

Guildford Society

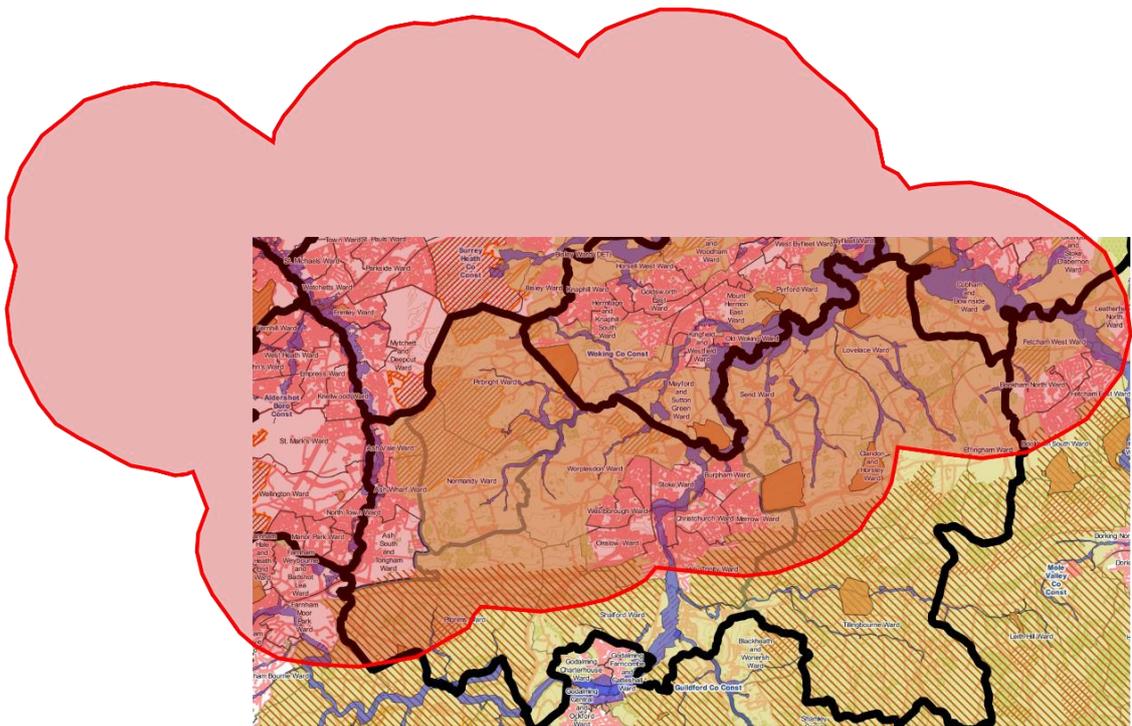
Guildford Local Plan Hearing Statement

Submission to the Examination in Public of the Guildford Borough Plan 2018

This representation uses the same numbering as the Inspector's Matters and Issues.

1.2 Thames Basin Heaths Special Protection Area ('TBHSPA')

1. The European Directive has been interpreted in the UK and a set of regulations managed by 11 local authorities including Guildford.
2. The level of charge for SANGs is discretionary but Guildford has chosen the highest developer contribution.



Map showing the Borough with its Green Belt and its AoNB constraints, overlaid by the restrictions from the SPAs

3. The TBHSPA is protected by the Conservation (Natural Habitats, &c.) Regulations 1994 ("the Habitats Regulations") which derive from European Directives 92/143/EEC Conservation of natural habitats and of wild fauna and flora and 79/409/EEC Conservation of wild birds. The Habitats Regulations establish a set of 'step-wise' procedures for decision-making by "competent

authorities" (the Borough Council being one) which are relevant to the determination of applications for planning permission.

4. The first step is to determine whether the Council is satisfied that the proposed development is not likely to have a significant effect on the SPA (either alone or in combination with other plans or projects), in which case, the Habitats Regulations are not engaged, and the Council may proceed to determine the planning application in the usual way. The test sets a low threshold and is approached on a precautionary basis. If the screening indicates that the proposal is likely to have a significant effect, then step 2 is triggered.
5. The Council's TBHSPA Avoidance Strategy SPD (2017)¹ notes:

3.1 Any net increase in residential dwellings within the zone of influence, and all developments of over 50 residential units (net) in the five to seven kilometre zone (see 2.3 onwards) are likely to have a significant effect on the SPA, either alone or in combination with other developments. Consequently, every development of these types must make provision to avoid and mitigate the potential effect on the SPA. If developments of these types provide, or make a contribution towards the provision of, the measures set out in this strategy, they can avoid the effects of the proposal and the development can be screened out during the Habitats Regulations screening assessment, meaning an Appropriate Assessment will not be required. The option remains for developers to undertake a Habitats Regulations screening assessment and, where necessary, a full Appropriate Assessment to demonstrate that a proposal will not adversely affect the integrity of the SPA.

