

# **Guildford Borough Proposed Submission Local Plan: Strategy and Sites 2017**

## **Consultation Response from Guildford Residents Association July 2017**

**Please note this response includes an Appendix  
which is a separate document:  
“Review of GL Hearn’s Guildford Addendum to the West  
Surrey SHMA”**



**Guildford Residents Association comprises  
over 26 Residents’ Associations and Parish Councils  
who support the GRA's statement of residents  
"Aspirations for Guildford".**

**Our vision is for all Guildford residents to enjoy a good quality of life in a healthy,  
enriching environment within caring communities. Achieving this requires Guildford to:**

- **cherish its market town legacy, garden suburbs and downland setting,**
- **encourage innovative, sustainable development of its high added value economy, building on Guildford’s current strengths and correcting its weaknesses.**

## Question 1: The evidence base and submission documents

### West Surrey Strategic Housing Market Assessment: Guildford Addendum Report 2017

The revised “objectively assessed need” figure of **654 homes a year is too high and not based on sound evidence**. This GLHearn number is derived from a demographic need for 558 homes a year, a figure which analysis of the evidence shows should be reduced to 404. The economic need assessment uses a flawed methodology.

GRA commissioned Neil McDonald, a respected national expert who used to work for the Government, to undertake a review of the 2015 West Surrey SHMA as it relates to Guildford. This assessment concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure for Guildford should be revised down. Neil McDonald also advised that a separate SHMA should be produced for student housing requirements in Guildford due to the distorting effect of student flows on the overall Objectively Assessed Need (OAN) forecast.

Neil McDonald has now undertaken a review of the 2017 West Surrey SHMA Guildford Addendum Report. See Appendix 1 for a copy of this which forms part of our response. (The Executive Summary is also reproduced in a text box for convenience.) As part of this review of the addendum report, he undertook a more detailed assessment to identify what causes the very large discrepancies between projected population growth in Guildford and actual growth as recorded in the census.

Neil McDonald has concluded that the demographic and economic need figures are fundamentally flawed to the extent that GBC cannot make an informed, evidence based decision on the housing figure. His analysis of the big gap between demographic projections and census figures in Guildford identifies under-recording of students moving away as the most plausible explanation. The ONS recognises that there are significant issues. His analysis also shows that if you correct for this recording error by making plausible adjustments for the outflow of students in the period 2001-15, this reduces the demographically-based estimate of the number of homes needed from 558 to 404 homes a year in the period 2015-34.

## Executive Summary

i. This report reviews key elements of GL Hearn's report, "West Surrey Strategic Housing Market Assessment: Guildford Addendum Report 2017" that relate to Guildford's objectively assessed need for housing (OAN). It follows up an NMSS report in June 2016 on the aspects of the West Surrey SHMA that related to the Guildford OAN.

### **Producing projections for Guildford is challenging due to the large number of students and errors in the historical data**

ii. Guildford presents many challenges to those seeking to project its future population and household growth. This is because it has a large student population and the historic population data for the district contains sizeable inaccuracies. The latter point is clear from the Office for National Statistics' own data which shows that the population increase between 2001 and 2011 estimated using the ONS's figures for births, deaths and migration flows (i.e. 15,000) is more than 90% larger than the increase suggested by the difference between the 2001 and 2011 census counts (i.e. 7,800). This is an exceptionally large discrepancy and indicates that there were large differences between how the ONS thought the population of Guildford was changing between 2001 and 2011 and what was actually happening.

**It is probable that out-migration from Guildford has been under-recorded and, as a result, the DCLG projections have over-estimated the likely increase in households by a large margin.**

iii. A detailed examination of the discrepancies between the various ONS datasets has shown that the only plausible explanation is that net migration into Guildford has been over-estimated, most probably as a result of a sizeable under-recording of migration out of Guildford.

iv. It seems probable that the under-recording of out migration has continued after 2011. This has major implications. In particular, the ONS's 2015 population estimate for Guildford may be too large and DCLG's 2014-based population projection may overstate the likely increase in housing by a substantial margin. An alternative calculation making plausible and logical adjustments to the estimated outflows in the period 2001-15 would reduce the demographically based estimate of the number of homes needed from 558 homes a year (2015- 34) to 404.

**Student housing needs are probably already catered for in the DCLG projections but a much fuller separate analysis is needed.**

v. An examination of the DCLG projections for the growth of households of the type and age formed by students renting in the general housing stock in Guildford suggests, contrary to GL Hearn's conclusion, that those projections include more than enough additional housing to meet the projected growth in the student population. However, there is a need for a fuller analysis which separates out student housing needs from other housing needs as the DCLG household projection methodology is not suited to estimating the needs of students and the inclusion of students in the statistical base used for the projections may have distorted the projections made for non-student housing.

**The estimates of the number of homes needed to support forecast job growth need to be re-worked.**

vi. The GL Hearn estimates of the number of homes needed to support economic growth are flawed as they use economic activity rates which are different from those used in the job forecasts on which they have based their estimates. This can have a large impact on the estimate made of the number of homes needed to support job growth, sometimes producing absurdly large figures. For example, if, when assessing the housing implications of a jobs forecast, GL Hearn assume that fewer people over 55 will be part of the labour force than was assumed when the forecast was produced:

- a. GL Hearn will estimate that a bigger population would be needed to supply the workforce assumed by the forecaster – implying a need for more homes than are necessary.
- b. The forecast will not be consistent with GL Hearn’s view of how the labour market will change. Indeed, had the forecaster used GL Hearn’s assumptions they would have concluded that the available labour force will be smaller and as a consequence forecast a smaller increase in jobs.

vii. The SHMA Addendum does not provide sufficient detail of the jobs forecasts for others to re-work the estimates of the homes needed to support economic growth. The unwillingness by some parties to release data assumptions is also an issue. Hence the only option is to invite GL Hearn to redo the analysis.

**Affordability adjustment**

viii. The earlier NMSS report showed that Guildford did not stand out from other Surrey districts in terms of affordability. It is a highly desirable place to live being surrounded by very attractive countryside yet with both a strong local employment base and good commuter links to London. Increasing housing supply beyond the numbers suggested by the demographic analysis would not have a noticeable impact on house prices: it would simply attract more people to live in the area.

