

**Local Plan Consultation
Guildford Borough Council
Millmead
Guildford
GU2 4BB**

**Response on behalf of
Guildford Greenbelt Group**

1 SUMMARY

We request that the objections made below are put to the Inspector appointed by the Secretary of State to review the GBC Regulation 19 draft local plan. A spokesperson (not a councillor) will be pleased to speak in respect of this issues.

We request that once all objections are fully taken into consideration the draft plan is amended accordingly and re-issued.

Guildford is a constrained borough by the reality of having 89% of its area zoned as permanent Green Belt and an out of date road network that is already at capacity. We are concerned that GBC have adopted an inflated OAN of 13,860 homes as a housing target **without any application of constraints** as required under the National Planning Policy Framework and the National Planning Policy Guidance.

The application of constraints to housing need is a sensible and practical approach to development within the borough and is not only what GBC have done in the past in previous plans but is also what its neighbouring local planning authorities have done.

The scale of the housing number proposed in this plan, inevitably increases the onus for the plan to be seen to be sound. A substantially lower number of 5,000 homes over the plan period, 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.

We are concerned that GBC have 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In our opinion much of the proposed local plan appears out of date.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.

2 EVIDENCE BASE

We object to the paucity of the evidence base. The submission documents are unsound, unreliable and inconsistent

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

The current SHMA inflates the proposed housing figure due to the following factors:

- the failure to correct for errors in the historical data for international migration flows,
- the way it considers students and affordability, and
- the flaws in the method for estimating the number of homes needed to support job growth
- the treatment of vacant property

The Green Belt and Countryside Study does not value the fundamental aim of Metropolitan Green Belt properly or look strategically at options for development in major settlements beyond. The way Green Belt is parcelled up and scored is not valid: serving 2 Green Belt functions is as valid as serving 4 functions. Green Belt is Green Belt, it does not require assessment or qualification. The Green Belt sensitivity analysis is not a valid basis for informing decisions.

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 Transport Evidence has been produced very late and is incomplete, inaccurate and untested to the extent that the Plan is not ready for a Regulation 19 consultation.

It is emerging that the Strategic Highway Assessment shows there will be congestion, even with all the highway schemes in the Plan. Many questions remain unanswered. E.g. Why would 1000 homes on Slyfield generate no extra traffic? The report only gives average speeds and information needed to understand how much congestion will occur and where it has not been provided in time to inform Plan proposals or responses.

The available evidence suggests much of the proposed Sustainable Movement Corridor cannot be delivered due to narrow roads and pinch points.

Evidence on bus travel is fundamentally compromised because no clear and workable location for a bus interchange is proposed.

No information has been provided on the demand for and capacity of rail services. The main line to London is already extremely busy in peak periods.

Information about the town centre as regards traffic, buses and parking is lacking. It is not credible to proceed without this given existing levels of congestion, the number of transport routes that rely on the town centre to cross the Downs, the shortage of crossing points over the railway and river and the fact that narrow roads and steep slopes make Guildford unsuitable for a ring road approach.

The Strategic Highway Assessment 2016 is flawed. It is invalid to base this on less traffic growth than the proposed housing growth. The report points to overcapacity use of the A3, M25, A31, A320, Millbrook, Ladymead, Woodbridge Road, York Road, London Road but understates the congestion consequences. Various suggested queue reductions are unexplained. The consequences of major proposed reductions in road space in the town centre (eg closure of Walnut Tree Close, narrowing of Woodbridge Road, reduced capacity of the gyratory) and of developing Burnt Common are not included. More time is needed to assess and refine this crucial 11th hour report which seems incomplete, understates the consequences of traffic overload, shows

inconsistencies, and does not supply assumptions or information needed to understand queues at junctions.

The Guildford Retail Study Update 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.

We believe that it was unacceptable to stop monitoring air quality, where NO₂ emissions exceed limits, on the unrealistic assumption congestion would reduce. Estimates of premature deaths have doubled and issues with vehicle emission controls have emerged. Traffic noise from the A3 should also be reported.

3 LEGAL COMPLIANCE

Key parts of the evidence are missing, flawed or based on withheld assumptions. We consider therefore that it is questionable as to whether the Local Plan meets all legal requirements.

The Strategic Housing Market Assessment overstates need, the Green Belt and Countryside Study uses a flawed approach and the Transport evidence is too late and incomplete to be relied upon to inform the Plan.

The Plan preparation process has had inadequate regard for national policy which attaches “great importance” to the “openness” and “permanence” of Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level.

The Sustainability Appraisal seems to have lost sight of the concept of Sustainable Development as described in the National Planning Policy Framework to the extent that we question whether it complies with the requirement.

It is unacceptable to treat Green Belt as a readily available source of development land during Plan preparation. The Mayor of London intends to respect Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level. Releasing Green Belt to fund infrastructure or build on open, previously-developed Green Belt does not pass this test. Opportunities to channel development towards brownfield locations beyond the outer Green Belt boundary, linked to sustainable transport, have not been adequately considered. It is not credible to suggest the Green Belt is being treated as permanent when its boundary was changed as recently as 2003 as part of the last Local Plan review. Indeed, land released in 2003 is neither fully developed nor efficiently used. An approach of eroding the Green Belt at each Local Plan review is not sustainable. If there is a case for Green Belt development, it needs to be proven through the application of policy.

4 WHY THE PLAN IS UNSOUND

We consider that the Local Plan is 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. We consider this makes the plan undeliverable and unsound.** We believe it would be harmful to the character, quality of life and economy of Guildford to apply the housing figure to a number of 13,860 new homes by 2033. We 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 **500 homes per annum. After application of constraints the target should be in the range of 250 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.

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.”

The specific policies described include several of particular relevance to Guildford including sites protected under the Birds and Habitats Directive, 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, we would question whether it is appropriate for the Appraisal to propose meeting needs in full from a sustainability perspective.

Notwithstanding guidance 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.

GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation.

GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.

GBC has proposed an OAN of 693 houses per annum in the GL Hearn Strategic Housing Market Assessment (SHMA) which we consider is unsupported.

Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018. This is too late.

5 DEFINITIONS AND SOURCES

To review a local plan from a standing start is a big task and has required a lot of reading and detailed research. Along the way we have come across well informed opinion from individuals and organisations

NMSS is a consultancy company specialising in housing demographics whose principal is Neil McDonald

Green Balance is a consultancy company specialising in housing demographics whose principal is Richard Bate

On matters of road infrastructure, we have relied on comments by Richard Jarvis of the GRA who was previously a highways consultant with WS Atkins

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 prepared by Guildford Borough Council.

GBC refers to Guildford Borough Council

SHMA refers to the Strategic Housing Market Assessment 2015 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 Preservation of Rural England

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

SSAG refers to the Save Send Action Group which comprises over 500 residents

ELNA refers to the Employment Land Needs Assessment 2015

NPPF refers to the National Planning Policy Framework

NPPG refers to the National Planning Policy Guidance

VoA refers to the Valuation Office Agency

6 VISION AND AMBITION

We consider that the vision underlying this Local Plan is inadequate and that the ambitions proposed are inappropriate.

The vision is to build 693 dwellings a year, an inflated housing target, produced by using a “black box” model that takes no account of anomalies in the ONS statistics for the borough that underpin this model. One such anomaly is the increase in the number of university students during the base years used to generate ONS population projections. Consultants used by GBC ignored this, so the housing target is far in excess of the needs of residents. This housing target will result in the borough’s permanent resident population increasing at 4.5 times the rate of population increase during the period 2001 to 2011, as measured by the censuses in these years. Given the existing strain on infrastructure in the borough the “vision” in this plan will create a nightmare for existing residents.

The only ambition in this plan is to build on a scale across the borough never before seen, driven by the ambition to “roll back the green belt”. There is no regeneration programme for urban areas of Guildford, and instead of using the Local Plan as an opportunity for redevelopment within Guildford’s deprived areas, the focus is on large developments outside Guildford, mostly in green belt. The plan has nothing for low paid workers in Guildford, and very little for young people who wish to live in the town. It is a plan to benefit developers, not residents; a plan rooted in the past, but without learning lessons from the past.

There are many contradictions within this Local Plan, and a few of examples of these are given below:

- The plan proposes a major increase in traditional “bricks and mortar” retail in the town centre, as well as an expansion in warehousing and distribution. Workers in these sectors tend to be among the lowest paid, at or just above the minimum wage. The plan places an emphasis on the provision of “affordable” housing, but those on the minimum wage cannot afford “affordable” housing, it is a misnomer. Workers in these sectors need social housing, but there are no plans for a significant expansion in Guildford’s social housing.
- As well as an increase in town centre retail, etc it is proposed to locate new employment sites in or close to the urban area of Guildford. Only 20% of the housing proposed is to be within the town, with the remainder outside Guildford town. This means that if employers take up the buildings in the centre of the town (this is a big *if*, as in surveys many employers complain about congestion) workers in these employment centres will have to live outside the town. Inevitably this means they will rely on cars and vans to get to their place of work. This is not sustainable, Guildford already has a problem with congestion and air pollution.
- The rate of growth (averaging more than 693 dwellings a year to 2031) means if employment is to be provided locally (for about 1,200 new adult residents a year) Guildford’s economy would have to expand at a rate well above anything seen in the recent past, and be sustained at this rate for 16 years – a period when history indicates there will be at least two national/international economic downturns. This sustained growth would be unprecedented. Without an expansion in local

employment, Guildford will become a dormitory town for workers commuting long distances to other areas. This is not sustainable.

- The delivery of housing is entirely in the hands of private companies that currently enjoy record profits due to their control of the delivery of new homes. These companies will simply not build if anything has a major impact on their profitability, be it a global economic downturn or a local oversupply of housing, whatever. Similarly, much of the infrastructure required has to be built by private companies, over which GBC have no powers. In effect, GBC are proposing a Local Plan over which they have minimal control. They have no powers to force the delivery of their targets in that plan. This means the plan is an exercise in fantasy, but a fantasy that blights the lives of thousands of people, especially those who live close to proposed development areas.

These examples serve to illustrate inconsistencies within the plan. Other specific points addressing the declared "Vision and Ambition" are detailed below.

Spatial Vision

A plan that will increase car journeys as much as this one will, especially in an area that already suffers from heavy congestion with associated high levels of air pollution, could not be described as a "vision". It is more of a nightmare than a vision. The Metropolitan Green Belt was established to prevent the urban sprawl that has blighted many countries, such as the USA, but the goal of this plan is to set aside the protection offered by the Green Belt, and to create urban sprawl, with large extensions to the urban area of Guildford and the creation of urban areas in the countryside.

A contributor to the nightmare vision is the ongoing lack of investment in infrastructure, which will be exacerbated by this plan. In terms of infrastructure, the Surrey County Council Infrastructure Plan estimated that the borough would need investment totalling £2.5 billion, based on the provision of about 9,300 dwellings through the period of the plan. GBC plan for at least 13,860 dwellings, most of them outside the urban areas of Guildford and so infrastructure needs will be higher than estimated. Of the £2.5 billion, SCC estimated that £2 billion would be available from various sources, leaving a shortfall of £0.5 billion. In an address to a council meeting, Mike Murray, speaking on behalf of Wisley Property Investments estimated that the developments outlined in the Local Plan would raise £100 million for infrastructure investment. This leaves an obvious shortfall of £400 million – but in fact the shortfall will be much greater than this, due to the housing target in the Local Plan being about 50% higher than in the Surrey County Council estimate, and because of probable changes to the Community Infrastructure Levy. This means that the borough cannot possibly meet its infrastructure needs, which is not recognised in the infrastructure plan that forms part of the evidence base of this Local Plan.

Another contributor to the nightmare vision is the lack of recognition of the air quality problem in some areas of the borough. That there is an air quality issue is illustrated by nitrogen dioxide (NO_2) concentrations that are higher than the legal maximum. One of the proposed development sites is close to one of the "official" NO_2 measuring stations, at Wisley, and this reveals that nitrogen dioxide concentrations have been higher than the legal maximum of an annual average of $40\mu\text{g}/\text{m}^3$ for several years. Other measurements have been made in villages that have roads that serve the A3 and have high traffic levels, and these have shown concentrations well in excess of

the legal maximum concentrations, to the extent that one village has formally requested that their village be designated as an air quality management area. This has not been put into effect, and the whole issue of air quality has been entirely ignored in the Local Plan, specifically in the spatial vision. The spatial “vision” proposed in this plan is the reverse of that recommended by the Institute for Air Quality Management, who said “*The pattern of land use determines the need for travel, which is in turn a major influence on transport related emissions. Decisions made on the allocation of land use will dictate future emissions, as many people and businesses will make significant use of road transport for journeys between places that form part of their daily lives.*”¹

This has not been recognised in the spatial planning within this plan, which proposes that a large majority of new dwellings should be in rural areas, some considerable distance from the urban centre and employment centres. It is a plan that could have been written specifically to increase journeys by road.

This report¹ also suggested that

“Ideally, air quality should be a prime consideration for long term planning, so that land is used and allocated in ways that minimise emissions and that reduce the exposure of people to air pollution, so that land is used and allocated in ways that minimise emissions and that reduce the exposure of people to air pollution.”

This has not been part of spatial planning, but it should have been, even though there is no statutory requirement to do so. However, there **is** a statutory requirement to declare an air quality management area (AQMA) in areas that are known to have high pollution levels, but this has not been done. The spatial planning in this draft plan will expose more people to air pollution. Instead of what is proposed, more housing developments should be within Guildford town, which could be achieved by recognising that an expansion in retail and warehousing and distribution is not sustainable, and the land set aside in the town centre for these used instead to provide housing. GBC should also have used the local plan to set targets for air quality planning, with proposals to reduce noxious emissions, for example, through the use of LPG fuelled public service vehicles, as is happening in other areas, such as Birmingham. This has not been done; there is no proposal to tackle existing air pollution or to alleviate the pollution caused by adding approximately 30,000 cars and vans to those already in use within the borough. This is the approximate number of vehicles that the proposed housing additions would bring.

There are many areas where the text within the “spatial vision” section does not accord with reality, and a few examples are given below:

- The opening text of the Spatial Vision reads

“The Local Plan: strategy and sites makes provision to meet the identified growth needs of the borough in terms of housing, employment and retail and leisure. This is achieved by maintaining the extent and function of the Green Belt in such a way as to protect the existing character of the borough through maintaining the clear distinction between urban and rural areas and safeguarding the natural built and historic environment”.

If this were what is planned, there would be little room for complaint. In fact, the clear distinction between urban and rural areas will be very considerably blurred with large holes punched into the Green Belt. More than 6% of the Green Belt will lose that designation.

¹ Land_Use Planning & Development Control: Planning for Air Quality, April 2015.

The plan calls for a very large, high density development at Wisley, close to the boundary of the borough, in what is currently open countryside in the Green Belt. Another large development is planned at Garlick's Arch, less than 3km south on the A3, and within another 3 km another at Gosden Hill Farm, all of which are in the Green Belt. When considering the view from the A3 the current appearance of open countryside from the junction with the M25 to Guildford along the A3 will be lost, replaced by two large developments in open countryside and a large extension to the urban area of Guildford, extending into the countryside. Thus the extent of the Green Belt will not be protected.

- Two of the villages to be removed from the Green Belt are East Horsley and West Horsley, with a total of 363 ha (3.6 km²) to be removed from the Green Belt. The justification for insetting of villages is given in Policy D4, and this is to increase housing density within villages. From some of the plans given in the Local Plan showing proposed sites it is clear that it is expected that the provision of a number of development sites and the insetting of these villages is designed to lead to the coalescence of villages, such as East and West Horsley, and Normandy and Flexford. As the housing layout and style in these villages is an open pattern of development, they both make a contribution to the openness of the Green Belt, and this will be lost because the housing density for the developments proposed (averaging approximately 18 dwellings/ha) is considerably higher than the average density in these settlements.

It is not clear why new Green Belt will be created in and around Ash and Tongham to prevent Ash and Tongham merging with the village of Ash Green, when the result of removing East and West Horsley from the Green Belt together with several new development sites will be their coalescence. If it was important to prevent existing villages from merging then both East and West Horsley would remain in the Green Belt, and proposed developments would be smaller, in proportion to the existing villages.

- Similar considerations apply to the settlements of Flexford and Normandy. The area to be inset is approximately 134 ha (1.3 km²) including a very large 67 ha development site, located between the two settlements. This will result in the coalescence of the settlements of Normandy and Flexford. As both make an important contribution to the openness of the Green Belt, they should not be inset, and this development site is inappropriate development in the Green Belt. Again, if it is important to prevent existing settlements of Ash and Tongham merging with Ash Green, then similar considerations should apply to these settlements, especially given that they are in the Green Belt, whereas Ash and Tongham are not.

The Spatial Vision goes on to say

"The plan provides for the delivery of 13,860 homes by 2033. The preferred location for this development is existing brownfield sites. Over 2,800 units are proposed in the urban areas to take advantage of the existing infrastructure and services, reduce the need to travel and offer alternatives modes of transport to the private car."

Or, to put it another way: *11,060 homes are proposed on sites which cannot take advantage of the existing infrastructure and services, which will increase the need to travel and which cannot offer alternatives modes of transport to the private car.* The low proportion of housing within the urban centre is because there is so much emphasis on providing employment sites within the urban area, for example, by expanding retail premises, etc but not enough on using these sites for housing – to take advantage of the benefits defined in the above quotation. There is no emphasis on using land in the urban area efficiently, for example, by replacing existing land hungry surface car parks with multiple level car parks, thus freeing up land for housing development. A few employment centres have multi-level car parks and this should be encouraged in other centres, and all new employment centres should be required to have multi- level car parks, ideally with several levels underground. Steps such as this would increase the availability of brownfield land within the urban area, and permit higher levels of housing provision. Another step would be to encourage the University of Surrey to do the same, to be more efficient in their land use, and to house a much higher proportion of students within the university campus – as they previously agreed to do. There is adequate space for this within the existing campus, especially if surface car parks were replaced by multi-level car parks. This would free up many houses within Guildford which would then be available to residents, either to rent or purchase.

The Spatial Vision refers to the need to the economy and steps planned to support local employers. However, one of the major issues that employers have with Guildford is severe traffic congestion, and this is not addressed adequately in the plan, and the Spatial Policy outlined will make it much worse. As stated above, a very considerable shortfall in funds required for infrastructure has been highlighted by Surrey County Council. Proposals for many of the changes to local roads are light on detail, and the funds suggested as being required (which in fact are unlikely to be available) fall well short of what is actually necessary to effect an improvement in congestion.

The Local Plan includes the provision of additional sites and premises to meet employment needs across the borough, as well as 120 houses per year for new workers for new employers in the borough. However, the rosy picture painted in the employment report by the authors AECOM does not adequately reflect the actual condition of the local economy. The strength of the local economy as painted in the Employment Land Assessment Report² was exaggerated through the careful selection of supporting statistics. As an example, in the section with the heading Policy and Socio-Economics (page 1) the increase in employment within the borough was given as 4.1% during the period 2010 - 2013. This was a period when Guildford was still emerging from a recession, and so employment growth was strong, but not typical of a full business cycle. Employment growth over a longer period should have been given, to give a more accurate picture of the local economy. Using NOMIS statistics the number of residents employed in 2005 averaged 68,000 and this had increased to an average of 68,500 in 2015, so that the growth in employment over this 10 year period was less than 1%. Note too that the average employment in 2015 was considerably lower than peak employment reached in 2007, when it was 74,400. According to NOMIS statistics there has been very considerable variations in the number of residents employed and this is not captured by the Employment Land Assessment report. Although the NOMIS statistics refer to employment by residents of the borough rather than jobs within the borough (a similar time series for these is not readily available), jobs available locally should be reflected in the employment of residents. In fact, NOMIS statistics also reveal that the average

² Guildford Borough Employment Land Assessment Report, AECOM, September 2015

weekly pay of residents in the borough is significantly higher (6% in 2015) than pay for those employed within the borough, suggesting the local economy is weaker than neighbouring economies. Residents commute outside the borough to get higher pay. It is simply astonishing that the Local Plan suggests that jobs can be created over a 15 year period at a rate well in excess of anything that Guildford has seen in the past. It is simply a nonsense to add an additional 120 houses so that additional workers will come to the borough. The housing target of a minimum of 693 per year will result in an additional adult population of about 1,200 potential employees per year, and the local economy will not be able to supply employment for these people. Historical employment data provides no evidence that over a 15 year period an additional 18,000 jobs will be created within the borough, given that the number of residents in employment increased by only 0.7% in the 10 years from 2005 to 2015. Consequently, a large majority of new residents will be forced to commute out of the borough to find employment, adding enormously to traffic congestion and air pollution.

There are many other instances of selective use of statistics in the Employment Land Assessment Report, far too many to elaborate on. As the report concludes there is a need for additional land for employment premises, and because a large part of this land set aside for employment is within Guildford town, it is worth commenting on a few more instances of the use of statistics. This is because this land should be used for housing within the town, which is where the need for housing is, not in the countryside beyond the town. In Section 6.6 of this report², an explanation of employment forecasts were given. Data was used by AECOM from 3 separate forecasting organisations for employment growth between 2015 to 2033, namely

- Cambridge Econometrics
- Experian
- Oxford Economics

These forecasts exhibited a very wide range – in the case of office employment the range was 0.55% to 1.18% per annum, so the highest forecast was 2.1 times the lowest. This may be acceptable in a short range forecast, but is wholly unacceptable for long range use. Similarly, the forecast for employment in the industrial/storage category ranged from 0.58% to 1.14%, so in this case the highest forecast was 2.0 times the lowest. Again, this range should be unacceptable for use in long range forecasts. These individual forecasts were averaged by AECOM to provide a number used to project the requirement for floor space for these respective employment categories. In this case, with forecasts from various sources exhibiting such a wide range, averaging is not appropriate. As an example of the dangers of averaging consider a human with half of their body in a deep freeze, at about -25°C, and the other half in an oven at 100°C. Their average temperature would be 37.5°C – an ideal body temperature, but that would be irrelevant because they would be dead. Averaging must take account of the range, etc and this has not been done. In fact, the variation given in these separate forecasts indicate that the quality of the forecasts is very debateable, given that they are all for the same variable, and over an extended period of time each forecast would result in a very different outcome.

In addition, the emphasis on these two employment categories is unwise as the total employment market is important – it is likely employment in some employment categories will fall, so if there is growth in any employment category it must serve to mop up unemployment as well as create new opportunities. Finally, statistics given for actual changes within Guildford cover the period 2004 to 2012 – but this should be unacceptable for a report published in September 2015, data up to 2014 must have been available at the time of publication.

A final example of the selective use of statistics is from section 6.11.2, in which the OPDM Employment Land Reviews Guidance Note is quoted. This was used to provide a ratio of land to premises on that land, over one storey, so that the area required for industrial land could be calculated. Quoted ratios ranged from 1:0.35 to 1:0.45 (ratio of land : premises) for manufacturing and from 1:0.40 to 1:0.60 for warehouse uses. AECOM used the average of the median of these to provide a ratio used in producing forecasts for land requirements, namely 1:0.45. However, using an average of the medians was inappropriate in Guildford – land costs are high in the borough, and a large part of the borough (89%) is designated green belt and so using this average ratio betrayed a lack of ambition to use land efficiently. An ambitious goal would be to do better than the best, and this would be provided by using an average ratio slightly beyond the range given, for example, 1:0.60. This could be achieved, for example, by ensuring that all car parking was provided by underground parking, beneath buildings, so that open space could be retained, and by building several storeys above ground where this is possible. Surface car parking and single storey buildings are inefficient in their land use. Using an average land to premises ratio, as AECOM did, showed a total lack of ambition to use land efficiently. Using land efficiently would mean there would be no requirement for additional land to be set aside for employment purposes – and this land could be used instead for housing.

Overall, the Employment Land Assessment displayed a selective use of statistics to give an inaccurate overoptimistic picture of the growth potential in local economy as well as displaying a complete lack of ambition to use land efficiently. Consequently, its conclusions regarding land requirements for employment use should be disregarded. In the paragraphs devoted to transport, there is a statement

"During the plan period Guildford will experience significant improvements to transport infrastructure including new stations at Guildford West (Park Barn) and Guildford East (Merrow).

This is presented as a factual statement. However, Network Rail has made no commitment to approval of these stations, despite having recently published a study that examines investment needs on this route up to 2043³. In this study, the possibility of these new stations is mentioned, but only as a response to the consultation that preceded the publication of the report. Details given of proposed projects that will be included in their next spending plans (to cover the period 2019 to 2024) include no provision of any description for these new stations, and in fact the emphasis is on increasing the number of trains per hour during peak periods. Adding a further two stops would reduce the ability to add additional trains, and so goes against the need to increase capacity on the line by adding trains. Thus it seems highly unlikely that these new stations would be provided within the time frame of this Local Plan, if ever. In addition, it is clear from the Network Rail report that changes to platforms in Guildford Station will not be made in the next budget period (up to 2024) and that the inclusion of this project in the next budget period (after 2024) is dependent on further studies. Similar timing constraints apply to the electrification of the North Downs Railway. So the delivery of many of the infrastructure improvements, particularly the new stations, within the timeframe of the Local Plan is, at best, doubtful. To present their provision as a certainty was simply dishonest. Finally, according to the Spatial Vision, the delivery of housing as described in the plan is predicated on the delivery of infrastructure, yet there is no monitoring system in place to ensure that infrastructure is delivered, with necessary services provided. As an example, consider the need for GP services. It is possible to build a doctor's surgery, but there is a

³ Wessex Route Study, Long Term Planning Process, Network Rail, August 2015

national shortage of GPs, so there are considerable problems in recruiting doctors needed to man existing surgeries. Thus building premises are no guarantee that services will follow, even assuming funds are available. No monitoring systems or programmes are described in this spatial vision and so one has to assume there are none in place to monitor this programme to ensure that services, as part of necessary infrastructure, are actually delivered. No red lines for specific developments have been provided, so that it is clear exactly what infrastructure must be provided before a specific development can be started. As no monitoring systems are in place, there is nothing in this vision to suggest that the promise made by Councillors, that infrastructure will be delivered before additional housing is built, will be honoured

7 POLICY S1 SUSTAINABLE DEVELOPMENT

We object to policy S1 as stated and the presumption in favour of sustainable development

While this wording is based on the National Planning Policy Framework (NPPF) – which is binding - this policy fails to recognise that development in rural areas, with inadequate transport and other infrastructure, cannot cope with the proposed scale of development. It is unsustainable. This should represent an absolute constraint on development.

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Policy S1 ought to set a clear framework. No definition of “sustainable development” is given.

The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The promise “to secure development that secures the economic, social and environmental conditions in the area” omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. Under this policy, any development will qualify as “sustainable”, thereby failing to apply the NPPF’s most important guideline.

The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies.

The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy suggests that “We will work proactively with applicants jointly to find solutions that mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area”. This does not appear to accord with the requirements of NPPF 10 which notes that “plans and decisions need to take local circumstances into account so that they respond to the different opportunities for achieving sustainable development in different areas”.

Furthermore NPPF 14 notes that specific policies within the framework may require development to be restricted, and in this context, decision taking should not imply that development proposals

should be approved in all circumstances.

NPPF 17 notes further that there are 12 planning principles which should be applied to underpin both plan-making and decision-taking and so these should be taken into account in the framing and the administering of the Local Plan. These include

- "empowering local people to shape their surroundings"
- "take account of the different roles and character of different areas, promoting the vitality of our urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving communities within it"
[note in this context that Guildford is in the Metropolitan Green Belt surrounding London and, therefore, that all users of the Green Belt within London are stake holders for the purposes of this assessment]
- "support the transition to a low carbon future" [hardly promoted by increasing commuter dwellings]
- "contribute to conserving and enhancing the natural environment and reducing pollution"
- "encourage the effective use of land by reusing land that has been previously developed (brownfield land) provided it is not of high environmental value"
- "conserve heritage assets in a manner appropriate to their significance"
- "actively manage patterns of growth to make the fullest possible use of public transport walking and cycling and focus significant development on locations which can be made sustainable"

Of the 12 core principles set out in NPPF 17, Policy S1 seems to be disregarding at least 7 of these. These core principles must be taken into account in order to meet the requirement to comply with NPPF 17.

There is grave concern about the statement in the policy that "Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in adopted neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise." This is too flexible and too permissive and open to subsequent abuse. Policies should be structured as part of local plan so that they will be enforceable for the duration of the plan. Furthermore, the presumption in favour of all applications, as stated in this policy, fails to recognise the requirement for constraints which should be agreed and implemented as part of the Local Plan process. The proximity of the SPA, for example, should preclude development (which is a major factor for a large proportion of the borough); most development in the AONB should be severely restricted (which is another major factor); and Green Belt should act as a substantial constraint on development. The Birds and Habitats Directive is a further major issue.

Astonishingly, there are no Monitoring Indicators to ensure the achievement of this core requirement set out in paragraph 14 of the NPPF.

In the context of assessing sustainability it is worth quoting from the response of David Roberts who is a retired civil servant who was, from 2005-08, in charge of the British Government's international policy on Sustainable Development (SD).

"The NPPF states that the presumption in favour of sustainable development "should be seen as a golden thread running through both plan-making and decision-taking[1]." Standing at the head of the draft plan, Policy S1 ought to set a clear framework. Instead, no definition of "sustainable development" is given[2]. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious longterm impacts.

The promise "to secure development that secures the economic, social and environmental conditions in the area" omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is useless. Under this policy, any development will qualify as "sustainable", in breach of the NPPF's most

important guideline.

