

# **GBC DRAFT LOCAL PLAN ENQUIRY IN PUBLIC (EIP)**

## **An Alternative Approach to the Current GBC Local Plan Proposals**

Presentation from

**Cross Group Consultants**  
(Ref. S602337)

Cross Group Consultants  
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## **Introduction to Cross Group Consultants**

Prior to forming Cross Group Consultants, the author was an international management consultant working with international airlines and mining corporations since 1968.

Since its inception in 1986, the Consultancy has been primarily involved with the manufacture and supply to the global marketplace of high security printing products such as currency, passports, visas and financial instruments.

During the period 2002 to 2012 they also organised and ran a series of 13 international security printing conferences and exhibitions across Europe and Asia.

## **Introduction to the Author: Colin Cross**

Although a resident of Ripley since 1976, the author became a Parish Councillor in the early 1990's and the Lovelace Councillor for the Guildford Borough Council in 2014 after retirement. The views expressed in this report, however, are independent of both Ripley Parish and Guildford Borough Councils and are presented as an alternative in an attempt to overcome or minimise the problems that exist within the GBC Plan as it now stands. The author is presenting this report in written form to allow it to be fully considered and is happy to discuss all or any of its contents at any point during the enquiry process.

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## A. Background to and Category Split of the Plan and its Target Units

The Plans problems began early, at the Settlement Profiles Report stage, when Guildford Town (Population 74,000) was ranked as equal amongst 30 others in the borough, some as small as Ash Green (pop.593). Each merited a 3 page 'mini report' but, for obvious reasons, Guildford's was extremely superficial and fails to perform any useful function. Its failings proved to be a precursor to the failure of the Plan to adequately and equitably provide the town itself with sufficient new homes. Instead of which the Plan has opted for more retail emphasis which is largely inappropriate and reflects a backwards looking stance, for the town's future development. The numerical shortfall that this decision created then led to a search for very large strategic sites outside the town in Green Belt areas.

The 2014 Pegasus Green Belt and Countryside Study (GBCS) (April 2014) was, in a number of ways, a flawed study and merits a separate report detailing its primary failings. That might prove to be an unwarranted or unwanted distraction at this late stage as 4 years have now diminished its immediate relevance, suffice to say its methodology and analysis lead to a number of false conclusions being reached, mainly involving the 278 separate land parcels that Guildford Borough was divided into and the misinterpretation of the data applied to them.

Interestingly, and appertaining to the current housing units (outside of strategic sites) planned in Rural/Green Belt areas, Pegasus produced as part of the GBCS, a schedule entitled 'Estimated Development Capacity Schedule'. This looked at potential Local Plan Development Areas (PDAs) in and around 19 of the primary villages in the borough (see Appendix A). That showed over 170 hectares of available land in these areas, which was assessed as capable of producing 5,100 housing units over the plan period. Somewhere in the intervening period that number has dwindled very significantly, as shown in the chart below (See 'Villages, A37-A45'), now showing only 913 units rurally.

<b>2017 GUILDFORD LP - SPLIT FOR NEW HOMES CHART (GBC Submission LP: December 2017)</b>		
<b>Main Categories</b>	<b>Number of Units</b>	<b>%</b>
Guildford Town Centre, A1-A12 (7 sites)	1,285	10.3
Guildford "Urban" Areas, A13-A26 (9 sites) (Primarily new sites at Slyfield, Gosden Hill & Blackwell Farm)	5,104	41.1 (33.8% on 3 main sites)
Ash and Tongham, A27, 28, 29	1,870	15.0
Previously Developed Land in Greenbelt, A32	395	3.2
New Settlement in Green Belt, (Former Wisley Airfield), A35	2,000	16.1
Villages, A37-A45 (8 sites)	913	7.3
Misc (Commenced, Windfall, Rural Exception, etc.)	859	7.0
	<b>12,426</b>	<b>100%</b>

## B. Comments and Alternative Targets in Each Category

A study of the above numbers brings forward the following conclusions:

