

GRA Response to the Draft Local Plan Consultation (July/September 2014)

The GRA and its membership

The GRA was formed in 2012 with the specific intention of assisting residents associations (RAs) and parish councils (PCs), and their residents, take part in the formulation of a new Local Plan for Guildford. Membership is open to all RAs and PCs from across the borough. Our long term vision for the borough is contained in our Aspirations for Guildford paper published in 2012 and to which our membership of over 30 RAs/PCs subscribe (attached as an appendix to this response)

The organisations forming the GRA have a membership of some 8000 thousand households (approximately 15% of the borough's households). During 2013 and 2014 we have met with the GBC Executive, our local councillors and planning officers many times. We have on numerous occasions spoken at various Council meetings, seeking at all times to work constructively and positively in developing the Plan as set out in NPPF paragraph 155. Our Aspiration for Guildford Document (Autumn 2012) sets out our contribution to the collective vision referred to in NPPF paragraph 155.

Question 1. The Evidence Base

Question: Do you agree that the evidence used for the draft Local Plan: strategy and sites is adequate, up-to-date and relevant?

Answer: No, only in parts. There are major gaps e.g. an up to date SHMA and transport studies of the proposals in the draft Local Plan, and many instances where evidence is confused with policy i.e. the evidence is not presented simply as facts but manipulated to support a desired outcome. Brief specific comments are included below. More detailed comments were included in our response to the Issues & Options (I&O) consultation.

Specific comments

1. The SHLAA

- a. There is no allowance for windfall development in the SHLAA. A reasonable allowance of about 50 units per annum should be included in the SHLAA, particularly in view of the recent relaxation in converting commercial accommodation into housing units.
- b. All un-built student and staff accommodation for which the University of Surrey has full planning permission, should be included, and fully accounted for, in the SHLAA.
- c. All undeveloped land at Manor Park, or any other land owned by the University, should be included, and fully accounted for, in the SHLAA.
- d. Green Belt land should only become available for development after all brownfield and urban sites have been fully exhausted.

2. The SHMA

- a. Only the 2009 SHMA has been approved by the Council and it is out of date, and was approved under different rules before the NPPF came into force. At that time, the housing target was not driven directly by this assessment and its methodology did not receive close scrutiny from residents. We therefore suggest that little reliance should be placed on its conclusions

- b. The 2014 Draft Guildford SHMA:
 - i.* Is already outdated by the release of the ONS 2012 SNPP projections.
 - ii.* Is not transparent as to how its proposed target is based on the 2011 SNPP projection and does not adequately justify its assumptions.
 - iii.* Does not take into account external and local developments (e.g. changes in government policy) to turn the ONS projections into an objective forecast of local housing need.

3. Settlement Hierarchy and Profiles:

- a. Characterising settlements and their access to services and transport is useful but ranking villages according to misnamed “sustainability” and functional scores with weightings does not provide a basis for directing growth. The objective is identifying future capacity for sustainable growth, while respecting limits, not turning larger villages into small towns.

4. Infrastructure Baseline:

- a. Infrastructure investment has failed to keep up with current levels of development. In these circumstances, the Infrastructure Baseline should include more detail on deficiencies in existing provision and, as the Draft Local Plan does not include measures to address existing infrastructure deficits, GBC should set out in the Evidence Base the measures it intends to take to identify and promote schemes that address deficiencies, particularly in transport infrastructure.

This study needs to rectify the omissions pointed out in our response to the I&O consultation and be more transparent where changes to infrastructure proposed are driven by the aspiration to redevelop sites. Library relocation, bus station relocation and use of car park sites for development are examples. Guildford already has a convenient, centrally located library with potential to act as a community hub that, along with the Post Office, promotes footfall in the upper High Street and North Street.

5. Green Belt & Countryside Study:

- a. The brief was to identify “realistic sustainable location(s) for green field release.” The criteria and assessment are so flawed that Volumes 1, 2 and 3 are unsound and cannot be relied upon as a basis for decisions.
 - i.* **Scoring system** - This loses any meaningful link with the overall purpose of Green Belt or the value of specific sites.
 - ii.* **Sustainability** - The study puts Green Belt close to settlements at risk by misrepresenting sustainability as “distance from facilities”.
 - iii.* **Village insetting assessment** – This does not comply with NPPF because the scoring system confuses grounds for insetting and boundary advice
 - iv.* **Areas of Outstanding Natural Beauty** - The study fails to apply policies designed to protect the Surrey Hills AONB which has the highest status of landscape protection, equivalent to a National Park.
 - v.* **Inconsistent approach** - The report adopts an inconsistent approach to assessing land parcels.
- b. A more strategic review of fulfilment of Metropolitan Green Belt purposes, informed by description of land parcels, is essential. We propose GBC:
 - i.* adds a strategic element to the Green Belt assessment
 - ii.* disregards the scoring against four criteria as a basis for identifying potential development areas
 - iii.* drops the problematic village insetting scoring system and clarifies that the so called sustainability assessment is a measure of “proximity to facilities”

6. Infrastructure, Access & Transport

- a. The ‘Planning for Sites’ section of the draft Local Plan contains a paragraph on the Evidence Base. The list of ‘key studies’ includes the Infrastructure Delivery Plan. In

fact the IDP does not yet exist and has not been published, so the evidence base is incomplete.

- b. Surrey County Council is preparing a new Local Transport Strategy for Guildford, but it is not available at the time of this consultation. As the Highway Authority, the SCC plans are important for the borough.
- c. The A3 strategic route through the borough is the responsibility of the Highways Agency. The Topic Paper on Infrastructure and Delivery published by GBC sets out the NPPF requirement to take account of the need for strategic infrastructure, and the NPPG advises that Local Plans should set out what infrastructure is needed and who should deliver it. The traffic problems on the A3 through the borough are widely acknowledged, not least by GBC. However, the report for the HA 'M25 to Solent route-based strategy evidence report' (April 2014) has not been included in the evidence base, and is surely relevant. It identifies 'capacity on the A3 around Guildford' as a key challenge (para 4.7.13), but makes it clear that the HA's current programme of works does not address the issue.
- d. The Enterprise M3 Strategic Economic Plan 2014-2020 (March 2014) includes a Growth Package for Guildford. This is also evidence that logically should be in the evidence base. It lists three strategic schemes 'which will not be funded through the Local Growth Fund, but are vital to the overall success of the package'. These are A3/M25 Wisley Interchange, Guildford A3 Strategic Improvements, and a North Downs Line major improvement programme. It also lists an A3 Strategic Package-NE Guildford and new railway halts at Merrow and Park Barn. (See pages 75-76). The absence of any indication of funding or timing of any A3 schemes is a major shortcoming in assessing the proposed major housing developments in A3 corridor in the draft Local Plan.
- e. The Infrastructure Baseline gives a good summary of the position regarding transport in the borough. Since its publication in 2013, further work has been carried out and added to the evidence base, notably the Options Growth Scenarios Traffic Assessment Report (OGSTAR) produced by SCC for GBC, and the Guildford Town and Approaches Movement Study carried out by Arup for GBC, the results of which are contained in three reports.
- f. OGSTAR is useful in identifying the growth in traffic by 2031 due to planned growth in the borough and the surrounding region. The pressure points in the network have been identified using a strategic traffic model, and inform the proposals in Appendix B Infrastructure Schedule of the draft Local Plan, such as in the Ash/Tongham area. However, the major routes are not addressed and so the context for the local proposals is missing. For example, item 5.1.2 describes a new junction on the A31 or A3, but knowledge of the conditions on those routes and the practicality of such a connection is missing. OGSTAR was completed before the draft Local Plan was finalised, and so the scenarios tested do not correspond to the scenario formed by the current development proposals. The evidence base would be enhanced by a new test using the draft Local Plan scenario to forecast 2031 traffic.
- g. GTAMS was set an ambitious brief to look at long term proposals for the town centre and its approaches. The outcome is a recommended strategy based on delivery of a major reduction in the use of cars for journeys to work, but the means of achieving this shift in behaviour are described only in very general terms. There is a marked absence

of any highway proposals. The study is flawed in that it used a 2031 traffic forecast that only included current land use and approved planned developments within the borough. This bears no relation to the draft Local Plan growth plans. The major scheme that is proposed in the strategy is a ‘Sustainable Movement Corridor’, at an estimated cost of £75-100m, but there is no analysis of this scheme at all. *The GBC Topic Paper on Infrastructure says in para 5.12 that the route has been safeguarded from the town centre to the university.....* Schemes to improve the operation of the A3 were treated as undeliverable in the Appraisal Report, a position which is inconsistent with the EM3 and HA strategy outlined above.

- h. The Town Centre Vision report produced by Allies and Morrison for GBC, and which is included in this consultation, includes radical proposals for the town centre road network. No traffic analysis has been carried out to investigate the implications of the proposal at this point, so additional work needs to be added to the evidence base. The one scheme in Guildford that will receive a funding contribution from the Local Growth Deal is improvement of the town centre gyratory in 2016/17, and the preparation of the scheme details will be informed by the origin-destination survey carried out in May 2014. The incorporation of the results of this survey into a detailed traffic model will aid the assessment of the A&M proposal and any other town centre schemes.
- i. The two new railway stations (or halts), one at Merrow and one at park Barn are included in the Appendix B - Infrastructure Schedule. *There is a lack of analytical evidence in support of these proposals, and it is not clear whether there has been any engagement with Network Rail or train operators about the practicality of the schemes*
- j. The evidence is not available to consider the consequences of proceeding with or delaying sustainable airport links including a Heathrow rail link.

