

**Guildford Borough Local Plan: strategy and sites****Matters and Issues for Examination (part 1)****Preamble**

It is important to read the accompanying Inspector's Note which sets out details of the organisation of the Examination and the hearings.

The questions below are the key Matters and Issues that relate to the Plan's soundness. Together with my associated comments, they should be addressed by the Council and other relevant parties in their hearing statements. They do not address every aspect of the plan; only those issues that I need to know more about at this stage. I have already raised with the Council (in my Initial Questions) a number of soundness issues relating to detailed policy wording, and the Council's proposed revised wording is expected in due course.

After the hearing statements have been received and the number of participants is known, I will issue an agenda for the hearings with approximate timings. If I consider that any matter has been satisfactorily addressed in the written statements it will not be included in the agenda for the hearings. The questions below are therefore likely to be refined and/or reduced in extent for the hearings.

A number of landowners and developers seek to promote sites that have not been allocated in the submitted plan. It is the purpose of the Examination to consider the soundness of the submitted plan, not to consider sites that have not been allocated ("omission sites"), so time will not be allocated to omission sites in the hearings. However, the overall soundness of the spatial strategy will be scrutinised.

From my reading of the written evidence it appears that the Council has satisfied the Duty to Cooperate and that the plan has met the legal requirements in respect of compliance with the Local Development Scheme and the Statement of Community Involvement. As regards climate change mitigation the Council will be responding to Item 33 of my Initial Questions in due course. I have not therefore included these within the list of Matters and Issues.

## **Matters and Issues**

### **1. Plan preparation**

- 1.1 Is the Sustainability Appraisal adequate?
- 1.2 Has an appropriate Habitats Regulations Assessment been undertaken and is the plan's approach towards the Thames Basin Heaths Special Protection Area sound?
- 1.3 Can the Council demonstrate that it has exercised the Public Sector Equality Duty adequately in the preparation of the plan and the formulation of its policies?

### **2. Calculation of the Objectively Assessed Need for Housing (OAN)**

Are the calculations contained in the West Surrey SHMA Guildford Addendum Report an appropriate basis for establishing the OAN for Guildford? Relevant elements include:

- 2.1 Migration trends and unattributable population change.
- 2.2 Student migration and its impact on the housing market.
- 2.3 Market signals and the issue of housing affordability.
- 2.4 The need for affordable housing.
- 2.5 Employment growth.
- 2.6 Any other relevant matter.

### **3. Unmet Need in the Housing Market Area (HMA)**

Is the plan sound in not making any allowance for unmet need arising elsewhere in the HMA? Relevant aspects include:

- 3.1 The allowance of 83 dpa already contained within the Waverley Local Plan.
- 3.2 The constraints imposed by Green Belt and other designations, and the fact that it appears necessary for the plan to

release substantial sites from the Green Belt in order to meet its own identified OAN.

3.3 Any other unmet need issues.

#### **4. Housing Trajectory**

Is the plan's housing trajectory, which starts at a low level and rises towards the later years of the Plan period, a sound basis for meeting housing need? Relevant topics include:

4.1 The ability or otherwise of increasing the rate of delivery in the early years.

4.2 Whether the housing trajectory is realistic and deliverable, and whether there are any identifiable threats to delivery.

4.3 The key infrastructure improvements influencing the housing trajectory.

#### **5. Five Year Housing Land Supply**

5.1 Is the methodological basis for calculating the 5 year housing land supply sound? (The Council's calculations are based on a 20% buffer, the Liverpool methodology and a rising trajectory – see 3.50 of the Council's response to initial questions.)

5.2 How many years' supply of deliverable housing land exist at present, having regard to the housing trajectory, the current supply position, and the plan's housing allocations?

5.3 Is the plan resilient and flexible enough to maintain 5 or more years' supply of deliverable housing land going forward? (See Appendix 7 of the Housing Delivery topic paper).

#### **6. Homes for All**

Are the plan's policies sound and effective in delivering a wide variety of quality homes to provide for the needs of all the community? Relevant issues are:

6.1 The plan's proposals in respect of a mix of sizes and types of home, including family homes and homes for older people.

- 6.2 The delivery of affordable homes (having regard to Item 14 of my Initial Questions).
- 6.3 The provision of accessible homes.
- 6.4 The provision of specialist accommodation.
- 6.5 The provision of student accommodation.
- 6.6 Sites to meet the accommodation needs of Gypsies, Travellers and Travelling Showpeople.
- 6.7 Houses in multiple occupation.
- 6.8 Self-build and custom homes.
- 6.9 Rural exception sites.

## **7. Meeting Employment Needs**

- 7.1 Does the plan provide for an appropriate amount of land and floorspace for business purposes, and is the plan effective in its approach to new employment development? (See also Item 28 of my Initial Questions.)
- 7.2 Is the plan justified in the extent to which it protects employment land and floorspace?

## **8. Retail and Service Centres**

- 8.1 Is the plan's approach towards Guildford Town Centre realistic and effective having regard to changing retailing patterns? (See Items 5, 6 and 31 of my Initial Questions.)
- 8.2 Is the plan's approach to changes of use in all centres justified on the evidence and necessary?

## **9. Spatial Strategy, Green Belt and Countryside Protection**

This is a section on the soundness of the spatial strategy and the overall approach to Green Belt and the countryside. Site-specific matters, including local Green Belt and landscape issues, will be dealt with separately in relation to the individual sites.

9.1 Is the spatial strategy as set out in the preamble to Policy S2 sufficient to explain the plan's approach to the overall distribution of development and guide future development during the plan period?

