The Guildford Society

response
to

GUILDFORD BOROUGH COUNCIL

Issues and Options Consultation
towards the new Guildford Borough Local Plan

November 2013
The Guildford Society response to GUILDFORD BOROUGH COUNCIL Issues and Option Consultation
November 2013 - DRAFT 2a

ISSUES & OPTIONS CONSULTATION

October & November 2013

This document is The Guildford Society’s formal response to the first stage of the development of a new Local Plan for Guildford Borough, to replace the Adopted 2003 Local Plan. Links to the Council’s documents are set out below:


The Guildford Society has more than 450 Members and is itself a member of Civic Voice.

The Aims of the Guildford Society are to:

- Conserve all that is best about Guildford;
- Promote and encourage high standards of planning and architecture;
- Raise the level of public awareness;
- Provide a forum for public debate about heritage issues affecting Guildford;

The Guildford Society has held three specific events (free of charge and open to non-members) alongside the Guildford Borough Council consultation process:

Monday 23rd September – Presentation of The Guildford Society’s initial findings in respect of the Evidence Base;
Thursday 17th October – Presentation and Discussion with Councillor Monika Juneja, Lead Member with responsibility for the Local plan;
Monday 4th November – Presentation of The Guildford Society’s draft responses to the Issues and Options Consultation for discussion and feedback

A draft of this Consultation Response was circulated to each member of the Executive Committee of The Guildford Society on 9th November and responses were received from the Planning Group, the Transport Group and the Design & Heritage Group as well as from individuals.

The final working draft [has been] made available to the wider membership of the Guildford Society one week before the deadline for submission and comments received [have been] incorporated into this response.

Amongst the Executive Committee and the several Sub Groups a web-site has been used (http://guildfordplan.com) as a form of on-line whiteboard to ensure the maximum possible collaboration and to make sure this response is representative of our full membership.
Introduction

The form of this response is that each question has been reiterated – along with the options where provided by Guildford Borough Council – and the main comments of The Guildford Society have been given in response to each question with fuller information, where applicable (including, in some cases, a separate report or commentary), in Appendices annexed to this document.

Whilst the document itself is a lengthy work, it is based on several thousand pages of Evidence Base and a Consultation Document of 254 pages including appendices.

A very substantial amount of work and analysis has gone into preparing the response for The Guildford Society on behalf of its membership and the wider community of Guildford who share our objectives. **The response of the Guildford Society should, therefore, be afforded due attention as if it were a statutory consultee – not to override the views of others but as a serious and considered analysis and commentary.**

In general, whereas The Guildford Society has attempted to retain the structure and sequence of the questions raised specifically by the Issues and Options consultation, there are some questions where topics discussed fall into several categories (for example ‘sustainability’, ‘need’, ‘affordable homes’). We have sought, in this introduction, to apply a definition and understanding to these and the use of such terms in our submission should (unless otherwise stated) be taken in our response to be as defined.

**In some cases our definitions differ from those used by the Council in Appendix A of the consultation (for example, ‘Affordable Housing’), in which case we contend that there needs to be greater clarity or a change in description for the purposes of developing the Local Plan.**
EXECUTIVE SUMMARY
[to be completed]
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DEFINITIONS, EXPRESSIONS and CONCEPTS

Affordable Housing

The definition of ‘Affordable Housing’ used by the Council as a policy term is at odds with the identified shortcomings of the housing market, in which the median house price in 2012 was £334,058 (source: Appendix B) whereas the average weekly earnings was £331.60 (source: Appendix B), an affordability ratio of 10.14 times gross income. The Guildford Society contends that the challenges faced by Guildford (its population and its economy) are strongly affected by the lack of housing that workers can afford. This is in addition to the need for the classification of Affordable Housing adopted by the Council in Appendix A.

The 2007 Strategic Housing Market Assessment (‘SHMA’) Guidance suggests that to understand how many people cannot afford housing in the open market, thresholds of 3.5 times gross income (single earner) or 2.9 times gross income (two earners) for owner occupation, and 25% of gross income for private renting should be used. This suggests that an average house price of £115,267 would represent the affordability threshold for house prices or a rental rate of £686.11 in the letting market – no doubt the Strategic Housing Market Area Report will provide feedback as to the actual affordability of the housing stock to would-be buyers and tenants. It is, however, for the Council to choose appropriate levels for Guildford Borough, based on local evidence.

In a market with such high median house prices, there is a risk that adopting a policy of ‘affordable housing’ for one end of the market spectrum and relying on private housing for the other:

a) Leaves those in social rented housing no prospect of escaping from the ‘subsidised’ sector; and
b) Means that key workers will continue to have to commute from far outside the Town and Borough, contributing to other issues such as traffic congestion

This important aspect of policy-making and strategic land use must not be lost in a perceived need, in consultation, to adhere to prescribed definitions.

The Society recommends that there is greater clarity in consultation between the concept of ‘Housing which is Affordable’ (which the average person, unversed in planning matters, may assume is what is meant by the term ‘Affordable Housing’) and ‘Social Rented, Affordable Rented and Intermediate Housing’.

The Guildford Society recognises that, from a POLICY perspective, the Council will need to follow the FULL definition in the National planning policy Framework, 2012 (‘NPPF’), which is:

“Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.”
Social rented housing is owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Communities Agency.

Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing.

Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable).

Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing.

Homes that do not meet the above definition of affordable housing, such as “low cost market” housing, may not be considered as affordable housing for planning purposes.”

Taken literally, the first paragraph of the NPPF definition may well describe a large number of would-be households in Guildford simply because of the high median house price as a multiple of income.

On this basis, the waiting list for ‘Affordable Housing’ may be exaggerated where people cannot afford full market prices but where a policy which enables and encourages equity sharing might allow a healthier combination of Housing which is Affordable and Social Rented, Affordable Rented and Intermediate Housing could help to redress the balance and reduce dependency on registered social landlords.

An indication of the complexity of this issue is contained in a discussion thread on the website of the Royal Town Planning Institute (accessed 5th November 2013 at 9.16am) (http://www.rtpi.org.uk/knowledge/networks-groups-and-forums/rtpi-cih-planning-for-housing-network/definitions-of-affordable-housing/)

**Capacity**

Measured against the demand and need elements of the Evidence Base and emerging Local Plan is a notion of Capacity, which should be interpreted in this instance as development which can be sustainably accommodated (see ‘Sustainability’ below) within the existing environment and infrastructure.

Capacity could, doubtless be increased, say, by taking certain steps to increase infrastructure or expand urban boundaries into Green Belt and Countryside. Each measure taken or proposed should be qualified in terms of the additional net Capacity such a measure would achieve.
The Local Plan should promote Locally-Sustainable development to meet Need in co-operation with a wider area across local authority boundaries, having regard to the fact that the NPPF, in addition to requiring a positive approach to development, makes it clear that plans:

- Have an environmental role in contributing to protecting and enhancing our natural and historic environment (¶17)
- Should take account of the different roles and character of different areas, and recognise the intrinsic character and beauty of the countryside (¶17, bullet 5)
- Contribute to conserving and enhancing the natural environment (¶17, bullet 7)
- Conserve heritage assets (¶17, bullet 10)
- Protect and enhance valued landscapes (¶109)
- Minimise impacts on biodiversity (¶109)
- Great weight should be given to Areas of Outstanding Natural Beauty (¶115)

An objectively assessed capacity to accommodate development should form a vital part of the Local Plan Evidence Base and the Guildford Society is concerned that it is not evident from the documentation that CAPACITY has been adequately addressed.

**Demand (see Need)**

The term ‘Need’ is used frequently throughout the Consultation Document and the Evidence Base and is often misapplied where ‘Demand’ should be used.

‘Demand’ is an economic term where the amount of supply and the price of that supply will determine the level of demand.

Many people would like to live in Guildford but either cannot (because there is insufficient supply) or cannot afford to (because the price is too high) or some combination of both.

If we were to adopt policies whereby Demand was met by providing effectively limitless subsidised housing, it would be reasonable to assume the levels of Demand would be impossible to sustain within the local context.

The Local Plan should focus on both Need and Demand but be explicit as to which category of requirement is being addressed under each scenario.

Where an ‘Affordable Housing’ ratio is used (in Planning Policy terms) of, say 35%, it should go without saying that there must be sufficient Demand at market prices to purchase 65 homes out of every hundred homes developed in order for 35 homes to be provided to meet the Need of those who cannot afford homes at market prices.

**Need**

The term ‘Need’ is used frequently throughout the Consultation Document and the Evidence Base and is often misapplied where ‘Demand’ should be used.
‘Need’ is a social or societal term and should be taken to mean Demand or requirement which we have a moral or social duty to accommodate or which, if not accommodated, would lead to the Town and/or Borough being unsustainable (see Sustainable).

The National Planning Policy Guidance (‘NPPG’) notes that the Need for housing (in the context of the rest of NPPG) refers to the scale and mix of housing and the range of tenures that is likely to be needed in the housing market area over the plan period. It should cater for the housing demand of the area and identify the scale of housing supply necessary to meet that demand.

Furthermore, NPPG notes that Need for all land uses should address both the total number of homes or quantity of economic development floor space needed based on quantitative assessments, but also on an understanding of the qualitative requirements of each market segment.

There are two particular types of Need which are categorised in “Practice guidance on need, impact and the sequential approach” (CLG Dec 2009), namely:

- Quantitative Need
- Qualitative Need

While it is mainly used in respect to retail needs, the general principles of assessing Quantitative Need can be applied to other uses. The five key steps (paraphrased for Housing) are:

- What geographic area are we concerned with?
- How much can people afford?
- What do people do now?
- How does future Need compare with current Supply?
- How much new affordable housing can be economically delivered?

Qualitative Need is a more subjective concept. Five factors are frequently identified, although others may be relevant.

- Qualitative deficiencies or ‘gaps’ in existing provision
- Consumer choice and market availability
- Overcrowding of existing homes
- Location specific needs such as deprived areas, and
- The quality of existing affordable housing

An alternative progressive assessment of what housing need is:

- ‘Don’t have it’: Sleeping rough.
- ‘Have it now, but not secure or safe’: Instability or, for example, issues of domestic violence.
- ‘Have it now, but don’t have enough of it’: Overcrowding.
- ‘Have it, but poor quality’: Dilapidated, cold, damp, etc.
- ‘Have it, but doesn’t meet my needs’: For example, physical disability.
• ‘Have a home, but nowhere legal to stay’: Need a place to park my caravan (Gypsies and Travellers).
• ‘Have it, but need physical or social support’: For example, physical frailty, mental ill-health, learning disability.
• ‘Have it, but too expensive’: Housing costs an unacceptably high proportion of disposable income.
• ‘Have it, but it’s not where I need it’: For example, lack of housing near workplace in rural areas.

Households within many of these groups have the potential to become classified as statutory homeless.

These may not be the ideal objective tests but they (or similar analysis) absolutely should form part of the equation of Need when considering Objectively Assessed Housing Need (see below).

Consider in any event the judgement of the High Court in the Cherkley Court case (August 2013) reproduced at APPENDIX 2B – Mole Valley – Cherkley Decision in which Mr Justice Haddon-Cave notes:

“Much of the legal argument revolved around whether a “need” for further golfing facilities could be demonstrated as required by the policy matrix. The developers argued that proof of private “demand” for exclusive golf facilities equated to “need”. This proposition is fallacious. The golden thread of public interest is woven through the lexicon of planning law, including into the word “need”. Pure private “demand” is antithetical to public “need”, particularly very exclusive private demand.”

Objectively Assessed Housing Need

The use of this term arises from Section 6 of the NPPF which says:

“47. To boost significantly the supply of housing, local planning authorities should:

• use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;”

It is unfortunate that, whereas the principal approach to developing an understanding of the demand for market and affordable housing within a housing market area is through the preparation of a Strategic Housing Market Assessment (‘SHMA’), this was one vital component missing from the Evidence Base for the purposes of this consultation.

Furthermore, The Guildford Society is concerned that no scoping exercise was available to allow the public at large to understand what the Council considers its strategic housing market area to be.
As a starting point for a definition is the presumption that any variance from assumptions of housing need (a combination of Demand and Need) used by the Office for National Statistics (‘ONS’) or the Department for Communities and Local Government (‘CLG’) must be clearly evidenced and justified so they can be fully explained to local stakeholders and, if used in identifying the level of housing in the Local Plan, at its formal examination.

The baseline population and household projections provided in the How Many Homes Toolkit (http://www.howmanyhomes.org) form the starting point for assessing requirements. In identifying the level and type of housing to be delivered in a local plan, this baseline, and any alternative scenarios proposed, need to be assessed in relation to factors including, but not limited to:

- Environmental, infrastructure and services capacity.
- Economic objectives.
- The timing and phasing of development.
- The ability of the local market to accommodate development.
- The willingness of the development industry to build it.
- The availability of land – is there enough land identified through the Strategic Housing Land Availability Assessment (SHLAA), is it in the right place, and does it provide sufficient choice to deliver the new housing required?
- Viability considerations.

A clear definition of the expression ‘Objectively Assessed Housing Need’ is clearly of paramount importance in order to evaluate a clear strategic approach to arriving at an acceptable and appropriate housing target. The definition in Appendix A of the Consultation document does not achieve that objective.

This should perhaps be explained as a combination of Housing Factors, Demographic Factors and Economic Factors such as:

- Housing
  - SHMA estimates of Need for ALL types of housing, including ‘Housing which is Affordable’ and ‘Social Rented, Affordable Rented and Intermediate Housing’; (not yet available)
  - Past housing delivery rates;
  - Regeneration, renewal and replacement opportunities;
  - Vacancy rates and second homes;
- Demographic Factors
  - Natural change;
  - Net migration;
  - Headship rates (the number of people who are counted as the heads of households);
  - ONS & CLG projections and Census 2011 (not yet available)
- Economic Factors
  - Current employment;
  - Employment forecasts;
EVIDENCE

NPPG notes that any assessment of Need should be realistic in taking account of the particular nature of that area (for example geographic constraints and the nature of that market area). Assessing development Need should be proportionate and does not require local Councils to consider purely hypothetical future scenarios, only future scenarios that could be reasonably expected to occur.

NPPG continues that an Objective Assessment of Need is based on FACTS and UNBIASED EVIDENCE. The Council should not apply constraints to the overall assessment of Need, such as limitations imposed by the supply of land for new development, historic under-performance, infrastructure or environmental constraints. However, these considerations will need to be addressed when bringing evidence bases together to identify specific policies within the emerging Local Plan.

Sustainability
The Consultation Document and Evidence Base use the terms ‘Sustainability’ and ‘Sustainable’ extensively for different purposes and the document is all the less robust as a result.

The Government’s accompanying guidance to the NPPF (available at http://planningguidance.planningportal.gov.uk/) highlights that:

"International and national bodies have set out broad principles of sustainable development. Resolution 42/187 of the United Nations General Assembly defined sustainable development as meeting the needs of the present without compromising the ability of future generations to meet their own needs. The UK Sustainable Development Strategy Securing the Future set out five ‘guiding principles’ of sustainable development: living within the planet’s environmental limits; ensuring a strong, healthy and just society; achieving a sustainable economy; promoting good governance; and using sound science responsibly.

The purpose of the planning system is to contribute to the achievement of sustainable development. The policies in paragraphs 18 to 219 [of the NPPF], taken as a whole, constitute the Government’s view of what sustainable development in England means in practice for the planning system."
There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:

- an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being; and
- an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

These roles should not be undertaken in isolation, because they are mutually dependent. Economic growth can secure higher social and environmental standards, and well-designed buildings and places can improve the lives of people and communities. Therefore, to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system. The planning system should play an active role in guiding development to sustainable solutions.

Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people’s quality of life, including (but not limited to):

- making it easier for jobs to be created in cities, towns and villages;
- moving from a net loss of bio-diversity to achieving net gains for nature;
- replacing poor design with better design;
- improving the conditions in which people live, work, travel and take leisure; and
- widening the choice of high quality homes.

Plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas.

The Local Plan and its Evidence Base should be sense-checked to ensure that all references to ‘sustainability’ are appropriate and are not misleading.
For example, in the Green Belt & Countryside Report ('GBCS') the so-called sustainability indicator is “distance from facilities”. This measure is part but not all of the picture as far as Sustainability is concerned.

It is, therefore, not enough to define what is meant by the term ‘Sustainability’ in each instance in the Evidence Base if does not, of itself, amount to correctly applying the concept of Sustainable Development.

If the Council intends (as it should) to assess the “Sustainability” of developing in various places in and around Guildford, it also must take account, in the round, of how we develop without compromising Guildford for future generations.

The Evidence Base does not go far enough to identify our irreplaceable assets, such as (but not limited to) AONB landscape, ancient woodlands, valued historic landscapes and features, etc.

How can we meet Need in ways that take care of valued qualities such as character and distinctiveness, clean air and water, places for recreation, etc.

Reducing and managing the impact of traffic and transport is undeniably important. We also have responsibility to embrace change and contribute to a strong, healthy and just society.

We are not permitted to use it to resist change, but, correctly applied, the concept of Sustainability should enable us to “meet the needs of the present without compromising the ability of future generations to meet their own needs.”

**GROWTH**

It is not the purpose of The Guildford Society to obstruct growth nor to argue that growth should not occur nor be accommodated in the Society’s ‘Back Yard’.

Sustainable development is about positive growth – making economic, environmental and social progress for this and future generations, which The Guildford Society absolutely accepts – but it is also about protecting and enhancing those elements of Guildford that make it special and which, if not adequately safeguarded, could be placed at risk from development that, whilst it might be regionally justifiable, may not be locally sustainable.

The downsides of growth must, therefore, be explored fully, so as to produce a balanced Local Plan, which will protect Guildford’s character and heritage to be handed down to the next generations – a character and heritage which the present generation in Guildford and those before us have enjoyed over many years. This is the crux of what locally sustainable development is.
CONSULTATION QUESTION 1 – FACTS ABOUT THE BOROUGH

Q1. Facts about Guildford Borough:

1.1. The summary at APPENDIX B is somewhat selective in terms of data from the extensive Evidence Base and it is by no means clear from where the Strengths and Weaknesses are drawn and their overall contribution to or impact on the preparation of the Local Plan.

1.2. The data presented are in disparate formats and would benefit from consistent presentation (such as, under ‘Geography’ having the land area and percentage for each category rather than some as areas and some as percentages).