Question 2. National Policy and guidance

Question: To the best of your knowledge, do you consider that the draft Local Plan: strategy and sites is consistent with national policy and guidance.

Answer: No, it fails in various respects including:

- a) The housing assessment does not take account of local factors, the current government policies and local constraints.
- b) Current infrastructure deficits, the solutions to which are not covered in this draft Local Plan or elsewhere, are not considered as constraints.
- c) The infrastructure needs arising from the developments proposed in the draft Local Plan have not been adequately evaluated.

Question 3. Sustainability Appraisal and Habitats Regulation Assessment

Question: Having looked at the Sustainability Appraisal and Habitats Regulation Assessment do you agree with:

1. The Sustainability Appraisal of the draft Local Plan: strategy and sites?

Answer: No. The appraisal rests on the assumption of a housing target of 652 dwellings pa and there is no logical support for this figure in the public domain. Also it does not take full account of the current infrastructure deficit and the inadequately developed infrastructure plans to support the growth incorporated in the draft Local Plan. The basis for concluding that policies would not have a negative effect on various sustainability objectives is weak and not based on convincing evidence and assessment.

2. The Habitats Regulations Appraisal of the draft Local Plan: strategy and sites:

Answer: It is not possible to conclude from this assessment that harm to the Special Protection Area will be avoided and that the Plan is compliant with the Directive. Unfortunately the appraisal is based on a housing target of 652 which is not an agreed or supported figure. The analysis of air quality problems is based on an assumption that background levels of nitrous oxide will fall very significantly by 2030, in part due to reduced congestion, whereas this is not borne out by the evidence. Measures to address the air quality concerns identified are not adequately developed for this stage in the process. Very importantly, the assumption that the development of further SANGS will provide adequate protection for the Thames Basin Heaths is unproven. Residents are not convinced that this will offset the impact of the proposed development close to these very sensitive areas.

Question 4. The Vision

- a) **Question:** Do you think the vision of the draft Local Plan: strategy and sites depicts the borough that communities would want to be living and working in by 2031?

Answer: No. It is too vague to form a judgement and creates aspirations that can never be met e.g.

1. The vision should spell out the sort of world class business we wish to attract – some world class business would be inappropriate to Guildford.
2. The expression “strong infrastructure” is insufficiently clear. The Foreword states that infrastructure investment has been neglected over many years. Is it the intention of the vision that this neglect will be addressed in the period of the Plan? If so it would be better to say this.
3. “new homes will meet the needs of all members of all communities”. This statement is utopian, unrealistic and is out of line with the Sustainability Appraisal Scoping Report. Which communities does the statement have in mind – all current communities or all who wish to come here irrespective of their financial means and nationality?

- b) **Question:** Do you think the ambitions, issues and strategic objectives of the draft Local Plan: strategy and sites are representative of the issues the borough faces and the things that we will need to achieve to meet our vision for 2031?

Answer: No. This table should link more tightly to the statement in the Vision and Ambition section. Surely the wording under “Ambition” should be taken from the Vision and Ambition? Currently it is not and is too vague. For example under the Theme sustainability, the column merely repeats the theme. Secondly the objectives are imprecise, not measurable and have no dates as to when they will be achieved. They should conform to the S.M.A.R.T. model to better enable progress tracking.

Question 5. The Key Diagram

- A) Do you think that the Key Diagram is representative of the key aspects of the draft Local Plan: strategy and sites?

Answer: Although complex and unlikely to be understood by the lay person, it indicates the area designations and sites of proposed change. It though gives no representation of the scale of the proposed change e.g. on the basis of 652 dwelling per annum, accommodation in the borough will increase by a quarter

- B) Is there anything missing or is there a way to make the Key Diagram clearer?

Answer: Yes. The chart should include key features e.g. housing numbers, of the planned developments in areas surrounding Guildford, as these will also impact the borough. There is no bus interchange, a critical facility given the modal shift desired.

Question 6. The content – paragraphs, policies and site allocations

Main Conclusions

The Guildford Local Development Framework 2014 states:

“Whilst there will be opportunities for the community to engage throughout the content of the Local Plan, a number of key phases of engagement are highlighted when you can get involved:

- (a) draft plan consultation
- (b) pre-submission consultation (a more focused consultation seeking representations in relation to the soundness of the plan).”

This then is the last consultation when residents’ comments can truly influence the plan; this is unacceptable since the plan has not been sufficiently developed since the Issues & Options consultation to allow them to do so in a meaningful way and nor is the evidence base complete.

- **The Vision is far too imprecise and insufficiently ambitious:**
 - It gives insufficient direction as to the sort of “world class business” we wish to attract and this influences the land to be set aside for business development and the infrastructure required.
 - The ambition for homes set out in the Vision is out of line with GBC Sustainability Appraisal (July 2013)
 - The plan does not say how “excellent design” will be defined
- **We do not have an agreed SHMA and the assessment of housing need in the current draft SHMA is not justified by an analysis of the data.** The current SHMA (the Guildford SHMA) remains in Draft. A new joint local authority SHMA is being prepared but will only be seen by the public after this consultation has been concluded. Meanwhile new ONS statistics predict the population of Guildford will be just under 5000 people fewer than assumed in the draft Guildford SHMA, greatly reducing the need for additional housing. The GRA believes that even these new ONS figures overstate the likely population growth as virtually all the growth to 2021 is predicted to come from net international migration. This prediction is based upon the net international migration over the past 5 years which is highly unlikely to be repeated.
- The NPPF states (para 182) that the plan should seek to meet ... objectively assessed development and infrastructure requirements..” **Yet the infrastructure proposals in the Draft Plan have not yet been objectively assessed and are, at best, at an early stage of development.**
 - Traffic studies are only now being carried out and the desk top models have tested scenarios which are different to the development scenarios in the Draft Plan.
 - The infrastructure proposals included in the Draft Plan are insufficiently developed to judge if they will meet strategic objectives and, as their funding is uncertain, there is a significant risk that they will not be delivered.
 - The Draft Plan takes no account of the current problems with infrastructure that are to some part set out in the Evidence Base. (see the Foreword to the Draft Plan which says “over many years the town’s infrastructure has been neglected.”) This is a significant deficiency in the draft Local Plan.

Our conclusion, that the plan is insufficiently developed for this stage in the process, was supported by many councillors at the Council Meeting in June 2014. We reserve the right to

make further comment and possibly change our position when the documents currently missing from the evidence base are completed.

Lastly we believe that the reporting of residents' comments in the Issues and Options consultation was not in line with NPPF paragraph 155 in that it did not bring out the collective vision of residents. It is surely not adequate merely to dismiss residents' views on the grounds that they are out of line with the Council's interpretation of current planning law. The NPPF paragraph 1 states that the Plan should "*provide(s) a framework **within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans which reflect the needs and priorities of their communities.***" (NPPF 1). How can this be done unless the views of the local population are gathered and summarised during the consultation process?

Comments by Policy

POLICY 1: Presumption in favour of sustainable development

GRA Response

We object to this policy as drafted.

The draft policy misrepresents Sustainable Development and confuses it with the policy of planning positively. The NPPF uses the IUCN definition of sustainable development and says that to achieve Sustainable Development, the policies in the NPPF should be pursued **as a whole**. The selective use of the NPPF distorts sustainable development.

For the avoidance of confusion, Paragraph 4 of this policy should set out the specific policies that restrict development as set out in the NPPF e.g. the Birds and Habitats Directive, SSI, Green Belt and AONB.

Reasoning:

The section on "Monitoring Indicators" should state that the Monitoring Report will cover all three aspects of sustainable development as set out in the NPPF i.e. economic, social and environmental. Currently it focusses on the provision of additional housing and employment land. It should also cover:

- A regular assessment of the ability of the local infrastructure to cope with the increased development (housing and commercial development).
- An environmental impact assessment of new development to check that this was as planned
- Reductions in targeted housing and employment land if new demographic and other studies indicate lower growth than forecast.

POLICY 2: Borough Wide Strategy

GRA Response

We **object** to this policy.

The proposed housing target is a more than doubling of the target since the year 2000 and is not supported by the evidence; the SHMA remains a Draft and is to be followed by a joint SHMA, it is based on inaccurate and out of date data, its forecasting logic is not supported by Edge Analytics, it

takes a totally illogical and unsubstantiated view on international migration, it has not been approved by the Council and is not in line with the NPPF and NPPG.

