

For the attention of
Local Plan Consultation
Guildford Borough Council
Millmead
Guildford
GU2 4BB

Objection

to

**Regulation 19 Draft Guildford
Borough Council
Local Plan 2017**

20 July 2017

**Guildford Greenbelt Group
committee**

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SUMMARY

GGG objects to the Guildford Borough Council (GBC) Regulation 19 draft plan 2017.

In the view of the GGG committee it is not sound. The changes do not take account of previous objections including the 32,000 other valid objections that are shown on the GBC website as made to the previous 2016 version. In terms of appraisal of the Local Plan it is vital that those objections are fully regarded, since many have not been taken on board.

As requested, this response reflects only comments on changes to the previous draft; both in terms of new text and also comments on deletions which lack acceptable justification. This is as a result of a specific instruction as given by the GBC Executive that only comments on changes will be acceptable.

As a result, GGG requests confirmation that all of the objections to changes made below will be put to the Inspector appointed by the Secretary of State to review the GBC Regulation 19 local plan 2017 and also that all the previous objections to the 2016 draft plan made by GGG will be placed before the inspector and that when objections are fully taken into consideration the draft plan is amended accordingly and re-issued before it is submitted to the Inspector.

Guildford is a constrained borough. 89% of its area is zoned as permanent Green Belt. The road network that is already at capacity. We are concerned that GBC have adopted a lower but still grossly inflated OAN of 12,426 homes as a housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance.

Approximately 70% of the new development proposed in this plan is in the permanent Green Belt.

In the latest plan only 1,300 homes are going to be built in Guildford town which is some 10% of the total development proposed. It is very disappointing that GBC fail to set higher densities for the urban area and have in this latest draft deleted all reference to “density for development” which is normally an integral part of forward planning and development control.

GBC still fail to acknowledge that the application of constraints to housing need in respect of the Green Belt is a sensible and practical approach to development within the borough and is not only what they have done in the past in previous plans but is also what its neighbouring local planning authorities have done.

The current scale of the housing number proposed in this plan, which is based on a flawed SHMA, inevitably increases the onus for the plan to be seen to be sound. A substantially lower number of 4,000 homes, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

It appears that GBC have still failed to grasp the opportunity of following clear government policy to develop in the urban area on previously developed sites. Many of these sites are in their ownership and it would seem a practical and readily achievable alternative which is much more acceptable to local residents.

In the opinion of the GGG committee much of the updated local plan still appears out of date. Current trends in terms of property development such as the marked decline in town centre shopping centres and the need to create modal shift by developing residential uses close to transport hubs appear to have been overlooked.

Unsupported assertions that there is real demand for the expansion of retail, industrial or office space lack credibility especially in the absence of significant planned expansion of residential development in the town centre which is universally acknowledged as a key stimulant for urban economic health.

There would appear to be two worrying examples where GBC are taking the role of “developer/landowner” rather than “independent not for profit public sector planner” in so far that they have a pre-determined agenda for building on the Green Belt rather than acting as careful, professional and responsible planner guardians. Example 1: Policy A43 Garlicks Arch Burnt Common. The stated, albeit unproven, need by GBC is 400 homes. Normal residential density is 30 homes per ha. Land required would therefore be 13 ha. Land actually proposed to be allocated is 28.9 ha. This is more than double land required in beautiful irreplaceable Green Belt. Example 2: Burnt Common Policy A 53. The stated, albeit unproven need, is 7,000 sq m B1c, B2 and B8 development. Normal density 50% plot ratio. Land required 1.4 ha. Land allocated 9.26 ha. This is more than six and half times more land than necessary in valuable Green Belt which the planners should be looking after.

EVIDENCE BASE

GGG objects to the continued poor quality of the evidence base and lack of sound property market research that relates to the local market in Guildford rather than the continued reliance on generic economic capacity forecasts. As a result many of the submission documents providing key evidence are unsound, unreliable and inconsistent.

Key parts of the evidence base are flawed or based on withheld assumptions.

The latest SHMA 2017 still inflates the proposed housing figure due to the following factors:

An independent review by NMSS of the latest ONS population estimates and projections has found compelling evidence that there are substantial errors in

past estimates of student migration flows. It is probable that migration flows out of Guildford, both to other parts of the UK and abroad, have been underestimated by sizeable amounts.

Owing to the way in which migration estimates are used to construct population and household projections, the errors in past migration estimates are likely to mean that the latest demographically-based housing need estimates by GL Hearn overstate the number of homes needed by over 25%.

The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

38,357 sq m of B1c, B2 or B8 use class is a quite sufficient supply for the plan period and does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

The ELNA states “that a large proportion of the net additional floorspace and land requirements for both office/R&D and industrial/storage uses could be met through the permissions which have been consented but which have yet to be implemented. However, there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

“There is the possibility that some pipeline developments may not come forward” is patently a weak argument indeed for the proposed industrial development at Burnt Common in the Green Belt and expansion of the Surrey Research Park into the Green Belt which has unused consents dating back many years and also the substantial latent potential for an increased density of development. The current plot ratio is less than 25%. The reason that the unused consents have not been used up is simple. There is a proven lack of demand.

Exceptional circumstances clearly do not exist to justify amendments to Green Belt boundaries as part of the Local Plan process. It is quite achievable for realistically prepared and identified development needs to be accommodated in Guildford’s urban areas and villages.

The Carter Jonas Guildford Retail Study Update 2017 lacks credibility and there is no proven case for expanding comparison retail space which is undermined by failure to implement existing retail consents at the North Street development over the last 10 years. The Guildford Retail Study does not take account of changing retail patterns in relation to the threat of the internet and the “clicks and mortar” conflict. The study also assumes a number of logged retail requirements from companies already in liquidation or with national requirements that exclude Guildford.

WHY THIS PLAN IS STILL UNSOUND

Guildford is physically constrained being a gap town set in the Surrey Hills AONB and in Metropolitan Green Belt. Significant parts are affected by the Thames Basin Heath Special Protection Area. There are also notable areas of river, surface water, groundwater and surface water flood risk. Constricted road and rail routes converge to cross the downs seeking to avoid both high ground and floodplain. These compete with housing for land and there is no space for road widening or a conventional ring road approach.