The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan's contempt for Green Belt constraints is amply demonstrated in later policies. The commitment to approve planning applications "wherever possible" and "without delay" reveals this draft plan's pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

- This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17[3].

8 POLICY S2 PLANNING FOR THE BOROUGH

We object to policy S2 the Borough Wide Strategy and the commitment to build 13,860 homes based on the Strategic Housing Market Assessment (SHMA) 2015 prepared by GL Hearn.

The OAN "objectively assessed need" figure in the SHMA of 693 homes a year is far too high

We are very surprised and concerned that GBC have adopted the OAN of 13,860 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%** from the 594 new homes identified in their own SHMA. "It should be noted that local evidence (Strategic Housing Market Assessment - SHMA) highlights a need for an additional 499 new affordable homes every year in the Borough and a total of 594 new homes every year when taking into account demand. **Given the level of environmental constraints present in the Borough, it is considered that the provision of an average of 292 dwellings per annum represents a reasonable level of housing growth for Woking and is deliverable.**"

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 2016 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 693 homes per annum to **510 homes per annum**.

The 41 page report by NMSS which can be found on the GRA website entitled “A Review of the West Surrey SHMA as it relates to the Objectively Assessed Housing Needs of Guildford”. 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.

NMSS found that the SHMA used in the Local Plan incorrectly adds extra homes to its basic demographic projection to allow for improving affordability of housing, increased student numbers and economic growth. The report found that none of these additions were justified based on the evidence presented within the SHMA. The report concluded amongst other matters that:

- The affordability of housing in Guildford is no worse than in other Surrey districts and boosting supply beyond the demographic OAN would not result in a noticeable improvement in affordability but simply in more people moving to the area.
- There are reasons for believing that the SHMA’s estimate of the number of homes needed for students may be too high and that an adequate provision for

students is already included in the demographic OAN. The report advises that the Council should commission a separate student housing need figure for Guildford given the distorting effect of students on our overall OAN. It envisages that, once this exercise is undertaken, improved accuracy means the overall OAN would be likely to reduce still further.

- The SHMA seeks to estimate the number of homes needed to support employment growth using employment rate assumptions that are inconsistent with the employment forecasts. This produces misleading results. An analysis of the Cambridge Econometrics and Oxford Economics forecasts using employment or economic activity rate assumptions consistent with the forecasts suggests that in neither case is there a need to provide more housing than suggested by the demographic analysis. Indeed, in both cases a smaller population growth (and hence fewer homes) could support the jobs growth that is forecast.

A further independent report was procured in 2016 by the Campaign for the Protection of Rural England CPRE from Richard Bate of Green Balance, an independent consultancy with expertise in demographic and housing matters to carry out a review of the GL Hearn SHMA

The report by Green Balance runs to 37 pages and its findings are that the OAN for homes in Guildford should be reduced from 693 per annum **to 481** because:

1. the vacancy rate figures should be taken from local government annual records rather than from the 2011 Census. This would reduce vacancy rates to 2.9% in Guildford.
2. there should be no increase for affordability above basic demographic change.
3. there should be no increase for Student housing and it was considered unrealistic that the University should be allowed to exert such substantial pressure on the domestic housing market.
4. the use of employment-led forecasts should be abandoned using purely household projections instead which are more reliable as a form of prediction.

Two completely independent expert reports are surprisingly consistent in their findings. In broad terms a figure of approximately **500 homes per annum** would appear to be a correct estimate of OAN for Guildford. However, **this is before constraints** are applied to arrive at an acceptable housing target. A further study is attached which is included within this section by reference.

It is unacceptable that demographic and economic model assumptions have been withheld by GBC and cannot be checked making the process unaccountable.

The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations

underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA.

Both the National Planning Policy Framework and National Planning Policy Guidance provide a clear policy direction that the overall housing target should be reduced by a variety of constraints to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors. We have corrected this omission below. Infrastructure policies should be planned at the same time as Local Plans but in this case they have effectively been left out and are not sufficiently developed.

The Framework also makes clear that, once established, Green Belt boundaries should only be altered in **exceptional circumstances**, through the preparation or review of the Local Plan.

Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.

Appendix: Report prepared by David Reeve in relation to the SHMA (attached as this is a separate document but included within this section by reference).

9 THE NEED TO APPLY CONSTRAINTS

Ministerial guidance in relation to building on the Green Belt is clear:

1. “the single issue of unmet need - is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt” - Nick Boles to Sir Paul Beresford MP 7th February 2014.

2. “we were always very clear that we would maintain key protections for the countryside, and, in particular, for the Green Belt. The Framework makes it clear that a Green Belt boundary may be altered only in exceptional circumstances and reiterates the importance and permanence of the Green Belt” – Nick Boles to Sir Michael Pitt, Planning Inspectorate 3rd March 2014.
3. “Planning Guidance, updated in March 2014, also states that unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt” – Nick Boles to Sir Paul Beresford MP 18th June 2014

70% of the sites put forward in the Local Plan are 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 693 per annum to 500.

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 250 homes per annum which over a 20-year period would be 5,000 homes**. All of these homes could be built in the existing urban brownfield areas of the borough and would in part satisfy the 20,000 objections made by residents to the 2014 draft plan and also relieve the additional problems of inadequate infrastructure.

It would also mean that there is currently 8.5 years supply of housing (2131/250) which is made up of existing permissions granted (1,518) and completions made (613) during 2013/2015. (Monitoring Report by GBC 2015)

Whilst we have many significant objections to the GBC Local Plan we applaud the policy statement by GBC in their Monitoring Report, “We will continue to monitor the use of previously developed land, and continue to identify as many opportunities as possible for redevelopment of previously developed land.” We believe it will be to the benefit of all residents if GBC can apply themselves vigorously to this endeavour in order to protect the Green Belt.

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10 POLICY H1 HOMES FOR ALL

We object to policy H1 Homes for all.

Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set any rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

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 5-6 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.

Student accommodation should provide for 100% of new students and more than 60% of existing students, which 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.

Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.

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11 POLICY H2 AFFORDABLE HOMES

We object to policy H2 Affordable homes.

Objection to Regulation 19 GBC Local Plan
GGG
15 July 2016

“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 (4.2.40) 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.

We question the assumptions that seem to underlie this policy: that people have a right (rather than a legitimate aspiration) to own a home; that they should be encouraged to live locally (contradicting the Government’s policy of encouraging labour mobility and development in poorer regions, where homes are cheaper anyway); that increasing local house-building will reduce overcrowding and congestion (rather than simply suck more people into the borough); and that it will stem the rise in house prices (even though 13,860 new homes would be a drop in the ocean, given that prices are determined by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and the currently low cost of capital for overseas and other buyers). The weak mechanisms proposed might influence the market in more remote parts of the UK, but not here.

This policy allows “affordability” to be a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

In the draft Local Plan affordable homes is a misnomer, a designation that could have come straight from George Orwell’s Ministry of Truth. It refers to houses that are expected to go onto the market at 20% below the “market” price, or available at a rent of 80% of the prevailing “market” rate. Some of these are built to lower specifications than neighbouring houses, so that they remain profitable for builders. But when house prices and rents are high, so-called affordable homes are not affordable to those with low paid jobs or on benefits. “Affordable” homes are not the same as social housing, or old style council housing, and are not a replacement for any social housing that is sold off. Across the borough, according to the most recent data from the ONS, in Feb 2016, there were 5,696 housing benefit claimants. These “affordable” homes will be of no use to these people, or others on benefits, or on low wages. There is nothing in this policy for these people, many of whom need social housing, which has historically truly been affordable.

The Policy Statement (blue text in the Strategy and Sites document) refers to working “to increase the number of affordable homes in the borough and meeting identified needs.” But there is nothing in this plan that will meet the needs of those on benefits, or on low wages.

The Policy goes on to say that on sites “providing five or more homes, or sites of 0.17 ha regardless of the number of homes, at least 40% of the homes must be affordable homes....” A site of 0.17 ha is only 0.4 acre, and many single homes are built on plots of this size. This is a very low threshold.

No exemptions are given – for example, what about self-build housing, or shared ownership, etc? This policy does nothing to encourage various paths to property ownership, other than the affordable housing route – which for many people is simply not an option. It is poorly thought out and is based on data which is not accurate, including the West Surrey SHMA, which in any case should be revised because of the poor understanding of the borough’s population statistics that underpin the study and the Brexit vote.

In the wording of the text supporting this Policy there are many errors of fact, errors through omission

and exaggerations in the introductory text to this policy. As an affordable homes policy should be a cornerstone of the Local Plan, some of these are reviewed in depth below.

Paragraph 4.2.30

The final sentence of this paragraph reads: "High demand and limited supply have resulted in one of the least affordable areas of the country to live in".

This is a profound statement, but one that was made without any supporting analysis, so it appears to be based on supposition, not on fact. Relevant analysis would consist of looking at demand for housing through, for example, population growth; then at the supply of new homes and the balance between these – and then compare this with property price increases. Then a similar analysis should examine other areas too, to assess if Guildford Borough is different from other local authorities within the south east. Obviously, this type of detailed analysis is not possible in a submission on the draft Local Plan, but the fact that this statement was made in paragraph 4.2.30 without any supporting information is a major concern, as this unsupported statement in itself could be considered to be the driver for housing policies within this draft Local Plan.

There is no question that property prices are high within the borough, but this is largely a consequence of being close to London, with a reasonably fast train connection. A Local Plan is supposed to focus on local needs, not the needs of those who wish to move out from London. All of Surrey and the home counties have high prices and recent statistics show that the rate of price increases in the East has been higher than in the South East. High prices are not a phenomenon unique to Guildford. This is shown in Figure 1, which shows that price increases in Guildford are mirrored in Woking and Dorking, which are in neighbouring boroughs. In fact, this shows that over the last two years price increases in Dorking have been higher than in Guildford. This figure was generated on the Zoopla website¹.

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with Dorking
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Go

Value trends



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Figure 1. Comparison of Average House Price Increases

It is also incorrect to suggest that high prices are a consequence of an imbalance between supply and demand – there are many factors that have an impact on property prices; the supply and demand balance is only one of these. Although it is not appropriate to have a detailed critique of why housing costs are high, as one of the declared goals of the Local Plan is to increase affordability it is appropriate to comment on other factors that affect house prices, and this has been done in Annex 1. This also provides a borough wide analysis of the supply of housing between 2001 and 2011 and the demand for new housing, using census data.

This shows that the population of the borough increased by 7,482 persons, of whom 3,723 were full time students aged 18 and over. A few of these may have been Guildford residents but the vast majority would be new to the area. Some students find accommodation in student halls, and as this accommodation expanded during this time period, it has been assumed about 40% of the increase in student population would find accommodation in student halls, leaving 2,234 that would need accommodation in the town. With 4 students per house, this need would be equivalent to 559 houses.

Census data for 2011 revealed that the average household in the borough was 2.42 persons, so the increase in demand for housing caused by the increase in population (excluding students), assuming 2.42 persons/household, was 1,553 new houses.

Thus the total number of new dwellings required by Guildford's population increase between 2001 and 2011 was 2,112 (559 plus 1,553). In fact, the census reveals that the number of new dwellings was 2,692 – so supply actually exceeded demand by a considerable margin, about 28%. Yet over this period Land Registry data shows the average house price in Guildford borough almost doubled. As supply exceeded demand, other factors beyond the supply and demand balance affected house prices. This means that the underlying premise behind the Local Plan is incorrect; house prices have not increased because of a supply/demand imbalance. At the very least this means that the 31 houses added to the housing target to promote affordability should not be included, but in fact the whole of the SHMA and Local Plan should be revised, to include a more accurate picture of the housing market, which is currently poor.

However, there has been no detailed analysis by GBC of housing needs, this was contracted out to a consultant, and the housing model used by that consultant has not been subject to any scrutiny. The SHMA did not examine fundamental reasons for house price increases, nor did it properly examine the historic supply and demand balance across the area. Consequently, the SHMA is not fit for purpose, as no understanding of the fundamental workings of the housing market was shown in this study. Had a proper analysis been carried out it would have shown that in 2015/6 across the borough there were 2,510 housing transactions, and analysed the price bands of sales. Of these, 713 housing transactions were below £300,000, which is approximately what a couple on average earnings in the borough could borrow. A more detailed breakdown is given in Annex 1.

Paragraph 4.2.31

In paragraph 4.2.31, the text of the opening sentence reads "The West Surrey Strategic Market Assessment 2015 indicates that approximately half of the Guildford households over the plan period will not be able to afford to buy or rent a home that meets their needs on the open market without subsidy."

This sentence is plainly nonsense. The census data of 2011 showed that 66.6% of Guildford households either already owned or were in the process of buying their home. If the sentence refers to new households being formed in Guildford during the plan period, it should say so. If that were the case, it would not be surprising – the statistics on which the housing projections were based included a large increase in the number of full time students, a fact which was ultimately overlooked by GBC consultants, despite this being noted in several places in the SHMA. As shown in Annex 1, census data shows 50% of the increase in population from 2001 to 2011 were students – and very few of these would be seeking to buy in Guildford, but are unlikely to take up a place at the university unless they had adequate funding, including the means to pay their rent.

Paragraph 4.2.32

Paragraph 4.2.32 discusses affordability in more depth and provides the ratio used by GBC to assess affordability. There are many definitions of affordability in use by different organisations and frequently this is a ratio between pay and house prices. GBC have decided to use a ratio which is of very limited value – the ratio of the lowest 25% of earnings to the lowest 25% of house prices. The higher this ratio, the less affordable the housing. This is a remarkable ratio as at the peak of home ownership in the UK, home ownership was just over 70% of total households. This is not because the remaining 30% did not want to own a house, although some did, but because in many cases home ownership was not a suitable option. This would apply to students, to migrant workers who wish only to work in the UK for a short time; people who do not want the responsibilities that comes with home ownership; people with temporary employment contracts, armed forces personnel, etc, etc. But GBC

have chosen to consider affordability using the lowest paid – a group that have never been able to afford home ownership, or who may have no desire for home ownership. It is a bizarre ratio to use and is completely inappropriate to assess affordability in the borough.

It is more normal to consider the ratio between average pay and average property prices, though this is not an especially good ratio either, as average pay gives a certain weight to the lowest paid, who have never been able to afford home ownership. Average house prices are not a good measure either, as the sales of a few high cost properties will tend to push up average prices and distort the affordability ratio. It is much better to use the median property price in an affordability ratio.

Another more relevant ratio is to use the average pay of first time buyers and the median price of properties purchased.

The text in the paragraph goes on to use government figures) from 2013, quoting GBC's affordability ratio (bottom 25% of wages to bottom 25% of house prices) of 10.92 which was said to be "higher than Surrey's ratio of 10.89".

The difference between these two ratios was 0.03, or in percentage terms, 0.28%. In other words, given that affordability ratios are estimates, there is no significant difference between these numbers. So it was nonsense to infer that property in the borough was less affordable in 2013 than in the rest of Surrey.

The text also states that the most recent data for this affordability ratio is from 2013, but in fact up to date information is provided by way of an interactive map² which shows that Guildford Borough has a better affordability ratio than all but one of its neighbouring boroughs. In other words, housing is more affordable in Guildford than in most neighbouring boroughs. Data provided by the ONS was from Q3 2014 to Q3 2015, as full details for 2015 were not available. This map (and a supporting spreadsheet) provides 2 ratios, for median earnings to median house prices and GBC's preferred measure, lower quartile earnings to lower quartile house prices. These are given in Table 1, and on GBC's preferred lower quartile measure, Guildford is the most affordable of 6 of the 7 authorities listed, with only Rushmoor more affordable. On the more appropriate ratio of median pay to median property prices Guildford and Surrey Heath were essentially the same, with only Rushmoor again more affordable.

Table 1 Affordability Ratio Comparisons

Local Authority	Lower Quartile Ratio	Median Ratio
Elmbridge	14.19	15.17
Woking	13.95	13.31
Waverly	13.7	14.67
Mole Valley	12.63	12.98
Surrey Heath	11.61	11.87
Guildford Borough	10.89	11.94
Rushmoor	8.95	7.85

This data shows clearly that GBC were incorrect to say that up to date affordability data was not available and more importantly, that of the local authorities that share a boundary with Guildford Borough, housing in Guildford Borough is actually more affordable than in almost all neighbouring local authorities.

Another indication of Guildford's relative affordability was provided by an article in the Daily Telegraph³. This was about a couple who had been resident in London, but had moved to Guildford so that they could save for a deposit, but who were considering a move back to London. A

comparison was made of the costs of living in Guildford or London, including travel costs to work in London, which showed that annual costs in Guildford were lower by an estimated £3,052; about 16% cheaper living in Guildford than in London. This is why people are moving from London to Guildford – and is why if houses were built as per the Local Plan target, they would mostly be bought or rented by Londoners, not by residents of the borough.

Paragraph 4.2.23

This paragraph refers to sufficient housing to meet the needs of the borough's population – but the proposed minimum of 693 dwellings a year is well in excess of the needs of the borough's residents. The data used in the SHMA ignored the effect of full time students and so the housing number is very considerably in excess of the needs of the resident population. If this housing is delivered it will cause an increase in Guildford's population that is considerably more than recent population growth – almost 5 times the rate of population growth during the period between the censuses of 2001 and 2011.

The final part of the paragraph is nonsense ".....ensuring people with a wide variety of occupations in the borough and potentially reducing travel to work journeys."

Housing proposed in the Local Plan is mostly in the countryside, with about 70% of the housing proposed on land that is currently in the Green Belt. These locations are some considerable distance from employment centers, many of which are located in central Guildford – so journeys to work will increase, not reduce, and congestion will get much worse. This issue is considered in detail in Annex 2, which shows clearly that building new homes in the countryside will result in many more traffic movements than building homes within Guildford.

Annexe 1

Housing Supply and Demand Balance Analysis in Guildford Borough: 2001 to 2011

As census data is considered by the Office for National Statistics (ONS) to be their "gold standard" this analysis uses only census data. Although data for subsequent years is available, this is based on many estimates and so analysis is more subjective.

Across the borough, during the 10 year period between the two most recent censuses⁴, the number of dwellings in the borough increased by 2,692, an average of 269 dwellings per year. During the same period, the population of the borough increased by 7,482 persons, but a high percentage of these were full time students, aged 18 and over. Some of these students may have been local, but as this was probably a small number, it was ignored. This data is summarised in Table 2, below.

Table 2 Census Data for Guildford Borough

GBC	2001	2011	Change
Dwellings	53,388	56,080	2,692
Population	129,701	137,183	7,482
Students (18+)	7,004	10,727	3,723
Persons/household	2.32	2.42	0.10

Some of the increase in students would have found accommodation in students halls of residence (for example, the development in Manor Park opened in 2005) it is assumed that about 40% of the increase in student numbers were in student halls of residence, leaving 2,234 to find accommodation elsewhere. The majority of these would have found rooms in privately rented houses, categorised as "Homes of Multiple Occupation". Assuming 4 students per house, the increase in student numbers would have needed 559 extra houses. The remainder of the population increase, the "permanent" resident population of Guildford, increased by 3,759 people. As the average number of people per

household was 2.42 in 2011, a further 1,553 dwellings were needed for this increase in population. So to house the overall increase in population, including students, about 2,112 additional houses were needed – but 2,692 were built. Thus the number of houses needed in Guildford to house the population increase was actually substantially lower than the supply available; so the balance between supply and demand was not responsible for the increase in house prices over this period, when average property transaction prices across the borough almost doubled.

During the financial years 2001 to 2011, average property transaction prices across the borough are shown in Table 2. This includes average and median property prices for transactions in the years shown. In any given year there may be several high priced transactions which distort an average, and so the median price is also given – the median is the mid-range price, so that 50% of transactions were below this price with 50% above. It is a better indicator of the movement of prices than averages. Also shown is the number of transactions for each year.

Table 3 Land Registry Property Prices in Guildford Borough

Year	Average Price £	Median price £	Transactions
2001/2	218,637	172,000	3118
2002/3	254,406	199,995	3211
2003/4	275,070	220,000	3036
2004/5	294,235	240,000	2851
2005/6	303,612	246,250	2974
2006/7	336,925	250,000	3294
2007/8	381,221	289,950	2867
2008/9	354,322	250,000	1481
2009/10	354,198	270,000	2127
2010/11	414,167	303,000	1916
2015/16	486,158	391,750	2510

The data in Table 2 shows that prices increased very rapidly from 2001/2 to 2007/8, and that the number of transactions was quite constant, at about $3,050 \pm 200$. This represented a turnover of about 5.6% of all of the dwellings in the borough (53,388 in the 2001 census). Then in 2008/9, prices fell, and stayed low for two years. If the balance between supply and demand were the only factor influencing house prices this would suggest a huge increase in supply – but this did not occur. It can be seen from this that the balance between supply and demand must have had a minor impact on house prices. In fact, determining factors were the availability and cost of credit, and the demand for housing outside London. Credit was freely available and credit costs (in real terms) were low, consequently house prices increased rapidly from 2001/2 to 2007/8.

Data from Table 2 is shown in graphical form in Figure 1, and the impact of the recession of 2008/9 is clear. It interrupted the increase in property prices – but the reduction in interest rates that accompanied this recession, which provided very low credit costs, resulted in property prices increasing again in 2010/11. Credit costs continue to be very low and when combined with the huge expansion in credit from quantitative easing, the price of assets increased sharply. Again, this had little, if anything to do with the supply and demand balance for housing.

This picture of supply of housing exceeding demand across the borough is similar to the national picture. According to an article in the Guardian newspaper⁶, across the nation between the years of 1997 and 2007, "the housing stock grew by 10%, but the population only grew by 5%. If house

prices were a function of supply and demand, they should have fallen slightly over this period. They didn't. They rose by more than 300%."

So the issue of high prices is a national issue, not confined to Guildford Borough, and is not solely because of the supply and demand balance. Building more houses to increase affordability within the borough will not have the desired effect. This conclusion (based on data) is at variance with the Local Plan, and shows clearly that the evidence base underpinning the Local Plan is suspect, and that the analysis in much of this data base, especially the West Surrey SHMA, is inadequate.

The cursory analysis above also indicates the severe impact of having an additional 693 dwellings coming onto the housing market. At the beginning of the recession, in 2008/9, there were only 1,481 property transactions across the borough. Adding 693 dwellings to this would create many problems for any existing householders who wished to sell. As new build housing would be attractive to anyone moving from London, and is more expensive than equivalent "used" housing, the average price for housing would probably not fall – but householders would be forced to reduce their selling price in order to sell.

Given that the number of domestic property transactions in 2015/16 was 2,510, adding 693 houses to this mix would mean that redevelopment projects would not proceed. Existing run down areas of Guildford would become more run down – there would be no incentive to revitalise them under this proposed plan. Green field sites outside Guildford would provide the bulk of new dwellings – so large areas of Guildford would simply be left to decay. This is contrary to policies within the NPPF, specifically those policies that protect the Green Belt.

Figure 2 also shows that the median price is increasing more slowly than the average price, a clear illustration that the average price is not a good indicator of the housing market, due to the impact of a limited number of high value transactions.



Figure 2 Property Transaction Prices in Guildford Borough

A true picture of the housing market has not been presented in this Local Plan. A more accurate picture (for 2015/16) is given in Table 3, which shows, for example, that there were 183 housing transactions at a price equal to or lower than £200,000 during 2015/16.

Table 4 Housing Transactions in Guildford Borough, 2015/16

Number of Transactions	Average of these
14	≤£100,000
183	≤£200,000
713	≤£300,000
1312	≤£400,000

According to other ONS statistics, average earnings for Guildford residents in 2015 was £33,557 per year. A couple, with both on average earnings, using a multiple of 4.5 times earnings, could take out a mortgage for just over £300,000. According to the 2015/16 Land Registry data they would have had a choice during 2015/16 of at least 713 properties. This suggests that the affordability issue in Guildford has been exaggerated in order to promote a pro-development agenda.

Factors that Affect House Prices and Affordability

Across the UK, much of the planned increase in house building is related to the issues of high house prices and affordability – building more houses to increase the supply has been the approach adopted by the government, even though this policy is high risk, for example, consider the collapse of the housing markets in Spain, Ireland, etc in 2008/9 as a consequence of their massive house building programmes. There has been no risk analysis associated with the policy, either nationally or locally in the borough. House building appears to have been put in place as a strategy to drive economic growth, so that a great deal of effort (and government subsidy) has been devoted to this policy, to the detriment of other important policies, such as regional and industrial.

Affordability is not just a question of increasing housing supply, it is much more complex and a proper analysis should examine associated questions such as: why have real wages in the UK increased so slowly? Slow growth in wages means that house prices have outstripped the growth in real wages, and so affordability ratios have fallen. A sound, sustainable economy will not be built by housebuilding alone and to pursue this path is to embark on a policy that could well end in ignominious failure, with a housing bust similar in scale to that experienced in Spain and Ireland. But what other factors are important in determining house prices and affordability?

When considering this issue of affordability, and the approach of building more dwellings, there is an implicit assumption that the only determinant of house prices is the balance between supply and demand. But this is a nonsensical assumption. In 2008, when house prices in many regions of the UK (and across the world) started to crash, this was not because of a sudden massive increase in supply.

Many other factors were clearly at work. Other factors that are important in determining house prices include:

The cost of credit – the interest rate: effectively this is set by government policy via the Treasury and then by the Bank of England. This has been extremely low for 5 years, and is set to remain low for the foreseeable future. Even before the reduction in the Bank of England rate to 0.5%, the real cost of credit had been low for many years – largely because the governments preferred measure of inflation, the CPI, does not include a measure of housing costs. The current very low cost of credit means that mortgage payments as a percentage of take home pay are lower for first time buyers than during previous property booms of 2005-7 and 1989-90. House prices are set by what people can afford to pay, and so property prices have climbed.

The availability of credit. At the very least this is regulated by government, but in practice it is effectively set by government policy, for example, quantitative easing has resulted in huge credit expansion leading to asset price inflation, including house price inflation. Current high house prices are a direct consequence of the economic policies of successive governments, spanning a period of

at least 20 years.

Various schemes to assist buyers such as "Help to Buy" have enabled house builders to increase or maintain prices, so that much of the subsidies government pays ends up as builders profits. This is because, for example, equity loans are available only on new build properties.

Housing subsidies paid by the government. In 2015, about £24 billion was paid out as housing benefit, of which about £8.8 billion was paid to private landlords. Consequently, housing benefit has largely driven the buy to let boom. With a secure rental income, buy to let landlords can bid up the price of houses, beyond the reach of other buyers.

The growth of "buy to leave", which is driven largely by money from overseas, some of which comes from the black economy and illegal activities in overseas countries. Overseas buyers effectively use a house in the UK (predominantly London and its environs) as a safe deposit box in the sky. This has led to a significant number of properties in London being sold to overseas buyers, who have no intention of living there – but their investment is safe and likely to appreciate in value. In the years 2015 and 2015, Asian buyers alone paid \$24 billion for UK property, of which \$20 billion was in London. This forces London residents to move out to the suburbs and beyond, pushing up prices across the whole of the south east. Brexit and associated financial instability is likely to have an impact on this, and it may create a downturn in the London housing market.

Taxes – not just stamp duty but other taxes contribute to the high final cost of a house. Taxes and levies on the excavation of raw materials from quarrying coupled with high landfill taxes increase the final cost of every house built, so that stamp duty is just another layer of tax – the icing on the taxation cake for government. What extraction taxes and energy policies have done is force the closure of British brick plants, cement makers, etc, etc. Now that there is a construction boom, building materials are being imported from all over Europe – bricks from Germany and further afield, roof tiles from Belgium, cement from France, etc. This leads to large increases in prices when there is an increase in construction – over the 5 years to 2016 brick prices increased by 25%, cement by 17%.

The living wage will increase the pay of unskilled workers, such as labourers. Even in the recent past, a construction boom was a major stimulus for the British economy, but this is no longer the case because so much building material (and workers) are now imported. In 2015, the value of total imports of building materials from EU countries was £4.9 billion.

In addition, the Landfill Tax ensures that land is not used efficiently – it is cheaper to build large surface area car parks than to excavate and build car parks underground so that even when multi-storey car parks are built, they generally have no basement – because of the high cost of excavation due to high landfill taxes.

Guildford town is a classic example of inefficient land use, with large surface car parks at the university; park and ride car parks, at the railway station, and at employers throughout the town. This is a grossly inefficient use of land, but this inefficient land use is a consequence of government policy.

Profit margins of developers, which are currently somewhere between 20 to 30% on the cost of a house, even after high, exorbitant salaries are extracted from the companies for company executives.

As an example, Berkeley Homes has in place the most generous bonus system ever put in place by a British company, with £1 billion due to be distributed to company executives if certain targets are met – and the company is en route to meet these targets, mainly because of its ability to set and maintain high house prices. The chairman of Berkeley Homes was one of the highest paid persons in

the UK in 2015, with his benefits amounting to more than £22 million for the year.

Profit margins enjoyed by housebuilders would not be tolerated in government regulated industries such as utility companies, or in food retailers, etc. It applies to the most expensive purchase the vast majority of purchasers will ever make, and it shows clearly that the housing market model used by the government (supply by the private sector only) is working only to benefit developers. It is functioning as a free market – but it is not a true free market because of the other factors that determine house prices such as government subsidies, including housing benefit. These create a win:win housing market for developers. The ability of developers to control housing supply is a major problem with the housing market – it is not the planning system that limits the supply of new dwellings, it is developers ensuring that they can maximise their profit margins by drip feeding new builds onto the market. The Local Government Association stated that there are potentially 400,000 dwellings with planning permission but construction had not been started. So the problem is in the operation of the market, not in the planning process. Reforms to the way that the housing market operates are long overdue, for example, through a large social housing programme, managed by a national housing executive.

