

# **Guildford Borough Local Plan: strategy and sites**

**Submitted by Jennie Kyte**

## **Matters and Issues for Examination (part 1)**

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

The G.L. Hearn report is still not transparent, and the over-high and flawed OAN figure causes much concern.

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

#### **3.2 The constraints imposed by Green Belt and other designations, and the fact it appears necessary for the plan to release substantial sites from the Green Belt in order to meet its own identified OAN.**

Green Belt constraints should be applied to lower the OAN figure as well as on individual sites.

### **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?**

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

It was wrong to use villages by insetting them to increase the rate of delivery of housing before a brownfield site list had been made and included in the Draft Local Plan. Exceptional circumstances have not been proved.

### **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 sites and types of home, including family homes and homes for older people.**

Areas with a mix of houses in Guildford of two to four bedroom houses are losing their mix of sizes due to large extensions on small houses suitable for families or older people. Inevitably this will happen on new estates unless there are conditions put in place.

#### **6.2 The delivery of affordable homes (having regard to Item 14 of my Initial Questions).**

Some affordable homes have been built on the former Bellerby site (formerly owned by GBC) close to the town centre, but a far greater number of affordable homes were originally proposed. Instead a Waitrose supermarket with a large open car park was built on the site.

The culture of building unneeded retail and open car parks needs to change. Car parks should be built, wherever possible, underground, underneath buildings, or as two-storey car parks that are attractively designed. Existing open car parks could also be modified to free up space for more housing. Guildford, a gap town needing space, should plan such infrastructure for the future to enable space to be used more efficiently.

## **6.5 The provision of student accommodation.**

Residents' needs should be considered. Students rent many small houses which are suitable for low income families. Students should be accommodated on land for which the University has already permission to build on and indeed promised to do so (Local Plan 2003). GBC appear to be unduly influenced by the University.

## **7. Meeting Employment Needs**

### **7.2 Is the plan justified in the extent to which it protects employment land and floorspace?**

Employment developments are very spread out in parts of Guildford, such as in Walnut Close, Ladymead and parts of Woodbridge Rd. Businesses could use land more efficiently.

## **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.**

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

#### **Green Belt and landscape impact**

There will be impacts on the Green Belt and landscape if the large amount of housing proposed is built. The Green Belt which surrounds the town (also containing AONB) has perhaps the greatest influence on the character of Guildford, much of which is surrounded by countryside and villages. This character is much prized by those who live in Guildford, who had believed in the Green Belt as a constraint, and it is much loved by visitors.

Landscape around villages is important. Sprawl or one over-large mansion could blight a village.

Views across open Green Belt countryside seen from cars by those driving along approach roads to Guildford will be harmed by inappropriate development. Guildford will become part of linear development rather than surrounded by Green Belt.

The countryside is very accessible. At present almost everyone in Guildford is within walking distance of countryside and it is free to those on low incomes. As housing is built on the

Green Belt, it becomes more distant for residents who live on some estates in the town who normally access it on foot. Accessible open space is important for well-being, health and recreation. Passages with a rural character should be built within developments to link them to older communities and allow greater access across new estates to the countryside.

### **Infrastructure provision and constraints**

The central bus station in North St is very necessary for those coming into Guildford from the villages to shop or spend a day in the town. Its loss at a time when more people will be living in rural areas and when a modal shift is needed is very damaging, and a backward step regarding infrastructure. (Its position in North St allows it to serve retail in both the High St and in North St.)

The bus station is being redeveloped to accommodate more retail and to make the redevelopment of North St viable. It could instead be built over with shops and the rest of the site used to generate housing, which in turn would support the High St and add to the vibrancy of the town.

### **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?**

The release of such large swathes of land in the Green Belt is not justified by exceptional circumstances. Building schools in large estates does not constitute exceptional circumstances when the schools would not have been needed if the estates had not been built in the first place.

Extending Green Belt boundaries during the Local Plan process, although allowed under Exceptional Circumstances, was not expected to allow for unmet housing need, especially the large amount put forward in the Guildford Local Plan.

If 'Exceptional Circumstances' is unmet need, the Green Belt has no meaning.

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

Villages are washed over by the Green Belt to prevent them from joining together and without this protection, they are in a much weaker position. Very strong policies are needed to keep spaces between villages open and to prevent sprawl and over development.

### **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?**

The protection of views into and out of the AONB and AGLV should be strongly written into the Local Plan, as it was in the 2003 Local Plan. Blackwell Farm with its AONB and AGLV land should be protected. A road running through the AONB would be harmful.

**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?**

Guildford is a gap town with hills and constraints. Many of its town and rural streets in the borough, are narrow and shaped by ancient landscape. A higher OAN would further cram the town and destroy countryside, damaging landscape and increasing traffic congestion.

Villages are separated and protected from the A3 by the Green Belt alongside it. Ribbon development along the A3 could eventually join up with villages nearby and gaps along the A3 be filled.

Loss of countryside and heritage can happen little by little for what seems very good reasons at the time, only for the loss to be realised too late. Such a large loss of countryside all at one time, could perhaps be the beginning of the villages and Guildford merging together, and over time becoming suburbs of London.

**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.)**

The insetting of villages will have a detrimental impact on the Green Belt. The building of 800-900 houses (equivalent in number to a major development) on the approaches to villages will impact on a wide area, rather than being contained within one site. As with any larger site, the design of houses need to be of the very highest design and in keeping with village settings. Large gated mansions built around villages to provide a negligible amount of affordable housing would be a failure of the Local Plan.

Transferring urban design suitable for towns into the countryside is inappropriate and damaging to rural landscape.

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

Strong protection should be given to Guildford's Victorian heritage which enhances the town and which it is easy to lose bit by bit without realising the overall detrimental impact on the town. The ancient parts of the town are protected, but other architecture in areas surrounding the town centre also needs protecting. Villas and houses post 1900 are also important and are gradually being lost. The last piece of Art Deco heritage in Guildford will disappear when North St is redeveloped.

**11. Site Allocations**

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

### **11.11 Is the delivery trajectory on this site affected by any of the A3 improvement proposals?**

The Gosden Hill Farm site should be kept to allow for the option of a future entrance for a tunnel for a widened A3, which would bring the two halves of Guildford together with great environmental benefits as well as creating new space. The possibility of an A3 tunnel should be kept open, even though the A3 tunnel option was deleted from the last draft of the Local Plan (Reg.19, 2017).

This site will also impact on the green open views on the approach to Guildford. It will be linear development in the Green Belt along a road leading from Guildford en route to London and vice versa. It dismantles the purpose of the Green Belt.

Developers are now hoping to develop further along the A3.

### **A26 Blackwell Farm**

The Hog's Back is one of two hills rising from either side of the River Wey. Blackwell Farm on the Hog's Back is besides an approach road to Guildford, which is bordered by countryside. It is an expansion of the town in a very sensitive area. Gradually farms, such as Manor Farm and now Blackwell Farm are being swallowed up and the land urbanised. Land adjoining villages and communities nearby is consequently being eyed by developers, who now believe that the Green Belt is there to be built on.

Blackwell Farm is partly AONB land with Ancient Woodland. A road running through it would harm the AONB. Exceptional circumstances have not been proved.