6. A **positively prepared plan** should put the onus on the Council to establish (in the position of a development promoter) whether each development would have a significant impact on the TBHSPA (and what that impact would be), and to establish whether the appropriate mitigation of harm would be a SANG or some other means of protection for the TBHSPA.
7. There has not been an adequate risk and benefit assessment in preparing the Plan (if any at all, the burden being placed on developers) – preventing Guildford from exempting town centre development from SANG requirements (where there are plenty of non-SPA areas of recreation within walking distance of the centre) and ignoring the potential to develop brownfield land near an SPA where local mitigation measures could be put in place.

¹ https://www.guildford.gov.uk/media/24946/Thames-Basin-Heaths-SPA-Avoidance-Strategy-SPD-2017/pdf/Thames_Basin_Heaths_SPA_Avoidance_Strategy_SPD_2017.pdf (accessed 28/4/2018)

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8. Because of Guildford's high (89%) proportion of Green Belt land, any SANG will result in some development in the Green Belt (for car parking and ancillary uses), and these ancillary uses have not been allocated in the Plan.
 9. Guildford has chosen to set its SANG contributions considerably higher than most if not all other affected local authorities.
 10. **IMPACT: viability of town centre sites is adversely affected, leading to risks to affordable homes delivery and potentially even CIL contributions, and leading to delays or obstructions to bringing forward brownfield urban sites for housing.**
 11. APPENDIX: Guildford Society Topic Paper on SANGs

1.3 Public Sector Equality Duty

12. In excluding The Guildford Vision Group from meeting officers in respect of the Local Plan, the Council has failed to appropriately apply the 'Gunning' principles.
13. **IMPACT: the Plan is unsound – particularly with regard to the failure to positively prepare a plan for the town centre, and its treatment of town centre sites is not justified or effective – adversely affecting the preparation of the Plan and the formulation of its policies, which proper engagement with GVG would have prevented.**
14. APPENDIX: email from Tracey Coleman to various officers including the Local Plan team.

2.1 & 2.2 Migration Trends and Unattributable Population Change

15. The methodology of calculation of interim population numbers (as expressed in our previous representations) remains challenging for all university towns. There has been no attempt to require GP surgeries to deregister and reregister students each academic year, and this leads to large numbers of students remaining on the GP registers when they have moved away.
16. We support the approach to population and household formation rates promoted by Guildford Residents' Associations and will not argue that point here.
17. **IMPACT: failure to adequately accommodate this phenomenon means that the projected population numbers and household formation rates are likely to be overstated.**

2.4 The Need for Affordable Housing

18. We recognise there is an urgent need for affordable housing. We also note that there are extreme differences in affordability in divers parts of Guildford – for example between Park Barn and the Warwicks Bench area.
19. Of the most recent large-scale developments brought forward for planning in recent years, there is a typical maximum affordable housing provision of around 10%, and this before CIL is introduced.
20. **IMPACT: the shortage of affordable housing and good quality housing that key workers can afford is critical and, in addition to traffic congestion, is cited as the main reason companies such as Ericsson, Colgate Palmolive and Sanofi are already planning to move to Reading from around 20,000m² of business space in Guildford.**

3.3 Other Unmet Need Issues

21. Insufficient regard has been had in the Plan to the regeneration of town centre brownfield sites.
22. There is no longer-term strategic plan to prepare other brownfield areas for development in time for the next plan period.
23. **IMPACT: it has been deemed necessary to plunder the Green Belt for developments where brownfield sites should have been brought forward sooner, given the typically longer lead times. This is unlikely to be different for the next plan if preparations are not made in this Plan.**

4.1 The Ability or Otherwise of Increasing the rate of Delivery in the early years

24. The inability to accommodate more development in the early years of the Plan is real, logical and hard to resolve. It is a function of a failure to plan positively for decades.
25. Guildford has an infrastructure deficit of £500m (Surrey County Council).
26. The town centre suffers from substantial congestion and comes to a virtual standstill with any shock on the regional and local road network.
27. The A3 is an identified problem. The town centre will (in the absence of positive infrastructure planning such as is identified by GVG) come to a halt whilst major works are undertaken on the A3.

28. This infrastructure crisis has been identified and solutions urged for many years. It is largely the result of decades of inertia and incompetence at both borough and county levels, and, although some progress is being made, the town centre remains unplanned and a hostage to development outside the borough (eg., Dunsfold).
29. **IMPACT: the failure to address the town centre means that the situation will worsen, more companies will move away and the capacity to accommodate new development will remain heavily constrained until (a) the A3 works are complete; (b) the Farnham Road Bridge is made resilient; and (c) a long-term solution to the gyratory bottlenecks have been implemented.**

