

Time to Speak Out!

GRA asks for one last push to get the housing need figure for Guildford right.

Whether you've already commented or not yet had a chance,
NOW is the time to make your comments on the Draft Local Plan really count.
What you say will go to the Inspector.

The opportunity:

Just in time for the final stage of consultation on the Guildford Plan, new lower population and household figures have been produced by the Office for National Statistics. These correct flaws which inflated Guildford's housing figures by overestimating how many students stay and have children after their course finishes.

We need your help to **ask the Inspector to re-open the examination and amend the Plan to take account of the new lower figures.**

GRA's adviser, a leading national expert, has shown **Guildford can achieve ambitious economic growth with an extra 360 homes a year.** This is still a big number, recognising we need homes, but is much **more realistic than the 672 extra homes a year currently proposed in the Draft Plan which would lead to excessive loss of countryside, congestion and town cramming.**

The new figure of 360 homes means **development in the Green Belt on the scale proposed in the Plan can no longer be justified.** The new lower figure would also make it **more achievable to bring forward well-planned, sensitively-designed housing in the town centre** in a timely way.

You have an opportunity to **say which site/s you think should come out of the Plan** and not be developed:

- Perhaps one of the big Green Belt sites*:
 - **Blackwell Farm** which adjoins the Surrey Hills AONB, or
 - **Gosden Hill** which provides highly visible Green Belt along the A3 from London, or
 - **Wisley** which does not abut Guildford?
- Perhaps several of the smaller sites* such as Aaron's Hill, Chilworth, Flexford, Garlick's Arch, Keens Lane or Send?

** Not in merit order*

Last chance to change Local Plan

By email: localplan@guildford.gov.uk by 23/10

Online: <https://getinvolved.guildford.gov.uk/consult.ti/LPMM18/consultationHome>

By post: Planning Policy, Guildford Borough Council, Millmead, Guildford GU2 4BB

Give name and address

Deadline for responses: Noon 23 October 2018

The problem:

Guildford Borough Council is persisting in calling for a high housing figure.

The current figure in the Draft Plan, of 630+42 extra homes a year, is 75% higher than the number of homes needed to support ambitious economic growth and out of step with both the new ONS figure and the new Government formula. It is based on:

- adding extra homes for students even though they are already well catered for in the figures
- inflating the figures by being very pessimistic about how many and how much local people work, so lots of extra workers would have to be brought in.

We would be building two times more homes than the local population needs in the hope over-supply will drive down house prices.

GBC is saying it wants the extra homes to justify new infrastructure. This overlooks the fact **developers only contribute to new infrastructure to the extent they make problems worse**. Developers do not tackle the backlog of infrastructure investment or existing congestion. In any case, early development in our Plan currently offers little in the way of infrastructure.

To make matters worse, **the Inspector is also suggesting we build an additional 42 homes a year in Guildford's Green Belt to protect Woking's Green Belt**. This takes our proposed housing figure from 630 to 672. It seems perverse when Woking has ambitious growth plans. Its housing need figure has also reduced and has not been assessed at Examination.

Make a difference

Priority ideas for your response:

Give your name, address and say to which amendment your comment relates (eg MM2).

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government's standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking's need figure has also reduced and has not been examined,

Additional ideas for a more detailed response:

MM2 Although extra sites are required because some might not come to fruition, the **housing supply** figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

MM3 In (5) new town centre development should avoid adverse **impact on surrounding residential** areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to **prevent inappropriate garden grabbing** and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

MM9 In Green Belt, proposed limited **infilling outside identified settlement** boundaries should not be allowed, would harm openness and become a loophole.

MM23 In (9) strategic sites should not be exempt from a requirement to reflect **locally distinct** patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address **character** adequately.

MM23 Promotion of “**green approaches**” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the **Wey Corridor** then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A **height limit** should be introduced given the importance of the rise and fall of the downs in the urban landscape.

MM31 on **North Street** should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for **North Street** is required.

MM31 Where is the allocation for an **all-direction bus interchange**?

MM32 A height limit for **White Lion Walk** is required.

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at **Slyfield** and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

MM35 *Should **Gosden Hill** be retained as highly effective Green Belt along the A3 and removed from the Plan? Revised housing need figures weaken the justification for development.*

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at **Gosden Hill** to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable

MM36 *Should **Blackwell Farm** be retained as Green Belt, which also protects views from the AONB along the Hogs Back, and removed from the Plan? Revised housing need figures weaken the justification for development.*

MM37 The proposed land for an access road between the A31 and **Blackwell Farm** would harm the AONB.

MM39 *Can adding a new Green Belt site at **Aaron's Hill** be justified given revised figures?*

MM40 *Should **Wisley** be retained as Green Belt and removed from the Plan? Revised housing need figures weaken the justification for development. It does not adjoin Guildford.*

MM41 *Should **Garlick's Arch** be retained as Green Belt in view of revised housing need, rather than expanded?*

MM43 *Can adding a new Green Belt site at **Chilworth** be justified in view of revised figures?*

MM44 *Can adding a new Green Belt site at **Send** be justified in view of revised figures?*

MM45 *Can adding a new Green Belt site at **Flexford** be justified in view of revised figures?*



Produced by Guildford Residents Association

Comprising about 30 Residents Associations and Parish Councils

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