Government regional policies also have an impact on house prices. This is evident in the way that property prices have or have not recovered after the property price crash in 2008. Not all regions currently have higher house prices than their 2007 peak values: This is clear evidence of an ineffective regional policy, and shows the publicity around creating a “northern powerhouse” is hyperbole. One strand of an effective regional policy would ensure that a genuine free market was allowed to run its course, so that as building in London and the south east became more difficult and expensive (due to strong planning policies protecting the Green Belt and countryside) development would be pushed to other regions, ensuring these regions grew. Instead, the government seek to make it easier for developers to build in areas with the highest growth, by weakening planning policies, so that development is concentrated in London and the south east, especially in the countryside. The effect of this policy (in reality the lack of an effective regional policy) means that demand for development of all types continues to grow in and around London, so that house prices can be increased and controlled by developers. This increases the wealth gap between the London plus the south east and other regions, and limits employment growth in these areas.

Immigration has a major role in the supply and demand equation – if the rate of immigration were not so high, the demand for housing would be substantially lower. Migration Watch have estimated that at least 40% of the housing demand is due to immigration, but their estimate was based on a lower number of migrants than the current level of immigration, and does not include the impact of the children of migrants, nor does it include the demand from illegal immigration. Thus the government’s immigration policies have had a major impact on the demand for housing.

Immigration also has an impact on pay – it helps keep pay levels low, so that employers are not forced to pay more to help with recruitment. This has an impact on affordability ratios. Although there is a construction boom, with a supposed shortage of skilled workers, pay within the construction industry has not increased as rapidly as it has done in the past. This is because employers can recruit immigrants, who will work for lower rates of pay, for example, 50% of sub-contractors working for Berkeley Homes are from eastern Europe. So not only does this policy have an impact on the supply part of the housing equation, but it also has an impact on the ability to afford housing by keeping pay rates lower than they would otherwise have been. A recent estimate by employers was that pay rates for skilled workers in construction have increased by 6%.

Historically, this is a very low increase for pay rates in the middle of a construction boom. If immigration policies change as a consequence of the Brexit vote, the pressure placed on housing supply by immigrants will fall, and this should be reflected in revised housing policies.

Annexe 2

Contribution to Traffic Movements and Air Pollution

The Local Plan proposes building a minimum of 693 houses per year, of which 2,400 (17%) will be built within Guildford. The remainder (83%) will be built in the countryside. This is very much against advice from the Institute for Air Quality Management. Intuitively, it seems likely that this spatial distribution of housing would increase car and van journeys with a consequential increase in air pollution that is related primarily to vehicle emissions. This paper examines statistical evidence to assess the impact on vehicle journeys within the borough.

Spatial Vision

The spatial "vision" proposed in the Local Plan is the reverse of that recommended by the Institute for Air Quality Management, who said⁸

"The pattern of land use determines the need for travel, which is in turn a major influence on transport related emissions. Decisions made on the allocation of land use will dictate future emissions, as many people and businesses will make significant use of road transport for journeys between places that form part of their daily lives."

This has not been recognised in the spatial planning within this plan, which proposes that a large majority of new dwellings should be in rural areas, some considerable distance from the urban centre and employment centres. It is a plan that could have been written specifically to increase road traffic.

This report also suggested that

"Ideally, air quality should be a prime consideration for long term planning, so that land is used and allocated in ways that minimise emissions and that reduce the exposure of people to air pollution." This has not been part of spatial planning, but it should have been, even though there is no statutory requirement to do so. However, there is a statutory requirement to declare an air quality management area (AQMA) in areas that are known to have high pollution levels, but this has not been done within the borough. This is despite requests to the council to set up an AQMA following air quality tests that show high pollution levels in at least one village which has high traffic levels.

Sustainability

To examine the claim that the draft Local Plan contributes to sustainability several areas could be analysed. One of these is the impact on traffic, to assess the impact of adding additional housing in the countryside rather than in Guildford centre. This can be gauged by comparing the likely impact on car ownership of building housing in a rural location as opposed to an urban area of Guildford.

Effingham has been chosen for this, but it could be any of the rural villages in the borough, and the impact of additional housing in this village is compared with additional housing in an urban area, Walnut Tree Close/Station area. This can be done using census details, taken from the Office for National Statistics (ONS) publications, so that availability of cars and vans can be compared as well as methods of travelling to work.

What have traffic levels to do with sustainability?

Traffic is a major contributor to air pollution, and air pollution has a significant effect on health. In April 2014, Public Health England produced a report⁹ that reconfirmed the estimate by the Committee on the Medical Effects of Air Pollutants that approximately 29,000 deaths per year in the

UK could be caused by pollution from man-made particulate matter. This report estimated that there were 55 deaths per year in the borough attributable to air pollution. Particulates are very small air borne particles and transport is the single largest contributor to particulate pollution. But air pollution is not limited to air borne particles - it includes many other pollutants, and one group that affects human health, especially that of children, is the gaseous oxides of nitrogen, nitrogen dioxide (NO₂) and nitrogen monoxide (NO). When taken together these are usually called NOx. Nationally, almost half of these gases are produced by transport. In a submission to the House of Commons Report "Action on Air Quality" published in November 2014, Dr Ian Mudway of King's College, London said:

"We have also found effects on infant mortality rates, on pre-term birth and on cognitive performance in children. There is some interesting data emerging on traffic proximity, diesel emissions and traffic potentially autism spectrum disorders... The evidence over the last three or four years that children growing up near traffic in areas with high NO₂ and primary particle emissions have stunted and impaired lung development is incredibly strong."

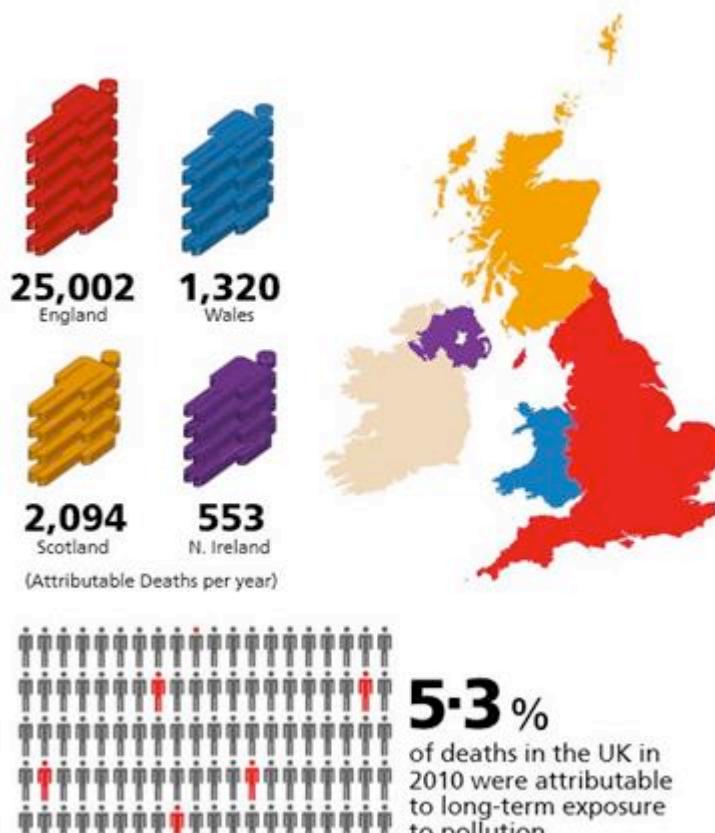
As well as health aspects, road safety is also important – increased traffic levels means more congestion, more delays, more stress, and inevitably, more accidents.



Areas in London exceed the EU limits for various air-borne pollutants, in particular, NOx. This has been on a scale that will result in the imposition of substantial fines on the UK government – and the UK government has expressed a desire for this to be passed to local government in areas that are out of compliance. Although Guildford Borough has a very limited air pollution monitoring regime they have one station that regularly exceeds limits – that at Wisley. Even though this is very poorly sited (meaning that the actual NOx concentration in this area is considerably higher than that being recorded) it has consistently been above EU limits. Thus the borough's taxpayers may have to share in the costs of the EU fine.

Since traffic has a major impact on air pollution, and as air pollution has a significant impact on health, especially that of children, it is an important element in sustainability – so the impact on traffic levels of housing policies should be assessed, in detail, before making claims that housing policies are "sustainable".

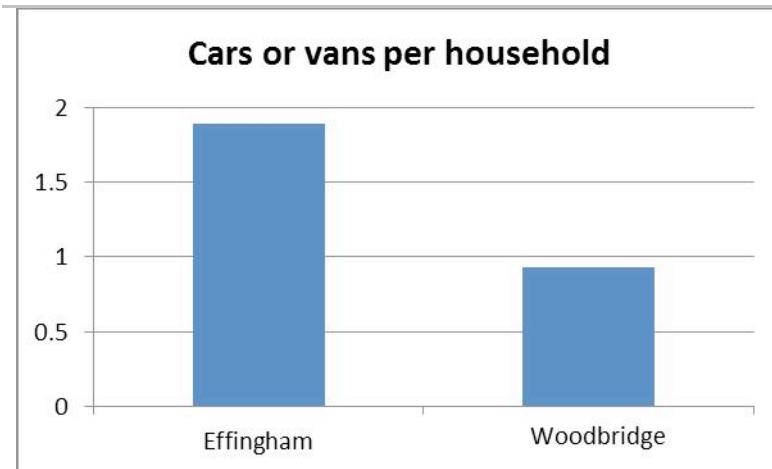
Deaths attributable to air pollution, 2010



Source: Public Health England

Detailed Traffic Comparisons

Levels of car ownership vary substantially, as can be seen from the figure, taken from the data in Table 1. This data is taken from 2011 ONS Census data, as published in the series "Neighbourhood Statistics".



The average number of cars or vans per household is highest in Effingham, with an average of 1.9 cars or vans per household in Effingham in 2011, compared to an average of 0.93 cars or vans per household in Woodbridge Meadows/Walnut the Station. This suggests that plans for high levels of development in the countryside go against all the ideals of achieving sustainable developments as car and van availability is an indicator of how often those vehicles will be used.

Table 1 Comparison of availability of cars or vans

	2011	2001
Effingham (Parish)		
Average cars or vans/household	1.89	1.75
Households without cars or vans (%)	4.7	7.3
Woodbridge Meadows, Walnut Tree Close and the Station		
Average cars or vans/household	0.93	1.01
Households without cars or vans (%)	34.2	30.0

In Effingham, there are very few households that do not have a car or van available, at 4.7% of total households, compared to 34.2% in Woodbridge Meadows, Walnut Tree Close and the Station.

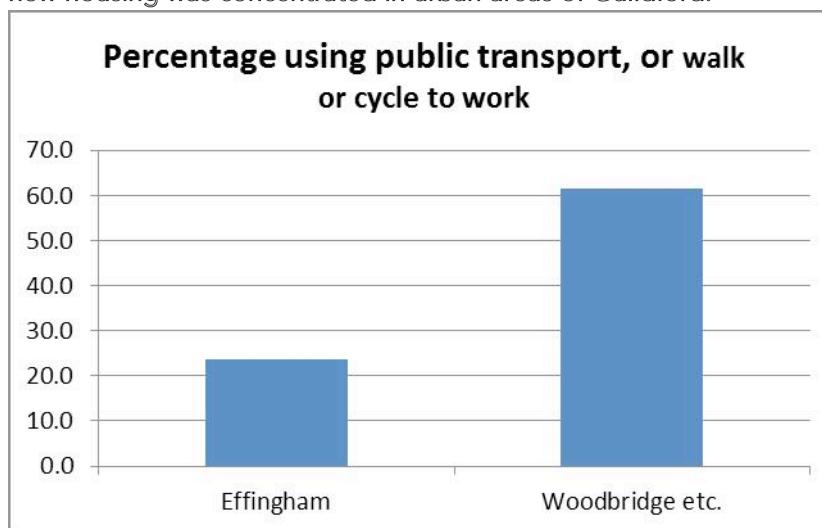
Given the limited range of shops and services available in rural villages this should not be surprising. Most residents have to drive to be able to access basic health services, and for all but the most basic of shopping needs, employment opportunities, etc. This shows very clearly that it is very likely that there would be increased traffic on the roads throughout the borough as a consequence of additional housing in the countryside, and that this increase in traffic would be lower if additional housing were built in the centre of Guildford.

Experienced city planners such as Lord Rogers have called for increased density in towns and cities as a way to provide extra housing, provided increased density is accompanied by improved amenities and sensible traffic management plans. This is because of the benefits of increased density – towns and cities work better, with better public transport, better access to services, and a reduction in car journeys. Woodbridge Meadows, Walnut Tree Close and the Station are ideal locations for increased population density – the railway station is within walking distance, as is much of the town centre. This is recognised to a limited extent by the Masterplan prepared for Guildford Borough Council, but does not seem to have been recognised in the 2016 draft Local Plan.

As the 2011 census had details of the methods used to travel to work, it is possible to test if traffic implications are in line with these expectations.

Methods of travel to work illustrate differing patterns of car and van use, with the details given in Table 2. In Effingham, only 14% of employed people who travel to work use public transport and almost 75% travel to work by car or van. Only 8% of those who travel to work walk or use a bicycle in Effingham, whereas in the Woodbridge Meadows/Station area the comparable figure is almost 33%.

Differences are illustrated in the figure showing the proportion of people who travel to work using public transport, walk or by bike. Building more houses in the countryside will result in many more car journeys – just to get to work. Many more would also be necessary, for residents to shop, to access financial and health services, etc. This shows clearly that car journeys would be minimised if new housing was concentrated in urban areas of Guildford.



Sensible planning should seek to improve the ability to use these modes of transport and the impact on the number of car or van journeys is very clear from the comparisons made here. This type of analysis should be a feature when choosing to claim an option is "sustainable", but it has not been a feature of the draft Local Plan. Claims made that building housing in rural areas is a sustainable option do not stand up to simple scrutiny, even without the consideration that it is proposed to build housing on the limited resource that is farmland.

Table 2 Comparison of Methods Used to Travel to Work in 2011

Travel to Work, 2011	Effingham	Woodbridge Meadows, etc
Percentage of those in employment working from home	10.5	5.2
Percentage of those in employment travelling to work by car or van	66.9	34.4
Percentage of those in employment and who travel to work, by car or van	74.7	36.3
Percentage of those in employment travelling to work on foot or by bike	7.1	30.9
Percentage of those in employment and who travel to work, on foot or by bike	8.0	32.6
Percentage of those in employment travelling to work by	13.9	27.4

public transport

Percentage of those in employment and who travel to work, by public transport	15.5	28.9
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Conclusions

The spatial planning in this draft plan will increase traffic movements and consequently, air pollution. Air quality should be a constraint used to limit the housing target. Even with a lower housing target, instead of what is proposed a higher proportion of housing developments should be within Guildford town. This could be achieved by recognizing that an expansion in retail and warehousing and distribution within the urban area is not sustainable, and the land set aside in the town centre for these used instead to provide housing. GBC should also have used the local plan to set targets for air quality, with proposals to reduce noxious emissions, for example, through the use of LPG fueled public service vehicles, as is happening in other areas, such as Birmingham. This has not been done; there is no proposal to tackle existing air pollution or to alleviate the pollution caused by adding approximately 24,000 cars and vans to those already in use within the borough, based on car ownership levels in a rural village and an urban area in Guildford. This is the approximate number of vehicles that the proposed housing additions would bring, thought his number would vary, dependent on where the additional houses are located. If all the proposed housing were within Guildford, then instead of 24,000 about 13,000 cars and vans would be added to the existing total.

In the census of 2011, the total across the borough was just under 54,000 cars and vans.

The comparisons made above show that traffic and air quality has not been considered in the spatial allocation of housing. Sustainability claims have not been analysed in drawing up the housing proposals featured in the draft Local Plan. A simple comparison of only one aspect of sustainability, car use (with its associated air pollution), shows very clearly that building extra housing in Effingham (a typical rural area village) is the least sustainable option. As a method of travel to work, car use in Effingham was shown to be much higher than in an urban area of Guildford, so to limit increases in traffic and emissions from traffic, housing should be provided in areas closer to employment opportunities and with access to good public transport. This does not mean that no additional housing should be provided in the countryside, but this housing should be limited in quantity, in keeping with its Green Belt status.

12 POLICY H3 RURAL EXCEPTION HOMES

We object to this policy which allows potential development OUTSIDE settlements even in Green Belt and includes wording to propose extension of this policy for Market housing. This is a Trojan horse to allow development where it would not otherwise be permitted. Ensure it is made clear, as part of the policy (blue box), that this is an *exceptional* scheme only and that the overriding requirements of the NPPF, especially NPPF 87, 88 and 89, will apply in the administration of this policy so that it will only apply in exceptional circumstances. Far from being exceptional, this policy seeks to introduce a scheme where housing could be built anywhere, with no restriction, other than the general link to some form of connection with the Guildford housing list.

Re rural exception sites, the NPPF deals with this in NPPF 54 which states: “*In rural areas, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate*”. This clause makes it clear that housing in rural locations should reflect local needs particularly for affordable housing. In this context local should imply with a direct connection to the local community only, not the wider community within the borough.

The following extract from the National Planning Policy Guidance is relevant:

Paragraph: 034 Reference ID: 3-034-20140306

Can unmet need for housing outweigh Green Belt Protection?

Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.

Revision date: 06 03 2014

In fact it is clear that Guildford Borough Council sees rural exception housing not as an exception but as a normal mechanism for supply while disregarding the constraints of the Green Belt.

It uses existing and projected affordable housing within the villages not in order to meet local needs but as a response to the general housing list,. This, per the NPPF, is inappropriate. It is symptomatic of the manner in which Guildford Borough treats the rural area – although containing 50% of the population of the borough- as merely ancillary to the needs and desires of the town.

This is arguably in contravention of the requirements of NPPF where housing development in rural areas should reflect local (not borough-wide) need. Such lack of earmarking has two potential problems. One is that there is increased pressure to consider too many rural exception sites which properly would not and should not be required. The preferred response to this would therefore be to earmark affordable housing within villages for demonstrable local need.

The other, which should not be overlooked, is that it has the capacity to create a rural poverty trap. In Gomshall, for example, (the site of a significant number of new affordable

homes currently being built by GBC) the cost of a single bus fare to Guildford is currently £3.50 and the cost of a single train fare to Guildford is £3.80. This is likely to prove a significant obstacle in seeking employment or the facilities needed by most members of a community (cheaper food from supermarkets; hospitals; dentists; secondary schools; junior schools (none of these are present in Gomshall)). Such a rural poverty trap is likely to be of less impact for those with family in the immediate area or those who work in the area; but for those on the general housing list it is inappropriate housing. So if the affordable housing within villages is allocated to those with local connections, the need for the rural exception scheme falls away. It should be noted that the NPPF requires the policies under which limited affordable housing for local need to be set out in the Local Plan; this should not set out the circumstances either of where these policies should apply, nor to whom they should apply – both would seem to be required.

One particularly shocking – developer led –initiative is the proposal which suggests that the rural exceptions scheme should be utilised to grant planning permission in the Green Belt OUTSIDE settlement boundaries for market housing. This is completely in contravention of NPPF.

The detail of this provision indicates that this will override all guidelines as to appropriate zones for development within the plan. It is wholly unacceptable.

NPPF 89 notes that “a local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this are:.. limited affordable housing for local community needs under policies set out in the Local Plan”. New market housing does not meet this criterion and should not be permissible. This is in clear breach of the requirements of NPPF and of planning law (St Albans, Gallagher homes) and should be deleted. There are no circumstances where it could or should be permissible to build market housing under the rural exceptions scheme.

Concerns have been expressed previously that the ordinary rural exceptions scheme could become a “Trojan Horse” policy allowing development that should not otherwise be permissible. This expression of that policy emphatically seems to embrace this concept.

This policy is much wider than the NPPF requirement that rural exception sites should be restricted to the local (i.e. parish level) need. The wording of this policy- “contribute to meeting.. local needs” means that GBC plans to use these to meet its normal housing list - the “local” is defined by GBC as meaning “*current or former residents of the borough or have a family or employment connection*“. So these would not really be *local* housing at all.

This policy requires **radical** revision in order to articulate the requirements under which the rural exception scheme might be permissible, making it clear that

- it will not be permitted except where there is demonstrable unfilled local need which cannot be met elsewhere
- make it clear what the requirements are to qualify for the scheme
- ensure it is made clear, as part of the policy (blue box), that this is an *exceptional* scheme only and that the overriding requirements of the NPPF, especially NPPF 87, 88 and 89, will apply in the administration of this policy so that the provision of

rural exception sites will only apply in **exceptional** circumstances.

Under no circumstances should the rural exceptions scheme be used to accept market housing.

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13 POLICY P1 AONB

We object to Policy P1 Surrey Hills Area of Outstanding National Beauty

Whilst the Guildford Greenbelt Group welcomes the inclusion of a policy to protect the AONB within its submission draft of the Local Plan, we strongly object to Policy P1 and its supporting text, which we consider has weakened the protection of the AONB and the AGLV from the previous draft Plan.

Much of our concern stems from the loose wording of the Policy, which in some places renders the policy ineffective, for example:

*“All proposals will be **considered** against whether they...”*

*“All development proposals within and adjacent to the AONB will be **expected** to conserve or enhance its special qualities”*

Terms such as “considered” and “expected” are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage. Of particular concern is the paragraph 3, which begins:

“Whilst the AONB designation does not preclude specific types of development in the Surrey Hills and proposals will be assessed on their individual merits...”

This whole opening clause is unnecessary and almost invites development proposals. GGG believes that it should be deleted, and the sentence should therefore begin: “There is a presumption against major development in the AONB in accordance with NPPF.”

In addition to the weakness of the language, GGG is also concerned that the AONB criteria listed in the policy are not the most important ones in determining whether a planning application should be approved. Aside from the one outlined in the first bullet point (which relates to the AONB setting) none of these criteria is concerned with the key characteristics of AONB, ie landscape character, scenic beauty, important views, tranquility etc. Whether or not a development supports the rural economy or provides public access are of far less national importance than preserving the quality of the landscape itself.

GGG believes that the AONB Policy in the Draft Plan 2014 provided greater protection to the AONB, and would like to see the following sentences reinserted:

- *“The national significance the AONB will be afforded the highest level of protection and only proposals which can be sensitively amalgamated into the area and which complement and enhance the character of the AONB will be considered”*
- *“Proposals within the AGLV which would have a negative impact upon views into and out of the AONB and which do not respect the setting, will not be acceptable”*

- *In accordance with the most up to date Minerals and Waste Plan, safeguarding of applicable land within the AONB and/or AGLV may be necessary and deemed appropriate*

Finally, GGG would like to see a clause which gives protection to the candidate areas for AONB status in the forthcoming Surrey Hills AONB Boundary Review. We consider that all land that has been assessed as meeting the latest Natural England criteria for AONBs should be subject to the same level of protection as an AONB, not just land that has been designated AGLV.

It has been noted that CPRE have proposed alternative wording for the AONB Policy 1 in their own submission, and this wording would be a more appropriate protection for the AONB than that offered in this current policy wording.

As this stands, the wording is far too weak and does not comply with the requirements of the NPPF.

14 POLICY P2 GREEN BELT

We object to Policy P2 green belt

This policy states, “the general extent of the Green Belt has been retained.” We do not accept this statement.

The policy wording is weak in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. It is an inalienable public good. Once gone it is gone forever. It is not the Council’s to give away.

Policy P2 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. Building on it involves high opportunity costs, including an irreversible loss of:

1. Agricultural production
2. Rural leisure and tourism amenities
3. Water catchment
4. Flood control
5. Biodiversity
6. Natural heritage
7. A carbon sink for air pollution
8. Room for public facilities such as parks and burial grounds
9. Profitable film locations (e.g. Shere)
10. Future economic potential such as mineral extraction (even fracking)
11. Natural beauty, landmarks, open space, rural views and sight lines
12. Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)

As a matter of law and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations.

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 insetting, 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 "insetting" of 14 villages 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 and that infilling is also proposed outside the settlement boundaries of 11 further villages. 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.

We believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors.

To “inset” two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. WEcannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed “insetting” and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need (especially post-Brexit) and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

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15 POLICY P3 COUNTRYSIDE

We object to this policy, taken in the light of the other policies proposed within the local plan.

There is huge emphasis on provision both of services and of additional Green Belt in Ash and Tongham. We object to this policy. It is not clear why new Green Belt should be designated here, while the Green Belt is being rolled back in all other areas of the borough. The only notable fact is that the Leader of the Council and other Executive members are based in this area and the question of impartiality does need to be raised.

Note that in the recent judicial review in relation to Ashdown Forest, the SANG zone for the Ashdown Forest SPA was 7km, and this gave rise to a lower housing number than that proposed by this local authority.

The urban areas of Ash and Tongham are indeed of importance within the borough, creating a barrier between the countryside of Guildford and the urban towns of Aldershot and Farnborough.

However, as noted, it does not seem entirely appropriate to seek to reduce Green Belt designation everywhere else in the borough, on the grounds of overwhelming housing need (which is itself not an exceptional circumstance) – including land within the Green Belt and the Thames Basin Heath SPA, but then to propose designating additional Green Belt in this particular area.

If the planning policy is sufficiently aggressive as to disregard existing Green Belt, to propose significant development in that area, then it is inappropriate, and in contravention of existing planning law, (*Gallagher Homes v Solihull* as determined by the Court of Appeal) to consider proposing new areas for Green Belt. It is unclear why the strategic gap that separates the Ash and Tongham urban areas from neighbouring Aldershot is of greater significance to the borough as a whole, than other threatened Green Belt villages and fields.

The desire to protect the strategic gap between Ash and Tongham and Ash Green is welcomed, and provided that this does not arise because of a loss of Green Belt land elsewhere, the proposal to include some of this land within the Green Belt is welcomed too. However, Green Belt boundaries should not be traded off. One village community should not benefit to the detriment of another. The proposed extension of Green Belt designation to Ash and Tongham is unlikely to succeed, because it is not inherently better at serving the purposes of the Green Belt than other areas threatened by development,

and a similar attempt in Solihull was wholly unsuccessful. The Court of Appeal decision will represent a precedent in this regard.

As noted in Gallagher Homes v Solihull, the NPPF is based on PPG2 which is quoted in a similar context to this proposal:

"If such an alteration is proposed the Secretary of State will wish to be satisfied that the authority has considered opportunities for development within the urban areas contained by and beyond the Green Belt."

In other words, before altering Green Belt boundaries (to use for building), land beyond the Green Belt should be considered as building land first; and first of all, brownfield urban land should be used. Provided that the Green Belt is not subject to the wholesale assault then this extension might be acceptable to the wider community within the borough. It will not be acceptable as a trade-off for loss of the Green Belt elsewhere.

Policy P3 States that 'development will only be permitted provided it:

"requires a countryside location or where a rural location can be justified, and

is proportionate to the nature and scale of the site, its setting and countryside location, and

does not lead to greater physical or visual coalescence between the Ash and Tongham urban area and Aldershot".

We would like to know what the rural justification of proposed housing has for Ash and Tongham and how Guildford Borough Council proves that contributes to the rural economy? In the Local Plan, Guildford Borough Council refers to these Eastern Borough proposals as 'extensions to urban boundaries'. Developments of 1241 and 91 homes cannot possibly meet the necessary term 'rural justification' (The site allocation maps show different figures of 1200, 62, 58 homes)

As far as we can tell with the corresponding maps, the proposed developments in Ash and Tongham will create a greater coalescence between the separate villages to combine them into one urban area with a slither of green space between it and the A331/Aldershot.

Designation of Green Belt does not guarantee a barrier between Ash and Ash Green as Guildford has demonstrated the urge to move the Green Belt boundaries in communities elsewhere. We would suggest removing the allocation of further Green Belt designation as it does not follow NPPG Policy. There are no exceptional circumstances to allow changes in Green Belt Boundaries in Guildford.

It is also not clear what the impact will be of designating SANG in this area, and whether this will be used to permit building on Green Belt or land otherwise protected because of the Thames Basin Heath SPA designation elsewhere.

Ash and Tongham have countryside designated Ancient Woodland, AGLV and SNCI and a sensitive historic site which must be protected. This, together with a focus on using existing brownfield within the urban settlement area and a more realistic housing number, should succeed in protecting the valuable countryside around Ash and Tongham, while the attempt to adjust Green Belt boundaries seems doomed to failure and therefore will allow wholesale overdevelopment in this area.

16 POLICY P4 FLOOD RISK

We object to 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.

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17 POLICY P5 SPAs

We OBJECT to this policy. This policy is weak.

The mitigation (cash compensation) offered for development in the special protection area is so small and negligible as to be meaningless.

SANG (Suitable Alternative Natural Greenspace) is not beneficial; the sites identified or targeted are already green space.

To create SANG is just using agricultural or wooded land as recreation land in order to justify building on other green spaces.

There is no actual increase in environmental protection; it is a policy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds - must ensure that it is not using land which is adjacent to the special protection areas.

Thames Basin Heaths Special Protection Area (TBH SPA; see Map 1, Appendix 1), is a statutory designated site and designated for its rare and vulnerable birds, specifically nightjar, Dartford warbler and woodlark under the EC Birds Directive. This site also forms part of the Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC), a statutory designated site and designated for its North Atlantic wet heaths, European dry heaths and peat bogs.