4.2 Is the Housing Trajectory Realistic and Deliverable?

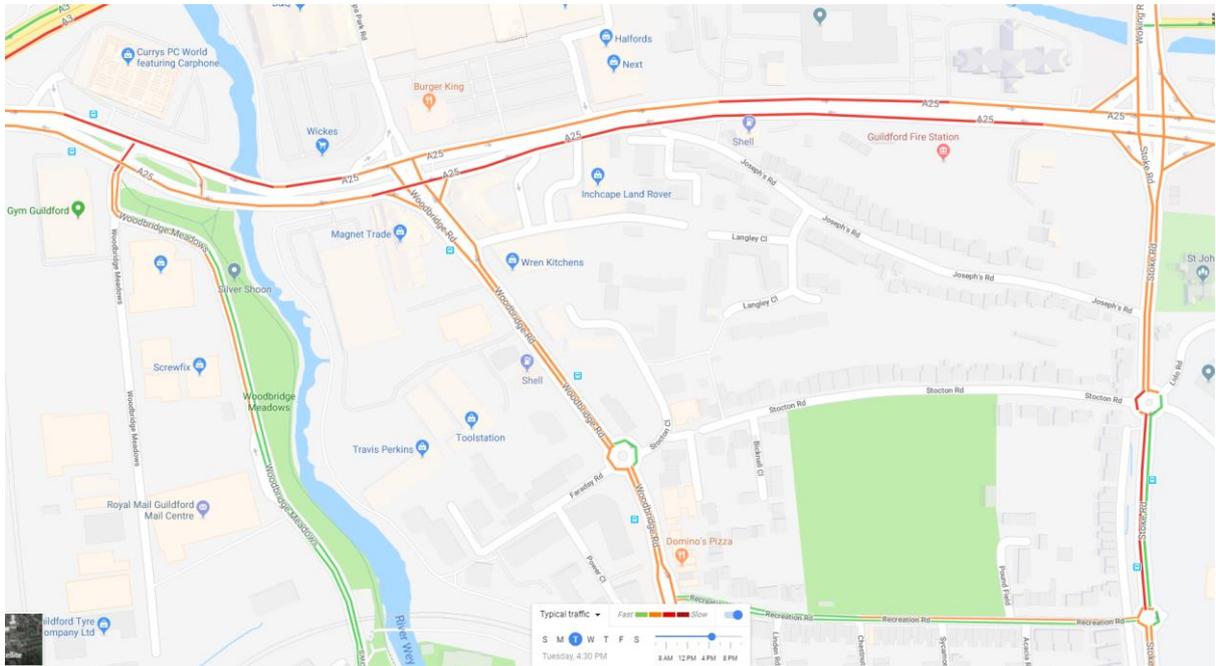
30. The sites for early years delivery are unlikely to deliver housing units at the rate suggested. For a typical house builder site there would be a delivery rate of approximately 60 dwellings per year per house builder.
31. Although SOLUM was won on appeal with an assumption it would deliver 135 homes over the first five years, there is no prospect in our view of the consented scheme being built because it, contrary to representations made to the Inspector, cannot accommodate 'Platform Zero' without substantial redesign and a new planning consent.
32. Of recently completed developments in the Guildford Urban Area, there remain significant numbers of unsold units which will have a suppressing effect on rates of supply, and the questions we have over (1) pricing; and (2) the actual levels of need will be echoed in the supply chain with a slower delivery rate.
33. The combination of a likely need to adjust aspirational prices downwards and the astronomic levels of contribution to CIL and SANG and the expectation developers will fund much or most of the infrastructure delivery, will combine to make schemes unviable (even without affordable housing), and will delay or prevent schemes – especially on brownfield sites
34. **IMPACT: there will even be pressure on delivery that puts at risk the trajectory numbers. There will also be a delay to delivering the infrastructure that will enable later years development.**