1.3. Population:

1.3.1. 2011 – Borough Population 137,183 (2nd in Surrey)
   a. Balance of Male & Female
   b. 5.8% <5 years old;
   c. 15.6% >65 years old

1.3.2. Density 5.1 people per Hectare

1.3.3. Average Household Size is 2.43
   a. Ergo: 2.1 Households per Hectare

1.3.4. Community is not very ethnically diverse
   a. 91% is white (0.4% Gypsy or Irish Travellers)
   b. Largest ethnic group is Asian
   c. Much more diversity among young people

1.4. Geography:

1.4.1. Borough is 27,093 Hectares – 2nd largest in Surrey
1.4.2. [circa 24,113 Ha] 89% of the Borough is designated Green Belt
1.4.3. 9,898Ha (37% of the Borough) is Surrey Hills AONB (National Designation)
1.4.4. [circa 11,921 Ha] 44% of the Borough is AGLV (Local Designation)
1.4.5. [circa 3,015Ha] [circa 11% of the Borough] is within Thames Basin Heaths SPA
1.4.6. [circa 1,626 Ha] 6% of land is within 400m of an SPA site
1.4.7. [circa 12,734 Ha] 47% of land is within 400m-5km of an SPA site
1.4.8. [circa 2,548Ha] [circa 9% of the Borough] are Special Areas of Conservation (‘SAC’) within Thursley, Ash, Pirbright and Chobham SAC
1.4.9. 13 Sites of Special Scientific Interest (SSSI)
1.4.10. 81 Sites of Nature Conservation Importance (SNCI)
1.4.11. Five local nature reserves
1.4.12. Three main water courses
  a. Rivers Wey, Blackwater and Tillingbourne
1.4.13. The Basingstoke Canal on the western boundary
1.4.14. Two navigation channels
  a. Wey Navigation and Godalming Navigation
1.4.15. Four nationally defined countryside characters:
  a. Thames Basin Heaths,
  b. Thames Basin Lowlands,
  c. the North Downs and
  d. the Wealden Greensand
1.4.16. 1,080 nationally Listed and 310 locally Listed Buildings
1.4.17. The Appendix fails to provide the population and geographic area of the Guildford Urban Area.

1.5. Economy & Jobs – Strengths
1.5.1. Educated workforce - 62.2% 5xGCSEs at A*-C
1.5.2. Strong past performance - 2007 GVA £3.830bn
1.5.3. Most competitive non-metropolitan centre in the UK
1.5.4. Low unemployment at 4.7%
1.5.5. High average income - £631.60 per week.
1.5.6. Range of employment sites - 2008: 1.136m sqm
1.5.7. Good road and rail networks
1.5.8. Strong tourism (£204m/yr) - 2009: 4.2m visitors per year
1.5.9. Leader in new technology
1.5.10. Sub-regional shopping centre
1.5.11. Broadband speeds vary

1.6. Economy & Jobs – Weaknesses
1.6.1. Parts of the Borough with relatively high deprivation
1.6.2. Housing supply falling short
  median 2012 price £334,058
  a. [median price ratio to average income: 10.14]
1.6.3. Employment mostly service and public sector
1.6.4. Increasing economic competition from Gtr London
1.6.5. Current lack of land for economic development
1.6.6. Congested roads
1.6.7. Transport demand higher than most parts of the UK
1.6.8. 26.6% in/out commuters travel >20km to work
1.6.9. Skills mismatch between residents and employers
1.6.10. Lack of new retail floor space

1.7. Access & Transport – Strengths
1.7.1. Direct connections to strategic road network
1.7.2. Borough has 12 railway stations
1.7.3. Good Park & Ride network
Avge 1,000-1,500 return car journeys replaced per day

1.7.4. Local bus network
45% use bus at least once per month

1.7.5. Good network of cycle & pedestrian routes
25% cycle once per month or more

1.8. Access & Transport – Weaknesses
1.8.1. Culture of dependence on private cars
54.7% drive to work
86.1% households ≥1 car
1.8.2. Rural areas have limited car-free access to key services
1.8.3. High volumes of traffic and congestion
1.8.4. Gyratory has recurrent peak period traffic congestion
1.8.5. Traffic flows in Surrey much higher than national average
1.8.6. Pedestrian access between Town Centre & railway is ‘uninviting’
1.8.7. Dominance of traffic on principal cycle/pedestrian routes
1.8.8. Culture of dependence on private cars
1.8.9. 54.7% drive to work
1.8.10. 86.1% households ≥1 car
1.8.11. Rural areas have limited car-free access to key services
1.8.12. High volumes of traffic and congestion
1.8.13. Gyratory has recurrent peak period traffic congestion
1.8.14. Traffic flows in Surrey much higher than national average
1.8.15. Pedestrian access between Town Centre & railway is ‘uninviting’
1.8.16. Dominance of traffic on principal cycle/pedestrian routes

1.9. Homes & Communities – Strengths
1.9.1. Generally high quality of life
one of 10 least deprived boroughs in England (2010)
1.9.2. 96.8% of residents in good health (2011)
1.9.3. Crime in Surrey lower than national average (2010)
1.9.4. Good quality housing
2011: 56,400 homes
85% privately owned
1.9.5. Good nurseries, schools, colleges and a university
1.9.6. Some of best education outcomes in the country
1.9.7. ‘Great leisure, cultural and recreation facilities’

1.10. Homes & Communities – Weaknesses
1.10.1. Large and growing population (CLG 2010: expected to rise to 152,426 by 2030 versus 137,183 in 2011 [11.11% increase or 0.556% per year]
1.10.2. Borough has no up to date Local Plan for new homes &c.
1.10.3. Insufficient affordable homes
est. annual need 1,194 (2009)
1.10.4. Ratio house prices to wages much higher than UK average
1.10.5. Lack of traveller pitches
1.10.6. Ageing population
1.10.7. Need more family homes
1.10.8. Residents in more deprived areas have poorer health and reduced life expectancy
1.10.9. Crime in specific pockets
1.10.10. 4.2% 16-18yr olds NEET (2011)

1.11. Environment – Strengths
1.11.1. Unique and important environments including habitats of European importance and nationally recognised landscapes
1.11.2. 89% of Borough is Metropolitan Green Belt
1.11.3. Significant amounts of natural and semi-natural open space - 1 Hectare per 45 people
1.11.4. 10,043 Ha of agricultural land
1.11.5. Mineral reserves

1.12. Environment – Weaknesses
1.12.1. Important environments limit opportunities to plan for sustainable development
1.12.2. Boundaries of Green Belt need to be reviewed to plan for sustainable development
   a. ✔️ NOTE: is this not for the Local Plan consultation to determine?
   b. Why should Green Belt be seen as a weakness – surely it would be more appropriate to state that the weakness is “Insufficient land that is not designated Green Belt in order sustainably to accommodate anticipated or actual Need.”
1.12.3. Strong development pressures on land in the countryside due to few allocated sites from 2003
1.12.4. Flood risks in some areas
1.12.5. Some heritage is poorly kept
1.12.6. Threat to bio-diversity due to climate change
1.12.7. Increasing car use has consequences for climate change and air quality

1.13. Summary Comments
1.13.1. The QUALITIES of Guildford as an historic town are understated in Appendix B.

1.13.2. The geographic constraints of a GAP TOWN are not mentioned in the Geography section.

1.13.3. The ‘Surrey Hills’ are not mentioned and the qualities of Guildford’s countryside are understated.

1.13.4. The Economy section has out of date information.
   a. There needs to be a brief but thorough diagnosis/analysis of the Guildford economy - more than just employment figures (which should be measured in terms of Gross Value Added to ensure we have a valid and constructive economic impression).
   b. There should be a brief statement about growth sectors and areas over the last few decades, which should help establish the basis for planning the physical infrastructure.
   c. Above all, this is the only section on the Economy since Appendix C does not include any Economic Report or Strategy documents.

1.13.5. The ‘quantitative’ look at Guildford fails adequately to reflect the qualitative aspects including but not limited to the following comments made by one of our members:

   Strengths
   a. Guildford is an immensely attractive place to live, shop and work, due to its historic centre with green views, the river, its pleasant suburbs, its unspoilt Areas of Outstanding Natural Beauty and its attractive villages. An added attraction is that most people are within walking distance of open green space.
   b. Guildford and its villages, many close enough to be within walking distance of each other and the town, are protected from sprawl by the Green Belt. This is a strength not a weakness.
   c. These qualities of town, countryside and villages all balance and complement each other, making the borough the most attractive place to live and work outside London. These are Guildford’s strengths.

   Internal Threats
   d. There is a very real threat to Guildford’s attractiveness from over-expansion if the perceived Need exceeds the CAPACITY of the Town and Borough to absorb such Need without fundamentally changing the character of
The Borough to accommodate extra traffic derived from more people, more shops, more businesses, more cars.

e. The school run, perhaps one of the biggest causes of local congestion, will increase as more and more children are dropped off by parents on their way to work.

f. Delivery vans, commercial vehicles and private cars will increase.

g. Great care will be required to ensure the development we are required to try to accommodate does not ‘kill the goose that lays its golden egg’ in Guildford.

h. Waverley Borough will be required to accommodate more housing than it had intended (witness the rejection of its Draft Local Plan – see APPENDIX 2A – Waverley Local plan Inspector’s Report) particularly around Cranleigh, which will inevitably bring cars through villages and lanes, to and through Guildford.

i. Other population centres undergoing expansion throughout the South East will increasingly burden Guildford with demands on our infrastructure, space and markets.
Diagram B2 of Guildford Area reproduced from the Consultation Document:
CONSULTATION QUESTION 2 – RESEARCH & EVIDENCE

Q2. Research and Evidence:

2.1. The list at APPENDIX C sets out various documents, some of which have been prepared or updated specifically and some of which seem to be somewhat outdated.

2.1.1. NPPF (158) says:

"Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals."

2.1.2. The Guildford Society is concerned that the Evidence Base is not complete and up-to-date (in particular, for the purposes of this Consultation, it is missing a current Strategic Housing Market Assessment ('SHMA') and an up to date Economic Report). As a result, it will be difficult to ensure that the assessment and strategies are integrated and this should be addressed urgently prior to publication of a Draft Local Plan.

2.1.3. It also seems as though the evidence is drawn from and prepared by a disparate group of consultants with differing briefs (many pre-dating the NPPF) and which result in conflicting (or at least not joined up) bodies of evidence which are difficult to navigate and which have presented a massive task for private individuals, Residents' Associations and The Guildford Society to assimilate.

2.1.4. Experience tells us, however, that these gaps or conflicts are precisely what developers will look for to argue in favour of development which we neither want nor necessarily need, and in places where such development might be damaging to the form and character of our Town and Borough.

2.1.5. Of particular concern to us is the Green Belt and Countryside Report ('GBCS') which, we believe, lacks strategic assessment and does not provide a sound basis for informing decisions. In some ways the Council has accepted that the logic is flawed by not...
including major development in Areas of Outstanding Natural Beauty (‘AONB’) in the Strategic Housing Land Availability Assessment (‘SHLAA’), but it must be inappropriate to label any land in AONB as a Potential Development Area (‘PDA’) in GBCS as it may give rise to consequences outside the Council’s control.

2.1.6. The Guildford Society does understand the dilemma of
a. ensuring that no stone is left unturned in a comprehensive reassessment of all land in the Borough; and
b. affording continuing and proportionate protection to the most sensitive sites.

2.1.7. The Guildford Society feels that the Council has been let down to a degree by its consultants, Pegasus, inasmuch as they have failed to interpret NPPF properly (presumably having been instructed long before NPPF was adopted), and consequently have allowed some of the most sensitive sites to be labelled as PDAs in the GBCS Report.

2.2. The following list is taken from Appendix C of the Consultation (in blue) and The Guildford Society’s summary comments below each of these:

2.3. Affordable Housing Viability Study and updates (2008, 2009 and 2011)
http://www.guildford.gov.uk/article/3959/Affordable-Housing-Viability-Study

2.3.1. Update 2011 prepared by ADAMS INTEGRA of Chichester (www.adamsintegra.co.uk)

http://www.guildford.gov.uk/CHttpHandler.ashx?id=10862&p=0

2.4.1. The AMR shows a shortfall of housing completions in each of the last five years meaning that the Council must identify land for 1,932 homes for development within the next five years (NPPF)

<table>
<thead>
<tr>
<th>Year</th>
<th>Net Completions</th>
<th>Housing Target</th>
<th>Surplus/ (Shortfall)</th>
</tr>
</thead>
<tbody>
<tr>
<td>06/07</td>
<td>357</td>
<td>317</td>
<td>40</td>
</tr>
<tr>
<td>07/08</td>
<td>478</td>
<td>317</td>
<td>161</td>
</tr>
<tr>
<td>08/09</td>
<td>130</td>
<td>317</td>
<td>(187)</td>
</tr>
<tr>
<td>09/10</td>
<td>227</td>
<td>322</td>
<td>(95)</td>
</tr>
<tr>
<td>10/11</td>
<td>188</td>
<td>322</td>
<td>(134)</td>
</tr>
<tr>
<td>11/12</td>
<td>261</td>
<td>322</td>
<td>(61)</td>
</tr>
<tr>
<td>12/13</td>
<td>230</td>
<td>322</td>
<td>(92)</td>
</tr>
</tbody>
</table>
The number of homes with planning permission that have not yet been built is 1,296 (as at 22 April 2013)

2.4.3. The AMR shows the number of Social Rented, Affordable Rented and Intermediate Housing units, falling substantially short of the SHMA Need of 1,194 units per year:

<table>
<thead>
<tr>
<th>Year</th>
<th>Number of new affordable homes (gross)</th>
<th>Percentage of total delivered</th>
<th>35% of Housing Target</th>
<th>Surplus/ (Shortfall)</th>
</tr>
</thead>
<tbody>
<tr>
<td>08/09</td>
<td>97</td>
<td>74.61%</td>
<td>111</td>
<td>(16)</td>
</tr>
<tr>
<td>09/10</td>
<td>50</td>
<td>22.03%</td>
<td>113</td>
<td>(63)</td>
</tr>
<tr>
<td>10/11</td>
<td>85</td>
<td>45.21%</td>
<td>113</td>
<td>(28)</td>
</tr>
<tr>
<td>11/12</td>
<td>68</td>
<td>26.05%</td>
<td>113</td>
<td>(45)</td>
</tr>
<tr>
<td>12/13</td>
<td>22</td>
<td>9.57%</td>
<td>113</td>
<td>(91)</td>
</tr>
<tr>
<td>Σ</td>
<td>322</td>
<td>31.08%</td>
<td>563</td>
<td>(243)</td>
</tr>
</tbody>
</table>

Source: Table 5 of the Consultation: Number of new affordable homes

2.5. Employment Land Assessment (2013)

http://www.guildford.gov.uk/ela

2.5.1. As an overriding view, this document does not purport to be a strategy document for Employment Land – it aims to spell out the need for employment growth based on assumed population growth. It identifies which land is in employment uses today and where more land needs to be provided to meet demand.

2.5.2. The main issue with this is that it is an organic approach to a situation that has been failing for many years, where a radical and ambitious approach is required.

a. Failing areas such as Walnut Tree Close and Woodbridge Meadows may well be better served as a new residential quarter (perhaps, if planned at a higher density than other quarters of Guildford, this area may accommodate a thousand or so new homes within easy reach of the...
town centre and station), whereas, properly connected, these businesses may have greater success in the other established business centres or even a new centre in the Borough.

2.5.3. On page 12 of the Report there is an assessment (Table 1) of the effectiveness of the Employment Policies in the 2003 Local Plan:

a. Policy E1 FAILED
b. Policy E2 Some Success
c. Policy E3 PARTIAL FAILURE
d. Policy E4 FAILED
e. Policy RE15 Some success at BTRE Vokes, FAILURE at Peasmarsh

2.5.4. This should be the clearest possible indicator that organic solutions will probably be insufficient and that what is required is an employment strategy based around an Economic Strategy.

2.5.5. It is consequently odd in the extreme that the Economic Report (2009 and in need of updating) and the Economic Strategy (2013) do not even appear as part of the Evidence Base at Appendix C.

2.5.6. Corporate Real Estate Executives for major companies have taken Guildford off the list of destinations for headquarters or significant operations due to two main longstanding issues:

a. TRAFFIC CONGESTION
b. LACK OF HOUSING THAT WORKERS CAN AFFORD

2.5.7. The Local Plan should present an excellent opportunity to rebalance the policy environment and to ensure that Guildford’s economy is pulling its full weight in future.

2.5.8. The ELA notes that the Guildford Urban Area has three principal employment centres:

a. Town Centre (Friary & St Nicholas Ward) – 23.5% of the employment floor area accommodating 31.4% of the employees

2.5.8.a.1. approximately 12% of the Town Centre Floor Space was noted in the ELA (Table 49) as available on the market in July 2013

2.5.8.a.2. NOTE: for the purposes of this analysis, the Evidence Base refers to Town Centre employment and the Town Centre as having a different boundary than that ascribed to it in the Guildford Town Centre Development Study, 2010 (see 2.9) and in other planning documents.
b. University & Research Park (Onslow Ward) – 25.7% floor area and 39.6% employees

c. Slyfield (Stoke Ward) – 26.6% floor area and 12.7% employees

d. The above figures are from ELA Table 2, p19

2.5.9. Each of these areas has major constraints to business and enterprise growth -

a. Town Centre has major congestion issues throughout but especially in the Walnut Tree Close – Woodbridge Meadows corridor (325,000 square feet of space accommodating 511 employees). Here the traffic congestion is so bad that it can take over an hour at peak times to get out onto the local road network. Unsurprisingly, businesses have taken opportunities of lease expiries and break options to relocate – typically away from Guildford altogether.

b. University & Research Park is also blighted by traffic congestion but mainly as a result of strategic failures of the A3. Again, reports of 45 minutes to an hour to leave the research park area put a great strain on an otherwise exemplary business environment for high-technology companies (knowledge industries) – although in the short term the traffic junction improvements on Egerton Road seem to have resolved some of the worst issues.

c. Slyfield has more industrial property than offices but relies on good quality logistics links to major highways. Traffic is once again an issue here – a link to the A3 would be a partial solution but there also needs to be a much better public transport link from early morning to mid/late evening to ensure that employees can get to Slyfield for shift work and non-standard hours.

2.5.10. Each of these locations can be resolved with careful and wider-reaching planning –

• a Master Plan for the wider town centre;
• a Master Plan for the University Quarter (including the proposed or potential westward extension of the town);
• a Slyfield Master Plan to include potential expansion.

2.5.11. These Master Plans should enable communication between themselves to ensure they do not preclude each other’s solutions but they should form Area Action Plans and be brought forward
with the Local Plan as Development Plan Documents, properly consulted and exposed to scrutiny by the Planning Inspectorate.

2.5.12. Above all, the Employment Strategy needs to be bolder than envisioned in the ELA – and the Economic Strategy needs to be more defined than the current ‘Economic Vision’ document and needs to form part of the Evidence Base.

2.5.13. At 2.1.5 the Report cites Paragraph 161 of the NPPF which explains the need to assess the “needs for land or floor space for Economic Development” and the need to assess the “existing and future supply of land...to meet the identified needs.”

2.5.14. On the one hand, neither the Economic Strategy nor the ELA seeks to identify an ambitious target for growth by attracting specific industries or sectors to Guildford. It seems only the University has such a strategy and its strategic Business Plan is not taken into account in the ELA or as an informative document in the Evidence Base. This should be addressed in the Local Plan so as to ensure that Guildford is capable of attracting and retaining businesses to be located in the town or its major business areas or elsewhere in the Borough.