We believe that the Plan is unsound as the Habitats Regulations Assessment prepared for GBC does not take sufficient account of the impact seven proposed developments will have upon the Thames Basin Heaths Special Protection Area (TBH SPA) which is a European Site (as defined under the Habitats Directive and Conservation of Habitats and Species Regulations 2010 (as amended).

The seven proposed developments are less than five kilometres away from the TBH SPA and in some cases not much beyond the 400m exclusion zone, occupying an area between under 1km to just over 2km from the TBH SPA. It has been indicated that the cumulative effect of further residential development up to 5 km from protected heathlands will have a significant adverse effect on the heaths. The TBH SPA is an internationally important habitat for three rare species of bird - the Dartford warbler, woodlark and nightjar. The latter two are ground nesting and therefore particularly susceptible to disturbance from people and animals. In fact Natural England believes that recreational use of the heaths arising from housing developments up to five kilometres away from a SPA will create disturbance to rare bird populations.

A survey in 2008 showed that more than 83% of visitors to the SPA arrived by car and that 70% of those had come from within 5km of its access point. A very large proportion of the TBH SPA visitors are dog walkers, many of whom visit a particular site on a regular basis. A follow-up survey in 2012 found that there was a 10% increase in visitors to the SPA.

A survey of households carried out by a veterinary team at Bristol University in 2010 “Number and ownership profiles of cats and dogs in the UK” published in the Journal of The British Veterinary Association indicates 31% households own dogs and 26% households own cats. Dogs

were more likely to be owned by rural households.

Applying this analysis for all new housing at the listed strategic housing sites in the draft Local Plan within the 400m-5km mitigation zone of TBHSPA (in total 7,000 new homes), the cumulative impact of dog ownership (up to an estimated 2,200 new dogs within 5 km of TBHSPA) with dog-walker incursions on the rare bird species habitat of the TBHSPA will be a devastating increase. No amount of SANG nor SAMM programmes will change human behaviour and the draft Local Plan evidence base contains no studies or data to prove otherwise, it contains only unproven assertions. Natural England can provide no survey evidence of the effectiveness of SANG or SAMM programmes in attracting dog-walkers and other visitors away from TBHSPA.

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18 POLICY E1 SUSTAINABLE EMPLOYMENT

We OBJECT because

- the evidence base is unreliable
- there is unclear differentiation between B class uses
- only high added-value business uses are desirable, not low grade, low employment warehousing which is land hungry
- industrial and commercial businesses must be concentrated in the urban area, or existing business parks (eg Slyfield) not in the rural environment which the infrastructure is unable to support
- the rural environment must support micro or high tech businesses, agricultural industries, and tourism, and these sectors must not be damaged by general industrial development which is inappropriate

Full response

We OBJECT to this policy.

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. We believe Guildford should target high added-value small and medium sized enterprises or the headquarters of larger corporations, but not provide low added value warehousing and industrial space.

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

No proper analysis has 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 without any attempt at real market demand apart from vague references to freely available market research undertaken by commercial estate agents. (See definitions of B classes at end of this policy response).

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 (mostly local office use/R&D) generates at least 5 times as much employment as B8 (distribution and warehousing).

This draft Local Plan is partly based on new findings by Aecom in the latest ELNA 2015 [Employment Land Needs Assessment 2015]. This includes the recasting of the ELNA by Aecom in 2015 which updated the ELNA 2013 prepared by GBC. We have had regard to the evidence base provided by Aecom in the 2015 ELNA and find it a more reliable evidence base for overall projected employment in the borough over the plan period in overall numbers than done previously by GBC in 2013. However, we have concern that the survey work by Lambert Smith Hampton is in the form of high level free property research that is used for the purposes of

marketing their services over a wide area not specifically commissioned for the borough of Guildford and undertaken for ELNA purposes.

However, we are concerned that the research undertaken by Aecom is generally 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.

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. 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 wealth necessary to fund the infrastructure and environment this sort of industry requires.

We need to promote the idea of new knowledge transfer in incubator units and small premises for new start up enterprises. We need to be on the wave of innovative new technology as opposed to older established businesses. High value-added industry is desirable; low tech, land-hungry older businesses which will increase congestion are not desirable.

We have concern as to the ill-informed clustering of all B classes. This is unclear in terms of market evidence required to inform effective planning. There is a failure to provide a clear understanding of business needs within the relevant area as required under Section 160 of the NPPF.

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.

Little regard is had to the opportunity of 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 do not support the policy of creating Strategic Employment sites outside the urban centres.

Some of the strategic industrial sites would be better classified as brownfield land suitable for use as a residential area, eg Woodbridge Park, Woodbridge Road and Merrow Lane.

This study varies very significantly from the previous Guildford Borough Council ELNA 2013, which after two years has been completely re-written. This leads us to question the reliability of the evidence base here which has been used to justify the assumptions and plans; it is unclear that the current evidence base is any more reliable than that used previously. This calls into question the general reliability of the process of collection and interpretation of data in the overall forward planning process by GBC.

DEFINITIONS:

B1

Business

B1 building use is use for all or any of the following purposes:

- (a) as an **office** other than a use within class A2 (financial and professional services),
- (b) for **research and development** of products or processes, or
- (c) for any industrial process, being a use which can be carried out in any residential area without detriment to the amenity of that area by reason of noise, vibration, smell, fumes, smoke, soot, ash, dust or grit.

General Industrial

B2 building use is for the carrying on of an industrial process other than one falling within class B1 above or within classes B3 to B7 below. (Note: B3-B7 relates to very heavy industry such as oil refining, smelting etc).

Distribution or Storage

B8 building use is for storage or as a distribution centre.

We note that there is a significant reduction of between 71% and 79% in the previous job target and resultant 79% reduction in employment space in response to the many objections lodged in 2014 against an unsubstantiated agenda for economic expansion in the last draft and based on new findings by Aecom in the latest ELNA 2015.

We have concern as to the ill-informed clustering of all B classes in terms of the clarity of market evidence required to inform effective planning and a failure to provide a clear understanding of business needs required under Section 160 of the NPPF.

We also note the dramatic reduction in assessed demand by two Employment Land Needs Assessment Reports carried out under the same terms of reference within a period of 2 years which calls into question the general reliability of the process of collection and interpretation of data in the overall forward planning process by GBC. We do not support the policy of creating a Strategic Employment site at Garlick's Arch (A43) in the Green Belt which is completely unnecessary due to the overall decrease in demand for industrial space which could be easily accommodated at Slyfield.

We are concerned however that the research undertaken by Aecom is generally 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.

No proper analysis has 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 appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of useful property market research 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.

Little regard is had to the opportunity of 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 note that the past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 derived from VoA analysis and that the calculated annual floor space demand is 0.7% over the plan period up to 2033.

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 We 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.

We object to the policy of creating a Strategic Employment at Garlicks Arch (A43) in the Green Belt. The stated requirement of 7,000 sq m (B1c, B2 and B8) could easily be accommodated at the Slyfield Regeneration site of 40 ha.

19 POLICY E2: LOCATION OF EMPLOYMENT FLOORSPACE

We OBJECT to this policy as it stands. We are of the opinion that all new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre. We do not support the policy of expanding the Research Park onto Blackwell Farm and we do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt

- The Surrey Research Park currently extends to 65,000 sq m
- There is already granted consent to expand to a further 9,000 sq m (14%)
- The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis
- The ELNA 2015 calculated annual floor space demand is 0.7%
- The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period.
- The necessary growth in floor space over the plan period is therefore 17 years x 0.7% = 11.9%
- There is currently 14% expansion space already available
- The proposal by GBC to expand the 65,000 sq m by 9,000 sq m (existing allocation) with an additional 35,000 sq m amounts to an increase of 67% of the Research Park which is not required
- The Research Park is currently developed at a density of 25% plot ratio. The majority of existing buildings are 2 storeys giving a developed floor space plot ratio of 12.5%.
- The existing Research Park has the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing densities of existing academic buildings on the university campus which are three to four times higher.
- Together with the existing expansion of 14% through existing consents and the opportunity to increase its density the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university.
- A preferred location for increased B1a and B1b space should be on other existing sites close to housing and a convenient transport hub

We are of the opinion that all new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre.

We object to the policy of expanding the Research Park onto Blackwell Farm and we do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt

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The ELNA 2015 calculated annual floor space demand is 0.7%.

The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period. The necessary growth in floor space over the plan period is therefore 17 years x 0.7% = **11.9%**.

There is currently **14% expansion space** already available.

The proposal by GBC to expand the 65,000 sq m by 9,000 sq m (existing allocation) with an additional 35,000 sq m amounts to an increase of 67% of the Research Park which is not required.

The Research Park is currently developed at a density of 25% plot ratio. The majority of existing buildings are 2 stories giving a developed floor space plot ratio of 12.5%.

The existing Research Park has the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing densities of existing academic buildings on the university campus which are three to four times higher.

Together with the existing expansion of 14% through existing consents and the opportunity to increase its density the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university.

We do not accept that the valuable and workable concept of the Research Park should have its integrity and purpose diluted by being converted into yet another Business Park for office users rather than research organisations

A preferred location for increased B1a and B1b space should be in the Town Centre close to housing and a convenient transport hub

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20 POLICY E3 MAINTAINING EMPLOYMENT CAPACITY

We object to Policy E3 maintaining employment capacity

We do not support the 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 and is contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).

Full response

- We believe that the existing government policy which has recently been made permanent of allowing change of use from B1a to C3 is sound
- Many office buildings reaching an age of more than 30/50 years become redundant in terms of energy compliance making them illegal to occupy for employment purposes and the cost of refurbishment makes them redundant and uneconomic
- The reality of market demand is that the gross development value of refurbished residential space is in excess of the gross development value of refurbished old office space in many locations (this gross development value assessment is supported by the analysis by property consultants GVA in the supporting evidence within the Allies and Morrison Masterplan for Guildford dated 2015)
- Office space is available and the turnover of office space in Guildford is slow, which would seem to indicate that there is excess office capacity relative to demand
- To resist change from B1a to C3 is contrary to the concept of brownfield first for residential development schemes
- To resist change from B1a to C3 in Strategic or Significant Employment Sites is contrary to the concept of integrated mixed use communities whereby the journey to work is minimised
- London has led the way with significant residential schemes being created from redundant office stock. A good example is the South Bank in London adjacent to Waterloo Station where in 2005 the Shell Centre has been converted into flats. Another early example is the 2000 scheme at Metro Central Heights at Elephant and Castle where the old Alexander Fleming House was converted to 435 flats by St George. GBC needs to adopt more modern trends and policies.
- Guildford is in dire need of increasing town centre residential development
- The feared loss of employment will be marginal and impractical to resist. Empty office blocks are not the answer.
- We regard the evidence base (Employment Land Needs Assessment 2015 and the Guildford Borough Economic Strategy 2013-31) as flawed and inconsistent and therefore unreliable evidence
- In relation to the targets and monitoring indicators, we do not consider that the targets are desirable or sound, and therefore do not consider that the monitoring indicators are valid. Why should Guildford target 3200 additional B class jobs when it has almost full employment? Why should no employment floorspace be lost, when some of it is inappropriate and not fit for purpose? Why is it desirable to increase B1/B2/B8 floorspace?

Annexe 1

Comments on Guildford Borough Transport Study 2016

Page 2 – “address the historic infrastructure deficit” - developers are not required to do this ?

Page 2 – It is wrong to claim that the cycle infrastructure along the A25 is good – and many cyclists are not careful, so putting them in contention with pedestrians is not a good idea.

Page 5 – The decision on Heathrow or Gatwick has yet to be taken but airport expansion in the south- east cannot be regarded as sustainable development and, although GBC has no control over such external decisions, its own growth agenda will drive a need for that expansion.

Page 6 An additional weakness is alternative “road closure diversion” routes for the SRN on the LRN

Page 6 Are the “Committed Improvements” actually committed and guaranteed to be delivered ?

Page 7 The rail strategy does not provide for Wisley (residents would drive to stations)

Page 7 How long will it take to deliver Crossrail 2 ? “We hope that Crossrail 2 could be operational by 2030, but we are in the very early stages of planning and no decision to build it has been made.”

Page 7 Guildford platform capacity still many years away if ever.

Page 7 The rail strategy anticipates many improvements that have not been secured and may have unintended consequences if they proceed (see above)

Page 7 The Southern Rail Access to Heathrow ##[see the feasibility study dated December 2015 – although other proposals may be put forward (e.g. by Hounslow)]## is still in its early stages and would have significant impacts on open space beyond our Borough. For example, all options in the feasibility study would use Staines Moor SSSI and Option 4 would use Bedfont Lakes Country Park (a Local Nature Reserve and SNCI). The various options would use existing commercial, residential and highways land in varying degrees. It seems unlikely that a solution will be delivered within the Plan period and removal of highly valued open space with high biodiversity (wherever it is in South-east England) cannot be regarded as sustainable.

Page 10 and 13 There is a stark contrast between the plans for the town centre which involve encouraging a reduction in traffic by reducing roadspace and the plans for the SRN and parts of the LRN which involve increasing capacity. While increasing capacity may reduce some areas of congestion in the short term, history suggests that traffic will rapidly grow until the improved roads are congested once again. This can hardly be regarded as sustainable. A sustainable option would be to apply a very substantial traffic infrastructure constraint on the housing number.

Page 10 While the A3 Guildford Tunnel aspiration has some environmental advantages over widening (in particular for residents living close to the A3), the environmental burden of the construction phase will be far higher and aspects such as location of ventilation stacks and their local effect (in all weather conditions) do not appear to have been considered.

Page 14 Under Weaknesses the point about A roads in Guildford Town also applies to surrounding areas in the Borough and beyond. The anticipated improvements ignore existing congestion to the south and east of Guildford – presumably because SCC's transport assessment methodology only identifies the tip of the iceberg. The current Plan will see increased congestion and a resultant reduction in air quality in many areas beyond the town centre.

Page 16 "Largely commercial bus services" is seen as a strength whereas it should be seen as a weakness with a trend to reduced subsidies and the provision of bus services, especially in rural areas, being increasingly dependent on commercial gain. It is difficult to see this changing under the current Government cuts philosophy. The point "Subject to business case including funding" under Aspirations demonstrates this point.

Page 18 We welcome the aspiration to "Expand the public realm through significantly extended pedestrian-priority areas"

Page 19 Guildford is well behind other areas in monitoring air quality let alone attempting to reduce it.

The introduction talks about reductions in some pollutants. This may be the case for pollutants such as Sulphur Dioxide, which contributed to the visible London smogs, but it is not true of diesel vehicle emissions which have increased as a result of Government policy including its aggressive growth agenda and population increase through immigration.

30 accessible electric vehicle charging points are only an aspiration and will be nowhere near enough if there is a real shift to electric vehicles.

It is clear from the "Strategy outcomes" that GBC would prefer not to follow other areas in pro-actively tackling air quality.

Page 22/23/24 The timescales indicate that the main rail improvements (Including the two new stations) are unlikely to be delivered until the end of the Plan period or even later. The sites that are supposedly justified by their inclusion will generate a major increase in road traffic in the interim and it may be more difficult to achieve this aspect of modal shift in the longer term. The same can be said about the other traffic infrastructure proposals. Residential development is being scheduled before the infrastructure that it will need.

Page 24 Monitoring – "Increase" needs to be in proportion to population growth as otherwise failure will be taken as success. "An Increase in average vehicle speeds" is inconsistent with the desire to reduce the number of persons killed or seriously injured. For example, some A roads pass through residential areas where pedestrians, including schoolchildren, are trying to cross the road at peak times. It is noted that increase in vehicle speeds is only desired in the morning. Going home from work does not seem to matter !

Annexe 2

NPPF and NPPG The Plan ignores the points concerning Green Belt and protecting the environment. GBC have tried to get round this by spinning their messages and using

misleading statistics including a major understatement of the area of Green Belt to be removed.

Planning Update (March 2015) – The point in this update concerning Green Belt has been ignored

Monitoring Indicators :

Ten years is far too long to wait for information on whether the approach is working or not. The target requires only an increase. This would permit an increase less than that in line with any population growth to be regarded as success. The bar has been set well within the failure range.

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21 POLICY E4: SURREY RESEARCH PARK

We object to policy E4 Surrey research Park.

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. However, we do not believe that there is a need to expand the Research Park into a larger Business Park. We believe that the planning policy going forward for the Surrey Research Park should be to maintain and enhance the integrity of its research base allowing for the economic value add to the local economy of knowledge and technology transfer from the University. We 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 do not believe the inclusion of B1c uses is appropriate or necessary.

- 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 focussed 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
- We support the idea of a variety of sizes of unit including some small units (between 15 – 80 sq m) bearing in mind one workstation is 10 sq m
- Consideration should be given to the concept of shared “enterprise hubs” where individuals can take pay as you go workstations in shared spaces similar to touch down business centres similar to the “enterprise village” concept
- We do not support the policy of a new extension of the research park more than the existing 14% already provided for within the park
- The Surrey Research Park currently extends to 65,000 sq m
- There is already granted consent to expand to a further 9,000 sq m (14%) This space has been available for 10 years and is still to find a taker

- The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis
- The ELNA 2015 calculated annual floor space demand is 0.7%
- The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period.
- The necessary growth in floor space over the plan period is therefore 17 years x 0.7 = 12% which is less than the current expansion space of 14%.

Nature Conservation value of the site is protected or improved.

In relation to the Target there is no evidence of a justified need for additional B1a and c use. We consider that the existing land, used efficiently, will accommodate realistic expansion of B1b uses for high tech added value purposes. Existing planning permissions must be built before any additional green belt land is earmarked for development. The target of 35 000 sq metres of additional employment land are not justified by the evidence base.

We regard the evidence base (Employment Land Needs Assessment 2015) as flawed and inconsistent and therefore unreliable evidence.

22 POLICY E5 RURAL ECONOMY

We object to policy E5 Rural Economy

This policy should only apply to small-scale development in rural areas which means development of less than 100 sq m (gross) which is in keeping with and the permanence and amenity of the green belt.

Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism which mean that local people should be consulted – and heeded (not ignored!). Villages need protecting both in terms of design and in terms of scale.

Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This is disregarding the responses from the previous consultation.

It should be noted that the NPPF “provides a framework **within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans which reflect the needs and priorities of their communities.**” (NPPF 1).

Guildford becoming a Growth Hub was NOT in the election manifesto. This policy was mentioned only tangentially in the corporate plan. Given Guildford’s poor transport links, noted congestion and the problems that this is perceived to cause for existing businesses, this does not seem an appropriate decision.

This radical, unsupported policy change is apparently in order to generate "growth" - although the possibility is that too much building over the areas that make Guildford Borough attractive will actually generate damage and stagnation, and cause a net decline in local affluence and growth. This risk has been highlighted by some local business leaders in the press.

In addition to NPPF 1, the Core Planning Principles set out in NPPF 17 include, as the FIRST (and therefore most important) principle, that “*planning should*:

· *Be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area*”.

Furthermore, if this were not enough, in the section on Plan-making, NPPF 155 states:

“Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. [It is not clear that early collaboration with prospective developers is either required or legal]. A wide section of the community should be proactively engaged so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made”.

Local People are supposed to be represented within the NPPF, and any plan which does not meet with the consent of local people is arguably unsound. The failure to amend a plan following consultation, and to take the points made into account, is arguably in breach of NPPF and is therefore at risk of consequential challenge. A policy that is unsupported by the local community

should be considered to be unsound.

It is arguable that GBC is arguing aggressively for a pro-development strategy in relation to villages and the Green Belt and mis-stating national policy as a result.

Many of the proposed “main town centre” uses would not be appropriate either to the Green Belt or villages within it - indoor bowling, casinos, warehouses etc. would not be appropriate for most villages in Surrey.

The provision and take up of reliable and high speed broadband, and the increased impact of home working and smart working are welcomed. Access to high speed broadband as a priority is welcomed and this is one of few aspects of the LEP’s policy that is welcomed in relation to the rural environment.

In this context, it seems entirely inappropriate that a monitoring indicator is net additional employment *floorspace* completed by category. “Smart” and home-working do **not** involve incremental floorspace and to evaluate incremental economic growth by the size of floorspace allocated is an inappropriate measure in the Green Belt. By definition such work uses do not require space. It is important to recognize – as this Local Plan does not – that the main employment within the countryside is related to that countryside, whether due to agriculture, tourism (so that “unproductive” or open space land has a positive economic impact too), film, or ancillary activities related to the above, and that to reduce the countryside footprint by building sites is to reduce economic land. The only use of land that has no ongoing positive impact for the community is to use it as a building site, whereupon it is lost in terms of ongoing economic benefit to all except the future owners.

NPPF 17 requires that local authorities “*always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings*”, and that they “*take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognizing the intrinsic character and beauty of the countryside and supporting thriving communities within it*”. To appraise building within the Green Belt merely in terms of numbers of buildings or net additional floorspace does not meet the requirements of those principles.

The rural areas currently have a vibrant and strong economy, and building should not be regarded as a major objective. Existing agriculture, food production, tourism and film industries rely on our existing countryside, and to substitute these by building warehouses, commercial space or even processing space for ancillary agricultural processing will be to damage the environment for no economic gain. The loss of agricultural land is to be avoided; food security is an increasingly important factor in a congested island with an increasingly population based in the temperate zone so that it can supply food without climate stress; as noted by Cambridge University we will need more food producing land, not less, over the next few decades (see study attached to previous submission, disregarded).

Villages should be protected; new building in villages should be within the existing settlement boundaries, and new settlement boundaries should only reflect the historic changes of the settlement areas; building should not extend into the open countryside of the Green Belt; and new building should focus on brownfield sites within the urban areas.

We support the proposal for high speed broadband but are disappointed that the previous

reference to this specifically “*Provision and take-up of reliable and high speed broadband has been a major issue reported by rural businesses. Access to key services vital for economic growth is often poor in rural areas. Slow broadband and inadequate and slow mobile phone coverage are constraints to economic development*”

has now been modified to refer only to “*provision of internet services where needed in rural areas and enhance digital inclusion in such areas*”. This must be modified to read “*provision of high speed internet services and reliable mobile phone coverage to all rural areas etc*”. In the prior consultation, a matter that was warmly welcomed by most respondents has now been significantly weakened.

We agree that high speed broadband is a desirable attribute for the wider economy, and that this is particular lacking in the rural areas of Guildford. However, its introduction should lead to an increase in smart home-working, rather than the building of additional employment space. The policy needs to include a commitment to get superfast broadband accessible by all residents in the borough as this will provide much greater support to rural industry than anything else.

In this context, a monitoring indicator of “Number of sq m of B Class floorspace permitted and completed in rural wards” is fundamentally wrong; the indicator used for monitoring should be independent of land use, or this creates a perverse incentive to build on land. It should be related to real economic growth – for example, incremental corporation and personal tax income generated by businesses and individuals based within the borough.

Furthermore, as ever, the urban-guided planning philosophy also entirely fails to recognize the real phenomenon of rural employment. Some of this is genuine “smart” growth of the kind that the council ought to be promoting, and states that they are keen to encourage. Faster broadband, where it exists, is a genuinely useful tool which allows remote working for the highly educated populace. The University of Surrey generates a significant proportion of this highly skilled group. It also boasts about the highly skilled external population and the high calibre of local residents in its publicity material. The Surrey Hills AONB is proud to be classified by government as an “Elite Employment Enclave” where a high proportion of around 40% of households include a company director; such groups can often work flexibly. However, too much industrialization, commercialization and physical building in a rural environment will result in a change in the environment that attracts these flexible and affluent members of the community, and would result in these same groups moving to a more desirable and pleasant location. This would have a negative impact on the local economy. This consideration, while noted in public meetings in relation to the Surrey Hills by the Surrey Hills AONB board, has a general application to the borough as a whole.

In addition to smart-working among an educated group, and its economic upside, there is the fact that the rural area is founded on an agricultural framework that has persisted for two thousand years and is a viable, successful and profitable series of businesses. The land on which GBC proposes to build is viable and profitable agricultural land which supports existing businesses. Some of these are simple farms, producing food which our country needs. This should not be underestimated. The University of Cambridge has noted a significant decline in the UK’s food security or ability to feed itself – a significant factor in an era of increased climate change and global insecurity. This report, produced in conjunction with a number of other groups including CLA (Country Landowners’ Association), NFU (National Farmers’ Union), Sainsbury’s, Asda and Nestlé noted that the UK would require up to 7million hectares more agricultural land to meet the country’s needs for food by 2030, roughly the period covered by the

plan. To replace valuable and necessary agricultural land with storage depots or warehouses which will make the environment unpleasant for residents, destroy viable agricultural businesses, and that are likely to remain empty and unprofitable unless they undercut existing viable depots elsewhere, seems to benefit only those who build the depots.

While there is ostensible recognition of the importance of agriculture, this is subverted by suggesting that the provision of new and larger buildings is essential to agriculture and forestry. We would dispute this contention.

In addition to the essential business of food production, an increasing number of our farmers are engaged in high added value food processing and delivery, which is also an extremely profitable business and of growing local interest. This does *not*, however, necessitate large scale building. The Surrey Hills label is helpful in this regard, as is noted in the context of the policy. Silent Pool gin and sparkling wine, The Tillingbourne Trout Farm, the Kingfisher Watercress beds, the raising of beef, lamb, pork, and poultry in the Surrey Hills at Drydown Farm or Manor Farm; the Hog's Back brewery, fruit grown throughout the borough and many other businesses are of enormous significance to the borough and should be encouraged. It will be harder to cultivate a label advertising premium quality organic food from the North Downs if Guildford becomes known principally as a storage or warehousing area.

Economic growth is indeed needed by the country. Some of that growth is perhaps needed in Surrey, although we already produce a disproportionate share of the national wealth and are the most densely populated rural county. Many would argue that this is not an appropriate destination for economic pump-priming and that areas which have more need of employment, (for example in the Black Country, the North West, the North East or Wales) would be better recipients of public finance to encourage economic growth. We don't particularly want it; we don't particularly need it; and we are trying to cope with the organic growth we have, we certainly don't need to stimulate it further. The unelected and undemocratic M3LEP has a stated agenda, evidenced by its minutes (subsequently expurgated), of actively influencing government policy in relation to housebuilding; and this is perhaps because housebuilders sit on the Land and Property Group of the M3 LEP. This constitutes an unacceptable conflict of interest.

The ability to generate wealth is **not** related to the size or number of warehouses built. This is unintelligent and old thinking – wealth is not related to the size of storage space. The monitoring of sq m of B class floorspace completed in rural wards is **entirely** inappropriate.

The Key Evidence summary notes that the evidence base includes the Guildford Borough Rural Economic Strategy which is yet to be published and therefore (by definition) *cannot* have informed this policy or the decisions which have been taken in order to arrive at it. To determine a policy on the basis of a non-existent evidence base, which is only provided (or indeed drafted) post hoc, must be legally indefensible.

23 POLICY E6 LEISURE AND VISITOR EXPERIENCE

We object to Policy A6 as it stands. Tourism and visitors do not depend on new visitor attractions and facilities – and these may undermine the area. Overdevelopment is a risk especially in the countryside.

- We believe that the importance of a visitor attraction hub could be much better articulated. Guildford has great potential to become a “must see” destination for tourists and visitors. Surrounded by the natural beauty of the Surrey Hills, it is already distinguished as an historic county town. The historic part of the town should be exploited to the full creating a real sense of vibrancy and atmosphere. This should be linked to the attractions of the Museum, the Castle, the Wey and the historic High Street including its views of the Hogs Back. Guildford would be wise to model itself on other historic towns like Bath, Chester and York. The economic impact would create big advantages for both the leisure and the niche speciality retail sectors in the town. Given the local and wider catchment of the town Guildford should strive for high quality definition making it a great centre for people to live in and visit. It would be a great mistake if Guildford were to opt for large impersonal department stores and dull high street chain stores at the expense of exploiting its uniqueness and character which would afford greater benefits.
- Guildford the historic “Gateway to the Surrey Hills” has far more potential than Guildford just any other stereotypical centre found anywhere around London. What GBC needs to do is create a theme such as a new “Pilgrims Trail” similar to the Patriots trail in Boston USA with marked yellow footsteps leading from the station to the River and up through the historic heart of the town.

The importance of tourism and leisure within the borough is acknowledged by GBC, and thus far this policy is welcomed. Thus far, the principles underlying this policy are given measured and qualified support. However, the emphasis however on development in order to facilitate tourism seems fundamentally misguided, and, as in other areas of the plan, seems to regard both the planning function and local government as a whole as the marketing and sourcing department of the building and civil engineering industries. This is inappropriate and therefore this element merits objection on an overall basis.

It should be noted that Tourism is one of the major industries in the country. Visit Britain notes: “*Since 2010 tourism has been the fastest growing sector in the UK in employment terms, responsible for one-third of the net increase in UK jobs between 2010 and 2012.*

The report forecasts that the tourism economy will be worth around £127 billion this year (2013), equivalent to 9% of the UK’s GDP. It supports over 3.1 million jobs, that’s 9.6% of all jobs and 173,000 more than in 2010. The sector is predicted to grow at an annual rate of 3.8% through to 2025 - significantly faster than the overall UK economy (with a predicted annual rate of 3% per annum) and much faster than sectors such as manufacturing, construction and retail.”

In the context of the importance of the tourism sector, it is deeply shocking that there is so little care attached to this section of the local plan. The part of the local economy is likely to grow more quickly than any other sector of the economy, and the damage to the UK economy that could result from unrestricted promotion of housing estates and warehouses should be calculated before growth is seen as a motivating force for development.

