

# PRP

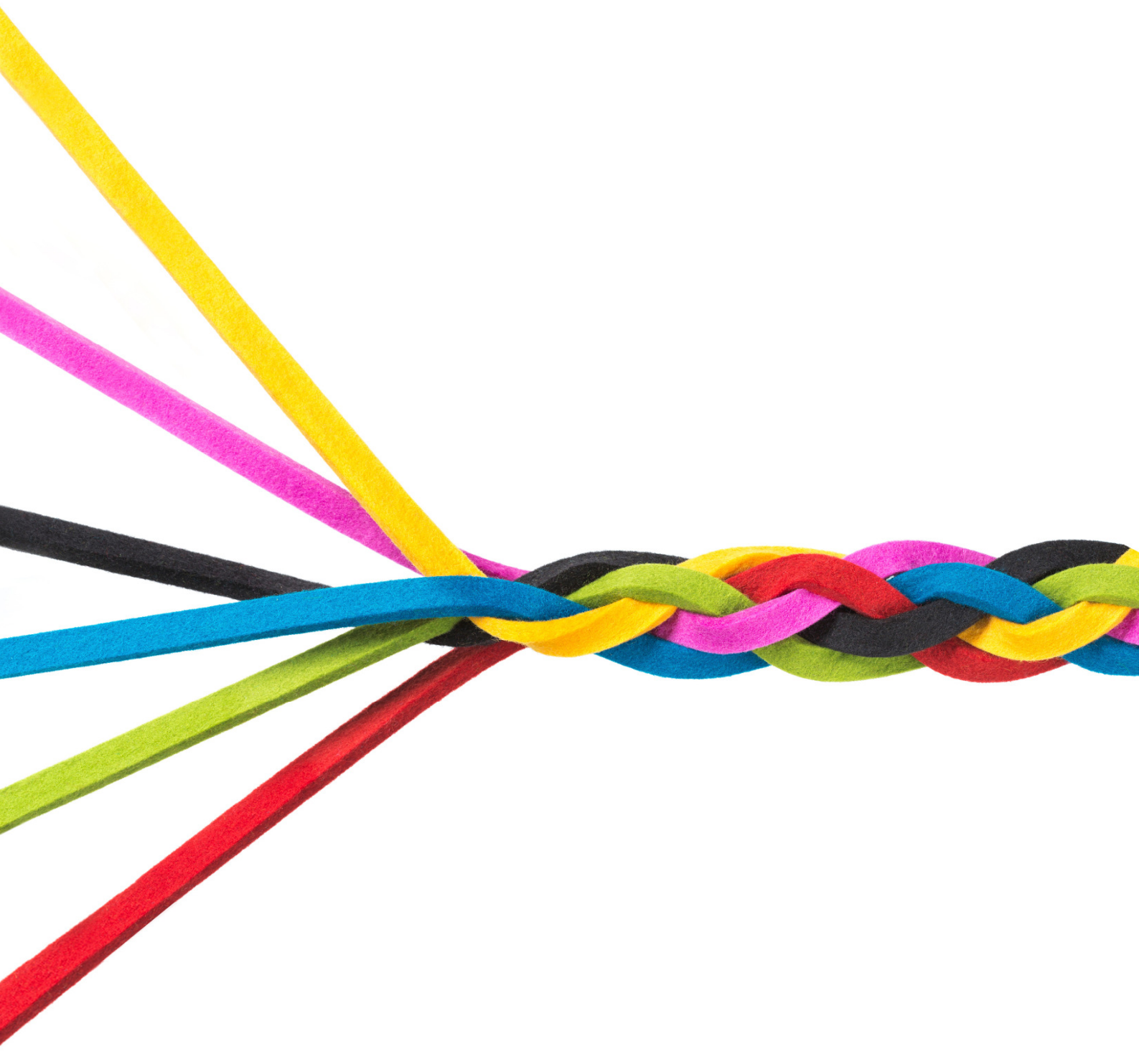


Guildford Vision Group

Guildford Local Plan Examination

Hearing Statement

May 2018



prp-co.uk

Architecture  
Urban Design  
Masterplanning  
Landscape  
Sustainability  
Project Services  
Planning  
Transport Planning  
Interiors  
Research