2.5.15. On the other hand, the ELA does not give any indication as to why it would be inappropriate to consider Guildford as an attractive place for specific industries or sectors (such as, for example, severe limitations on the availability of Housing that is Affordable and the lack of suitable sites locally to accommodate sufficient additional housing to meet increased demand from pursuing a policy of targeted economic growth.

2.5.16. Equally, the ELA does not identify opportunities for the establishment and growth of vibrant SMEs rather than Corporate Headquarters if this is a more practical or desirable strategy to follow.

2.5.17. Consequently, the ELA and, if the Local Plan follows the ELA lead, the emerging Local Plan will be devoid of ambition or strategy to resolve some of Guildford’s key employment issues and opportunities.

2.5.18. Stage One does not give any indication of the prize to be won by Guildford Borough Council of being able to keep a large portion of incremental business rate growth – which could go a long way towards bringing about the infrastructure improvements that we need in order to attract and retain businesses. There is, it seems, a virtuous circle which has been ignored in the ELA.

2.5.19. At 2.4.4 the Report refers to the Enterprise M3 (EM3) Strategy for Growth document (final document published April 2013). There are some clearly identified issues set out in the Introduction:
a. It is a high cost location for businesses and their employees (it is ranked 8th out of 48 localities in respect of cost base – based on research by Local Futures).
b. The growth of the labour force is not keeping pace with the potential growth of business, especially as there is significant out-commuting to London (the area is only ranked 39th out of 48 localities in respect of the growth of the labour force);
c. Although improvements to transport have improved accessibility to Heathrow, uncertainty over the longer term plans for London’s airports will inevitably impact on the investment and location decisions of businesses;
d. There are growing problems of unreliable transport connections by road and rail with increased congestion and journey times on some routes;
e. There is a need for essential investments in infrastructure and the built environment, to meet the needs of local businesses, adapt to climate change and create a low carbon economy;
f. The innovation infrastructure is stretched and would need to expand if growth ambitions were to be met – occupancy rates at Surrey Research Park are already 95%;
g. There is a shortage of larger (25 hectare plus) sites – only two across the Enterprise M3 area. This may prevent the relocation of major businesses and discourage sizeable inward investment projects;
h. In situ business growth is constrained for land and planning reasons. Some larger businesses have not always had close relationships with local public sector partners to help remove constraints to growth (including in situ expansion, tailored skills programmes and collaborations with research agencies);
i. Provision and take-up of reliable and high speed broadband has been a major issue reported by rural businesses in the Enterprise M3 area;
j. In aggregate terms there is not a problem with the stock of office and industrial floorspace, much of it high quality. Market demand has been weak but there are other factors determining demand including high rentals. Some of the vacant space should be considered for other uses to avoid surplus property having a detrimental impact on local services and market perceptions of the area.
2.5.20. Much more should have been made in the ELA of the aims and targets of EM3 and how the Local Plan could/should help to deliver strategic outcomes.

2.5.21. Much of the character of the Borough’s economy is left to Appendix B (p80). Of note in the highlights at 2.5 to 2.7 are:
   a. The assessment of job numbers and job creations are five years out of date (2002 to 2008). This refers to the 2009 Guildford Economic Study which is not even listed in Appendix C. The Evidence Base should be Up to Date and Integrated (NPPF)
   b. At 2.6.1 the Report refers to a local business survey conducted in 2008. This is, once again five years out of date and circumstances are fundamentally different now. The Evidence Base should be Up to Date and Integrated (NPPF).
   c. At 2.7 the Report refers to eighteen sites identified as strategic employment sites. These are listed in Appendix T (p150) and characterised in Appendix U (from p155). There is no attempt to consider any linkages between employment sites and, by and large, the information is superficial rather than strategic.

2.5.22. Further more detailed comments are included in APPENDIX 1 – EMPLOYMENT LAND ASSESSMENT.

http://www.guildford.gov.uk/localplanstrategy

Field Code Changed
Formatted: Font: Bold
Deleted: Appendix [1]
2.7. **Flood Risk Reduction Measures guidance (2010)**

http://www.guildford.gov.uk/CHttpHandler.ashx?id=7426&p=0

2.7.1. The report notes that, as a general principle, along the stretch of the River Wey that flows through the Town Centre, setting development back from the river will provide more space to accommodate water during a flood.
2.7.2. Industrial areas consisting of warehouses, workshops and storage uses have high consequences in terms of economic damages. These have been identified as high priority because redevelopment of these sites can provide a large reduction in the total property damages in Guildford Town Centre.

2.7.3. For example, Walnut Tree Close, highlighted as Area 3 in figure 2b, contains a number of industrial properties that have very high economic damages due to their use and floor area.

2.7.4. These points generally accord with The Guildford Society aspiration to open up the riverside and could also be incorporated within a regeneration of the Walnut Tree Close land as a new residential quarter, set back from the river bank away from the flood risk area and with semi-basement parking to act as potential water storage during a flood event.


2.8.1. The Guildford Society is very concerned that the GBCS is seriously flawed.

2.8.2. The original study was commissioned in 2009, well before the 2012 NPPF, and was subsequently amended to take account of NPPF, but fails to meet the standards of sustainability set out in NPPF (sections 18-219) when taken as a whole.

2.8.3. The problem is that it has failed to provide a means by which the long term assessment of Green Belt release could be achieved without:
   a. Being arbitrary (due to the designation of specific Zones and Parcels);
   b. Being unfair due to the differential treatment of the Urban Areas relative to the Villages;
   c. Being inaccurate in terms of its definition and assessment of ‘sustainability’ – which should have been named as ‘distance from facilities’; and
   d. Because it has ignored national designations of protected land (AONB, for example) in screening sites for suitability for development, treating them in the same way as other sites.

2.8.4. This approach has led to some odd outcomes and, unfortunately, in some highly polarised views of the Local Plan and process, where, instead of considering the full Evidence Base and...
Consultation, groups have already begun campaigning to protect one area or another.

2.8.5. A landscape and visual appraisal should have been prepared of each parcel in accordance with the current best practice guidelines (as set out in the Landscape institute and Institute of Environmental Management and Assessment’s *Guidelines for Landscape and Visual impact Assessment (Third Edition)* (‘GLVIA’)) and, in particular the guidance produced by the Countryside Agency and Scottish Natural Heritage – *Topic Paper 6: Techniques and Criteria for Judging Capacity and Sensitivity*, whereby:

a. Landscape Sensitivity =
   Landscape Character Sensitivity + Visual Sensitivity
   AND
b. Landscape Capacity =
   Landscape Sensitivity + Landscape Value

2.8.6. NPPF states that key characteristics of the Green Belt are ‘their openness and their permanence’ (NPPF 79)

2.8.7. NPPF further states that, when choosing Green Belt boundaries, ‘local authorities should define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.’ (NPPF 85)

2.8.8. Failure to address this aspect of Green Belt land has led to wholly unsuitable sites being designated Potential Development Areas (‘PDA’), afforded similar status in the GBCS to any other PDA.

2.8.9. Equally, the lack of strategic assessment and the way Pegasus have chosen to compartmentalise land around the outside of the Guildford Urban Area have resulted in some perverse outcomes which rule out some potential development areas for one-time defensible Green Belt boundary revisions and even coalescence in order to avoid major incursions into (or even nibbling at the edges of) the Green Belt elsewhere.

2.8.10. Another **perverse and unsustainable part of the Pegasus approach and methodology** is demonstrated by the following oxymoron (noting NPPF 85):

a. A parcel that is categorised as scoring below 3 (using the Pegasus methodology) is described as a PDA, and is removed from the Green Belt;

b. Using the same methodology for the next Local Plan process, adjacent sites may well score below 3 and would, therefore, equally be treated as PDAs and potentially removed from the Green Belt; and yet
c. The NPPF 85 rule requires new Green Belt boundaries to be “likely to be permanent”.

d. It follows, therefore, that the Pegasus methodology is flawed.

2.8.11. It is clear that AONB should not have a blanket ban against development – assessment of appropriate housing should be considered (for example to meet the needs of villages within the AONB under extremely exceptional circumstances). It seems counterintuitive, therefore, that GBCS has excluded AONB villages but has not afforded equal protection to AONB adjoining the Guildford Urban Area.

2.8.12. We believe the Council’s interpretation of the Inspector’s Report in respect of Waverley Borough Council’s Core Strategy Document is flawed (the Inspector’s Report and Interpretation from Carol Humphrey are attached at APPENDIX 2A – Waverley Local plan Inspector’s Report). It is clear to us that the Waverley Inspector’s main thrust is that when identifying housing sites, local landscape designation should not be used as a logic for excluding some areas from consideration – an approach pursued by some in Waverley. The inspector advises that national designations have higher status than local designations and that special attention should be paid to national designations where policy is set out in the NPPF. This is to say that more weight should be given to the specific purposes of Green Belt and AONB designations than any local landscape designation such as Area of Great Landscape Value (“AGLV”) deployed by the Local Authority which itself should be reviewed as part of the Local Plan process. This interpretation is now reinforced by the Cherkley Court decision (attached at APPENDIX 2B – Mole Valley – Cherkley Decision (extracts)) which critiques Mole Valley’s failure to do any more than pay lip service to Green Belt and AONB purposes and policy.

2.8.13. It was, is and will remain legitimate and appropriate to afford a higher level of protection to sites in both Green Belt and AONB than to those which are not AONB. As such, we respectfully believe that the parcels in AONB should have been screened out before designating any sites as PDAs unless it was clear (by reference to the SHLAA and the Strategic Housing Market Assessment ‘SHMA’ which has not yet been published) that there would not be sufficient less sensitive land available for potential development to meet the needs identified in the Evidence Base such as occurred under very special circumstances (and on a
much smaller scale) at Tetbury in the Cotswolds [attached at APPENDIX 2C].

2.8.14. In Guildford Borough there seems from the evidence provided to date to be no pressing need to recommend redrawing the Green Belt boundary to exclude from the Green Belt major land parcels in an AONB. Clearly, therefore, the GBCS is flawed and needs to be revisited.

2.8.15. Also attached (at APPENDIX 2D – Letter from Rt. Hon. Nick Boles MP) is a copy of a letter of 7th October 2013 from Rt. Hon. Nick Boles MP to Rt. Hon. Anne Milton MP in respect of Green belt at Wonersh.

2.8.16. A full appraisal of the GBCS has been annexed to this document at APPENDIX 2 – GREEN BELT & COUNTRYSIDE.

2.9. Guildford Town Centre Development Study (2010)


2.9.1. This report, prepared by Cushman & Wakefield, has been based upon a number of older reports including a 2006 Town Centre Retail Study (prepared only three years after adoption of the substantially outdated 2003 Local plan).

2.9.2. The report identifies at Table 1 a summary of competing retail centres without identifying when the data was collected (although the text seems to suggest 2008).

<table>
<thead>
<tr>
<th>Table 1. Competing Centres Matrix</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Map Ref</strong></td>
</tr>
<tr>
<td>----------</td>
</tr>
<tr>
<td>1</td>
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<td>7</td>
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<tr>
<td>8</td>
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<tr>
<td>9</td>
</tr>
</tbody>
</table>

2.9.3. The figure of existing Town Centre floor space for Guildford at 120,112 sqm is at odds with the Valuation Office Agency list where the total area is closer to 170,000 sqm.

2.9.4. The major challenge with relying upon the Guildford Town Centre Development Study, 2010 (‘GTCDS’) is that it is a Demand-led approach where much of the Local Plan is to be based on Need (Objectively Assessed Need). This seems to be counterintuitive.
and fails to treat different categories of property development with equal weight.

2.9.5. Furthermore, the GTGDS is based on a Retail Study (see 2.20) where the Objective Assessment of Need is that of “overtrading” – an interesting concept which, in business terms, represents a danger to the business of selling more than the business can cope with, but in planning terms is used to indicate that trading performance is higher than a national average.

2.9.6. The logical outcome of the planning interpretation is that we would add more and more retail footprint until the national average has been reached – and, by definition, retailers will generate fewer profits in Guildford and be less inclined to have stores here.

2.9.7. It seems absurd as a planning concept in Guildford – which we hold up as an example of a special town which attracts retailers and shoppers alike – that our town should set as its Local Plan aims (albeit not specifically stated) to trend towards a national average.

2.9.8. The GTGDS should be dispensed with and a suitable replacement commissioned as part of a wider Town Centre Master Planning process, having regard to the differing pressures for land use, amenity space, infrastructure and resources that have been identified in more recently compiled parts of the Evidence Base and confirmed by analysis by Guildford Vision Group and The Guildford Society.

2.10. **Guildford Borough Preliminary Growth Scenarios**

*Transport Assessment Report (August 2013)*

[http://www.guildford.gov.uk/transport](http://www.guildford.gov.uk/transport)

2.10.1. This assessment seems to ‘jump the gun’ a little as it sets out scenarios which may be fundamentally different from those brought forward by the respondents to the Consultation.

2.10.2. Broadly, the responses to the Infrastructure baseline should be assessed prior to firming up any considerations of alternative transport models, and any potential game-changers should not be resisted simply because they were not part of this model.

2.11. **Guildford Town Centre Sustainable Energy Study (2007)**


2.11.1. The link provided in the Consultation document does not seem to work.

2.11.2. Energy efficiency and best practices have moved on substantially since this document was published and it should be updated or recommissioned to ensure that we are adopting the very best
technical and social solutions, the best economic modelling for infrastructure and developments, and achievable targets.

2.11.3. This part of the Evidence Base will need to be revisited regularly as technology progresses and as the system of taxing Greenhouse Gases and CO₂ evolves.

2.12. **Housing Needs Assessment (2013) (‘HNA’)**

http://www.guildford.gov.uk/shma

2.12.1. Prepared by SMSR Ltd of Hull by interviewing 1,012 residents of Guildford Borough in 2012.

2.12.2. Although this purported to be a survey process repeating an exercise from 2007, there was little if any sign of trend data from the two exercises that might help inform the housing need evidence for the purposes of establishing an “objective assessment of housing need” as required by NPPF.

2.12.3. The Guildford Society is adamant that the data should be analysed to indicate trends and then assessed for its impact on or influence on the interpretation of other data and reports. Equally, they should be assessed for statistical significance with a proper analysis of confidence intervals and margins for error.

2.12.4. Data differences between the HNA and the 2011 Census may be partly explained by the exclusion or inclusion of students respectively.

2.12.5. Of the 95 (9%) of respondents who were planning to move in the next 5 years (¶4.3), 20% said they would prefer to move elsewhere in the South East or to a neighbouring borough (¶4.3.4).

2.12.6. 104 new households were expected to be created from the sample of 1,012 (¶4.4) of which 31.1% were expected to be in Guildford Borough, with 24.3% in Greater London, 14.6% in a neighbouring borough and 11.7% elsewhere in the South East (¶4.4.6).

2.12.7. Of the 429 respondents who were in full time employment, 55.2% work in Guildford Borough, 24.0% in a neighbouring borough, 7.5% in Greater London and 7.2% elsewhere in the South East (¶4.5.3).

a. Among those 103 travelling to a neighbouring borough to work, 22.5% work in Hampshire, Basingstoke, Rushmoor or Aldershot.

b. This indicates that the SHMA should be carried out on a wider basis than just Waverley and Woking – it should include Rushmoor.

c. In the absence of information as to the commissioning of the SHMA, The Guildford Society is concerned that
2.13.  Habitat Regulations Assessment (HRA) Screening (2013)
http://www.guildford.gov.uk/hra

2.13.1.  Prepared by URS

2.13.2.  Whilst the report itself is somewhat technical and should inform the Local Plan and screen for potentially unsuitable policies, there are several noteworthy points which need to be taken into account when considering the CAPACITY of the Town and Borough to accommodate new development.

2.13.3.  The HRA notes (¶4.5) that Guildford Borough Council has identified seven potential alternative housing strategies [that] for consideration. These are set out in Table 5 – Guildford Housing Alternatives which shows Alternative Total housing to be delivered to 2031:

<table>
<thead>
<tr>
<th>Alternative</th>
<th>Total Housing</th>
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</thead>
<tbody>
<tr>
<td>a. Limited urban concentration</td>
<td>7517</td>
</tr>
<tr>
<td>b. Rural dispersal</td>
<td>8245</td>
</tr>
<tr>
<td>c. Limited hub and spoke</td>
<td>10027</td>
</tr>
<tr>
<td>d. Urban concentration</td>
<td>11851</td>
</tr>
<tr>
<td>e. Village concentration</td>
<td>13165</td>
</tr>
<tr>
<td>f. Hub and spoke</td>
<td>14361</td>
</tr>
<tr>
<td>g. Potential maximum capacity</td>
<td>21456</td>
</tr>
</tbody>
</table>

2.13.4.  These specific examples are not referenced to any part of the Evidence Base and The Guildford Society does not recognise these alternatives notwithstanding they are the figures used in the Pinwheels at Section Q9. Please make this clearer if the rationale for these numbers, is already in the Evidence Base or put the evidence into the Evidence Base if not.

2.13.5.  At (¶4.6) the report notes:

*Alternatives 1-5

The major housing sites would all lie within 5km of the Thames Basin Heaths. Distribution of approximately 2,000 new dwellings in the west of the Borough would create requirement for additional SANGS, primarily at Broadstreet and Backside Commons to accommodate the majority of this development. Additional SANG capacity would also be required in order to accommodate development in Guildford and nearby. These alternatives would be likely to require SANG at Stringer’s Common as development North East of Guildford appears to lie beyond the distance at which Broadstreet and Backside Commons would provide suitable SANG. Development at Tongham may be limited by the scope of available and potential SANG to cover this area.

Alternatives 6-7
As already stated, insufficient existing and potential SANGS capacity currently exists in order to facilitate these alternatives. Under Scenario 5 there would appear to be insufficient SANG distribution to deliver the proposed 2,200 new dwellings at Send Marsh. Under Scenario 6 the levels of development proposed at Guildford would appear to exceed SANG availability (both the existing capacity and the 207 ha potential capacity).

2.13.6. This is one of the rare insightful comments in the Evidence Base where some indication of capacity (and the measures that might be necessary to increase it) is actually dealt with explicitly and is welcomed even if the figures to which it applies are not adequately referenced.


http://www.guildford.gov.uk/localplanstrategy

2.14.1. We have reproduced at APPENDIX 3 – How Many Homes? a paper written for The Guildford Society Planning Group, which does not consider the direct effects on housing numbers of sustainability factors, infrastructure provision, local topology, Green Belt or the duty to cooperate. All these matters are very likely to reinforce the note’s conclusion.