**Further work is needed before we will have a sound basis on which to estimate Guildford’s housing needs.**

ix. This review has shown that attempting to estimate Guildford’s housing needs using the DCLG projections with little or no adjustment has introduced large errors. Considerable further work is needed before there will be a sound basis on which to estimate Guildford’s objectively assessed need for housing.

x. In view of the desire to make timely progress with the Local Plan, it is proposed that an early meeting is sought with Guildford Borough Council and GL Hearn to discuss these findings and consider a way forward.

The Guildford SHMA needs to be revised, and the proposals based upon it reconsidered, before the Plan can be viewed as ready for submission to an Inspector. We trust that GBC will now pursue this as a matter of urgency. Neil McDonald proposes a meeting with GLHearn in order for this matter to be resolved in the most timely way possible.

## Housing Delivery Topic Paper

Paragraph 3.11 should not be construed as suggesting residents' concerns were met. The sensitivity map still uses the questionable approach that land meeting several criteria is more valuable than an area of Green Belt that plays a pivotal role in one respect.

This should refer to Woking applying Green Belt as a constraint and that it would be perverse to harm the Green Belt in Guildford to protect the Green Belt in Woking. Delay in the proposed Woking Site Allocations DPD is not a credible basis for meeting their unmet need in a place that is as constrained as Guildford.

Paragraph 4.10 lists constraints and suggests they were applied but gives no detail to show that they were and how. This is only described later in the context of Woking need. Paragraph 4.11 moves straight to seeking to meet need without setting out that transport, landscape, flood risk and Green Belt constraints represent major issues. These paragraphs should set out clearly at the outset the constraints and their application. You can expand subsequently that initially, as a result of paying insufficient attention to constraints in the draft version of the Plan, you had advocated some development that you came to appreciate was unacceptable in planning terms.

Your suggestion in paragraph 4.11 that GBC can work to meet (supposed) need can only be made by **not** applying Green Belt protection, and by accepting traffic congestion will continue to be a major problem. Yet paragraph 4.11 even proceeds to suggest a big buffer can be provided in addition to an inflated need figure. The only concession is transport constraints in that some development will need to await transport infrastructure later in the plan period.

Paragraph 4.12 is also weak, especially in the context of the failure to set out the application of Green Belt as a constraint in the preceding text. The logic

behind “prior to removing sites, we first explored whether they could potentially be retained” is perverse. The focus should be on justifying removal from Green Belt not “removal from removal from” the Green Belt! The sites were inappropriate for removal from Green Belt in the first place for sound planning reasons. Similarly, there are strong planning reasons why Green Belt loss cannot be justified at various other proposed development sites within the Draft Plan.

In paragraph 4.15, the deficit from 2015 is overstated because need is overestimated.

Paragraph 4.36 is welcome, especially in view of the very large number of 798 permissions granted in 14/15

From paragraphs 4.39 on Green Belt, please refer to our comments in the Green Belt topic paper.

## **Green Belt Topic Paper**

This document provides the thinking behind relevant plan policies and proposals alongside the Housing Delivering topic paper. The approach to Metropolitan Green Belt lacks appropriate assessment at a more strategic scale.

The Local Context section is inadequate as a basis for applying policy.

Paragraph 2.10 - We challenge the assertion that the Corporate Plan sets out an overarching local approach to Green Belt and countryside. These corporate objectives were not subject to consultation appropriate for determining planning policy. The current Local Plan is the relevant local policy context.

The fact that there was a boundary review as recently as 2003, the amount of land released at that stage, and the extent to which it has been developed, including how efficiently the land is being used, should be recorded. Green Belt reviews should be infrequent.

Paragraph 2.11 - The reference to our Green Belt being designated to function as part of a wider Metropolitan Green Belt needs expanding. The objective of providing an effective open area around London maintained in

perpetuity requires a different scale of strategic approach than would be appropriate had this Green Belt been designed to serve Guildford uniquely. The 1987 Local Plan defined the Guildford part of the Metropolitan Green Belt not the Guildford Green Belt.

The section should also refer to the Mayor of London's commitment to respecting Green Belt boundaries, including in the London Plan review.

The evidence base section relies on the approach adopted in the Green Belt and Countryside Study. We sustain our previous objection and register concern that remaining flaws in the approach to Green Belt purposes are being carried through into new documents. As a consequence, the new evidence does not value appropriately the "fundamental aim" of Metropolitan Green Belt or look strategically at options for developing instead in major settlements beyond the Green Belt.

Inset villages - Assessment of which villages to take out of the Green Belt does not adequately consider that villages contribute to the openness of the Green Belt as seen from surrounding AONB.

Replacement buildings – We welcome refinement of this policy.

Inset major previously developed sites - Proposed removal from the Green Belt of a number of relatively small sites where development of an exceptional nature has taken place, plus adjoining land, has lost sight of the scale at which Green Belt is effective. We do not agree with the assessment in 4.32 for relatively small sites and consider any planning applications should be considered on a case by case basis as exceptional development rather than pock-marking the designated area with inset sites.

#### Amending Green Belt boundaries

The way Green Belt is parcelled up and scored is invalid: serving 2 Green Belt functions well is as legitimate as serving 3 to 5 functions. The Green Belt sensitivity analysis is not a valid basis for weighing the value of Green Belt and taking decisions.

#### Exceptional Circumstances

Paragraph 4.73 - This assessment is contested. The third sentence moves straight from need (based on a flawed OAN assessment) to amending boundaries without consideration of other options. It also refers to

unsustainable commuting patterns.

The potential contribution of sustainable commuting should be considered positively. Green Belt is inextricably linked with making good use of the urban area it encircles, and also with commuting. Half of Guildford's working population commutes outwards and half of the workforce commutes in. The pattern of locations is complex and includes places beyond the Green Belt. Building homes in Guildford will not change that pattern to any significant degree. The key is to make commuting sustainable and it should be embraced as part of Guildford's strategy just as it is for London.

Paragraph 4.74 – The logic is flawed. It suggests development “would not fundamentally harm the main purposes of the Green Belt”. This is hard to sustain given the main purposes of openness and permanence. It then suggests Green Belt constraint is being applied a little bit and further that in some instances this will take account of *how many* Green Belt functions a parcel of land serves. The focus should be the strategic importance of each part of the Metropolitan Green Belt. As has been mentioned, Green Belt that serves fewer functions well, eg providing a strategic gap, should be valued.

