

Guildford Greenbelt Group¹

Supplementary statement - Response to Inspectors' Matters and Issues for Examination

This document is supplementary to original submissions from Guildford Greenbelt Group. It does not withdraw any arguments previously raised, but responds to the Inspector's queries. It directs attention to previous relevant material, highlighting re **soundness**.

We have asked to attend the Examination. We do not wish to substitute verbal submission for representations previously made, but to be available to discuss issues or challenge factual inaccuracies.

Headings are per the Inspector's Matters and Issues.

1. Plan preparation

Q1.1

See GGG comments esp on p6-7² re sustainability and 2016 comments pp 2-7³ re evidence. Local factors re sustainability are not addressed in the Plan, esp. given the proportion of borough land covered by special designations incl. AONB, SSSI, SPA, SNCI and Green Belt. The borough is not a typical area because of the level of protected landscape and natural environment locally; it requires special consideration re environmental sustainability which has not been done. Constraints should have been applied to OAN under NPPF /other guidance. This suggests the plan is **inconsistent with national policy** and is **unjustified**.

2. Calculation of the objectively assessed need for Housing

Migration trends We would refer to our 2017 comments on p.4, 6-7, 11-13 and our 2016 comments pp6-7, and pp19-23 indicating why we consider that the OAN is overstated.

Unattributable population change is overstated in the ONS forecasts. The ONS has already made one significant correction in its overestimate in relation to Guildford, noting a systemic error. In the 2011 Census, the population of Guildford measured significantly less than that which had been forecast by the ONS. On further investigation, the ONS believe this discrepancy was due to the under-reporting of overseas students returning home. GLHearn chose **not** to apply a factor to allow for this discrepancy. If they had, by their own calculations (see Table 22 on page 68 of the West Surrey SHMA Sept 2015) the housing need to allow for demographic indicators would have been reduced to 239 dwellings per annum (not 577 per annum as currently stated in the West Surrey SHMA).

Further, the model prepared by GL Hearn has hidden assumptions, which GL Hearn and GBC⁴ have declined to publicise, despite repeated requests from a number of parties including a formal appeal to the ICO by Ben Paton. As a result, the SHMA cannot possibly be replicated by a third party and therefore cannot be defended. It amounts to unsubstantiated assertion,

therefore cannot be a basis for planning policy, as **unreliable evidence**. Work done by two different independent commentators both suggest that the migration trends are overstated (inter alia), and the housing OAN proposed is too high.

Student migration As noted in our 2016 comments (p9), the ONS model depends heavily on a significant uplift in the number of students during base years for ONS modelling. This was during a time of historical significant expansion for the university, an expansion that is not an ongoing trend. Further, as is publicly recognised, students are included in migration numbers as if they are permanent incoming migrants requiring future housing but in fact in 95% of cases leave; a net systemic distortion recognised by ONS particularly relevant in university towns planning for housing.

See our 2016 comments p.32. 2001-11: population increased by 7482, of which students were 3723; net increase 3759; increase in dwellings 2692; new dwellings for new population increased proportionately highly but despite this, prices rose, dependent on macroeconomic factors beyond the control of the district council.

The housing target resulted in a target population increase of 4.5x the actual increase over a 10year period- a significant distortion. We support the views of Green Balance, (analysis prepared for CPRE), that it's unrealistic for the local housing market to increase the proportion of housing because of the number of students (who should be accommodated on campus, as is done by other universities: Oxford requires all increases in student numbers be accommodated on university premises; Cambridge houses all students). Given empirical evidence that ONS has overcalculated migration trends historically, leading to historic corrections, and that student numbers lead to a distortion in migration statistics, we would submit that the SHMA as a whole is overstated for the area, especially within Guildford.