1. Guildford Town Centre is not being utilised sufficiently for new homes when considering its high suitability (travel facilities, shops, entertainment, are all in plentiful supply), and a target in excess of 2,000 homes would be more reasonable, using the available space for more homes rather than more retail offerings and the ongoing aim to continue the non-residential usage of key sites.
2. 'Guildford Urban Area' is something of a misnomer as, in this instance, it includes a large scale industrial site and two Green Belt farming areas, all areas completely outside the town or its suburbs. The true urban area itself, excluding these sites, only contributes 8% (904 homes) and should be capable of further new housing in its many suburbs, such that a reasonable target could be 2,000, not 904. The industrial site at Slyfield is believed to now be targeted for 1,500, not 1,000, new homes and attainable in the period, if not then it should be.
3. The two Green Belt sites should be the subject of a review (together with the Wisley site), as to their locational and sustainability credentials. (**Note:** it may be that the Gosden Hill site will be seen to offer the best combination of features due to it being the least controversial location with the best transport links of the three and capable of becoming a northern suburb of Guildford).
4. Ash and Tongham has already been the subject of much recent development therefore, although the current target is relatively modest, it is perhaps reasonable in this context not to alter this now and it could be reviewed at 5 yearly intervals.
5. Previously Developed Land in the Green Belt amounts to a small number of brought forward sites and 3.2% of the total housing and must therefore be considered as being too low as a contribution. There are more opportunities out there and a figure of 1,000 homes ought to be achievable across the borough over the 15 year Plan period.
6. 'New Settlement in the Green Belt' (Former Wisley Airfield), this site is the least tenable of the 3 strategic sites in relation to infrastructure and sustainability, (particularly ref. its traffic issues, accessibility and its isolated location). As such, it should be reviewed along with the other 2 Green Belt sites in 3. above in relation to the site credentials, so that a more in-depth assessment and comparison is made.
7. Villages across the borough contribute only 913 homes and this is below par when considering their relatively large numbers (30+ villages and many other hamlets, see Appendix B) and their local needs for modest levels of 'natural' expansion over the 15 year period so as not to stagnate and deteriorate socially. A figure of 2,000 is considered reasonable as an overall target for the duration of the plan, bearing in mind that a lot of villages are in Green Belt and AONB designated areas and have limited scope. (The list details 48 villages and hamlets and 2,000 units over the 15 year Plan life would equate to an average of 3 units each p.a.).

### C.i. Revised Suggested Targets for The GBC LP

	Main Categories	Current Units	Recommended Units	Difference
1	Guildford Town Centre	1,285	2,000	+ 715
2	“Urban” Areas:			
	a) Slyfield	1,000	1,500	+ 500
	b) Gosden Hill and Blackwell Farm	3,200	1,600 max. (subject to review)	- 1,600
	c) The rest	904	2,000	+1,096
3	Ash and Tongham	1,870	1,870 (subject to 5 year review)	0
4	Previously Developed Land in the Green Belt	395	1,000	+ 605
5	New Settlement in the Green Belt (Former Wisley Airfield)	2,000	800 (subject to review)	- 1,200
6	Villages	913	2,000	+1,087
7	Misc. (Commenced, Windfall, Rural Exception, etc.)	859	1,000	+ 141
		12,426	13,770 (+ 11%)	+ 1,344

### C.ii. Summary of Changes

To summarise, the changes above incorporate a potential for the 3 large Green Belt strategic sites to be scaled back by 56% overall and that could ultimately mean that in reality only 1 of the 3 sites becomes operative or it could mean an overall numerical realignment across the sites, depending on the outcome of a 3 Green Belt Sites Review. However, that numerical reduction can be more than compensated by reasonable increases to the 15 year targets across the town centre and the ‘true’ urban area of Guildford town and its suburbs, plus revising the Slyfield figure to the latest one of 1,500. Leaving Ash and Tongham as it is for the present, then the remaining target increases are for the Previously Developed Land in the Green Belt (+605 to 1,000) and the Villages (+1,087 to 2,000) and Misc (+144 to 1,000). This therefore provides an overall 15 year increase from 12,426 to 13,770, giving a reasonable buffer to take account of unforeseen delays, etc.