4.3 The Key Infrastructure Improvements Influencing the Housing Trajectory

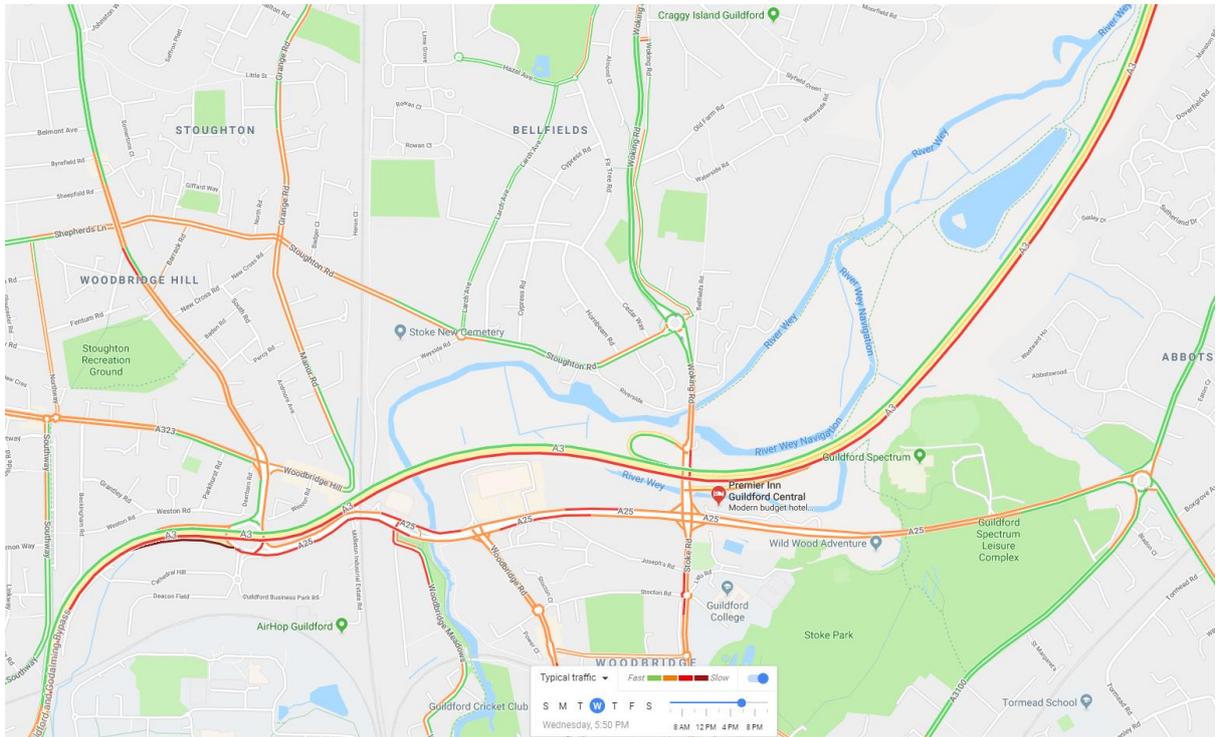
35. Guildford town centre is affected not only by development in the borough, but also developments beyond our boundaries (as demonstrated by the Council's EIR response to the Society in respect of Dunsfold – appendix 3).
36. Similar traffic impacts from all the new settlements and extensions will cause severe worsening of existing traffic congestion.
37. The town centre traffic and transport infrastructure has been largely unplanned and poorly managed over decades and lacks resilience (suffering frequent shocks from problems on the A3, flash flooding on the old by-pass or regular accidents on the local road network).
38. The A322 (Woodbridge Road) will become a major north-south pinch-point if the Sustainable Movement Corridor (SMC) is introduced (the town centre Route is identified but not yet planned in detail to show how the pinch points will work such as the railway overbridge - *below*).



39. The A25 (Ladymead) is already regularly showing red on Google Traffic and will be reduced from four lanes to two to accommodate the SMC, forcing yet more traffic through the town centre.
40. The A3 has been running at peak hours capacity for the past twenty years, forcing traffic to rat-run on local roads and through the town centre, and, in our view, this will not be much improved without rethinking the road entirely.



Typical afternoon traffic conditions on Ladymead – Source: Google Maps



Typical evening rush hour traffic conditions on the A3 – Source: Google Maps

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41. Drainage and utilities are struggling to cope with the existing demand, and there will need to be substantial additional homes (particularly in the town centre) to make the business case for wholesale improvements.
 42. **IMPACT: Guildford is too late in its infrastructure planning cycle to be able to quickly resolve the rate of delivery of key infrastructure projects – or at least to take control of their delivery – and it will need to raise money but did not put in a bid for town centre or borough-wide NIC funding to unlock its problematic housing delivery.**

5.3 5-Year Housing Land Supply Going Forward

43. The housing delivery plan in the SLP represents a major set of accumulator bets on events largely beyond the control of the Council. The Council could have taken some initiative to ensure it was in the box seat, but it changed so much of the Infrastructure Delivery Plan prior to the last Regulation 19 Consultation to put the onus on developers to make that happen.
44. The focus seems to have been on ensuring that the green-field sites come forward but not on prioritising the preparation through the SLP for regenerating brownfield sites.
45. At the beginning of the Plan period and until around the eighth year of the plan period, even if delivery follows the Council's planned trajectory, Guildford will have a substantial shortfall in its five-year housing land supply ('5YHLS').
46. There is no evidence in the SLP that, in revising the Green Belt boundary, the Council has demonstrated there will be sufficient ongoing action to bring forward brownfield sites and regenerate areas such as the town centre to meet the requirements of NPPF Paragraph 83: "...Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, *authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.*" (our emphasis).
47. **IMPACT: not only is the delivery plan in the SLP a gamble, but so also is the trajectory beyond the plan period. Failing to have in the SLP a clear pathway to making brownfield land available in this and the next local plan will necessarily put at risk the new Green Belt boundaries, and it will heap further pressure on the ability to meet the 5YHLS throughout the plan period.**
48. Bringing forward the planning of the town centre and its brownfield sites into the local plan would have ensured there was resilience built into the SLP and a clear plan for further

intensification of existing uses in the Guildford Urban Area – in a positively-planned way – throughout the SLP and beyond.