Market signals: We consider that affordability is related to the overall housing market within the South East, and will not be affected by any local (borough-related) oversupply, which will just be absorbed by the regional level of demand. Realistic appraisal would reflect a housing market which extended across the home counties and included greater London. In the context of greater London, Surrey is relatively affordable. This can be reflected in planning by recognising that it is appropriate to apply constraints to the area (see above). In this context, the chart included in Guildford Borough Council's response⁵ on p.6, showing the close correlation between the housing market in England and Wales, the South-East and Guildford. Further we would support the observation by GBC on page 8 that Guildford, with an affordability ratio of 10.9, is more affordable than most of Surrey with its affordability ration of 12.0. As shown further, on Fig3 p.9 of the GBC response, Guildford is actually beating the trend of the South East and the West Surrey HMA in relation to house price-income ratio – while the impact is adverse, it is *relatively* a much flatter increase than in other areas.

Affordable housing: See 2016 comments on pp 24 and pp27-38. Note 2016 comments on p.31 providing evidence that Guildford is the most affordable borough in the local area with the exception of Rushmoor.

It is important, when assessing the cost and affordability of homes, to look at the median not mean price – see our 2016 analysis p.34 (the Guildford market is distorted by high value homes, so look at the large number of lower priced homes, not distorted mean). Commentators have challenged the definition that 80% of market price/rental costs represent a reasonable affordable basis.

Actual need within the borough is for smaller units, usually 1 or 2 bedroom homes for starter homes, downsizing elderly residents and key workers. The predominant need for such homes is in the urban area. See 2016 comments p.41-43 on sustainability of rural affordable homes as opposed to urban dwellings, and travel-to-work statistics as shown on p.42 based on the 2011 census. The need is of course for *dwellings*, not houses, but developers interpret this as a justification for building high-profit high-cost houses rather than smaller units, at a lower overall cost, that are required within this market. Unfortunately this interpretation has been applied by GBC, rather than calculating that an actual housing need could have been met, for a reasonable number of *dwellings*, within the urban area. The disregard for available brownfield and the choice to allocate commercial and retail properties to areas that could and should be zoned for housing is inexplicable, and suggests that the plan is unsound /**unjustified**.

Employment growth Both NMSS and Green Balance have suggested OAN is overstated in relation to the housing requirements of employment growth.

See our 2016 comments on p.57-61 re need for sustainable high added-value employment in this district, not land-hungry low-value employment.

Guildford is a growth area for high-tech businesses (gaming, space/satellite technology, 5G,etc) plus tourism/heritage - these are not land-hungry. They disproportionately enhance national wealth but do not require either high levels of population to support this effort nor substantial land. In fact, a beautiful countryside is more likely to support this area as attractive to such high-added value businesses, and a development strategy that is likely to cover the borough in suburbia is not likely to increase employment within the borough, therefore will not improve national wealth, nor require disproportionate levels of additional housing.

Other

As noted in 2016 comments, two independent expert analyses have arrived at a conclusion that the appropriate OAN that should be used as a basis, *before constraints*, was in the region of 500 dpa; this has now been revised by Neil McDonald suggesting that the appropriate OAN should be 409. We submit that this should then be amended by the constraints arising from the environmental factors pertaining here, and so should be constrained to a significantly lower number. The High Court in 2011 considered that GBC was justified in applying constraints on the grounds of its locality. We note that Woking Borough Council was permitted to apply constraints of 50% to its OAN, despite the fact that the land area in that borough is largely not SPA and not AONB. A 50% constraint level would therefore seem applicable for this borough, applied to a revised/recalculated OAN.

We would also note GBC's comments in relation to Woking's calculation of unmet housing need (q2), noting that this is overstated.

3. Unmet need in the Housing Market Area

As noted elsewhere we would question whether the Housing Market Area is appropriately drawn; and therefore if it is appropriate to consider whether it is the responsibility of Guildford (with a fragile and valuable environmental landscape, nationally recognised as significant) to meet the unmet needs of other areas which are less environmentally valuable on a national basis.

In any event, even if the Housing Market Area is regarded as justified, we would support the contention of GBC in this case (in its responses to point 2) that the assessment of Woking's unmet need is now considered to be overstated, and therefore there is less need that is required to be met.

4. Housing Trajectory

See also response to 5 below.

Infrastructure is a key concern, which should be regarded as an overall constraint on the housing number, not just in the early years of the plan (see our 2016 comments p3 re inadequate evidence for strategic infrastructure assessment). Infrastructure, including inadequate provision of medical resources/schools, power, sewage and water is an effective absolute constraint on housing. The infrastructure proposals are inadequate to deal with the proposed population increase.