This area of England is important, and it is visited by tourists and visitors, not primarily because of tourist centres nor even because of rural sites of significance such as Hatchlands Park, important though that National Trust sites may be.

The importance to the borough of the countryside qua countryside, embodying rural tourism, rural agriculture and its related impact on the local economy cannot be overstated. The contribution of the outstanding countryside in the borough (which is highly valued by walkers, cyclists and many others) has been disregarded.

In this part of England agriculture is prosperous and prospering; and the importance of the countryside to the country as a whole is enormous.

Set out below are extracts from the submission to the Issues and Options consultation by the Burrows Cross Area Residents' Association which indicates, just for the villages within the ward of Shere, some of the tourist sites which are of historic, cultural and tourist interest.

These are illustrative only, and many other areas within the borough have equivalent points of local and regional interest. This is indicative of the level of information that should be considered for all areas throughout the borough, and that greenfield and Green Belt sites should be avoided wherever possible on these grounds, quite apart from any other environmental factors. It indicates some of the tourist significance of this area. It should be noted that tourism relies heavily on the agricultural and rural qualities of the landscape in the area, not just to visit particular sites but for walking and cycling on a routine basis.

It should also be noted that activities such as Duke of Edinburgh walks rely heavily on the North Downs for schools in most of the South West quadrant of London. These schools would not send parties of teenagers through the countryside every weekend of spring and early summer if the sites were overdeveloped. Walks along the nationally important North Downs Way or Pilgrims' Way are of enormous popular importance to all sections of the community. These do not need "facilities" except the informal facilities of cafes, pubs and restaurants that exist within the villages.

Furthermore, it should be noted that the cycle trips that are of increasing national importance rely heavily on the Surrey countryside. The Olympic cycle route routed through the Surrey villages, through or past Ripley, Ockham, Clandon, Shere and Gomshall; subsequently followed by Ride Prudential, is regarded as the archetypal illustration of the English countryside at its best for an international audience.

Lack of development is in itself a key element of the attraction to tourists, and this should not be disregarded as a key element of the planning process, which should constrain inappropriate development as much as it should promote development which is socially and environmentally desirable (e.g. in the renovation of brownfield sites).

Appendix:

Extracts from BCARA submission to issues and options consultation as an illustration of the level of tourist activity and areas of interest in rural areas:

NPPF 132 notes an obligation to restrict development in the vicinity of heritage assets. It has already been noted that heritage assets are significant in the villages of Shere (Norman church (1190), mediaeval village buildings (The Old Forge, The Old Prison, Weaver's House, Wheelwright Cottage), many other listed buildings including the restaurant of Kinghams in a mediaeval building or The White Horse pub, filmed in The Holiday (tourism, local business)) and Gomshall (17th Mill, Tudor houses including the King John House, NT property and land at Netley House). The area also has bronze age hill forts, a Roman temple, High House Shere (1630, Grade 2 listed).

This brief history of Shere (incorporated in full by reference) gives an indication of its historical importance:<http://www.sheredelight.com/history.html>

This website also gives an indication of the importance of the undamaged nature of the villages and the surroundings to an important local industry, which is filming.

See <http://www.sheredelight.com/films.html>. It should be noted that NPPF enjoins local authorities to consider the impact of development on any existing business, and that if this is adverse, then they should not give permission. The impact on the film industry of any development in this area should not be underrated. This would have a significantly negative impact on the local economy of the borough as a whole.

Gomshall's history is summarised usefully on the Wikipedia site: (incorporated by reference): <http://en.wikipedia.org/wiki/Gomshall>. This notes that the Manor of Gumesele was a Saxon feudal landholding; that Gomshall appears in Domesday Book of 1086 as Gomeselle. It was held by William.

In 1154, Henry II of England divided the Manor of Gumesele into three: West Gomshall (granted to an abbey in Netley so known as Netley after 1240), East Gomshall (granted to an Abbey in Tower Hill in 1376 so now known as Tower Hill) and Somersbury (now Gomshall). This demonstrates that the current boundaries of the village are recognizable from the Domesday book, and that this is in itself of cultural importance. To develop on land adjacent to these boundaries would be wholly inappropriate since that would be to alter the village boundaries that have lasted on a very long term basis as permanent and established features of the landscape, as required by NPPF.

Local industries developed based on the plentiful and constant water supply of the River Tillingbourne. Leather tanning is a historic industry, now gone. Gomshall Mill was the corn mill. Some other businesses based on the Tillingbourne survive, and would be damaged by over development. These include watercress growing (at the Kingfisher Watercress Beds in Abinger) and trout farming (between Abinger and Gomshall, in the area bounded by this study – for both of which clean water is a particular essential ingredient. Damage the water supply and you will kill the business). In addition to these food suppliers, many of the local fields are farmed organically and contribute to the Surrey Hills organic food brands (beef, lamb, pork). The importance of the agricultural industry should not be ignored; it is not reasonable to perceive that building a house is "Growth" or "development" while destroying a farm or an agricultural business (which of course economically is negative growth). Those farms have a hugely positive tourist impact too.

The AA has prepared a walking guide of historical sites associated with Romans and Celts in this parish. <http://www.theaa.com/walks/with-the-romans-and-celts-at-farley-421068>
The area of Abinger Roughs and Netley Park is listed on the NT website; this link is incorporated into this section by reference:<http://www.nationaltrust.org.uk/abinger->

roughs-and-netley-park/how-to-get-here/?findPlace=Abinger%20Roughs%20and%20Netley%20Park&type=&view=map. The guide to the locality from the NT (see website link, incorporated by reference) is relevant in the context of local wildlife, which are abundant throughout this parish not just in the area identified by the NT. <http://www.nationaltrust.org.uk/cs/Satellite?blobcol=urldata&blobheader=application%2Fpdf&blobkey=id&blobtable=MungoBlobs&blobwhere=1349108282364&ssbinary=true> NPPF 126 notes that local authorities have a duty to recognise that heritage assets (and their setting) are an irreplaceable resource and that they have a duty to conserve them. NPPF 123 notes that planning decisions should protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason. In this locality the most prevalent noise is that of birdsong. It is not appropriate to consider this as a possible area for development. NPPF 118 notes that planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats.

The NT guide to Netley Park and the Abinger Roughs notes in the context of local wildlife: "Lots of birds can be seen and heard on the Roughs. Near the rhododendrons is a good spot - look out for: goldcrests, woodpeckers, wrens, treecreepers, song thrushes, chaffinches and dunnocks." Some of these species, and also the other species noted by the NT such as noctule bats, are of conservation importance and they should not be disturbed. (Source: <http://www.nationaltrust.org.uk/abinger-roughs-and-netley-park/wildlife/>).

NPPF 115 notes that "*Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty*". It is not acceptable to destroy any part of this area, protected over the last two millennia and substantively unchanged, in order to make a short term developmental profit even for a tourism related project. It further comments that the conservation of wildlife and cultural heritage are important considerations in all these areas. NPPF 116 notes that planning permission should be refused in these areas except in exceptional circumstances. This should be incorporated into the local plan.

Overriding force should be given to the Green Belt provisions of NPPF 88 and 89 which generally notes that substantial weight should be given to any harm to the Green Belt and that the construction of new buildings is generally inappropriate.

GBC should be reminded that the AONB has status equivalent to that of a National Park. Interestingly in National Parks, the National Park authority has overall responsibility for planning policy. For the South Downs National Park, the guidance is of relevance http://www.southdowns.gov.uk/_data/assets/pdf_file/0013/123232/Agenda_Item_8_Appendix_1_20101203.pdf. This states:

"National Parks have two statutory purposes which must be taken into account when considering planning proposals that could have an impact upon a National Park.

To conserve and enhance their natural beauty, wildlife and cultural heritage

To promote opportunities for the public understanding and enjoyment of these special qualities.

If there is a conflict between these two policies then the first must take precedence."

Other guidance is worth noting. The National Parks and Access to the Countryside Act 1949 legislated for the designation of AONBs and National Parks. Their purpose was to be similar - to conserve and enhance natural beauty. The Countryside Commission defined the purpose of AONB designation in a statement of 1991.

Purpose of AONB Designation

- "...Is primarily to conserve and enhance natural beauty.
- In pursuing the primary purpose of designation, account should be taken of the needs of agriculture, forestry, and other rural industries and of the economic and social needs of local

communities. Particular regard should be paid to promoting sustainable forms of social and economic development that in themselves conserve and enhance the environment.

- *Recreation is not an objective of designation but the demand for recreation should be met so far as this is consistent with the conservation of natural beauty and the needs of agriculture, forestry and other uses."*

Areas of Outstanding Natural Beauty: A policy statement (Countryside Commission, CCP 356, 1991), p5

AONBs and National Parks are recognised in England to be on a par legally because of their nationally important landscapes. The National Planning Policy Framework confirms that AONBs are equivalent to National Parks in terms of their landscape quality, scenic beauty and their planning status.

The statutory duty enjoined upon GBC is not to seek to develop but to protect this area – “*to conserve and enhance natural beauty*”. GBC appears to have objective seeking growth which is in conflict with the requirements to protect. This is already covered by NPPF in relation to Green Belt status, which is in itself glossed by ministerial guidance, as previously noted (Eric Pickles, Brandon Lewis and others).

Development within the AONB of any form is likely to be damaging. In addition to the overriding restriction on such development under NPPF, the following statement referred to by Natural England is of significance:

"The United Nations Environment Programme (UNEP) has recently drawn attention to studies finding that although developed land covers only a small proportion of North America's land base, it has a large impact on ecosystem services. For example, roads occupy just 1% of the US land area, but they alter the ecological structures and functions of about 22% or more of the land. In US regions with rapid 'exurban' (or extensive residential) growth, species richness and endemism diminish as urban cover increases, threatening biodiversity. The fragmentation of natural habitat threatens more than 500 endangered US wildlife species with extinction. It also provides new entry points for invasive species already introduced through other pathways".

13. Source: United Nations Environment Programme, Global Environment Outlook GE04 – environment for development , 2007,

p.259 at Box 6.30, itself quoted by Natural England.

In other words, seeking growth of any kind within the AONB is inherently undesirable and in conflict with the overriding principles of biodiversity, and therefore sustainability.

24 POLICY E7 TOWN CENTRE

We object to this policy. There should be much more residential use of the town centre. There is limited need for further retail, which will disadvantage existing retailers as well as using valuable land inefficiently. There is an urgent need for a brownfield register and to focus on brownfield redevelopment

before considering development outside the existing urban area. CIL strategy must promote brownfield redevelopment.

The government committed to legislating for a ‘brownfield register’ of ‘land suitable for housing in the Queen’s Speech 2015 and the 73 councils piloting the brownfield register were announced in March, 2016. Section 151 of the Act permits regulations requiring LPAs to keep a register of particular kinds of land, of which the brownfield register will be one. There is no reference to a brownfield policy within the policy for Guildford Town Centre, which is a major flaw.

Retail

Policy E7 is ill-informed. The evidence base fails to assess the capacity of the existing town centre to accommodate appropriate new development objectively. Paragraph 161 of the NPPF requires the LPA to assess the real quantitative and qualitative needs for economic activity including retail and leisure development, and we consider that this requirement has not been met.

Policy E7 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 can support expansion of 45,000 sq m of additional retail space at North Street. There is a lack of demand for retail units in the Town Centre particularly large units.

There is falling demand for retail space in Guildford and town centres throughout the country (as evidenced by independent research and the reality of empty shops in many high streets (including Guildford) and the accelerating competition from internet shopping – see CEBR studies).

The North Street scheme has repeatedly failed in various redevelopment proposals over the last ten years. This is evidence of a lack of demand, such that the original planning permission for a large retail scheme became time expired. A number of major developers have studied the proposals in detail and then withdrawn from negotiations because the proposals are not economically viable.

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 the historic visitor attractions supported by restaurants.

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 7,000 sq m with the rear and upper floors providing an additional 500 to 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.

The findings of the Guildford Retail and Leisure Study 25 September 2015 are very pessimistic about retail trends. Carter Jonas's recent study reports a bad time for retail. GBC's own evidence base demonstrates that there is limited demand for additional retail space. The bullet points below are direct quotes from the report:

- Para 3.3 Retail Trends "Town centres, once the principle focus for retail and leisure are now increasingly under threat"
- Para 3.4 Retail Expenditure "disposable income and retailers' margins are being squeezed further"
- Para 3.5 "there has been limited growth in retail (convenience and comparison goods) expenditure per head since 2008"
- Para 3.6 "the retail sector remains fragile and analysts forecast that some operators and centres will continue to struggle over the short to medium term"
- Para 3.8 "completed new shopping centre floor space in the UK is currently at its lowest level since the 1990s"
- Para 3.11 Internet Shopping "New forms of retailing have also emerged in recent years and are becoming established as significant alternatives to more traditional 'bricks and mortar' shopping facilities. Over the last 5 years, online sales have increased by 222%"

Appendix 6 of the Retail Study indicates inaccurate demand data

- Para 5.29 "The latest CoStar Report recorded 64 requirements for Guildford from January 2013 to August 2014; representing a total maximum floor space requirement of 62,208m² gross (see Appendix 6)."
- This looks in the main unconvincing with brands such as Joules Clothing; Fossil; Comptoir des Cotonniers; Moshulu; Rituals; Princesse tam.tam; Cycle Surgery; Majestic Wine; Game Stores Group Ltd; Iceland. But if we look closely at Appendix 6 it is an amalgam of old unconvincing national high street requirements some of which do not even include Guildford as a destination and most is hardly high quality comparison retail. There are also no "big" requirements in terms of space. Where are the big stores?
- GH Pressley & Sons – Watches and Silver- Requirement "They are seeking a flagship diamond store in central London. Target locations include Mayfair, St James, Kensington and Knightsbridge. Brands will include Hans D Krieger and Marco Bicego." This does not sound like Guildford

- Oxygen Red Ltd – Ladieswear- Requirement “Oxygen Red is looking to acquire temporary stores in Shopping Centre locations within the M25” Guildford is well outside the M25
- Game Stores Group Ltd have apparently a requirement for a store in Guildford dated 2012 but the company entered administration on 26 March 2012, and 277 of Game's 609 UK stores were closed immediately, resulting in 2,104 job losses. Are they really looking?
- The data relating to retail demand does not appear reliable. The 62,800 sq m does not translate to real demand for an expansion of 500,000 sq ft. If proper due diligence was applied perhaps 10% of this Carter Jonas requirement would survive

Brownfield redevelopment

We must make full use of our urban brownfield before we consider building in the Green Belt or countryside. Paragraph 17 of the NPPF states that to “encourage the effective use of land by reusing land that has been previously developed (brownfield land)” is a core planning principle. 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.

In response to the detailed objections received in the Regulation 18 process of the 2014 Local Plan and also in accordance with government policy a Guildford brownfield land register should be urgently compiled showing address, ownership, occupier, current use and detailed planning brief.

- GBC needs to accelerate residential redevelopment at Woodbridge Meadows, Walnut Tree Close and the Station within the next 1 to 5 years
- GBC needs to examine the residential development opportunity of the 25.7 acres of car parks in GBC ownership
- A brownfield-first policy should underline all planning decisions and the default for non-brownfield land should be rejection
- Failure to promote brownfield-first is unsustainable and is contrary both to the policies of the Metropolitan Green Belt (still in force) and NPPF paragraph 80 and 84.

Our recommendation is for a new Brownfield Policy for the town centre:

“We are committed to a brownfield-first initiative. All applications on previously developed land within the urban settlement area will be given fast-track priority. Development of urban brownfield land will be prioritised for residential and employment purposes to satisfy the needs of local people.

In parallel a zero-CIL incentive should be given for all residential development on urban brownfield land in order to meet the NPPF requirement for urban regeneration. Brownfield sites in the urban area should be identified as soon as possible. The register should be public, with full details of ownership. All brownfield sites owned by Guildford Borough Council, Surrey County Council or other government entities should be considered as available development land within the first 5 years of the plan.”

Residential

We do not believe that the target of 1,172 homes in the town centre takes account of the need and demand for urban housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town. This will help to sustain the retail core. The Town Centre policy needs to maximise the potential for residential development on brownfield. It must 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 has recently been adopted by GBC. We consider that the Town Centre has the capacity for the higher of at least 50% of the total or at least 5,000 homes. At present, the plan is to impose 70% of new residential development on greenfield and Green Belt land.

25 POLICY E8 DISTRICT CENTRES

We object to policy E8 District centres

We object to the proposal that sites “on the edge” of District Centres should be considered for retail developments. This is another Trojan horse policy, allowing retail hubs to be vastly expanded in order to smooth the way for vast new housing estates outside in the countryside (e.g. to meet the “everyday shopping and service needs” of the roughly 1,500 people living in the 600 new homes planned for the Horsleys).

This is a case of back-to-front priorities. Expanded local retail hubs are being proposed in order to justify more housebuilding in the villages, and in a forlorn attempt to mitigate the serious traffic and infrastructure problems this will bring. The Council have no business preparing the way for new supermarkets in the Green Belt. Rural retail capacity should be left to local demand.

The policy proposes not a single measure to support existing rural shops and services that are the lifeblood of village communities, e.g. using business rates and other levers at the Council’s disposal.

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26 POLICY E9

We object to Policy E9 Local centres

We object (for the reasons given under Policy E8 above) to the proposal for retail development adjacent to the 6 rural centres, and sites on the edge of designated centres. This is creeping urbanisation, damaging to the Green Belt and to Guildford town revival as a thriving urban hub. It will contribute to local urban decay and depopulation, just as expansion of the suburbs did to mid-20th century London.

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27 POLICY D1 MAKING BETTER PLACES

We object to Policy D1 Making better places

We object to the absence of any reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force.

The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design? Should it not result in better-designed buildings?

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28 POLICY D2 SUSTAINABLE DESIGN

We object to Policy D2 Sustainable design, construction and energy

Sustainability should be an overarching ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, “like a golden thread”. It should be set out clearly in Policy S1, not buried away as a minor detail in Policy D2.

This policy amounts to “greenwashing”, expounding aspirational environmental targets while ignoring the plan to build dormitory towns across the Green Belt that are environmentally and socially unsustainable. These settlements will bring vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and more greenhouse gas emissions, noise and light pollution. This policy should not be just about saving energy but about preserving the borough’s stock of natural capital, especially the countryside, from futile attempts to rig the housing market.

This policy’s emphasis on Combined Cooling Heating and Power and communal heating networks is meaningless, since no such networks are available locally.

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29 POLICY D3 HISTORIC ENVIRONMENT

We object to policy D3 Historic Environment

This policy clashes with the strongly pro-development agenda of the rest of the plan and fails to address the contradiction. History is unamenable to improvement, so the policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to “support development” that might “enhance” heritage assets leaves wide scope for abuse in the form of destructive commercialisation and financial leveraging of relevant sites.

This policy is based on the false premise that Guildford’s heritage is inherently in decay. This is a developer’s charter – a short step away from the idea that the historic environment needs to pay its way to be preserved. The Council’s aggressive reviews of Guildford Museum and the Electric Theatre support this interpretation. Whatever the “reasoned justification”, the actual policy wording in the blue box leaves too many loopholes.

Development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

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30 POLICY D4 DEVELOPMENT IN URBAN AREAS

We object to policy D4 Development in urban areas and inset villages

Summary

There are effectively two separate parts to this policy, both are flawed, and in the case on insetting, fatally flawed. In the case of urban development there are numerous flaws, including:

- The plan envisages a large expansion of the traditional “bricks and mortar” retail sector, but this is a sector in long term decline.
- The plan envisages that 40% of homes built will be affordable, but this does not provide any accommodation for low paid workers, for example, those on the minimum wage, who cannot afford to buy “affordable” homes, nor can they pay the so-called “affordable” rent. There is a great need for an expansion in social housing, especially in urban areas, where there is a greater concentration of low paid workers such as those employed in the retail, warehousing and distribution sectors.
- The number of homes planned in the urban area is too low – there is a need for regeneration in some areas, but this is ignored and instead the plan concentrates on building homes on green field sites, which does not meet the needs for housing within the town, especially with the centre. This is not a sustainable policy as building outside the town has a disproportionate effect on road traffic.

In the case of insetting, the policy is fatally flawed, for two separate reasons.

- Firstly, it is based on an erroneous assumption. GBC justify the policy (in para 4.5.50) by suggesting, without any supporting data, that development in villages washed over by the green belt is at a lower rate than within Guildford town. This is not the case, and statistics from the ONS censuses of 2001 and 2011 show that this assumption is incorrect. These statistics show that the growth rate in housing was higher in, for example, Effingham, a village washed over by the green belt than Merrow, a suburb of Guildford which is not washed over by the green belt. In fact, the rate of increase in housing stock in Effingham was faster than the average for the borough.
- Insetting has been based on the assumptions set out in the Green Belt and Countryside Study, but this is not referred to as part of the Evidence base. The analysis in this document was flawed to the extent that it is valueless. It has serious flaws in its methodology, includes subjective judgements, and thus its conclusions are flawed. These flaws are so serious that it should be removed from the evidence base that supports the Local Plan. However, removing the reference but retaining the decision process means that the decisions are based on flawed assumptions.

Urban development

There is a fundamental flaw in the draft Local Plan, in that there are not enough dwellings planned in urban areas, in particular, Guildford town centre. This is where the demand for affordable homes is most acute, a fact which is recognised in much of the draft Local Plan. Yet the plan then envisages that most dwellings will be built outside the urban area, so there is no continuity in the plan – if the demand for affordable homes is most acute within the town, then is where these dwellings should be built. There are sites available, for example, various sites in Woodbridge Meadows, Walnut Tree Close (including the area around the station) and North Street. Yet the focus in these areas is to provide a very limited number of dwellings, with the emphasis on additional retail space and more commercial premises. Given the profound changes in traditional retail, this is not a sustainable policy. There have been many examples of bankruptcies amongst traditional retailers, the most recent examples being BHS and Austin Reed, and previously Woolworths, Comet, etc. The British Retail Consortium forecast that by 2020 up to one third of those now employed in traditional retail could lose their jobs, due to a combination of the move to the internet and higher costs, from business rates and increases in the minimum wage. Recent figures show that online sales are still growing quickly, with more than 13% of total retail sales now made over the internet. Nor does an expansion in traditional retail chime with the objective of attracting highly paid jobs to the area – the majority of jobs in retail are low paid, with zero hours contracts and usually a pay rate based on the minimum wage. So any expansion in traditional bricks and mortar retail would create a greater demand for affordable and social housing – exactly the reverse of what is needed.

Even the major grocery retail chains have been affected by changes in retail habits – Tesco, Sainsburys, Morrisons, etc are closing some stores, with no major large stores planned. Banks and other financial institutions are still closing some branches, so changes in town centres still have some way to go – but none of these changes are recognised in the draft Local Plan, which envisages no limit to traditional retail.

There is another reason why the retail sector is unlikely to exhibit long term growth, and this is consumer debt, which has reached a level that the Bank of England have said could contribute to economic stability. This is likely to have a greater destabilising effect in the event of an economic downturn – and there will certainly be at least two of these during the life of the Local Plan. Retail spending simply cannot be maintained indefinitely at its current rate, and to plan for a large increase in consumer spending is irresponsible. So there has to be a reappraisal of the urban development plans, with more homes provided in urban areas, in particular in the centre of Guildford, before there is any consideration of building outside the urban area. These are not separate policies to be considered separately, but hang together as part of a holistic plan. As the council own many sites in the centre, these could be made available for development within the first 5 years of the plan, with mixed housing on these sites, including new social housing, which is sorely needed. Affordable housing is simply not affordable to anyone on the minimum wage, there is a need for a considerable expansion of social housing, a need that is not adequately recognised in the draft Local Plan.

In the detail of Policy D4, it suggests that in urban areas and inset villages planning permission will be granted provided that a proposed development:

- “Ensures that the layout, scale, form, massing, height of buildings and structures, and materials relate to the site context and its surroundings;”

There are several other criteria listed and the Policy then goes on to elaborate criteria specific to inset villages, as follows:

“In addition to the above, proposals for new development within inset village areas will have particular regard to:

- *The distinctive settlement pattern of the village and the important relationship between the built development and the surrounding landscape;*

- *Important views of the village from the surrounding landscape;*
- *Views within the village of local landmarks.”*

There are numerous development sites proposed that mean that the first criterion cannot be met, as the developments proposed do not relate to the scale, form or massing of the site surroundings. For example, in West Horsley and East Horsley, there are number of sites where this does not apply. It is proposed that a total of 3.6 km² should be removed from the green belt, with a total of 533 houses proposed on sites in East and West Horsley on a total of 29.1 ha, an average density of 18 dwellings/ha. These proposed developments are not in scale or proportion to the existing villages, and the housing density is considerably higher than existing housing density. Effectively, if these developments were to proceed, East and West Horsley would merge and become a large urban area in the green belt, totally different in character to the existing villages, with the existing settlement pattern completely lost. Similar considerations apply to other proposed development sites, such as Flexford and Normandy. In this case, 1.3 km² would be removed from the green belt and a total of 1100 dwellings proposed on 67 ha, with an average density of 16.4 dwellings/ha. Again, the scale and form would overwhelm existing hamlets and villages, merging these to form another urban area in the heart of the green belt, with no consideration of the views of the settlements from the surrounding countryside, much of which has been given AONB status.

Thus the words of the policy statement D4 do not match the proposals contained in the draft local plan.

The “Reasoned Justification” for the policy consists of five paragraphs, 4.5.48 to 4.5.52. Of these, 4.5.48 and 4.5.49, 4.5.51 and 4.5.52 are not justifications for the policy, they are simply statements or further information. Paragraph 4.5.50 is the only attempted justification for this policy, but in fact this applies only to insetting. Paragraph 4.5.50 is factually wrong and so the justification for this policy does not bear close examination. Parts of this paragraph are taken in turn below, to show the inaccuracies this paragraph contains.

“Historically, development has been focused in the urban areas of Guildford, and Ash and Tongham only. Development in the villages has been very limited due to the Green Belt designation which previously washed over all but one of the villages.”

This depends on how development is measured. In terms of raw numbers, this may be true, but this would ignore the fact that urban area of Guildford town contains much of the housing in the borough. Taking the increase in housing stock between the censuses of 2001 and 2011 in a specific wards reveals a much more complex picture. The village and ward of Effingham, for example, had a higher rate of adding dwellings than the average for the borough and for at least some of the Guildford urban wards. Using census data collected by the ONS, between 2001 and 2011, the number of dwellings in Effingham increased by 6.6%, whereas for the borough as a whole it increased by 5.0%. Over the same period in Merrow, a ward within the urban area of Guildford, the number of dwellings increased by only 1.2%, whilst in Normandy ward the increase was 2.6%. This analysis has not been exhaustive, but it is sufficient to show that the opening statement in paragraph 4.5.47 is incorrect, and that in some cases, proportionally, considerably more development has occurred in green belt villages. It must be incumbent on GBC to assess the facts before making false statements such as this. Opinions are not facts. ONS statistics are open to all.

In the first three months of 2016, planning applications for 11 additional dwellings in Effingham have been made, in a village of approximately 525 dwellings. One of these applications has been reduced from 6 to 4 dwellings, whilst the other 5 have been approved. This shows clearly that development within villages washed over by the green belt can occur, and that organic growth is possible. There is no necessity for insetting.

"Fifteen villages are now inset from the Green Belt meaning that development is no longer, by definition, considered inappropriate".

Guildford's Green Belt boundaries were established in the Guildford Borough Local Plan 1987, so are well established. There has not been any justification for the extensive green belt review that accompanies the insetting of villages, or for the removal of these villages from the green belt. According to the NPPF, paragraph 83, green belt boundary changes should be made only in exceptional circumstances, as follows

"Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period."

No exceptional circumstances have been demonstrated, with none given as justification in Policy D4 for the policy of insetting. Proposed green belt boundary changes are on a very large scale, as it is proposed to remove more than 6% of the existing area designated as green belt, and to create new green belt boundaries extending to more than 105 km. This is not a simple revision to the green belt, and a demonstration of exceptional circumstances is required for each change. This has not been done, not for a single proposed change.

Although Guildford Borough Council are in the process of producing a new Local Plan, this in itself is not enough to change Green Belt boundaries; the requirement to demonstrate exceptional circumstances still applies. According to a High Court judgement, Gallagher vs Solihull, issued March 30th, 2014, Case No. CO/17668/2013, there is still a requirement to prove exceptional circumstances – quotations below are from paragraph 125 of this judgement:

"However, it is not arguable that the mere process of preparing a new local plan could itself be regarded as an exceptional circumstance justifying an alteration to a Green Belt boundary. National guidance has always dealt with revisions of the Green Belt in the context of reviews of local plans..... and has always required "exceptional circumstances" to justify a revision. The NPPF makes no change to this."

"Exceptional circumstances are required for any revision of the boundary, whether the proposal is to extend or diminish the Green Belt."

Whilst each case is fact-sensitive and the question of whether circumstances are exceptional for these purposes requires an exercise of planning judgment, what is capable of amounting to exceptional circumstances is a matter of law, and a plan-maker may err in law if he fails to adopt a lawful approach to exceptional circumstances. Once a Green Belt has been established and approved, it requires more than general planning concepts to justify an alteration.

Each and every proposed change to the green belt boundary requires that exceptional circumstances be demonstrated, otherwise the changes are not lawful. This has not been done by GBC, not for any proposed change.