Reasoning:

- The SHMA remains as a draft; it is based on data which is acknowledged to be inaccurate and has not been updated for revisions to ONS data which reduce the forecasted population of the borough by 4000 by 2021.
- A review of the ONS projections and the CLG data indicates that a housing target (before constraints) in the 600 – 700 dpa range as forecasted by GL Hearn is unsound:
 - Household formation 2001/2011 was 160 pa and until 2008 was a fairly benign period in many ways. Why should the future, which is likely to show lower economic growth than the past due to sovereign debt levels, be so different to the past?
 - Over-occupancy levels of some 6% in Guildford barely changed between 2001 and 2011 refuting the proposal that there was suppressed demand during this period. As at 2011 the level of over-occupancy in Guildford was lower than in the South East or England as a whole.
 - The 2012 projection shows total population increasing from 137,600 (2011) to 161,300 (2031) as shown in Table 2 below, an increase of 17%. This would (assuming no material change to the housing formation ratio) indicate a need to increase the number of dwelling from 54,183 in 2011 by some 9200 dwelling over 20 years, or 460pa.
 - The latest ONS population projection (the 2012 projection) differs from their 2011 projection, on which the draft Guildford SHMA is based. It requires thorough analysis and the application of experienced mature judgement in order to develop a sound forecast on which to base an assessment of housing need.

For example, net international migration has been the main cause of growth in Guildford's population in the second half of the 2001/11 decade (see below)

TABLE 1

Source Guildford SHMA Appendices (page 21) including adjustment to international migration as set out in para 1.6

Category	2001/2005 Total change	2006/2010 Total change
Natural change	2103	3116
Net Internal Migration	-55	43
Net International Migration	-1410	3538
Other Changes	52	42
Total Change	899	6907

However, analysis puts doubt of the local validity of the prediction in both the 2011 and 2012 ONS projections which are based on events in the past 5 years.

<i>TABLE 2</i>	ONS 2011 SNPP 2011	ONS 2011 SNPP Period 2012 - 2021	ONS 2012 SNPP Period 2012 - 2021	ONS 2012 SNPP Period 2012 - 2031
Population	137,600	156,300	151,400	161,300
Natural Change		7,100	6,200	13,000
All Migration Net		9,200	5,600	8,900
Population Increase		16,300	11,800	21,900
of which				
Net Internal Migration		-1,500	-5,700	-14,800
Net International Migration		10,500	11,100	23,100

The Guildford SHMA states (Appendices page 20) that it is “quite probable” that the growth in international migrations after 2005/6 is driven by the growth in student numbers and that “in the period 2005/10 ONS data states that 57% of international migrants were students”.

In the future, UNIS, which is the largest student body and which grew full-time students by 5850 in the period 2001/11 (source SHMA Appendices page 35, para 1.8) of which just over 2000 came from overseas (page 37), only plans further growth of 2800 in full time students in the next 10 years. This decrease in planned expansion by UNIS implies that it is incorrect of the SHMA to assert that, as regards student numbers, future international migration should be based on what occurred in the past 5 years. The GRA argues that international migrants are much more likely to be full time rather than part time students and so the assertion in our paragraph above is much more likely to represent the true situation than that in the SHMA (Appendices page 44, paras 134 and 135) which compares total student growth in the past and future (part time and full time). It is a fact that the growth in overseas students better correlates with the growth in full time rather than part-time students.

According to the Guildford SHMA (page 20) some 43% of international migration in 2005/10 was due to migrants other than students. The drivers for this migration are unknown but are likely to include workers coming to the UK. This rate of migration is unlikely to continue since:

- i. The same rate of expansion of the EU is unlikely to be repeated.
- ii. The result of the recent European elections is likely to result in steps to reduce migration from the EU and government is committed to reduce migration from the rest of the world.

Edge Analytics similarly do not support the approach of GL Hearn of basing future housing need on developments in the past five years of history, because of the distortion caused by the sharp increase in international migration in the second half of that decade.

On the basis of our assertions above, the 10,000 to 11,000 figure for international migration in the 2011 and 2012 ONS figures (Table 1 and used without adjustments in the draft Guildford SHMA) is likely to substantially overstate likely future international migration by over 1000 persons over the next 10 years, again reducing the need for additional housing, and indicating that need is likely to be in the 300 to 400 dpa range.

To achieve greater confidence by residents in likely net international migration figures, it is essential that GBC contact the major learning institutes in the borough and build a

bottom up picture of likely need rather than utilising ONS projections which are less reliable at a local level. The University Vice-Chancellor informs us that the student population of the University will only show a small increase over the next 15 years

- The invitation to tender by which GL Hearn was appointed to prepare the Draft SHMA asked for need to be separated from demand. It is not clear that this was done. It did not point out any specific characteristics of Guildford to be taken into account and contains the following phrase “involve all key stakeholders, including house builders, registered social and local councils ...” This seems to indicate a bias towards development rather than an objectively assessed need.
- The Foreword to the Draft Plan refers to “persistent under delivery of housing in past years” This statement is not supported by the NPPG and GL Hearn note in the Draft SHMA that we met our housing target over the 10 year period (2001/11) covered by the last Local Plan”. It is only true of the period since the onset of the recent economic downturn and this is too short a basis on which to judge delivery performance (NPPG Paragraph: 035 Reference ID: 3-035-20140306)
- The Draft Plan does not set out its approach to constraints to development which under the NPPF can lead to the housing target being reduced from the objectively need. For example the Foreword to the Plan and the Infrastructure Baseline document indicate that inadequate investment in infrastructure has been made in the borough for some time. The NPPG (paragraphs 30 and 31) indicates that inadequate infrastructure is a valid constraint. Other constraints include the Green Belt, AONB, SSSIs, SANGS addressed later in this response.
- The economic analysis supporting the Draft SHMA proposed housing target does not take adequate account of commuting in meeting the needs of the growing local economy. With currently nearly 50% of the workforce travelling into the borough to work, and a similar percentage travelling out, sustainable transport is always going to be a critical part of the approach to sustainable planning for Guildford. Whatever the number of new homes that are built, travel in and out of Guildford will continue to be a notable feature of economic activity in the borough.

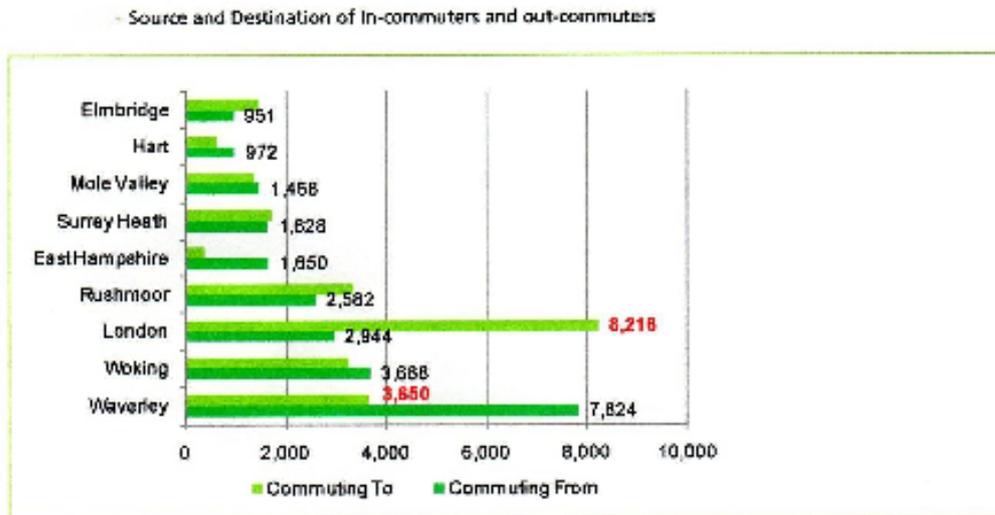
It therefore cannot be assumed that there is a direct link between growth in the local economy and the provision of local homes, apart from in the affordable housing sector where the provision of affordable housing can be targeted at meeting local need. We consider there is a very strong evidence based case for saying that meeting such local need for should be given priority over providing dormitory housing for those who commute to work outside the borough.

In other sectors:

- Significant numbers will continue to move to Guildford with a view to commuting out to workplaces outside the borough.
- Many who move to Guildford to work in the borough will remain when their place of work changes from Guildford to elsewhere.
- Many gaining work in the borough will choose to commute from outside the borough due to family reasons (dual jobs, children’s education) and the transient nature of current jobs.

Hence, we suggest an appropriate housing figure should allow for travel to work patterns, and consider opportunities to improve the sustainability of inward commuting and availability of appropriate housing land. The constraints on capacity in a gap town and the phenomenal level of commuting, means we need to “decouple” economic growth and housing.

- We disagree that the affordability of houses in the borough is responsible for the scale of current commuting::
 - By far the biggest category of inward commuters to the borough is people from Waverley (7824). Given the price of homes in Waverly, a significant part of this group is likely to be people choosing a more rural lifestyle rather than people who are priced out of Guildford. Also more commute to than from Rushmoor.
 - London is the destination of the largest numbers commuting from the borough. Guildford property prices are lower than London.



Source: Census of Population 2001

It is not commuting but congestion and the lack of appropriate public transport options that are the main problems for local employers. Commuting could and should be turned into a critical part of the solution in a constrained gap town. The priority for sustainable development should be to invest in infrastructure to provide environmentally acceptable and affordable ways for people to travel in and out of Guildford to work and for other reasons. This should be funded through the value added to the economy, including contributions to business rates.

