

Guildford Local Plan Scoping Consultation Questionnaire

Spatial strategy

Question 1

Do you agree with our approach to developing a Local Plan spatial strategy (see section 3.3 and section 3.4)?

Please tell us if anything should be changed, and if there are there any other factors beyond those identified in sections 3.3 and 3.4 that you think we should be considering in developing our Local Plan spatial strategy.

Spatial Strategy: Comments on application of national policy

We wish to put on record our concern about the national system that this Plan is required to follow.

Unreasonable to include penalties for not meeting a target that did not exist when our current Plan was approved:

Given that our Council has worked hard and positively to deliver the previously approved number of homes per year, the way changes in housing targets have been introduced seems negative and damaging. If a further step change in housing delivery is needed, this should be through a well-planned approach, not through encouraging speculative development in inappropriate locations and without essential infrastructure. It is no surprise Guildford does not have a 5 year supply to satisfy the new housing figure. The goal post was moved after the last Plan was agreed! Guildford should be given the opportunity to plan for the challenging new target and not have to deal with a flurry of opportunistic, unplanned proposals.

Affordability uplift is harmful and distorting:

We also draw attention to the flawed logic in the way the new housing target is derived using the 'standard method'. Applying a large uplift to the housing figure because of affordability (based on ratio of housing cost relative to local earnings) will not reduce prices as proposed. Developers will only proceed with delivery at a rate that preserves prices and often market their developments to overseas clients.

Overly high targets will result in overdevelopment harming desirable places that contribute significantly to the economy. Any housing uplift should be based on capacity and opportunity. This would be consistent with sustainable development.

These comments are offered positively not from a place of resistance to change. If you want the community to work with you, the process should be credible and positive, not punitive and damaging.

Spatial Strategy: Local comments

The new 'standard method' housing figure is extremely high and challenging. It will be consistent with both the requirement to be 'positive' and the requirement for joint working on cross-boundary strategic matters, to **capture constraints, as well as opportunities, in the iterative process of developing the spatial strategy.**

It will be important for the spatial strategy to **set out how you will approach joint working across the authorities of West Surrey going forward.** The approach needs to be **fair and based on capacity, opportunity and constraints.**

Infrastructure Delivery:

3.4.12 refers to looking at the capacity of existing LPSS site allocations, that have yet to gain planning permission, to ensure density is optimised. As part of this process, it will be essential to take account of whether essential infrastructure will be delivered. Otherwise increasing the number of units will just add to grave infrastructure deficits and to congestion. For example:

- Various strategic sites in the LPSS were contingent on infrastructure such as A3 improvements, slip roads and/or stations that are no longer expected to be delivered.
- The “back up” infrastructure that the LPSS inspector was assured would be delivered, such as the sustainable movement corridor, is not being delivered either.
- Partial development of sites, without the provision of infrastructure has also been an issue that needs acknowledging and managing.

We agree with 3.4.13 that the primary objective should be to create a **sustainable pattern of development**. **This should include all aspects of sustainability, not just connectivity and services.**

Role of Green Belt in the Spatial Strategy

We have major concerns with the Green Belt Study and do not agree with reliance being placed on this, in its current form, to inform the spatial strategy. We disagree with the assessment of various parcels and have fundamental concerns with the way the guidance has been applied. The current over identification of Grey Belt diminishes the value of the Study in informing decisions in the Plan allocation process.

a) Metropolitan Green Belt:

The approach has been applied in a way that fails to take account of the significance of the relevant Green Belt being **Metropolitan** Green Belt. The planning intention is that the **metropolis does not sprawl**, be that along the M1 to the north or along the A3 to the south-west, and that there is **separation between the capital and surrounding settlements**. The Green Belt Study assessment is purely locally focused and insufficiently strategic. The NPPF specifies checking unrestricted sprawl of large built-up areas and preventing neighbouring towns merging. Scale matters and a more strategic dimension is required.

b) Preventing towns merging:

The Green Belt Study's approach to the second Green Belt purpose, preventing towns merging, is of particular concern and we suggest flawed:

- There is no sense to the apparent conclusion that only one assessment area contributes strongly to preventing Guildford and Godalming from merging.
- The assessment is suggesting that no land in Guildford Borough between Guildford and Woking contributes strongly to preventing these two towns from merging. We find this nonsensical and far from what the NPPF intends.
- The way the distinction between strong and moderate is applied needs reconsidering against the NPPF criteria. We question the assumption that there needs to be intervisibility between two towns for an assessment parcel to serve a strong Green Belt function.