From paragraph 130 of this judgement

"In other words, something must have occurred subsequent to the definition of the Green Belt boundary that justifies a change. The fact that, after the definition of the Green Belt boundary, the local authority or an inspector may form a different view on where the boundary should lie, however cogent that view on planning grounds, that cannot of itself constitute an exceptional circumstance which necessitates and therefore justifies a change."

"....That, in his judgment, may now be so: but that falls very far short of the stringent test for exceptional circumstances that any revision of the Green Belt boundary must satisfy. There is nothing in this case that suggests that any of the assumptions upon which the

Green Belt boundary was set has proved unfounded, nor has anything occurred since the Green Belt boundary was set that might justify the redefinition of the boundary.”

No changes that would warrant an alteration to green belt boundaries have been demonstrated by GBC, their so called “sensitivity analysis” is shallow and subjective, and changes that may have occurred since the boundary was established was discussed.

The changes proposed do not meet the standards set in this judgement. Instead, GBC maintain that it is housing need that creates blanket exceptional circumstances for changes proposed to the green belt. However, this is not the case. Following a meeting with local councillors and MPs in early 2014, Nick Boles wrote to Anne Milton MP to clarify the issue of exceptional circumstances and in this letter said:

“The written Ministerial Statement of 1 July 2013 set out the Government’s concern that some recent planning decisions have not accorded the Green Belt the level of protection that was the explicit policy intent of Ministers. It made clear that the single issue of unmet need – whether for conventional housing or for travellers sites – is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt.”

These quotations show that the insetting process has considerable hurdles to overcome, including as it does the revision to Green Belt boundaries that accompanies insetting. Thus the most important questions are – did the flawed Pegasus “Guildford Borough Green belt and Countryside Study” show unequivocally that villages to be inset are not open villages, making no or a minimal contribution to the openness of the Green Belt; and that there were exceptional circumstances (other than unmet housing need) that justify a change to the Green Belt, creating a new boundary around all these villages – more than 105 km of new boundary? The Pegasus study did not do this, and this was just one of its many flaws (cf Annexe)

As shown above, development has occurred within villages, and the NPPF made it easier for additional development to take place within the green belt, via the provisions of paragraph 89, which specifically makes it easier for limited infill to occur and on a larger scale, for affordable housing to be built within villages washed over by the green belt.

These provisions came into effect in 2012, when the NPPF was adopted and so the rate of increase in housing within villages is very likely to increase beyond that observed in the period between the 2001 and 2011 censuses.

It is clear from the most recent figures for planning applications to GBC in 2016 in Effingham that the pace of development within villages is changing, even with continued green belt protection. There is no requirement for insetting villages within the green belt, and the desire to increase development within the villages is not an adequate basis for insetting.

The final part of paragraph 4.5.47 is

“In accordance with national policy, the important character of these inset villages should instead be protected using other development management policies”.

This is not national policy, national planning policy is provided by the NPPF, and paragraph 86 of the NPPF is the relevant paragraph, which reads

“If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt.”

There is thus no national policy that requires insetting. Instead, a judgement should be made for each village based on its contribution to the openness of the green belt. In fact, many of the villages proposed for insetting exhibit an open pattern of development, and so make an important contribution to the openness of the green belt, for example, Effingham. This has not been considered, other than in the flawed Pegasus report, and

the examination of their approach reveals how this analysis was flawed. No further consideration has been given by GBC, and so GBC's policy of wholesale insetting does not accord with national policy, as claimed.

In itself, there are many issues with insetting, and these include:

- According to the previous draft of the Local Plan, subject to the Regulation 18 consultation during summer 2014, insetting is based largely on the findings of the Pegasus study, "Guildford Borough Green Belt and Countryside Study. This report was very poor and various parts of the study criticised by many, including some borough councillors. It is perverse to continue with any recommendations of this study. In particular, a detailed review of this report for Effingham village showed that it was inaccurate and subjective.
- The settlement hierarchy was also subject to a detailed review and again this showed that scoring methods used were inaccurate and subjective.
- Boundary changes are arbitrary, without an adequate detailed survey. There are no checks and balances to this, even though the positioning of the line can change the price of an acre of land from about £15,000 to over £1 million. There is no process to it, simply someone using a computer and a mouse – literally a mouse click can turn some land owners into millionaires. In some cases, the proposed boundary divides semi-detached houses, so that one is still inside the green belt and the other outside. In other cases, the boundary divides gardens, so that part of a garden is in, part out of the green belt. Due care and attention has not been given to producing proposed boundaries.
- In many cases, boundaries proposed do not comply with the requirements of the NPPF, which is given in the NPPF, paragraph 85, final bullet point, which states "*define boundaries clearly, using physical features that are readily recognisable and likely to be permanent*".

Given this NPPF definition, treelines, hedgerows, woodlands, etc should not be considered as potential Green Belt boundaries. In fact, in some cases proposed boundaries cross open fields, with no discernible features whatsoever. These are entirely inappropriate as a green belt boundary.

- It should also be noted that GBC implicitly recognise that insetting is likely to lead to more development within villages on sites that are not identified in the draft Local Plan. But there is no recognition of this in the housing target. As is noted, insetting would mean that the rate of windfall development would increase, but GBC have not provided a proper analysis of windfall development (such as that provided by Mole Valley District Council) and they have failed to recognise a higher rate of windfall development in showing how the housing target will be met – even though, via Policy D4, they are planning for it. Windfalls should be deducted from the housing target, and the need for additional sites would thus be substantially reduced. Windfall development should be properly assessed and identified within the housing target, with an appropriate increase in the rate of windfalls in any villages that are inset.

31 THE BROWNFIELD OPPORTUNITY

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** 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.

In response to the detailed objections received in the Regulation 18 process of the 2014 Local Plan and also in accordance with government policy a Guildford brownfield land register should be urgently compiled showing address, ownership, occupier, current use and detailed planning brief

A head of brownfield should be appointed at GBC with a clear briefing to deliver brownfield targets of housing and employment space

GBC needs to accelerate the residential redevelopment at Woodbridge Meadows, Walnut Tree Close and the Station within the next 5 years

GBC needs to examine the residential development opportunity of the 25.7 acres of car parks in GBC ownership

We do not consider that the target of 1,172 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.

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 has recently been adopted by GBC. The reality is that the Town Centre has the capacity for at least 5,000 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

Annexe in relation to Green Belt Study:

**Critique Update: Revisions to Green Belt and Countryside Study
Pegasus Study: Vol IV (dated 17/04/14)**

Changes to this volume (Volume IV, which deals with insetting of villages) were made because of earlier criticisms of the study, particularly with regard to Effingham. Changes were summarised as follows:

- “Re-consideration of how woodland / tree belts etc impact upon openness of the villages in Green Belt terms;
- Reference has been removed to the specific development footprint calculations, due to the complication previously generated in the interpretation of such data; and
- Re-consideration of the appropriateness of insetting Effingham, due to part of the settlement lying in adjoining authorities.”

In this revised version, a three stage approach was still used and the stages were given as:

“Stage 1: Assessing the degree of openness within each village through analysis of urban form, density and the extent of developed land;

Stage 2: Assessing the surroundings of, and potential new Green Belt boundaries at each village within Guildford Borough; and

Stage 3: Assessing the suitability of each village for insetting within the Green Belt and defining potential Green Belt boundaries.”

There is a very slight change to the wording of Stage 2, but no change of any substance to these 3 stages between the original and the revised version. However, in this new version the only reference to the previous method used in stage 1 was to justify the removal of

“the specific development footprint calculations, due to the complication previously generated in the interpretation of such data.”

The only complication was created by Pegasus using the data they generated in a bizarre way. As the previous critique showed Pegasus was interpreting their data incorrectly, so they have simply dropped any reference to it. However, this was at least an attempt to show objectivity in their methodology. This means that the entire revised process became subjective and opaque. As this is such a controversial and important topic – the removal of villages from the green belt - this type of methodology is simply not acceptable. The data that was previously generated pointed towards different conclusions from the conclusions drawn by Pegasus – and this was probably the real reason for the data being excluded in a revised report.

A fair and robust methodology would ensure that anyone else performing the same task would get the same or very similar results, and this is best achieved by using objective methods that are visible and transparent. However, if different **independent** groups were set the same assignment using the methodology employed by Pegasus, because of the

subjective nature of the tests, it is highly unlikely that the same conclusions would be reached. For an undertaking of such importance, the methodology used was entirely inappropriate and so the results from this study are unacceptable. It is notable that although the methodology changed, the outcomes were exactly the same, and this gives rise to the suspicion that results were predetermined. Instead of changing the method used in Stage 1 so that it became entirely subjective it would have been much better to tweak the methodology behind the data that was generated, to ensure it was objective and robust, and then to use data produced to provide an appropriate categorisation of villages, using results impartially. This they did not do, as it would have shown some of the villages being considered should not be removed from the green belt.

Although Pegasus claimed the methodology was changed, previous results have not changed – in other words, their conclusions have not changed. Consequently, the criticism of the methodology previously used still stands. Methodology used in Stages 2 and 3 has not changed and the previous critique is still valid for these stages.

The “new” methodology for Stage 1 in this later issue of Volume IV is discussed below.

Stage 1 Assessing the degree of openness within each village through analysis of village form, density and extent of existing developed land

The map used to illustrate this is exactly the same as that previously produced, with the same areas marked out, so it is not reproduced here – it is in the earlier critique. In this stage Pegasus use (as before) the concept of “perceived” village area, to justify the inclusion in the “perceived” village area of housing that is in Mole Valley – but they have not included any open areas such as Rolls Farm to be within the “perceived” village area. In fact, their concept of perceived village area is one that would be created only by viewing the area from space, or using aerial maps without boundary markings, with a determination to include as many buildings and as little open farmland as possible. On the ground, the boundary between Guildford Borough and Mole Valley is clearly marked, along the A246. So “perceived village area” is clearly a very subjective concept.

In this revised report, Pegasus have attempted to justify their sub division of areas into high, medium, low housing densities, as well as open areas, and their definitions are given below, with relevant paragraph numbers:

“13.13 Through site survey, aerial imagery and detailed OS base mapping at 1:5000 scale, areas of high, medium and low development density were identified within the village area. Such categorisation assumes development associated with a village, rather than other areas, so for example, high density areas identified would not be classed as high density within a town or city environment. The areas were defined as follows:

- *High Development Density – generally includes areas of flats, terrace, detached, semi-detached or singular buildings within densely distributed clusters with enclosed street frontages, small scale garden plots enclosed by fencelines, hedgerows and other buildings. Built development forms the dominant characteristic;*
- *Medium Development Density – generally includes areas of detached, semi-detached or singular buildings within closely distributed clusters within medium scale garden plots, small holdings, open spaces or small fields. Built development is the prevalent characteristic interspersed with visible open areas; and*
- *Low Development Density – generally includes singular detached buildings that are sparsely distributed within large garden plots, country estates or open farmland. Open areas form the dominant characteristic interspersed with infrequent buildings.*

13.14 Once areas of high, medium and low development density had been mapped, detailed comments regarding village form, density and openness were identified and annotated on the Stage 1 assessment map using a 1A, 1B, 1C, etc prefix."

Pegasus persisted in not providing a numerical guide to housing density, which would be a normal approach when attempting to classify densities. This means they can classify areas in any way they see fit, without regard to actual densities. They have deliberately chosen not to use an objective approach, which would be numerical. This is evidence for an approach with a predetermined outcome – Pegasus avoided using numerical data even when it is a standard approach for this type of analysis.

However, an analysis of several areas will serve to illustrate the nonsense in their application of this classification – some analysis was given in the earlier critique and this is still valid, but more details are given below, starting with the first area, 1A, described as "*High density two storey detached residential development located on Effingham Common Road within medium to large scale garden plots enclosed by Thorne Wood to the east."*

Figure 1. Area 1A “High Density” Housing on Effingham Common Road



The Google earth snip shows that this description is a fantasy – the houses are not enclosed by Thorne Wood, Thorne Wood is 190m approximately north from the end house of the 6 houses. The boundary to the west is Effingham Common Road with the end house (Meadow Cottage) facing the rear garden of the first house in Leewood Way. To the north is open farmland, bordered by Thorne Wood, 190m approximately north of the other end house, Terriston. To the east is open farmland, Effingham Lodge Farm. To the south is St Lawrence playing field and another field, all open and undeveloped. The single storey St Lawrence school building is 183m to the south.

The actual density is easily calculated. The 6 houses are set in an area of 1.73 acres (0.7 ha) so the calculated density is 3.5 houses/acre, or 8.6 dwellings/ha. Under no circumstances could this be considered as high density, or as enclosed. The description provided by Pegasus was inaccurate and can best be described as a fantasy, developed to ensure a predetermined conclusion was reached.

Area 1K. "*High density two storey detached and semi residential development located on Orchard Gardens, Mount Pleasant, Norwood Road, Norwood Close, Strathcona*

Avenue, Woodlands Road and Links Way. Properties located within small scale garden plots enclosed by fencelines, hedgerows and buildings.”

Figure 2. Area 1K: “High Density” Housing



The area shown is 23.9 ha, 59.1 acres, and has approximately 434 buildings in total, predominantly residential but including several commercial buildings. Thus the density is 18.2/buildings ha, or 22.7/acre. This density is lower than being put forward in Effingham's Neighbourhood plan by the Parish Council, and much lower than developments in villages given planning permission by GBC during 2013/14, at 71 dwellings/ha. So although high by comparison to most of the rest of Effingham, density in this area would be considered low to medium by current standards. The highest housing density in the Berkeley Homes proposal was 31.2 dwellings/ha, and this was described as low density.

The north eastern boundary of this area is the A246, but across that road are the open areas of Browns Field, King George V playing fields and recreation area, as well as (to the west) an open field on Rolls Farm. The southern boundary is open farmland, and the western boundary Effingham golf course. This means that even in this area, there is a sense of openness and connection with the green belt beyond the village, which is obvious in the Google earth snip given in Figure 2.

Note the disparity between these two areas, both described by Pegasus as high density – in area 1A, the actual density is 8.6/ha but in 1K is 18.2/ha. Even in their contrived categorisations Pegasus were not consistent.

Finally, a third area, to further illustrate how poor and subjective this analysis was – area 1I, housing on Manorhouse Lane.

Area 1I “Medium density single and two storey detached residential development on Manorhouse Lane with medium to large scale garden plots enclosed by hedgerows and treebelts to the east of King George V playing fields.”

There are 8 houses in this area, an area of 1.53 ha, 3.8 acres, so that the density is 5.2 houses/ha, or 2.1/acre. Pegasus would have had to come from a strange parallel universe to believe that this could be described as medium density housing. To the north,

the boundary is a hedge beyond which is the extensive gardens of Manor House school; to the east the boundary King George V playing fields. Spring gales showed just how fragile the treeline in this (and other areas) is – one tree was taken down by the gale and another felled as it was unsafe. To the west is the lane, and beyond the lane, open farmland. The short southern boundary is the A246. So this area is not enclosed, there is a very strong connection to the open green belt beyond the houses – and their hedges.

Figure 3 “Medium Density” Housing on Manorhouse Lane



Of the 14 areas defined on their stage 1 map, Pegasus identified 3 as high density – but again without any numerical definition of high density. Analysis above shows how misplaced these definitions were. 7 areas were classed as medium density – and again, an example above shows how misplaced these were. Three areas were classed as low density, and just one as open farmland. Note that Browns Field and King George V playing fields were classed as low density. A detailed analysis of all areas should not be needed to show that in many cases (if not all) the categorisation was wrong. But in the parallel universe occupied by Pegasus, three areas defined as high density were enough to decide that the whole of the perceived village area exhibited a high density of development. This was a conclusion that even George Orwell's Ministry of Truth would have found questionable.

It was wrong because Pegasus had an outcome in mind, and mere facts were not going to prevent their fixed conclusion from being reached.

In the Stage 3 insetting criteria, the only change was that the reference to the calculation of the built area was dropped, no doubt because this was clear evidence of bias in their analysis. No other changes were made, so that the “score” remained the same – one plus and two negatives for Effingham, so they were able to reach the conclusion that Effingham should be inset. Pegasus did inset a suggestion that this should be done only after consultation with the neighbouring Local Authority, Mole valley District Council. No notes of any such meeting have been provided.

The actual position remains the same as in the earlier critique – Effingham is an open village, with a great deal of open space within the village. There are strong connections to the green belt beyond the village and so the village makes an important contribution to the openness of the green belt.

In reaching the conclusion that Effingham should be inset, Pegasus had to totally ignore reason and fact, and produced a report that was shameful in its bias. It is highly likely that this same bias was evident when recommending other villages should be inset into the green belt, so that the real contribution other villages make to the openness of the green belt is unknown. Preconceptions throughout this report are evident, and the kindest thing that can be said about it is that its determination to ignore facts in order to reach the destination of fixed conclusions is heroic. However, it is a discreditable report, and it should have no place in the Evidence Base that informs the Local Plan process.

32 POLICY I1 INFRASTRUCTURE AND DELIVERY

We object to policy I1 Infrastructure and delivery

We OBJECT to this policy as it stands. Various aspects of Infrastructure are acknowledged as congested, inadequate for the existing population and not able to accommodate much growth. However, greenfield sites – requiring heavy infrastructure investment – are targeted in order to generate CIL income for the council. This is not sensible. The current draft CIL scale also encourages development on greenfield sites rather than brownfield.

The methodology commissioned by the Council to assess traffic and the corresponding roads infrastructure needs is inadequate for the purpose of the Local Plan and identifies only the tip of the iceberg in terms of existing congestion. Looking at local traffic situations around the Borough it becomes clear that the schemes proposed will not solve congestion and the local road network has not been given sufficient consideration. Under the growth proposed some locations would require highway schemes that involve demolition of property and road-widening in residential areas to solve the resultant congestion. Even the A3 improvements are not guaranteed to take place but they are being used to justify removing large areas from the Green Belt before detailed traffic assessments have taken place. These detailed investigations are being deferred until the planning application stage and will be left to developers to prepare. If a site then proves to be unsustainable its Green Belt protection will have been lost for no reason and unsuitable development will take place by a more insidious process.

With regard to SANG provision, GBC has demonstrated that it has no genuine interest in conserving and enhancing biodiversity and clearly regards the Thames Basin Heaths SPA as an obstacle to be overcome rather than a valued asset. This is underlined at the end of the Policy wording which indicates that the council is more interested in meeting its legal responsibilities than actually protecting wildlife. GBC is failing to take account of existing biodiversity at sites selected for SANG provision.

Some infrastructure, as identified in Figure 1 of the draft IDP- is within the control and remit of Guildford Borough Council – they have some influence in relation to planning – but much is under the control, and is the fiscal responsibility of, Surrey County Council or Highways England. It is not realistic to assume that car use can effectively be replaced for all or even many users. Those who are disabled or infirm cannot easily substitute car journeys with bike travel: the elderly; the disabled; those caring for young children (particularly uncertain bike users and those with multiple children to care for); those wishing to use cars for supermarket or other bulky shopping; those who wish to commute to work and have no facilities for showering or changing on arrival; those who have lengthy and tiring commutes at present, for which the car is the final (short) element of a long journey (for those commuting into London from outside Guildford, a daily 3 hour commute is typical; this cannot realistically be extended by extensive cycling). All these factors mean that the replacement of the car with cycle use is likely to be overstated by many studies, particularly given narrow roads which do not allow effective or safe bike lanes. Funding is not the only - nor the main - obstacle to improving infrastructure within the borough, and this seems not to be recognized. Guildford is a gap town, set in a bowl within the Surrey Hills Area of Outstanding Natural Beauty to the south of the borough, and with large sections of the borough affected by the Thames Basin Heath Special Protection Area to the north. There is a ribbon through the middle of the borough which contains rail and road links to London, but is

already heavily congested, is Green Belt, AONB, SPA or more than one of the above. Very little of the borough is available for extensive development of infrastructure or any building. Do we really want solutions that involve driving new roads through our remaining countryside – including the AONB – at huge cost in financial and environmental terms. Such solutions may be the only ones left when the inadequacies of this proposed Local Plan are realised after the event.

Policy indicates note an intention to pool Community Infrastructure Levy from most new build development and to use CIL receipts to assist in provision of infrastructure needed to support the delivery of the plan. As with other aspects of planning, there is a failure to recognize that out of town settlements in particular have particularly high requirements for additional new basic infrastructure in order to exist at all – roads, sewers, water provision, electricity, gas, telephone and broadband links will all need to be provided and in many cases the links to existing services will need to be upgraded before these can be implemented. The ability to divert funds from CIL to other uses will be inherently limited, not least that otherwise the proposed settlements will not be able to function. The Council strategy of taking CIL from new build in the Green Belt seems to be to pay for roads within the town centre, as indicated in the policy which notes that legislation prevents the use of planning obligations to fund existing infrastructure deficits. In the reasoned justification, it is indicated that the council will be prepared to negotiate if an applicant claims that the infrastructure requirements for their development make it unviable. This means that some developments will go ahead anyway and worsen the infrastructure deficit. The Policy claims that infrastructure needed “should” be provided and available when first needed but we have no confidence in the council enforcing this.

The absolute constraint on developmental capacity within the borough represented by the infrastructure limitations cannot be swept aside, but the council has ignored this and failed to apply a constraint on the housing number.

We are not convinced that the extent of existing traffic congestion has been fully recognised by the SCC transport assessment because the methodology employed waters down the level of traffic observed. This has knock-on effects when modelling the various development scenarios. The result is that the requirements identified (expensive though they may seem) are the tip of the iceberg. One of the easiest issues to understand is the use of average peak hour flows for the baseline data. SCC acknowledge that that this is “typically lower” (see Transport Assessment 4.13.4 but GBC prefer the averaging approach with some eloquent wording in their Headline network metrics (3.9). A much better solution would have been to collect reliable baseline data that allowed for the effects of queuing and modelled each hour (or a shorter time period). Such an approach would have cost more but GBC seem unwilling to go the extra mile for reliable evidence while being content to spend large sums of money on propaganda exercises such as their one-sided video. There are other more technical reasons why the transport assessment methodology fails to fully identify current and planned congestion.

Planned developments for Guildford and Waverley Boroughs were modelled together but growth for the rest of the UK was allowed for only using the DofT forecasts. As a result it is not clear whether adequate allowance has been made for significant developments planned for Woking and other neighbouring Boroughs. This represents an inconsistency in approach with the West Surrey SHMA.

Many of the results for the PM peak are missing (TA 4.1.11 states that “these can be set out in an addendum report at a later date”). We believe that those who need to travel on the roads in peak hours will be every bit as interested in their future journeys home as they are for going to work. Publication of the Transport Assessment was delayed until the start of the consultation period so perhaps the non-inclusion of many PM results was simply a result of running out of time.

The Model Development Validation Report does include some interesting baseline data that may be of interest to residents in terms of local knowledge of traffic.

We are not convinced that it would be practical or desirable to end up in a position where the only solution to traffic congestion is to build many more new roads as by-passes through the Surrey countryside, or turn existing roads into dual carriageways, or demolish buildings (some of which may be historic) in order to accommodate higher capacity junctions in built-up areas.

It is noted that the infrastructure Development Plan was developed using hotspots identified in "OGSTAR" (the previous Transport Assessment used for the 2014 consultation) as a starting point. (See Transport Topic Paper (5.56)). However, the site list used for OGSTAR was not even compatible with the former draft Local Plan let alone the current one. Despite this, the Key Evidence mentions the June 2016 TA but not OGSTAR.

Appendix C (Infrastructure Schedule) is lacking in detail concerning what work will actually be carried out for most of the Local Road Network projects and the cost estimates are clearly at the guesswork stage suggesting that these schemes have not been fully thought through or checked for viability. If more detail is available then why not provide it.

It is not clear whether CIL will be received in time to put the required infrastructure in place for each development – or what penalties will be applied for late payment.

The Monitoring Indicators rely entirely on annual CIL receipts and spending. Surely they should look at actual infrastructure delivery and any changes in its adequacy.

The local plan does not state an objective for congestion. The two strategic objectives that are included for infrastructure refer to supporting sustainable development and delivering a balanced system. However, in para 2.15 there is an aspiration expressed about opportunities '*to improve the performance of the road networks through transport infrastructure and service improvements*', which taken with the previous paragraph includes reducing congestion. The evidence so far shows that this will not happen.

The mitigation proposed is not sufficient to overcome the problems that will be caused by the level of growth in the local plan. **Congestion will worsen.** The network will lack resilience and be vulnerable to disruption due to incidents. Minor roads will have to cope with a lot more traffic, for which they are unsuitable.

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33 POLICY I2 DEPARTMENT FOR TRANSPORT

We OBJECT to this policy as it stands. This policy is concerned only with the strategic road network – the A3 and M25 for which the responsibility and decision-making lies with Highways England. It is only reasonable that the council will work closely with Highways England to ensure that the Local Plan does not utilise land in a way that limit the scope for future improvements.

However, the proposals for the A3 are undecided and the council has suggested a very expensive tunnel proposal that, even if HE decided to go ahead with it, is unlikely to be delivered until the end of the plan period. Less expensive alternative A3 improvements would not be delivered before implementation of the current draft Local Plan and would deliver a massive growth in traffic. The road improvements are likely to lead to significant disruption to traffic during the construction phase on top of an already overloaded road network. It would be folly to make matters worse by committing to such a large housing number and the only logical conclusion is that a very significant traffic constraint should be applied to the OAN for this Local Plan.

Funding for prospective road improvements has not been secured.

The wording of this policy is far too vague. Terms such as “working with” Highways England, to “facilitate” improvements, “to take account” of “emerging proposals” mean that this policy is, in effect, meaningless. Typographical errors – such as the misspelling of “licensed” – must also be corrected.

The Road Investment Strategy phase 2 (RIS2) for the period post 2020 is currently in the research stage. Until the research is completed it is impossible to prejudge what impact this will have on the Strategic Road network. However, the Strategic Transport Assessment does state “4.8.6 It should be noted that despite these improvements, Figure 4.7 shows the A3 is still operating overcapacity with resulting impacts on congestion.” and “4.5.10 Currently it is unclear why some minor roads in or just outside Guildford town centre are showing increases. These include roads such as Nightingale Road, Denmark Road and Tormead Road. However, it could be related to re-routing occurring as a result of the improvements to the A3 through Guildford attracting drivers to both join the A3 and remain on the A3 at Guildford and weaving through local streets.” Also, at 4.8.3 “At the same time, average vehicle speeds increase not just on the A3 but across the network within the borough as a whole. However, despite this it should be noted that although the average speed across the network in Scenario 5 is higher than in Scenario 1 (the Do-Minimum), there are differences within the network with average speeds on A roads and minor roads lower than in Scenario 1.” In other words, traffic congestion on the local road network is predicted to be worse under this draft Local Plan.

It is possible or indeed probable that no further funding will be available, or that any funding will not meet projected full costs. If this funding is unavailable in full, then this policy should clearly state that projects cannot be developed.

RECOMMENDATION:

We propose that unless guaranteed public funds are available to cover costs in full , there should be no development of any individual sites of more than 10 homes outside the urban areas.

34 POLICY I3 SUSTAINABLE TRANSPORT

We object to policy I3 Sustainable transport for new developments

This is another vaguely aspirational policy, based on wishful thinking and not grounded in the practical realities of daily life. It consists of a standard, box-ticking list of local government measures unrelated to the specifics of the plan. Like infrastructure, transport appears to be an afterthought; the policy fails in its essential job of guiding planning decisions, since it assumes development of any kind can be supported by sustainable transport.

We support the concept and aim but OBJECT on the grounds that the practicalities of sustainable transport have not been properly considered, it is not sustainable to build dormitory towns and call them sustainable. Not everyone can cycle all the time.

How can large developments outside the town centre maximise sustainable travel? This is a matter for the planning process - the further from the town centre, the less sustainable the development will be.

Reliance on cycling discriminates against vulnerable members of the community. How can the disabled, those with small children, or the very old, or the infirm, or those who are ill, cycle outside the town in order to commute, or even inside the town? Only some people cycle – and Guildford has some steep hills, especially going out of town. Park and rides are slow – how can those with a 3 hour commute add 1 hour to their journey from using park and rides?

The only sustainable mechanism for new developments is to have them in the town centre close to the railway and the main shopping links where a hoppa bus can provide satisfactory links for those who cannot walk or cycle. While we welcome the intention to encourage rail travel by adding two new stations there could be unintended consequences.

Once again we see the word “expect” used which means the policy has no teeth. The word “expect” must be replaced with the word “require” so that this policy is enforceable.

There are a number of problems with this policy.

Congestion is a widely recognised factor in the local area of Guildford, and this is a major factor in the public response to the proposed housing numbers, which represents more than a 25% increase in housing numbers in a borough that is already profoundly congested. [Source: SHMA p61: itself sourced from ONS for 2013.] Residents recognise that to increase the population by this level within the existing transport provision is not feasible, and this informs much of the public response to the proposed level of housing accommodation.

It is not clear that this recognition, which is widespread through the borough, is shared by those who have drafted the Local Plan.

Guildford is a commuter town, which (compared to London) offers better quality of life and lower house prices, so it will continue to be a commuter town for the foreseeable future. As a result, access to the stations for commuting is of significance. It is not realistic to assume that traffic to stations for commuters can be replaced either by bus services (slow, intermittent, expensive, and in many cases absent completely) or by cycle. There is a capacity issue of car parking at the station, which effectively creates an absolute constraint on the feasibility of commuting from Guildford.