## **D. Primary Benefits**

The primary benefits of this restructuring of the Local Plan's target numbers are as follows:

- A. The Town Centre is better utilised by an increase in housing numbers that reflects the demand for modern urban living. The planned retail facilities extension needs to be modified and downscaled in the light of current trends for online purchasing. (See the GVC Study for more information).
- B. Slyfield is accorded its revised target of 1,500 units whilst the 3 Green Belt strategic sites are subject to a review as to their suitability, sustainability and infrastructure concerns and the requirement for the exceptional circumstances to be found for them to be removed from the Green Belt.
- C. The target for any Green Belt development on all, some, or one of the sites is reduced to a maximum of 2,400 from 5,200 over the course of the Plan (excluding further reductions that are now made possible by the nett surplus of 1,344 units over the previous total).
- D. The potential for greater development to be spread more evenly across the urban areas, the previously developed Green Belt sites and the villages is realised in more proportional and balanced ways that avoid the unsuitable massing of large scale urban developments in essentially rural locations, where poor infrastructure is prevalent.
- E. The longer term future of the many rural villages in the borough will be enhanced by localised planning of small scale developments (including rural exception sites) so as to provide a means for younger people in particular to continue to live in their local areas. At the same time their continued local presence helps to maintain local vitality and local services provision.
- F. The many opportunities to find and utilise the wasted spaces in the town centre are activated on surface car parks, unneeded industrial units, derelict land, etc., and are exploited to their full, especially in areas such as the Research Park and the University Campus.
- G. The potential for redevelopment of previously developed Green Belt land is much more fully utilised across the borough and further work needs to be carried out to fully recognise these opportunities, both large and small and in each and every Ward.
- H. Ash and Tongham are given more time to incorporate their large increases in housing numbers of recent years and to assess further the potential, or otherwise, of future development, with a view to 5 yearly reviews as part of the LP process.
- I. The critical location of the former Wisley Airfield site is properly appreciated in terms of London's Metropolitan Green Belt and the sensitivity of such a large site being developed. (See Appendix C). The resultant effects upon the remaining buffer zones around the site and adjacent to the ring

of surrounding towns and villages such as Woking, Byfleet, Pyrford, Cobham, Leatherhead, Fetcham, Bookham, Effingham, the Horsleys and Clandons, Ripley and Send and ultimately, Guildford itself, needs serious consideration. The benefits of not developing in the Green Belt on such a sensitive site would thereby have a much wider benefit than just to Guildford. (See Appendix D for “The importance of the Metropolitan Green Belt avoiding further urban sprawl”).

- J. The benefits of a much reduced potential housing target for Gosden Hill and Blackwell Farm would help retain much more Green Belt than the current Plan. There would even be the potential to look for alternatives to major development of Green Belt sites as a whole or more suitable Green Belt sites which could come from the proposed sites review, at least for the first 5-10 year period of the overall Plan, whilst the scope for alternatives are fully studied.
  
- K. This restructuring should provide for more, smaller, sites to come forward in the earlier years of the LP to replace the later projected numbers on the large, strategic sites that are projected for the final 5 years. This rebalancing exercise would be beneficial to the overall Plan and to the ethos behind Local Plans in general.

## E. Footnote – The Insetting Anomaly of Ripley Village

In para 86 the NPPF refers to preventing development in a village “*primarily because of the important contribution which the **open character** of the village makes to the openness of the Green Belt, the village should be **included** in the Green Belt*”.

It is therefore perplexing to try and understand the logic behind the proposed insetting of Ripley Village, which is of a very open character (one half of the village boundary being Ripley Green which covers some 67 acres). 3 of the 4 primary roads out of the village quickly meet open rural countryside and the 4<sup>th</sup> is abounded by a mixture of set-back houses and open fields or woodland.

GBC were asked to review this policy and they have subsequently proposed to move the Ripley Green Belt boundary from its originally proposed position of half way across the open Green. As NPPF 85 states that boundaries should be clearly defined and use recognisable physical features that are likely to be permanent, they agreed that a small footpath was inappropriate.

However, on examination, their current proposal is even more strange (refer to the current LP for details). They are now proposing that the Green Belt boundary comes down Newark Lane, leaving one side in the Green Belt and the other inset, and then takes as its boundary almost the entire length of Ripley High Street, with all the houses, offices, shops, etc., on one side (the Green side) are left inside the Green Belt and all the properties on the other side of the High Street are inset, thereby effectively splitting the village in two by leaving 100+ properties to remain ‘Green Belt’ and the rest inset.

Hopefully the Inspector will find time to visit the village and see what this means ‘on the ground’ and he may consider recommending the entire village remains in the Green Belt, as seems appropriate in the circumstances.