The Local Plan process envisages that the housing target should be lower than the “objectively assessed need” if there are valid constraints. GBC have failed to apply any reduction which makes the plan undeliverable and unsound. We believe it would be harmful to the character, quality of life and economy of Guildford not to reduce the housing figure to a number significantly below 12,426 new homes by 2034. I submit it would be counter to sustainable development as a whole (in particular to living within environmental limits and achieving a sustainable economy) and contrary to policy to develop on the scale currently proposed. We are concerned that insufficient attention has been paid to cumulative impacts with constraints considered separately for each site.

In view of the extent of physical and policy constraints, the inflated SHMA figure, and the transport evidence indicating that the Plan would lead to congestion, the OAN figure should be 400 homes per annum and the housing target after the application of constraints should be in the range of 200 homes per annum and kept under regular review.

The extent to which the Sustainability Appraisal fails to test the sustainability of the spatial options in a meaningful way casts doubt over whether sustainability has been assessed. The report treats various major development sites in Green Belt, contrary to the importance attached to protecting Green Belt, as “a given”, fails to consider options that constrain

development or that make greater use of brownfield or previously released greenfield land, focuses on a range of options that involve developing on even more Green Belt around Guildford in order to protect Green Belt around Woking does not consider environmental limits or impact on the next generation in terms of weighing demand for homes for the young alongside the use of all possible last resort greenfield options by one generation.

Policy in relation to sustainable development has been changed in a way that runs counter to GBC's previous predetermined agenda for building on the Green Belt.

Under newly amended para 4.1.4 It is stated that "Local Planning Authorities are encouraged to include a policy within their Local Plan that embraces the presumption in favour of sustainable development. Policy S1 meets this requirement and adopts the model wording suggested. When implementing Policy S1, local circumstances will be taken into account to respond to different opportunities for achieving sustainable development. In accordance with the NPPF, the PRESUMPTION WILL NOT AUTOMATICALLY APPLY to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding. The National Planning Policy Framework requires that objectively assessed needs should be met unless: "any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted."

Under this amended policy it is clear that the OAN should be constrained.

The specific amended policy described above is of particular relevance to Guildford including sites protected under the Birds and Habitats Directives, Sites of Special Scientific Interest, Green Belt, Local Green Space, Area of Outstanding Natural Beauty, designated heritage assets and locations at risk of flooding. In this situation, is it appropriate for the Appraisal to rule out not meeting needs in full from a sustainability perspective?

Notwithstanding that the Sustainability Appraisal should be proportionate, strategic and look at significant matters, the assessment appears deficient and biased in the spectrum of alternatives it considers to the point that it is questionable whether it meets the requirements.

The plan fails to produce a coherent development strategy for Guildford Town. GBC has deleted its independently commissioned Town Centre Master Plan by the well renowned firm of architects and master planners

Allies and Morrison as a source document from the plan even though this master plan was previously well publicised and enthusiastically adopted by the Council.

Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2020.

DEFINITIONS AND SOURCES

NMSS is a consultancy company specialising in housing demographics whose principal is Neil McDonald a Management Consultant specialising in property strategy and research in the public and private sectors.

References to “local plan” are intended not to be the previous 2003 Local Plan but to be references to the current Regulation 19 draft local plan 2017 prepared by Guildford Borough Council.

GBC refers to Guildford Borough Council

SHMA refers to the Strategic Housing Market Assessment 2017 prepared by GL Hearn

OAN refers to the Objectively Assessed Need in relation to housing

NPPF refers to the National Planning Policy Framework

CPRE refers to the Campaign for the Protection of Rural England

GGG refers to Guildford Greenbelt Group

GRA refers to the Guildford Residents Association which comprises over 25 Residents Associations and five Parish Councils

ELNA refers to the Employment Land Needs Assessment 2017

NPPF refers to the National Planning Policy Framework

NPPG refers to the National Planning Policy Guidance

POLICY S1 SUSTAINABLE DEVELOPMENT

GGG supports the change to paragraph 4.1.4 “Local Planning Authorities are encouraged to include a policy within their Local Plan that embraces the presumption in favour of sustainable development. Policy S1 meets this requirement and adopts the model wording suggested. When implementing Policy S1, local circumstances will be taken into account to respond to different opportunities for achieving sustainable development. In accordance with the NPPF, the presumption will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

We are of the opinion in terms of clear policy that GBC have made a definitive statement to support the Green Belt. GGG is however disappointed that they have failed to put this policy into practice in forming this plan.

POLICY S2 PLANNING FOR THE BOROUGH

GGG objects to the amended policy S2 the Borough Wide Strategy and the commitment to build 12,426 homes based on the Strategic Housing Market Assessment (SHMA) 2017 prepared by GL Hearn because it has not addressed many of the 32,000 objections made to the 2016 plan.

The OAN “objectively assessed need” figure of 12,426 is far too high.

The committee of GGG are very surprised and concerned that GBC have adopted the OAN of 12,426 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50%.

Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development “because of the environmental constraints which exist in the County, including Green Belt”. This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years. It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the urban areas to accommodate this requirement.

However, it would appear that today GBC have effectively ignored the real potential of the urban area to provide for housing. At the same time GBC have adopted a radically different approach to the policy of the Council over the last 20/30 years and are now ignoring government policy in relation to the Green Belt.

A detailed and comprehensive professional review of the SHMA dated June 2017 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 560 homes per annum to 400 homes per annum.

The 19 page report by NMSS which can be found on the GRA website entitled “Review of GL Hearn’s Guildford Addendum to the West Surrey SHMA”. It was a real community effort. It was paid for by over separate 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing need figure presented in the Local Plan.

The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald who we were lucky to find. He is a niche consultant with the right skills and a national reputation. An independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit.

The NMSS recent study has found that the latest SHMA update by GL Hearn 2017 over estimates population growth for Guildford.

The report shows that an indication of the scale of the problem can be obtained directly from the ONS’s own data. Their estimates of births, deaths and population flows into and out of Guildford suggest that the population should have grown by 15,000 between the 2001 and 2011 censuses. The censuses, however, record a population growth of only 7,800. The discrepancy is over 90% of the population change indicated by the censuses.

The analysis in the NMSS report demonstrates that the errors must be in the population flows in age groups in which there are significant numbers of students. They are almost certainly the result of the under-recording of the numbers of students leaving Guildford each year.