Project	Guildford Local Plan Examination
PRP Reference	AT6254
Location	10 Lindsey Street, London EC1A 9HP
Local Authority	Guildford Borough Council
Client	Guildford Vision Group
Issue	Final
Author	Andy Black
Date	May 2018

**Disclaimer:** This report has been prepared for the above named client for the purpose agreed in PRP's terms of engagement. Whilst every effort has been made to ensure the accuracy and suitability of the information contained in this report, the results and recommendations presented should not be used as the basis of design, management or implementation of decisions unless the client has first discussed with PRP their suitability for these purposes and PRP has confirmed their suitability in writing to the client. PRP does not warrant, in any way whatsoever, the use of information contained in this report by parties other than the above named client.

## Contents

<b>1. Introduction.....</b>	<b>4</b>
<b>2. Matter 4 - Housing Trajectory .....</b>	<b>7</b>
<b>3. Matter 6 - Homes for All .....</b>	<b>9</b>
<b>4. Matter 7 - Meeting Employment Needs .....</b>	<b>11</b>
<b>5. Matter 8 - Retail and Service Centres.....</b>	<b>12</b>
<b>6. Spatial Strategy, Green Belt and Countryside Protection.....</b>	<b>13</b>
<b>7. Matter 11 - Site Allocations .....</b>	<b>14</b>
<b>8. Conclusion .....</b>	<b>16</b>

## 1. Introduction

- 1.1 This written statement has been produced by PRP on behalf of Guildford Vision Group (GVG) in advance of the Hearing Sessions for the examination into the soundness of the Guildford Borough Local Plan: strategy and sites.
- 1.2 GVG has produced detailed representations throughout the consultation period for the Local Plan.
- 1.3 GVG has identified 17 key issues related to the town centre which require addressing and are set out within the GVG Masterplan (Appendix 1)
- 1.4 From these 17 issues GVG has set itself six key goals to transform the town centre:
  1. Wider pedestrianisation of the town centre
  2. Exciting new public space and a reinvigorated riverside
  3. Redirection of traffic away from the town centre
  4. An integrated road and rail hub
  5. More town centre housing
  6. A new bridge for a better East-West link
- 1.5 Sustainable, environmental and infrastructure solutions can be forthcoming but only realistically with comprehensive, integrated and master-planned solutions. The draft local plan fails to recognise or make a case for this, or any approach to capture and address any of the '17 issues' GVG has identified.
- 1.6 The draft plan proposes a Guildford with a quantum leap in shopping space that will be inaccessible due to inadequate transport provision. New housing is scattered around the edges of the town centre with inadequate provision made for transport and other facilities. Proposed employment centres may exacerbate transport difficulties e.g. more cross-town commuting.
- 1.7 The GVG proposals provide an opportunity to build an environmentally-friendly town centre, with the flexibility to optimise housing and commercial space.
- 1.8 A key ambition of GVG is to enable growth whilst delivering environmental quality for the community through a comprehensive, masterplan-led solution. GBC created a town-centre masterplan with Allies and Morrison which shares many of the aims of GVG. However, GBC have never adopted this or explained how it could be delivered. Moreover, the previous links to this masterplan which were contained in the previous draft of the Local Plan have been removed.
- 1.9 The current draft Local Plan fundamentally fails to consider how this can be achieved in the town centre, and indeed the wider borough.
- 1.10 These fundamental goals are central to this consultation response and are relevant to many of the specific policies contained within the submission version of the Local Plan.
- 1.11 The National Planning Policy Framework (NPPF) is very clear on the role which town centres have to play in the growth of boroughs:

*Local planning authorities should plan positively, to support town centres to generate local employment, promote beneficial competition within and between town centres, and create attractive, diverse places where people want to live, visit and work.*

*Local planning authorities should assess and plan to meet the needs of main town centre uses in full, in broadly the same way as for their housing and economic needs, adopting a 'town centre first' approach and taking account of specific town centre policy.*

- 1.12 The GVG Masterplan has been prepared to meet all stated criteria of the policies in the draft Local Plan, as well as meeting criteria to mitigate the 17 issues identified by the group. In addition, it has tested its masterplan to ensure that it is practical and deliverable. GVG has concerns, as detailed below, that the draft plan is not sound and will fail at the examination stage, with consequential impact on Guildford and its environs.