- Because the Vision statement is so imprecise, it is not clear that the proposed provision of industrial land fits with the sort of World Class businesses it is intended to attract.
- As the housing target has not yet been decided, the need for safeguarding 99ha of land cannot be judged.

POLICY 3: Homes for all

GRA Response

We **object** to this policy.

Reasoning:

“Homes for all”

The title is misleading. The GBC Sustainability Appraisal (July 2013) defined the objective as “SA Objective 1 – To provide sufficient housing of a suitable mix taking into account local housing need, affordability, deliverability, the needs of the economy, and travel patterns.” This objective reflects the constraints to housing delivery in Guildford and the role that commuting plays in modern life. The objective is not to provide “homes for all”.

It is not clear if mixing traveller accommodation with market housing development on strategic sites is practical.

Proposed changes to the Policy wording

- In the paragraph on “Housing Mix”, the word “expect” is too weak.
- In the paragraph on “Students”, the phrase “or on university owned land” should be deleted.

Density:

The policy is insufficiently precise.

The Plan should set out a framework of indicative housing density ranges for different areas coupled with a very clear policy that appropriate density, building height, spaces between buildings and the ratio of hard to soft surfaces should be decided on a case by case basis according to the character of the surrounding area. To support this framework, the Evidence Base should include a data base of the current density of development in different communities across Guildford, including recent developments. Where it is not out of character, the framework should allow reasonable increases in density in urban areas where appropriate to allow for blocks of flats and to allow for increases in the density of affordable housing.

Access to public transport should be taken into account, as one factor among several, when considering appropriate density and parking requirements. However, inappropriately high density that harms character would be unacceptable and unsustainable regardless of whether a location is close to a bus stop or railway station.

It is very unlikely that any development above 4 or 5 storeys would be acceptable in any location in Guildford given the importance of the topography and of views into and from the town. Lower densities of 20-30 dwellings per hectare may be appropriate to retain character in some parts of garden suburbs and villages. 30-40 dwellings per hectare will often be an appropriate range, with building height confined to 2 -3 storeys.

High density and taller buildings should be avoided around the edge of built areas to continue the approach of soft green edges that are a valued feature of Guildford. Attractive higher density redevelopment to enhance Park Barn and support the needs of the Hospital and Research Park is preferable to nearby green field development below the Hog’s Back.

Students:

The setting of a target for University student accommodation on campus is welcome. However, the University first proposed a 60% target in 2003 (Manor Farm Master Plan (2003), Section 5.2) and has so far failed to achieve it. We propose that a higher target is required, in line with the approach taken in Oxford and that monitoring of the performance of the University in achieving it is crucial. For such an important indicator, the plan should state what the actual ratio is now and how it has developed over the past decade. Further it should be made clear that the indicator refers to the Surrey campus and does not include data referring to other sites at which the university operates. UNIS states that currently 54% of students live on campus but this is not verifiable and may not include all students.

The draft Guildford SHMA suggests that the University’s expansion plans will attract further overseas students. The University will benefit financially from this and we therefore question why accommodation for them all is not provided on campus and the 60% target increased

It is particularly of concern that the University has consent for campus accommodation that has not been built and that it is developing the veterinary school on the site of a proposed accommodation block which could have been sited elsewhere. Over 2,000 university students are estimated to live in private rented homes within the town and this is likely to increase with the opening of a medical, veterinary and business school. This represents a large number of more affordable homes that could potentially be made available to the wider community if the university had more accommodation on their own campus.

If the university is to buy land in the town for student accommodation that could otherwise be used to provide housing for the general population then the situation is not improved, so the phrase “or on university owned land” should be deleted.

Travellers

It is recognised that the borough is required to provide sites through the plan-making process. However, Government policy is very clear that “Inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances”. Traveller sites (temporary or permanent) in the Green Belt are inappropriate development. This has recently been reinforced by the Planning Minister in a letter to Guildford’s MP in which he expresses concern that Inspectors have not always given the Green Belt “sufficient protection that was the policy intent of Ministers”. Guidance is also clear that any boundary review to meet an identified need for a traveller site should be “an exceptional limited alteration” in “exceptional circumstances”, “to meet a specific identified need” and “specifically allocated in the development plan as a traveller site only”.

The Plan should include policies that prevent hard standing created for traveller sites becoming a justification for future permanent housing development.

Viability

This is too vague and is open to abuse by developers who should not be protected by GBC if they overpaid for the land making the development uneconomic.

POLICY 4: Affordable homes

GRA Response

We support the intention of this policy but **object** to the quantum of affordable housing that the policy indicates need to be built.

We suggest that the quantum of affordable houses quoted in the policy be reviewed, and the “subject to viability” wording in the policy and the Viability paragraph (p. 34) be toughened or dropped.

Reasoning:

P32 states “Sufficient housing to meet the needs of the borough’s population will ensure that the borough thrives as a balanced and sustainable community. As well as the benefits to people’s lives that having suitable housing can bring, this will also help to support the economy and potentially reduce travel to work journeys.”

This statement ignores the following realities:

- Some 50% of homes in the borough are occupied by people who work outside the borough. Housing built in the borough is likely to be bought by commuters and will not be available to meet the needs of the borough’s current population.

- Commuting to work is a lifestyle choice for many people due to dual jobs, the temporary nature of jobs and the need to give stability to children's education.

We support the intention to provide more affordable homes although question the quantum for the reasons given in response to Policy No. 2. We are concerned that the 40% affordability target may be too high and recommend that GBC explore ways to build required number of affordable houses within a lower and more acceptable overall housing target. For example, in villages with fewer than 3,000 inhabitants, the threshold should be reduced to three dwellings.

The section "Off-site provision and payments in lieu of on-site provision" raises the following concerns:

- It would require pooled contributions that would not be possible between April 2015 and approval of a Community Infrastructure Levy charging schedule.
- Guildford would need to be confident it could provide appropriate sites and deliver. Experience with collecting funds for Suitable Alternative Natural Greenspace, public open space and play areas, and other Section 106 provision has not been good. The Council opted for other forms of development on land it had earmarked for significant affordable housing provision. E.g. Civic and Bellerby Theatre sites.
- There needs to be realism as to how many contributions are feasible. We will expect developers to contribute to infrastructure, including significant transport investment.

In the section "Affordability and Need":

- The first sentence in the section (...50% can't buy or rent a home suitable to their needs on the open market) is misleading in that it omits the fact that most people have equity in their homes.
- We challenge the implied conclusion that building more houses will bring down house prices, thereby making them more affordable. The analysis excludes the impact of being within commuting distance of London, which pushes house prices to undesirably high levels. Edge Analytics in para 3.6 of their review of the Draft SHMA (May 2014) state "Whilst it is evident that Guildford Borough has a particularly acute affordability issue, it is less clear how an upwards adjustment to housing provision would manifest itself as an improvement to the affordability position".

POLICY 5: Rural exception homes

GRA Response

We **support** the intention of this policy but are concerned about its soundness e.g. the wording in:

- The first bullet point in the policy is too vague to offer clear guidance.
- Paragraph 4.66 gives developers too much opportunity to avoid the policy. Rural exception sites should be limited to the development of affordable dwellings only.
- Paragraph 4.68 may not be enforceable

Reasoning:

Rural exception schemes can play a role in meeting local housing needs providing they relate well not only in terms of their size but also their impact on the landscape, wildlife and the distinctive local character of a village. However there is a conflict between this policy and the flawed "Green Belt and Countryside Study in the Evidence Base. The volume of "potential development areas" identified by that study means:

- There is a risk that rural exception housing will be forced onto much less acceptable sites. The consultant's brief was to identify all sites that could be developed without landscape impact or sustainability issues.
- The likelihood of purchasing "potential development areas" cheaply for rural exceptional housing is diminished as owners will assume the land will be developed in due course.

In practice, if Guildford maintains an up to date Local Plan with appropriate allocated sites and affordable housing policies, there should be little need for an exception policy. It should instead be possible to meet local, village-based need for affordable housing as part of an integrated approach on small sensitively located, allocated sites. Setting a lower threshold for affordable housing provision in small villages as proposed in answer to Policy 4 should assist in meeting local needs and make the provision of market housing on exception sites unnecessary.

POLICY 6: Making better places

GRA Response

We **object** to this policy

Reasoning:

We warmly welcome inclusion of a strategic policy to promote high quality, distinctive and inclusive design. We appreciate that more detailed policies will follow in the form of development control policies. In the absence of those draft policies, it is not possible to assess whether the strategic policy is appropriate or adequate. We strongly support elements of this strategic policy but raise two major concerns at this stage and reserve our right to make other comments, subsequently, as further detail emerges. Firstly, critical features of Guildford that give the borough its distinctiveness are not captured, in particular the green approach routes and settlement edges. Secondly, the policy does not ensure we design space for vehicles as well as discouraging their use. It is important we learn from past mistakes and avoid the street scene continuing to be dominated by parked cars. These issues are reflected in our Aspirations document and our response to the Issues & Options and other consultations.