If the projections are based on under-estimates of the number of students leaving the district each year, they will assume that people will be living in the area who will in fact have left. This means that they will over-estimate the likely growth in Guildford’s population. The ONS’s projections envisage that the population will grow by 21,700 between 2015 and 2034. However, if the estimates of past migration flows are adjusted to make them consistent with the census figures, this could fall to 13,000. As a consequence, the demographically-based estimate of the number of homes needed would be 400 homes a year (2015-34), not 580.

70% of the sites put forward in the Local Plan are still in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries.

Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements).

Constraints should be applied to the Objectively Assessed Housing Need (OAN). However this itself is overstated and should be reduced from 580 per annum to 400.

We object to the fact that GBC have not used the guidance available to reduce the number of houses they propose.

GBC has not taken into account the possibility of lowering the required number of houses by adhering to the restraints offered in various papers. Government guidelines, even before the publication of the Paper, quoted below say that if a Council cannot supply sufficient houses without impinging on the Green Belt, then they do not have to build so many houses.

GBC have gone against the NPPF as they are not adhering to the ruling that Local Plans must plan positively to seek opportunities that meet objectively assessed development needs and be flexible enough to adapt to rapid change unless any adverse impact of doing so would significantly outweigh the benefits or specific policies in the NPPF which suggest that development should be restricted.

House of Commons Briefing Paper ; Planning for Housing no 03741, 14 June 2017. Guidance on taking account of constraints. "Need alone, is not the only factor to be considered when drawing up a Local Plan". This includes "land designated as Green Belt" and "SSSIs".

"The framework makes clear that once established Green Belt boundaries should only be altered in exceptional circumstances" and "should take into account any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need." (P d055 ref ID.3-045-20141006

In view of the comments above it would appear logical to apply CONSTRAINTS in line with government policy to a corrected OAN. of approximately 50% to account for the fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major

infrastructure. This reduction is in line with the constraints percentage of 50% applied by Woking Borough Council.

This would result in a more acceptable and practically achievable HOUSING TARGET of 200 homes per annum which over a 20-year period would be 4,000 homes.

All of these homes could be built in the existing urban brownfield areas of the borough and would in part satisfy the 32,000 objections made by residents to the 2016 draft plan and also relieve the additional problems of inadequate infrastructure

POLICY H1 HOMES FOR ALL

We object to all changes in policy H1 Homes for all because they have not addressed many of the 32,000 objections made to the 2016 plan.

We object to the change by way of deletion of the paragraph on density: “New residential development is required to make the most efficient use of land whilst responding to local character, context and distinctiveness. Residential densities will vary dependent upon the local area context and character and the sustainability of the location. Higher density development will be supported in Guildford town centre.”

This indicates that GBC have no intention of building at a higher density within the existing urban area which is desperately needed and is in accordance with existing government policy. To have a plan with no density guidelines in the urban area is irresponsible and effectively very bad planning since it fails to exploit the development opportunities that urban areas can afford.

We support higher density development in the urban area close to transport hubs to facilitate modal shift e.g. 20 minutes’ walk of Guildford railway station. Much of Guildford town could usefully be regenerated with 7 storey blocks (there are currently blocks of this size already in the town) at 50 homes per ha with landscaping and underground parking, as often seen on the Continent and, recently, in London.

We object to the change in relation to student accommodation: “About 60 per cent of full time Guildford based on the University of Surrey eligible students population (full time equivalent) are expected to be provided with student bedspaces on campus.”

The University should provide accommodation for 100% of new first year students and more than 60% of existing students. This would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. Surrey University has 17 ha of car parks that could provide all the student accommodation required on stilts with parking beneath.

We object to the change in relation to Gypsy, Traveller and Travelling Showpeople pitches and plots. Guildford borough already has a higher

proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.

We object in particular to the inclusion of 6 Travelling Showpeople pitches at Garlicks Arch where there is no proven need.

We object to the deletion of the paragraph 4.2.8 on density: “We have a responsibility to use our natural resources, such as land, wisely. Efficient use of land is essential. Housing density describes the number of homes developed within a particular site area. It is usually calculated by the number of dwellings per hectare (dph). Increasing densities can help to reduce the land needed for new homes and make development more sustainable. It can also support more facilities and services. Certain areas can accommodate higher densities provided there is no adverse impact on the character of the area and the infrastructure is able to cope. Planning applications will be assessed on a case-by-case basis having regard to the local context, character of the surrounding local area and the sustainability of the location. This will include consideration of established street patterns, plot sizes, spaces around buildings, and relationship with nearby buildings as well as form, massing, height of existing buildings and structures, and materials.”

To have a plan with no clear density guidelines is irresponsible and effectively very bad planning since it fails to exploit the development opportunities that urban areas can afford.

POLICY H2 AFFORDABLE HOMES

We object to the changes in policy H2 Affordable homes which still do not go far enough to address affordable or social housing need.

“Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people.

In addition, “the viability clause” means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.

This policy’s version of “affordability” is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

GBC has failed demonstrably to provide any significant social housing. Over the last 2 years a tiny 65 units have been built. GBC may have demonstrated a pre-determined agenda to build large numbers of high priced executive boxes for Londoners in the Green Belt but key workers such as nurses and teachers have been ignored. Opportunities for local not for profit social housing schemes, borrowing from the public sector at low interest rates and using existing GBC land holdings are extensive. But the political persuasion and intent of GBC does not seem to really want to accommodate local people in need. This is a great pity.

POLICY H3 RURAL EXCEPTION HOMES

We object to the change in policy H3 Rural Exception Homes.

We object to the deletion of para 4.2.51 “ To ensure that the housing is secured permanently to meet local affordable housing needs, we will require the affordable housing provider to enter into a planning obligation with cascade provisions. This requires the housing to be allocated to people with a local connection to the parish (through residence, employment or close family), followed by those with a local connection to adjacent parishes within the borough who meet the criteria, and finally those with a connection to the borough of Guildford in accordance with its published scheme Guildford Homechoice (or equivalent scheme).”

This demonstrates GBC’s disregard for local housing need.

POLICY P1 AONB

The policy relating to Surrey Hills AONB weakens the protections offered, and (unlike previously) does not have restrictions on non-major development. This is a move in the wrong direction. Previously all proposals were considered against the 5 key tests – now development in the AONB seems to be more acceptable.

This is **weaker**, not stronger, and is contrary to huge responses from the public in previous consultations and the weight of protection given to AONB in the NPPF.