*Extract from GVG Masterplan - appendix 1*

- 1.13 Overall the draft Local Plan demonstrates reluctance by GBC to build new housing before infrastructure is provided. Whilst GVG understands this reluctance it does not demonstrate the forward thinking that is required for Guildford over the next 20 years. It does not provide solutions which GBC can begin to implement without fundamental reliance on external agencies (as is the case with much of the enabling infrastructure in the draft submission Local Plan). If the Plan is carried out as presented by GBC, there will be an increase in population in the wider borough with none of the associated increase in social or physical infrastructure that is required. The pressure that will be put on Guildford town centre from the growth of the borough, and indeed that of surrounding boroughs, will lead to excessive stress on the already-failing infrastructure in the town.
- 1.14 Through properly masterplanning the town centre, alongside a fundamental redesign of the physical infrastructure, the GVG Plan is able to deliver substantial additional benefits over and above just housing growth including business space, environmental benefits, tourism, leisure, power solutions, and flood defence.

- 1.15 GVG is therefore extremely concerned that the proper masterplanning of the town centre and the Area Action Plan for town centre are not being prioritised alongside the Local Plan and instead being delayed until after potential adoption of what GVG consider to be inconsistent policies.
- 1.16 The opportunity to deliver a world-class town centre can be achieved but requires a co-ordinated approach with all interested parties, involving the 4-5 landholders, including GBC, who own the town centre sites and in which the GVG Plan can play a part.
- 1.17 The inspector has set out key questions to GBC through the Matters and Issues for Examination (part 1) (ID/3) and this hearing statement sets out the position of GVG in relation to each of the key matters. Each relevant matter is set out as a separate section and the key questions asked by the inspector in ID/3 are set out in bold with the response of GVG against each one.
- 1.18 In preparation for the examination hearing sessions GVG has prepared a series of Statement of Common Ground (SOCG) documents with other key parties who will be submitting hearing statements and will be requesting to appear at the examination. These include:
- Guildford Borough Council
  - Guildford Society
  - Guildford Residents Association
  - Guildford Green Belt Guardians
- 1.19 GVG is firmly of the opinion that the plan is unsound. The evidence presented to the council by GVG has been systemically ignored and previous consultation responses not addressed adequately within subsequent drafts of the document. GVG request the opportunity to appear in person at the examination hearing session to enable the inspector to ask questions of key GVG members, their advisors and other key advocates as necessary.