We submit that significantly more land contributes *strongly* to preventing towns merging when judged on the basis set out in the NPPF, namely:

- Likely to be free of development

- Forms a substantial part of a gap between towns and, if developed, would be likely to result in loss of visual separation of towns.

There are a number of places in Elmbridge that have merged or where a small open area is insufficient to achieve a sense of separation. The only way you know you are passing from one place to another is due to a sign. In Guildford Borough, Green Belt has served to provide separation between towns. This separation is perceived visually from roads, railway lines, public open space and key vantage points.

Proposing just one assessment area, between Godalming and Guildford, contributes strongly to separation, does not achieve the purpose of preventing Woking, Guildford and Godalming from merging. The **Study does not accurately identify areas that contribute strongly to separation of towns**. The topography of Guildford is relevant to how visual separation is perceived. The Study fails to appreciate woodland as an open Green Belt use. The way the criteria (eg scale, “likely to be free of development” and visual separation) have been interpreted needs reconsidering.

c) Checking sprawl:

The way the study has interpreted physical features that restrict and contain development is leading to bizarre conclusions. The NPPF refers to areas making a strong contribution to preventing sprawl being:

- likely to lack physical features that could restrict and contain development.

We suggest that, in many instances, transport features, such as roads and railways, should not automatically be treated as physical features that restrict and contain development. They are often flush with the landscape and features from which the openness of the Green Belt is experienced. A blanket assumption that every road near the edge of a large urban area could restrict and contain development could lead to development abutting roads at the edge of every larger settlement. Such a strong presumption that *land adjacent to a road could not make a strong contribution to the Green Belt purpose of preventing sprawl*, leads to most edge of town land being described as Grey Belt. This would undermine the overarching purpose of Green Belt. A more targeted case by case approach to roads and railways would enable more focus on physical features that **restrict and contain** development.

We also note the focus in the NPPF on identifying irregularities in the shape of major towns with a view to identifying opportunities for more enclosed, urban edge development. This is also associated with the presumption that extended fingers of development might not be desirable. This logic may be appropriate in a flat location, but it needs careful application in the context of Guildford as a gap town. Guildford sits in a gap in the downs and spreads onto the floodplain. There is a topographical logic to the town having more extended petal-shaped edges on the downland-facing sides, as it fits among the hills, and to it extending along the floodplain while avoiding river courses. To regularise the edges in some places would have a disproportionate, damaging impact, including on the effectiveness of the Green Belt purpose of avoiding sprawl. The Study should take account of this in an objective and rigorous way in applying the NPPF criteria. Topography is a missing dimension.

d) Historic setting:

We suggest that the Wey Navigation, a Conservation Area in its own right, is a crucial feature relevant to Guildford being a historic town. Views of historic features of Guildford across the water meadows of the historic navigation contribute significantly to the historic character of the town. The report appears inconsistent. For example, GU2 provides iconic views across meadow land of historic features of the town yet is described as making a weak contribution to Green Belt purposes. By contrast, in relation to GU37, the Wey navigation and meadows are seen as having a visual and experiential relationship to historic aspects of the town. Both are important.

e) Review:

In many places, the Green Belt Study reads like a desk exercise with insufficient sense of delivery of Green Belt purpose on the ground. It is a commendable early attempt to apply a new policy, but we suggest assumptions made and the way the criteria have been applied have resulted in some flawed conclusions.

The report needs a review before it is used to inform subsequent stages in the Plan preparation process. We are not resisting the principle of identifying Grey Belt. Our concern is that the approach used in interpreting the guidance has identified too much Grey Belt and undervalued strong Green Belt contribution. The NPPF includes terms such as “illustrative features”, “likely to be/include” and “but not limited to” recognising that some ground testing and a contextual dimension are required. The NPPF is drafted such that it would be highly appropriate to consider the effect of topography on the fulfilment of Green Belt purpose. In Guildford, visual separation, checking of sprawl and incongruous development patterns are often perceived from public viewpoints, in important views and along transport routes.

f) Next steps:

We are mindful that a crucial step is still missing in the Study. The NPPF states that Green Belt alterations should not be proposed “where there is clear evidence that these alterations would fundamentally undermine the purposes (taken together) of the remaining Green Belt when considered across the area of the plan”.

