

23rd January 2019

CAMPAIGN TO PROTECT RURAL ENGLAND (CPRE)
RESPONSE TO INSPECTOR'S MATTERS AND ISSUES
GUILDFORD LOCAL PLAN: RESUMED HEARINGS 12,13 FEBRUARY 2019

1. CPRE believes it to be totally appropriate for the most up to date 2016 household based projections to be used for the Guildford Local Plan. CPRE believes they should supersede earlier projections which overestimate Guildford's household need.
2. We do not agree that the GLHearn assessment is an appropriate basis for estimating Guildford's housing need in this context.
3. CPRE agrees with the analysis made by Neil McDonald which calls for the overall housing requirement set by the plan to be reduced in line with the revised ONS projections and NMSS analysis. The reduced need for the housing trajectory has implications throughout the plan period. To exceed housing development above need will not satisfy the test of exceptional circumstances. CPRE maintains that the 3 Green Belt strategic sites cannot be justified. CPRE notes that GBC has only recently recognised that brownfield provision can be increased in the town of Guildford with more focus on development in the North Street area and a less ambitious outlook for retail. The draft GBC Plan has underestimated the potential for housing development on brownfield sites within the town centre. Provision for extra housing supply during the first 5 years of the plan will not be required. Therefore, the sites suggested in the "Main Modifications" to which CPRE has objected will not be needed. We object in particular to main modification sites such as Aarons Hill, Hornhatch Farm, Flexford, and the 3 Green Belt strategic sites. It is necessary to take account also that the provision of a significant number of student homes have been agreed in the town and more are proposed for which permission is anticipated. These will free up other homes for occupancy within the urban area. CPRE has always maintained that the University has not supplied the student accommodation promised on its campuses.
4. CPRE agrees with NMSS that there is no unmet need from Woking to be supplied by Guildford. In any case it is incorrect to propose supplying Guildford Green Belt land to Woking in the absence of legitimate need which satisfies the test of exceptional circumstances.
5. There is no need for an extra review mechanism to be introduced into the plan as this is already provided for and there is no evidence to justify this.

CPRE welcomes the analysis made by the Guildford Residents Associations and fully supports the Neil McDonald assessment.

CPRE Guildford