GRA is concerned that Guildford is allocating more Green Belt sites than it can justify and Green Belt constraint should be applied far more rigorously. The draft Plan is advocating a string of development along the A3 which is inconsistent with achieving a ring of open countryside around London. The minimum possible, least harmful loss of the Green Belt sites should only be considered after all other options have been pursued. That is not the approach that has been taken. Failure to apply Green Belt as a constraint only to be required to assess whether we can meet the unmet need of Woking, which did apply constraints, is perverse.

Local Plan Policy Approach – Paragraph 5.1 is tantamount to an admission that political decisions have been a major driver.

## Transport Evidence and Submission Documents

Assessment of the revised evidence leads to the conclusion that there will be congestion, even with all the highway schemes in the Plan. Many questions remain unanswered and further work is being undertaken. There will be problems across the network and analysis does not support a claim that the highways network can accommodate the additional demand arising from the Plan.

It is becoming ever more evident that the Sustainable Movement Corridor cannot be delivered as proposed or achieve its intended objectives along much of its route due to narrow roads and pinch points. Cycle provision can be improved but along much of the route bus improvements will be confined to a little easing at junctions leaving buses to sit in queues with other vehicles during peak traffic. The impact on other routes needs to be assessed.

Evidence on bus travel is fundamentally compromised because there is still no clear and workable location for a bus interchange to inform the evidence, policies and sites and to provide a basis from which bus routes can be planned.

More generally, uncertainty over transport planning for the **town centre** continues to be a problem. The Plan does not adequately address the traffic issues in the town centre including a route for a new bridge connecting the town across the railway to maintain accessibility and to provide greater resilience in this key part of the road network.

The following comments are provided by transport expert Richard Jarvis.

### **Doc Ref T12a Addendum to 2016 Strategic Highway Assessment Report: high level review of potential key changes in the Guildford Borough PSLP: strategy and sites June 2017**

This presents a qualitative assessment of the effect of the changes made to the 2016 plan on traffic forecasts. Essentially, because the amount of development in the plan has been reduced, GBC's argument is that things will be better than estimated in 2016.

We can readily agree that where development sites have been removed, notably as in the case of the Normandy/Flexford strategic site, the forecast traffic level will be lower in the vicinity of the development. However, there are some sites where the planned development is now greater than in 2016.

There are also potential changes to plans outside the borough to be taken into account, such as Dunsfold Park, which may have significant consequences for Guildford, as was pointed out by SCC and GBC in their submissions to Waverley in response to that planning application.

The trip rates used in the forecast assume a level of public transport use and an appropriate level of bus services.

On the evidence provided by the SHAR based on the 2031 traffic forecasts using the SCC traffic model, **congestion will be widespread in peak periods across much of the highway network, including on strategic routes. The A3 and M25 are forecast to be at or over capacity. The cumulative effect of the additional traffic generated by the developments in the plan will be to increase congestion, even with the proposed highways schemes in place.**

Interpreting the model results is not straightforward, as was pointed out in response to the 2016 consultation. Table 4.12 is significant – showing the roads with the ten largest ratios of flow to capacity for Scenario 3, which includes all the planned development but not the major strategic route improvements on the A3 and M25. There is no equivalent for Scenario 5 (i.e. with the strategic improvements), but we can infer that all the roads in Table 4.12 will be at or over capacity in Scenario 5.

With regard to the comments on Policy A6: North Street redevelopment (page 9), the model used for the Strategic Highway Assessment is not sufficiently detailed to provide a satisfactory assessment of conditions on the town centre road network. This has been recognised by GBC and has led to the commissioning of more detailed analysis using a simulation model. Added to which, there is uncertainty over the highway capacity implications of the Sustainable Movement Corridor in the town centre and possible changes to the town centre gyratory, as discussed in the draft Town Centre Regeneration Strategy, which indicates that the intention is to reduce the capacity of the town centre network. The experimental closure of Walnut Tree Close is already being planned. **Taking into account the demand forecast on the A281, the A322 and A31 in Table 4.12, the consequences of**

**such a reduction will be far-reaching.**

Policy A26: Blackwell Farm has been amended and now the proposed development includes a secondary school with up to six form entry. This will add to morning peak hour traffic which was not included in the 2016 modelling. **The SHAR findings indicate that there will be congestion in peak periods on the network that will serve this development. The A3 will be at or over capacity which means that the network will lack resilience, as it does today. The roads connecting to the town centre will continue to be under pressure.** The SMC concept is more advanced on this section than elsewhere, but the effect on capacity has yet to be established. **There will be queuing on the A31 on the approach to the new signalised junction that will give access to the Blackwell Farm site.** The A31 is regarded as a key route by the LEP and LA partners.

The improvement to the A3 is obviously critically important to the Gosden Hill Farm development. We do not have the benefit of analysis of the proposed new slip roads giving access off and on to the A3 S-bound carriageway, nor an understanding of the implications of the SMC for the allocation of highway capacity on the local roads. What is self-evident is that **the pressure on local roads in Burpham is already intense in peak periods, and these roads are not suited to carrying large volumes of traffic. Under the plan, congestion is very likely to be worse than today. The proposed Policy A24 Slyfield development will also add demand to the A320 and roads in Jacob's Well.**

The change to Policy A29: Land to the south and east of Ash and Tongham involving more houses means that there will be more traffic locally. While this will not be 'major' in terms of the borough as a whole, it will be significant locally. Ash and its surroundings will be impacted by the large Wellesley expansion in Aldershot. It is not clear to what extent the modelling reported in the SHAR allowed for this development. **The pressure on the A331 and the roads connecting Aldershot to Guildford and Woking will increase.**

The M25 is **forecast to be at capacity after the planned improvements have been introduced**, as shown both in the SHAR and also in the recently published DfT/HE report on the South West Quadrant. This is relevant to Policy A35 Wisley airfield. It should be noted that RHS Wisley is expanding its facilities with the aim of significantly increasing visitor numbers. The DfT/HE

Stage 3 report concludes that the focus should not be on widening the existing road further beyond currently planned schemes but on how to reduce pressures and provide parallel capacity to relieve this part of the network. If the M25 and A3 are at capacity, then the **Wisley development will add pressure on local roads that are not well-suited to carrying higher volumes of traffic. This is also relevant to the proposed developments at Burnt Common. The consequences for Ripley are likely to be serious.** It is noted that Policy A35 now includes a requirement for mitigation of impacts in Ripley and on surrounding roads, which is some recognition that there will be a problem.

