</i>
443	<i>Bewley Homes Plc</i>
505	<i>Peak Quality Homes Ltd</i>
509	<i>Mr and Mrs R Simmons</i>
567	<i>Wey Estates</i>
633	<i>Mr F J Alexander</i>
640	<i>Laing Homes</i>
706	<i>H C Webb Estates Ltd</i>
707	<i>Mr Dobbie</i>
719	<i>Mr C Allen</i>
768	<i>Gleeson Homes</i>
1107	<i>Mr S Brooks</i>
1137	<i>Barratt Southern Counties</i>
1204	<i>HBF</i>
1216	<i>Myddleton Developments Ltd</i>
1258	<i>Guildford Chamber of Commerce</i>
1345	<i>Shalford Conservation Society</i>
1379	<i>Guildford Business Forum</i>
1403	<i>Bewley Homes Plc</i>
1495	<i>Beazer Strategic Land</i>
1597-1601	<i>RMC Properties Ltd</i>
1638	<i>C J C Wing Trust</i>
1689	<i>The College of Law</i>
1757	<i>Burt Boulton Holdings Ltd</i>
1801	<i>Ashdale Land and Property Co Ltd</i>
1855	<i>CPRE Surrey</i>
1955	<i>Persimmon Homes</i>
2057	<i>GOSE (CW)</i>

OBJECTORS TO PARAGRAPH 5.11

921	<i>Howard Hutton & Associates (CW)</i>
C97	<i>CPRE Surrey</i>
C233	<i>Cranley Road Area Residents Association</i>

2. OBJECTORS TO POLICY 99H2

Objections referred to by number and name in the body of the Report are not included in this list.

Objection number	Objector
14	<i>Mrs M Boxall</i>
67	<i>Mr S Young</i>
68	<i>Ms S Young</i>
86	<i>Mr A V Lavin</i>
164	<i>Ms A Maskell</i>
207	<i>Alfred McAlpine & Trenfold Ltd</i>
291	<i>Mr O F Hopley</i>
388	<i>Mr A C Dickson</i>
389	<i>Miss A Purdom</i>
400	<i>Ms M Pain</i>
402	<i>Mr M Wright</i>
407	<i>Mr & Ms M J Carter & Massagrande</i>
447	<i>Bewley homes Plc</i>
503	<i>Mr A S Kennedy</i>
506	<i>Mr and Mrs R Simmons</i>
554	<i>Sport England</i>
566	<i>Wey Estates</i>
648	<i>Mrs V Andrews</i>
662	<i>Mrs M J Roker</i>
691	<i>Mr and Mrs Fitzpatrick</i>
704	<i>H C Webb Estates Ltd</i>
708	<i>Mr Dobbie</i>
732	<i>Mr C Allen</i>
763	<i>Gleeson Homes</i>
1639	<i>C J C Wing Trust</i>
1690	<i>The College of Law</i>
1741	<i>Mrs J Peacock</i>
1750	<i>Mr W R Dawes</i>
1949	<i>Ms S Trevaskis</i>
1951	<i>Mr S C Swain</i>
1952	<i>Mr N J Wilkinson</i>
1953	<i>Mr M H Tostevin</i>
1956	<i>Mr R Bryant-Jefferies</i>
1957	<i>Mrs T Wade</i>
1958	<i>Mr M T Gardener</i>
1959	<i>Mr J R Floyd</i>
1960	<i>Mr and Mrs Harvey</i>
1961	<i>Mr B Thew</i>
1962	<i>Mr M F Ashton</i>

1963	<i>Mr and Mrs K Stocker</i>
1964	<i>Ms W Hedley</i>
1966	<i>Mr D Hedley (CW)</i>
1967	<i>Robert Shaw and Partners</i>
1992	<i>Ms K McNaughton</i>
1993	<i>Mr and Mrs Hughes</i>
1994	<i>Mrs A Maskill</i>
1995	<i>Mr and Mrs Paecock</i>
1996	<i>Miss A Purdon</i>
2000	<i>Mrs S Trevaskis</i>
2058	<i>GOSE (CW)</i>