Section 7, paragraph 62 of the NPPF states "Local planning authorities should have local design review arrangements in place to provide assessment and support to ensure high standards of design". They should also, when appropriate, refer major projects for a national design review. In general, early engagement on design produces the greatest benefits. In assessing applications, local planning authorities should have regard to the recommendations from the design review panel."

We wish to support the Guildford Society proposal for a Design Review Panel to be established in the borough. We believe that its conclusions should take into account the GBC Residential Design Guide and GBC Landscape Character Assessment. As with our proposal for setting our indicative densities, RAs and PCs want the conclusions of the Panel to be specific to the different areas within the town and the villages and in line with the Character Assessments of the conservation areas.

POLICY 7: Sustainable design, construction and energy.

GRA Response

We **object** to this policy as written. It must be more precise in its goals, emphatic in its approach and state how conflicting priorities will be dealt with.

- Paragraph 4.77 should state “Our Corporate Plan sets out ~~our ambition to see~~ **how we will ensure** good practice in sustainable development across the borough.”
- The first paragraph in the Policy should include an aim to harness rain water.

Reasoning:

The Policy should set clear targets and the infrastructure investment it requires to achieve these. It needs to spell out how it will keep pace with changes in technology and the opportunities these bring. It should state how it will achieve these goals e.g. through redrafting building regulations. For example, it should distinguish between:

- Measures needed to make us more **resilient** to the extremes of water shortage and extreme rainfall and
- Steps we need to take to reduce our harmful impact on the environment (**sustainability**).

Resilience: We should treat the Wey floodplain as an asset that reduces flood risk to property and also encourage more flood resilient design and layout of homes and public space. Sustainable drainage systems, including permeable paving, should be encouraged given the rapid runoff that can flow down streets from the downs and overwhelm lower lying areas.

Redevelopment presents important opportunities for improved layout and the policies in the National Planning Policy Framework, including the sequential test, should be rigorously applied. We should be mindful of why certain spaces have been left undeveloped over the years; we could pay a high price for inappropriate development.

Sustainability: The policy needs to be more open about how conflicts between different sustainable development objectives will be addressed. For example:

- A fine building or green area may be considered an “irreplaceable asset” and, where that is the case, it would be unsustainable to harm it.
- A solar or wind power measure might destroy the character of a valued distinctive building or an area of great natural beauty and would not always be the most sustainable option.
- A corkscrew water power facility may cause disproportionate harm to wildlife.
- Combined heat and power requires a joined up approach to all environmental impacts, including emissions. It is not sustainable if it involves incinerating materials that should be reused.

The text should not inadvertently endorse incineration.

POLICY 8: Surrey Hills Area of Outstanding Natural Beauty (AONB)

GRA Response

We support the intention of this policy but **object** to the execution.

It misrepresents the test for assessing exceptional major development.

To avoid confusion, the types of developments referred to by the phrase ““the AONB does not preclude specific types of development”” should be specified as is done in Policy 10.

Reasoning:

Countryside and villages in the Area of Outstanding Natural Beauty should be given the highest status of landscape protection in line with legislation. There should be no major development whatsoever in the AONB. (There is no exceptional public interest that would justify overriding this.) Indeed, there

should be no development in the AONB unless this serves the purpose of designation, associated statutory duties and is consistent with conserving and enhancing natural beauty.

The importance of protecting views into and out of the AONB should be included in the policy wording, a principle dating back to the 1947 Hobhouse Report.

We look to plans to redevelop the Mt Brown site to respect the character of the AONB, to limit the footprint and height of buildings so that a “village” feel is attained.

We take the view that it is logical for AONB candidate areas, identified in the 2007 Review of the Area of Great Landscape Value and more recent Landscape Character Assessment, to be given a high level of protection from development.

POLICY 9: Villages and major previously developed sites

GRA Response

We **object** to this policy as currently written.

Reasoning:

Overall the Green Belt and Countryside Study is so flawed that it cannot be relied upon as sound evidence. It is noted that Volume IV was commissioned, and the number of villages studied expanded, due to the introduction of the National Planning Policy Framework. This changed the criteria for determining whether a village should be taken out of the Green Belt (inset). Both Volumes III and IV of the Green Belt and Countryside Study provide some useful data on each of the villages studied. However, the analysis undertaken to consider whether villages should be inset is unsound and draws conclusions that need testing:

- There is a flaw in the methodology. The National Planning Policy Framework states:
 - “If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt.”
 - “When defining boundaries, local authorities should: ... define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”

The first (see NPPF paragraph 86) sets out the test of whether a village should be inset; the second (see paragraph 85) sets out considerations for when defining a boundary. The Pegasus study combines the two processes and scores the presence/absence of permanent physical features to define a boundary as a criterion for determining whether a village contributes to the openness of the Green Belt. This criterion should not determine whether a village is inset.

- There is inevitably a limit to what can be achieved through site survey, aerial imagery and Ordnance Survey mapping. The locations of woodlands, hedgerows, tree belts, and highway and railway infrastructure surrounding each village were mapped as possible boundary features rather than as determinants of openness. Rights of way, such as footpaths, and amenity space should be considered from which the open character of a village or its contribution to the openness of the Green Belt might be appreciated. Given the topography of Guildford, views onto villages can be of great importance and need to be taken into account.
- The way trees and topography were considered is of concern. The study assumes a village surrounded by trees does not contribute to the openness of the Green Belt but concedes surrounding woodland could be appreciated from within an open village. “Open” in a Green

Belt context relates to absence of development. Woodland is a highly valued Green Belt land use. Guildford Borough has a policy of encouraging soft green edges to settlements which contributes to the open character of the Green Belt and softens the impact of settlements. A village that adjoins woodland can contribute greatly to the openness of the Green Belt even if the appreciation of the contribution of the village is at shorter range and more distant views are more screened. Seasonality also needs to be considered.

- The overall scale of a village should be considered. A compact small village may contribute to the openness of the Green Belt as much as a larger more linear village.
- The way density is taken into account needs careful consideration. Inclusion of higher density development within a village should not necessarily lead to a conclusion that a village fails to contribute to the openness of the Green Belt. Some higher density housing makes a very positive contribution and does not detract from an overall impression of openness. Also, suggesting inclusion of some higher density homes within a village detracts from Green Belt function will discourage sensitive provision of affordable housing.

In a by no means exhaustive list, we suggest that the proposals to take Normandy, Send, and Wood Street out of the Green Belt are reconsidered given the important contribution of these villages to the openness of the Green Belt and the valued vantage points into and from Green Belt woodland. We suggest the proposals to remove Effingham, Normandy, Shalford, and Wood Street from the Green Belt are reconsidered on the basis that presence of physical boundary features does not determine whether a village contributes to the openness of the Green Belt. We are certain local knowledge will identify further considerations.

Getting inset decisions right is critically important, not only for the integrity of the Green Belt countryside, including its villages, but also because local authorities are required to:

- “consider the consequences for sustainable development of channelling development
 - towards urban areas inside the Green Belt boundary,
 - towards towns and villages inset within the Green Belt or
 - towards locations beyond the outer Green Belt boundary”.
- “take account of the need to promote sustainable patterns of development”, and
- “when defining boundaries, ... ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development”.

POLICY 10: Green Belt and the countryside

GRA Response

We **object** to this policy. It does not mention the need for permanence of Green Belt boundaries (NPPF para 79). It does not define the exceptional circumstances required to change Green Belt boundaries (NPPF para 83). The GBC topic paper on housing claims that the decision by Bath & North East Somerset Council to build on the Green Belt justifies a change of Green Belt boundary in Guildford to allow domestic and other building. The scale of building proposed in the Green Belt at Guildford is vastly greater than at Bath and the strategic sites in Guildford can hardly be described as “highly sustainable”.

The first sentence of the Policy should end after “...with national planning policy”. There is more to defend than “its openness and open character”.

Paragraph 4.122 needs to go into the blue box and the references to the NPPF should be specified.

Reasoning:

The analysis of Green Belt in pages 52 and 53 is wholly inadequate as a basis for review of Metropolitan Green Belt around Guildford. A far more strategic assessment is required, especially given the recent letter from the Planning Minister that “unmet need alone” is unlikely to justify housing development in Green Belt.

The absence of a strategic vision/masterplan and an approved housing target for the borough makes it harder to assess if development needs could be met by redevelopment of a range of town centre and other urban sites. Even if “exceptional circumstances” can be proven for development in the Green Belt we believe none should occur at the Strategic Sites (Gosden Hill Farm, Wisley airfield and the Hogs Back) until the Council proves that this is necessary at each strategic site and large-scale development is the most sustainable solution. It is imperative, that any such plans include appropriate and funded infrastructure proposals along with evidence that they will not exacerbate existing traffic flow problems. We also believe that all public sector institutions (University, Hospital etc.) must engage in a meaningful way on their strategic plans before any planning applications are submitted. It should be incumbent upon such institutions to demonstrate that they are making wise use of their current resources before GBC grants them further permissions to expand.

The Green Belt and Countryside Study remains deeply flawed for the following reasons and should be withdrawn:

- Not based on an overall strategy view of how the borough should develop. It is piecemeal in approach.
- Unacceptable definition of sustainability – it is used simply to mean proximity to facilities
- Does not recognise the “very special circumstances” required for Green Belt development or the even stronger protection for the AONB.