We note that the assessment relating to all Green Belt purposes is available for each individual assessment area in the appendices. We are troubled by some of the conclusions and the interpretation of preventing encroachment. What will the mechanism be for providing feedback on the initial assessment?

We are also mindful that footnote 7 will apply and that crucial landscape, nature conservation and flood risk considerations will be applied before any Green Belt changes are agreed.

We are, however, concerned that suggesting so many areas are potential “Grey Belt” in the study is not just inaccurate but also fundamentally undermines the purposes of the Green Belt. It invites speculative development and challenge to a degree that destroys the functioning of the Green Belt. Further, over assigning Grey Belt risks causing a form of blight by creating unrealistic expectations or encouraging land owners to assume that critical Green Belt can be developed.

There is no reason to over assign Grey Belt. A better reflection of Green Belt purpose in the Study would still leave open the possibility that the spatial strategy prioritises a Green Belt site in a sustainable location as a more sustainable option overall than a Grey Belt site.

Key issues and challenges and potential policies / policy topics

Homes and healthy communities

Question 2

Our top 3 issues

- unaffordability of new homes across all types and tenures
- mismatch between housing types and demographic need e.g. downsizing opportunities, housing for young people, need for assisted living
- poor quality housing and high concentrations of Homes in Multiple Occupation in some areas which create poor living conditions.

Question 3

There is repetition in the list of issues.

- Re: Poor quality housing and high concentrations of Homes in Multiple Occupation in some areas which create poor living conditions.
This mixes two points:
 - There should be limits in the proportion of HMOs in any street/area.
 - Much of the poor quality housing results from development undertaken using permitted development rights (eg conversion to residential) and from over development.
- Add: Need for more social council housing that can remain in public ownership. Eg North Downs Housing
- Add: Too many town centre sites that could have been used for general housing have been developed for student and other C3 housing. This has distorted provision and has been fuelled by developers avoiding having to contribute to SANG and by a perception it is more practical to organise evacuation of students in a flood event.

Question 4

Student housing to be managed to encourage use of campus and college land for student blocks and to avoid over domination of HMOs in any street/area.

Social council housing to be encouraged and remain public in perpetuity.

Homes created through permitted development to be of a higher standard.

Question 5

Prosperity and economic resilience

Question 6

Our top 3 issues

- threats to existing employment sites and floorspace from non-employment uses, especially housing, in the context of an increase in permitted development rights and the pressure for more housing delivery
- need for flexible employment space including shared workspaces
- traffic congestion being a barrier to economic growth and business retention

Question 7

There is repetition in the list of issues, in relation to the mix of uses needed for the future. Various of the issues could be condensed into:

- a forward-looking approach geared to future business needs, promoting Guildford as a high value added, high tech, sustainable economy with strong links to quality of environment and a skilled workforce.

Question 8

Suggest: Forward-looking approach geared to future business needs, promoting Guildford as a high value-added, high tech, sustainable economy with strong links to quality of environment and a skilled workforce.

A robust policy approach will be required to prevent loss of business use to residential. This is not only damaging to the town's economy but also leads to the need to find new business use sites, potentially in Green/Grey Belt.

Question 9

Strongly support protection of smaller business sites. Without planning recognition there is danger such sites will be lost to residential and either business will become a Green Belt activity or Guildford will become a dormitory town with residents having to travel elsewhere for crucial services.

Development in Guildford has been shaped by a number of helpful SPDs including, crucially, the one for Slyfield. This should be referenced and incorporated into the Plan. The Plan should also capture SPDs and Design Codes *in relation to key business-related sites* including River Corridor (Bedford Square and the Law Court Area, Ladymead and Riverside, Walnut Tree Close, Millbrook), High Street side (North Street), University side (Cathedral Hill, Surrey Research Park) and business areas of all strategic sites (Blackwell Farm, Gosden Hill, Wisley, Garlick's Arch).

It will be important to make connections in the spatial strategy between business use and the flood scheme proposals and transport infrastructure.