We OBJECT to the loss of the five tests which were previously included. Previously it was suggested that all proposals should be considered as to whether they

- Conserve or enhance the setting and views of the AONB
- Conserve wildlife, historic objects or natural phenomena within it
- Promote its enjoyment by the community and visitors to the area
- Support the rural economy of the Surrey Hills area
- Provide or maintain public access to the AONB

These tests are significant and important and the loss of these tests is a serious diminution of the protection afforded to the AONB. They should be reinstated.

Similarly the deletion of the presumption against inappropriate development means that inappropriate development is not necessarily going to be rejected – which would seem to be in contravention of the policies and the principles of the AONB, which the borough council has a duty to protect. This too should be reinstated.

POLICY P2 GREEN BELT

We object to the changes to Policy P2 because they have not addressed many of the 32,000 objections made to the 2016 plan.

We object to the new para (1) “The Metropolitan Green Belt will continue to be protected as shown designated on the Policies Map, against inappropriate development. In accordance with national planning policy, the construction of new development will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated.” The words “as shown designated on the Policies Map” should be deleted. The Policies Map has effectively ignored huge areas of Green Belt protection and the new para (1) is therefore a sham.

We object to the proposed change that Send Business Park should be inset from the Green Belt due to the fact that:

It is effectively a non-conforming user in an area of beautiful countryside adjacent to the beautiful Wey Navigation

It has restricted access along Tannery Lane

It should not be given the opportunity for further expansion or development

Policy P2 still completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework

(NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world.

Policy P2 omits any assessment of the Green Belt's value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital.

It is quite incorrect to argue, as the Council do, that the plan would involve the loss of "only" 1.6% of the borough's Green Belt. In reality the figure is nearer 7% when inseting, infilling and settlement boundary extensions are included. More importantly, there is no "acceptable" percentage (in the NPPF or anywhere else) of Green Belt that may be sold. No-one argues that we should sell 1.6% of the Crown jewels in order to build houses.

We object to the statement in the Draft Local Plan under Green Belt Policy P2 (4.3.13) which claims that 14 villages are "now inset from the Green Belt".

This statement is untrue as GBC is proposing to "inset" these village. No decision has been made by an Inspector, therefore the villages remain in the Green Belt.

We object to the changed "insetting" of 15 villages (including Ripley) from the Green Belt, and at "infilling" 12 of the borough's Green Belt villages.

We are deeply disturbed that settlement boundaries are to be hugely extended in many villages (including Send) and that infilling is also proposed outside the settlement boundaries of 11 further villages. This is completely unplanned and unmeasured development outside of the OAN.

Many Guildford villages are "leggy" in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the "openness" of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF's other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hell bent on self-defeat.

Many of the local village should not be removed from the Green Belt. Send, for example, provides an important Green Belt buffer between Woking and Guildford. The village and the countryside behind the A247 should all be protected.

- 1.1 **We object to three particularly vulnerable areas of high quality amenity land being taken out of the Green Belt at Send which include:**

The land behind the schools including playing fields and woodland.

The land to the right of Cartbridge by the River Wey Navigation up to the new boundary fence with Vision Engineering.

Land to the left of Cartbridge going up to the old depot on the Wey Navigation.

POLICY P4 FLOOD RISK

We object to the changes in policy P4 Flood risk and water source protection zones

Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as Woodbridge Meadows Industrial Estate and the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented. It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside.

We strongly believe that this policy should not be used as a convenient excuse not to build on the extensive area of brownfield sites between the station and Ladymead. Any new development in this area could easily be built on stilts with flood resistant ground floor parking in areas that are identified as high flood risk. This area has been built over successfully over the last 50 years. We do not need to stop now.

POLICY E1 SUSTAINABLE EMPLOYMENT

We object to the change in Policy E1 sustainable employment because they have not addressed many of the 32,000 objections made to the 2016 plan.

We object to the inclusion of Send Business Centre/Tannery Studios Tannery Lane, Send in relation to proposed inset from the Green Belt because:

- It is effectively an old non-conforming user in an area of outstanding countryside
- It is adjacent to the beautiful Wey Navigation
- There is highly restricted vehicular access along Tannery Lane in both directions
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate.

We object to the change in Policy E1 of proposed designation of Burnt Common as an Industrial Strategic Employment Site.

- It was deleted from the 2014 draft because of all the local objections made previously and there is no logical reason to go back on this decision
- The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land as shown in the Employment Land Needs Assessment 2017
- There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have many empty sites and industrial units
- The 2017 Employment Land Need Assessment shows a reduction in demand to a low of 3.7 and a high of 4.1 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Burnt Common in the Green Belt
- There are patently no exceptional circumstances in terms of demand for employment space to build on this important area of Green Belt which effectively separates existing development in Send and Ripley and prevents urban sprawl
- The impact on small surrounding roads will create traffic gridlock
- It will join up existing villages and defeat the purpose of the Green Belt

We also object to the potential inclusion at Burnt Common of a waste management facility mentioned at the change to paragraph 4.423a which lacks sufficient detail for proper consultation and is completely inappropriate

We object to the ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 which generally is superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been

undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space.

We object to the fact that no reliable analysis has yet been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC and no robust assessment of local market demand apart from fairly brief references to freely available market research undertaken by commercial estate agents such as Lambert Smith Hampton covering a much wider area.

GBC in their role as a Planning Authority appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of procurement of useful property market research analysis or forward planning.

What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 generates at least 5 times as much employment as B8.

The lack of appreciation by GBC as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. E.g. the creation of a research and development park linked to the University but now has the threat of being downgraded into a general business park (see below).

Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan.

The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

38,357sqm of B1c, B2 or B8 use class is quite sufficient supply for the plan period and does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion

cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

Little regard is still not given to the opportunity of specific B1 b space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub.

We support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the funding necessary to pay for the infrastructure and environment this sort of industry requires.

We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. So i should target high added value small and medium sized enterprises rather than the headquarters of larger corporations.

We need to promote the idea of new knowledge transfer in incubator units and small premises for new start up enterprises. They need to be on the wave of innovative new technology as opposed to older established businesses.

POLICY E2: LOCATION OF EMPLOYMENT FLOORSPACE

We object to the change in policy E2 under paragraph 4.4.23a in relation to development involving waste management facilities to be directed to the Industrial Strategic Employment Sites.