POLICY 11: Ash and Tongham Strategic Location for Growth**GRA Response**

We **support** this policy but have the following query:

“In order to protect Ash and Tongham and Ash Green we will designate an Area of separation between Ash and Tongham urban area and Ash Green to ensure that the settlements retain their individual character and prevent their merger.”

Why is the same consideration not being given to other areas of potential coalescence e.g. Onslow Village and Park Barn /Wood St Village which are being brought together by the proposed Blackwell Farm strategic site?

POLICY 12: Historic environment**GRA Response**

We **object** to this policy as it is written. The wording is too general and the supporting paragraphs do not enable the reader to see if the intended approach is adequate to achieve the policy or compatible with the economic, social and environmental policies in the Draft Plan.

Reasoning:

This policy is too general. The following statements

1. “..we intend to review our conservation area whilst also considering whether we should designate any new conservation area”
2. “We are in process of producing a series of Conservation Area Appraisals”
3. “We will further develop our strategy towards the conservation of the historic environment in the Local Plan: Delivery Development document....”

indicate that the required work has not yet been done to make more specific proposals which, in turn, means that that any required investment plan cannot be prepared. This is another indication that the Draft Plan is not yet ready for consultation with residents and supported by an adequate evidence base.

Further, when will the “Delivering development” document (Draft Plan page 57) specifying “the large number of undesignated heritage assets” be available for public review and comment? We suggest a list of historic sites be prepared and maintained with an action plan proposed for each. This will support, and the posed actions should be integrated with, the drive to increase tourism.

POLICY 13: Economic development

GRA Response

We **object** to this policy as it is written. The wording is poor and is insufficiently specific as to the sort of industries we wish to attract. This needs to be clarified so it can be seen whether the land provision is adequate and appropriate. Until it is proven that there are exceptional circumstances, there should be no encroachment of employment land into the Green Belt.

The objective of this policy must surely be growth in value added (GVA) to meet the targets in Surrey’s Economic Strategy. This is surely more important than the items proposed for monitoring. Unemployment is currently low in the borough and so a focus on monitoring jobs created can be misleading and is a secondary objective.

Reasoning:

We agree that Guildford should promote balanced and sustainable economic development and that the economic viability of the borough and success of our businesses contribute to “improving the quality of life and prosperity of local residents”. We note however, from NPPF para 8, that the three dimensions to sustainable development (economic, social and environmental) are mutually dependent and gains in all three should be sought “jointly and simultaneously through the planning system”.

We would therefore welcome the Vision statement in this Draft Plan being more explicit as to the sort of world class business it intends to foster and evidence that it integrates with the social and environmental Plan objectives. The GRA supports seeking investment in our knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the wealth necessary to fund the infrastructure and environment this sort of industry requires.

Such industries include creative industries, new technology, medical & veterinary advances, e-commerce and home working. It is important to recognise significant changes in the nature of retailing, the qualities that attract high technology, medical and creative businesses and the shift to use of virtual links for business.

We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for space hungry businesses. So we should target high added value small and medium sized enterprises rather than the headquarters of larger corporations, as is mentioned on Page 60.

We note that according to the Office for National Statistics, the current employment rate for the borough is less than 69%, down from an average of 73.2% in 2012, which in turn was down from 80.1% in 2011. Traditionally Guildford has had a higher employment rate than both the South East and England as a whole. According to current statistics this is no longer the case. The current employment rate for the South East is stable at about 74% and England at 71%. Across England the employment rate is slowly increasing and for this ratio to be falling in Guildford borough is of concern and should be understood. It reinforces the importance of using up to date data to inform the plan and the need to include a risk analysis and acknowledge uncertainty.

We caution against over expansion of retail floor space and question the wisdom of the proposed massive increase in area, notwithstanding a current trend for retailers to concentrate on a smaller number of large retail centres. We should diversify use of the town centre.

Far more rigorous analysis of the future contribution of the retail sector to Guildford's economy is required for several reasons:

- Before decisions are taken on significant retail expansion within a North Street redevelopment, the likely effect on the Upper High Street, Tunsgate, the Debenhams site and the High Street itself should be better understood.
- Premises no longer required for retail use could be an important potential source of business and residential sites. The Employment Land Assessment should consider this. We note that in the base report (Working Futures) which informs the Employment Land Assessment, all scenarios predict an increase in retail employment in the borough by 2031 of about 1,150. This is an increase of 11% above the employment level in 2006. We question the validity of this assumption. For example, in its 2013 report, the Centre for Retail Research forecasts that 11% of retail outlets in the South East will close by 2018. Their forecast is that retail will continue to decline beyond 2018. As a rough indication, if 11% of retail outlets close in the borough by 2018, this could release in the order of 2.6 ha of floor space (assuming average unit size) for other uses or redevelopment.
- A forecast increase in internet shopping is used to predict additional employment from warehousing and distribution facilities locating in the borough. The likelihood and sense of providing for 7.3/9.9 ha of warehousing and distribution centres in the borough is debateable. Warehousing and distribution for internet shopping is a low margin business. Given the scale of distribution networks, how likely is it that this type of operation will choose to locate in a high cost environment where land is at a premium and with serious traffic congestion?

We look for the Plan to set out an imaginative approach to how the town centre, Research Park/ University/ Hospital area, Slyfield and other business sites can be enhanced to support and attract innovation and enterprise. GBC should facilitate more integration between these areas. Transport links should support integration. It would be undesirable for business parks to become divorced from the town centre and only accessed via the A3 and the infrastructure delivery plan must address this.

The spaces we create for innovative enterprises should be attractive, respect our green and historical assets, provide underground parking wherever possible and, more generally, make greater provision for their traffic and parking impact.

We should retain small scattered business estates hidden within communities. We should protect space within communities for small businesses such as printers. There is a limit to how many business units should be converted to residential and the business relocated to Slyfield. We need sufficient space on Slyfield for housing if this to become a diverse and integrated part of the town.

There needs to be far greater understanding of the significant proportion of employment that is in rural areas. There is potential for technology to make this an ever more sustainable option and the growth in home working reduces the need for businesses premises. However, there are concerns that businesses unrelated to the land are using adapted farm buildings because of more relaxed planning, and that the countryside will become urbanised. Small, sensitively-located sites for appropriate rural businesses are required. In the Area of Outstanding Natural Beauty, the statutory purposes of conserving and enhancing the landscape and scenic beauty should prevail and shape the economy.

An area that merits attention is the land along the river corridor of Walnut Tree Close and Woodbridge Meadows. It lacks identity. It includes business estates that are attracting some retail development of a kind that could draw trade from the town centre, a trend that should be resisted. Consents have been given for large office redevelopments, student accommodation and also for high density, high rise housing. Parts of the area are at significant flood risk not just from the Wey overtopping but also due to rapid surface water runoff. A comprehensive supplementary planning document is needed for this whole area. The National Planning Policy Framework would favour business over residential use in vulnerable parts of this area (sequential test). Whatever the appropriate mix of homes and businesses, the area should be greatly enhanced to provide:

- A strong sense of identity that makes much more of the Wey Navigation
- Continuous riverside access
- Sustainable drainage and channels rather than raised riverside car parks that add to flood risk and detract from amenity
- A building line set back from the waterside and
- A limit of 4 to 5 storeys at most, fewer by existing homes and the river.

We do not find the points we refer to adequately addressed in the Evidence Base.

POLICY 14: The leisure and visitor experience

GRA Response

We **object** to this policy – it is weakly written and inadequately specific.

The word “expect” in the first line is not adequate. Surely the Council should object to any proposal that stands in the way of providing this.

“This policy underpins our ambition to prepare a Visitor Strategy”. Surely this should be there now in the Evidence Base.

The reference to “low and ultra-low emission vehicles” in the policy is odd as GBC has no control over the achievement of this aim.

Paragraph 4.164 should also include the National Shooting Centre at Bisley.

Reasoning:

This is a poorly drafted section in part reflecting the failure to appreciate the positive links between:

- Guildford’s green and historical character and how we wish to preserve it.
- The rich cultural life of the borough and how we wish this to develop,
- Our economy and how we intend it to grow.

With care, the sectors of our economy that rely on the environmental and cultural attributes of our borough can thrive and increase significantly alongside growth in our knowledge based, high technology sectors. At present, we are not poised to achieve this. The tourism and cultural sector of our

economy is being treated as “assorted odds and ends” tagged on to the mainstream economy and there is a perception that to expand our mainstream economy we need to overcome constraints and expand.

We should treat Guildford’s culture and environment as the foundation of a strategy for the benefit of residents, visitors and the economy. We should consider both what we currently enjoy and what we want for the future. If we can get this right, we will:

- Sustain the wellbeing of the community,
- Build a strong visitor economy,
- And also support our high technology, knowledge based economy.

We believe that the environmental character and cultural richness of Guildford plays a critical role in attracting dynamic post-doctoral academics seeking to exploit the commercial potential of their ideas.