Natural environment and heritage

Question 10

Our top 3 issues

- competing pressures on land availability to provide for social and economic needs whilst protecting the historic environment and valued landscapes, and achieving nature recovery
- need to improve water quality of rivers and other waterbodies and minimise water use
- significant road congestion which contributes to increased levels of air pollution

Question 11

We suggest making this section “natural environment, landscape and heritage”. Landscape tends to get lost, both in this section and in the next section on settlements and infrastructure. The Surrey Hills NL is a *landscape* designation. Landscape provides the context for so many aspects of planning in Guildford. We note that in the Plan Priorities section of this consultation document, landscape is included with natural and historic built environment.

Selecting only three priorities in this consultation section is a false choice. Topics are interrelated. Climate change and mitigation are also crucial.

In relation to water, the Plan should consider supply side as well as demand management. It is not sustainable to make unrealistic assumptions about cutting water use per person where there is no prospect of achieving such dramatically reduced use in practice. For example, home owners often install high pressure showers to replace low water-use services.

The link between waste water and ground water pollution and drinking water abstraction should be made clearer and the challenges addressed.

The link between traffic levels and congestion and air quality should be clearer. Levels of nitrous oxide will be an issue as Guildford expands still further, notwithstanding cleaner vehicles.

Question 12

A Plan wide policy is needed on landscape and design. The downland landscape is such a feature of Guildford, and the Landscape Character Assessment should be incorporated into the Plan and into design codes. **The Plan needs to give an early positive steer to developers of what makes Guildford distinctive.** Working with the landscape is a key part of good design. Too many developers apply design logic from schemes that have worked in flat locations such as Cambridge, Oxford or London, that are overly blocky and obscure landform in a Guildford context. The approach of tall buildings around the edge of a development rarely works well in a Guildford context, creating built forms that are too blocky for the landscape.

- **Siting lower buildings to the edge, with higher elements set withing a scheme, can work better in the downland landscape.**
- **Reflecting the incline of hills, rather than masking changes of gradient, can also improve design sensitivity and sense of place.**

Referencing the heights and views SPDs will also be crucial.

We propose a **policy, linked to design guidance, on working within a downland setting.** This would include features such as

- **working with gradient and views,**
- **avoiding blocky designs,**
- **the importance of roofscape**
- **and the value of soft green edges and buffer strips around developments and settlements.**

At the EIP for the current Plan, the inspector agreed that provision of green buffers around strategic sites should be “beefed up”. In spite of this, the approach has not been followed through to delivery and a **policy is required** to achieve this.

There should be a **policy on the way the green and historic character of Guildford contribute to its economic success and resilience**. This should go beyond blue-green infrastructure provision and resilience, to capture the way the environment and character underpin the economy and well-being.

Question 13

We warmly welcome the intended Wey Navigation policy topic. This should include the intention to secure **continuous pedestrian access and green landscaping along both banks of the Wey**.

We warmly welcome the proposed policy on shopfronts and advertising. This has been a strong feature of shaping change for the better in Guildford, allowing shop fronts to change and adapt to changing needs while retaining characteristics that give the historic centre its valued and distinctive character.

Settlements and infrastructure

Question 14

Our top 3 issues

- maximising brownfield opportunities and minimising the release of Green Belt
- need to protect important views
- need to protect the existing identity of settlements.

Question 15

We selected three priorities as presented but would wish to record the following:

Note: While wishing to see efficient use made of brown field sites, and supporting these being given priority over Green Belt development, we would not support over-development and town cramming, a danger highlighted by the draft SE Plan. As stated in our comments on the spatial strategy section, we would support an approach based on overall sustainability and capacity. While seeking to be innovative, it will also be important to recognise that a fundamental tenet of sustainable development is recognition of limits.

Note: In supporting the priorities relating to views and protecting the existing identity of settlements, we are not suggesting resistance to change. We are instead seeking to convey the importance we attach to achieving change for the better that retains and works with characteristics that are crucial for distinctive identity.

We see the encouragement of more sustainable transport as a crucial part of the Plan. This also needs to be realistic. For example, the Sustainable Movement Corridor has not materialised, and further loss of car park spaces will destroy the town centre. High parking charges are already causing great harm to businesses.

Congestion has not gone away, even with new work patterns.

Parking is still needed.

Partial development of sites, without the provision of infrastructure, is an issue that needs acknowledging and managing.