- This fails to provide sufficient public consultation in relation to access and traffic flows
- This fails to provide sufficient public consultation in relation to unpleasant aspects of waste management

POLICY E3 MAINTAINING EMPLOYMENT CAPACITY

We object to the changes in relation to Policy E3 maintaining employment capacity which do not take account of my previous objections to this policy

We object to the ill-informed policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land. It is also contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).

POLICY E4: SURREY RESEARCH PARK

We object to changes in policy E4 Surrey Research Park which is still earmarked for excessive expansion which is not supported by the findings of the Employment Land Needs Assessment 2017

We support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. We object however to the completely unnecessary expansion of the Research Park into a larger Business Park.

We object to the extension to the Research Park of over 10 hectares will be delivered. This I understand will provide a total capacity of around 35,000 sq m of additional floorspace, of which 30,000 sq m is expected to be delivered in the plan period. This expansion is not effectively supported by evidence for an increase in B1b use class under the Employment Land Needs Assessment 2017.

We also believe that B1b (should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. We also object to the inclusion of B1c light industrial uses which is inappropriate and unnecessary.

Research parks based on the early UK technology transfer exemplars of the Cambridge and Oxford need careful monitoring, nurturing and protection to ensure the integrity and quality of the park is maintained and the park continues to be a destination for innovation and enterprise

There is a danger for research parks to be overwhelmed by short sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in time turn them into standard business parks which can be found anywhere in the country. Their relative low density and attractiveness make them targets for “any other” office user

Research parks that lose their way stop being the location of choice for new innovative enterprises.

The Surrey Research Park in Guildford needs to be focused on a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence, robotics and super-manufacturing

Monitoring indicators should include new start-ups and new patents created

Facilities should be provided whereby new small businesses can secure premises under subsidised licence fee arrangements with no onerous rent or lease commitments

The Surrey Research Park currently extends to 65,000 sq m

The research park is developed at a plot ratio of 25%. This could be increased to 50% within the same footprint of the existing park without damage to its amenity. The actual current land use for development in the park is in fact only 12.5% because most buildings are 2-storey.

POLICY E7 TOWN CENTRE

We object to the changes in Policy E7 Guildford Town Centre

We consider that policy E7 is still very ill-informed and there is insufficient evidential support to objectively assess the capacity of the existing town centre to accommodate appropriate new development and therefore fails the requirements of Section 161 of the NPPF to assess the real quantitative and qualitative floor space needs.

Policy E7 is still an aspirational voice from the past and is unlikely to benefit the health of the town centre in the future. There is no reliable evidence provided that the retail core of the Town Centre needs or can be expanded by 41,000 sq m of retail space at North Street because of lack of demand for retail units in the Town Centre particularly large units. This is due to falling demand for retail space in Guildford and town centres throughout the country evidenced by independent research and the reality of empty shops in many high streets (including Guildford) and the accelerating competition from internet shopping.

The recent Carter Jonas Study Retail Study 2017 update predicts total demand for Guildford Town Centre by 2020 at only 3,313 sq m and only 34,811 sq m by 2036. We have now been waiting some 15 years + for demand to catch up to enable development of North Street where the old consent for some 40,000 sq m of retail had to be renewed because it was getting out of date. Are we now going to have to wait till 2036 only another 19 years for demand to get to the point to enable development of this much prized site which developers have not exactly been falling over themselves to develop. That is also assuming that all retail demand in the Town Centre is wanting just this site.

However optimistically and quite illogically they protest that “there still remains significant capacity to support new comparison goods floorspace over the plan period”. It’s a bit like saying in town x we have currently 100,000 m of shopping and the UK retail forecast done by Experian shows that we can predict a growth of 10% therefore this means we must have an additional 10,000 sq m in town x. This is unscientific guess work.

In table 2 Appendix 6 of their report we learn that there is a potential for turnover to reach £856.3m in the town centre by 2020 however actual committed floorspace take up accounts for only £1.3m of this. This is 0.15%. It is hardly surprising that there are no details of take up or real demand evidence given anywhere in the report.

The Carter Jonas report is based on broad brush retail capacity forecasting derived from work by Experian which is very far from site or location specific and as a retail supply and demand assessment in my view is totally unreliable. The source is not even Guildford specific or even Surrey specific. The authors of the report do not disagree with my cynicism with capacity forecasting since they state up front that “It should be noted at the outset that capacity forecasts carried out over a long period of time are inherently less certain and should be treated with caution” and repeated again “at the outset we advise that all capacity forecasts beyond a five year period should be treated with caution. This is because long term trends in the economy, consumer demand and retail property market could have a significant impact on the potential capacity and need for new retail floorspace. For example, as discussed previously, a higher growth in non-store retail sales (i.e. Internet sales) than forecast by Experian would reduce the capacity for new retail floorspace over time.”

The Carter Jonas report is a vague whitewash report for a pre-conceived and outdated concept of increased retail development in the town centre. “For comparison goods, we have assumed the same estimations for convenience goods expenditure ‘inflow’ (10%) for Guildford Town Centre, again based on the centre’s role as a popular shopping and visitor destination.” Coming to the vague conclusion that Guildford is popular is far from reliable property market research.

The closest thing I can find to evidence of actual demand in this report is to read “In addition to focusing their attention on larger, dominant centres, many of the multiples and traditional high street retailers are changing their store formats and locational requirements. For example, key anchor retailers such as Boots, Next, Mothercare, TK Maxx, John Lewis and Marks & Spencer are actively seeking larger format units to showcase their full product range and to provide an exciting shopper environment backed by the latest (digital) technology.” But this statement applies to any of 100 centres in the UK. We are concerned as to whether the authors of this retail study have actually visited Guildford or know where it is?

In their 2014/2015 reports Carter Jonas provided a fairly inaccurate picture of retail demand (originally Appendix 6) with the inclusion of retailers who had either gone bust or actually specified demand requirements in centres other than Guildford. This I note has now been deleted presumably because of its inaccuracies which were dealt with in my 2016 objection and has not been updated. We are now left with no demand assessment from either small, medium sized or large retailers. This does not support the view that Guildford is a vibrant retail destination requiring expansion with a large retail development in North Street.

The reality is that the town centre has enough retail floor space. If more is introduced it will result in the closure of existing shops particularly in locations which are less than 50% of peak Zone A or 100% positions. What Guildford needs is a new focus on speciality high quality comparison shopping supported by a revival of Guildford's attractive heritage core and a new major visitor attraction supported by restaurants. Guildford needs to become the quality shopping destination for Surrey.