Cycling is attractive, and, for the urban young, especially students, it is both practical and cheap, and can be quick. However, as noted, those en route to work cannot be assumed to be able to cycle in working clothes. Elderly members of the community, those transporting small children, and the disabled cannot participate in cycling except to a limited extent. Effectively the “average” person deemed to be capable of cycling to substitute for car trips is an able-bodied adult not travelling to somewhere where smart clothing is required, not needing to arrive clean (or with showering facilities on arrival, not provided by all employers); this is not sufficiently widespread

in terms of the local demographic for travellers that it should be allowed to determine policy—and of course, not needing to transport, for example, supermarket shopping after the trip. What about the disabled? the elderly? those looking after more than one child? Are they to be housebound? This is not a reasonable strategy. Before transport and buildings are determined on the basis of such a policy, it is also imperative that safe cycle routes are implemented through the borough. Cycling in winter on rural roads is inherently more dangerous. Upgrading these roads would not be feasible in terms of cost nor desirable in terms of local character.

Cycle lanes which disappear into normal traffic lanes , which travel over potholes and which allow cyclists to be threatened by HGVs are not conducive to wider cycle usage, nor should wider cycle usage be encouraged until it can be demonstrated that it is safe, which currently, locally, it is not. The A25 cycle corridor scheme (Part of LRN1) will exchange the risk between cyclists and vehicles sharing space for the risk between cyclists and pedestrians sharing space. Much of the A25 has no pedestrian area anyway outside the urban space. Many cyclists travel at high speed and they will be put into conflict with pedestrians including mothers with very young children and schoolchildren many of whom need to cross the road and hence cross the cycleway. This is likely to lead to accidents and pedestrians are being disadvantaged.

Road capacity reduces as average speeds come down due to congestion. Where proper cycle lanes or off-road lanes are not provided then it is inevitable that safe driving will lead to reduced average motor vehicle speeds and gap development in the traffic stream. Both these effects act to reduce the capacity of our local road network. This loss of capacity has not been recognised in the Transport Strategy.

The concept of the park and ride with access into the town limited for those who live outside the town, is similarly flawed. Park and Ride is expensive, cumbersome and slow. It should be noted that in Oxford it has had a disastrous impact on small local retailers which is a retail segment that it is important to retain and support.

Use of park and rides increases the use of the strategic road network by local users, which is not what it is designed to do.

This proposal is combined with aggressive exclusion from the town of those who are living in peripheral communities, which will increasingly resemble housing estates. This is a strategy for sink estates through Surrey instead of the Green Belt - this is not a strategy for growth. Head offices will choose to go elsewhere, because highly skilled staff and management in the cutting edge industries that GBC wants to encourage, will not choose to live in a dense housing estate. The existing extent of traffic congestion has not been fully recognised. As a consequence the impact of the various development scenarios has been understated and the infrastructure costs are an understatement.

The transport studies are incomplete and unpublished and this should have led to deferral of consideration of the Local Plan consultation process until it was possible to revise the plan post publication of the studies. This matter was raised by a number of councillors at the Full Council meeting on 24 May 2016 when the consultation was approved, but a motion to defer was overturned by the majority party.

Cross-subsidy in terms of infrastructure is envisaged . The infrastructure deficit needs to be resolved before there are large numbers of new residents exacerbating the current congestion. The funding of the new developments through CIL and S 106 is expected to contribute to the transport impacts across the borough, and there is negligible concern for the transport problems created within those new developments or in areas adjacent to them. This is not acceptable to existing residents and is likely to cause some problems with the future residents too, who may arguably feel aggrieved that the road funding associated with their developments is being subverted to other areas. While this may be permissible under the revised CIL regulations it is questionable whether it is morally acceptable to grant planning permission to build on the Green Belt in order to cross subsidise the building of roads or other infrastructure in the town centre or

elsewhere across the borough or outside it.

Insetting of villages and the proposed relaxation of planning restrictions anywhere outside settlements (Green Belt or not), implied in P2, will lead to substantial infilling that will not require traffic assessment but will contribute a highly significant amount of additional car journeys overall - by a more insidious process than the large developments proposed.

Costs for rail or bus travel could be substantially reduced and would incentivise their use; but these are outside the remit of GBC and so cannot be encouraged by them.

It remains to be seen whether the proposed new stations will be delivered as they are not entirely within the council's control. While we welcome the intention to encourage rail travel by adding two new stations there could be unintended consequences as the roads local to both sites are heavily congested. If parking facilities are inadequate this could lead to a need for onerous parking restrictions on roads nearby – possibly affecting small businesses adversely.

If parking facilities are adequate this will encourage more traffic onto local roads and commuters tend to be hurrying to catch a train or anxious to return home after a day at work. That does not bode well for the safety of pedestrians needing to cross those roads. House prices near to stations tend to attract higher prices and this will increase the profit motive to developers wanting to build on greenfield sites nearby. It will also mean that so-called affordable housing will be even less affordable at these sites. It may also lead, over time, to an undesirable loss of social-rented housing in the vicinity. A minor issue is that stopping at the additional stations will increase the train journey times to and from Guildford town centre on the lines affected.

Detail in Policy wording – flawed drafting:

The policy begins and ends with the weak and totally ineffective word, in planning terms, "expect".

Contributing through CIL will not necessarily address needs local to the development concerned, and created by it, but may involve solving existing problems elsewhere in the Borough.

Bullets 4 & 5 – improvements to park and ride facilities imply increased car usage from outside the town and the parking provision acknowledges that most journeys will be by car.

Bullet 6 - Has the Vehicle parking Supplementary Planning Document been published? It is not listed as key evidence but the policy refers. How can a policy have been determined with reference to a non-existent part of the evidence base?

Bullets 7,8, 9 & 10 are weak & aspirational with let-out words such as "facilitate the use of", "wherever possible", "contribute" and "where appropriate" (and poorly bulleted!). How will the use of ultra low emission vehicles be facilitated? This is such a vague aspiration as to be meaningless.

The policy only "expects" new developments to contribute, demonstrate adequate provision, etc – it should enforce them. A transport statement AND assessment ought to be a fixed requirement – not a matter for negotiation – while the policy implies that this might be waived even for sites that generate significant amounts of movement.

The construction traffic, noise and pollution generated by meeting the proposed housing number will be excessive. It will have a highly significant impact on the amenity and health of those residents living close to the development sites and those who live on the routes that will be taken by the construction traffic.

The last paragraph says nothing new in planning terms but does mean that the Local Plan has not fully and properly considered the traffic impacts of the proposed sites. We have experience of how misleading the TAs produced by developers can be – using averaging techniques and understated baseline figures, days when schools are not operating and many other devices to pull the wool over the eyes of planning authorities. This aspect is a denial of responsibility by GBC. The result is that Green Belt and countryside will be released for development when fuller consideration of traffic impacts at the Local Plan stage should have prevented that. If the planning authority is taken in by developers' TAs then wholly unsuitable developments will be

permitted.

Introduction:

The spatial development strategy (paragraph 4.6.20 and Policy S2) does not address the development needs of the borough ensuring distances are practical; this is certainly not the case with all the development sites. For example, the Wisley airfield site will generate a massive increase in vehicle journeys; developments in West Horsley will lead to greater car use, as will the proposed developments at Garlick's Arch and in Send. The obvious site choice for sustainable development would be on brownfield sites in the town but the Local Plan proposes allocating those sites to the declining retail industry instead.

Paragraph 4.6.21 suggests that sustainable transport is promoted. Far from providing sustainable transport this Plan will generate a massive increase in motor vehicle journeys. The Plan cannot force residents to ride bicycles or walk everywhere.

Justification:

Paragraph 4.6.22 seeks to set out a reasoned justification and alleges that development should offer real travel choice by sustainable transport modes. There is little sign that this is being taken seriously enough now.

Paragraph 4.6.23 proposed to bring forward a Vehicle Parking Supplementary Planning Document. It is not clear what to make of this. Failure to provide off-street vehicle parking will not prevent residents owning cars and finding somewhere else to park but it may make life difficult for key workers to commute to their place of work. How can a consultation take place relying on non-existent background documents which are key parts of the Evidence Base? How can anyone comment on non-existent documents, and even if brought forward part-way through the consultation, any comments will be prejudiced by the absence of this informing the start of the consultation.

Paragraph 4.6.24 refers to the Sustainable Movement Corridor. Bus services are aspirational but economic reality may mean that they fail to persist. There is not enough detail published on how the SMC will be delivered – suggesting that it is aspirational rather than fully thought through.

Paragraph 4.6.26 refers to reviewing existing transport facilities and likely transport generation as part of assessing the amount of incremental travel demand. That consideration should have taken place in a robust and detailed manner on a site-by-site basis before the sites were allocated in the Local Plan. It is not sufficient to leave that until the planning application stage as intended by GBC and SCC, given that all sites will be subject to “permission in principle” under the Housing and Planning Act 2016 and so will not be capable of subsequent rejection on these grounds.

Paragraph 4.6.27 notes that Development must mitigate its transport impacts. The measures described rely entirely on people taking them up and not dumping their travel information packs in the nearest bin. It is clear that GBC, in response to concerns about elderly and disabled people failing to be coerced into riding bicycles are now suggesting tricycles to overcome this obstacle to their aspirations. They should be aware that while tricycles may help with balance issues they are heavier and harder to ride uphill. While the policy (unusually) notes that mitigation must be provided, in fact this is then diluted to suggest that facilities for electric car charging points and encouragement to car-share can be sufficient; all are optional and therefore meaningless.

However well designed a development is it will make matters worse during construction and if on a greenfield site, it is hard to see how it will achieve environmental benefits. On the other hand, replacing inefficient buildings on a brownfield site could lead to benefits in the long term.

Paragraph 4.6.28 notes “Developers should have regard” to the “Infrastructure Schedule at Appendix C”. The only thing that developers have regard for is forcing their application through and maximising their profit – that is the business they are in. Appendix C is lacking in detail. It notes, for example that there will be new town centre bus facilities at a cost of £5-10 million – such vagueness make it clear that no real costing or analysis of proposals has been prepared, and

that the Infrastructure improvements proposed have not been properly considered. Having regard to fluid and uncertain proposals is effectively meaningless as a constraint or a requirement.

Paragraph 4.6.29 requires that applications need to address the transport implications of the proposed development. Experience with recent planning applications suggests that developers will do everything in their power to understate transport impacts and we have no faith in GBC and SCC taking a sufficiently robust line on this.

Key Evidence is missing or inadequate.

The Strategic Transport Assessment (SCC 2016) is listed as "forthcoming", but this plan has been produced in the absence of any strategic transport review.

There are further inadequacies in the Evidence Base, highlighted in the following annexes, which include examples of deficiencies, ambiguities and inadequacies in the transport and infrastructure evidence. This is not a comprehensive list of deficiencies, but serves as an illustration of the poor evidence on which decisions have been based.

Annexe 1

Comments on Guildford Borough Transport Study 2016

Page 2 – "address the historic infrastructure deficit" - developers are not required to do this ?

Page 2 – It is wrong to claim that the cycle infrastructure along the A25 is good – and many cyclists are not careful, so putting them in contention with pedestrians is not a good idea.

Page 5 – The decision on Heathrow or Gatwick has yet to be taken but airport expansion in the south- east cannot be regarded as sustainable development and, although GBC has no control over such external decisions, its own growth agenda will drive a need for that expansion.

Page 6 An additional weakness is alternative "road closure diversion" routes for the SRN on the LRN

Page 6 Are the "Committed Improvements" actually committed and guaranteed to be delivered ?

Page 7 The rail strategy does not provide for Wisley (residents would drive to stations)

Page 7 How long will it take to deliver Crossrail 2 ? "We hope that Crossrail 2 could be operational by 2030, but we are in the very early stages of planning and no decision to build it has been made."

Page 7 Guildford platform capacity still many years away if ever.

Page 7 The rail strategy anticipates many improvements that have not been secured and may have unintended consequences if they proceed (see above)

Page 7 The Southern Rail Access to Heathrow ##[see the feasibility study dated December 2015– although other proposals may be put forward (e.g. by Hounslow)]## is still in its early stages and would have significant impacts on open space beyond our Borough. For example, all options in the feasibility study would use Staines Moor SSSI and Option 4 would use Bedfont Lakes Country Park (a Local Nature Reserve and SNCI).

The various options would use existing commercial, residential and highways land in varying degrees. It seems unlikely that a solution will be delivered within the Plan period and removal of highly valued open space with high biodiversity (wherever it is in South-east England) cannot be regarded as sustainable.

Page 10 and 13 There is a stark contrast between the plans for the town centre which involve encouraging a reduction in traffic by reducing roadspace and the plans for the SRN and parts of the LRN which involve increasing capacity. While increasing capacity may reduce some areas of congestion in the short term, history suggests that traffic will rapidly grow until the improved roads are congested once again. This can hardly be regarded as sustainable. A sustainable option would be to apply a very substantial traffic infrastructure constraint on the housing number.

Page 10 While the A3 Guildford Tunnel aspiration has some environmental advantages over widening (in particular for residents living close to the A3), the environmental burden of the construction phase will be far higher and aspects such as location of ventilation stacks and their

local effect (in all weather conditions) do not appear to have been considered.

Page 14 Under Weaknesses the point about A roads in Guildford Town also applies to surrounding areas in the Borough and beyond. The anticipated improvements ignore existing congestion to the south and east of Guildford – presumably because SCC's transport assessment methodology only identifies the tip of the iceberg. The current Plan will see increased congestion and a resultant reduction in air quality in many areas beyond the town centre.

Page 16 "Largely commercial bus services" is seen as a strength whereas it should be seen as a weakness with a trend to reduced subsidies and the provision of bus services, especially in rural areas, being increasingly dependent on commercial gain. It is difficult to see this changing under the current Government cuts philosophy. The point "Subject to business case including funding" under Aspirations demonstrates this point.

Page 18 We welcome the aspiration to "Expand the public realm through significantly extended pedestrian-priority areas"

Page 19 Guildford is well behind other areas in monitoring air quality let alone attempting to reduce it.

The introduction talks about reductions in some pollutants. This may be the case for pollutants such as Sulphur Dioxide, which contributed to the visible London smogs, but it is not true of diesel vehicle emissions which have increased as a result of Government policy including its aggressive growth agenda and population increase through immigration.

30 accessible electric vehicle charging points are only an aspiration and will be nowhere near enough if there is a real shift to electric vehicles.

It is clear from the "Strategy outcomes" that GBC would prefer not to follow other areas in proactively tackling air quality.

Page 22/23/24 The timescales indicate that the main rail improvements (Including the two new stations) are unlikely to be delivered until the end of the Plan period or even later. The sites that are supposedly justified by their inclusion will generate a major increase in road traffic in the interim and it may be more difficult to achieve this aspect of modal shift in the longer term. The same can be said about the other traffic infrastructure proposals. Residential development is being scheduled before the infrastructure that it will need.

Page 24 Monitoring – "Increase" needs to be in proportion to population growth as otherwise failure will be taken as success. "An Increase in average vehicle speeds" is inconsistent with the desire to reduce the number of persons killed or seriously injured. For example, some A roads pass through residential areas where pedestrians, including schoolchildren, are trying to cross the road at peak times. It is noted that increase in vehicle speeds is only desired in the morning.

Going home from work does not seem to matter!

Annexe 2

NPPF and NPPG The Plan ignores the points concerning Green Belt and protecting the environment. GBC have tried to get round this by spinning their messages and using misleading statistics including a major understatement of the area of Green Belt to be removed.

Planning Update (March 2015) – The point in this update concerning Green Belt has been ignored
Monitoring Indicators:

- Ten years is far too long to wait for information on whether the approach is working or not. The target requires only an increase. This would permit an increase less than that in line with any population growth to be regarded as success. The bar has been set well within the failure range.

35 POLICY I4 GREEN AND BLUE INFRASTRUCTURE

Response type: OBJECT

The Policy shows concern for conserving and enhancing biodiversity, which is welcome. We also note and welcome the intention to extend the principle beyond Biodiversity Opportunity Areas. However the current plan to build on large areas of countryside and to inset villages will have the opposite effect. The Policy appears therefore to be a box-ticking exercise with no real teeth to it. There is no mention of the value of wildlife gardening to biodiversity or the important role that larger gardens play in a village setting.

There is no mention of the impact of the plan on food production, or monitoring the loss of agricultural land.

"The natural world, its biodiversity and its constituent ecosystems are critically important to our wellbeing and economic prosperity, but are consistently undervalued in conventional economic analyses and decision-making" (Biodiversity 2020 page 11)

"As a public authority in England you have a duty to have regard to conserving biodiversity as part of your policy or decision making." (Government Planning Guidance)

Part of the problem is that "Biodiversity benefits are unpriced" and so not valued by those who look only at the more obvious and simplistic economic benefits.

We have some concerns that "enhancing" the River Wey in the town centre will avoid using the available brownfield land around Walnut Tree Close and Slyfield for urban regeneration and sustainable housing that could otherwise be used.

The policy on Green and Blue infrastructure is broadly supported with an important and major caveat; and if disregarded this should count as an objection.

However, it is noted that the largest areas of industrial brownfield land within the borough are near to or adjacent to the River Wey, particularly in the Walnut Tree Close area and in the Slyfield industrial area.

These areas could support much more housing than the relatively small numbers indicated in the policy on the town centre, under a town centre regeneration scheme. This would have huge benefits for the community as a whole since relatively run down areas would be subject to regeneration, the river banks would be cleaner and more attractive.

It is vitally important for the town as a whole that the run-down Walnut Tree Close area is used for well-designed housing, as indicated by the Mastervision document first draft compiled by Allies and Morrison. John Rigg of Savills and Guildford Vision Group indicated to the Scrutiny Committee of GBC that initial commercial projections indicated that the Walnut Tree Close area alone could provide 4000 homes. This is significantly in excess of the current GBC proposals.

Both Allies & Morrison and GVG initially indicated that they believed that this site could be available for regeneration within the critical 5 year window required for the local plan. It is therefore essential that nothing in this policy should jeopardise anything that could lead to the Walnut Tree Close area being a regeneration zone.

As has been noted elsewhere, for reasons that are not altogether clear but appear to be connected to central government direction and a desire to maximize the Community Infrastructure Levy, there is an aggressive desire to push development on to the Green Belt at all costs, ignoring or eliminating for other reasons sites which could be used in the town for residential purposes. This has informed recent planning decisions (both the Aldi site and the Waitrose site were originally zoned for residential purposes and were eminently suitable for this) and this bias seems to be informing the Local Plan.

As a result, it is important that the desire for Green and Blue infrastructure does not become an excuse for preventing regeneration of Walnut Tree Close. It is noted that the Council has stated

that "The Council is keen to protect the watercourses from inappropriate development that would spoil their character". The bus station adjacent to the River Wey, and the empty car parks associated with empty factory space, are hardly attractive development—well designed mid height (3-4 storey) apartment blocks would be a great improvement to the river corridor, offer major scope for sustainable regeneration, and would prevent the need for any incursion into the Green Belt to meet reasonable housing needs.

That regeneration zone would be highly sustainable, because it would be within 1 mile of the railway station, adjacent to the A3, and would eliminate an area of huge congestion in the town because if the industrial sites were replaced by housing then the residents would commute by train or walk to work rather than having to drive in to an industrial estate.

It certainly does not seem appropriate to create substantial new parkland on current hard standing. The protections to which this policy refers largely describe existing open space, which is of great importance. But to determine not to utilize brownfield land for residential use at an appropriate density in order to force building on to the Green Belt would seem to be in contradiction of the principles of use of the Green Belt applied in the Gallaher Homes v Solihull court of appeal case, where the hierarchy of use is clearly defined, with urban brownfield required to be used as a first option.

So there is some considerable support for the residential element of this policy, with the note that this should be explicitly amended to permit construction of a regeneration zone on the brownfield areas surrounding the river in the middle of the town, and that this should not be held up pending yet more transport studies (Guildford's track record on brownfield utilisation is poor), but should be implemented with immediate effect.

It is not clear what form the "parkland" along the River Wey will take but the images available in the Town Centre MasterPlan suggest mown grass similar to the area around Millmead. This misses an opportunity to enhance biodiversity and enable town centre residents to engage with wildlife. Engagement with wildlifeshould mean much more than throwing bread at ducks and chasing pigeons. To achieve a wildlife corridor through Guildford, that can also benefit the health and well-being of residents living close by, the green space retained beside the river should be managed with the needs of wildlife in mind.

Responses to policy notes:

4.6.33 Villages are generally permeable to wildlife. The lower density of housing and presence of gardens (especially larger gardens) provides a corridor for movement across the residential area. Insetting of villages and the relaxation of planning restrictions in the Green Belt implied by Policy P2 will lead to infilling, "garden grabbing" and consequent loss of biodiversity. It will replace connections and corridors between habitats with barriers and lead to further fragmentation of our natural infrastructure.

4.6.34 In the past Guildford Borough Council recognised the role that wildlife gardening and management of parks and open spaces for wildlife could play in enhancing biodiversity. There seems to have been a shift away from this. These aspects should be recognised in the Plan as well as the importance of BOAs and although 4.6.35 goes part way towards this we have yet to see the GREEN AND BLUE INFRASTRUCTURE SUPPLEMENTARY PLANNING DOCUMENT.

4.6.36 This is long overdue and should include the way that our lanes are managed. The current approach is unsympathetic, sometimes damaging tree roots and scarce native plants. It seems to be oriented towards encouraging faster traffic rather than recognising the traffic-calming effects of natural vegetation (See the original Quiet Lanes Initiative)—management of open spaces and lanes

We await the Countryside Vision with interest.

4.6.37 It appears that Policy I5 has been omitted.(We think this means P5 – more evidence of slapdash work)

4.6.38 We agree with this statement but public access is frequently damaging to biodiversity—

the more obvious examples being dogs out of control in the vicinity of ground-nesting birds and trampling of grassland habitats. Public open space must be protected for the reasons given but wildlife needs undisturbed (or at least less disturbed) space too if it is to thrive.

Responses to definitions:

This section starts with a definition that is not a proper definition and is followed by statements that are not definitions at all, apart from the last – suggesting that this part of the document has not been thought through or checked.

4.6.42 “Biodiversity creation and/or enhancement” is not a definition – it requires definition.

Do you mean that you will create new species or encourage them to evolve ? Or do you mean that you will increase the number of species living in the Borough, or the population of each species, or both?

The points made are aspirational that have no enforcement to back them.

We support the use of green roofs and walls.

However, building on the countryside and increasing the population by such a large amount will not help vulnerable species. It will put added pressure on remaining habitats and increase light and air pollution, degrading the ability of the borough to support wildlife.

4.6.43 Arrangements with developers have no guarantee of success or longevity. They involve partial mitigation and overall loss of the original biodiversity interest of a site

4.6.44 This appears to be saying that you will deliberately put playing fields, sports facilities and other leisure activities in BOAs – but these are land uses that reduce biodiversity!

4.6.45 Our understanding of SANG is that it is intended to reduce pressure on Special Protection Areas by providing an alternative area for people to walk their dogs – and hope that they do not prefer to use the SPA. In other words they are intended to attract the type of user that is damaging to vulnerable species such as ground-nesting birds. In the desperation to find SANG land Guildford Borough Council are making use of existing open space that will not attract people away from the SPA and you are ignoring the impact on existing wildlife. For example – GBC decided to include the towpath in the Parsonage Meadows SANG as a way of also facilitating a cycle route. Encouraging cyclists and dog-walkers to use the same narrow path will not encourage dog-walkers to use it rather than the SPA. At Effingham Common GBC plan to designate an important area for wildlife and ground-nesting Skylarks. GBC is riding roughshod over the opinions of the Commoners and local residents. GBC used to put up signage warning dog-walkers not to disturb the Skylarks during the nesting season – but these signs were not put up until well into the nesting season this year and only then after complaints and harassment of Skylarks by out-of-control dogs.

In allocating sites as SANG, GBC has ignored the requirement to consider existing biodiversity and clearly have little or any knowledge or understanding of the issue. The issues relating to Russell Place Farm have been pointed out by a qualified Biologist. Many invertebrates are dependent on the dung of grazing animals and this aspect of our countryside is being steadily driven out of our Borough).

4.6.46 We welcome this acknowledgement of the damaging effects of the proposed building developments. This also has relevance to the manner in which the green spaces next to the River Wey are managed.

4.6.47 We welcome the proposals but are concerned that these may be no more than good intentions. How will GBC ensure that they are carried out fully – and paid for by the developer?

Reasoned Justification:

4.6.50 As the emerging strategy for Surrey and the Green and Blue Infrastructure Supplementary Planning Document (GISPD) are not yet available the plan should not be proposing sites that will be jeopardised. The implication is that this aspect of the plan is not being taken seriously and will carry no weight in site selection despite the guidance in the NPPF.

4.6.51 In fact some GBC contract mowing and lane management is not in line with a strategy that

is meant to protect biodiversity.

KEY EVIDENCE

Guildford Borough Policy Statements are statements – not evidence.

Additional evidence should include:

Existing SNCI surveys, including those that took place in 2004-2007.

Biodiversity evidence emerging from Neighbourhood Plans.

Evidence obtained by requests to local naturalists and natural history societies including those with a specialist interest.

MONITORING

Simply maintaining open space will not be enough for a significantly enlarged population.

Providing more open space to meet existing shortfalls or the needs of a much larger population will reduce the area of land currently in food production or providing wildlife habitat.

SANG delivery is harming existing biodiversity

It is not clear how you will measure a change in biodiversity just by looking at planning applications. “Net gains in biodiversity provided by development” is a contradiction in terms. There may well be a few examples in England where low density housing has been combined with manufactured habitat at the expense of loss of agricultural land with no surrounding habitat damage - but we see no evidence of that in the Local Plan. Even when a housing development replaces agricultural land it increases pressure on the surrounding countryside. A simple example is where houses border woodland and residents dump their garden rubbish (and often worse) over the garden fence. Increased leisure use on nearby countryside also has an adverse effect on biodiversity.

There is no guarantee that mitigations listed in an application will be carried out and their effectiveness is not guaranteed either. GBC would need to carry out follow-up ecological surveys on all sites. Who would pay for these? Are there enough consultants to carry out the work in sufficient detail? What aspects of biodiversity will be measured?

How frequently are surveys by Natural England intended to take place? How will GBC ensure that NE carry them out? A baseline of existing surveys against which changes will be monitored should be included within the plan and it must be comprehensive for monitoring to be effective.

How frequently will SNCI surveys be carried out? At what expense? The last survey published in 2007 made recommendations for an increase in the size of the Wisley Airfield SNCI and stated that this should be taken into account for planning purposes. This was overridden in the recent planning inspector’s report and the Local Plan includes this particular SNCI as a building site. This is clearly a case of hypocrisy and suggests that the Council has no genuine intention to maintain biodiversity let alone enhance it.

We believe that a survey of SNCIs is currently taking place but that it is limited in scope to the previously known sites. This prevents other sites, where genuine biodiversity enhancement has taken place (often as a result of volunteer community effort), from being recognised in this way. While every stone is being turned over in the quest to find green space to build on, no genuine effort is being made to identify biodiversity hotspots that may have been overlooked in the past. In other words the approach being taken is one that intends to make no net gain, and possibly even reduce, sites of nature conservation interest – in contradiction to the stated aims.

If an existing SNCI (or one proposed on grounds of biodiversity but not formally accepted in a Local Plan) is found to be in poor condition the action taken should be to bring it back into good condition – not to remove its status and build on it.

SITES

1 ABSENCE OF POLICY ON RIVER WEY

We object to the omission of a policy for the River Wey which was included in the previous local plan. The existing policy G11 from 2003 Local Plan should be included so that development within the River Wey corridor will only be permitted provided that:

- 1.1.1 It protects or improves the special character of the River Wey and the Guildford and Godalming Navigations, in particular their visual, setting, amenities, ecological value, architectural and historic interest;
- 1.1.2 The special character of the landscape and townscape in the corridor is protected or improved;
- 1.1.3 Views both within and from the corridor which contribute to this special character are protected or improved;
- 1.1.4 Where appropriate, public access is provided to and along the River and the Navigations.
- 1.1.5 The Nature Conservation value of the site is protected or improved

2 GREEN BELT SITES

We object to ALL Green Belt sites allocated for development in the local plan

We object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses.” This ignores the tens of thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. This amounts to a war of attrition by the Council in conjunction with developers, since many busy residents are sick and tired of repeating the same comments to deaf ears. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014.¹³

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

All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established.

3 POLICY A25 GOSDEN HILL

We object to policy A25 Gosden Hill

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 WEbelieve 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 Send 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 pour 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, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

WEobject 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.

4 POLICY A26 BLACKWELL FARM

We object to policy A26 Blackwell Farm

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.

- 4.1.1 Purpose 1 - “checking the unrestricted sprawl of large built-up areas”. There is huge pressure to develop on the western edge of Guildford; the University of Surrey has stated publicly that its key objective is to develop the whole of its landholdings, stretching west to Flexford Farm. This, combined with the indefensible boundary being proposed (a hedgerow rather than the existing belt of ancient woodland), will put more of the green belt and the Surrey Hills Area of Outstanding Natural Beauty (AONB) at risk of future development.
- 4.1.2 Purpose 3 “assists in safeguarding the countryside from encroachment” - the proposed movement of the green belt boundary on the west of Guildford to allow for development of the University in 2004 resulted in the encroachment on countryside and the loss of working farmland (including some Grade 2) at Manor Farm. The proposed future change in the boundary would result in further encroachment and the loss of farmland including further Grade 2. The proposed road development with access road from the A31 would also effectively cut off farm access to the south of the development area leading to further urban influence on this countryside. The University’s stated key objective is to develop land which includes Chalkpit and Wildfield farms leading to the risk of further boundary change and further encroachment in future years.
- 4.1.3 Purpose 5 - “assists in urban regeneration by encouraging the recycling of derelict and other urban land”

Whilst all green belt assists towards this purpose, the ownership of this land by the University of Surrey with its extensive landholdings within the urban boundary (including land it leases to the Hospital and Holiday Inn, the Surrey Research Park, Hazel Farm as well as two large campuses) means that the location of Blackwell Farm within the green belt plays an even greater and direct role in encouraging the more efficient usage of urban land.