Question 16

Landscape:

We attach great importance to the National Landscape and its setting, Nature Recovery Areas, making Guildford a centre of excellence for electric vehicle use and green landscaping, and to addressing sustainable travel in a way that works on our narrow gap town, road network.

Landscape and design – Please see our comments on this topic in the Natural Environment and Heritage Assets Section.

Green Belt - Please refer to all our Green Belt comments in the Spatial Strategy section.

Density:

We oppose minimum residential density standards for the town centre and other locations with high connectivity. The expectation of efficient use of land is already set out for such locations in national guidance and more specific densities should be determined positively on a case-by-case basis linked to site assessments and landscape parameters.

Infrastructure:

Robust policies are required to avoid a repeat of the failure of infrastructure delivery in the current LPSS. In addition to needing a schedule, **this Plan should be linked to a Community Infrastructure Levy or equivalent from the outset**. Far too much development has been allowed without contributing sufficiently to essential infrastructure. **Development reliant on infrastructure should not be able to proceed without it.**

A policy is needed to prevent partial development avoiding infrastructure investment, and to ensure any early income generated is invested in infrastructure for the next phase.

Question 17

We welcome the intention to identify where Design Review, masterplans, design codes and other design processes will be required.

Key Local Plan priorities

Question 18

SWOT:

Strengths:

Attractive interface between **established** settlements and countryside with soft, green edges rather than run down urban fringe, intrusive advertising and urban clutter, or large warehouses.

Management of advertising and changes to retail and other business frontages while adapting to evolving needs.

Weakness:

Overstretched infrastructure of pretty well every type.

Physical constraints of being a gap town with many land uses compressed in the gap and narrow roads.

To public realm and barriers add “layout of development” to start of list of barriers. River is not really a barrier to the river, more to connectivity either side.

Opportunities:

The River Wey for leisure and visual amenity with potential for continuous access and green corridor along each bank.

Threats:

Poorly considered and short term planning policies and decisions, such as some changes under permitted development or planning decisions taken using the tilted test.

Developers gaming the system

Question 19

We broadly welcome the priorities, with the following adjustments:

1. Prioritise brownfield development and make effective use of land to reduce pressure on the countryside add while avoiding overdevelopment that harms valued landscape character.
2. Focus growth on sustainable locations that maximise access to services and facilities by public transport and active travel reducing reliance on the private car
3. Ensure the timely delivery of the necessary infrastructure to support planned growth add and deficits.
4. Meet the needs of different groups in our community by delivering a sufficient supply, mix and type of homes including maximising delivery of affordable homes
5. Create inclusive neighbourhoods that encourage healthy and active lifestyles and support the well-being of our communities
6. Support a strong, resilient and diverse local economy by providing a sufficient range of high quality and well-located employment space to meet the needs of our business community
7. Improve the competitiveness, vitality and vibrancy of Guildford town centre as a key economic, cultural and social hub
8. Protect and enhance the natural and historic built environment, the Surrey Hills National Landscape and support nature recovery add and characteristic soft green edges to settlements.
9. Deliver well-designed buildings and places that enhance local identity add and are sensitive to the downland landscape.
10. Reduce carbon emissions and increase resilience to climate change through mitigation and adaptation measures

Guildford Local Plan engagement

Question 20

Do you agree with the methods of engagement outlined in Section 6 and shown for each plan-making stage shown in Table 3?

Please tell us what should be removed or changed, and whether there any other ways you would like to be engaged.

Role of Residents Associations and Parish Councils

Unlike many other towns in Surrey, Guildford does not have a Town Council. This makes it especially important that the Council works closely with RAs, as well as with rural Parish Councils, in the preparation of the Plan. Currently, we feel very shut out. Of course, you will want to hear from “hard to reach” groups and different demographics. We ask that this is not at the expense of engaging with us just as you would with the University or businesses. We are networked in our communities and, as we move to a West Surrey unitary structure, our potential contribution will become ever more important in preventing Local Government being seen as remote.

Any other comments

Question 21

Is there anything else you would like to tell us that is not covered by the questions above?

Local Government Reorganisation

We seek assurances on fairness of approach and meaningful community engagement in the next stages.

If you are a resident of Guildford borough, and are responding as a resident (rather than representing a business or organisation), please complete our anonymous residents' survey here:

<https://guildford.inconsult.uk/GLPS26Dem/consultationHome>