A comprehensive up-to-date analysis is required to inform decision-making. This should include analysis of the mid-term stage of the plan, before the A3 improvement is complete, as well as 2034.

## **Doct Ref T13 Transport Strategy**

Section 1 Overview. The description of existing conditions and challenges is broadly correct and welcome.

Section 2 Surface access to airports. The problem is that **the improved A3 will be at or over capacity in peak periods under the Plan, and the M25 SW Quadrant study has concluded that the M25 will be overloaded. So surface access to Heathrow from Guildford will continue to be affected** by the weaknesses listed in this section.

Section 3 Rail. This section is welcome. However, it is noted that Crossrail 2 has not yet been secured. We had previously commented information on the demand for and capacity of rail services is needed and that the main line to London is already extremely busy in peak periods.

Section 4 Strategic roads. Surely the strategy should be aligned with the position of Highways England set out in the Topic Paper on Transport, where it is evident that **the improvement of the A3 will not be completed until 2026/27, or even 2027/28?** The removal of schemes SRN1 and SRN6 from the list of key infrastructure for the plan, and redesignating them as ‘aspirational’, is inconsistent with the safety objectives of the borough and surely of Highways England and Surrey County Council as the highway authority. Under the strategy and the Plan, the **issues for Beechcroft Drive and the weaving and merging issues on the existing A3 will not be**

**addressed until half way through** the plan period.

Section 5 Local roads. While welcoming the aspiration to transform the town centre, the traffic implications have not been dealt with in the strategy or the Plan. Section 1 correctly included the issue of “severance of the town and its constituent neighbourhoods resulting from a combination of the A3 trunk road, railway lines and the River Wey”. The case for a new crossing of the river and railway relieving pressure on the Farnham Road railway bridge should be taken very seriously and examined in depth. **There is a real risk that a significant reduction in capacity in the town centre, both the gyratory and Walnut Tree Close, and on routes carrying the SMC, will lead to road users transferring to minor roads around the town that are unsuited to carrying more traffic.**

The M25 SW Quadrant study report **recommends that alternative routes are developed to carry orbital traffic, and this could mean more use of the A31/A331 in Guildford. There are local roads where capacity is already an issue and planned growth will add to problems that are not mentioned in this strategy.** The scope of this element of the strategy is not wide enough.

The bus transit strategy is welcome. However, there is **insufficient information on the Sustainable Movement Corridor to gauge either what it might deliver and its potential impact on road capacity.** The statement under ‘Anticipated improvements’ that the *New Sustainable Movement Corridor provides rapid and reliable bus journeys in Guildford urban area and links....’* **has not been demonstrated.** Consultants have been carrying out studies but the results have not been made public in time to inform this consultation.

**A high quality bus station in the town centre is critical for the future of the town.**

**There is a lack of park and ride on the east of the town** and not even an aspiration for future provision.

The active modes strategy is welcome. However, **many roads in the borough are two-lane carriageways of restricted width, with little scope for allocating space for cyclists,** and this has to be either accepted or addressed over the long term.

Section 6 Air quality. **If traffic is going to increase in aggregate, as the forecasts show, even with the measures being proposed, then air quality**

**will continue to be a concern.**

Section 7 Road safety. The proposals are welcome, but as stated above, the **schemes SRN1 and SRN6 should be reinstated in the Plan for safety reasons.**

Section 8 Programme and funding. See comments on Topic Paper: Transport and the Infrastructure Schedule (App C).

## **Topic Paper: Transport**

This is a helpful paper providing context and background to the transport aspects of the Plan.

The fact the new supplementary technical work is planned to be carried out prior to the submission of the plan to the Secretary of State (para 3.18) is welcome, but it would have been better if the results had been available for this consultation.

It is recommended that the wider evidence base should be expanded to include the following:

- Local Enterprise Partnerships and Local authorities: Influencing Strategic Transport in the South East, WSP, 2016
- Surrey County Council: Response to Waverley borough Council on WA/15/2395 Dunsfold Park, Dec 2016
- Guildford Borough Council: Guildford Town Centre Highway assessment –Town Centre Highway Layout Concept Testing, WSP, April 2016

## **Air Quality Assessment**

We welcome this new evidence, especially given revised estimates of premature deaths and health impact, issues with vehicle emission controls and misplaced optimism regarding congestion reduction in 2011.

The air quality effects of anticipated increased congestion on roads around the town centre should be carefully modelled and monitored. The cumulative effects of more development, rerouting buses, traffic displacement including pedestrianisation and interceptor car park expansion

should all be considered. For example, York Road continues to be a sensitive site having experienced NO<sub>2</sub> exceedances over several years. It has vulnerable school children in the vicinity and is expected to cope with much diverted traffic even though it is already beyond capacity and congested at peak times.

The air quality impact of increased traffic from Dunsfold coming into the gyratory should be monitored.

Traffic noise from the A3 should also be reported.

### **Retail and Leisure Study addendum (2017)**

The update is welcome but still appears to lag behind the pace of change in retail space demand. In an era when people will seek a mix of technology alongside retail venues that offer an agreeable “leisure experience”, the characterful shops that make use of old buildings can become an increasing draw, an asset that cannot be replicated in many places nationally. For leisure more generally, insufficient attention is paid to environmental character and quality as part of the attraction of Guildford.

In order to inform priorities, evidence should consider the relative merits of adding further retail space, that risks relegating the High Street to a secondary zone, versus using more of sites such as North Street for high tech incubator businesses linked to 5G and for housing. Would confining new shops to the North Street frontage and providing for these other uses (and a bus interchange) behind be more appropriate. If a new department store is added, is an existing one likely to fail?

### **Land Availability Assessment (LAA) (2016) and addendum (2017)**

Green Belt protection, landscape impact, flood risk and transport constraints should be applied to establish more appropriate sites and housing figures. Sites that need safeguarding for future infrastructure requirements such as a tunnel also need adding.

### **Monitoring Report 2015/16 (2015)**

### **Open Space, Sports and Recreation Assessment 2016**

**Rural Economic Strategy 2017  
Strategic Flood Risk Assessment SFRA (2016) – Level 1 and Level 2  
Sustainability Appraisal Scoping Report (2013) and Sustainability  
Appraisal (2017)**

We do not consider the range of options assessed in the Appraisal to be appropriate.