The existing site in North Street should be replaced with a well-designed ground floor high quality speciality retail mall and frontage of no more than 40 shops extending to 10,000 sq m with the rear and upper floors providing an additional 600 homes. The proportion of the above proposed smaller scheme at North Street will be complementary to and not antagonistic to the Upper High Street, Tunsgate, the Debenhams site and the 100% Zone A positions of the Lower High Street. If the existing policy under E7 is adopted the North Street site will remain empty for another 10 years.

We also object to the continued failure of this policy to provide much needed substantial residential development in the Town Centre which is still only a modest target of 1,300 homes. Only approximately 10% of the total planned for the Borough. There is still a blind overconcentration on retail expansion which fails to take account of market forces and a complete failure to grasp the reality that a residential expansion is required to stimulate retail/leisure demand in the Town Centre which is markedly losing out to nearby centres such as Woking which has a very different approach. See the Town Centre Opportunity in next section.

We object to the deletion of the vision statement "Guildford town centre has a unique setting and historical character, and is at the centre of one of the most prosperous counties in England. We will protect and build on these assets and insist that all new development will be of the highest design and environmental standards. We will be proactive in building a great town centre which connects to the amenity of the riverside. We will invest in creating high quality public realm. We will put people above traffic and we will promote new high quality retail and business development. To achieve this we will develop innovative funding and delivery bodies. As we embark together towards this exciting future we pledge that we will continue and extend an active dialogue with our residents and other stakeholders." Guildford Town Centre needs a decent vision. Without a vision the Town Centre is flying blind and it demonstrates the failure of the potential for imaginative Town development in this latest draft plan.

We support the deletion of paragraph 4.4.86 since many of the sites along the River Wey are capable of full development

We object to the deletion of the Allies and Morrison Masterplan as a source document for the plan since although it failed to fully exploit the development potential of the Town Centre it did include many good ideas including more extensive brownfield development extending to 2551 homes including Woodbridge Meadows as a residential development site.

We do not consider that the modest target of 1,300 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact. What the town centre needs in terms of urban regeneration is much more residential development. As can be seen from the previous section, retail will not work!

The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which was originally adopted by GBC. The reality is that the Town Centre and other areas of brownfield in the borough has the capacity for at least 5,000/ 7,500 homes.

The additional target capacity of 5,000 could easily be provided within the following urban sites which have the capacity for 7,500 homes:

- 2,500 homes detailed in Masterplan 2015 including Woodbridge Meadows which can itself be increased substantially
- 500 homes at North Street
- 1000 homes on current GBC car parks (25 acres) and at the station
- 1000 homes saved in the urban area if 100% of students are accommodated on Surrey University campus (17 ha of car parks)
- 1000 homes at Slyfield on the 40 ha regeneration site
- 1000 windfall infill (50 per annum)
- 500 homes on brownfield sites in villages on sites of max 1ha which do not impact Green Belt

Yes, we need a new Local Plan for our borough in order to provide a development strategy within which we can accommodate our local housing, economic and environmental needs. But first we must make 100% use of our urban brownfield in the town before we consider building in the Green Belt or countryside.

Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy that states clearly. “We are committed to a brownfield first initiative whereby all applications on previously developed land

are given fast track priority and every facility to promote development for residential purposes and employment purposes in order to satisfy the needs of local people. In parallel a zero CIL incentive should be given for all residential development on brownfield land.

POLICY D1 MAKING BETTER PLACES

We object to the change by way of deletion of paragraph 4.5.8 : “We will expect development to respond to local character and history, reflecting the identity of its context whilst allowing for innovative and forward thinking design....

There is no reasoned justification for this deletion and its omission will not make places better.

POLICY ID1 INFRASTRUCTURE AND DELIVERY

A new Transport Topic Paper has been published by GBC. Items 3.16 and 3.17 (page 10) mention Highways England concerns regarding the Strategic Highway Assessment Report 2016 and two letters. These letters can be accessed from the “Get Involved” website by searching for the Highways England response to the consultation. It seems clear that further modelling will be undertaken before the Examination and it also seems unlikely that it will be consulted on. We consider that any further modelling should include more detailed information so that it can be subject to scrutiny by GBC and the public.

The wording of ID1 has been amended to give an impression that provision of adequate infrastructure will be enforced. However, the reality is that GBC will not determine the required infrastructure. It will be determined by Surrey Highways for the local road network and they are required to support development – not put obstacles in the way. If the Strategic Highway Assessment Report is anything to go by, the requirements will be understated or not even recognised. Transport assessments supporting planning applications will be prepared by consultants acting for, and remunerated by, the applicant. Improvements to the strategic road network (e.g. A3) will be determined by Highways England, budget constraints, and ministerial decisions.

Cllr Furniss has stated that the proposed Blackwell Farm development will not depend on A3 widening (in response to a question from Karen Stevens to the Executive Advisory Board meeting held on 20 April). It seems likely that Highways England have felt the need to offer a reality check on the likelihood of major work on the A3, such as widening or a tunnel, in the foreseeable future – apart from improvements to two slip roads.

The policy states that infrastructure will be secured by planning condition and/or planning obligation but this will require enforcement and we doubt the ability and willingness of GBC to overcome developers’ viability arguments. For the permissions that require a longer timescale there could be non-delivery issues if the original developer abandons the project without fulfilling all the conditions and obligations. Item 4.6.8 still indicates that GBC will be prepared to

reduce infrastructure requirements by negotiation. I.e. viability for the developer will take precedence over infrastructure.

No change has been made to the monitoring requirement which is based on CIL receipts and spending rather than actual, and timely, delivery of infrastructure.

We object to the new Guildford Borough Council Transport Strategy 2017.

We object to ASP 3 new A3/A3100/B2215/A247 Burpham-Burnt common all-movements junction, formed by a new connector road linking between new A3/A3100 Burpham junction (SRN4) and the B2215 London Road, in combination with the new A3 northbound on-slip (SRN9) and the new A3 southbound off-slip (SRN10) under Infrastructure and Delivery.

If development gets the go ahead for the strategic site at Gosden Hill it would be logical to construct a 4 way A3 interchange at Burpham. The A247 link road to Woking already at capacity will become gridlocked.

We object to SRN4 New A3/A3100 Burpham junction with relocated A3 southbound off-slip and new A3 southbound on-slip. This will place an unbearable problem onto the A247 whereby traffic will be passing directly through Send from the A3 and M25 and the proposed new development at Wisley.