That said, the Liverpool methodology does not seem inherently unjustifiable; a delay in early years' delivery before determining whether actual housing numbers proposed are in fact required (or might in fact be gross oversupply) is not an inappropriate response.

5. Five year housing land supply

If a more rational – constrained – OAN were adopted, GBC would have sufficient capacity, using available brownfield, windfall sites, relocation of students to campus accommodation, vacant homes, urban redesignation of commercial sites for housing and existing permissions – to meet all or most of its actual need.

On this basis there would be a 5-year housing supply to meet need.

Given the fragility of the local environment, this should be considered.

Note that GBC's estimates do not include historically accurate levels of windfall sites developed (in conflict with ministerial guidance); nor do they include any projections for developments within expanded settlement boundaries other than identified sites, another unrealistic underestimate. There is scope for huge levels of **over**provision.

It is however undeniable that *however* many planning applications are approved, only the developers can address actual development; so there should be penalties for non-development of extant permissions.

Given that there are 27.2 million dwellings in the UK (end 2017), with an average 2.38 people per dwelling, it is not clear that an aggressive housebuilding strategy is actually required.

If the higher housing target proposed by GBC is adopted, it is still important to recognise that the requirement is for *dwellings*, not houses. The need within Guildford is for homes for key workers, starter homes and homes for downsizing (see 6). These can be accommodated on a smaller land footprint than multiple executive homes. Release of Green Belt land is a developer-led initiative, not driven by need. It is believed GBC and/or SurreyCC own /control significant proportions of the brownfield land within the town, so it is not clear why slow assembly should be a justification for not building on brownfield; the lagged release should not be construed as an acceptable justification for release of strategic Green Belt or countryside sites.

6. Homes for all

Re homes for all see our 2016 comments pp23

6.1 As noted above the plan is imprecise about how it will enforce the mix of housing. It is likely that too many “executive” homes will be built, rather than the smaller, less expensive or genuinely affordable starter/downsizing/key worker homes that are actually needed within the borough.

6.2 We would agree with the Inspector’s comments in Initial Questions 14, and would agree that it is desirable to develop brownfield sites, both smaller and larger, as a priority. We would welcome anything that promoted such development.

6.3 Too many of the proposed housing sites are in rural areas which are inaccessible for public transport or served by inadequate public transport. Urban development is inherently more accessible and this should be the priority.

6.4 There is a need for a more specific allocation of the housing target to specialist accommodation especially in relation to the elderly/disabled. This is left unclear and the phrasing with policy H1 is aspirational not definitive. This housing is required and underpins the SHMA; however the risk is that the dpa will allow substitution of land-hungry executive homes rather than eg sheltered retirement allocation. We need precise and absolute targets by category.

6.5 Student accommodation could and should be provided on campus at very high levels; this is done by other university towns and the university has unbuilt permissions and land for student accommodation, is just choosing not to utilise this. We consider that a target of 50-60% as proposed by UniS and accepted by GBC is too low, and that the arguments presented by GBC are unconvincing.

6.6 These are required per legislation. It is important to ensure non-discriminatory provision of such homes. There is no requirement for this borough to provide a disproportionately high number of sites. Guildford does already have a significant number of traveller sites, we understand more than neighbouring boroughs.

6.7 HMOs should be subject to constraints; in this context we support Policy H1 but think that planning permission should generally be required for change to HMO status.

6.8 We consider that custom and self-build homes should be encouraged subject to design/building control guidelines and within normal planning constraints.

6.9 Re rural exception sites see our 2016 comments pp44-46. We would wish to see a revision of policy so that Rural Exceptions sites, both for normal housing and for travellers, are not permitted in the Green Belt.

7. Meeting employment needs

We consider that in fact the quantity of employment land reserved within the Plan is greater than required.