3. CHAPTER 16. POLICY 99U1 AND REASONED JUSTIFICATION

Objection number	Objector
32	<i>Mrs P M Wood</i>
48	<i>Mr T Sines</i>
91	<i>Mr L Tutty</i>
103	<i>Mr R Davies</i>
111	<i>Mrs J L Bridger</i>
113	<i>The Ripley Society</i>
115	<i>Lt Col J W Molyneux-Child</i>
119	<i>Mr I Webb (CW)</i>
138	<i>Worpleton Parish Council</i>
155	<i>Mrs M O'Farrell</i>
157	<i>Mr D Marjoram</i>
158	<i>St Catherine's Village Association</i>
171	<i>Dean and Chapter of Guildford Cathedral</i>
211	<i>Surrey County Council (CW)</i>
212	<i>Surrey County Council</i>
229	<i>Mrs D Griffiths</i>
292	<i>Mr d Brandon</i>
305	<i>Mr and Mrs Broberg</i>
307	<i>Mr D Wood (CW)</i>
308	<i>Mr D J Sycamore</i>
311	<i>Mr D R Huggett</i>
312	<i>Mr S Bason</i>
320	<i>Mr A G Hobbs</i>
325	<i>Mr H Habibollahi</i>
327	<i>Mr B Simpson</i>
328	<i>Mr J Fleat</i>
329	<i>Mr D Whelan</i>
349	<i>GOSE</i>

350	<i>H Lockyer</i>
351	<i>Mr J J Andy</i>
352	<i>Mrs H E Johnson</i>
353	<i>Mr A Capon</i>
354	<i>Mr P McHugh</i>
356	<i>Mrs M Patel</i>
357	<i>Mrs H J Harding</i>
359	<i>Mr G Archibald</i>
403	<i>Mr L C Ryan</i>
404	<i>Mr B H Rabjohns</i>
405	<i>Mr S Palmer</i>
406	<i>Mr D B Barrett</i>
409	<i>Mr L R Angus</i>
410	<i>Mr M J Lowndes</i>
411	<i>Mr D Davidson</i>
412	<i>Mr S Andy</i>
417	<i>Mr D Hibbs</i>
424	<i>Mr N Nicolaou</i>
432/3	<i>Royal Surrey County Hospital NHS Trust</i>
466	<i>CPRE Waverley</i>
467	<i>Mr D J Evans</i>
468/9	<i>Ms N Andy</i>
470	<i>Mr I Miller</i>
471	<i>Mr D Eaden</i>
472	<i>Mr J Lloyd</i>
473	<i>Mr F G Bradshaw</i>
474	<i>Mr B Appleby</i>
485	<i>Mr J Archer</i>
540	<i>Mrs R Neppalli</i>
548	<i>Mr S R Neppalli</i>
552	<i>Onslow Village Residents Association</i>
558	<i>Mr I C Macpherson</i>
575	<i>Mr L Fisher</i>
578	<i>Mr M Boweeman</i>
580	<i>Mr D Batchelor</i>
581	<i>Mr L Steadman</i>
582	<i>Mrs L Richardson</i>
584	<i>Mr G Atfield (CW)</i>
586	<i>Mr A J A Crabtree</i>
588	<i>Mr P Burnett</i>
601	<i>Mr R Heaps</i>
614	<i>Mr J Fox</i>
620	<i>Mrs M M Over</i>
638	<i>Mr R M Seymour</i>
644	<i>Mr and Mrs G Muckle</i>