We object to SRN9 A3 northbound on-slip at A247 Clandon Road (Burnt Common) and SRN10 A3 southbound off-slip at A247 Clandon Road (Burnt Common). This will place an unbearable problem onto the A247 which is already at capacity

POLICY ID2 SUPPORTING THE DEPARTMENT FOR TRANSPORT'S ROAD INVESTMENT STRATEGY

The removal of item 4.6.17 is puzzling. In the rationale for changes it is described as a potential statement of common ground with Highways England. It is not clear whether GBC believe that it is likely to be agreed nearer to the plan Examination – but once again it highlights the lack of control over key roads infrastructure in formulating the Plan.

POLICY ID3 SUSTAINABLE TRANSPORT FOR NEW DEVELOPMENTS

Item 4.6.20 makes a statement that is clearly at odds with the choice of sites which will generate a major increase in private motor vehicle journeys.

Appendix C Infrastructure Schedule

The earliest dates for the railway stations at Park Barn and Merrow are not expected before 2024 (six years later than first anticipated).

Two road safety schemes for the A3 have been abandoned.

SCC appear to have washed their hands of involvement in the delivery of a number of highway developments on the local road network (which is their responsibility).(E.g. those in LRN7).

LRN7 (For Wisley Airfield) is an example of inadequate infrastructure requirements to address the problems that would be created by a strategic site.

POLICY ID4 GREEN AND BLUE INFRASTRUCTURE

Biodiversity Opportunity Areas (BOAs) seem to have been heavily influenced by the proposal of new identified settlement boundaries, in this draft local plan. The proposal in themselves have not been fully considered; they threaten landscape and biodiversity.

Biodiversity will be seriously damaged. by the many greenfield development sites proposed. We are suspicious of the use of the phrase “where possible”, which is a let-out.

Important habitats for biodiversity (outside BOAs) include many which are not adjacent to BOAs. There is no proper concern for protection of such areas.

4.6.45 is misleading. The primary ostensible role of SANGs is to divert recreational use, and dog-walkers in particular, away from the TBHSPA.

It is extremely doubtful whether new SANG will achieve its primary purpose. For example, dog walkers are being encouraged to use sites occupied by ground-nesting Skylarks. It is wrong to claim, in effect, that SANG will produce net gains in biodiversity when it will be used to justify the destruction of existing wildlife on greenfield sites by building on it.

Land used for SANG should be made attractive in order to divert recreational use away from the SPA; but this cannot be achieved by a SANG which is adjacent to the SPA or many of the sites proposed.

We object to the introduction of 4.6.49a which appears to be an afterthought to weaken the policy.

Existing biodiversity and recreational use is being ignored by Guildford Borough Council and developers in selecting sites.

In practice, SANG is being used in order to avoid any restriction on housebuilding due to the SPA; and is effectively a Trojan horse. Furthermore, all such sites are by definition already green spaces with either biodiversity or recreational uses.

POLICY A25 GOSDEN HILL

We object to the changed policy A25 Gosden Hill for the development of 1700 homes. Deferral of the target number of homes by 300, to be built after the

plan period, is effectively just a smoke and mirrors exercise. This housing is still being allocated.

There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt.

The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green. Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Ripley through to Guildford.

The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.

We object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England's requirement of 2km.

POLICY A26 BLACKWELL FARM

We object to the changed policy A26 Blackwell Farm for 1500 homes which is still far too much. As for Gosden Hill, the deferral is not a genuine reduction but merely a presentational exercise.

There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of Green Belt, and fulfils purposes 1, 3 and 5 very strongly.

The site is dependent on a new access road from the A31 (Hog's Back) to the Hospital roundabout at Egerton Road, with a new signalised junction on the A31 at Down Place (just east of the A3 slip road). An independent traffic study commissioned by the Parish Council has shown that this new junction would result in more queuing on the Hog's Back and on the A3 during the morning peak-hour, and as a result the villages of Puttenham, Compton and Artington will see a surge in traffic numbers as Guildford-bound drivers seek out the fastest route and divert along the B3000, B3100 or Down Lane.

Levels of nitrous oxide that are consistently well above the EU legal limit have been recorded at the A3 end of the B3000 over the last 2 years (GBC Air Quality Annual Status Report, September 2016). Compton Parish Council is expecting that this section of the B3000 will be made an Air Quality Management Area soon. Any traffic intervention that increases traffic levels through Compton (such as the proposed access road to Blackwell Farm), will make this situation worse and potentially have an impact on the health of residents.

The development will result in the loss of nationally important countryside - The new access road would cut through the Surrey Hills Area of Outstanding Natural Beauty (AONB), uprooting centuries old trees and scarring the north face of the Hog's Back. It would also pass through an Area of Great Landscape Value and through, or next to, a belt of ancient woodland. The housing development itself and the proposed extension the research park, would harm the setting to the Surrey Hills AONB (the views into and out of the Hog's Back ridge). The development site includes high-grade farmland and forms 20% of Compton's green belt.

The development will produce more congestion at the Hospital/Tesco roundabout - This will impede access to the Hospital's A&E unit - a problem was identified by the Planning Inspector who presided over the previous Local Plan and who put a cap on traffic increases in the area of 5%. That cap has been exceeded (despite the University's claim that construction traffic and buses don't count). Guildford's underlying traffic modelling is flawed and simply tweaking the Hospital roundabout and/or providing a new rail

halt at Park Barn will not mitigate against the traffic generated by 1,800 homes, two schools, and an extended business park.

The new road proposed would be inadequate for the volume of traffic, and once the development has been built out it wouldn't be long before new roads were required to serve the new population, which would inevitably pass through Wood Street Village (adding to the congestion in Worplesdon and potentially ruining Wood Street Village Green) and/or through Flexford/Wanborough, potentially ruining the conservation area of Wanborough, with its 13th century church and 14th century barns.

The development will result in more flooding. The Hog's Back acts as a soak away for surface rainwater. Once its slopes are concreted over, this water will travel north, adding to existing flooding in Wood Street Village, Fairlands and Whitmore Common (a European protected habitat)

POLICY A35 WISLEY

We object to the changed Policy A35 Wisley in respect of the identified mitigation to address the impacts on Ripley High Street and surrounding rural roads comprises two new slip roads at A247 Clandon Road (Burnt Common) and associated traffic management. This will not in any way mitigate the impact on Ripley High Street since traffic will need to pass through Ripley to reach Wisley.