See p57-69 of our 2016 comments for comments; p57 on the poor classification between B classes; p59 in relation to the dramatic reduction in assessed demand between two Employment Land assessments in a 2 year period; p64 on the flawed nature of the evidence base as supplied, not providing a robust justification for actual demand, and therefore inappropriately reserving urban brownfield which could and arguably should be utilised instead for housing (eg Sites A5, A6, A7, A9) and also reserving land for warehouse capacity in Send (Site A43.58). See our 2016 comments pp68-69 re Surrey Research Park and its existing capacity to accommodate reasonable future growth. This view seems to be implied by the questions already asked by the Inspector in relation to employment on 23/3/18.

If existing urban land is used more efficiently (which does not imply high-rise, but high-density units both for commerce and housing) then the pressure to develop environmentally fragile Green Belt sites will diminish.

We do not consider that exceptional circumstances have been demonstrated that existing urban brownfield could *not* be used to meet actual needs, including employment, in full. Without this, it is unclear that there are any exceptional circumstances to develop Green Belt.

8. Retail and service centres

Changing retail is not recognised by GBC which has employed consultants to justify its retail strategy. National trends however are clear; see our 2016 comments on pp80-81 showing a clear decline in projections for retail within Guildford. On this basis, it seems unjustifiable to reserve large tracts of land for retail development within the urban area

which are adjacent to residential areas and could be used largely for residential purposes. The existing High Street, Friary Centre and Tunsgate are not wholly let and there is therefore existing current overcapacity; to privilege scarce urban brownfield for future retail development and not to zone such land for housing is inappropriate.

We do not agree with GBC that it is sustainable to preserve urban areas for retail development rather than use these for housing (p43 their response).

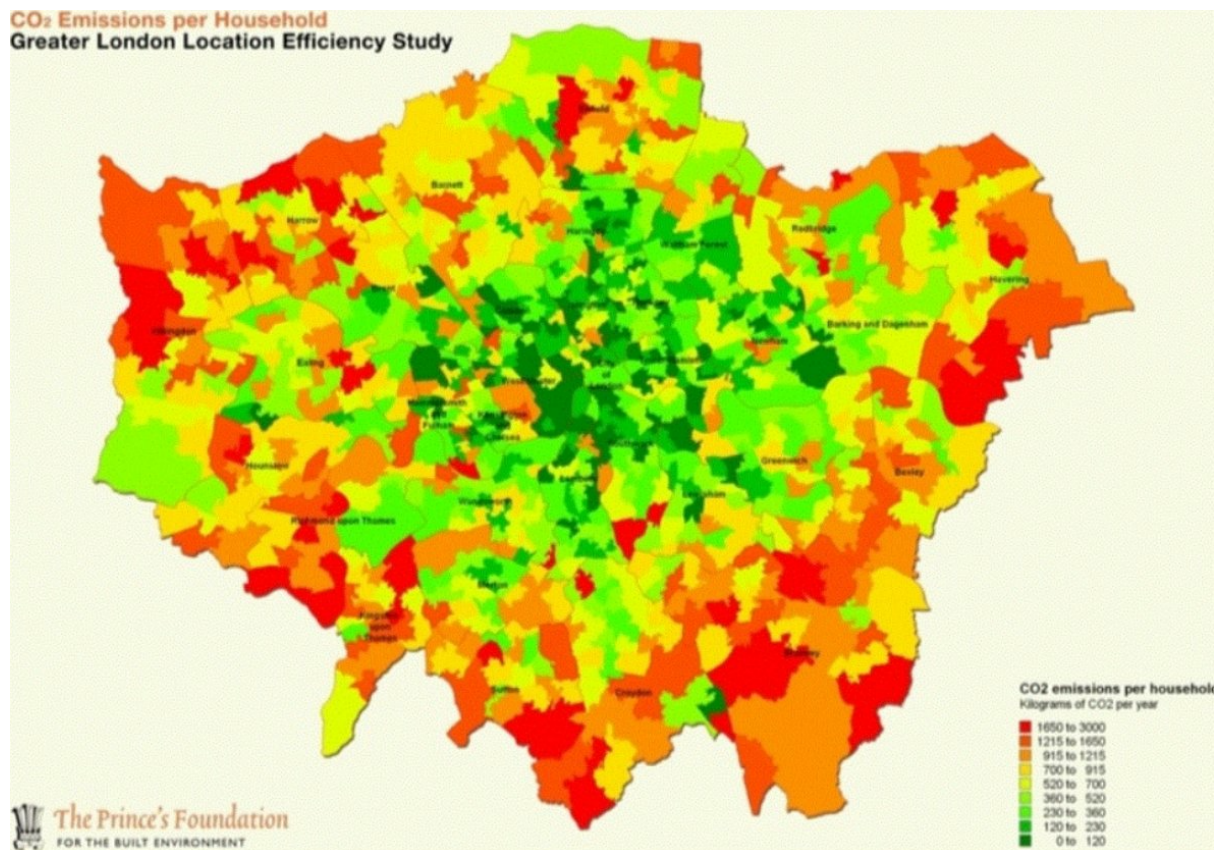
9. Spatial strategy, Green Belt and Countryside Protection