6.2 The Delivery of Affordable Homes

49. In the recently decided case of *Parkhurst Road Limited v SoS, CLG & Islington Council* – (<http://www.bailii.org/ew/cases/EWHC/Admin/2018/991.html>) has established that **overpaying for a site in the expectation of avoiding planning obligations cannot be a legitimate approach to the viability assessment.**
50. Recent applications and appeals in Guildford have included viability assessments that do not seem to challenge the site value or site purchase cost, and the Council has accepted a lower provision of affordable homes.
51. The principal problem we have is NPPF 173, clarified by NPPG 019 as follows:

In making decisions, the local planning authority will need to understand the impact of planning obligations on the proposal. Where an applicant is able to demonstrate to the satisfaction of the local planning authority that the planning obligation would cause the development to be unviable, the local planning authority should be flexible in seeking planning obligations.

This is particularly relevant for affordable housing contributions which are often the largest single item sought on housing developments. These contributions should not be sought without regard to individual scheme viability. The financial viability of the individual scheme should be carefully considered in line with the principles in this guidance.

52. The Parkhurst case established greater robustness around the calculation of land value:

Central to the consideration of viability is the assessment of land or site value. Land or site value will be an important input into the assessment. The most appropriate way to assess land or site value will vary from case to case but there are common principles which should be reflected.

In all cases, land or site value should:

- reflect policy requirements and planning obligations and, where applicable, any Community Infrastructure Levy charge;
- provide a competitive return to willing developers and land owners (including equity resulting from those wanting to build their own homes); and
- be informed by comparable, market-based evidence wherever possible. Where transacted bids are significantly above the market norm, they should not be used as part of this exercise.

53. The Society would like to see the policy make it very clear that overpayment for land in the expectation of eliminating or reducing affordable housing delivery will not be permitted, and that viability assessments must be a matter of public record where the amount of affordable housing provided falls below, say, 90% of target.
54. No developer should be able to hide behind a confidential viability assessment and overpayment for a site as an excuse for failing to deliver against Guildford's pressing need for affordable housing.
55. **IMPACT: Without adequate safeguards in the SLP, the affordable housing requirement is no more than a pipe dream.**

6.5 The Provision of Student Accommodation

56. Much of the demand for student housing arises from the University of Surrey, but there are substantial student communities at other further education establishments.
57. Dedicated space should be provided for students to (a) reduce the burden on communities and family housing provision, and (b) ensure that Houses in Multiple Occupation ('HMOs') do not become so densely provided in concentrated areas as to damage the communities in which they are provided.
58. **IMPACT: if the SLP policies are not tightened up as regards student housing and HMOs, and if the SLP does not positively plan for student homes, either the further education establishments or the town and borough will suffer. The failure to plan runs counter to the purpose of a strategic land allocation plan.**

7.1 Will the Plan Deliver the Right Amount of Employment Space?

59. Guildford is currently in a state of flux from an employment perspective. Three major occupiers have either announced or are planning to relocate from Guildford to Reading (Ericsson, Colgate Palmolive and Sanofi – amounting to 20,000m² of B1 business space in and around the central area of the Guildford Urban Area).
60. Industrial space and business space along Walnut Tree Close and Woodbridge Meadows is suffering from very poor road and public transport infrastructure.

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61. There is demand for well-located offices and industrial units (particularly B8) in and around Guildford, but the shortage of housing that workers can afford and the heavy congestion in the town centre and outside are very definite demand-suppressants.
 62. There needs to be an update of an objective assessment of employment land need in to validate the SLP's assumptions.
 63. **IMPACT: getting the assessment of need wrong would lead to too much or too little space and could result in the stagnation of Guildford's economy which contributes substantially to the region's and nation's economies.**

7.2 Should the Plan Protect Employment Space?

64. Please see the response to 7.1.
65. There should be no golden principle against all others of safeguarding employment space. However, there should be no disproportionate cull of employment space to increase the housing provision per se.

8.1 Is the Plan's Approach towards Guildford Town Centre Realistic Given Retailing patterns?

66. The Society's membership and Executive strongly support GVG's approach to the town centre and its master plan, and deeply regret that the Council has failed in any respect whatsoever to positively plan for the town centre, choosing instead to identify individual piecemeal sites (and by no means all available sites) with little regard to public realm, transportation and complementary uses.
67. The future health of the town's leisure (food & beverage ('F&B') and other uses) and retailing will depend – in the brave new world of 'clicks versus bricks' – upon dwell times. Making the centre the best it can be as an attractor of people.
68. Simply building more retail because there is shown to be demand in the Carter Jonas report is fundamentally naïve and flies in the face of the need-based approach in the housing numbers.
69. The GVA of retailing in Guildford has been shown to be low when compared to our knowledge-based sectors.
70. We do, however, need to create areas in the regeneration of the brownfield sites where we have active street frontages, and these should probably be predominantly retail and F&B uses.

