

17 December 2013



Dear Councillor

Guildford Residents' Associations, representing 29 Residents Associations and 4 Parish Councils, agreed a joint response to the Local Plan Issues and Options Consultation. We hope you will find this collective voice helpful. We attach a copy.

The baton now passes to you, our Councillors, in this critical next stage, to produce a Draft Plan for us based on the evidence and consultation responses. We very much hope that you will feel able to take full account of the following, which incorporates a summary of our response.

We greatly value our close partnership with Councillors and would very much welcome an opportunity to discuss this summary and the next steps with you.

Yours sincerely  
Amanda Mullarkey

## Priorities for the Guildford Local Plan: Next Steps

### ECONOMY

- We should encourage our high tech, knowledge based and creative businesses, making good use of town centre and other existing sites. (p19)
  - The objective should be balanced and sustainable economic growth, wherever possible achieved through increasing added value rather than physical expansion. (p19,64)
- The contribution to the economy of landscape, character, and cultural and educational facilities should be better recognised. (p17)
- It is critical that we avoid over expansion of retail floor space. Storage and distribution is a low priority. A mixed use North Street development should be of enduring quality, comparable to the High Street, and not put the Upper High Street, Tunsgate or indeed the High Street at risk. (p23)
- We would welcome a new restaurant quarter around Bedford square with a marina. (p24)

### COMMUTING

- With about half of workers commuting out and half the workforce commuting in, Guildford is so interconnected that trying to house everyone locally is unrealistic. (p8)
- A high proportion of any new homes will be occupied by people who commute out and you would need to build in the order of 29,000 new homes (compared with 54,000 households in the borough) to make a significant impact on inward commuting. (p20)
- To support the economy, investing in better and more affordable sustainable transport for those who travel here is critical. This is a more realistic strategy for Guildford than suggesting everyone should live and work in the same place. (p27)

### HOMES

- Prioritise meeting the needs of Guildford and make c1 in 3 new homes affordable. (p10)
- We urgently need plans for well designed redevelopment of a range of town sites and for infrastructure to support this. Without these plans, we cannot identify our capacity to provide new homes:
  - provide housing in the town centre, along Walnut Tree Close and at Slyfield, (p36)
  - redevelop Park Barn to enhance and invest in the area, (p44)
  - free up homes in residential areas with a strategy to relocate 2,000 university students onto campus, (p15)
  - positively entice older residents out of family homes earlier into attractive, purpose built accommodation.
- Plan for just over 300 new homes per year. (p8) (The approved Woking figure is 292.) The next stage in the Plan process requires Councillors to identify an achievable figure taking account of constraints and high outward commuting, as well as "realistic" and "proportionate" need\*.

- Ensure the new Strategic Housing Market Assessment, that will inform the housing figure, is sound before publishing. Getting this evidence right really matters\*\*.
- There is growing concern that required early consultation on this evidence was not undertaken and no one wants a repeat of the problems caused by the flawed countryside evidence.

## COUNTRYSIDE

- The Area of Outstanding Natural Beauty has the highest status of landscape protection. The law requires us to conserve and enhance its natural beauty. (p46,48)
  - There are no exceptional circumstances to justify harm to this nationally important area.
  - Proposing in the evidence that damaging development is a sustainable option was unsound.
- No case has been made for development in the Green Belt and Ministers have made it clear “unmet need alone” would not justify this. (p34)
  - No strategic review of Metropolitan Green Belt has identified exceptional circumstances that would justify undermining its intended permanence in the long term.
  - “Land parcel” scores do not provide a robust basis for considering Green Belt development.
- Fundamental flaws in the Green Belt & Countryside Study have damaged the credibility of the Issues and Options consultation. (p40,60)
  - The proposals for “potential development areas” and taking villages out of the Green Belt (“insetting”) are unsound.

## CHARACTER

- We propose a Residential Density Database as part of the evidence (p59). This would inform decisions on appropriate density which is critical if the character of Guildford is to be retained.
  - We want building densities to be decided on a case by case basis guided by indicative density ranges and building heights for different areas. (p9)
- To avoid loss of character and identity, much more attention should be given to the distinctiveness of each residential community, village and open space, to the contribution of views, the river and to attractive transitions between town and country, centre and suburb.
  - To retain our historical and green character and deliver new buildings and communities with a sense of place, we need local policies that capture what makes Guildford special. The National Planning Policy Framework alone cannot achieve this. (p32,35)
- Learning from past mistakes, we need sensitively designed spaces for residents to park their cars. The priority is reduction in the need for car use not ownership. (p30)

## INFRASTRUCTURE

- Development should be conditional on investment in five year delivery phases (p28) in:
  - a new bridge across the railway/river, to unify the town,
  - a central bus interchange, with full connectivity to all sides of Guildford.
  - a transport network that makes cars unnecessary for getting into and about Guildford, including from airports and getting to work.
  - if viable in the feasibility study, an A3 tunnel through Guildford with land safeguarded, to take through traffic out of the town.
  - improved connections to the A3 to serve the town, designed with a tunnel in mind.
- All schemes to be made spade ready to bid for infrastructure, enterprise and developer funds.
- An Infrastructure Delivery Plan and rapid progress towards a Community Infrastructure Levy are urgent priorities. Meanwhile, dividing infrastructure work into packages that can be funded by individual developers will be essential. (p31)

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\* The National Planning Policy Framework Practice Guide is clear:

- 1) need assessment should be realistic and proportionate
- 2) you should not apply constraints to evidence
- 3) you should address constraints (environmental, supply of land, lack of infrastructure) when bringing evidence bases together to identify plan policies. Click hyperlink: <http://planningguidance.stationspotil.gov.uk/06guidance/basesessment-of-housing-and-economic-development-needs/what-is-the-purpose-of-the-assessment-of-housing-and-economic-development-needs-guidance>

\*\* Were the public consulted on the remit? Has the potential for other authorities to provide homes under the duty to cooperate been fully explored? Has realistic and proportionate need been assessed? Is the biggest growth area, international immigration, understood? Forecasts have proved so unreliable the water industry is basing future need on completion rates.