646	<i>Ms R Burnett</i>
659	<i>Dr E G Lawrence</i>
666	<i>Mrs C Richards</i>
667	<i>Mr A Dalgliesh</i>
690	<i>Mr A McCorkindale</i>
692	<i>Mr R L G Moore</i>
734	<i>Mr R A Johnson</i>
755	<i>Mr A J Sacre</i>
771	<i>University of Surrey</i>
772, 774/5, 781	<i>University of Surrey (CW)</i>
780, 784/5/7, C245, C247	<i>University of Surrey</i>
856	<i>Wanborough Parish Council</i>
870	<i>Guildford Environmental Forum (CW)</i>
971	<i>Mrs J Richardson</i>
979	<i>Mr C J Smithers</i>
980	<i>Ms A Smithers</i>
990	<i>Ms K Williams</i>
991	<i>Mr M H Trost</i>
992	<i>Mr P Eayes</i>
993	<i>Mr P M Hopkins</i>
994	<i>Mr S Gelliott</i>
995	<i>Mrs C Scarlett</i>
996	<i>Mr N A Ramsay</i>
997	<i>Mr C Smith</i>
998	<i>Mr Bastiani</i>
891, 893-9, C5	<i>The Guildford Society</i>
1000	<i>Ms C Bond</i>
1001	<i>Mr A J Kitney</i>
1002	<i>Miss C Kimber</i>
1003	<i>Mr D F Wardell</i>
1004	<i>Mr A G Smith</i>
1005	<i>Ms J Monger</i>
1006	<i>Mr G Tassell</i>
1007	<i>Ms V Behn</i>
1008	<i>Miss A Keen (CW)</i>
1009	<i>Mr R K Dray</i>
1010	<i>Mr S J McIsaac</i>
1011	<i>Mr M Glover</i>
1072	<i>Mr and Mrs Bridger</i>
1132	<i>Miss M C Usher</i>
1134	<i>Mr M J Lord</i>
1147	<i>Mr C D Van Graan</i>
1220	<i>Mr and Mrs Bonas</i>
1221	<i>Ms N Demidenko</i>

1256	<i>Ash Parish Council (CW)</i>
1282	<i>Mr S Crick</i>
1283	<i>Mr C R Britton</i>
1288-91	<i>Mr and Mrs R Smith</i>
1342	<i>Mr S Kirsan</i>
1501	<i>Beazer Strategic Land</i>
1566	<i>Mrs L Smith</i>
1567	<i>Mr A Jones</i>
1568	<i>Mr A R Burgess</i>
1569	<i>Flexford Residents</i>
1583/4	<i>Healthy Environment Group, North Guildford Project</i>
1619	<i>Councillor Mrs J Cassar</i>
1736	<i>Pirbright Parish Council</i>
1739	<i>Mrs V Ker</i>
1742	<i>Miss C Drake</i>
1751	<i>Mrs L D Bouncer</i>
1755	<i>Mr and Mrs M Lea</i>
1756	<i>Prof and Mrs W Balachandran</i>
1760	<i>North west Guildford Action Group</i>
1765	<i>Mrs S M Smethurst (CW)</i>
1794	<i>Mr A E Rees</i>
1817	<i>Mr J E Regemortel</i>
1828	<i>Mr W A R Phillips</i>
1831	<i>Mr R D Butson</i>
1834	<i>Mrs F Flynn</i>
1835	<i>Mrs M A Peters</i>
1918, C214-9	<i>CPRE Surrey</i>
1926/7	<i>Mrs R Thomas</i>
1931	<i>Mrs J Mortimer</i>
1932	<i>Mr I R Rice</i>
1948	<i>East Horsley Parish Council</i>
1950	<i>Highways Agency (CW)</i>
1965	<i>Mr J Shephard</i>
1985	<i>Mr J W Bannister</i>
2007	<i>Mr J Percy</i>
2015	<i>Surrey TEC (CW)</i>
2020	<i>Councillor T Phillips</i>
2021	<i>Councillor N Sutcliffe</i>
2023	<i>Seal & Sands Parish Council</i>
2030	<i>Woking Borough Council (CW)</i>