2.14.2. The paper considers eleven options. They are set out in the paper’s Executive Summary and look at the future need for homes between 2011 and 2031:

a. Official CLG numbers
   - 14,071 homes (an average of 704 a year). This housing number is based on the government’s 2011 projections for household growth. This represents an increase of around 26% over twenty years above current (circa 54,000) households.
   - 8,300 to 9,480 homes (an average of between 415 and 474 a year). This housing number is based on the government’s 2010 projections for household growth.

b. Migration-trend based housing numbers
   - 11,820 to 13,480 homes (an average of between 591 and 674 a year). This housing number is based on a modified version of migration trends over the last five to ten years.
   - 3,620 to 4,520 homes (an average of 181 to 226 a year). This housing number is based on an assumption that only the same number of
people would move into Guildford borough as move out of the borough.

c. Jobs-led housing numbers

- **7,160 to 8,520 homes (an average of 358 to 426 a year).** This housing number is based on the calculation, by Experian in spring 2010, of the number of new jobs that are likely to be created in the borough.

- **11,440 to 13,100 homes (an average of 572 to 655 a year).** This housing number is based on the calculation, by the Institute of Employment Research (IER) in 2007, of the number of new jobs that are likely to be created in the borough.

- **9,280 to 10,800 homes (an average of 464 to 540 a year).** This housing number is based on an average of the Experian and IER data for the number of new jobs that are likely to be created in the borough.

d. Dwelling-led housing numbers

- **6,864 homes (an average of 312 a year).** This housing number is based on the number of homes that have actually been built in Guildford borough in the last 13 years.

- **7,084 homes (an average of 322 a year).** The draft South East Plan proposed a lower housing number for Guildford borough than the final version of the plan. This housing number is the same as the one in that draft plan.

- **21,320 homes (an average of 1,066 a year).** This housing number is based on a housing needs assessment model for meeting all of our existing and forecasted future need for affordable homes in the borough to 2031. **This would be an increase in our housing stock by about 40% in twenty years.**

- **14,168 homes (an average of 644 a year).** This housing number would meet about half of our existing and forecasted future need for affordable homes in the borough to 2031. The number is based on a model, which looks at how much supply and demand is balanced across the different tenures and property sizes.
2.14.3. Thus the projected numbers of homes needed in the future range
from 181 to 226 new homes a year (based on a hypothesis of zero
net migration) to 1,066 homes a year (meeting the entire SHMA
affordable homes need figure).

2.14.4. As a general comment (more detail is in the full report at
APPENDIX 3 – How Many Homes?) The Guildford Society judges
that the numbers produced by this analysis should be used with
much caution, especially if looking more than a few years ahead.

2.14.5. Option 4, 204 homes per year, the lowest option, would provide
for the natural growth of the Borough and a flux of equal numbers
of people in and out of the Borough. In addition to this most
people would probably support provision of more affordable
housing. Both could be accommodated within the 322 figure or
thereabouts. The natural growth would also provide a useful
addition to the active labour supply. One approach would be to
plan for natural growth and to target the number of years to
remove the affordable housing priority backlog of 2090.

2.14.6. Referring to the Issues and Options paper paragraph 9.16, the first
four boxes would give 3,302 + 160 + 269 + 2,004 = 5,735 homes,
287 new homes per year over 20 years. Using additional land in
the west would increase this to 8,287, 414 homes per year. It
would not be necessary to ‘Use countryside’ or ‘expand’ or ‘create
a new village’.

2.14.7. We conclude that a choice from the lower end of the range of
options is defensible and would limit the damage to the Borough.

2.14.8. One note of caution [where no specific allowance has been made
in the attached paper] is that there is no clear statement of a start
year for the historic backlog of provision (see section 2.4.1 above).
A clear strategy and statement needs to be made both as to how
these should be assessed, and as to how they should be
accommodated, perhaps by using one of the two recognised
approaches:

a. **Sedgefield Method** – meeting the backlog within the
next five years – there has been a shift towards the
Sedgefield method in appeal decisions since the
publication of the NPPF; or
b. **Liverpool Method** – meeting the backlog over the full
plan period.

2.14.9. In the absence of a current SHMA, it is not clear what the cross-
boundary issues are and whether those are likely to help or harm
this picture of the number of homes to be provided. The
**Guildford Society’s comments are, therefore, made with the
caveat that this needs to be comprehensively reviewed upon**
The publication of the SHMA and that the SHMA must be based upon the wider context (including authorities beyond the nearby Surrey County borders).

2.15. **Infrastructure Baseline (2013)**

http://www.guildford.gov.uk/infrastructureevidence

2.15.1. The Infrastructure Baseline Report (‘IB’) takes some account of transport and traffic issues facing Guildford and provision of facilities and services, utilities and amenities across the Borough.

2.15.2. In referring to the propensity of railway lines to sever communities, the IB should have also noted this effect from the rivers and major roads (such as the A3). It would be helpful to have each crossing of each such linear barrier listed along with access restrictions (if any) – such as weight, width or height restrictions for bridges. This would allow a user of the Evidence Base, and the IB in particular, to understand what limitations may exist (or improvements would need to be made) in order for a development to take place or for an urban or village extension to be properly linked to facilities and services.

2.15.3. Equally, in the IB, given the problems with the A3, it would be helpful to list each junction (including minor roads) within the Borough and the next junction beyond the Borough boundary with a clear description of capacity issues and directional limitations. This would allow a user of the Evidence Base, and the IB in particular, to understand what limitations may exist (or improvements would need to be made) in order for a development to take place or for an urban or village extension to ensure it could adequately access or cross junctions on the A3 and to avoid adverse impact on the A3 – which is already struggling to cope with volumes of traffic.

2.15.4. The IB (2.2.20) fails to note that there are also various areas such as Onslow Village, Ashenden and Dennisville that suffer from the major impact of on-street parking caused by inadequate parking facilities at the University and Hospital in particular. A large proportion of employment is in Onslow Ward and attention needs to be given to parking strategy for employees and students over and above the Park & Ride facility currently under construction. This will ensure that, as further growth is recommended to take place in or adjacent to Onslow Ward, this does not exacerbate an already troublesome problem.

2.15.5. The IB makes reference to the Evidence Base document ‘Surrey Future: Congestion Programme – SCC March 2013’ (‘Congestion Programme’). On the one hand, this fails to adequately cover the local context of the A3 and the gyratory system – which should
have been substantially expanded by the IB – and on the other hand, the Evidence Base itself ignores a lot of the wider area data and projections in the Congestion Programme (for example the ELA uses a different employment growth rate than is anticipated in Figure 2 of the Congestion Programme see below). It will be important for Guildford Borough Council (‘GBC’) to establish why some parts of extraneous evidence are suitable for use in the Evidence Base, whereas others are not. Failure to tackle this will leave the Local Plan Evidence Base open to challenge and will undermine the integrity of the Local Plan through the Inspector’s Inquiry and if adopted.

2.15.6. The Congestion Programme indicates that the A31 (Farnham Road), approaching and entering Guildford, and the A3 through Guildford are amongst those incurring highest costs due to congestion in the County; and by 2026 will include areas that are “severely over capacity”. Meanwhile, the Congestion Programme is not taking into account major anticipated urban extensions that will further exacerbate this congestion problem. The IB does not specifically highlight and seek to tackle these crippling shortcomings. It will be important to set out clearly the issues that the Local Plan must seek to tackle as well as forming a point-
2.15.7. A major shortcoming in the IB (referred to in 2.15.2 and 2.15.3 above) is the lack of inventory of the nature and quality (including any weight, width and height restrictions) of bridges and crossings over or under any of the linear infrastructure barriers (river, rail, A31 and A3) which impact on the tendency for such linear features to sever communities and settlements. Equally, there should be an audit of junctions (including capacity, functionality, etc.) for each connection between the A3 and A31 and the corresponding local roads. These are a minimum requirement to be able to understand the projected impact of any proposed new settlements, settlement extensions or change in employment land. Also lacking is an origins and destinations study to highlight whether any shortcoming is a local or regional issue, and to estimate the impact of new developments in the Borough and beyond.

2.15.8. The outcome (or progress) of joint Guildford Borough Council and Surrey County Council initiatives and studies should be included in the IB and the Evidence Base.

2.15.9. The IB does not consider the River Wey as part of the Infrastructure of the Borough and this omission may account for the limited references to it in the report. It is both part of a transport infrastructure (whether waterborne or using the towpaths) and also part of the leisure infrastructure of the Borough.

2.15.10. Section 2.4 (Buses) should include an audit of the various bus services that are provided across the Borough – the numbers of passengers, the hours of service, the frequency of services, the cost of the services. This section in particular needs to integrate with the Settlement Profiles Report (‘SPR’) so as to ensure that good data is available for all parts of the Local Plan process. The
SPR refers to bus services as poor or good but does not qualify such pejorative terms.

2.15.11. At 2.4.8 it is worth noting that the 2001 Census (quoted in SCC Congestion programme – 2013) gives 55% of Guildford’s labour force as resident locally; although probably now out-dated, this indicates the importance of Park & Ride facilities and bus services for providing for commuters from other parts of the Borough into the town centre (see below Table 4 from the Congestion Programme). A similar analysis should have been done to understand the movements of residents in the Borough between homes and workplaces for the purposes of the Evidence Base. This is to ensure that future infrastructure meets both current and future requirements and that extensions to settlements take full account of the likely destinations for employment – including provision for employees travelling from other neighbouring authority areas.

**Table 4 - Work locations of residents of Surrey boroughs and districts (2001)**

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<th>Area of employment</th>
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<th>ESC</th>
<th>CUF</th>
<th>MV</th>
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**Source:** Census 2001

2.15.12. The reference at 2.4.15 of the IB to providing bus facilities “elsewhere” represents a challenge for the infrastructure baseline which should probably be focussed more on the types and numbers of buses, the extent to which the bus interchange is a critical factor for bus users and what this tells us about where a replacement facility might be accommodated. It is, however, appropriate to identify the likely interim solution and to plan to ensure that, for potentially many months if not years, there is adequate capacity in the town centre road network to accommodate a different set of traffic flows than those seen today. This is to ensure there is no adverse impact on the town as
a result in the foreseeable (albeit temporary) event of an interim bus station solution.

2.15.13. Furthermore, in the bus section, there is no reference to the MVA Bus Station Study – October 2011 (or any more recent incarnation) ‘The MVA Study’ which should be included in the Evidence Base and should be referenced clearly in the IB. The MVA Study contains bus routes, numbers at peak hours, etc. and has at least informed the bidders for the North Street site and should be available for the strategic plan for the town and Borough.

2.15.14. The bus fleet (and the contracts negotiated by SCC with the bus operators) should be quickly migrated from dirty diesel buses with street-level exhausts to cleaner technologies. Failure to tackle this issue will lead to Guildford taking more of the older buses from other local authorities which are pushing for clean buses and impacting on Guildford’s air quality.

2.15.15. Section 4 – Green infrastructure – should include a section on the rivers and streams and canals in the Borough, and it may also be pertinent to include land in the ownership and/or stewardship of the National Trust within the Green Infrastructure, along with Areas of Outstanding Natural Beauty (‘AONB’). This would mean that key parts of the rural environment around villages and in between – including areas such as Pewley Downs, the Chantries, St Martha’s hill and the Hog’s Back – particularly the Areas of Outstanding Natural Beauty and Areas of Great Landscape Value should be included in the Green infrastructure section. This is particularly important since there is substantial pressure (reported in the Green Belt and Countryside Report (‘GBCS’)) to redraw the boundaries of the Green belt to enable urban extensions.

2.15.16. At Section 8.3 the document makes a notable omission in that the Lido is not mentioned, and neither are the sports facilities at Shalford Park. Furthermore, there are numerous recreation grounds and village greens around the Borough which should be referenced either in 8.3 or elsewhere in the document along with an up-to-date account of other community open space and community halls and allotments. These should then be cross-referenced in the SPR. Failure to record all such facilities and amenities will lead to a potential misstatement or manifest errors in the identification of potential development opportunities among scarce land resources.

2.15.17. It would be useful if there were more specific detail in the annexes of the stage each type of infrastructure (and its
component parts) has reached – including breaking points and pinch points that, by design and/or investment, could be resolved. For example, a traffic-light system could be employed to highlight:

2.15.17.a.1. Red – at or exceeding capacity
2.15.17.a.2. Amber – approaching capacity
2.15.17.a.3. Green – working well within capacity.

2.15.18. Looking at the provision of school places, for example, it would be reasonably straightforward to show the schools on a map with a traffic-light symbol so that, from first glance, it is possible to see where development would have to be limited or contributing to overcoming capacity limits.

2.15.19. A similar approach to roads and junctions would enable clear mapped identification of issues and capacity restrictions.
2.16. **Initial Sustainability Appraisal (August 2013) (‘SA’)**

http://www.guildford.gov.uk/localplansa

2.16.1. This was prepared by URS and comments were invited in a consultation on the Scoping Document over Christmas 2012/2013.

2.16.2. The SA sets out the same list of Options as at 2.13.3 and then ranks them according to certain criteria.

2.16.3. The SA comments that:

“Options D – G, which favour higher levels of housing growth, on balance, have the potential to perform more sustainably than those that propose lower levels of development.”

2.16.4. The Guildford Society would question the use of the term ‘sustainably’ in this context and also considers this SA finding in particular to be one-dimensional and should NOT be taken out of the context of a contribution towards an overall view rather than a direction to adopt it.

2.17. **Landscape (and townscape) Character Assessment (2007)**

http://www.guildford.gov.uk/landsapecharacterassessment


2.17.2. This document, on the basis it remains part of the Evidence Base, should have helped to inform both the Settlements Profile and the Green Belt & Countryside Reports, which would have been all the more robust for it.

2.17.3. For a proper assessment of the likely impacts upon settlements and neighbourhoods of the types and scale of developments suggested in the Consultation Document and associated Evidence Base, **this assessment needs to be re-commissioned and completed with a view to helping to develop suitable housing densities, infrastructure solutions and other site allocation strategies.**

2.18. **Local Housing Needs Surveys - Albury, Normandy, Pirbright, Ripley, Shackleford (and Peperharow), Send, Shalford, Shere, Worplesdon**

(for more information contact Guildford Borough Council’s Housing Development Manager).

2.18.1. It seems odd to have a Borough-wide consultation and to not make available all of the information collected — how relevant can an assessment of ‘How many new homes?’ be when some key data is withheld or selectively supplied?
2.18.2. In the absence of a current Strategic Housing Market Assessment ('SHMA') this should have been provided to help respondents to gain a full picture of housing need.

2.19. **PPG17 Open space, sport and recreation audit (2006)**

http://www.guildford.gov.uk/article/3965/Planning‐open‐space‐and‐green‐infrastructure

2.19.1. Prepared by the Council in February 2006

2.19.2. This report needs a complete reassessment in order to assist in both identifying suitable SANG space and to ensure that these uses are properly referred to in the SHAA, Settlement Profiles Report and GBCS.

2.19.3. In addition, a Needs audit should be prepared to identify what the impact might be of development in certain areas compared with others.

2.20. **Retail and Leisure Needs Study (2011)**

http://www.guildford.gov.uk/retailstudy


2.20.2. The fieldwork for this study was undertaken in late 2010

2.20.3. Tym notes "Since the original GRS was undertaken, there have been some very significant changes in both planning and the economy. These include:

- PPS4 and its practice guidance were published in December 2009;
- The Coalition Government has announced its intention to abolish regional strategies (including the South East Plan), which has a knock on effect in respect of the regional hierarchy of centres and requirements for housing and employment growth;
- The downturn in the economy, the resultant slow down of consumer expenditure growth and uncertain recovery timescales;
- The banking crisis, the associated lack of development finance and the viability challenges facing large town centre redevelopments;
- The continuing changes in consumer preferences, including the increase in of e-tailing and the polarisation of retailing (i.e. larger stores and centres are becoming more dominant)."

2.20.4. Tym also notes that they were “aware from the GRS that Guildford town centre is very popular and is the largest retail centre in Surrey. It also benefits from recent retail and leisure
developments, either in the pipeline, or recently completed. These included the following:

a. Planning permission has been granted for an extension to the Friary shopping centre including between 22,500sqm and almost 25,000 sqm (gross) of retail floorspace (the remainder being food and drink uses)

b. Bellerby Theatre and North Place Day Centre Planning Brief SPD (for mixed-use development including a supermarket)

c. Construction has commenced on the G-Live entertainment venue providing seminar rooms, café and a 1,700 capacity auditorium due to open in Autumn 2011

d. Guildford railway station is allocated in the Local Plan for mixed use including retail and leisure, whilst land at Bedford Road opposite the Odeon Cinema is allocated for one or a mix of uses that include retail.”

2.20.5. The Tym survey includes retail centre ranking dating to 2008 – five years ago and fully seven years in advance of the likely adoption date of the Local Plan.

2.20.6. Indeed, the key evidence base document relevant to this study was the existing Guildford Retail Study, June 2006. The majority of the survey work underpinning this document was undertaken in late 2005 and early 2006. Other evidence base documents that can be used to inform this update include:


c. Economic Development Study (2009)

d. Town Centre Development Study (2010)

2.20.7. The supply figures for retail were based on GOAD reports from October 2005. These were not substantially investigated by Tym.

2.20.8. Analysis of Valuation Office Agency figures for Retail property in the Town Centre shows around 171,231 square metres of existing retail stock against the 120,150 square metres in the GRS upon which Tym’s report was prepared.

2.20.9. Clearly this report needs updating – especially if, as we expect, work to bring forward the North Street development is to continue apace ahead of the Local Plan.

2.20.10. One major element of the Tym findings is the reliance on a measure of Overtrading. This may be a measure suitable for use by a developer to assess likely Demand for new retail development. It is wholly inappropriate to use it as a test for Need
for additional retail floor space in Guildford when there are so many other competing demands for land.

2.20.11. Overtrading can be a measure of both qualitative need, and quantitative in as far as it can be an indication of an imbalance between demand and supply of floor space in an area.

2.20.12. However, the term “overtrading” is still frequently misunderstood, and where existing services are claimed to be overtrading this should be backed up by corroborating evidence such as overcrowding and congestion rather than simply by comparison with retailers’ average turnover.

2.20.13. Having established the current turnover of existing centres/stores as accurately as possible, it is essential to be clear whether this represents a reasonable baseline for forecasting purposes. In other words, are existing facilities trading broadly in line with ‘acceptable’ levels, or is there evidence that facilities are underperforming or trading at such high levels that ‘overtrading’ is occurring.

2.20.14. There is insufficient data in the Tym report to indicate that the overtrading is resulting in such overcrowding that a major expansion of the retail offering in the town is required -- contrary to the Tym conclusion.

2.20.15. A new retail report needs to be commissioned (possibly in conjunction with the proposed developers of the North Street site) to establish the planning justification for large scale retail development when the Evidence Base points to employment and residential space being the most substantial Need to be met by the Local Plan.

2.21. **Settlement Hierarchy and Profiles (2013)**

http://www.guildford.gov.uk/settlementhierarchy

2.21.1. The Report was prepared by the Council

2.21.2. A commentary on the report is at APPENDIX 4 – SETTLEMENT PROFILE REPORT COMMENTS

2.21.3. There are some contradictions and some ‘cut-and-paste’ errors that should have been screened out before publication. These may hide some flawed reported data if information has been copied wholesale from one settlement but not completely amended for its destination settlement.

