

## **Points raised during the Spatial Strategy session for response by the Council**

At the end of each hearing session I have been giving the Council the opportunity, if they so wish, to respond verbally to the points made by participants. A large number of points were raised during the two Spatial Strategy sessions and it was not realistic to expect the Council to answer them on the day.

I have therefore produced from my notes a list of the essence of the comments made during those sessions. I have grouped the points by subject, regardless of who made them. The purpose of this note is to invite the Council to respond to the points if they wish. *Please note: these are not formal Inspector questions to the Council.*

This note cannot cover all the points made; it is simply a brief summary of those that seem to me to relate most closely to the issue of the Spatial Strategy. Given that these were high level sessions, I have avoided mentioning sites or site-specific concerns as far as possible.

As these are not my formal questions, but a summary of participants' comments, I leave it to the Council to consider the nature of its response, but I would suggest a concise written response containing appropriate references to key documents.

### *1. The overall approach to exceptional circumstances*

Should the plan seek just to meet demographic need, rather than employment, students and unmet need in the housing market area, so as not to take up any Green Belt land? How can these "add-ons" give rise to exceptional circumstances justifying Green Belt release?

### *2. The overall balance of development*

Won't the combination of the allocations along the A3 amount to major sprawl?

Has the whole plan been built around strategic sites rather than sustainable ones?

Is there an imbalance of development, with too much to the east of Guildford?

### *3. Delivery timing*

If the plan delivers the majority of its homes in the last 5 years, and is unable to meet early years needs adequately, is the spatial strategy wrong?

### *4. The settlement hierarchy*

In selecting sites, did the Council pass too quickly down the settlement hierarchy? Did it move the goalposts to avoid conclusions it didn't want and get to the outcome it wanted?

Should there be much more attention to Tiers 1 and 2 of the hierarchy? Should the Council have demonstrated that they had explored a range of mechanisms to deliver urban sites before they could demonstrate exceptional circumstances to remove land from the Green Belt?

How could a major Tier 9 site be put forward when there are clear opportunities for development further up the settlement hierarchy?

### *5. The town centre and urban areas*

For exceptional circumstances to exist to release land from the Green Belt, shouldn't it be clearly demonstrated that all opportunities for development in the town centre have been exhausted? Isn't the residential capacity of the town centre much higher than the Council states? How is it that the GBCS looked at potential residential development sites but such an approach does not appear to have been done for the town centre?

Does the plan rely too much on additional retail in the town centre, limiting the opportunity to provide many more homes where both young and old people want to live? Isn't the North Street redevelopment site within the Council's gift to deliver homes early in the plan period?

Should the plan pay more attention to improving the environment in the town centre?

Should the spatial strategy pay greater attention to deprived parts of the urban areas?

Shouldn't the Council be emphasising the need for the University to intensify the use of its sites before new Green Belt land is taken? Areas of surface car parking could be developed.

### *6. Edge of Guildford urban area*

Should there be greater focus on housing and employment sites adjacent to the urban area of Guildford, which are inherently more sustainable?

Should more attention be given to expanding existing housing and employment sites and allocations rather than taking Green Belt land remote from the main urban area?

### *7. Edge of Godalming*

Should sites adjacent to Godalming be considered as they are adjacent to a town with a range of facilities and transport links? Have such sites been wrongly classified by the GBCS as "adjacent to a village"?

### *8. Village allocations and insetting*

Is the proportion of homes allocated to villages too small? Should the Council consider development adjacent to villages as the best way of boosting the delivery of homes within the first 5 years from adoption? Should villages close to Guildford be given favourable consideration?

In giving villages a lower position in the hierarchy, has the plan failed to recognise that some are sustainable and have a range of transport facilities and local shops?

Were village classifications too simplistic (eg the presence of a garage determining whether a village was classified as "large"?)

In seeking to boost homes in the first 5 years, should the Council focus on settlements that have existing sustainable transport links?

How can major housing and employment allocations be made in a location with infrequent bus services?

Will insetting villages erode their character and lead to too much infill?

Has insetting led to illogical GB boundaries?

### *9. Transport*

Is the plan over-reliant on A3 RIS-dependent sites?

Did the transport assessment adequately consider local road networks? Will A3 congestion result in re-routing along unsuitable roads? Is the SHA's conclusion regarding highways impact reductive?

Are claims for modal shift arising from the sustainable transport measures exaggerated?

### *10. The GBCS*

Was the GBCS approach too coarse-grained in looking at the whole parcel in relation to the Green Belt and paying insufficient attention to the contribution that individual sites made? Should the potential for mitigation have been investigated before ruling sites out?

As all Green Belt purposes are equal, was it wrong of the GBCS to score sites lower if they fulfilled one or two GB purposes? What if a site meets one GB purpose strongly?

Was the GBCS wrong in equating defensible boundaries with high sensitivity Green Belt? Has the plan chosen too many sites with non-defensible boundaries?

### *11. Landscape*

Has the plan applied the wrong approach to AONB? In addition, is the plan contradictory in its policy towards AONB and AGLV – are candidate AONB sites different from AGLV as a whole?

Was the setting of the AONB adequately considered?

### *12. Heritage assets*

Was the GBCS in error by extending the Green Belt purpose relating to historic towns to other heritage assets such as conservation areas and historic parks and gardens?

### *13. New Green Belt*

Is separation between the Ash and Tongham urban area and Ash Village achievable with a green buffer and ordinary development management policies?

*14. Water management*

In the plan, is the issue of water management (in all its forms), and its related infrastructure, paid adequate attention?

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