We should make much more of the opportunities provided by the:

- River Wey that runs through the town and opens out into attractive water meadows.
- Surrey Hills Area of Outstanding Natural Beauty, landscape status equivalent to a National Park.
- Distinctive character of our communities, countryside and open spaces.
- Integration and use of our historical buildings as part of the fabric of the borough.
- Diverse range of cultural and sporting venues.

An integrated strategy for “Guildford’s culture and environment: heritage and aspirations” should be developed including ecology, heritage, entertainment, retail, social, rural, sport and business tourism, to ensure we develop in a way that both protects our critical assets and also supports the development of our niche markets such as the film industry. It should include a comprehensive listing of attractions in the villages as well as the town.

POLICY 15: Guildford town centre

GRA Response

We support the decision to create a vision but **object** to this Policy because it is insufficiently specific. The expression “build on these assets” is inappropriate and could be seriously misleading.

We believe the monitoring section should include measures assessing the risks being taken in such a proposed expansion in retail space e.g. shop vacancies

Reasoning:

Guildford is in a vulnerable position with the prospect of significant town centre change and redevelopment taking place with neither an up-to-date plan nor an up to date planning brief in place. We supported the creation of a Vision document but until a Supplementary Planning Document (SPD) is in place we remain vulnerable. We suggest we cannot wait until adoption of the Local Plan to produce a new Town Centre SPD. We propose that a draft should be produced in parallel with the Local Plan consultation even if for some legal reason it cannot be adopted until later.

The absence of a town centre plan also hampers effort to identify how many homes can be accommodated there. It is not possible to determine whether we need to develop in Green Belt countryside without GBC having decided the housing target and set out the options for meeting this target.

The Allies & Morrison “Vision for Guildford” and a proposed Town Centre SPD.

We support the decision to employ specialists to develop a masterplan for the town centre though we believe their brief was set too narrowly and should have covered a larger physical area of the town. We believe that the challenge now is to evaluate this “Vision Document” and incorporate the appropriate parts into an SPD as part of the planning process.

Residents do not want Guildford to become just like any other town. Our scenic, historic High Street, with alleyways, views onto Area of Outstanding Natural Beauty and potential river setting, provides a unique shopping experience. That distinctiveness has great commercial and visitor value. The High Street remains vibrant in part because enormous effort goes to ensuring it adapts to retail needs while retaining character. We must guard equally against loss of character and marginalisation as a boutique area if the major retail focus is moved towards the north side of North Street. Impact on the viability of the High Street should be an important consideration in assessing any proposals for town centre development.

Great care is needed to ensure that North Street is developed in keeping with the character of the High Street rather than as a “could be anywhere” shopping mall. We would like North Street to be enhanced in a way that it too enjoys great views and provides a variety of well-designed shop fronts that follow the rise of the land. The aim should be to create such an attractive mix of outstanding new buildings with enduring appeal and retained original buildings, that North Street becomes as worthy of protection in the future as the High Street is today.

It is essential to avoid over-expansion of retail floor space given the rise of electronic shopping, notwithstanding the trend that retailers are reportedly concentrating in a smaller number of larger centres. We should keep a range of short stay car parks, including some surface car parks, to support convenience shopping and plan innovatively to enable people to collect from shops items ordered electronically. Otherwise pressure for out of centre locations will increasingly draw custom from the High Street.

We should retain public rights of way along streets in town centre developments creating new quarters rather than “shopping centres”.

We must be realistic about the extent of pedestrianisation that will be appropriate beyond the High Street. We do not support full pedestrianisation of North Street because this would cause unacceptable congestion on York Road and other surrounding residential roads. Perhaps the bottom section of North Street only could be a “shared space” with buses and pedestrians. Roads converge in the centre of the town to get across the gap in the downs and Guildford does not have sufficient road capacity to divert traffic around the centre.

Providing space for a very attractive and central, state of the art bus interchange with connections to all parts of Guildford will be essential to reduce car dependency for journeys to the town centre and to transform attitudes to public transport. We need pick up and drop off points near all key facilities and links to the railway station.

We should consider impact on the roofscape when development is proposed and respect topography by resisting inappropriately tall and bulky buildings. We would welcome more housing in the town centre in mixed developments but this should not be achieved by adding extensive level areas on top of buildings and destroying the stepped character of the area. Views onto the town centre are being destroyed by large buildings with ugly rooflines that ignore Guildford’s gap town setting.

We welcome the proposal for more restaurants and cafes. The area around the cinema has the potential to create a very attractive restaurant quarter around a square opening onto the river, perhaps with a

small marina. Appropriate flood water storage and resilience measures should be integrated into the design.

More generally, we should integrate the river more fully into the High Street. Care needs to be taken to enhance the centre of Guildford in ways that do not just extend the current gyratory congestion outwards into surrounding residential communities.

Major development has also been proposed for the station area of Guildford. A Town Centre Supplementary Plan needs to be in place before any application is agreed. This should provide for:

- access to the river,
- an attractive pedestrian link to the town centre
- excellent bus services and pick up and collection arrangements on both sides of the station
- no buildings above four to five storeys
- land safeguarded for another road bridge over the railway to better connect the town
- provision for a future Heathrow rail link

A detailed study should be carried out, taking into account the proposed developments, looking at traffic, bus facilities, pedestrian and cycle movements. The output should include a preferred solution, building on the A&M Vision, GTAMS and the items in the previous paragraph, and used to inform the SPD.

POLICY 16: District and Local Centres

GRA Response

We **support** this policy.

Reasoning:

We agree that district and local centres are a focus for communities. However development must be in line with the character of individual centres, be they in villages or in the urban area.

Within the “Guildford urban area”, we also want to defend the diversity and identity of local centres by encouraging small local shops and a range of appropriate community cultural and leisure facilities. There is a concern that the Draft Local Plan treats communities outside the town centre as part of a homogeneous urban area. Proposals should draw on evidence in a Guildford Residential Character Areas study.

The Plan needs to provide a strategy for ensuring local centres are not swamped by large new supermarkets. A framework to guide local application of the “sequential test” in Guildford is essential. (This is a national policy designed to give priority to town centres rather than large out of town retail centres.)

Appropriate locations for supermarkets should be identified in the Local Plan, rather than opportunistically as has happened recently with more attention given to adequate car parking (only mentioned at the end of paragraph 4.195).

The Plan should also take account of retail areas such as Ladymead and Woodbridge Meadows where retailing of a kind traditionally located around the High Street is emerging. These areas should specialise in the retailing of bulky goods you are likely to need a vehicle to collect.

We support a tightly drawn town centre boundary. We should retain the green, residential character of routes connecting the town centre to other business areas. We welcome the clear distinction between

the town centre and the residential character of adjoining suburban areas. We also agree with excluding the business park areas to the northern end of Walnut Tree Close.

We ask for South Hill, Warwick's Bench and Castle Hill to be removed from the town centre boundary. These are residential roads with houses of great character and Warwick's Bench serves as an approach road into Guildford. The Residential Design Guide and Landscape Character Assessment would support their removal.

POLICY 17: Infrastructure and delivery

GRA Response

We **object to** this policy as it is currently written. It is not backed by adequately developed proposals to allow us to judge if they will allow the objectives of the draft Local Plan to be achieved.

The paragraph on “In negotiating planning applications...” gives concern that developers will be compensated for over paying for land at the expense of the community, either through lowering standards or not providing adequate infrastructure. The paragraph should be deleted.

Reasoning:

Strategic vision is needed to address the factors impeding the sustainable development of Guildford’s high added value economy and safeguard the quality of life for residents. Ever more piecemeal development without adequate assessment of cumulative impact or contributions to necessary investment will not do. Guildford is one of the most competitive non-metropolitan centres in the UK. It contributed a gross value added of £3,830 million to the economy in 2007. If success is to be sustained, Guildford merits a greater share of national infrastructure investment.

We therefore welcome the proposal to produce a living draft Infrastructure Delivery Plan (IDP). However, it is not acceptable that this is not yet available for review during this consultation especially as GBC has limited or no control over the infrastructure to be provided by other bodies (Highways Agency, SCC, Thames Water etc.). In the foreword to the plan the Leader of the Council states “...and over many years the town’s infrastructure has been neglected” We fully support that view. We believe that the poor linkage between the various bodies responsible for infrastructure provision to support the economic, social and environmental needs of the borough, has been lacking and therefore inadequate. The Plan should set out how this problem will be addressed in future.

The IDP must set out how:

- Measures to tackle the current infrastructure deficit and the capacity and other improvements required to deliver growth, will be tackled together to ensure ambitious, efficient and strategic approaches are adopted.
- Long term aspirations will be broken down into manageable delivery phases capable of being funded from a variety of sources e.g. developer contributions, business rate receipts, Enterprise M3 Partnership funding, partner contributions and, where appropriate, national infrastructure funding. The scale of the problem is such that more funding will be required than just from developers’ contributions alone

GBC must move quickly to identify any sites that need safeguarding to prevent development that would impede subsequent construction of critical infrastructure e.g.

- A new **bridge across the railway/river to unify the town**. There are too few links between the west side and High Street side for a town the size of Guildford. Without tackling this capacity issue, severe congestion on all routes converging in central Guildford will be inevitable.