2.21.4. The Guildford Society is particularly concerned about the treatment of the Guildford Urban Area:

2.21.5. The Guildford Urban Area contains a population of more than half of the Borough (all of whom have no Town or Parish Council), and given its size and complexity it has a remarkably short entry in the SRP. There are so many parts of the Guildford Urban Area.
whose characters and backgrounds are fundamentally different (as are their issues) and whose facilities and access vary considerably. Failure to properly record these distinct neighbourhoods as settlements distorts the SPR and risks understating the importance for and to each neighbourhood of any nearby urban extension.

2.21.6. No reference is made to the Neighbourhood Area of Burpham, and it might be reasonable to expect that other areas might choose to go down the same neighbourhood planning path.

2.21.7. It seems clear, therefore, that this section should be broken up into the sub-districts which have their own nuclei of facilities and transportation issues. These should represent all of the areas not currently covered by Parish Councils and should probably include:

a. Town Centre
b. Guildford Park
c. Onslow Village (including Dennisville)
d. Park Barn
e. Rydes Hill
f. Woodbridge Hill
g. Stoughton
h. Stoke
i. Bellfields
j. Slyfield
k. Burpham
l. Merrow
m. Tyting
n. Charlotteville
o. Warwicks Bench
p. St Catherine’s
q. Specific character areas around the edge of the designated Town Centre such as Cranley Road, Markenfield Road, Guildford Park, Guildown, etc.

A thorough analysis of each area (and an assessment of the completeness and suitability of this list) should be carried out as a priority.

2.21.8. It is possible that a reassessment of the Landscape Character Assessment (see 2.17) may help towards completing this exercise but it is important that a similar approach to infrastructure, amenities and services is adopted for each of these areas so as to examine the impact upon any such area of development within or in close proximity to these areas.
2.21.9. The section on Character seems to be woefully inadequate. The Urban Area is dissected also by the River Wey and segmented by A-Roads (justification enough for defining Green Belt Areas in the GBCS) and the Railway; also poorly connected is the west side of Guildford (including a large proportion of employment and education).

2.21.10. Under Community services and facilities there is an orphaned "Northern".

2.21.11. Under Retail and Employment, much of this section should cross refer to the Guildford Economic Strategy Report 2013 and the IB. Missing from this settlement report is some indication of the employment levels and where employees typically live – for example, a separate report on Park Barn would highlight some issues with higher than average unemployment.

2.21.12. Under Transport, the settlement report refers to the River Wey as "a transportation route primarily for recreation and tourism purposes". This is omitted from the IB (see 2.15.9 above). Reference to the A3 should also highlight that it connects the town to the wider motorway network.

2.21.13. In sections 2.2.12-2.2.16 of the IB, there is no specific mention of the A320 junction at Stoke Crossroads (but there is reference to the general fragile state of the road network at peak hours). In the Settlement Report it is mentioned that “The Stoke crossroads and junction with the A3 are already at their capacity. A lack of investment in associated junctions will continue to have an adverse effect on the communities and major businesses operating in the Guildford urban area.” This analysis – whilst on the one hand differing in content and tone from the IB, fails to deal equally with each approach road to the town – all of which have specific and severe issues. The Farnham Road (A31) for example, has restrictions of weight and is often backed up along its entire length from the Hog’s Back. The A3 backs up from the A31 to the Burpham turn at evening rush hour, due in large part to volumes of traffic and a 60m climb over a relatively short distance between its bridge over the River Wey and the cutting in the Hog’s Back. This affects the businesses and quality of life and access for a large proportion of the settlement to the north and west.

2.21.14. In the Conclusion, there is the comment that Guildford “could support a level of development which exceeds that of any of the borough’s other settlements”. This may well be the case and there may be very difficult decisions to be taken about the future of the green belt boundary. These decisions should be
taken on the basis of a much more detailed settlement assessment having subdivided the area as described above. A decision, for example, to expand the town from the Warwicks Bench area would have to take account of a character assessment of that residential settlement, whereby it has no immediately local facilities and would necessitate a trip into the town centre – with no bus routes available for public transport. On the other hand, an extension to Burpham might have good access to local services and facilities and reasonable access to public transport.

2.21.15. There needs to be a comprehensive CAPACITY study for the Guildford Urban Area and each subsidiary settlement to show how the infrastructure (outlined in the IB) can be upgraded to accommodate growth since so much of the settlement’s infrastructure is already at or near (or even exceeding) its designed capacity. The IB is meant to be designed to identify capacity and limitations of infrastructure so as to inform both where development could and should take place AND what measures need to be addressed to accommodate such development.

2.21.16. In summary for the Guildford Urban Area, in any event, the focus of development should be town centre first – residential sites like the recently lost Bellerby site should be resisted for non-residential uses. Where any outward expansion of Guildford is required for a new settlement or a settlement extension, the revised green belt boundary should be drawn so as to represent a new permanent boundary. Such extensions should probably be planned with a critical mass to enable local services and facilities to be provided or where there are accessible services in existing settlements within easy access. As there is no Parish Council, it would be important to ensure that an adequate proportion of CIL goes to mitigate local effects of extension and to provide the necessary infrastructure within the local neighbourhood within the Guildford Urban Area.

2.22. **Sites of Nature Conservation Importance (SNCIs) (2004-2007)**


2.22.1. Prepared by the Council and based on the Guildford SNC project which began in February 1994 and ran to 1996, in which 4,236 Hectares of land were surveyed and 144 sites were recommended for selection.

2.22.2. Nine years ago, in 2004, the Surrey Wildlife Trust (SWT) agreed with the Council that ten years on from the start of the original
surveys, it would be desirable to begin a new programme of surveys in order to:
a. reassess the wildlife value of existing SNCIs,
b. check the appropriateness of site boundaries,
c. survey areas previously considered of marginal value but which may now be of sufficient wildlife value to warrant SNCI designation, and
d. survey sites which have not been surveyed in the past.

2.22.3. This document listed a number of sites for protection – including Merrow Lane Woodland and Wisley Airfield, Ash Green Meadows, and so on.

2.22.4. Prior to allocation of land in the Green Belt and Countryside, this exercise needs to be repeated to ensure the continuing protection where necessary and appropriate and to ensure compliance with and through the Evidence Base as a whole.

2.23. **Strategic Housing Land Availability Assessment (SHLAA) (2013)**

http://www.guildford.gov.uk/shlaa

2.23.1. The SHLAA was prepared by the Council during 2013 based on the situation as at December 2012.

2.23.2. There is no estimated target number of housing units to provide over the plan period (although on page 5 there is reference to “our interim housing number is currently 322 homes a year”).

2.23.3. Assuming the Borough-wide housing need of 322 units, this would suggest the required number of housing sites to find over the fifteen years of the Local Plan would be 4,830 homes. NPPF says that, for any five year period, Local Authorities must have identified their five year need plus 5% or 20% depending on their prior ability to satisfy housing need.

2.23.4. Figure one on page 9 shows that the number of housing units completed in 2008/9, 2009/10, 2010/11 and 2011/12 has remained resolutely below 250 units per year, suggesting that the 20% margin would apply to 5-year housing numbers.

2.23.5. There is a cumulative backlog, based on the target of 322 homes depending on the method of computation, in the region of 368 to 569 homes (see section 2.4.1).

2.23.6. Consequently, at any time during the plan period, Guildford Borough Council would need to have identified available and viable land for 1,932 dwellings for delivery within five years.

2.23.7. In addition, there would be a need to accommodate the backlog over the plan period or during the first five years depending upon the methodology acceptable to the Planning Inspectorate [see Section 2.14.8].
2.23.8. Assuming no allowance for backlog, therefore, over the plan period, this suggests that housing need is 4,830 homes (fifteen years at, 322 units plus a floating allocation of 65 units to cover NPPF obligations).

2.23.9. The SHLAA identifies land for 11,799 new homes (an increase by more than 20% over existing housing levels within fifteen years) and, having been published prior to the “How Many Homes?” document, made it very difficult for The Guildford Society and others to objectively assess the SHLAA prior to this Consultation.

2.23.10. The tables 1-6 set out the results of the assessments for Guildford Town Centre, Guildford Urban Area, Western Urban Area, Identified Village Settlements, Rural Exception Sites and Previously Developed Land in the Green Belt respectively.

2.23.11. The figures from tables 1-6 should have been sub-totalled and the shortfall identified so that:

<table>
<thead>
<tr>
<th>Period</th>
<th>Required (before shortfall)</th>
<th>Identified</th>
<th>Shortfall/(Surplus)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Years 1-5</td>
<td>1,675</td>
<td>631</td>
<td>1,044 = 209dpa</td>
</tr>
<tr>
<td>Years 6-10</td>
<td>1,610</td>
<td>1,096</td>
<td>514 = 103dpa</td>
</tr>
<tr>
<td>Years 11-15</td>
<td>1,610</td>
<td>1,896</td>
<td>(286) = (57dpa)</td>
</tr>
</tbody>
</table>

2.23.12. The next stage should be to assess how many housing units could be brought forward from later periods to meet some or all of the shortfall. Assuming the basis of the Report is sound and that all such units have been accelerated, there would be a need to find the additional dwellings either from Green Belt or Countryside beyond the Green Belt or from cross-boundary co-operation or some combination of both.

2.23.13. Table 7 identifies 724, 1,280 and 0 potential new homes for the three periods respectively from Land in the Countryside but Outside the Green Belt resulting in the following figures for Tables 1 to 7.

<table>
<thead>
<tr>
<th>Period</th>
<th>Required (before shortfall)</th>
<th>Identified</th>
<th>Shortfall/(Surplus)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Years 1-5</td>
<td>1,675</td>
<td>1,355</td>
<td>320 = 64 dpa</td>
</tr>
<tr>
<td>Years 6-10</td>
<td>1,610</td>
<td>2,376</td>
<td>(766) = (153 dpa)</td>
</tr>
</tbody>
</table>
2.23.14. If implemented, these housing units would still leave a nominal shortfall in Years 1-5 of 320 (64 dwellings per year), a nominal surplus in years 6-10 by 766 (153 dwellings per year surplus) and years 11-15 are unaffected with a surplus of 286 units.

2.23.15. Over the plan period, this suggests there would be 732 more homes than target created between years 1 and 15 (an overall total of 5,562 homes) without needing to redraw any green belt boundaries.

2.23.16. The main problem, however (assuming the 322 dwellings per year target is defensible), is that the five year supply from Years 1-5 is insufficient to meet the requirements set out in NPPF without using land in the Green Belt or reaching suitable cross-boundary agreements.

2.23.17. Table 8 then sets out the summary of assumed development on land assessed as suitable for housing that is currently in the Green Belt.

2.23.18. Table 8 shows Years 1-5 at 1,214 in the Green Belt as currently drawn (an oversupply of 894 units against the 322 homes target per year referred to above).

<table>
<thead>
<tr>
<th>Period</th>
<th>Required</th>
<th>Identified</th>
<th>Shortfall/(Surplus)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Years 1-5</td>
<td>1,675</td>
<td>2,569</td>
<td>(894) = (179 dpa)</td>
</tr>
<tr>
<td>Years 6-10</td>
<td>1,610</td>
<td>7,249</td>
<td>(5,639) = (1,124 dpa)</td>
</tr>
<tr>
<td>Years 11-15</td>
<td>1,610</td>
<td>2,011</td>
<td>(401) = (80 dpa)</td>
</tr>
</tbody>
</table>

2.23.19. At Years 6-10 table 8 suggests an additional 4,873 homes (on top of the surplus from tables 1-7), making a total surplus of 5,639 homes.

2.23.20. At Years 11-15 table 8 suggests 115 homes could be provided in the Green Belt, adding to the surplus of 286 from tables 1-7, totalling 401 homes above target level.

2.23.21. The SHLAA then provides a list of potential sites for development and an assessment of character and suitability. The Guildford
Society is not aiming to comment on each site at this stage but does wish to reserve its right to comment in greater detail once the Draft Local plan is presented for consultation.

2.23.22. The Guildford Society recognises that the inclusion of sites within this report does not imply planning would be granted and the SHLAA does not make that sufficiently clear.

Site Ref 46: Green Belt and Countryside Report land parcels C1 and C2

2.23.23. These sites were identified in the South East Regional Plan in 2009 as a target area for release of Green Belt Land, and the SHLAA suggests 300 homes towards the 1-5 year target (although it later describes this as “the possibility of some first phase completions occurring in the first five years”) and a further 1,331 homes in the 6-10 year window.

2.23.24. There are some manifest errors in assessing these sites including (but not limited to) the identified nearest cultural site having closed in 2009 and the nearest A road (presumably for connection to a main road) being the six-lane A3. For parcel C1 (Gosden Hill Farm) the walking routes seem to disregard the presence of woodland which was part of Merrow Common. The GBCS Report (Volume 2) notes for C1 that “Woodland to the south west of the land parcel between Merrow Lane and Gosden Hill Road is designated as an SNCI”. In what way is it appropriate to
consider a direct route as below for the purposes of calculating the ‘sustainability’ score? What should the score be in reality if the route were drawn to circumvent the Merrow Common woodland? [See also the Introduction to this response in which The Guildford Society requests greater care be exercised in the use of ‘Sustainability’ when what is meant in practice is ‘distance from facilities’]

2.23.25. Clearly some careful re-examination of the fact-based assessment needs to be done before these sites can be compared to others in the Evidence Base.

Site Ref 311 (part): Green Belt and Countryside Report land parcels H1 and H2

2.23.26. Given that the major impact of the development of these parcels would be on Onslow Ward, it seems peculiar that the ward boundaries are drawn so as to include these within Shalford Ward. There will no doubt be some serious questions here from local residents – most if not all of whom will live in the adjoining Onslow Ward and it is to be hoped that the Councillors for Onslow will work with their counterparts from Shalford to fully assess this possibility.
2.23.27. SHLAA suggests 300 homes would go towards the 1-5 year target (although it later describes this as "the possibility of some first phase completions occurring in the first five years") and a further 1,633 homes in the 6-10 year window.

2.23.28. Part of the site is in an Area of Outstanding Natural Beauty and Area of Great Landscape Value – this part should have been screened out of consideration before assessment within the GBCS (see earlier comments on GBCS).

2.23.29. Again there seem to be some manifest errors in the assessment of these parcels. For parcel H2 the walking routes seem to disregard the presence of woodland (Strawberry Grove and Manor Copse). The GBCS Report (Volume 2) notes for H2 that "Strawberry Grove and Manor Copse located to the east of the land parcel are designated as Ancient Woodland. This designation also applies to a tree belt which extends from the north of Strawberry Grove to the railway line". In what way is it appropriate to consider a direct route as below for the purposes of calculating the sustainability score? What should the score be in reality if the route were drawn to circumvent the Ancient Woodland? [See also the Introduction to this response in which The Guildford Society requests greater care be exercised in the use of 'Sustainability' when what is meant in practice is 'distance from facilities'.]

2.23.30. Furthermore, the walking route on the above example is between the centre of parcel H2 to the nearest town or district centre. The route shown goes to Guildford Town centre when Wood Street Village, Park Barn and Onslow Village all have district centres nearer than the Centre of Guildford (not to mention the University Campuses or Tesco at Ashenden). Perhaps this aberration is due to the failure of the Settlement Profile Report to consider the Guildford Urban Area as a collection of neighbourhoods around the Town Centre.

2.23.31. The other key element for consideration here is that this is land that was probably earmarked for future University and/or Research Park expansion and could be a critical component of economic growth for Guildford. It should not, necessarily be brought forward as a major housing site and should be comprehensively reviewed through the Local Plan process.

2.23.32. One additional important note for this particular site is that the Green Belt boundary after development will be somewhat less defined and defensible than the current boundary that Strawberry Grove provides.

Site Ref 2014: Green Belt and Countryside Report land parcels H8-A and H8-B
2.23.33. These parcels relate to land to the south and west of Fairlands, and should be taken in the context of Site Ref 311 (part) described above. These two areas taken together represent a substantial incursion into the Green Belt to the west of Guildford (see below in yellow) which, whilst they may be appropriate in isolation, should ask the question whether there is a likely future coalescence and whether there should be a more detailed study of the area (in the context of all of the other areas under scrutiny) to identify the merits or harm in extension of Guildford from Park Barn to Fairlands and Wood Street Village, together with suitable infrastructure and facilities to serve a new neighbourhood.

Site Ref 2014: Green Belt and Countryside Report land parcels H8 by reference to Site 311 (Parcels H1 and H2 referred to above)
2.23.34. In Volume III of the Green Belt and Countryside Report a further area is identified for removal from the Green Belt. If it is appropriate to consider extending Fairlands on parcels H8A and H8B, then why not consider a more ambitious expansion that could link better with facilities and transport routes by creating a critical mass and by planning on a larger scale including the areas coloured orange below:
2.23.35. The orange areas would amount to around 100 Hectares (or, say, 250 acres) and could provide in the region of, say, 1,500 homes. Links could be put in place between from the orange land (H8C and the southern section of H8) and Parcel H2, allowing the latter to be used predominantly for University and Research Park extensions – employment. This would suggest that a comprehensive urban expansion in this area could bring major benefits to the town.

2.23.36. It would be essential pre-requisite for any extension of the town to the West and/or North West to bring with it major infrastructure and environmental improvements.

2.23.37. These new neighbourhoods could link into the proposed new Park Barn Station (or, better still, some form of transit system linking the University, Hospital, Park & Ride, Guildford Business Park, the Cathedral and these new settlement areas to each other and to the town – see sketch below).

2.23.38. The overriding thinking behind this is that, IF a major realignment of the Green Belt is required, it should be defensible and should accommodate sustainable development. A transportation system (working for hours to support both the daytime and night time economies) would mean that commuting to, from and between employment areas would be easier and it would also support hospital visiting and reduce the burden on the roads.

2.23.39. It is important to note that The Guildford Society is advocating neither realignment of the Green Belt nor development in this area per se, but that with any such development there must be ambitious and sustainable infrastructure that negates the harm done to the area by development. The Guildford Society recognises that the SHLAA is simply looking at potential alternatives and, as such, all opportunities should be considered.
2.23.40. Missing from the SHLAA (due to the way the land was scored in the GBCS) is the potential to redraw the Guildford Urban Area Boundary around the north side of Jacobs Well. This is not necessarily a recommendation for implementation but seems to be a perfectly logical possible alternative to expansion in other areas which should be considered within the same exercise.

2.23.41. A new Urban Area Boundary could be defensible and the increase in housing in close proximity to where jobs are located and where intensification of employment uses is considered in the ELA seems to accord with the requirements of sustainability – notwithstanding that it requires the swallowing up of an existing settlement into Guildford Urban Area.

2.23.42. Parts of Parcel B3 and Parcel B2 could be excluded from Green Belt and developed in such a way that the area could have stronger transportation links to Guildford – ensuring that the area as a business area and residential quarter is less reliant upon car travel and that journey times are more predictable.

