



Campaign to Protect
Rural England
SURREY BRANCH

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

Hearing statements by The Surrey Branch of the Campaign to Protect Rural England (CPRE Surrey)

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

The West Surrey SHMA Addendum Report, March 2017 gives Guildford Borough an OAN figure of 637 dwellings per annum. We believe that this is excessive, unjustified and unsustainable. CPRE Surrey wishes therefore to endorse the conclusions and recommendations in the report on the Guildford OAN prepared by Neil McDonald for the Guildford Residents Association, which argues that the OAN figure is exaggerated and does not reflect the Borough's real housing need.

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

CPRE does not consider that the Plan should make allowance for unmet need arising elsewhere in the HMA. Our reasons are summarised below.

3.1 CPRE Surrey is the claimant in a statutory challenge of the decision by Waverley Borough Council to adopt its Local Plan: Part 1. The challenge is being made on the grounds that it was unreasonable and/or inexplicable as to whether the Inspector had considered the effects of so doing on the constrained and protected sites in the Borough. Woking and Waverley boroughs are similarly constrained by the London Metropolitan Green Belt (both have around 60% Green Belt land) but in Waverley's case it is further constrained by also having a large portion of the Surrey Hills Area of Outstanding Natural Beauty (AONB) within the Borough, which Woking does not. These significant constraints – Green Belt and AONB – have been ignored in the allowance of a further 83 dwellings per annum in order to accommodate Woking's supposed unmet need.

CPRE believes that the Green Belt and AONB should not be sacrificed to accommodate another, far less constrained, borough's unmet need. Furthermore, the selection of boroughs in any particular housing market area is arbitrary – Woking, Waverley and Guildford happen to fall within the same housing market area (West Surrey Strategic Housing Market Area) for the purposes of calculating the objectively assessed need (OAN) figure, but, equally, any of them could have fallen into a different HMA with different assessments, outcomes and figures.

CPRE applauds Guildford Borough Council for having responded so robustly to Question 2 stating that Woking's unmet need should be met within the Plan period and so before 2026/27; and that Guildford cannot sustainably meet or accept any additional growth within the timeframe in order to accommodate Woking's unmet need.

Guildford will find it hard to meet its own housing delivery targets within this period without having additional housing numbers imposed upon it arising from a neighbouring authority's unmet need. It is neither reasonable nor consistent with achieving sustainable development to require Guildford to release further Green Belt sites without a consideration of Woking's own Green Belt capacity first. Woking Borough Council is required to review its Core Strategy, which was adopted in the wake of the publication of the National Planning Policy Framework (NPPF) in 2012 and is out-of-date. This will provide the opportunity for Woking to consider afresh its unmet need and where it can be accommodated.

CPRE considers that it would be folly to anticipate the outcome of the statutory challenge to the Waverley Local Plan in the High Court. We are not alone in challenging Waverley's adoption of their Local Plan on this very point. If the duty to cooperate has been satisfied then no local authority should be obliged to accept the unmet needs of their counterparts. In the absence of regional or county-level development plans, the Duty to Cooperate is the only mechanism open to borough and district councils for any kind of strategic planning. The views of these councils, which result from them having undergone due process, must be respected.

The Plan should be the local community's plan and not a collection of edicts and targets imposed upon it. Guildford is constrained by Green Belt and AONB, as well as by severe shortcomings in its infrastructure. It is hard-pressed to meet its own housing needs let alone that of its neighbours. It is totally inconsistent with any notion of sustainability to expect Guildford to give up more of its protected countryside in the Green Belt to accommodate Woking's unmet need.

4. Housing trajectory

4.2 CPRE does not believe that Guildford's OAN is deliverable. Being dependent on the large housebuilding companies, whose record of delivery is very poor, we have serious concerns that genuine housing need (the right houses in the right places) cannot be met. Provision of affordable housing is heavily reliant on developers' viability assessments, and invariably these are used by developers to reduce the proportion of affordable housing within their housing schemes after planning permission has been obtained. Only if viability assessments are undertaken *before* applications are lodged can a realistic view be taken of delivery of the affordable housing that is required.

It is of great concern to CPRE that the 'big 10' housebuilders have effectively monopolised the housebuilding market, while small local building companies (which are proven to be better at delivering the type of housing that is needed) are not being given sufficient opportunities to build. The Local Plan fails to take proper account of the issues which are of national and regional scope and which the current Government consultation on its revised National Planning Policy Framework is seeking to address.

9. Spatial Strategy, Green Belt and Countryside Protection

CPRE Surrey has serious concerns about the soundness of the Spatial Strategy and the Plan's overall approach to the Green Belt and countryside.