The report identifies significant effects.

**West Surrey Functional Economic Market Area (FEMA)  
Guildford Town Centre Regeneration Strategy 2017**

**Question 3: Soundness**

It is unsound and unsustainable to develop on the scale proposed.

There is evidence Guildford's population growth is overestimated by about 40% because of under-recording of students leaving at the end of their studies.

Even taking account of all the proposals in the 2017 Plan, including skewing of development to later in the plan period and linking development to infrastructure, congestion which is already severe is set to get worse over the plan period.

In view of flawed new housing evidence and the implications of emerging transport evidence, Guildford's proposal for more than 12,426 homes (plus a buffer of 1,155 homes) is excessive and will result in needless loss of Green Belt and green character, sprawl along the A3 and increased congestion, that cannot be justified in our heavily constrained borough.

If the Council fails to apply Green Belt protection or constrain expansion to reflect widespread, legitimate environmental and transport constraints, the 2017 Plan will cause harm to the qualities that underpin the economic success of Guildford and aggravate congestion.

The overall housing target and increase in retail space should be reduced to take account of the constraints of our gap town, growth in online retailing and potential for sustainable commuting.

Opportunities to provide greater accommodation on campus for university students and to open up access across the railway for our physically divided town have not been pursued sufficiently positively.

The revised proposal that only 60% of full time Guildford based University students will be provided with accommodation on campus puts unnecessary pressure on housing stock in the town. An 80% target could help by freeing up affordable homes relatively quickly.

Allocating too much land for development in the 2017 Plan will also result in Guildford being required to assess whether it can provide homes for Woking on our Green Belt. This is folly given the constraints in Guildford, a gap town with constricted roads set in the Surrey Hills AONB.

### **Green Belt and Sustainability**

We do not accept the Council's case for exceptional circumstances.

- The NMSS SHMA review indicates that the evidence base exaggerates the level of housing need and that the employment housing need assessment is flawed. Increasing housing supply beyond the level suggested by the demographic OAN would not have a discernible effect on affordability but simply mean more people who can afford high prices moving to the area.
- We submit that the economic need should be tested on a sector by sector basis and that the priority given to retail expansion should be questioned.
- Suitable deliverable alternatives, such as significantly increasing campus accommodation, thereby freeing up homes in the town, and provision of more homes on North Street in lieu of a large increase in retail, should be pursued.
- Options for meeting revised need in larger settlements beyond the outer Green Belt boundary linked to sustainable transport have not been fully explored.
- The option of not fully meeting needs in recognition of constraints, including Green Belt, has not been balanced against the positive and negative consequences of fully meeting need (as revised) as should

happen in a meaningful Sustainability Appraisal that takes account of environmental capacity.

- Commuting by sustainable means, especially in the context of the current high levels of inward- and outward-commuting, should not be dismissed as an unsustainable option in all the circumstances.
- It would be irresponsible and unsustainable to use up all potential least-worst, last resort Green Belt sites within one plan period.
- High-added-value, knowledge-based businesses and homes should be given priority over expansion in retail land.

## **Constraints**

Guildford is physically constrained being a gap town set in the Surrey Hills AONB and in Metropolitan Green Belt. Significant parts are affected by the Thames Basin Heath Special Protection Area. There are also notable areas of river, surface water, groundwater and sewer flood risk. Constricted road and rail routes converge to cross the downs seeking to avoid both high ground and floodplain. These compete with housing for land and there is no space for road widening or a conventional ring road approach. High rise buildings would be inappropriate due to the important contribution views and the rise and fall of the land make to both urban and rural character, including the nationally significant Surrey Hills AONB. The river and railway divide the town and there are too few crossing points; a further constraint. Air quality and traffic noise are not insignificant considerations in some locations.

The Local Plan process envisages that the housing target should be lower than the “objectively assessed need” if there are valid constraints. GRA considers it would be harmful to rural, suburban and urban character, quality of life and the economy of Guildford not to reduce the new housing units delivered by 2034 to a number significantly below 12,426. We submit it would be counter to sustainable development as a whole (in particular to living within environmental limits and achieving a sustainable economy) and contrary to policy to develop on the scale currently proposed. We are concerned that insufficient attention has been paid to cumulative impacts with constraints considered separately for each site.

Transport infrastructure remains a constraint. Current congestion is severe by any meaningful definition and there is a back log of infrastructure investment. Assessment of the transport evidence by expert, Richard Jarvis,

using the information made available to date, indicates that the overall effect of completing the proposed schemes and development in the Plan would be congestion to a level that makes it hard to conclude that the test in paragraph 32 of the NPPF is passed. Any notion that building over 12,426 homes is going to deliver infrastructure that will overcome Guildford's traffic problems seems misguided. He writes:

“In terms of its transport aspects, the Plan cannot be regarded as sound. GBC has provided vivid descriptions of the conditions on the network today and the evidence is that these will be as poor, and in some cases worse, at the end of the plan period, even with the mitigation measures. Growth and infrastructure have to be better aligned. While the level of growth in homes in this latest draft plan is somewhat lower than that in the 2016 version, it is still substantial and growth is also planned outside the borough. The evidence provided indicates that congestion will be widespread on much of the highway network in peak periods, even with the proposed highway schemes and with the measures to encourage the use of public transport in place.”

In view of the extent of physical constraints, protective designations and congestion, it is possible that even a more accurate, lower OAN housing figure, once it has been identified, would need to be constrained.

We submit that Guildford BC should:

- revise the SHMA to make corrections and to better account for student need
- undertake a proper assessment of constraints, informed by a strategic Green Belt review and a Sustainability Appraisal that tests environmental capacity and considers meaningful alternatives to establish an appropriate balance between adverse effects and fully meeting (revised) need
- continue to improve the transport evidence which points to congestion and work up transport proposals such that both can better inform the plan.

Any housing figure adopted in the context of considerable uncertainty would need to be kept under regular review.

If any land releases were deemed necessary following a rigorous, strategic and accountable approach to Green Belt review, these should be measured

and paced, arising from a robust assessment of the balance between benefits and adverse effects, taking full account of environmental capacity.

Guildford has not currently provided the evidence to derive a housing figure arising from such a process. It is notable that Woking applies constraints to its OAN.