**Extract from Pegasus GBC Green Belt and Countryside Study (April 2014)**

Updated Potential Development Areas for Villages only:

	<b>Available Hectares</b>	<b>Estimated Housing Units</b>
East Horsley	17.81	534
West Horsley	9.57	287
Send	7.21	217
Ripley	6.50	195
Shalford	5.81	174
Effingham	13.69	411
Pirbright	2.03	61
Fairlands	25.79	773
Normandy	5.80	174
Wood Street Village	6.07	182
West Clandon	16.85	506
Sendmarsh/Burnt Common	13.74	412
Farncombe	7.42	223
Flexford	18.88	550
Peasmarsh	4.25	128
Ockham	2.46	74
Chilworth	3.13	94
Gomshall	1.46	44
Shere	2.02	61
	<u>170.49 hectares</u>	<u>5,100 units</u>

**GBC Area Villages and Hamlets**

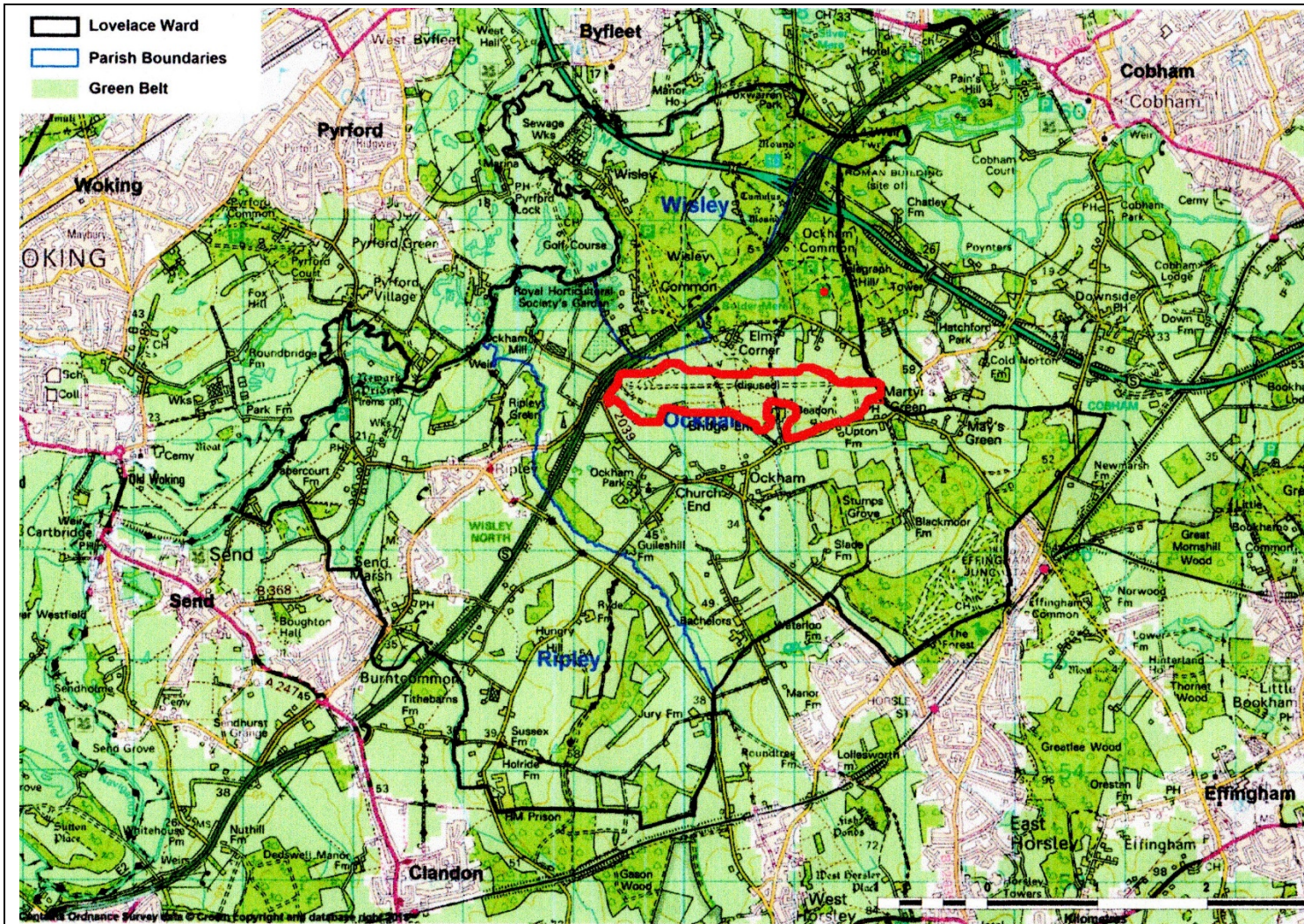
**Villages – 31**

Albury  
Artington  
Ash Green  
Chilworth  
Compton  
East Clandon  
East Horsley  
Effingham  
Fairlands  
Farncombe  
Flexford  
Gomshall  
Jacobs Well  
Normandy  
Ockham  
Peasmarsh  
Peper Harrow/Norney/Shackleford  
Pirbright  
Puttenham  
Ripley  
Seale and Sands  
Send  
Sendmarsh/Burnt Common  
Shalford  
Shere  
St Martha  
Tongham  
West Clandon  
West Horsley  
Wood Street Village  
Worplesdon

**Hamlets – 17**

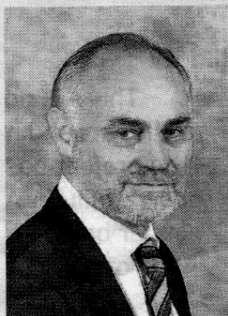
Binscombe  
Brook  
Burrows Cross  
Eashing  
Farley Green  
Fox Corner  
Hoe  
Hurtmore  
Little London  
Littleton  
Ockford  
Peaslake  
Runfold  
Wanborough  
Willey Green  
Wisley  
Wyke

**APPENDIX C**



**Distances from Airfield**

- Cobham – 1.5km
- Leatherhead – 7 km
- Fetcham – 5 km
- Effingham – 3 km
- The Horsleys – 1.5 km
- Clandon – 5km
- Gosden Hill – 5.6 km
- Guildford – 7km
- Send – 2.5 km
- Ripley - 1 km
- Woking - 2.5 km
- Pyrford – 1.5 km
- Byfleet - 2.5 km



**Reigate MP  
Crispin Blunt**



**The LMGB is currently under more threat than it has been since its inception, due to the imperative to build new homes and failures in the planning system which put unreasonable pressures on local authorities to provide new homes, whilst developers have 'land banked' sites for development in anticipation of rising property prices as they restrict supply.**

## OPINION

# London Metropolitan green belt is important to avoid urban sprawl

IF you look at a map of the London Metropolitan green belt (LMGB), you will see that most of Surrey lies within it. It is a crucial section of the green belt that surrounds London and prevents urban sprawl from London to the south and west.