## 2. Matter 4 - Housing Trajectory

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

**The key infrastructure improvements influencing the housing trajectory.**

- 2.1 The GVG masterplan demonstrates deliverability of key town centre brownfield sites across a wide area covered by the Guildford Town Centre area. In comparison to the GBC submission the GVG masterplan identified the potential for an additional 1,300 residential units (including North Street) (Appendix 2 - Comparison of GVG TCMP and GBC Submission)
- 2.2 Of the dwellings currently allocated in the draft plan these are split between 1,624 in the urban area on brownfield sites and 10,349 on sites outside the urban area (green field, green belt, and brownfield sites in the green belt) (appendix 3 - GBC Site Allocations). GVG contend that this ratio is symptomatic of GBC's failure to positively plan (and masterplan) town centre brownfield land, and is analogous of the approach which GBC has taken to the promotion of brownfield in the borough generally. The high reliance on sites outside of the urban area will result in critical pressure on the infrastructure of the borough which could be reduced by more appropriate brownfield sites being prioritised in the plan.
- 2.3 Of the allocated green belt sites the key threat to deliverability concerns the provision of infrastructure to mitigate the impacts of development. The particular constraints to delivery include the provision of substantial highway improvements and contribution towards SANG land.
- 2.4 GVG is aware of the position paper submitted by GSOC in relation to SANG land and is supportive of their position. As with GSOC, GVG also notes that the levy for SANG and SAMM on new homes adds considerably to their cost and that these contributions come ahead of affordable homes and so reduces funds available for much-needed affordable housing, and ultimately restricts housing development – particularly on urban brownfield sites.
- 2.5 GVG accept that some stepping of the housing trajectory is likely to be necessary as other infrastructure is provided. However, GVG has demonstrated that a co-ordinated masterplan for Guildford Town Centre which forms a central part of the Local Plan would have a positive impact upon the housing trajectory.
- 2.6 A key aspect of the GVG masterplan is the inclusion of a replacement transport corridor over the river and railway to alleviate key infrastructure constraints in the town centre. The crossing would relocate areas of road in the town centre where there are maximum conflicts with pedestrians into a safe, purpose built segregated transport corridor. It would also provide mitigation for allocated housing sites outside of the GVG masterplan area. The crossing can be front-loaded in the plan process and can be built off-line in order to minimise disruption to the town centre.
- 2.7 It is clear from the Consultation Statement from 2017 that GBC do not consider the new crossing to be a key infrastructure requirement. GVG disagree and ask the inspector to reconsider the critical requirement to resolve the issue of infrastructure, modal shift, pedestrian safety and quality of the public realm in the town centre through further scrutiny of GBC at the hearing sessions. GVG set out representations in the regulation 19 response in relation to the INRIX data which shows the town as (6th?) worst for congestion in the U.K. after the major conurbations. By delivering the improvements to key town-centre infrastructure, GBC can take control over the housing trajectory and deliver a higher proportion of the required housing in the earlier stages of the plan period.

- 2.8 Comprehensive masterplanning of the town centre through a joined up approach by GBC could also resolve place making , flood protection , cycle and pedestrian routes, power networks and other current issues in a way that no piece meal approach could ever solve.



### 3. Matter 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?**

- 3.1 A significant amount of the housing delivery as set out within the housing trajectory is delivered on greenfield and green belt sites (appendix 3). As already set out, and evidenced through the SOCGs that are submitted alongside this statement, GVG have demonstrated that this high proportion of non-brownfield sites is in direct contradiction with the brownfield first approach which is advocated by GBC in the Local Plan.
- 3.2 Other than the implications on infrastructure as previously highlighted by GVG, the principle issue with the high proportion of green field is the delivery of a higher amount of traditional housing on these sites. Whilst it is common ground between GVG and other parties that there is significant housing need across GBC, and the wider housing market area, this is not limited to family housing. Paragraph 4.2.3 of the GBC submission plan references the SHMA 2015 and Addendum Report 2017 and sets out the following requirements for homes across the borough as follows:
- *there is a need for 40% one bedroom, 30% two bedroom, 25% three bedroom and 5% four bedroom affordable homes*
  - *there is a need for 10% one bedroom, 30% two bedroom, 40% three bedroom and 20% four bedroom market homes*
  - *we have an ageing population with a significant projected growth in the over 65 year olds*
- 3.3 It is notable that there is a high requirement for smaller units of one and two bedrooms and older people's accommodation. This form of housing is much better suited to a town centre location and therefore the high delivery of dwellings on sites outside of Guildford Town Centre will not meet the needs as assessed in the SHMA.
- 3.4 The delivery of brownfield sites across the GVG masterplan area would inevitably deliver a much higher proportion of smaller properties including key-worker and shared-ownership affordable housing.
- 3.5 There is an established policy requirement for GBC to take into account the need for market signals (this is referenced in the HPF Hearing Statement) in regard to the significant affordability gap in Guildford. Whilst this is not a unique scenario in the south east, other similarly-constrained local authorities to Guildford have been subject to a further increase in housing requirement to address the market signals in the borough. It is clear that GBC have not had proper regard to this in the Local Plan. GVG is supportive of an increase in housing in the borough on brownfield sites which would address the chronic affordability problems faced by younger people and families in the borough.
- 3.6 There is also greater potential to provide homes through other forms of housing which are better suited for town centre locations such as Build-to-Rent housing, student accommodation (with links to the University of Surrey), and housing for older people (care homes, extra care and retirement living). This is not adequately addressed in the plan in its current form.
- 3.7 The other key part of the inspector's question is the word 'quality'. GVG has produced a quality masterplan which provides a significantly improved high-quality environment in the town centre including the opening up of the riverside area.