More strategic solutions, such as development beyond the Green Belt linked to sustainable commuting or a tunnel for the A3, are required now. Such alternative strategies cannot be left until the next Plan period. Indeed, it is troubling that the proposal for an A3 tunnel has been dropped as an aspiration. This should be being planned now and any necessary land at Gosden Hill and Compton safeguarded.

### **Neglected Opportunities**

A more sound and sustainable approach to planning positively in Guildford should include greater emphasis on the following:

- **Campus accommodation:**  
**Higher priority should be given to providing attractive campus accommodation so a very high proportion of university students will want to live on campus thereby freeing up affordable homes in the town.** Significantly, this could deliver homes within the challenging first five year period of the Plan. We need to plan positively to find sustainable ways to sustain a thriving university in a constrained, commuter belt gap town. Just as if you provide attractive cycle facilities they are used, if you provide attractive student accommodation, it is used.
  
- **Sustainable commuting:**  
**The revised plan evidence describes commuting as “unsustainable”. This need not be the case. Far more attention should be given to the potential for enabling sustainable commuting recognising that Guildford has a high-value-added economy in a constrained gap town location.** Rather than destroying the qualities that underpin the town’s economic success by overdeveloping, the scope for making it easy and affordable to commute by sustainable means from less constrained settlements should be pursued as a priority, both for the short and long term.

The context is that levels of both inward and outward commuting are extremely high. Almost half the working population commutes out to work and almost half of the workforce commutes in. In many households, occupants work in different locations and people do not necessarily move when they change jobs. In 2001, more people commuted out to Rushmoor than vice versa and more commuted in from Waverley than vice versa.

In a Guildford context, the aspiration that more people should live where they work needs to be balanced with other sustainability considerations.

- **All-direction, central bus interchange:**  
**The current site has been declared available for development in an agreement with a developer without an appropriate alternative location being identified in the revised Plan. Failure to identify a central location, and to allocate appropriate land, for an attractive all-direction bus interchange in the town is a grave failing that undermines the soundness of the Plan and should be addressed as a matter of urgency.** A central interchange is needed in view of levels of congestion, the gradients involved in town centre journeys, the limited options for crossing the railway and river, and the need to provide sustainable transport options to support complex commuting and travel patterns.

- **Town centre plan:**  
**Better progress, and a more joined up approach, in town centre planning is required.** The slow pace has meant opportunities for coordinated brownfield development are not available as part of this Plan. The need to have brought forward town centre options in a timely way should have been foreseen. Guildford had already used up its green field sites within its Green Belt boundary by the time of the 2003 Local Plan.

GBC's decision to tackle the town centre **after** the Plan is preventing joined up planning. The implications of an approach of constraining cross Guildford movement has major implications that need to be understood.

- **New cross- town road bridge:**  
**An additional bridge over the river and railway is required to improve connections across the railways and river for our physically divided**

**town.** We want to see the townscape improved, with better use of the river. Achieving this, while maintaining accessibility, will be much easier with a new crossing.

## **Sustainable Choices**

Given the scarcity of land arising from being a constrained gap town, the Plan should consider a wider range of sustainable strategies than simply expanding across the board.

- **Balance between retail expansion and town centre homes**

The Plan should weigh the case for a major increase in retail space, especially given trends in internet shopping, with the opportunity to provide accessible and sustainable town centre homes. Increased town centre housing provision for the elderly could also have the beneficial knock-on effect of freeing up existing family homes. All types of town centre housing would help support the evening economy.

The wisdom of such massive retail expansion, on top of already generous retail provision, needs to be challenged in view of the fate of the high street in many places. The mix of homes and retail, with its relatively low added-value, in the North Street development should be reconsidered.

- **Balance between high-value-added, knowledge-based economy and retail expansion**

Similarly, the mix between land allocated to the high-value-added, knowledge-based economy in the town and to retail expansion should be carefully reviewed. Knowledge-based enterprises yield returns between 3 and 4 times greater than retail.

## **Planning ahead**

In order to deliver sustainable development, it is important to plan ahead. Sites for entrances and, in the shorter term construction areas, for an A3 tunnel through Guildford should be safeguarded. Land should also be allocated for more immediate projects such as an additional crossing over the railway for local journeys.

## Question 4: Duty to cooperate

We sustain our previous comment about the need to cooperate with settlements beyond the Green Belt and outside the supposed HMA.

We are concerned the impact of development at Dunsfold needs to be better planned and managed.

Please refer to our comments on unmet need from Woking under evidence and soundness. Cooperation is only meaningful if all parties apply policy on a common basis and GBC is failing to apply constraints appropriately to prevent sprawl and congestion.

## Question 5: The content of the plan

Key facts about the borough

The changes to paras 2.13, 2.14a, 2.14b and 2.15 are welcome. In para 2.15, the text now says that there are opportunities to improve the *capacity* of the road network, rather than *performance*. This is more realistic and fits with the plans. However it does not match the ambition of the Transport Strategy to 'address the historic infrastructure deficit'.

Reference to the extent of commuting, a notable feature of the borough, should be reinstated alongside the infrastructure references.

## Our vision and ambition

Strategic Objectives

Concerns upheld

Spatial Vision

In line with our evidence and soundness comments, we do not support the revised figures for housing.

In line with our evidence and soundness comments and our previous response, we do not support the revised retail figures.

The last paragraph in the Spatial Vision statement refers to '*early targeted improvement schemes to deliver road safety and some congestion relief on the A3 will be delivered within the plan period*'. While it is correct that funding

has been committed for two improvement schemes – SRN7 (£1.6m) and SRN8 (£2.5m), but the two safety related schemes SRN1 and SRN6, previously regarded as urgent, have been removed from the infrastructure schedule. The final sentence of the Spatial Vision should be changed to read as follows: *The rate of delivery of housing in the plan period is conditional on major improvement of the A3 through Guildford and the other highway improvement schemes listed in the Infrastructure Schedule.*

## **Policies**

### **Policy S1: Presumption in favour of sustainable development**

We welcome the additions to 4.1.1 and 4.1.4

4.1.2a The three pronged approach is how the objective of sustainable development is achieved not a definition. It is important to use the definition as agreed for the NPPF relating to meeting needs without compromising future generations and the five guiding principles. You could also refer to the Government’s commitment for this generation to leave the environment better than it inherited it.