9.1 - 9.2 We believe that GBC has adopted an *unbalanced* approach to the development requirements of the Local Plan, placing too much development pressure on the Borough's Green Belt and countryside, with insufficient brownfield and urban development opportunities. We strongly agree with the hearing statements and consultation submissions by the Wisley Action Group and Save Hogs Back and by parish councils covering the rural areas of the

Borough including Artington, Compton, East Horsley, Effingham, Send, Shalford, Wanborough, West Clandon, West Horsley and Worplesdon. We also refer the Inspector to CPRE Surrey's detailed submissions in 2016-17 as part of the Regulation 18 and 19 consultations on the Local Plan which highlighted our concerns about the pressures on Guildford's rural areas from the scale of development proposed by GBC's Plan.

CPRE strongly supports the principle of localism and believes that parish councils should have a bigger voice in planning. Unfortunately, a recent decision taken at Secretary of State level regarding the Howard of Effingham School within the Guildford Borough follows a contradictory approach and serves to undermine local democracy. The decision was to allow a development to proceed that is against the majority wishes of the community as expressed in the Effingham Neighbourhood Plan and by democratic decisions of both Guildford Borough Council and Effingham Parish Council. As a result of the decision, there will be a significant loss of Green Belt land to development, and the village will grow in size by approximately a third. We understand that a decision on the development of Wisley Airfield, following last year's public inquiry, is expected to be made by the Secretary of State while the Guildford Local Plan hearings are taking place; we hope that the Effingham experience will not be repeated for Wisley, with local opinion from the rural parts of the Borough being swept aside once again.

We do not consider that the current Plan is sustainable. We believe that the soundness of the Plan is seriously undermined by the inadequacy of existing infrastructure, which is not adequately able to meet current community requirements. Additional housing development on the scale envisaged, concentrated, as the Plan proposes, on the rural areas, will, we believe, promote infrastructure breakdown at a time of current financial austerity that restricts investment. Nor is this just a matter of road congestion with its associated air and noise pollution. The Environment Agency has made clear in its publication of July 2013 that water supply throughout Surrey is classified as "seriously stressed". Additionally, sewage facilities in Guildford risk being overwhelmed by proposed development that would require a re-evaluation of the Hockford Sewage Works capacity and has to take into consideration the major changes envisaged at Slyfield.

9.3 CPRE recognises the need to maintain some employment land within the Borough but believes that the requirement for commercial business space will continue to decline. In particular we consider that GBC has misjudged the future retail needs of the Borough and has placed too great a reliance on an expansion of retail development at a time when online shopping is reducing the need for retail space.

There is currently a degree of uncertainty on business development in general and to changes in the retail world in particular. This is reflected in national and local media reports which have indicated growing apprehension about a number of companies with household names that are prominent in Guildford. Rumours about the possible relocation of Ericsson and Colgate Palmolive from Guildford have surfaced. There is speculation too about the future of Dennis Specialist Vehicles. Restaurant chains ranging from McDonalds to Loch Fyne and Prezzo have closed outlets in the borough. Department stores such as Debenhams and House of Fraser are under pressure. Well-known firms such as Field & Trek, Jaeger, Maplin Electronics and Moffats have moved out. The power of Amazon looms on many retail horizons.

Against this background it is perhaps worth considering whether more emphasis should be given to making high-density urban space in the town centre – some of which is owned by the council and currently reserved for business use – available for social and affordable housing rather than sacrificing greenfield sites.

9.4 We do not accept that the Plan strikes the right balance between the use of urban land and what are misleadingly termed “urban extensions” (in reality not extensions of the urban area but housing developments in rural areas at some distance from the urban centre). In our view these “urban extensions” are being used to shift population growth away from Guildford town centre, at the expense of the opportunity to revitalise the centre and to the serious detriment of the Green Belt and countryside in which these unsustainable developments are being placed. We support the statements by Parish Councils and by the Wisley Action Group and Save Hogs Back with regard to the urban extensions proposed for the strategic sites at Wisley and Blackwell Farm.

9.5 The amount of land proposed for release from the Green Belt is unjustified. We do not accept that “exceptional circumstances” permit loss of Green Belt on this scale and we would point to the numerous statements from the Prime Minister and other Ministers underlining the NPPF’s stipulation that housing demand alone would be “unlikely” to constitute exceptional circumstances for Green Belt loss. Indeed, we would argue that GBC has failed to demonstrate that the extensive housing developments proposed for the strategic sites at Blackwell Farm, Wisley, Garlick’s Arch and Gosden Hill would outweigh harm to the openness of the Green Belt and wider natural environment.