Stopping development on Blackwell Farm would result in the University of Surrey investing in, and regenerating, land in its ownership and delivering its commitments following the 2003 boundary review (including 270 homes for key workers, 3,125 student residences and releasing further accommodation at Hazel Farm). The University has 17 hectares of surface car parking that could be built over with offices and flats. This is a more sustainable option than building over open farmland (largely grade 2 and 3a) within the green belt.

The Blackwell Farm development would result in harm to the Surrey Hills Area of Outstanding Natural Beauty (AONB), harm to an Area of Great Landscape Value (AGLV), and harm to the setting to the AONB. (Blackwell Farm forms the views into and out of the Hogs Back ridge). The NPPF is clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic beauty. All development proposals within and adjacent to the AONB must conserve or enhance its special qualities. The NPPF also makes it clear that applications for major development in the AONB will be refused unless exceptional circumstances are demonstrated and the development is proven to be in the public's interest. Guildford Borough Council has not shown that the proposed housing development or the extension of the Research Park, or the proposed link road from the A31 to Gill Avenue, is in the wider public interest. Indeed, the increased traffic through the already congested Egerton Road/Gill Avenue junction, which would result from the development, would impede emergency vehicles travelling to the Hospital and this would be very much *against* public interest. GBC's Policy P1 states that, "*The Surrey Hills Area of Outstanding Natural Beauty (AONB) will be conserved and enhanced to maximise its special landscape qualities and protect it from inappropriate development. All proposals will be considered against whether they conserve and/or enhance the setting and views of the AONB*". WEquestion how the proposal to carve a new two-lane carriageway through the AONB fits this policy, or meets para 115 of the NPPF? Finally, nearly the whole site has been identified as a "candidate area" for AONB status in the Landscape Evaluation Study commissioned by Compton, Worplesdon and Wanborough parish councils. Therefore, the entire site should be treated as though it is within the AONB during this local planning process.

The access to the proposed Blackwell Farm site will put additional peak hour pressure on two of Guildford's worst congestion "hot spots": the A31 (Hog's Back) and the Tesco Roundabout on Gill Avenue.

GBC's proposal to create a new major route into Guildford from the west at, or close to, the Down Place private driveway, and to make this the main access to the planned Blackwell Farm development, does not appear to have been thought through. There are queues stretching back from the Farnham Road Bridge as far as the Down Place driveway entrance most weekday mornings and any traffic generated by the new development would not be able to clear the junction. In order to accommodate the volume of traffic using the new junction (generated by residents of the new housing

estate, employees at the Surrey Research Park, Hospital and University, and visitors to the new school/supermarket), there would almost certainly need to be a roundabout (rather than the proposed traffic-light controlled junction) and GBC has ruled out a roundabout on grounds of landscape impact and traffic.

The secondary access to the site at Gill Avenue also presents problems, and as GBC states in its Transport Assessment (14.9.5), changes planned for the Tesco roundabout will not mitigate against the increased level of traffic through the junction as a result of the Blackwell Farm development, and this in turn will impact on the Egerton Road/Gill Avenue junction, which serves the Royal Surrey County Hospital. WEquestion whether it is responsible to allow a development that would impede emergency access to an A&E department and a major incident unit.

The traffic impact resulting from the development of Blackwell Farm on the strategic road network would not appear to be properly assessed but it would be alleviated in part (but not completely) by widening the A3. However, timing and funding for this work is unclear so there would be many years of traffic chaos before any widening took place (if indeed it does). More significantly, the widening of the A3 would create noise and environmental impact on the neighbouring residential areas of Onslow Village and Beechcroft Drive and a six-lane highway would cause greater severance between Guildford and Blackwell Farm and areas to the west.

The NPPF states in Section 6 para 47 that local authorities should “identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15”. In a footnote to this, it further adds, “To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.” WEconsider that the proposed access arrangements to Blackwell Farm are wholly inadequate for a development of this scale and thus the site cannot be “viable developed”.

5 POLICY A35 WISLEY

We object to Policy A35 Wisley

We object to 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 have 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. Scandalously, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision – a clear signal to the developers to try again.

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).19
17. Failure to evaluate the cumulative impact of this and nearby development sites on the area.

6 POLICY A42 CLOCKBARN NURSERY

We object to policy A42 Clockbarn Nursery

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

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 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. Anymore 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.

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7 POLICY A43 GARLICKS ARCH

We object to policy A43 Garlick's Arch

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

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 reliant 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.

WEobject 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.

WEobject 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 WEam 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 proposal to build 7,000 sq m of light industrial, general industrial or warehousing on the site at Garlick's Arch. There is no need to place a Strategic

Employment Site in this location when there is plenty of spare space available at Slyfield (40 ha). The Employment Land Needs Assessment (ELNA) 2015 has been reduced by 80% since the ELNA 2013. There is no longer any need to place industrial development in the Green Belt when there are plenty of brownfield sites available.

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 & 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. We 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 an ever popular past time, particularly at weekends hundreds of cyclists pass 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.

WEobject to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. WEhave 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.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

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. WEhave 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 concerns (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 11th hours 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)

8 POLICY A43a BURNT COMMON

We object to the inclusion of the land for new on/off ramps at Burnt Common (A43a).

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of 'through' traffic.

The route from London/M25 to Woking would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

WEobject to the proposed Infrastructure Schedule (Appendix C). The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick's Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

9 POLICY A44 SEND HILL

We object to policy A44 Send Hill

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

The proposed development is not sustainable because of poor infrastructure. Send Hill is a single track country road and too narrow to provide sufficient access to the site for travellers or accommodate the potential new levels of traffic the proposed development would bring.

The site is a high quality green belt amenity area within beautiful surrounding countryside and would be spoilt by the development.

A Wasteland Solutions environmental report on Send Hill dated March 2004 gave evidence of past ponding of water in the excavated area. Further development would disturb the water table and increase risk of flooding to surrounding properties.

The site was used as a GBC registered landfill site and shown on the 1963-8 Ordnance Survey maps as “refuse and slag heap”. It is therefore unsuitable for such a development on health reasons.

On the 1971 Ordnance Survey the site is shown as a “refuse tip” prior to when proper licensing/registration was required. The date of the landfill works predates the 1999 EU Landfill Directive regulations. WEtherefore believe that there is a danger that any disturbance would be health hazard due to the unknown materials.

GBC has installed gas monitoring wells on site since July 2000. One well recording methane gas discharge.

A Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005-Identifies the proposed site as GBC recorded landfill site Ref GU/11/LLC with type of waste not identified. The date of the landfill works predates the 1999 EU Landfill Directive regulations. WEtherefore believe that there is a danger that any disturbance would be health hazard due to the unknown materials.

A Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005-Identifies proposed site GBC recorded landfill site Ref GU/12 with type of waste identified as “unrestricted”. This causes concern as to what it does contain and the dangers if disturbed.

An Envirosearch Report RS1100201_1_1 dated 17th February 2004 and historical map data and information from GBC has identified the site as landfill and has “areas of

potentially contaminative industrial activities" and "potential risk from landfill gas migrations". Development of this site would be a health hazard.

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10 Policy A46 –Land between Normandy and Flexford

Response – GGG objects to this policy

Do you consider this section of the plan legally compliant? NO

Do you consider this section of the plan is sound? NO

Do you consider this section of the document complies with the Duty to Cooperate?
YES

This land is located with land parcel H12 as identified in GBCS Vol IV. The land is DEFRA agricultural land Grade 3A and has been farmed traditionally for pasture (sheep and cattle) and for grain (wheat and barley) in perpetuity. The land contains many stands of scheduled Ancient Woodland. It is contended that the land contributes to the 'openness' of the Green Belt between the settlements of Flexford and Normandy and should remain 'washed over' by the Green Belt.

Legal Precedent

We object to the removal of the land allocated to Policy A46 by removal from the Green Belt by "inset" under NPPF para 83 and 84. We believe that current case law militates against the removal of land by the re-drawing of Green Belt boundaries without the express presentation in the written Local Plan of the "exceptional circumstances" proposed to redraw the Green Belt boundary for the land in Policy A46. We draw attention to the following cases

- *Gallagher Homes Ltd v Solihull Borough Council [2014] EWHC 1283 (Admin), Hickinbottom J*
- *IM Properties Development Ltd v Lichfield DC [2014] EWHC 2440 (Admin), Patterson J*
- *Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council [2015] EWHC 1078 (Admin), Jay J*

In the Solihull BC decision in particular

"Exceptional circumstances are required for any revision of the boundary, whether the proposal is to extend or diminish the Green Belt. That is the ratio of Carpets of Worth.

Whilst each case is fact-sensitive and the question of whether circumstances are exceptional for these purposes requires an exercise of planning judgment, what is capable of amounting to exceptional circumstances is a matter of law, and a plan-maker may err in law if he fails to adopt a lawful approach to exceptional circumstances. Once a Green Belt has been established and approved, it requires more than general planning concepts to justify an alteration."

We contend that no "exceptional circumstances " for such re-drawing of boundaries have been offered by GBC in the context of the Local Plan process, so how can residents judge the veracity of this proposal?

Guildford Borough Settlement Profiles (July 2013) & Settlement Hierarchy (May 2014)

We object to the use of a 2010 survey of parishes that was not represented to parish councils as to be part of the Local Plan evidence base in an attempt to present the two settlements as one so as to better suit the pre-determination evident in the council

officer's thinking even at this early stage in the consultation. It is recognised in the Settlement Hierarchy that Flexford and Normandy are separate settlements, neither rank highly based on their individual sets of community facilities and services (Normandy 13, Flexford 27 sustainability ranking in Settlement Hierarchy report). It is disingenuous to represent them as a combined community. The ward contains five hamlets in a dispersed area. There is no traditional community centre. The incorrect assessment in the Settlement Profile document has been pointed out under Regulation 18 consultation but the council continues to include this flawed document as evidence. It should be discounted and removed from the evidence base.

Use of educational provision as "exceptional circumstances"

We object to the proposed site of Normandy/Flexford (Policy A46) for a new Secondary School; this should be rejected as the need for such a school in the location has not been proven.

In its last submission to GBC (July 2014) Surrey County Council, in its official response, said: "A site within the proposed urban extension at Blackwell Farm, with all necessary access infrastructure built in and a catchment surrounding the site, would be a more sustainable location in transport terms for a new secondary school to serve the western side of Guildford." Why has GBC not heeded this advice?

Every neighbouring secondary school is currently undersubscribed, Kings Manor in particular with 57% of its school places currently unoccupied. The birth rate which rose in 2011 and 2012 has reduced for the last two years, so building new schools now is a mis-direction.

GBC in the Infrastructure Delivery Plan, May2016 indicate that SED 3, IDP p87, a 7-form entry (7FE) secondary school at the Normandy / Flexford strategic development site, requires only 1 FE to serve the development site itself, the remaining capacity would serve the wider area, including Blackwell Farm site (Policy A26). However, given that the proposed Blackwell Farm development is for 1,800 dwellings, on a pro-rated basis of children of secondary school age within the arising population, this would only require a maximum of 2FE. Together, the Blackwell Farm site and the Normandy/Flexford site require only an estimated 3 FE provision. The proposed school is excessive in size, being more than twice as large (7FE) as the estimated need (3FE), and as other information provided here indicates, this is well within the funding and expansion capabilities of existing schools in the western wards of Guildford borough and the western side of the town.

The addition of forms of entry [FE] to current schools will be a much more cost effective and sustainable in the long term if there is a reduction in need – an empty classroom is cost neutral in terms of annual budgets, but an empty school is unsustainable, having spent millions of Pounds of Department of Education capital budget creating it, it would be a huge waste of money.

Adding forms of entry to several existing schools will see the costs absorbed after the initial capital cost needed to create a few extra rooms – but they still only require one headteacher, one set of staff etc. The Head Teacher and Chairman of Governors at Ash Manor School have offered to co-operate with a programme to expand that school, as had the Principal at Kings College - although now undersubscribed significantly, if it needs expansion in the future there is space and a willingness to do so.

If GBC wishes to proceed with this proposal, SCC Education Officers need to demonstrate a clear and undisputed need for such a school at this location, given the current under-subscription of all the neighbouring local secondary schools surrounding Normandy.

It should also set out how such a new school will be financed. If not, the site should be rejected.

Undersubscribed Secondary Schools

Kings College, Guildford

The school is currently 57% undersubscribed. The capacity at the school is 900 pupils, and there are only 389 on the school roll (43% utilised) with 511 vacancies. Kate Carriett, Principal at Kings College has said very clearly: "There is absolutely no need for another school in Guildford, its crystal clear". She also said that when Kings College is fully subscribed, there is capacity on that site to further expand the school, to accommodate more pupils well into the 2020's if then needed.

The New Guildford University Technical College

This is due to open in 2018, and will take 240 pupils from the age of 14 in its first year, and that will double to 480 places, relieving pressure on other schools.

Christ's College, Guildford

This school is already taking 30 more pupils a year than its admission number, because it has the space and capacity to do so, and is willing to take more still as it has further capacity

Ash Manor, Ash

The capacity of the school is 1,050 and it has 940 pupils, so is undersubscribed by 110 places. The Head Teacher and Chairman of Governors are quoted as saying that if needed they are supportive of the school being expanded to take more pupils by 30 places a year (so a total of an extra 150). They also expressed very strong concerns about a new school in Normandy, just three miles from their front door, and the possible negative effects on Ash Manor.

Connaught School

This is near Ash, just over the County Boundary in Hampshire - but is also undersubscribed by 90 places and available to Surrey children.

Hoe Valley Free School, Woking.

This brand new Secondary school only opened last September. It has an intake of 120 per year, with currently 95 pupils, so is undersubscribed in its first year by 25. But it will build up with 120 new places available every year for 7 years - making a total capacity of 840. It has no catchment area, and although will mainly serve Woking, will welcome applications from Guildford parents.

Consequently, there are currently 736 vacancies at the nearest secondary schools serving the western parishes - not accounting for the 480 extra at the new Technical College to open in 2018 - a combined capacity of 1,216. In addition to those, SCC has already approved expansions at the County School, Guildford and St Peters.

The birthrate in Guildford has fallen over the past two years and whilst it's too early to know if that trend will continue, it is another factor to urge caution, and not to proceed at this time.

The case for a new secondary school in Normandy is therefore not proven. If there is such a need elsewhere in Guildford Borough, we don't believe it is needed in the location proposed at Normandy.

Contribution to the Purposes of the Green Belt

We object to the express overriding by GBC of the contribution the land proposed for Policy A46 makes to the 5 purposes of the Green Belt in response to a developer-led proposal for large-scale house building in the Green Belt

The evaluation of the 'land parcels' in and around Normandy and Flexford is laid out in the tables in GBCS Vol 4. The 'land parcel' that contains the land proposed for Policy A46 is H12, evaluated against 4 purposes of the Green belt it performs as follows:

- Checks sprawl of Normandy and Flexford
- Prevents Flexford and Normandy from merging
- Assists in safeguarding the countryside from encroachment

Guildford Borough Council recognises the contribution the land surrounding and within the settlements of Normandy and Flexford makes to the five purposes of the Green Belt in identifying land parcels H10, H12, H13, H14, H15, H16, J16 and J17 of particular sensitivity in its re-evaluation of the land parcels in the Green Belt & Countryside Study, Vol 2 Addendum, Appendix 1 and 2, reinforcing the evaluation in GBCS Vol 1

Contribution to ‘openness’ of the Green Belt

We object to the express rejection by GBC that the land proposed for Policy A46 fails to contribute to the “openness” of the Green Belt.

In the case of Normandy and Flexford, there have been two planning appeals concerning Gypsy pitches (Palm House Nurseries and Green Lane East) where the inspector agreed that land near Flexford and land to the west of Glaziers Lane exhibited ‘openness’. The inspector found in favour of the appellant on other grounds but the opinion on ‘openness’ in those judgements is evidence that the land around Normandy and Flexford is considered by the Planning Inspectorate to exhibit ‘openness’. A third more recent decision at appeal for housing development at North Wyke Farm found that the land contributed to the “openness” of the Green Belt.

- Palm House Nurseries GBC 09/P/01851, Application 12 November 2009 Appeal Ref: APP/Y3615/A/10/2131590 Decision 24 Feb 2011
- Green Lane East GBC 10/P/00507, Application 8 March 2010 Appeal Ref: APP/Y3615/A/10/2140630 Decision 14 June 2011
- North Wyke Farm GBC 14/P/00779, Application 17 April 2014 Appeal Ref: APP/Y3615/W/15/3002308 Decision date: 14 July 2015

Impact on Surrey Hills AONB

The land designated as AGLV and identified as 12-1 in the Map AONB Boundary Review - Recommended Areas for Consideration and pp28-29 AONB Area of Search Evaluation - Natural Beauty Evaluation, Oct 2013 report to be added to the Surrey Hills AONB reinforces the proximity of valued landscape as it will add the north slopes of the Hogs Back overlooking Flexford settlement to the very boundary of Flexford settlement at Flexford Road.

Further, the land allocated in Policy A46 contains unrestricted view of the Hogs Back, part of the Surrey Hills AONB. Recent case law establishes that views out from open land to an AONB are as important as views into land overlooked by an AONB. Surrey Hills Management Board (of which GBC is a member) has submitted proposals to Natural England for land currently with local designation Area of Great Landscape Value on the north slopes of the Hogs Back above Wanborough and stretching down to Flexford Road at the southern boundary of Flexford settlement to be subsumed into the AONB and is currently awaiting ratification. The future potential presence of in excess of 1,000 houses visible at the periphery of the AONB with associated urbanising infrastructure (e.g. roads, perpetual street lighting, general light pollution, loss of ancient hedges and trees etc.) would do great harm to the views into the AONB from the land between Normandy and Flexford and from the Surrey Hills AONB.

Therefore it is concluded that ‘land parcel’ H12 is Green Belt land that contributes to the ‘openness’ of Normandy and Flexford settlements also contributes to the ‘openness’ of the surrounding country side and adjacent Surrey Hills AONB. Consequently, both settlements should remain ‘washed over’ by the Green Belt as stated in NPPF para.86 “If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt”.

Thames Basin Heaths SPA

We object to the assertion that the creation of SANG will protect the rare ground-nesting bird species on this SSSI and Natura 2000 site from major disturbance and predation introduced by the building of 1,100 dwellings that will rise to hundreds of adults and children, vehicles, dogs and cats within 1 kilometre of this internationally important wildlife habitat. Policy P5 is concerned mainly with how to support large scale housing development in close proximity to the SPA than with protecting wildlife habitat and

biodiversity. It fails to address appropriate Monitoring Targets for unregulated vectors of disturbance generated from large-scale housing development within the 400m-5km mitigation zone.

Natural England is the government agency that champions the conservation of wildlife throughout England. They have advised the eleven local authorities with land in the Thames Basin Heaths, that new housing within 5km of the SPA may harm the rare bird populations. Larger developments located between 5km and 7km of the SPA may also be affected. This harm can be caused by disturbance to the birds from a growth in the number of walkers, cats and dogs frequenting the heathland, and other recreational uses created by additional housing.

The 2012/13 visitor survey report commissioned by Natural England on behalf of the Thames Basin Heaths Joint Strategic Partnership Board showed not a static or falling number but a 10% increase in visitor numbers since 2005:

- 66% cited dog walking as the main activity
- 80% of interviewed groups had dogs
- 67% of interviewed groups had dogs which were seen off lead
- 39% specifically visited the SPA site was because it was 'close to home'
- the average distance travelled was just over 2.5 kilometres (80% by car)

Only 1% of visitors accessed the TBHSPA from the Normandy/Flexford direction, so the additional disturbance caused by the building and then occupation of 1,100 homes by 2,000-3,000 residents and 1,250 additional vehicles will be significant. Importantly, the prevalence of dog walking in the visitor survey suggests that the currently available SANG in the borough is ineffective in attracting those wishing to exercise dogs away from the TBHSPA.

Simply claiming that the 2012 visitor study data indicates success of the avoidance strategy in drawing people away from the SPA is no evidence at all. Where is data based on measurement of visitor numbers to the available SANG within Guildford borough? Where is the evidence that SAMM programmes have any impact on the behaviour of residents that are dog owners? This would be more compelling evidence. Without it, a planning inspector has no means of finding the proposal of large-scale housebuilding at these sites sound. In response to an email from NAG, Natural England have admitted that no survey evidence exists of the effectiveness of SANG or SAMM programmes in directing dog-walkers away from TBHSPA in Guildford borough or any of the surrounding local authorities.

A survey of households carried out by a veterinary team at Bristol University in 2010 "Number and ownership profiles of cats and dogs in the UK" published in the Journal of The British Veterinary Association indicates 31% households own dogs and 26% households own cats. Dogs were more likely to be owned by rural households.

Creating 1,100 homes on Green Belt land between the settlements of Normandy & Flexford implies, on average, 340 dogs and nearly 290 cats; all housing to be located within 1 kilometre of the SSSI; for a dog owner, a 2-minute drive or 10 minute walk away. The proposed SANG schedule in the Infrastructure Delivery Plan, May 2016 (IDP, SANG 13 p84) gives indication of neither the physical size nor location of bespoke SANG for Policy A46 (LAA Site 368); it is estimated that this proposed open space will be unable to cater adequately for 340 additional dogs plus their accompanying owners and there will be significant 'leakage' onto the TBHSPA.

11 Policy A47 – Land west of The Paddocks, Normandy

Response – GGG objects to this policy

Do you consider this section of the plan legally compliant? NO

Do you consider this section of the plan is sound? NO
Do you consider this section of the document complies with the Duty to Cooperate?
YES

We object to the proposal that the land that contains the majority of an SNCI should be proposed for housing development.

The National Planning Policy Framework (NPPF) states that "The purpose of planning is to help to achieve sustainable development" and it describes three "dimensions" relevant to this aim: economic, social and environmental. The explanation for how the environmental aspect plays a role includes the statement "...helping to improve biodiversity, use natural resources prudently...." This is a quote from point 7 of the section dealing with achieving sustainable development, in the NPPF.

In the section headed "Conserving and enhancing the natural environment" (section 11), it is stated inter alia that planning policy should protect and enhance valued landscapes and minimize impacts on biodiversity providing net gains in biodiversity wherever possible to halt the overall decline in biodiversity, by promoting "the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations.....".

Guildford Borough Council (GBC) interprets the NPPF through their 'Policy I4' which emphasises the commitment to biodiversity stating: "The Council will conserve and enhance biodiversity and will seek opportunities for habitat restoration and creation, particularly within and adjacent to Biodiversity Opportunity Areas (BOAs)".

Proposals for development must demonstrate how they will deliver appropriate net gains in biodiversity. Where proposals fall within or adjacent to a BOA, biodiversity measures should support that BOA's objectives. The Supplementary Planning Document (SPD) will set out guidance on how this can be achieved. European sites designated as Special Protection Areas (SPAs) and Special Areas of Conservation (SACs), National Sites of Special Scientific Interest (SSSIs), local SNCIs and Local Nature Reserves are all shown on the Policies Map or as subsequently updated.

Policy I4 goes on to say that "Permission will not be granted for proposals that are likely to materially harm the nature conservation interests of local sites unless clear justification is provided that the need for development clearly outweighs the impact on biodiversity."

The majority of the site covered by this part of the development is designated as an SNCI and lies within an area identified as a 'Water Vole Alert Area' as identified by the National Water Vole Database and Mapping Project in 2012.

It is shocking that an SNCI should be considered a suitable site for development, particularly given the statements in the NPPF (Para 109) and Policy I4. We find it a telling insight into the very low value that GBC places on biodiversity and wildlife.

12 Policy A49: Land rear of Palm House Nurseries, Normandy

Response – GGG objects to this policy

Do you consider this section of the plan legally compliant? NO
Do you consider this section of the plan is sound? NO
Do you consider this section of the document complies with the Duty to Cooperate?
YES

We object to the "insetting" of the land proposed for Policy A49. By proposing to 'inset' this site an 'island' urban site would be created, removing the 'openness' of this Green Belt land confirmed in the judgement of the Planning Inspectorate and similarly judged in the evidence of the GBCS Vol.4. We propose this land should continue to be "washed over".

Legal Precedent

We object to the removal of the land allocated to Policy A46 by removal from the Green Belt by “inset” under NPPF para 83 and 84. We believe that current case law militates against the removal of land by the re-drawing of Green Belt boundaries without the express presentation in the written Local Plan of the “exceptional circumstances” proposed to redraw the Green Belt boundary for the land in Policy A46. We draw attention to the following cases

- *Gallagher Homes Ltd v Solihull Borough Council [2014] EWHC 1283 (Admin), Hickinbottom J*
- *IM Properties Development Ltd v Lichfield DC [2014] EWHC 2440 (Admin), Patterson J*
- *Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council [2015] EWHC 1078 (Admin), Jay J*

In the Solihull BC decision in particular

“Exceptional circumstances are required for any revision of the boundary, whether the proposal is to extend or diminish the Green Belt. That is the ratio of Carpets of Worth.

Whilst each case is fact-sensitive and the question of whether circumstances are exceptional for these purposes requires an exercise of planning judgment, what is capable of amounting to exceptional circumstances is a matter of law, and a plan-maker may err in law if he fails to adopt a lawful approach to exceptional circumstances. Once a Green Belt has been established and approved, it requires more than general planning concepts to justify an alteration.”

We contend that no “exceptional circumstances” for such re-drawing of boundaries have been offered by GBC in the context of the Local Plan process, so how can residents judge the veracity of this proposal?

Contribution to ‘openness’ of the Green Belt

There is no legal definition of ‘openness’ but it is specifically expressed in NPPF para. 79 that appears as the first paragraph in “Section 9 Protecting Green Belt Land”; ‘openness’ is matter of opinion and that opinion is often expressed in the decisions of Planning Inspectors when assessing a planning appeal.

In the case of Palm House Nurseries the inspector agreed in 2011 that land to the west of Glaziers Lane exhibited ‘openness’. The inspector found in favour of the appellant on other grounds but the opinion on ‘openness’ in those judgements is evidence that this land around Palm House Nurseries is considered by the Planning Inspectorate to exhibit ‘openness’.

Palm House Nurseries GBC 09/P/01851, Application 12 November 2009 APP/Y3615/A/10/2131590 Decision 24 Feb 2011

“Openness

15. The Secretary of State agrees with the Inspector's assessment of the impact of the proposals on the openness of the Green Belt at IR99-100, and his conclusion at IR101 that there would be considerable harm in this respect. For the reasons given at IR101, the Secretary of State also agrees with the Inspector's conclusion that the development would result in some limited harm to one of the five purposes of including land in the Green Belt identified in PPG2, namely that of assisting to safeguard the countryside from encroachment (IR101). ”

Green Belt & Countryside Study, Vol. 4

In the Green Belt & Countryside Study Vol 4, Land parcel H10 that contains the Palm House Nursery site was judged the fulfil three essential purposes of the Green Belt
1. Checks sprawl of Normandy

2. Prevents Normandy, Wood Street Village and Flexford from merging
3. Assists in safeguarding the countryside from encroachment

13 Policy A50 Whittles Drive, Guildford Road, Normandy

Response – GGG objects to this policy

Do you consider this section of the plan legally compliant? NO

Do you consider this section of the plan is sound? NO

Do you consider this section of the document complies with the Duty to Cooperate?
YES

We object to the “insetting” of the land proposed for Policy A50. By proposing to ‘inset’ this site an ‘island’ urban site would be created, removing the ‘openness’ of this Green Belt land confirmed in the judgement of the Planning Inspectorate and similarly judged in the evidence of the GBCS Vol.4. We propose this land should continue to be “washed over”.

Legal Precedent

We object to the removal of the land allocated to Policy A46 by removal from the Green Belt by “inset” under NPPF para 83 and 84. We believe that current case law militates against the removal of land by the re-drawing of Green Belt boundaries without the express presentation in the written Local Plan of the “exceptional circumstances” proposed to redraw the Green Belt boundary for the land in Policy A46. We draw attention to the following cases

- *Gallagher Homes Ltd v Solihull Borough Council [2014] EWHC 1283 (Admin), Hickinbottom J*
- *IM Properties Development Ltd v Lichfield DC [2014] EWHC 2440 (Admin), Patterson J*
- *Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council [2015] EWHC 1078 (Admin), Jay J*

In the Solihull BC decision in particular

“Exceptional circumstances are required for any revision of the boundary, whether the proposal is to extend or diminish the Green Belt. That is the ratio of Carpets of Worth.

Whilst each case is fact-sensitive and the question of whether circumstances are exceptional for these purposes requires an exercise of planning judgment, what is capable of amounting to exceptional circumstances is a matter of law, and a plan-maker may err in law if he fails to adopt a lawful approach to exceptional circumstances. Once a Green Belt has been established and approved, it requires more than general planning concepts to justify an alteration.”

We contend that no “exceptional circumstances ” for such re-drawing of boundaries have been offered by GBC in the context of the Local Plan process, so how can residents judge the veracity of this proposal?