### **Policy S2: Planning for the borough - our spatial development strategy**

In line with our evidence and soundness comments, we do not support the revised figures for housing.

In line with our evidence and soundness comments and our previous response, we do not support the revised retail figures.

We welcome the realism that some sites will not be able to deliver until later in the plan period and the link to infrastructure. However, we do not accept that many of the sites in the SHLAA are appropriate for development.

Constraints have not been applied arising from an assessment weighing meeting needs versus harm. Need is exaggerated.

It is inappropriate to propose a large development buffer given the

constraints.

### *Monitoring Indicators*

There is no indicator to track the location of development and the objective that overall brownfield land will be developed first.

## **Policy H1: Homes for all**

Net Loss - We oppose the proposed changes to H1 (2) as too inflexible. Exceptional circumstances will arise.

Density - We oppose the deletion of the section on density although we considered the last sentence on the town centre to be superfluous. We consider this section worked well as part of a policy that also looks at the range of types of home needed. The approach of an overall presumption in favour of efficient use of land and decisions taken on what is appropriate on a case by case basis has been very helpful locally in enabling positive schemes in Guildford. Previous targets were too blunt to be useful having no relevance where higher densities could be achieved and driving harmful schemes and avoidable appeals in those instances where a lower density was appropriate.

Student Accommodation – We oppose the proposal that only 60% of “full time Guildford based” students should be on campus rather than of all students. In practice, this means far fewer than 60% which is already far too low given the challenges of identifying acceptable sites in Guildford. Change in this policy to at least 80% on campus would make a significant difference to affordable housing availability for others in the town and could transform Guildford’s ability to meet its housing need in the first five years.

Paragraph 4.2.3 This break down cannot be ‘known from the SHMA’ given the demographic and economic need errors.

Paragraph 4.2.8 We oppose deletion of this text which enables developers to appreciate the links between housing type and density when identifying an appropriate mix for a site. It supplements the NPPF well.

## **Policy P1: Surrey Hills Area of Outstanding Natural Beauty (AONB)**

We welcome inclusion of AGLV and the clarification of this policy apart from

two issues:

- the addition “as designated on the Policies Map”. Natural England is the designating body not GBC and it has emerged that there are errors in the boundary used by GBC in the 2003 Local Plan. We propose deletion of this reference or reference to the statutory map.
- the need to add “and views” at the end of P1 (2).

Paragraph 4.3.10 could usefully refer to the importance attached to:

- conserve wildlife, historic objects or natural phenomena within it
- promote its enjoyment by the community and visitors to the area
- support the rural economy of the Surrey Hills area
- provide or maintain public access to the AONB.

These are enduring features, if not statutory purposes, that will survive any update of the Management Plan. Development will benefit from this steer.

We sustain our objection to the Monitoring Indicator which could encourage the perverse behaviour of avoiding appeals.

## **Policy P2: Green Belt**

See comments on evidence.

## **Policy P4: Flooding, flood risk and groundwater source protection zones**

We welcome addition of the new climate change allowance.

We ask for policy on developed Zone 3b floodplain to, where possible, encourage the layout of development within a site to be changed to reduce the footprint within the functional flood zone and to make more space for water. Currently, the policy reinforces existing layout (albeit with reference to an assessment).

## **Policy P5: Thames Basin Heaths Special Protection Area**

In 4.3.50c, it should be clear that mitigation requires a new opportunity for recreation in natural greenspace or an improvement to the natural qualities available to be enjoyed in an existing green space. It is not acceptable to repackage, overly manicure or introduce intrusive recreational features in an area of natural beauty already enjoyed by the public.

## **Policy E2: Location for new employment floorspace**

4.4.15 We sustain our objection to directing development to locations within 500m of a public transport interchange while the list includes stations in residential, school and rural areas (eg London Road, Merrow (ref 4.4.16), West Horsley) unless there is clear guidance on the need to respect character and consider other impacts. We suggest these stations are moved to an expanded version of 4.4.17

## **POLICY E6: The leisure and visitor experience**

Welcome stronger link to environmental character.

## **Policy E7: Retail and Service Centres**

Even with the revisions, we question the wisdom of expanding retail floor space on this scale given the demand from competing priorities in our constrained town and given the need to ensure resilience for the High Street in the face of trends in retailing.

The retail allocation for North Street has not been reduced sufficiently to accommodate the desirable increase in housing. Six storeys along North Street, as required to achieve the proposed quantum of mixed use development, would have a harmful effect. The retail element should be reduced further, shops developed along North Street, a bus interchange retained and the potential for some flexible high tech business space considered.

Our previously stated concerns stand.

## **Policy D1: Place Shaping**

We oppose the proposed deletion of the last paragraph of D1. Getting design and character right in larger schemes will be as important for the economy of Guildford as broadband.

## **Policy D4: Character and design of new development**

The policy itself should include promoting “green approaches”, which should apply to arterial routes into and through settlements not just to the outer edges of settlements. This feature is part of local distinctiveness in the borough.

The proposed monitoring target does not work. It will have the perverse consequence of discouraging opposing insensitive development to avoid appeal. Suggest annual assessment of indicators by a borough design panel.

If there is a desire to avoid duplication and bring all design, density and character policy into one place, it is suggested the sequence is changed so D4 becomes D 2. This would assist a user of the Plan to follow the logic more clearly. The linkage between D4 (as currently labelled) and D1 should be made clearer. The expectation larger schemes will apply both policies should also be clearer.

### **Policy ID1: Infrastructure and delivery and Appendix C Infrastructure schedule**

The strengthening of conditionality in point (3) is supported.

However, it is not clear that the infrastructure proposed would be adequate.

#### **Appendix C Infrastructure schedule**

SRN1 and SRN 6 should be reinstated.

The addition of LRN 23, LRN24 and LRN25 is supported.

The funding sources for many of the Local Road Schemes have been changed to ‘Developer’ only. The highway authority, SCC, is not proposing any schemes of its own. Is this due to lack of funds, or a belief that nothing more is needed?

The addition of BT5 and BT6 is supported

### **Policy ID2: Supporting the Department for Transport's "Road Investment Strategy"**

4.6.18 We are troubled reference to an A3 tunnel beyond the Plan period has been deleted and that land is not safeguarded for entrances or works areas.