Q.9.1

Introduction 4.15-4.19 is imprecise, does not quantify allocation between Guildford town centre, urban areas and more rural locations including outside settlement areas. It does not clarify re where rural exception sites should be located and leaves open the option that these could be in the AONB or Green Belt. See comments p.2.

Precision is extremely important here in terms of defining acceptable and unacceptable areas for development within the plan. It is already very difficult to challenge aggressive planning incursions into Green Belt and AONB outside settlement areas on the current plan and there have been a significant number of anomalous decisions made. An imprecise plan here will become a Trojan horse for completely unrestricted development in a fragile and precious environment.

The impact on the environment of disparate non-urban housing growth is indisputably adverse, in terms of carbon footprint, air quality (not measured by GBC, and measures in place amended so evidence is incomplete/lacking), infrastructure. See chart re CO2 emissions and the fact that these are significantly higher in outer suburbs – the impact of longer commuting.



Absence of quantification suggests that plan is **unsound** due to lack of evidence.

Q9.2

See GGG comments on S2 and 2016 comments on spatial vision pp 10-11.

Spatial distribution – sustainable need for housing is best met within an urban context given urban employment/education facilities. Movement is best accommodated with access to rapid public transport (main rail line) and within the town where access to sustainable links (trams?/electric buses) may be efficiently provided . Green Belt within Guildford represents 89% of the area and AONB 44% and the impact of overdevelopment on both areas is underestimated by the plan- which is **inconsistent with national policy** to protect the Green Belt. Infrastructure within the area is a constraint which has not been fully addressed within the Local Plan. Water, sewage, power, roads, medical provision all inadequate for scale of development especially in the rural areas, and further provision is unfunded. Infrastructure, Green Belt and AONB should all constrain obligation to meet OAN, per NPPF. House of Commons Briefing Paper as noted in GGG comments: Planning for Housing no 03741, 14/6/2017. Guidance on taking account of constraints. “Need alone is not the only factor to be considered when drawing up a Local Plan”. Factors include “Green Belt”, “SSSIs”.

Q9.3

Too much impact from business land/floorspace allocation on Green Belt areas.

Unjustified. Should utilise available land in existing industrial/commercial parks. See GGG comments on P2, E1-E7, evidence base (p.4 following). See also 2016 comments on p. 69 indicating that existing land is sufficient for the plan period if used efficiently, and noting that the ELNA is flawed and **unreliable evidence** and so unsound. Unclear that there is real need for incremental retail capacity, and that the existing land allocations cannot deal with actual requirements for business allocation (currently relatively low density).

Q9.4

See prior GGG comments on E7 esp. p.33. Too few homes allocated to the town centre. Urban and PDL should be the emphasis- this is theoretically the case but in practice the allocation is heavily biased towards urban extension, extension of rural settlement and use of current Green Belt land (approx. 70% of new homes not on urban brownfield). Woodbridge Meadows, Walnut Tree Close and North Street hugely underutilised – potential capacity for ~7500 homes in the urban area which could prevent unsound/adverse use of Green Belt. (In addition windfall sites, land within settlements and higher density student accommodation on campus could help here). **Unjustified.**

Q9.5.