Its dilution would have long-term implications for the entire concept of a green belt around London and the benefits that this brings to society.

The LMGB is currently under more threat than it has been since its inception, due to the imperative to build new homes and failures in the planning system which put unreasonable pressures on local authorities to provide new homes, whilst developers have 'land banked' sites for development in anticipation of rising property prices as they restrict supply.

The number of green belt sites around London under threat from development has more than doubled over the past year.

In response to this serious threat to our local environment, in partnership with the London Green Belt Council (LGBC) and the Campaign for the Protection of Rural England (CPRE), I have recently set up a London Green Belt All Party Parliamentary Group (APPG).

The group will develop policy thinking to influence the debate on housing and planning policy, with the objective of protecting the capital's green belt and achieving sustainable development.

This is not because I do not agree that the properly planned building of new homes is necessary to fulfil the needs of a growing population, but because pushing south eastern local authorities to permanently encroach upon the green belt does not allow for the sustainable national development of the type and density of homes we need.

In the green belt land is more expensive and it is much more lucrative for developers to build expensive four or five bedroom detached houses in large 'garden village' type developments than to explore options for smaller scale 'brown-field' or 'infill' developments containing a mixture of contained affordable and high-end housing that do not despoil green and open spaces, or continue feeding economic demand in the south at the expense of the north.

The APPG will also raise the protection of London's green belt as a planning priority, a position from which it has fallen in recent years.

A complete re-think of planning policy and the property development market is required, driven by national and local need, and local circumstances, with protection of the green belt, and the benefits it provides to residents in and around London, at its heart.