71. Our public transport system – particularly for buses – needs to be part and parcel of the regeneration strategy, delivering passengers to the heart of the towns shopping and leisure areas more effectively than private cars.
72. **IMPACT: building too much new retail, with unit-types favoured by the multiples, in the centre of Guildford will put pressure on the High Street and will cause major harm to the town centre, whilst reducing the scope to deliver other uses in the town centre. Building too little retail is unlikely to prevent Guildford remaining a top level resilient retail town.**

9.2 Does the Plan Direct Housing Strategically to the Right Places?

73. Fundamentally, the plan is unambitious in the already-developed areas. It fails to highlight any direction of travel (even if delivery may not be possible until the next Local Plan) towards regenerating key areas of the Guildford Urban Area.
74. The Society has highlighted, in its previous responses, that there are some fundamentally relatively deprived areas in the Borough and town where development and regeneration should be encouraged, and yet the SLP is silent.
75. Clearly there is much more work to do on infrastructure – particularly (but not exclusively) transport and traffic infrastructure.
76. Expanding the town to the east and the west (Blackwell Farm and Gosden Hill Farm respectively) does not in and of itself solve anything other than to provide a short-term feast of housing in a famine of supply. The proposed new railway stations and the Sustainable Movement Corridor will help to link these development sites to the town centre, but there is no evidence in the Settlement Profiles Report to show why these sites would be appropriate and how they would help to solve existing problems in the immediate areas.
77. The areas of Walnut Tree Close, Woodbridge Meadows and Bedford Wharf should be brought forward in the SLP with at least the aspiration that they would become residential sites.
78. The provision of employment space at or near to transport interchanges may displace some out of town or edge of town housing, but this is likely to be at 30-40 dwellings per hectare, whereas the central urban areas should be able to accommodate three to four times that density, leading to the more efficient use of our very scarce developable land.
79. **IMPACT: the land allocations lead to highly inefficient use of land in some areas, a failure to plan strategically for a pipeline of sites well beyond the current plan period, a perpetuation**

of existing failing employment land allocations that preclude the intensification of residential uses in the town centre and where they would help to make public transport more viable.

9.3 Does the Plan Direct Employment Uses to the Right places?

80. See our response to 9.2

9.4a Does the Plan Strike the Right Balance Between Urban Sites and Urban Extensions

81. Broadly, and in principle, there is no balance between the two. The urban sites remain partly allocated and largely unplanned, whereas the urban extensions are being used to compensate for decades of anything but positively-prepared plans.
82. There is little sign in the SLP that there will be a balance between urban and urban extension sites by the end of the SLP.
83. **IMPACT: the Society fears that the proposed incursions into the Green Belt will not be the last. Unless the SLP is made to address the continuing promotion of a pipeline of brownfield sites during this local plan period, it will be necessary to raid the Green Belt again next time – and this is unsustainable plan-making politically and in terms of the NPPF.**

9.4b Has the Potential for Further Residential Development in the Urban Area been Adequately Explored?

84. The Council's own Town Centre Regeneration Strategy TCRS(2017) identifies that there are substantially more homes that could be delivered in the town centre. This has been explored but not adopted.
85. The Guildford Vision Group master plan – which the Society strongly prefers over the TCRS(2017) – shows substantially more housing than the SLP and the TCRS(2017).
86. The Council shows no signs of having explored the propensity for substantial housing numbers in the broader urban area, and this may mean that there is little scope to bring any substantial numbers of dwellings forward in those areas during this plan period.
87. The very poor quality of the Settlement Profiles Reports has prevented the Council exploring the need for regeneration prompted by its evidence – we contend substantial re-use of brownfield sites would have been shown to be justified and that an effective master-planned

regeneration of poor quality estates will, in the long-term, deliver stronger, safer communities and greater numbers of housing – albeit this may require the Council to use CPO powers.