2.23.43. In the plan below (introduced as an example and for discussion rather than as a proposal) the yellow area is Site Ref 245 in the SHLAA. The orange areas are currently not included as potential sites for development in the Green Belt.
2.23.44. The plan highlights that there may be potential for a Park & Ride on the topographically lower part of the site with access to and from the A3 at Burpham (catering for Guildford-bound traffic from the A3 north) with connections between Slyfield and Clay Lane and a potential Park & Ride bus route joining the A320 close to its junction with the A3. This assumes that the scale of development would be on such a scale as to enable the provision of infrastructure and services in this way. There would also need to be a green buffer along the river for both flood protection and environmental reasons.

2.23.45. The Guildford Society reiterates that this has been included as a means of identifying alternative places and ways to amend the Green Belt boundary, IF the case is made to require any realignment in the first place, to enable development that can be made to be sustainable, deliverable and to ensure future defensible boundaries.

2.23.46. Broadly, development of this kind may be able to accommodate an additional 1,000 to 1,500 homes and some additional employment areas to meet or go towards the needs identified in the ELA. This could perhaps be achieved earlier than the 11-15 year timescale suggested in the SHLAA for Site 245.

2.23.47. Placing a Park & Ride that could be accessible from both the Woking Road (A320) and the A3 would mean that the existing Park & Ride at Spectrum could be used in due course for another purpose – potentially for housing development.

2.23.48. Furthermore, this might be a more appropriate once-and-for-all redrawing of the Green belt Boundary than carving out the area
of A4 (Whitmoor Common) and A1 (Stringers Common) — highlighted in Question 28.

2.23.49. It is important to note that The Guildford Society is advocating neither realignment of the Green Belt nor development in this area per se, but that with any such development there must be ambitious and sustainable infrastructure that negates the harm done to the area by development. The Guildford Society recognises that the SHLAA is simply looking at potential alternatives and, as such, all opportunities should be considered.

2.23.50. In general, therefore, The Guildford Society believes that the SHLAA has not considered all options and has relied on some of the flawed outcomes of the GBCS.

2.23.51. The SHLAA should help to guide a long term vision of the various different parts of the town and Borough, and yet there is no real attention given to the separate and distinct neighbourhoods within the overall Settlement of Guildford Urban Area — in which respect the Settlements Profile Report (‘SPR’) is manifestly deficient.

2.23.52. In the ELA, there is not enough granular detail as to where employment might be provided, or what mixes are supposed, when considering residential use of part or all of existing or potential employment land.

2.23.53. In the IB, there is a clear concern about the traffic congestion in the town centre and this should be addressed in the SHLAA, even if to note that prior to any major development, a detailed assessment must be undertaken to avoid the preclusion of a long term solution to traffic or transportation deficiencies.


[http://www.guildford.gov.uk/shma](http://www.guildford.gov.uk/shma)


2.24.2. Based on West Surrey Housing Area
   a. Guildford Borough
   b. Waverley Borough
   c. Woking Borough
2.24.3. The market area seems to be incomplete for the context of this Consultation, given the emphasis placed upon development of land at and around Ash South and Tongham and also given that 32% of employees in Guildford come in from Boroughs other than those in Surrey – presumably a number from Rushmoor given public transport links and proximity.

2.24.4. It must be a nonsense to conclude that the Strategic Housing Market Area for Guildford should be confined to Borough Boundaries (not least those of Guildford, Waverley and Woking), and it must also be taken into consideration whether the fact that both Rushmoor and Woking have settled Local Plans without expressly accommodating part of Guildford’s housing Need means that Guildford is unreasonably, irrationally and impracticably constrained and, therefore, obliged to meet its housing needs (together potentially with some of Waverley’s identified shortfall) within Guildford Borough boundaries.

2.25. Strategic Flood Risk Assessment SFRA (2009)

http://www.guildford.gov.uk/article/3968/Strategic-Flood-Risk-Assessment


2.25.2. The report notes that “with regard to surface water flooding, a large proportion of the study area is currently undeveloped and so in those areas the surface water is unchanged from Greenfield rates. The most intensive urbanised areas are within Guildford and Ash; here any further development could potentially increase..."
surface water. Sewer flooding is known to occur within the Borough of Guildford."

http://www.guildford.gov.uk/localplansascoping

2.26.1. The Scoping report was prepared for consultation by URS.
2.26.2. The link (above) reproduced from the Consultation document does not function

2.26.3. The Guildford Society responded to the Consultation on the Sustainability Appraisal Scoping Report on 16th January 2013 (sent by Martin Taplin to Tanya Mankoo-Flatt) – a copy of which is attached at APPENDIX 5 – RESPONSE TO SA SCOPING REPORT

2.27.  **Thames Basin Heaths Special Protection Area Avoidance Strategy 2009-2014 (2010)**
http://www.guildford.gov.uk/CHttpHandler.ashx?id=11294&p=0

2.27.1. This document was prepared by the Council and aimed to run from 2009 to 2014. It will have expired by the time the Local Plan is ready for submission to the Inspector, and steps should be taken to either consult on its replacement or to consider whether it remains fit for purpose in the context of the Local Plan.

2.27.2. There is a case to be made that the designation of SPAs and SANGs leads to a prescription of use of those sites for development that are neither SPA nor SANG and that this document threatens to reduce the impact public consultation can have on outcomes.

2.27.3. Care therefore needs to be taken to ensure that the Council is able to determine suitable uses for sites and even, possibly, that the allocation of existing SANG land could potentially be reversed if there is a better case for developing that land rather than other Green Belt and Countryside land.

2.28.  **Town centre vitality and viability report (2011)**
http://www.guildford.gov.uk/towncentrevitalityandviabilityreport

2.28.1. This report prepared by the Council from a 2008 baseline shows a rosy picture of the retail market in Guildford although there are currently more vacant shops in the Prime retail area than at the time of the report.

2.28.2. This report should be updated ahead of establishment of site strategies in the Local Plan.

2.29.  **Traveller Accommodation Assessment (2012)**
http://www.guildford.gov.uk/taa
2.29.1. **Clearly the Borough needs to find suitable sites for Travellers and**

The Guildford Society’s response to the consultation earlier in 2013 should go towards the formation of draft policies in this area.

2.30. **Other Evidence**

2.30.1. The Evidence Base should include existing Development Briefs, SPDs and SPGs, the list of Listed Buildings (including those assessed as being ‘at risk’, the list of Ancient Monuments, the list of Conservation Areas, SSSIs, and other specific designations of land and buildings in the Town and Borough.
CONSULTATION QUESTION 3 – BASIS OF VISION

Q3. Basis of Vision for Guildford Borough:

3.1. The Issues and Options Consultation, rather than starting with a blank canvas has set out suggested components of the Vision as follows:

3.1.1. Economic objectives
   a. Recognise and support innovation and our contribution as a world leader in higher education,
   b. Health, high technology and knowledge-based industries
   c. Provide excellent broadband communications as standard in all new developments
   d. Provide for and support economic growth in environmentally sustainable and accessible locations
   e. Support and expand the diversity of our business base
   f. Support and expand the economic vitality of our rural areas
   g. Keep and enhance the vitality and viability of our town, district and local shopping centres, with Guildford remaining a quality town with a vibrant, cosmopolitan town centre

3.1.2. Environmental objectives
   a. Require new developments to be of the highest quality design, have a positive relationship with their surroundings and contribute towards making environmentally sustainable places
   b. Where appropriate require new developments to take account of the historic environment so that they contribute to protecting and enhancing our heritage
   c. Protect, maintain and enhance our valued landscapes, green spaces and habitats within and around our urban areas and villages, particularly where of European or national significance
   d. Enhance the connectivity of our urban areas, open spaces and wildlife habitats
   e. Require high levels of sustainable construction including incorporating energy efficiency measures
3.1.3. Society objectives

a. Provide a choice of homes to meet the identified needs of our communities and to support long term economic growth

b. Support communities in developing their neighbourhood plans

c. Maxise the efficient use of our existing infrastructure and secure extra infrastructure that we need to support new development

d. Provide a vibrant culture with theatres, venues and restaurants, with a choice of leisure, cultural and sporting facilities for everyone

e. Support Guildford’s role as a thriving student town
   Support cohesive neighbourhoods, encourage social enterprise and volunteering, and maintain viable community facilities

f. Help to reduce relative disparities in health and education attainment

g. Achieve a transport system balanced in favour of sustainable transport modes to give people a real choice about how they travel and which restrains the growth of vehicular traffic and congestion whilst supporting the improvement of walking and cycling facilities

h. Provide good access to open spaces and the countryside from our urban areas and villages

It is the view of The Guildford Society that this section of the Consultation sets out a vision, not for Guildford, nor for the Borough, but for the Local Plan itself.

Guildford Town and Borough needs to have a clear set of objectives around which a Vision for Guildford and for the Borough can be formulated.

Furthermore, the elements of the ‘Vision’ are not all carried through into the specific sections of questions in the main Consultation, making it difficult for respondents to know quite what questions demand what responses.

The Guildford Society contends that a VISION is about

3.5.1. ‘visualising’ what we want to hand on to future generations as a result of the planning framework and decisions we make in this Local Plan process…

The Local Plan is about

f. Minimise local carbon emissions, maintain good air quality and promote sustainable management of our waste
3.6.1. delivering that VISION within the regulatory framework and legislation.

3.7. The Guildford Society applauds and endorses the Guildford Vision Group ‘Vision’ document appended as part of the response to Question 12, and it urges the Council to work towards a more holistic and far-reaching Vision for Guildford that will ensure that this Local Plan forms the starting point for a new era of responsible yet effective development to deliver environmental, societal and economic advances for Guildford’s Town and Borough.

3.8. In terms of the components of Vision offered, there should also be reference to the:

3.8.1. Provision of excellent transport infrastructure so as to enable economic progress;

3.8.2. The protection, maintenance and enhancement of our valued historic civic heritage: The High Street, Listed Buildings and Conservation Areas; and

3.8.3. The encouragement of use of low-emission vehicles (including buses) – NB: there is a bias against cars in the Consultation document which is misdirected; the drive should be towards more efficient cars which use less fuel and emit less CO₂. It is noteworthy that Guildford town centre has no charging points for electric vehicles, falling well short of competing towns and cities.
CONSULTATION QUESTION 4 – HOUSING DENSITY

Q4. Approach to New Housing

4.1. The Issues and Options Consultation Document sets out a series of 'Options':

4.1.1. The right mix and density of homes
   a. When planning new homes we could set a specific mix and density of homes for the different areas within the borough
   b. We could generally seek lower or similar densities than we do now and so use more land to deliver the development we need
   c. We could seek higher densities and use less land
   d. We could take a more flexible approach and assess each site on a case by case basis having regard to the character of the surrounding area and the sustainability of the location

4.2. These options seem to be an unsophisticated way to try to gain a view from the respondents as to whether they are generically more or less resistant to residential sprawl versus packing housing tighter together.

4.3. Overall, this is a very broad question which requires more consideration than the limited options proposed by the authors.

4.4. In responding to this question, an overriding assumption of “good design principles” is made. This broadly should be taken to include attributes such as the following:

4.4.1. Character - a place with its own identity but that sits well in its context
4.4.2. Continuity and enclosure - where public and private spaces are clearly distinguished
4.4.3. Quality of the public realm - a place with attractive and well-used outdoor areas
4.4.4. Ease of movement - a place that is easy to get to and move through
4.4.5. Legibility - a place that is easy to navigate
4.4.6. Adaptability - a place that can change easily
4.4.7. Diversity - a place with variety and choice
4.5. On the basis that design is good, the principal concern is to ensure the built environment in any area (urban or rural settlements) respects both its context and its heritage.

4.6. There are clearly areas of our Town and Borough that can accommodate a higher density of development than others.

4.7. The Settlement Profiles Report should split the Guildford Urban Area (GUA) into its various neighbourhoods and districts as each such area has its own issues, concerns, characteristics and opportunities.

4.8. Each Settlement (and Neighbourhood) should be reported with the following data:
   4.8.1. Area
   4.8.2. Population
   4.8.3. Number of Dwellings
   4.8.4. Typical Density (or densities where there is more than one character area within the settlement) and
   4.8.5. Where Available, an indication of the typical number of storeys and/or bulk and massing of existing buildings

   Please refer also to Section 2.21.7

4.9. Each Settlement (and Neighbourhood) should be encouraged to develop a Character Statement to enable new development to protect and enhance those characteristics in each area.

4.10. In the absence of a Town Centre Master Plan, it will be necessary to assess the different parts of the Town Centre for their suitability to accommodate development (including building heights, bulk and massing) to establish an effective Design Code for Development in the Town Centre.

4.10.1. For example, there may be potential for an increased density around the Station and Walnut Tree Close to allow for a major development of housing in place of the existing commercial uses (see our comments at Section 2.7.3).

4.11. Once this background evidence is available, it would seem most appropriate to establish a specific mix and density of homes for the different areas of the Borough to meet the characteristics of each respective area. This would go a long way towards establishing a clear basis for the quantification and allocation of housing land supply, ensuring a more robust SHLAA, and can be efficiently and effectively managed upon adoption of the Local Plan.

4.12. This must surely be a pre-requisite to earmarking and allocating swathes of Green Belt and Countryside.

4.13. This should enable a clear understanding of the CAPACITY of the various Settlements (and Neighbourhoods) to cope with Locally-Sustainable growth in housing.
In short, there should be no blanket density recommendations (such as 40 dph) because some sites will easily be able to achieve more and some less.

The Guildford Society is keen to highlight that inappropriately high density that harms character is not acceptable regardless of distance from a station or bus stop. It is highly unlikely that any development that exceeds four or five storeys could be acceptable in any part of Guildford as key views into and from the town and the town’s roofscapes are fundamental aspects of the character of our gap town.

Lower densities of twenty to thirty dwellings per hectare may be necessary and appropriate to maintain character in some parts of our garden suburbs and villages, whereas thirty to forty dwellings per hectare will often be an appropriate range, with building heights confined to two to three storeys.
CONSULTATION QUESTION 5 – AFFORDABLE HOUSING (1)

Q5. Threshold for Providing Affordable Housing:

5.1. The Issues and Options Consultation document sets out three options for affordable housing:

5.1.1. The site size threshold for providing affordable homes

a. Reduce the threshold for the provision of affordable homes as part of a development scheme to five homes (gross)
b. Have no policy threshold, so all new housing developments would contribute
c. Where on site provision is impractical, we could take a financial contribution instead to allow us to provide affordable homes elsewhere in the borough

5.1.2. These are by no means the only ways of considering Affordable Housing provision and comments should also have been requested to what ‘Affordable’ housing should cover – including Assisted Living, Shared Equity Housing and Social Housing to name but three.

5.2. The major housing challenge for Guildford Borough is to tackle the question of ‘Affordability’ in a way that does not stigmatise or create ghettos of those in ‘Social Housing’, and that recognises that affordability is not merely a function of welfare. It must seek to accommodate and include key workers, young people who cannot find their first home, the disabled and infirm, and, increasingly, as the Pensions crisis leaves more pensioners with less to live on, older people.

5.3. A clear understanding of what the Local Plan (and Guildford Borough Council) mean by “Affordable Housing” is essential, therefore, in setting policy in this area.

5.4. It is also vital to understand that the interaction between Community Infrastructure Levy (‘CIL’) and quotas for “Affordable Homes”, along with the need “to build developments with the highest quality design” could render some developments undeliverable.

5.5. With the National Planning Policy Framework (‘NPPF’) requiring housing targets to be met, a presumption in favour of (sustainable) development and a succession of planning appeals identifying that a failure to provide sufficient housing to meet five-year supply, it is imperative that sites identified for housing development can and will be brought forward within
5.6. Perhaps it would be possible as part of CIL to set a tariff per unit of housing which would go towards off-site affordable housing to the extent that the provision cannot be met on site.

5.7. The Council should set a threshold level of 15 units whereby at or above that level the provision must be met on site, whereas with fewer than 15 units this could be by way of financial contribution.

5.8. The allocation of affordable housing should be made on the basis of floor area rather than number of units which would allow for a purer division of value/cost and would also enable larger affordable housing units to be constructed to meet need where necessary or a greater number of smaller units if need so demanded. It may be that a professional analysis of the proportion of affordable floor area that could be provided whilst maintaining viability will be required in order to set an objective percentage as the basis of Policy.

5.9. This would enable a formulaic calculation of contribution to affordable housing which all residential development could be required to meet. Any funds raised by way of financial contribution could go towards either the direct provision of affordable housing or may even go into an equity fund to enable shared equity schemes to help young people onto the housing ladder.

5.10. In the context of the Options provided, a combination of 5.1.1.b and 5.1.1.c would seem to be appropriate but having regard to a robust approach to assessing scheme viability and concessions, where required, to enable high quality developments to be delivered without major compromise to meet institutionalised targets.
Q6. Proportion of Affordable Housing

6.1. The Issues and Options Consultation sets out two sets of options for consideration:

6.1.1. The proportion of affordable homes to provide in qualifying developments
   a. Increase the proportion of homes that we require developers to provide as affordable housing to 40 per cent
   b. Keep the proportion of homes we require developers to provide as affordable housing as 35 per cent

6.1.2. Developments that should contribute to providing affordable homes
   a. In addition to market housing developments we could require developments of other types of housing such as off-campus purpose-built student housing and care homes to provide a proportion of affordable homes

6.2. The Consultation Document refers to Guildford Borough Council having “gathered information on the viability of housing developments providing affordable housing” which notes that “most of the borough has very high property and land values and most new developments are potentially able to support a requirement for affordable housing of 40 per cent of all homes provided.”

6.2.1. There is no specific reference to the part of the Evidence Base that this refers to and the Local Plan will also set a level for Community Infrastructure Levy (‘CIL’) which may very well (and, indeed, should) change the economics of development.

6.2.2. No illustration has been given as to how these two ‘taxes’ on development (Affordable Housing provision and CIL) will impact on the economics of development.

6.3. In addition to The Guildford Society’s response to Question 5 above, it is worth setting out the basis of valuation of development and land, where the model looks a little like this:

\[
\text{SITE VALUE (or Cost to Purchase)} \\
\text{plus}
\]
PLANNING COSTS
plus
CIL and s106 & s278 OBLIGATIONS
plus
CONSTRUCTION COSTS (which vary according to whether the development is being executed to Code 3, Code 4 or Code 5 in terms of Sustainability)
plus
FINANCE & MARKETING COSTS
plus
PROFIT (typically a percentage of total cost)
equals
TOTAL SALES PROCEEDS
made up of:
AFFORDABLE HOUSING (usually at or lower than Cost)
PRIVATE SALES (or LETTING)

6.4. The main issues arising from this model are that, within reason, the only substantially variable component in the model is LAND.
6.4.1. If already acquired, an economically non-viable development will probably not be commenced;
6.4.2. Prior to acquisition, a seller may not accept the price a developer is prepared to offer for the Land where the costs of development substantially depress land values.