9.2 Having regard to the need for housing, does the plan direct it strategically to the right places? Relevant aspects are:

- The spatial distribution of existing and future need for housing
- Movement patterns
- Green Belt and landscape impact
- Infrastructure provision and constraints.

9.3 Are the proposed new business land and floorspace allocations in the right strategic locations? Relevant aspects are:

- The spatial location of existing and future needs
- Movement patterns
- Green Belt and landscape impact
- Infrastructure provision and constraints.

9.4 Having regard to the extent to which it is proposed to release Green Belt land and develop greenfield sites, do the plan's policies strike the right balance (in terms of housing provision) between the use of urban and previously developed land and urban extensions? Has the potential for further residential development in the urban area been adequately explored? (See also Item 5 of my initial questions.)

9.5 Having regard to 9.2 to 9.4 above, are the overall amount of land proposed to be released from the Green Belt, and the strategic locations for Green Belt release, justified by exceptional circumstances?

9.6 Does the plan take a sound approach towards the inseting of various villages from the Green Belt?

9.7 Taking into account the extent of housing, employment and other needs, does the plan take a sound approach towards the protection of the landscape, including the AONB and AGLV, and the countryside generally?

9.8 If the Plan had to accommodate a greater housing requirement, for example through a higher OAN, what would be the implications in terms of the spatial strategy?

9.9 What are the reasons that have led the Council to propose including new land in the Green Belt around Ash and Tongham, and can the circumstances be regarded as exceptional? What are the implications for the future housing needs of this Urban Area?

## **10. Built Environment and Heritage Assets**

10.1 Is the plan effective in respect of the promotion of good urban design on all sites, but especially on its major strategic allocations? (See Item 9 of my Initial Questions.)

10.2. Is the plan sound in respect of its approach to heritage assets? (See Item 34 of my Initial Questions.)

***(Continued – Site Allocations begins on the next page)***

## **11. Site Allocations**

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

11.1 Could the plan be more ambitious in the number of dwellings it might achieve on these sites? Should site A8 be residential?

11.2 Should the plan allow for student accommodation on any of the above sites, given the proximity to the University?

### ***A15 (Land at Guildford Cathedral)***

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

### ***A22 (Land north of Keens Lane, Guildford)***

11.4 What traffic and access issues arise in respect of the site and what measures are proposed in relation to them?

11.5 How is it intended to deal with the proximity to the SPA? What are the exceptional circumstances at a local level that justify the removal of this site from the Green Belt?

### ***A23 (Land North of Salt Box Road, Guildford)***

11.6 Is the allocation for a burial ground on site likely to affect the nearby SSSI? Are measures likely to be necessary to prevent detrimental effects?

### ***A24, Slyfield Area Regeneration Project***

11.7 What are the key stages and points of infrastructure provision in respect of the site?

11.8 Given the need for major infrastructure interventions, is the timing and scale of the anticipated delivery from this site realistic?

11.9 How are the infrastructure costs to be funded?

11.10 What potential impact would the costs of infrastructure have on viability, deliverability and the provision of affordable housing on the site?

***A25, Gosden Hill Farm, Mellow Lane, Guildford***

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

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

11.13 Are there local level exceptional circumstances that justify the release of this site from the Green Belt?

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

***A26, Blackwell Farm***

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

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

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

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

11.19 Are there local level exceptional circumstances that justify the release of this site from the Green Belt?

***A29, Land South and East of Ash and Tongham***

11.20 How would road traffic be handled from these sites, especially having regard to the railway line and the narrow lanes and streets?

11.21 Are the site allocations too large or is there scope for a greater number of new homes in this location, being land beyond the Green Belt?

11.22 Having regard to the different areas and land parcels involved in this allocation, should the plan say more about protecting and enhancing the character of the existing Ash and Tongham urban area and Ash Green villages and creating attractive and cohesive settlement(s)'

***A33, University of Law***

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

***A35, Wisley Airfield***

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

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

11.26 The site is on a rise, with extensive views. How would the visual impact of the scheme be handled?

11.27 How would the site access be handled?

11.28 What is the relationship of this site to the A3 infrastructure improvement works?

11.29 What would be the pattern of movement from the site? How could the plan effectively promote more sustainable transport modes?

11.30 What is the timing of the key infrastructure works for this allocation and their relationship to the delivery trajectory for the site?

11.31 Can the plan's provisions effectively prevent an adverse impact on the SPA?

11.32 How much of the site is considered to be brownfield land?

11.33 Are there local level exceptional circumstances that justify the release of the site from the Green Belt?

***A43, Land at Garlick's Arch, Send  
A43a, New North-facing Slip Roads on the A3  
A58, Land adjacent to Burnt Common Warehouse, Send***

11.34 Are there local exceptional circumstances that justify the release of this land from the Green Belt? In combination with the allocation at A25, Gosden Hill Farm, (see 11.14 above), is there a risk of a significant diminution of the Green Belt in this locality? Can the perception of the eastward sprawl of the wider Guildford urban area along the A3, and the encroachment into the undeveloped gaps, be avoided?

11.35 Would the developments proposed in these allocations integrate with the village or would they be separate entities?

11.36 What steps would be taken to ensure that they promoted sustainable development and sustainable movement patterns?

11.37 What are the anticipated movement patterns arising from the new slip roads in combination with the housing and employment allocation, taking into account the potential for a redistribution of traffic from the strategic road network (notably from the east towards Woking), and what would their effects be on the roads through Send, including traffic flow, noise and air quality?

***A44: Land west of Winds Ridge and Send Hill***

11.38 What would be the traffic impact of this development on the road serving the site?

11.39 What would be the effect of the scheme on the amenity value of the footpath network passing through the site?

11.40 Are there exceptional local circumstances that justify the release of this site from the Green Belt?

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