- 3.8 The fundamental issue of the current approach being advocated by GBC in the Local Plan is the lack of joined-up approach for the town centre. Allocating development sites within the town centre without the requirement for a masterplan will inevitably lead to lack of permeability between sites and a piecemeal approach being taken to the development of the town centre.
- 3.9 GBC set out in the Consultation Statement 2017 that GBC is *currently looking at proposals for redevelopment of the town centre, which may include a significant new green space alongside the River Wey in the town centre and other changes to open up access to the river. We will consider whether these proposals should be taken forward as part of a town centre Area Action Plan.*
- 3.10 It is therefore clear that GBC recognise the shortcomings of the current Local Plan in regard to the quality of the environment of the town centre, access to green space and the environment of the River Wey. Consideration of these in a future Area Action Plan is not an acceptable solution to what is a fundamental issue for residents of Guildford and must be properly addressed and secured at this stage of the Local-Plan process.

## 4. Matter 7 - Meeting Employment Needs

**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.)**

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

- 4.1 The original Allies and Morrison masterplan was endorsed by GBC and envisaged the Woodbridge Meadows and Walnut Tree Close areas being turned from employment land into housing. The council did not adopt this approach in the Local Plan as they had not identified other suitable employment land which could have been used to replace it.
- 4.2 The inspector has identified key concerns over the approach to employment land within the borough and GBC has failed to adequately alter the wording of the local plan policies in relation to these.
- 4.3 At present the plan seeks to retain large areas of employment land (Woodbridge Meadows and Walnut Tree Close) which could better serve as high density housing land as an alternative to developing land on green field sites at a comparatively low density.
- 4.4 Since January 2018, there are a number of key businesses based in Guildford who have announced that they will be relocating out of the Guildford area. These include Ericsson who have announced that they will be relocating the UK HQ to Guildford<sup>1</sup> and Colgate Palmolive who are also considering a move out of their current Guildford Office<sup>2</sup>.
- 4.5 The changing nature of employment needs in Guildford has not been adequately taken into account within the plan and provides overly-rigid protection to low-quality employment space, which may serve more effectively as housing land, whilst failing to provide for the high-quality flexible workspaces required by high-tech and high-value businesses. This should be addressed in more detail within the plan and we would welcome significant modifications to the plan policies to address these issues.

---

<sup>1</sup> <http://www.costar.co.uk/en/assets/news/2018/March/Ericsson-moves-UK-HQ-to-Readings-Thames-Tower/>

<sup>2</sup> <https://www.propertyweek.com/news/colgate-palmolive-ponders-brushing-off-guildford-hq/5096236.article>

## 5. Matter 8 - Retail and Service Centres

**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.)**

- 5.1 In the initial questions set out by the inspector there was clear concern over the redevelopment of the North Street site. The inspector asked what consideration GBC has given to *re-evaluating the balance of uses in this location having regard to the need to accommodate additional homes*.
- 5.2 GVG recognises that the amount of residential development at North Street has doubled to 400 between the 2016 and 2017 versions of the Local Plan. However GVG remain unconvinced of the high proportion of retail space allocated at North Street.
- 5.3 It is noted that the proposed 41,000 sq m of comparison retail floorspace and 6,000 sq m of food and drink is the same as the forecast for the total borough-wide floorspace capacity for comparison shopping and food and beverage uses as set out at para 4.40 in the Retail and Town Centre Topic Paper up to 2030.
- 5.4 Whilst GBC suggest that the wording to policy A6 to make the quantum of residential and retail units 'approximate' rather than 'minimum', this approach still shows that GBC is placing a much higher reliance on meeting retail demand than the overwhelming demand for housing across the borough.
- 5.5 GVG will provide further evidence at the hearing sessions to demonstrate that a more appropriate mix of uses could be delivered on the North Street site.