6.5. Clearly a robust viability test should be established to ensure development actually proceeds but where developers are not able to dodge their social responsibilities to help provide homes for those who cannot afford housing in the private markets.

6.6. Although Student Accommodation and Care Homes may well be considered to be affordable housing (especially the latter where the Local Authority is paying for a large proportion of the fees) separate assessment should be made to understand whether any particular development can afford to or should make an allocation for affordable housing.

6.7. GBC should consider introducing an affordable housing provision based upon a percentage of floor area rather than number of units – otherwise, a developer building a close of seven executive homes of 5,000 sqft each could decide to construct three 600 sqft ‘affordable’ apartments (totalling 1,800 sqft between them) in a corner of the site, whereas by reference to the total development of 35,000 sqft, a contribution of, say, 10,000 sqft might seem more appropriate (please also see Section 5.8 above).

6.8. GBC may also consider setting a different level of tariff for different Settlements (and Neighbourhoods);

6.9. For any development in the Green Belt or Countryside the tariff (and CIL) should be set at a high enough level to ensure both that it is not an overly
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6.10. Repeating the point made in response to Q5 above due to the similarities in the questions:

6.11. Perhaps it would be possible as part of CIL to set a tariff per unit of housing which would go towards off-site affordable housing to the extent that the provision cannot be met on site.

6.12. The Council should set a threshold level of 15 units whereby at or above that level the provision must be met on site, whereas with fewer than 15 units this would be by way of financial contribution (please also see Section 5.7 above).

6.13. The allocation of affordable housing should be made on the basis of floor area rather than number of units which would allow for a purer division of value/cost and would also enable larger affordable housing units to be constructed to meet need where necessary or a greater number of smaller units if need so demanded.

6.14. This would enable a formulaic calculation of contribution to affordable housing which all residential development could be required to meet. Any funds raised by way of financial contribution could go towards either the direct provision of affordable housing or may even go into an equity fund to enable shared equity schemes to help young people onto the housing ladder.
Q7. Rural Exception Housing

7.1. The Issues and Options Consultation sets out a series of Options for consideration:

7.1.1. Rural exception housing

a. Introduce greater flexibility in the size and location of rural exception sites making sure that rural exception housing schemes relate well in size to the nearest community

b. Include wording in a policy on rural exception housing relating to the price paid for land for rural exception housing

c. We could allow for limited market housing to be provided on rural exception sites provided that the overall amount of affordable housing provided is increased

7.2. A policy for each Settlement would seem sensible and by adopting differential CIL rates (see response to Q6 above) or Affordable Housing quotas (or both) in each Settlement and for the Green Belt, this should ensure land values can be kept manageable and an appropriate mix of private and affordable housing could be achieved.
CONSULTATION QUESTION 8 – HOMES FOR TRAVELLERS

Q8. Homes for Travellers

8.1. The Issues and Options Consultation sets out a series of options for Travellers accommodation:

8.1.1. Homes for travellers

   a. Provide pitches/plots within towns and villages where sites are suitable, available and viable
   b. Provide rural exception sites for affordable accommodation for travellers in the Green Belt as an exception to Green Belt policy
   c. Provide sites on land classed as Countryside Beyond the Green Belt
   d. Provide pitches/plots on previously developed land in the countryside (including in the Green Belt)
   e. Where suitable, make permanent the existing temporary planning permissions for pitches/plots
   f. Encourage small scale private pitches in the countryside (including in the Green Belt)
   g. Provide new sites (primarily public pitches) in the countryside (including in Green Belt)
   h. Set a site size threshold and a proportion of traveller pitches/plots for large housing developments

8.2. The Guildford Society directs officers to its response to the Consultation on Homes for Travellers:

8.2.1. The analysis in the Evidence Base should include a ranking of suitability and take account of alternative uses for the land - where a site could be developed to a higher density to meet local housing need and/or higher buildings could be accommodated, these should be noted and should affect the suitability ranking.

8.2.2. Guildford Borough has scarce land resources and substantial competing demands. It is a vital part of the plan process to ensure the most efficient use of scarce resources - but this must not be at the expense of minority groups for whom alternatives will need to be found.
CONSULTATION QUESTION 9 – DIFFERING ACCOMMODATION

Q9. Differing Types of Accommodation

9.1. The Issues and Options Consultation sets out two series of Options:

9.1.1. Ageing population and vulnerable members of our community:
   a. Plan for more Lifetime Homes, suitable for disabled residents and capable of being adapted to meet the needs of residents as their life needs change over time
   b. Encourage the development of more retirement homes and specialist homes that help people to live independently, but have facilities or support available when they need them
   c. Encourage the development of retirement communities that comprise of different types of housing and care facilities in a single location
   d. Encourage the development of smaller homes in suitable locations for people who wish to ‘downsize’ from larger properties

9.1.2. Homes for students, low paid workers and young working people
   a. Plan for new purpose built student accommodation or flats either on or off relevant campuses
   b. Support appropriately designed new build or building conversions to houses in multiple occupations with the flexibility to meet the housing needs of students, low paid workers or young adults

9.2. The University should be encouraged to commission or develop or support the development of sufficient student accommodation within its campus (including, if appropriate, the redevelopment of some existing low-rise 1960’s blocks which could be built to a much higher density – as shown at Manor Farm) to meet the objectively-assessed needs of its students.

9.3. This would free up large numbers of houses currently in student occupation and, consequently, unavailable for local residents – often to the detriment of the character of the local area. This should be a priority BEFORE building on land in the Green Belt and Countryside.

9.4. GBC should identify in the Evidence Base the number of housing units currently let to students – the data should be available by establishing
how many properties are exempted from Council Tax due to student registrations.

9.5. GBC should, in future, avoid sites within an easy, relatively level walk into the town centre (such as G-Live and Bellerby) being lost to housing uses for those needing assistance – whether of advanced years, infirm or disabled – including former service men and women. Lessons from the past should show us just how beneficial a development such as Abbot’s Hospital is to the fabric and function of the town.

9.6. All of the options under 9.1.1 are considered useful, although provision of homes under 9.1.1.a would need to be implemented with care to avoid inefficiency.

9.7. The options under 9.1.2 should also include better use of land now used for surface car parks which should go underground or be in low-level multi-storey car parks.
CONSULTATION QUESTION 10 – EMPLOYMENT (TOURISM)

Q10. Employment and Jobs - Tourism

10.1. The Issues and Options Consultation offers a set of Options:

10.1.1. Supporting tourism, arts and cultural heritage
   a. Develop a cultural strategy that helps to define and promote culture/cultural facilities
   b. Direct development of new facilities including hotels towards those areas where there is a lack of provision
   c. Direct new development towards those areas where most people live
   d. Promote the borough as a destination for eco tourism
   e. Promote the borough as a destination for business tourism including the provision of hotels
   f. Promote the borough as a location for films and develop tourist facilities to support this

10.1.2. Aside from the disproportionate allocation of questions between tourism, arts and cultural heritage versus the majority of Gross-Value-Add (‘GVA’) activities in the Borough, there is no sense in these options that the implications on space requirements (and consequent impact on Green Belt) is considered.

10.1.3. Part of the attractiveness of Guildford, as a gap town, is its setting within open countryside and with views of the hills on either side of the gap. The villages benefit from similar attractions.

10.1.4. The options themselves are peculiar and ill-focused and fail to offer scope for a respondent to think in terms of other tourism, arts, culture, leisure and entertainment options might be provided (for example, a cultural centre (like The Maltings or The Lightbox) or even an open air stage given the performances by The Guildford Shakespeare Company among others).

10.2. There is a complete disconnect between:

10.2.1. the hours of operation of Park & Ride, out-of-hours parking charges and local bus services, and

10.2.2. the aspiration to develop an evening economy in Guildford.

10.3. The High Street is full of cars in the evenings, parking to avoid paying charges for evening parking in the car parks, park & ride ends at 7pm (and the hours for the new park & ride at Onslow even preclude using it for...
linked trips for hospital visitors, causing greater traffic and parking issues at the hospital).

10.3.1. It should be noted that for some of our members, on-street parking helps to enliven the town and that some people do not like to use multi-storey car parks after dark.

10.3.2. On the other hand, a town that is consciously planned to be lively in the evenings should help to enliven the High Street and the greater amount of use of car parks may make them feel safer in the evenings.

10.4. Whilst it is good to have visible signs of activity in the town, there needs to be a more co-ordinated approach to the use of the town’s spaces and places and visitor parking.

10.5. Residents across the Borough are unable to socialise in the evenings or attend evening events in the town centre – or neighbouring Settlements – because buses have stopped running and some may not have access to private cars or be able to afford taxis.

10.6. Guildford Library could be relocated within the town centre – perhaps close to wherever the relocated bus station will be – and the existing site (along with its 1960’s office block neighbour) could be opened up to Guildford House to show off the historic rear elevation with the balance of the site used as a potential extension to Abbot’s Hospital for Guildford Borough residents in need of accessible affordable housing in the town centre.
CONSULTATION QUESTION 11 – EMPLOYMENT & JOBS

Q11. Employment and Jobs

11.1. This is a very wide topic for one question and the Issues and options Consultations sets out three series of Options:

11.1.1. Supply and location of office and industrial buildings
   a. Plan to provide enough employment land only to meet the expected employment needs of existing and new residents
   b. Plan to provide enough employment land to meet the expected employment needs of existing and new residents and commuters
   c. Plan to provide extra employment land to meet the expected demand from a growth in business activity
   d. Plan to provide for additional employment land as a priority, to pursue high levels of growth
   e. Plan to protect our strategic employment sites as defined in the Employment Land Assessment
   f. Plan to redevelop and intensify the use of existing sites
   g. Plan new employment throughout the borough
   h. Plan new sites in rural areas that re-use rural buildings for employment use

11.1.2. Lack of suitable office and industrial buildings
   a. Meet the need for higher quality flexible space by planning for the refurbishment of existing office and industrial floor space
   b. Meet the need for higher quality flexible space and larger units through expanding existing
   c. Business parks to provide new, high quality offices and industrial space
   d. Meet the need for higher quality flexible space and larger units by planning to provide new, high quality offices and industrial space as part of any urban extension
   e. Meet the need for head quarter office buildings of substantial size and high quality
   f. Meet the need for higher quality space and larger units by creating new high quality industrial and office space
outside of the urban areas, potentially opening a new business park in the countryside

11.3. Supporting our rural economy
   a. Support economic growth in rural areas
   b. Balance protecting agricultural land and supporting economic growth
   c. Encourage tourism related development in the rural areas to support the rural economy

11.2. Economic Growth is an imperative for the future well-being of the Town and Borough. The key questions for the Consultation should be the extent to which respondents feel growth should be constrained or encouraged. The key data missing from the Consultation and Evidence Base is how to interpret the implications of growth upon the incremental increase (if any) of housing driven by such growth, and the capacity of Guildford’s employment areas (if better planned) to accommodate some or all of that growth.

11.3. The Options listed at 11.1.2 above may elicit some disagreement between:
   a. those, on the one hand, for whom the provision of space for headquarter offices simply generates Demand and Need for additional housing for which there are insufficient sites without incursion into the Green Belt – favouring instead the fostering and encouragement of more SMEs, and
   b. those who consider that, as a successful town, Guildford should be able to attract large companies, but for whom insufficient information has been provided in the Evidence Base to understand the consequences of such an approach.

11.4. The Guildford Society wishes to ensure that Guildford is able to grow, acknowledges historic growth rate trends and understands the principle that growth comes with its own baggage in the form of ancillary and consequential Demand and Need for additional land for support sector businesses and housing. It is unfortunate that the Evidence Base is signally unhelpful in terms of data and information that would allow any clear direction or conclusion to be drawn.

11.5. Indeed, Question 11 is set out in such broad terms that it fails to address many of the key success factors for businesses inasmuch as the Employment Land Assessment (‘ELA’) looks too much at existing land use (with Guildford (some notable exceptions aside) somewhat in decline as a business location other than related to the Research Park. The ELA looks insufficiently at opportunity, demand and aspiration. This may be because, whereas housing strategy is framed by SHMA, SHLAA and the ‘How Many Homes?’ documents, the employment land strategy is not based on a similar data gathering process and the ELA almost pointedly...

11.5.1. **The Surrey Research Park** is and should be a world-class centre and cluster of knowledge-based businesses of national, regional and local importance, leveraging the University of Surrey and the highly-qualified local population. It should be allowed to grow within reasonable limits and to attract new businesses and additional Gross Value Add (‘GVA’) to the town and Borough. Good public transport and traffic infrastructure will be required to ensure this can thrive and compete with other areas of the country.

11.5.2. **Guildford Business Park** was conceived as a regionally important hub for offices and, with adequate improvement to strategic infrastructure, and access to housing stock which employees can afford, it can resume its role and attractiveness to major corporate occupiers (Guildford having dropped off the list of many major companies due to congestion and lack of housing affordable to staff).

11.5.3. **Slyfield** provides important local employment and should be allowed to grow to provide additional employment opportunities as the town and Borough’s population grows. It needs to be blessed with much better transport infrastructure and connectivity to the town, the Borough and major roads and rail. It is also reasonable to assume that such improvements in its local infrastructure will increase demand for such space beyond the levels of growth highlighted in the ELA. This approach may require a rethink of planning uses around the existing estate.

11.6. Public transport links and a business-based park & ride may well help to alleviating some of the worst issues faced by businesses and employees. It would also mean that Guildford can be a centre for employment but recognising that commuting (preferably by public transport) can help provide employment to people living in the wider Strategic Housing Market area – which should not be restricted to Waverley, Woking and Guildford as previously noted.

11.7. It may well be that **better use can be made of existing commercial and business space** (for example, Walnut Tree Close and Woodbridge Meadows which would be capable of accommodating a substantial amount of residential units close to the town centre, whereas this is a generally failing area for business space). Suitable protection must be given to key employment areas (e.g., those referred to in numbers 11.5.1, 11.5.3 above), whereas other sites may benefit from a more flexible treatment.
11.8. The use of sites such as Walnut Tree Close and Woodbridge Meadows could, if comprehensively planned (at a density of 80 dwellings per hectare between the railway and the road falling to 40dph between the road and a linear riverside park) provide around 1,000 homes. The greater land area otherwise required to accommodate such housing elsewhere (say, at Slyfield) at a density of, say, 30-40 dph, could be used to extend the existing commercial property and, with good public transport links, could be a much more sustainable solution to Guildford’s housing and employment land need.

11.9. In terms of rural economy (which almost seems as though it should be a separate question in this consultation), several of the farms around the outside of the Guildford Urban Area are either owned or controlled by the Council or the University.

11.10. Great care must be taken to ensure the public ownership of farms such as South Warren Farm does not lead to any relaxation of controls over development, either in the Local Plan or beyond.

11.11. A reasonably high proportion of business employment is in the rural areas, despite being ‘unsustainable’ by the Council’s own criteria, and this should be protected where practicably possible.

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1 David Ogilvie’s plan provided to Guildford Borough Council
CONSULTATION QUESTION 12 – TOWN CENTRE SPD

Q12. Town Centre SPD following adoption of Local Plan

12.1. The Issues and Options Consultation sets out a single Option:

12.1.1. **Guildford town centre**

a. To produce a Town Centre SPD following adoption of the Local Plan

12.2. The Guildford Society firmly believes that this is an unsustainable and illogical approach to both the Local Plan and the Town Centre.

12.3. The current proposal seems to be to:

12.3.1. Develop North Street (Up to 60% increase in Retail in Guildford)

    then

12.3.2. Adopt Local Plan (Up to 40% increase in Housing in Guildford)

    and only then

12.3.3. Produce Town Centre Plan (After the damage has been done)

12.4. The Local Plan envisages unprecedented levels of development both within the Town Centre and around the outside and approaches – and yet there is no process to establish how to ensure that sustainable development is **maximised** within the Town Centre in a way which contributes favourably to what Guildfordians want for their town and which allows as little as possible incursion into the Green belt and which ensures the traffic and transport networks can support it.

12.5. Bringing the Local Plan before the Town Centre Plan risks establishing uses for sites which later prove to be out of balance with the opportunities and which cannot be implemented under an SPD, but would require the Town Centre Plan to be exposed to Public Inquiry.

12.6. If there is not sufficient analysis of the options for the **town centre** (such as developing Walnut Tree Close and Woodbridge Meadows for housing and, thereby, meeting a large proportion of the likely housing target) the entire Local Plan could be open to challenge – particularly if it does advocate a redrawing of the Green Belt boundary.

12.7. Displaced employment should be relocated to the established employment centres around the Guildford Urban Area and the Borough –...

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2 It is noted that reference to Walnut Tree Close in the context of a section on the Town Centre does not ring entirely true to the boundary reproduced below at Section 13.1.1. This apparent anomaly is simply a function of a notional red line. The concept is for more residential development in the centre of the town or Guildford Urban Area – whether or not it falls within the designated ‘Town Centre’.
possibly to Slyfield in either an extension of the existing centre or elsewhere, and possibly necessitating some limited and permanent realignment of the Green Belt boundary.

12.8. The Guildford Society, with Guildford Vision Group, have developed a ‘Vision’ document for discussion with stakeholders and we consider it would be perfectly possible to develop a Town Centre plan in tandem with the Local Plan, feeding evidence to and from the Local Plan process and ensure that the Town Centre can be central to the Borough not only geographically but also in planning terms. We have always maintained that Guildford must pull its weight in bringing about Economic Growth and new housing. This is absolutely consistent with a demand to see the Town Centre Plan commenced now, in public consultation and engagement and with a view to adopting it at the same time as the Local Plan if not earlier. The Vision Document is attached at [APPENDIX 6 – GVG VISION DOCUMENT] as part of our submission to the Local Plan Consultation.

12.9. The document contains a series of Sections on how Guildford could be in 2030 with positive, holistic planning:
   12.9.1. Transport & Connectivity
   12.9.2. Architecture
   12.9.3. The Riverside
   12.9.4. Dynamic Global Hub
   12.9.5. Strong Social Infrastructure

12.10. We have included a series of postcards contributed by residents and we aim for more feedback in the form of “postcards from the future” from anyone involved in Guildford.

12.11. Growth need not compromise Guildford but a poor sequential approach to planning undoubtedly will.

12.12. Neither The Guildford Society nor Guildford Vision Group is against growth or development - WE JUST WANT THE RIGHT KIND OF GROWTH AND DEVELOPMENT.
Q13. Settlement Hierarchy and Boundaries

13.1. The Issues and Options Consultation includes the following Options:

13.1.1. Supporting our local centres, district centres and Guildford town centre

- Retain the current hierarchy of town, district and local centres with the exception of upgrading Ripley from a local to a district centre
- Redefine Guildford town centre’s boundary to that now shown on Figure B (shown below):

13.2. It is worthy of note that the proposed town centre boundary is actually smaller than that in the 2003 Local Plan and the Town Centre Area Action Plan.