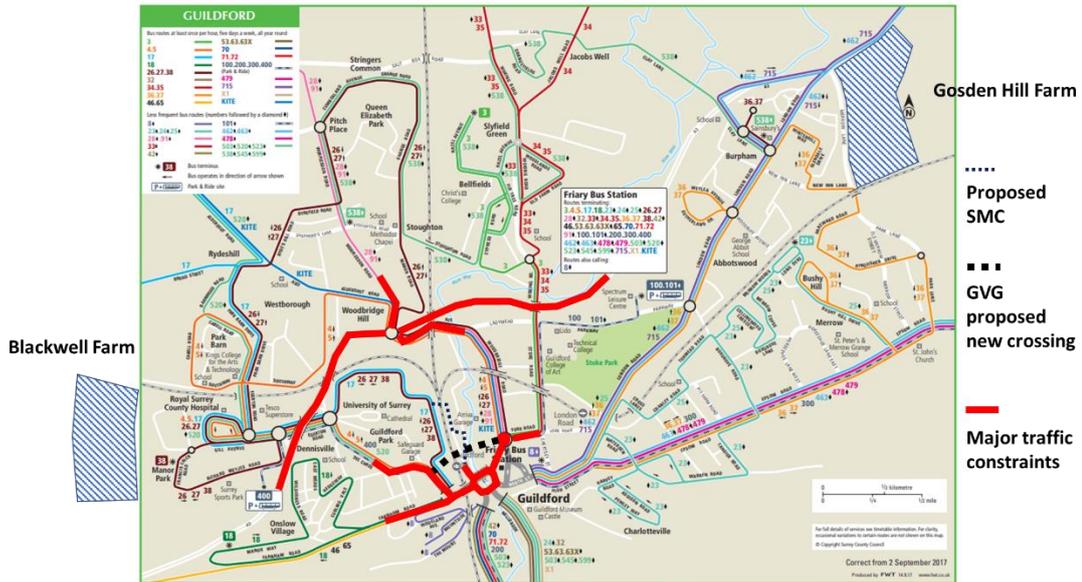
88. **IMPACT: the SLP uses more greenfield land that the Society thinks is necessary (notwithstanding our concern about the accuracy of the housing numbers – see 2.1 and 2.2). The balance of development has not been shown to follow from a strong evidence base – rather the plan was formulated and the evidence base has followed.**

9.5 Are the Proposed Green Belt Releases Justified by Exceptional Circumstances

89. We regret the need to use any Green Belt land, and we firmly believe this is a manifestation of the failure to plan positively in our urban areas over the past few decades.
90. If the release of Green Belt sites provides breathing space to positively plan the urban areas (especially the town centre), then it may be justified. The SLP does not, however, include a positive masterplan for the town centre, and so it is not clear that the quantum of the release and the timing of it will promote brownfield development nor that it amounts to exceptional circumstances.

9.8 What Would Happen if the Plan had to Accommodate More Housing?

91. The transport infrastructure simply cannot cope with the current levels of population and the development occurring in surrounding boroughs.
92. GVG has shown that the town centre can accommodate more development but the SLP would need to include the town centre masterplan to achieve this.
93. On balance, we agree with the Council that the infrastructure is highly constrained. We agree that bringing forward a large amount of early years housing will cause the existing very challenging traffic and transport networks to become severe.
94. The SLP relies on a proportion of movements to be delivered by modal shift from private cars to buses. There is no evidence to show that this will be any more than a greater proportion of take-up from the new developments.
95. The bus network relies on all the roads it uses being clear enough to run a predictable timetabled service.



Surrey County Council bus map overlaid with traffic constraints and potential new infrastructure

96. **IMPACT: accommodating more housing (other than on well-connected sites in the town centre) without fixing the infrastructure will lead to a catastrophic failure of public transport resulting from an unsustainable increase in private cars on a congested road network.**

10.1 Does the Plan Promote Good Urban Design on All Sites?

97. The absence of master planning (particularly in the town centre) and the delay in producing even the first draft of the Development Management DPD for public consultation, creates a vacuum in which land allocation of itself will not ensure good design.
98. Sites developed in piecemeal (for example 177 apartments at Station View, and the approved scheme for Guildford Park Car Park) are creating cul-de-sac developments which largely turn their backs on existing communities and are generally impermeable.
99. The SLP does not do enough to encourage the creation of place or the design of the spaces between developments.
100. **IMPACT: without master planning, and without greater direction and clarity, Guildford will continue on its current unsatisfactory path of developments designed without regard to Guildford, its streetscapes, its people and its visitors (eg., Waitrose on York Road).**

10.2 Is the Plan Sound in Respect of Heritage Assets?

101. The failure to produce the Development Management DPD and updated Conservation Area assessments does not provide adequate protection for the assets themselves.
102. The lack of protection of key views will damage the ability to preserve the character of this gap town, which could be achieved whilst enabling the best use to be made of brownfield sites where they do not interfere with the heritage views.
103. **IMPACT: piecemeal development has already begun to spoil the integrity of Guildford's heritage, but, more by luck than judgement, the main offenders date from the 1960s. An insufficiently protective plan will encourage development that will damage Guildford and the context at least for its heritage.**

A5 (Jewsons site), A6 (North Street Redevelopment, and A7 (Guildford Station), A9 (Walnut Tree Close)

11.1 Could the Plan be More Ambitious with Regard to Housing numbers on A5, A6, A7, A8 & A9?

104. We support the GVG approach to master-planning this area and believe that much more urban brownfield housing can be provided.
105. The traffic problems in this area (which will be changed but not eradicated by closing the road to through traffic) have caused major constrictions to businesses for many years and there has been a regular exit to other locations (and often other boroughs) as a result.
106. A combined strategy of relocating business uses to edge of town locations which are to be served by new railway stations and the Sustainable Movement Corridor, with converting some or all of these inefficient employment uses to primarily residential uses will have the benefit that sites which would have accommodated homes at 30-40 dph are replaced in town at 100 to 200 dph, in locations where residents would add to the evening economy of the town and would have access to the countryside surrounding the town within walking distance.
107. The Society would like to see attractive roofscapes and the protection of key views – a graduated use of height that does not resemble the SOLUM wall will be essential if such developments are to sit well in Guildford's skyline.