No. See prior GGG comments. **No** exceptional circumstances have been provided for this significant scale of Green Belt release. **Unjustified.** Without exceptional circumstances, and especially given the volume of available brownfield land in the urban area, and the unjustified overallocation of available brownfield land for retail, we consider the policy of Green Belt release to be unsound.

GBC notes (p21 of its response) that planned delivery is significantly above the required housing level, and also that of the key strategic sites, several are lagged beyond the plan period. It is acknowledged that with 89% Green Belt, 44-45% AONB and (outside the AONB) another significant percentage ~40% affected by SPA, Guildford's countryside is both valuable and fragile, so exceptional circumstances should definitely apply. The **only** justification given by GBC (p.17) for developing this fragile, precious countryside is unmet housing need:

At a strategic level, it was considered that the consequences of meeting only this proportion of Guildford's need constituted the exceptional circumstances to justify amending Green Belt boundaries.

Why therefore – given that there is **no** exceptional circumstance other than a spurious unmet need (which is refuted by GBC in its own documentation see q2-3) is there **any** consideration of amending Green Belt boundaries, especially allocating 70% of new housing (plus lagged development, so a **higher** amount) to Green Belt?

Q9.6

See GGG 2016 comments p12-13 on insetting of villages especially conclusions re spatial vision on p.42 of 2016 comments, showing extensive use of insetting (and locally aggressive promotion of development in Green Belt villages) is inherently environmentally unsustainable, and so unsound due to inconsistency with national policy. See also 2016

comments on policy D4 pp 88-93, noting the absence of the impact of inseting in the housing target. The housing target is therefore implicitly understating the actual number of houses that could be built in the borough, understating the impact on infrastructure, and giving a false justification for release of greenfield sites. The plan as it stands is **unjustified** and based **on flawed evidence**.

Q9.7.

See GGG comments on p. 19 expressing concern re diminution of existing protection for the AONB and 2016 comments on P1 pp45-48 and P2 pp48-50.

See also 2016 comments on E6 pp73-78 re the leisure/tourism importance of the natural environment, AONB and Green Belt which is disregarded for planning purposes.

The environmental impact of building on the Green Belt has not properly been considered, evidence has been ignored or distorted especially through flawed studies (GBCS etc).

The plan has an unsound approach towards all countryside and all landscape protection within the borough.

Q9.8 The borough is already suffering very severely from an overstated OAN which significantly exceeds the actual needs of the borough. It has been subject to historic correction for overstatement. As a result, any increase would be a perverse decision (especially to provide homes for Woking which is already overproviding against its own OAN). Were this decision to be taken, the impact on the fragile, beautiful and very threatened environment, including significant amounts of AONB including sites of national importance, would be appalling. The spatial strategy would result in increased congestion on roads, poorer air quality, stress on education, health and social care provision; stress on water, power and sewage.

Q9.9 Ash and Tongham has disproportionately suffered housing allocations on countryside due to the local status of countryside beyond the Green Belt. As a result, there is some argument for considering whether there should be protection to restrict coalescence of settlements. That said, this should not be at the expense of other areas which are losing Green Belt status; areas closer to London are more vulnerable still and need the Green Belt status more as a protection. Many of the areas where Green Belt status is threatened are of high landscape or agricultural quality so there should not be substitution here. Given pressures to develop within the borough, not justified by actual needs but by developer economic preference, there is an argument for extending the total Green Belt area within the borough. Provided no other Green Belt is lost, there is then an argument for extending this protection to the Ash and Tongham area.

10. Built Environment and Heritage Assets

We would endorse the Inspector's questions about the inadequacy of the proposed design guidelines within the Local Plan, especially for strategic sites. This has not been the subject of widespread public consultation nor even proper debate at Council level (GGG councillors have not been included in the working party on this, nor on any other aspects of the Local Plan). As a result, this cannot be considered to be **justified** or **consistent with national policy**.

In relation to heritage, we would refer to our 2016 comments both on pp16-17 (breach of NPPF in relation to sustainability), p73-78 on Leisure, referring to the fundamental error that tourism depends on building facilities, rather than making existing facilities open to tourists (both natural and heritage), and our comment p.87 that policies are in **breach of NPPF** 126-133 promoting development of rather than protecting existing heritage assets, which generally are in a reasonable state here.