### **Policy ID3: Sustainable transport for new developments**

The change from ‘will expect’ to ‘will be required’ in point (2) is supported. The similar revised wording in point (7) is also supported.

The lack of specificity about the Sustainable Movement Corridor makes it difficult to make an informed comment on point (3).

It is very likely that the claims made for the SMC exceed what can be delivered, and the plan should be based on realistic forecasts and a sound business case.

Para 4.6.24 states the aim and means of implementing the SMC. The provision of the corridor should be ‘subject to a sound business case’.

We oppose the very open-ended new policy on new public car parks without assurances on design and character or clarity on whether this relates to expansion of existing or conversion from another use. Interceptor car parks could be close to residential areas or landscape features and not all sites will be suitable. They could require careful siting and design.

### **Policy ID4: Green and blue infrastructure**

The introductory text has improved a little but the policy itself remains inadequate and lacks the joined up thinking required. The policy launches straight into “biodiversity” obligations.

We welcome the proposed SPD to set out opportunities and shape delivery of integrated multifunctional Blue Green Infrastructure.

We propose that “slow the flow” and sustainable drainage schemes, intended to reduce flood risk, should be considered as contributing to blue green infrastructure due to their wider benefits.

The addition of 4.6.49a is out of place here. It puts inappropriate focus on a specific proposal. It is already covered by national policy so an application can be considered with reference to this. Planners are well placed to balance and weigh different policy objectives when considering any application where the public interest requires a trade-off. Once you start referring to specific proposals in plan policies, where do you draw the line? Legitimate transport or health or flood risk management needs?

## Sites

### **A1: The Plaza, Portsmouth Road**

Concern about heights and overdevelopment

### **A2: Guildford Cinema, Bedford Road**

### **A3: Land between Farnham Road and the Mount**

### **~~A4: Telephone Exchange, Leapale Road~~**

### **A5: Jewsons, Walnut Tree Close**

### **A6: North Street redevelopment**

Question mix of housing and retail

Remain concerned at extent of proposed expansion of retail floor space

Delete minimum retail requirement. Could be residential and high tech hub.

Research shows millennials buy online and want a retail experience that requires less retail and stock floor space.

Welcome caveat re bulk but strong concern about bulk and massing and loss of bus interchange with no appropriate facility or alternative location being identified.

Sustain objection – loss of bus interchange

Need to allocate land for an attractive all-direction bus interchange

### **A7 Land at Guildford railway station**

Oppose Wey corridor and conservation area deletions. Should retain a requirement to avoid inappropriate development in flood zone 2 in line with the sequential test, and should strengthen requirement to manage surface water risk which is high and significant for development linked to a transport hub.

Important to avoid overdevelopment and limit the height of development

### **A8: Land west of Guildford railway station**

### **A9: 77 to 83 Walnut Tree Close**

### **A10: Sustainable Movement Corridor, off Walnut Tree Close**

See comments under Questions 1 to 3 and transport policies

### **A11: Guildford Park Car Park**

Welcome. Important to avoid overdevelopment and limit the height of development

### **A12: Bright Hill Car Park, Sydenham Road**

### **A13: Kernal Court, Walnut Tree Close**

### **A14: Wey Corner, Walnut Tree Close**

### **A15: Land at Guildford Cathedral**

**A16: Land between Gill Avenue and Rosalind Franklin Close**

**A17: Land south of Royal Surrey County Hospital**

**A18: Land at Guildford College**

**A19: Land at Westway, off Aldershot Road**

**A20: Former Pond Meadow School**

**A21: Land at Westborough allotments**

Welcome

**A22: Land north of Keens Lane**

**A23: Land north of Salt Box Road**

**A24: Slyfield Area Regeneration Project**

Welcome. Important to avoid overdevelopment and limit the height of development

Policy on green approaches needs strengthening

**A25: Gosden Hill Farm**

See comments on questions 1 to 3

Policy on green approaches needs strengthening

Land for A3 tunnel entrance and works areas needs safeguarding

**A26: Blackwell Farm**

See comments on questions 1 to 3

Oppose road development in the AONB

Policy on green approaches needs strengthening

**A59 New rail station at Guildford West (Park Barn)**

**A27: Warren Farm, White Lane, Ash Green**

**A28: Land to the east of White Lane, Ash Green**

**A29: Land to the south and east of Ash and Tongham**

~~**A30: Land for new bridge A323 at Ash railway station**~~

**A31: Land north east of Spoil Lane, Tongham**

**A32: Surrey Police Headquarters, Mount Browne**

Object to erosion of AONB or removal from Green Belt

**A33: The University of Law**

Object to erosion of AONB or removal from Green Belt

~~**A34: Broadford Business Park, Shalford**~~

**A35: Land at former Wisley airfield**

See comments on questions 1 to 3

Policy on green approaches needs strengthening

~~**A36: Hotel, Guildford Road, East Horsley**~~

**A37: Land at Bell and Colvill, West Horsley**

- A38: Land to the west of West Horsley**
- A39: Land near Horsley railway station, East Horsley**
- A40: Land to the north of West Horsley**
- ~~**A41: Land to the south of West Horsley**~~
- A42: Clockbarn Nursery, Tannery Lane**
- A43: Land at Garlick's Arch, Send Marsh/ Burnt Common**
- See comments on questions 1 to 3
- Policy on green approaches needs strengthening
- A43a: Land for new north facing slip roads to/from A3**
- A44: Land west of Winds Ridge and Send Hill**
- A45: Land at the rear of the Talbot, Ripley**
- ~~**A46: Land to the south of Normandy and north of Flexford**~~
- ~~**A47: Land to east of The Paddocks, Flexford**~~
- A58 Land around Burnt Common warehouse, London Road, Send**
- ~~**A48: Land at Home Farm, Effingham**~~
- A49: Palm House Nurseries, Normandy**
- A50: Land at Whittles Drive, Aldershot Road**
- A51: Land at Cobbetts Close, Worplesdon**
- A52: Four Acre Stables, Aldershot Road**
- A53: Roundoak, Wood Street Village**
- A54: Lakeview, Lakeside Road, Ash Vale**
- A55: The Orchard, Puttenham Heath Road**
- A56: Valley Park Equestrian, East Shalford Lane**
- A57: The Paddocks, Rose Lane, Ripley**

## **Appendix 1: Housing Need**

Please refer to separately attached report by Neil McDonald of NMSS