- A state of the art **central bus interchange, with full connectivity to all sides of Guildford**, to integrate the town and make a car less necessary for getting about. The buses and the interchange should be very attractively designed to challenge perceptions and reach new markets. Far more imagination needs to go into the timing and routes of journeys to entice more of us out of our cars. The reliability of the bus services should be monitored along with the provision of more bus stops and electronic time tables throughout the borough. Links to railways stations should be provided. (Attitudes to recycling have been transformed in recent years. A comparable shift in attitudes to the use of buses and the services provided is required.)
- Provision of **improved sustainable transport to reduce reliance on a car for getting to work**. More **park and ride as part of the mix** of provision to support those who travel into Guildford to work. Parking should be underground wherever possible and appropriate and contributions made by developers and employers.
- A **Heathrow** rail link.
- **Improved A3 junctions** to serve the town until a longer term solution for the A3 is implemented.

The Highways Agency should undertake a study of the A3 through Guildford as a matter of urgency, taking into account the growth included in the draft Local Plan. The HA recognises the existing problems and the challenge that growth in the area will present (see M25 to Solent Route-based Evidence Report, Highways Agency, March 2014). However, there are no schemes in the current programme to tackle the problems. The Enterprise M3 LEP regards improvement of the A3 from the A31 to the M25 as being of strategic importance (Enterprise M3 Strategic Economic Plan, March 2014). The Options Growth Scenarios Traffic Assessment Report prepared by SCC for GBC (January 2014) makes it clear that development of the scale included in the draft Local Plan will add to congestion on the A3. An early priority for the study would be to establish the most feasible route and land requirements. If a tunnel entrance in Gosden Hill would be a favoured route, the necessary land should be safeguarded. Land would need to be safeguarded for an entry on the north side too and construction sites planned.

It is surely sensible to ensure that development is coordinated with highway improvements, not pursued in advance at the risk of creating much worse conditions for all road users.

The Local Transport Strategy for Guildford, produced by SCC, is intended to be in draft in July 2014, and to contain a schedule of scheme, for consideration by the Local Committee. The published timetable says that this will be available for public consultation in September 2014; after this draft Local Plan consultation has finished. We hope that it will be informed by a new scenario test, run by the SCC team, developed using the draft Local Plan developments.

We also need a far more forward looking approach to water supply, sewerage provision, landfill remediation and flood risk management. The failure to bring forward investment to relocate the sewage works at Slyfield prevents the development of new dwellings on the site providing a viable development can be accommodated on land outside of the flood plain. We do not believe that plans should include buildings above 5 storeys on this site respecting the character of the town's urban area. The importance of the Slyfield/Burpham flood plain in protecting the centre of Guildford from flooding was demonstrated just last winter.

POLICY 18: Sustainable transport for new developments

GRA Response

We **object** to this policy as it stands. The proposals are insufficiently developed for us to judge if they will adequately support the developments in the draft Local Plan. Also the wording should be more forceful in tone – change “We will expect” to “We will ensure”.

It is unclear how GBC will “facilitate the use of low emission vehicles”.

Reasoning:

A large number of people commute into and from Guildford for work and, no matter how many homes are built we will not change that pattern. Also relatively narrow roads converge in the town centre and come together to pass through the downs leading to traffic congestion **now**.

Given these factors, new development should be conditional on delivery of an ambitious phased investment strategy. In the words of the Guildford Economic Development Study, “Transport infrastructure underpins economic performance through connectivity – linking business to business and people to employment opportunities””

Given the constraints on land availability, it is unlikely to be possible to choose between locations for development based on minimising travel. It will be more realistic to provide transport options that are as sustainable as possible where land is available. It may be necessary to rule out some locations due to unacceptable congestion, at least until improved transport solutions are in place.

We strongly oppose the approach that proximity to transport trumps other factors when considering new development. Impact on character can be just as important in terms of sustainable development. For example, being close to a bus stop or railway station does not make high density development that harms character acceptable. “Distance from facilities” is used inappropriately, as a surrogate for sustainability, in the Evidence Base. This, along with the relative neglect of impact on character, could distort decisions on development location and density.

No further significant town centre development should be allowed that will increase traffic on the gyratory and feeder roads until a sound transport and funding strategy is in place. We must ensure that any development that occurs before the new plan is adopted, at sites such as the Waitrose development, is compatible with transport capacity, does not jeopardise future plans and contributes to transport and parking solutions.

We attach great importance to all new business and residential development making contributions to transport infrastructure. We are concerned that, because Guildford is so far behind with producing a Community Infrastructure Levy Charging Schedule based on the Local Plan and accompanying Infrastructure Delivery Plan, we will miss out on being able to charge developers a Community Infrastructure Levy to contribute towards essential infrastructure. The problem is made more pressing by the fact that, from April 2015, we understand it will no longer be possible to charge developer contributions if more than five contributions have been pooled for that purpose since 2010. This puts at risk the assurance in Policy 17 that “We will ensure that infrastructure needed arising from a proposed development is provided and available when first needed to serve the occupants and users of the development.”

We would support:

- An improved access to Slyfield, but it is essential that the chosen way of doing this does not interfere with the functioning of the Slyfield/Burpham flood plain and takes accounts of the currently overloaded traffic situation in the Clay Lane/Burpham area and other planned and possible developments, such as the Aldi proposal and that at Gosden Hill Farm. The Slyfield development should include a bus service from a park and ride.
- The proposal for a new railway station on the existing railway line at Park Barn. This would help serve the local community, where we propose redevelopment to enhance the area, and also the University, Research Park and Hospital.

Regarding the town centre, we cannot yet support the Allies & Morrison scheme as far as the road network is concerned on the grounds that it is just an idea at this stage. There has been absolutely no analysis of the implications of this scheme. We do not regard the SCC model SINTRAM as a suitable

tool for dealing with the level of detail required in looking at the town centre. What is needed is a comprehensive study of town centre movements, road traffic and buses, cycling, pedestrians and parking, with a local model. It is interesting that the parking strategy, adopted by the council in 2013, does not appear in the list of Key Evidence for the town centre (P15).

We note that the Draft Local Plan makes no mention of additional highway capacity even though the evidence points to a need for this.

We are disappointed that the GBC commissioned Guildford Town and Approaches Movement Study was not informed by studies based on the developments included in the Local Plan. Also the only ‘major’ scheme in the plan is the Sustainable Movement Corridor (App B 2.1.1) which has not been properly analysed at all, even though the cost quoted is £75-100m. It must be acknowledged that this corridor would only benefit a small part of the borough.

POLICY 19: Green and blue infrastructure

GRA Response

We **object** to this policy as currently drafted. The wording is not sufficiently specific to indicate what is intended. For example, we would strongly object to the word “enhance” if this meant turning natural, unspoilt countryside, such as Chantry Wood and Tyting Farm, into urban parks.

Reasoning:

Residents need a more precise statement of intent to judge if this policy is adequate and appropriate. We must:

- Preserve our attractive, accessible countryside, gardens, allotments and natural open spaces.
- Retain the green character of the edges of Guildford, and of its approach roads.
- Make the green corridor along the river much more of a feature and protect views throughout the borough.
- Ensure new developments contribute to creating distinctive places and a sense of community, not “could be anywhere” estates, and provide well designed spaces for vehicles to reduce the dominance of parked cars on streets.

More specifically, the Plan should set out steps to:

1. Protect the designated countryside around Guildford, in particular the Green Belt and Surrey Hills Area of Outstanding Natural Beauty (AONB), and support the Area of Great Landscape Value becoming AONB.
2. Protect green Public Open Spaces and their individual characters in the Local Plan. Resist turning natural, unspoilt countryside, such as Chantry Wood and Tyting Farm, into urban parks in the name of attracting visitors away from the vulnerable Thames Basin heathland wildlife areas. Residents are not convinced that the ‘Suitable Alternative Natural Greenspaces’ (SANGS) approach achieve this purpose and recommend a review of the concept.
3. Ensure any SANGS provide genuinely new opportunities for informal recreation in newly created areas of high potential wildlife value rather than simply a rebranding of areas already enjoyed by residents for their natural beauty.
4. Ensure the amenity value and distinctive character of open land owned by GBC is fully recognised and enhanced by appropriate management to protect such land against:
 - harmful development (e.g. Stoke Park),

- noise pollution (e.g. Riverside)
- insensitive management (e.g. flailing of trees and shrubs on the ancient track way of Green Lane or the addition of urbanising clutter on the Chantries, Pewley Down and Tyting Farm).

5. Secure the future of the valued qualities of Council owned farms, including Burpham Court, Tyting and South Warren Farms, for the benefit of the community in perpetuity and ensure their management is resilient to anticipated changes in stewardship payments.

6. Retain current allotment sites for community benefit.

7. Designate adequate green space, allotments and public footpaths in new developments so they provide public benefit in perpetuity and are not lost within the curtilage of properties over time or developed.

Comment on Sites Identified in the draft Local Plan

Individual GRA members are leading in commenting on the sites identified in the draft Local Plan. The GRA will support its members in discussions on specific sites where it can add value. We will make further comment on individual sites when the infrastructure proposals for each site have been more clearly identified.