## 6. Spatial Strategy, Green Belt and Countryside Protection

**Having regard to the need for housing, does the plan direct it strategically to the right places?**

**Are the proposed new business land and floorspace allocations in the right strategic locations?**

**Relevant aspects are:**

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

- 6.1 GVG is clear that the plan does not make best use of brownfield land within the built-up area of Guildford. Currently the high proportion of the housing is proposed in locations outside of the built-up area boundary and this will put significant pressure on the green belt and valued landscape of the borough in addition to the infrastructure, particularly the A3 and Guildford Town Centre.
- 6.2 None of the extensions to the built-up area or stand-alone housing sites such as Wisley as currently proposed are large enough in their own right to support public transport improvements.
- 6.3 It is illogical to seek to protect employment land in areas which are far more suitable for residential development whilst at the same time building on green belt land for housing which will have a far greater impact on the relevant aspects as set out by the inspector.

**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.)**

**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?**

- 6.4 This is one of principal concerns of GVG about the current form of Local Plan. GBC has fundamentally failed to strike the right balance between green-field sites and brownfield land. The masterplan as prepared by GVG demonstrates that a significantly higher proportion of housing could be delivered in the Guildford Urban Area through proactive and positive planning. Not only could a higher proportion of housing come forward in the urban area, the reliance on greenfield and green belt sites for housing provision could be dramatically reduced. The release of large quantities of green belt has not been adequately justified by exceptional circumstances from GBC.

## 7. Matter 11 - Site Allocations

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

#### **Could the plan be more ambitious in the number of dwellings it might achieve on these sites?**

- 7.1 These sites plus A3 and A8, and sites such as those omitted by GBC at Woodbridge Meadows and Bedford Wharf, should be part of a masterplanned, holistic development plan for the town centre brownfield sites which majors on housing and its supporting infrastructure (including schools and doctors' surgeries), together generating an intelligible roofline and mix of uses that is at once sustainable and breathes new life into the town and borough – particularly in key areas that are ripe for regeneration. GVG demonstrates this in its masterplan which GBC has largely ignored in its piecemeal planning process.
- 7.2 In terms of **A5 (Jewsons Site)**, GVG supports the development of this key site and the quantity of housing allocated on the site. However GVG identifies the potential for this site to accommodate 132 dwellings in addition to an enhanced medical centre which can serve both the existing community, university campus and the predicted increase in local population
- 7.3 The comments in relation to **A6 (North Street Redevelopment)** are contained in section 5 of this hearing statement on the comments for retail centres.
- 7.4 In relation to **A7 (Guildford Station)**, the SOCG submitted with this hearing statement demonstrates that GBC is of the opinion that further changes to the Solum Application would be welcomed by the council. GVG request that the inspector asks GBC for further explanation over the suggested changes that the council feel could be accommodated on the site. GVG is still firmly of the opinion that changes could be made to accommodate the bridge link across the river and railway and through site A8 as set out below.
- 7.5 GVG submit that A3, A7 and A8 need to be considered as a whole to create a station quarter which meets transport, housing and commercial needs.
- 7.6 Regarding policy **A9 (Walnut Tree Close)**, the GVG Masterplan shows this site as open space to access the new open space adjoining the River Wey. The Allies and Morrison Plan also shows this site as open space and a key access point to the wider area of open space.
- 7.7 It is therefore unclear why it has been allocated for 3,000 sq m of office space in isolation without consideration of the site immediately to the north or the wider area.

#### **Should site A8 be residential?**

- 7.8 GVG submit the question is should be that A3, A7, A8, and the space utilised by the operational railway need to be considered as a whole. This would allow the creation of a station quarter which meets both housing, and transport, and commercial needs.
- 7.9 Site A3 is the land within the railway cutting to the south of Farnham Road Bridge. The local plan proposes it is used for housing (Flats within a cutting?) and that it may need to involve rebuilding Farnham Road bridge to make the site accessible. GVG believe this site in more suitable for a mixture of rail use, car parking etc.