Previous objections therefore still stand for this changed policy concerning the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee unanimously rejected a recent planning application for precisely this development on 14 separate grounds. This deceived many residents into thinking that it has been defeated.

There is in any case no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

This is not an NPPF "presumption in favour of sustainable development" but a predetermined bias in favour of specific applicants, who had already been given many additional months to refine their application before it was rejected. Residents are disturbed by apparent political links between the

ruling Conservative group on the Council and individuals connected to the developers, a shadowy Cayman Islands company.

Policy A35 should be deleted from the plan for all the reasons the development was rejected by the Planning Committee, including:

- 1. Green Belt location and absence of “exceptional circumstances”.**
- 2. Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.**
- 3. Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).**
- 4. Proximity to A3/M25 bottleneck and Ripley village and roundabouts.**
- 5. Absence of adequate traffic data.**
- 6. Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.**
- 7. Loss of high-quality agricultural land (55% of the site), in breach of national policy.**
- 8. Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.**
- 9. Presence of a Surrey County Council safeguarded waste site.**
- 10. Cost of infrastructure required to the detriment of alternative more favourable sites.**
- 11. Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.**
- 12. Impact on listed buildings.**
- 13. Difficulty of SANG siting and inability to divert residents and their pets away from the SPA.**
- 14. Extreme housing density with tiny garden spaces.**
- 15. Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse**

light pollution, noise and traffic, and competition for local amenities and infrastructure.

- 16. Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).**
- 17. Failure to evaluate the cumulative impact of this and nearby development sites on the area.**

POLICIES A36 to A41

We object to the changes to Policies A36 to A41 (East and West Horsley)

The number of potential development sites has been reduced by two (A36 and A41, representing a total of 138 dwellings). This leaves four sites (A27-40) which still represent a total of 395 new dwellings.

Marginal changes such as these would still leave 70% of all new development in the borough built on Green Belt sites. No “exceptional circumstances” or any other justification is advanced for this strange imbalance.

The deletion of two Horsley sites fails to correct the issue of relative overdevelopment in East and West Horsley, which is both excessive in absolute terms and disproportionate in relation to the rest of the borough.

No attempt is made to assess the cumulative impact on the Horsleys – either of the four sites now proposed, or of Site A35 (Three Farms Meadow, alias “Wisley Airfield”), with over 2,000 new homes only 2 miles away. This piecemeal approach leaves the future of the Horsleys at the mercy of ad hoc planning applications, which is the opposite of what a Local Plan should intend.

The new plan Policies put greater emphasis on the need for adequate facilities and infrastructure to underpin development. But this is not reflected in any new wording on the Horsley sites, thus leaving most local objections unaddressed. Again, this defect curtails the plan’s usefulness as a practical planning tool at a site level and undermines its credibility among residents.

The plan fails to mention most of the known sustainability issues and infrastructure constraints affecting the Horsley sites, including public transport, traffic, road safety, parking, schooling, medical facilities, sewage,

flooding/surface drainage and shops. These were fully set out in responses to last year's public consultation.

The density of new housing on the four Horsley sites too is inappropriate, being greater than anywhere in the locality at present.

Sites situated on the periphery of existing development in the Horsleys encroach on surrounding open fields and require the extension of settlement boundaries. The plan presents no arguments for this which, contrary to NPPF paragraph 79, will contribute to creeping urbanisation by attenuating the Green Belt corridors separating the Horsleys from neighbouring settlements.

Collectively, the four Horsley sites breach NPPF paragraph 81's encouragement of access to the Green Belt and its amenity and recreation value. This has been an outstanding success story in the Horsleys, as detailed in response to the last consultation. Assets include a dense public footpath network, parish parks, sports fields, a campsite of international standard, Britain's newest rural opera theatre and the popular Olympic cycle route. These examples of positive planning depend on a Local Plan that protects the Green Belt, maintains its openness and beauty and avoids urbanisation and traffic congestion. Sites A35-41 are hostile to this.

POLICY A42 CLOCKBARN NURSERY

We object to the changed policy A42 Clockbarn Nursery to 60 homes.

It ignores all the hundreds of previous objections made by local people

The increase to 60 homes in place of 45 homes is 33% more and too much.

It will worsen access and traffic problems in Tannery Lane and at the A247 junction.

It will make erosion of Green Belt worse

It will make surface water flooding, which is already bad, even worse

It will impact open countryside views from the River Wey Navigation

The site is part of the permanent Green Belt at Send and should remain undeveloped in order to preserve the amenity of the surrounding area.

The site has very restricted access along Tannery Lane which is narrow and for most of its length only capable of providing access for cars in one direction. Development of the site is not therefore sustainable or practical.

Tannery Lane already provides access to a Business Park which generates a considerable amount of traffic at all times of the day including lorries. This narrow country lane cannot cope with any more traffic.

Planning consent has already been granted, rather unwisely given the access problems, for 84 flats and a marina. Any more development at this location would not be sustainable.

The junction with Send Road has poor visibility and is dangerous for traffic entering and leaving Tannery Lane.

POLICY A43 GARLICK'S ARCH

We object to the changed policy A43 Garlick's Arch for 400 homes and 6 travelling show people pitches

It ignores all the thousands of previous objections made by local people

There is no proven demand for travelling show people plots in this location

There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.

The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.

This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

Garlick's Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

We object to the proposal to remove Garlick's Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the

Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in Send, Ripley and Clandon will result in the character of these villages being lost and the countryside encroached.

We object to the development at Garlick's Arch because of flood risk. The site at Garlick's Arch is identified on the Environment Agency's flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council's SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

We object to the loss of rural employment on the site. The development at Garlick's Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

We object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick's Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

We object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

We object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick's Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents' in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick's Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

We object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35),

Garlick's Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

We object to poor air quality (Policy I3). Paragraph 4.6.27 of the Plan states that "Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health." The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

We object to the inclusion of the land at Garlick's Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick's Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

POLICY A58 BURNT COMMON

We object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site

This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.

The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

There is in fact no justification for building anymore industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented .“

There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to

acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

The impact on small surrounding roads will create traffic gridlock.

It will join up existing villages and defeat the purpose of the Green Belt.

The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

We object to the potential impact of para 4.4.23a on Burnt Common with its over allocation of industrial zoning is subterfuge for a waste management facility which is a dishonest and underhand approach to planning and proper consultation.