11.2 Should any of Those Sites be Directed Towards Student Accommodation?

108. Inevitably more student accommodation will be required but the Society believes more and better use should be made of more than 2 hectares of surface car parking on the university campus rather than allow it so spread arbitrarily into areas which are the most sustainable for new homes (affordable and for families).

A15 (Land at Guildford Cathedral)

11.3 How is it intended to mitigate the effect of the site on the setting of the Cathedral?

109. The Council's own argument against SOLUM seems to count against development on the eastern side of Cathedral Hill. The Society would have objected to the planning application but for the need for the Cathedral to raise money for an endowment and the substantial recently-completed repair works.

A25, Gosden Hill Farm, Merrow Lane, Guildford

11.11 Is the plan justified in referring to an all movements junction, park and ride, and land being "potentially required"?

110. It will be necessary to rethink the A3 junctions as part of the infrastructure works – but there is no agreed scheme for the A3 along its length through Guildford.

11.12 Is the delivery trajectory on this site affected by any of the A3 improvement proposals?

111. Yes, without A3 improvements, this will cause much more southbound traffic to have to use the A25 and town centre, and the existing infrastructure cannot cope.

11.14 In combination with the allocations near the A3 at Send (see 11.34 below), is there a risk of a significant diminution of the Green Belt in this locality? Can the perception of the eastward sprawl of the wider Guildford urban area along the A3, and the encroachment into the undeveloped gaps, be avoided?

112. The restrictions and constraints in Guildford will inevitably force the urban area to widen to east and west. There is a very clear sense that this will appear as urban sprawl with barely a breath between Burpham (extended) and Send (extended).

A26, Blackwell Farm

11.15 Can access to this site from the south be successfully achieved from the A3 / A31 without significant detriment to the landscape?

113. The Society would be fundamentally opposed to any major new junction being created on the A31 due to its long-ranging visibility and the scarring that already exists where the A3 cuts through the Hog's Back. This would be an undesirable incursion on the AoNB.

11.16 Where would the traffic impacts occur and how would they be mitigated?

114. The development will cause traffic to feed into the already heavily congested routes from the east to the town centre, and more traffic will seek to enter the town across the failing Farnham Road Bridge. This is a major reason why the Society supports GVG in its attempts to provide an additional east-west crossing over the railway and river.

11.17 How would the wider landscape impacts of this development be mitigated, including impacts on views from the AONB?

115. If development were concentrated at the lower parts of the site, close to the railway, access to buses and trains would help mitigate transport and traffic concerns.

116. The Society is concerned that a 'garden village' approach would use more land than necessary and would be unlikely to lead to large take up of public transport.

117. No development should exceed 90m AOD built height to protect views to and from the AoNB.

11.18 What is the evidence for the need for the proposed amount of land and floorspace specifically as an extension to Surrey Research Park?

118. The Research Park is a successful business incubator and a location for science-based (high GVA) companies. With the development of a new railway station to serve this area, this is precisely the sort of location for additional employment floorspace. The development needs to avoid sprawling (as the existing research park has).

A33, University of Law

11.23 Should the plan be more ambitious regarding the number of students that could be accommodated on this site?

119. This is a sensitive site but it would perhaps be beneficial to view the Mount Browne and University of Law sites together to ensure a suitably-scaled development could be realised, accommodating more students on site.

A35, Wisley Airfield

11.24 Is the size of the allocation sufficient to create an adequately self-contained new village?

120. Notwithstanding the appropriateness of the site, the Society has previously noted that the development is either too large or too small – a village of around 600 homes would not place an overbearing burden on Ripley and Horsley; a substantially larger settlement could live within itself and could justify regular public transport between, say, Woking and Horsley via Send and Ripley and the new settlement.

11.25 What is the position regarding the substantial brownfield/hardstanding areas that are not included within the site boundary?

121. If the non-brownfield areas were to be made common land along with some additional surrounding areas – whether SANG or not – and protection were made to the boundaries of the SPA to prevent access, all the brownfield land may be capable of use (which might make for a better-shaped community in place of the linear runway design).

<5,000 words excluding references to appendices and titles inserted for ease of navigation relative to the Inspector's questions and this note

Appendices:

1. Guildford Society SANG paper
2. Guildford Society Infrastructure paper
3. Copy of email from Tracey Coleman to key officers:



GVG Comms FOI
2017-690.pdf

4. Copy of Dunsfold FOI Response



FOI Dunsfold.pdf

5. Statement of Common Ground with the Guildford Vision Group