- 7.10 These three sites A3, A7, A8, represent a once in a century opportunity to create a modern accessible transport hub, allowing for growth of the operational railway (new platforms), and create a mixture of housing and commercial development.
- 7.11 The GVG Masterplan shows one approach to creating a 21<sup>st</sup> century station, which allows for new platforms, safe access and interchange for all transport modes, and provides for transport links across the station area in addition to the ageing bridge currently in use. The site provides the opportunity for a mix of uses including the relocated car parking from site A11.
- 7.12 The GVG Masterplan demonstrates that there are substantial town and local planning objectives, including public realm improvements, which can be derived from a more holistic masterplan approach, including the partial pedestrianisation of Guildford Park Road and other benefits.
- 7.13 GBC has not made a calculation of the yield of residential units from the site but GVG has assessed the capacity of the site for up to 59 dwellings within the red line boundary as identified by GBC, or 121 if additional land as highlighted within the GVG Masterplan is included.
- 7.14 GVG plans don't involve building over the operational railway. However, we note that new platforms are required to the west of the operational station and we believe there may be an opportunity whilst these are constructed to build over these new platforms.
- 7.15 The Station area is a critical set of sites to solving many of central Guildford Infrastructure deficiencies as well as having immense value for housing. It needs to be planned as a whole.

### **A26, Blackwell Farm**

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

- 7.16 GVG has consistently objected to the development of Blackwell Farm on the basis of the likely traffic impacts on the A3 and particularly Guildford Town Centre. The impacts on the town centre would be particularly difficult to mitigate and it is clear that these have not been adequately considered by GBC in the allocation of A26.

### **A35, Wisley Airfield**

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

- 7.17 It is clear to GVG that the main pattern of movement from A35, Wisley Airfield, will be along the A3 in either direction with particular strain put on Guildford Town Centre. The 2,000 homes proposed on the Wisley site will not be provided with any substantial improvements in transport infrastructure and on this basis the substantial amount of units cannot be considered to represent sustainable development.

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

- 7.18 GVG share the concerns expressed at 11:37 on anticipated traffic patterns. We have yet to see any evidence that Highways Agency and Surrey County Council have a comprehensive plan for the A3 improvements and its associated feeder routes. We note that a request for a delay to a review of the Wisley Plans (A35) seems to have been prompted by access concerns raised by the Highways Agency to the A3

## 8. Conclusion

- 8.1 As set out by the inspector, the task in considering the soundness of the plan is to determine the four key matters. The opinion of GVG is set out against each aspect.

**(a) positively prepared – based on a strategy which seeks to meet objectively assessed development and infrastructure requirements;**

- 8.2 The plan is not positively prepared and the strategy has major failings on infrastructure requirements which have not been fully considered. GVG has presented a well-considered masterplan to GBC on a number of occasions and has been consistently ignored throughout the consultation process for the plan.

**(b) justified – the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence;**

- 8.3 The strategy as set out within the plan is not the most appropriate strategy due to high reliance on green field and green belt sites to deliver housing and the protection of employment land. The evidence base as relied on by GBC has been retro fitted around an inappropriate strategy which does not have the support of Guildford residents.

**(c) effective – deliverable over its period and based on effective joint working;**

- 8.4 GVG has set out the concerns over deliverability of the plan, particularly in relation to the housing trajectory. A more fundamental concern is the lack of joint working from GBC with key community groups and stakeholders particularly GVG. This has been evidenced by GVG in previous submissions and further evidence can be provided at the hearing sessions.

**(d) consistent with national policy – able to achieve sustainable development in accordance with the Framework's policies.**

- 8.5 GVG have demonstrated that in its current form the plan is not sound and is unable to achieve sustainable development due to the pressure put on infrastructure and the lack of co-ordinated approach to the masterplanning of the town centre.
- 8.6 Overall GVG has demonstrated through previous submissions that the plan has significant failings and requires significant modifications if it is to be found sound. The most significant failing is the lack of any policy commitment to a properly masterplanned Guildford Town Centre. GVG has invested significant time and money into preparing a properly considered masterplan of the town centre which has the support of a substantial amount of Guildford Residents.
- 8.7 GVG has consistently set out to work with GBC but has been rejected by them throughout the local plan process. GVG ask the inspector to properly consider the requirement for a town centre masterplan to be imbedded as a strategic priority within the local plan as a policy requirement. GVG is willing to work with GBC and other stakeholders to ensure that this vital matter in the future of Guildford is given the weight it deserves and a borough, that residents can be truly proud of, is shaped for future generations.

**4,559 words (excluding titles)**