11. Site Allocations

Prior comments on site allocations stand per the 2016 and 2017 consultations re all specific sites.

We consider that the allocation of Green Belt and countryside sites, including urban extensions, is not justified by the Local Plan.

We think the housing OAN number should be reduced (per above), and be subject to constraints. Then, if the allocation of new land for employment or retail within the town were reduced, we consider that available brownfield land (including but not limited to sites A5, A6, A7 and A8), together with windfall sites arising, sites within existing settlements, and substitution of accommodation on campus for students housed in the town, would be sufficient to meet all or the bulk of Guildford's real housing need. This would protect our environment and deliver the actual housing that is required for the area.

See also our 2016 comments p78-82 on needing to develop the urban area for housing, and the availability of brownfield – noting the Council approved this draft plan for submission to the Inspector before the publication of any brownfield register and without reference to available brownfield, presumably in response to GGG remarks that it could not be a justified submission without a brownfield register.

Summary

This Local Plan is substantially unchanged since the original Issues and Options consultation in 2013, and there have been small but not substantive changes since that early draft. This plan has apparently evolved from the **unsound** presumption, for whatever reason, that it is necessary or desirable to build on a significant amount of Green Belt, including the strategic sites in the Green Belt of Wisley, Blackwell Farm, Garlicks' Arch and Gosden Hill Farm. This presumption, needless to say, is in contravention of national policy, NPPF, NPPG and government guidelines.

Local people would support a properly constructed plan which first ascertained actual local requirements, considered the actual capacity of the local environment and existing and planned infrastructure (taking into account air quality and not relying on unbuilt, unfunded future schemes); and recognising that the real housing market area – the area in which people look for homes - should extend to the borders of Greater London and to the extensive brownfield sites of Bordon Whitehill which are currently undergoing major development. This is not the plan in front of us.

If one were to assume that this plan exists to justify Green Belt development, then this might explain

- the poorly evidenced OAN calculation which cannot be replicated and appears overstated
- revised OAN calculations after the first consultation constructed on a different basis giving a very similar end result
- GBC have refused to consider the need or justification for constraints
- GBC have refused to explain assumptions underlying population growth projections
- a new uplift in relation to the employment calculation in order to substantiate the number first thought of, or thereabouts
- an overstatement of the requirement for employment land in relation to urban brownfield
- proposal to inset Green Belt villages
- a disregard for available urban brownfield land within the Plan (the brownfield register was not prepared or available before the Council approved this draft for submission to the Inspector).

Without such a cynical interpretation, it is hard to see the logic behind some of the assumptions made in formulating this plan.

As a result, GGG submits that this plan should be radically (and rapidly) revised, noting that the housing numbers should be a) smaller and b) then constrained, brownfield should be used extensively, students could be housed on campus, and a large number of higher density, smaller units sited in the town could meet all or almost all actual housing need. This would mean that much less Green Belt would need to be sacrificed. Most actual local needs could be met sustainably and the countryside would not be gratuitously sacrificed to development.

5000 words

Footnotes

¹ This document is submitted on behalf of GGG, a group protesting about overdevelopment of Green Belt in the borough, and used group source material from previous consultations prepared by the committee. GGG has three elected borough councillors (2 for Send and 1 for Clandon/Horsley), but is responding as the protest group not the political entity. GGG is an opposition party; GGG has not been represented or involved in the Council Working Group on the Local Plan and is not supporting the Plan.

² All references to “GGG comments” or “comments” relate to GGG’s document *Objection to Regulation 19* dated 20/7/17, unless otherwise noted. Soft copy attached as Appendix 1 for ease of reference.

³ References to *2016 comments* refer to GGG’s document “*Objection to Regulation 19 Local plan* dated 15/7/2016”. Soft copy attached as Appendix 2 for reference.

⁴ GBC= Guildford Borough Council

⁵ The reference to Guildford Borough Council’s response are to the *Response to Initial Questions* published on the GBC website dated 10 April