

# GUILDFORD BOROUGH COUNCIL **FINAL**

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**FULL COUNCIL MEETING** – 17<sup>th</sup> September 2013

Julian D S Lyon MBA FRICS on behalf of The Guildford Society

I am Julian Lyon, a lifelong resident of Guildford and a Chartered Surveyor, running a portfolio of more than 150 million square feet of buildings, and many thousands of acres of land across Europe.

I am addressing you tonight as a member of the Executive Committee of The Guildford Society, having been given the challenging role of managing the **GSoc** response to the Local Plan.

The Guildford Society would like to make it very clear that we aim to manage this process...

- Openly;
- with our members;
- in the best interests of Guildford, and
- without confrontation.

We speak for both 'loud' and 'quiet' voices in the Society, and will always seek to make comments objectively and with the intention of helping to deliver a good robust and defensible Local Plan.

We have been through all of the elements of the Evidence Base that have been recently published and will have comments to make on those in due course.

In the meantime, we have one **particular** issue that we would like you to recommend to your officers. We would like them to urgently go back and rethink the treatment of the Guildford Urban Area as **one single settlement** of more than half of the Borough's population, afforded as much significance in the Settlement Profile Report as, say, Chilworth or Holmbury St Mary.

The Guildford Urban Area needs to be broken up into its constituent settlements – such as Merrow, Burpham, Onslow, Stoughton, Park Barn, etc., - so as to ensure that local centres are taken into account when considering Local Plan options.<sup>1</sup>

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<sup>1</sup> This is evident when looking at potential Development Areas around the town which are then qualified by reference to walking routes to Guildford Town Centre rather than the nearest neighbourhood centre

The one stand-out issue that has got people energised so far, however, is the Green Belt and Countryside Report prepared for your officers by Pegasus and its treatment of the Surrey Hills Area of Outstanding Natural Beauty.

The report itself is a good reference point for many of the areas we will need to consider carefully over the coming months. The methodology adopted by Pegasus is, in our view, flawed in a few key areas<sup>2</sup>.

Irrespective of those details, the reason I have asked to address you this evening is to request that you agree **and put on record** that

1. there can and will be no softening of the presumption against development and that

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- The selection of segments around the town according to roads but ignoring rivers and rail which are much more of a separation than a road;
- The division of the segments into parcels which may well be too small in many cases and produce some odd results;
- The failure to consider a difference between major redrawing of the Green belt in a couple of places versus minor tweaking which – if implemented and the exercise were repeated – would lead to a systematic sequential erosion of the Green Belt in certain places;
- The failure to apply a subsequent (or prior) screening of the sites for AONB seems to be a mistake – notwithstanding the Inspector’s comments at Waverley (or even perhaps because of them).

2. there can and will be no dilution of the 'very special circumstances' test that applies when considering any application for development in an Area of Outstanding Natural Beauty (as endorsed post NPPF by the High Court in the Cherkley case against Mole Valley – where the judgement was published within the last four weeks or so).

Furthermore, we would like the Council to make it clear that, pending delivery of the Local Plan in at least draft form, the Strategic Housing Land Allocation Assessment already includes sufficient identified sites to meet the assessed need (notwithstanding the Strategic Housing Market Assessment has not yet been prepared or published).

Please, therefore, confirm by agreement of the Full Council, that a shortfall in provision of housing in the years to date and the need to encroach on the Green Belt will in no way by itself represent 'very special circumstances' nor any reason to bring forward land in the AONB.

Thank you