13.3. The premise for this question seems to be that Guildford town centre must be more like other town centres. Guildford’s future character cannot be determined by reference to a comparison “to the national average spread of uses in town centres” – especially when an analysis of rateable areas of retailer floor space in the town centre (Valuation Office Agency) in excess of 170,000 square metres suggests there is considerably more retail floor...
space in the town centre than is identified in the 2011 Retail and Leisure Study (based on October 2005 GOAD data).

13.4. **It is essential that Guildford’s capacity, mix of uses, provision of public spaces, etc., is determined by a comprehensive master planning exercise and not by reference to public responses guided by flawed data and a predisposition to benchmarking with other towns when Guildford is already seen as an attractive shopping destination.**

13.5. This does not suggest that Guildford would not benefit from additional retail – nor that there is a majority of the population either in favour of or against the enlargement of the town centre.

13.6. The key question for Guildford seems to be “how much are we prepared to spread into the Green Belt and Countryside in order to accommodate a lot of housing development?” This must be seen, therefore, against a need to make the very best use of each development opportunity in the town to accommodate housing and, therefore, to reduce the pressure on Guildford’s green surroundings. **(Deleted: need to revisit the Settlement Hierarchy Report)**

14.1. The Issues and Options Consultation sets out the following Options:

14.1.1. **Balancing development with traffic and congestion**
   a. Focus new development that will generate significant movement in locations where the need to travel will be minimised and the use of sustainable transport modes can be maximised, including locations which can be made highly accessible by passenger transport (including by park and ride services) and are served by cycle and pedestrian routes
   b. Expect all developments that generate significant amounts of movement to provide a long-term travel plan, identifying the movements the development will generate and how these would be managed to deliver sustainable transport outcomes
   c. Continue to identify and bring forward further park and ride facilities, particularly along the northern and eastern approaches to Guildford town
   d. Require new developments to make use of or contribute financially towards improvements to passenger transport services (including park and ride services) and improved access for cyclists and pedestrians
   e. Set aside more road space on the main approaches into Guildford town centre to improve routes for pedestrians, cyclists and buses

14.2. This question should be seen against the following context:

14.2.1. “Guildford is to be a town and borough with strong infrastructure, world class business with capacity to expand and deliver growth; an evolving and vibrant economy which creates a progressive and sustainable environment for people today and for future generations living in an ever improving society” (Economic Strategy)

14.3. **Journey Time Reliability (JTR)** is a key issue for the Borough’s transport system and it applies equally to cars, freight movements and public transport.
14.4. **Unreliable journey times** adversely impact on Guildford’s Economy and on People’s Routines – schools, offices, businesses and choices of places to visit and shop.

14.5. **JTR improvement should be a principal objective of the Borough’s Movement Strategy.** It is particularly unreliable during morning and evening peak times when serious delays affect all road users, including public transport (Infrastructure Baseline (IB) ¶4.13 to 4.15).

14.6. **Whilst it is obvious that any new development should be required to have minimum impact on the system and JTR, major problems exist NOW – a 14mph daily average for traffic is unacceptable – and integrated plans must be put in place to unlock the network infrastructure.**

14.7. **Serious investment should be envisaged in addition to that being sought for gyratory improvements (IB ¶4.26).**

14.8. **Large volumes of through traffic should not be allowed to damage Guildford’s well-being and prosperity.**

14.8.1. **Surrey County Council (‘SCC’) origin & destination (‘o/d’) peak hour data for the gyratory demonstrate that some 40% of vehicles entering it from any direction proceed along Onslow Street – indicating that a similar proportion is cross-town or through traffic;**

14.8.2. **Further o/d data should be collected for the several Approaches to the town to accurately assess the amount of through traffic both north-south and west-east north. This will enable the measures necessary to be designed to divert traffic away from the town.**

14.9. **In terms of Public Transport Infrastructure, in order to emphasise their desire for a modal shift away from car use, the Council and SCC need to**

14.9.1. **agree to design and implement an overarching plan for Public Transport – this is currently at risk of being developed piecemeal following the planned removal of the present bus station.**

14.9.2. **see public transport as a key part to any development of new residential quarters in Guildford town and borough**

14.10. **Key requirements are:**

14.10.1. **Bus facilities in the shopping centre with attractive and comfortable waiting facilities; and**

14.10.2. **Connectivity with the main Railway Station**

a. **The 2003 Local Plan (GT8) ¶9.55 calls for enhanced transport interchange facilities at the railway station.** This was reinforced in a Draft Planning Guidance Note (April 2003) with a Master Plan envisaged in June 2006 (Local Committee 15th June, 2006 – Item 11) but no further progress has been made. As the numbers of travelling public have increased, the need for enhanced **...**
14.11. **Bus/rail interchange facilities at the railway station is now even more urgent than it was then.**

b. The station forecourt provides an opportunity for bus/rail and bus/bus interchange. With attractive and comfortable waiting facilities, passengers could make direct connections between services to and from the south (Cranleigh, Bramley, Shalford, Godalming, etc.) and those from the west (Onslow P&R, Hospital, university and Research park), which would continue to run to the centre. Such an arrangement must complement facilities in the shopping centre and this must be a planned integration. The necessary railway station forecourt space should be acquired from Network Rail by the Borough either by Compulsory purchase Order or in exchange for part of Guildford park Car Park and the road system should be designed accordingly. To avoid long delays to buses, it would be best to have a separate bus-only route to the centre of town.

14.11. The Local Plan must enable, create and/or reserve pleasant, safe and friendly environments for **pedestrians and cyclists** both in the town (benefitting from 14.10.2 above), with links between the town centre and the Surrey Research Park, Guildford Cathedral, the Royal Surrey County Hospital and the University of Surrey, and taking advantage of routes along the Wey Navigation.

14.11.1. Walking:

a. Already a significant number of journeys are done on foot. Over 10% of journeys to work by residents living in or near the town centre are done by walking and of course, many journeys with the major mileage done by car, bus or train, have a 10-15 minute walk at the end and/or at the beginning. There are also large numbers of people who walk in the countryside for pleasure and exercise.

b. The town of Guildford has the basic layout to make walking convenient and often pleasant. The Wey Navigation and the green areas alongside it stretch right into the town and there are many alleyways to the town centre giving permeability and routes of busy roads for pedestrians. Many of the pedestrian routes in the town centre are, however, blighted by the dominating presence of traffic, with its noise and obtrusiveness. The route from the station to the town is notorious for its...
narrow width, the slow crossings and its unattractive nature. The route to the Cathedral must be improved.

The Local Plan should encourage the creation of more pedestrian ways, ensure 4-way pedestrian crossings are provided at busy junctions eg Stoke Road/York Road, avoid obstructing the pavements with signs and make pedestrians feel that they have the right to be there rather than just tolerated.

14.11.2. Cycling

a. In contrast to walking, cycling lacks the basic infrastructure to encourage cycling. Much needs to be done to make cycling safe and attractive to new potential cyclists. The urban area of Guildford is almost uniformly hostile to cyclists. There are virtually no off-road routes through the town and only limited on-road routes. As the consultation draft of the Surrey Cycling Strategy says: “we need to provide safe cycling routes to encourage new cyclists”. The LSTF programme will improve cycling facilities especially alongside the A25, including Ladymead, where the route is almost entirely off-road.

Many of the measures in the Surrey Cycling strategy will improve matters for cyclists, but the main barriers to cycling need to be addressed: the A3 and other major roads, the railway and the inner gyratory.

b. Important new facilities dedicated to cyclists and walkers are needed. A new bridge to replace the Wooden Bridge bridge across the A3/A25 is needed to break the barrier between north and central Guildford. A new tunnel should be provided under the railway between the Middleton Road industrial estate and the University. There should be a bridge suitable for cyclists across the Wey near the Guildford Cricket Club. And the town centre needs to be made useable by cyclists: Only the most dedicated will brave the central gyratory.

14.12. Overriding all of these considerations is that the Town Centre bears a disproportionate brunt of traffic congestion already and it is essential that a Town Centre Master Plan is put in place to accommodate the physical spatial needs and the financial contributions and leverage required for serious investment in new infrastructure – possibly including new bridges and/or tunnels.
Q15. Addressing Access and Transport Issues

15.1. The Issues and Options Consultation sets out the following Options:

15.1.1. Minimising the impact of traffic congestion on our communities

a. Explore opportunities to improve connections within Guildford town centre

b. Explore the opportunities to improve connections between the town centre and the wider town, including to neighbourhoods and destinations to the north and west of the A3 corridor

15.1.2. Promoting alternative ways of moving around the borough

a. Improve our communities’ experience of catching buses into and from Guildford town centre by increasing efficiency and coordination of services

b. Improve our communities’ experience of changing between bus and train services in Guildford town centre by increasing efficiency and coordination and provide new places for people to access rail services

c. Use opportunities through the design of new developments and the negotiation of planning contributions to improve cycling and walking routes in our urban areas, villages, hamlets and rural areas

d. Use opportunities through the design of new developments and the negotiation of planning contributions to improve bus and community transport services, in our urban areas, villages, hamlets and rural areas

15.1.3. Working with our partners

a. Continue working with our partners to address transport related issues

15.2. The Local Plan needs to advocate and bring forward the design and implementation of an Integrated Transport Structure for the Town, including the A3, providing

15.2.1. Solutions to current transport issues (¶¶ 4.13 to 4.15 and in the Infrastructure Baseline document) as well as the need to cater for future development must be resolved by designing solutions for
the network as a whole. This requires close co-operation between the Council, SCC and the Highways Agency.

15.2.2. Major capital projects (road widening, new bridges over the Wey and railway, and/or tunnels) and the land required for them MUST be identified as part of the Local Plan and reserved for the purpose so that necessary provisions can be made.

15.2.3. Funds which need to be secured against future development to unlock the traffic stranglehold that threatens Guildford’s future well-being and prosperity.

15.3. As noted above, therefore, it is essential that a Town Centre Master Plan is put in place to accommodate the physical spatial needs and the financial contributions and leverage required for serious investment in new infrastructure – possibly including new bridges and/or tunnels.
Q16. Infrastructure and Service provision

16.1. The Issues and Options Consultation sets out as an ‘Option’:
   16.1.1. Infrastructure and service provision
      a. Continue to work with infrastructure providers to ensure that they plan for necessary infrastructure, taking into account the proposed amount and locations of development to be planned across the borough within the plan period

16.2. It should not be an OPTION whether the Council continues to work with infrastructure providers. This should be a given.

16.3. As noted above, therefore, it is essential that a Town Centre Master Plan is put in place to accommodate the physical spatial needs and the financial contributions and leverage required for serious investment in new infrastructure of all kinds and to identify whether there is any scope to bring forward regeneration of areas such as the BT Building by combining several infrastructure projects.
Q17. Green Belt and Countryside

17.1. The Issues and Options Consultation includes the following Options:

a. Ensure that all development proposals identify positive measures to protect and improve biodiversity
b. Enhance the value and biodiversity of waterways
c. Expect new development to provide additional open space or to improve existing spaces, or an equivalent financial contribution to include provision for ongoing maintenance
d. Expect new development to contribute to the borough’s network of green open spaces and links between these

e. Take a flexible approach to the loss of open space that is assessed as poor quality, where there is a surplus of open space
f. Require developers of large developments to provide their own Suitable Alternative Natural Green space (SANG)
g. Continue to work to deliver the expanded and new SANG sites set out in the Council’s Thames Basin Heaths SPA Strategy
h. Identify further new SANG in suitable locations

17.2. There is no attempt to ask whether the Council’s approach to Green Belt and Countryside is correct and nothing in these options to suggest that Green Belt might be appropriate (even under very special circumstances) to accommodate any development, far less have its boundaries realigned.

17.3. At 2.8.1 above we have outlined that The Guildford Society is concerned about serious flaws in the GBCS.

17.4. There has been plenty of outrage in the community about some of the suggested changes to the Green Belt boundary although The Guildford Society is aiming (at this stage) to ensure the processes of identification and analysis of each respective site are correct (aggregate demand and supply of land) – including putting forward additional alternatives – rather than get drawn into a specific debate about which (IF ANY) should be advanced for development.
17.5. Largely, however, this question deals more with the suitability of the Evidence Base and our comments of relevance to this section are set out in Question 2.

17.6. The Options themselves do not refer to Green Belt designations nor to Areas of Outstanding Natural Beauty. There should have been an Option whereby respondents could express a wish to rule sites in the AONB out for the purposes of major development (given that there are already defined tests under planning law to provide development in an AONB under very special circumstances).

17.7. The Guildford Society is clear that it must be inappropriate to label any land in an Area of Outstanding Natural Beauty as a Potential Development Area in the GBCS as to do so may give rise to consequences outside the Council’s control.
CONSULTATION QUESTION 18 – BUILT ENVIRONMENT

Q18. Good Design and the Built Environment

18.1. The issues and Options Consultation sets out the following Options:

18.1.1. Built environment
   a. Identify locations in the borough which have strong local distinctiveness and require new developments to conform to that local style, whilst allowing more innovative design in all other areas
   b. Identify opportunities to improve connections within and beyond the town centre, including links to the River Wey, the University of Surrey and railway station
   c. Plan for improvements to existing, and provision of new, well-designed public spaces in Guildford town centre, in Ash and Tongham, in our villages and other strategic growth schemes as part of any major new development

18.2. The Guildford Society strongly promotes and supports good design, sponsoring a biennial Design Award and carefully monitoring planning applications in Guildford for the quality of design (amongst other considerations).

18.3. The Guildford Society Design & Heritage Group is in the process of preparing several design statements reflecting qualities and characteristics of Guildford which we believe should be material factors to be taken into account when considering a planning proposal in Guildford (attached at APPENDIX 7 – DESIGN & HERITAGE DOCUMENT)

18.4. It is interesting that the above options should have been advanced, given there is so little character analysis of Settlements and Neighbourhoods in the Settlement Profiles Report.

18.5. The Guildford Society is also concerned about the reference to planning policy leading us to “more innovative design in all other areas” without setting any criteria for good design and implementation.

18.5.1. There is clearly scope to introduce high quality design of contemporary buildings even in Conservation Areas (such as Steamer Trading) where there is good local dialogue (and even architectural competitions).

18.5.2. The Guildford Society would like to be involved in discussions of design at an early enough stage to provide meaningful input but
also to fully understand the issues and options being considered when preparing a design for a new development.

18.6. Connections are clearly important but most of these should be dealt with in a Town Centre Master Plan which should be brought forward in parallel to the Local Plan process if not before.

18.7. Well-designed public spaces in the Town Centre are important and highly desirable, but these should be dealt with in a Town Centre Master Plan which should be brought forward in parallel to the Local Plan process if not before.

18.8. NPPF States that:

18.8.1. NPPF 56: The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.

18.8.2. NPPF 57: It is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes.

18.8.3. NPPF 58: Local and neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and on understanding and evaluation of its defining characteristics. Planning policies and decisions should aim to ensure that developments:

a. will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

b. establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;

c. optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks;

d. respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;

e. create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and
18.8.4. **NPPF 59:** Local planning authorities should consider using design codes where they could help deliver high quality outcomes. However, design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally.

18.8.5. **NPPF 60:** Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness.

18.8.6. **NPPF 61:** Although visual appearance and the architecture of individual buildings are very important factors, securing high quality and inclusive design goes beyond aesthetic considerations. Therefore, planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment.

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

18.8.8. **NPPF 63:** In determining applications, great weight should be given to outstanding or innovative designs which help raise the standard of design more generally in the area.

18.8.9. **NPPF 64:** Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

18.8.10. **NPPF 65:** Local planning authorities should not refuse planning permission for buildings or infrastructure which promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design (unless the concern relates to a designated heritage asset and the impact would cause material harm to the asset or its setting which is not outweighed by the proposal’s economic, social and environmental benefits).
18.9. The NPPF places a high burden upon both developers and Local Planning Authorities and The Guildford Society recognises that it does not make it easy to frame policies that deliver both protection and innovation with any certainty of strategic planning outcome.

18.10. The NPPF should be taken as a whole and these guides to design should be read in the context of the entirety of the NPPF.

18.11. The Guildford Society considers that all applications made in the Guildford Urban Area or around its fringes should be subject to FORMAL consultation with The Guildford Society in accordance with NPPF 62 (see 18.8.7).

18.12. Ash & Tongham have not been considered in sufficient detail for The Guildford Society to comment on what should be their approach to the Local Plan and these options.
Q19. Climate Change and Sustainability

19.1. The Issues and Options Consultation sets out the following Options:
   19.1.1. Climate change and sustainability
   a. Require consequential improvements to existing buildings when applicants apply for planning permission, unless the improvements are not viable
   b. Develop a renewable energy strategy that identifies suitable sites for renewable energy and promotes the development of CHP networks
   c. Introduce a more stringent standard where viable for water use in new homes, requiring water saving measures and a per person consumption target lower than 105 litres per day

19.2. Please see the note at Page 16 relating to the definition of Sustainability which has been misused (or at least borrowed for many different purposes without separate definition and clarification) within the Evidence Base and the Consultation Paper.

19.3. The purpose of 19.1.1.a is not clearly articulated although it seems a logical position with the caveat, and it should apply as part of the Building Control process under the Building Regulations.

19.4. The relevant document in the Evidence Base (2.11) is out of date and it is difficult to see that this Option is either comprehensive enough or that it has the scope to accommodate the best possible technologies at the time of any application (as distinct from previous technologies which may have been superseded).

19.4.1. The reference to CHP fails to acknowledge how difficult it is to make such installations viable and there are other modern technologies which could be just as effective if not more so.
CONSULTATION QUESTION 20 — SETTLEMENT HIERARCHY

Q20. Settlement Hierarchy

20.1. The Issues and Options Consultation includes the following Options:

20.1.1. Settlement hierarchy

a. Use the settlement hierarchy to judge the appropriateness of developments
b. Use other research to help judge the appropriateness of developments

20.2. There is no opportunity to question whether the settlements should change in status – and yet the scale of development will almost inevitably lead to fundamental changes in some areas.

20.3. The current listing is:

20.3.1. URBAN AREAS

a. Guildford Urban Area
b. Ash & Tongham Urban Area

20.3.2. SEMI-URBAN VILLAGE

a. East Horsley

20.3.3. LARGE VILLAGE

a. Normandy & Flexford
b. Fairlands
c. Pirbright
d. Wood Street Village
e. Ripley
f. Send
g. Send Marsh & Burtthom
h. Shalford
i. Chilworth

20.3.4. MEDIUM VILLAGE

a. West Horsley
b. Worplesdon
c. Effingham
d. Jacobs Well

20.3.5. SMALL VILLAGE

a. Peasmarsh
b. Shere
c. Peaslake
d. Compton
e. Gomshall
f. West Clandon
g. Puttenham
h. Albury
i. Ash Green

20.3.6. HAMLETS
a. East Clandon,
b. Ockham,
c. Seal & The Sands,
d. Holmbury St Mary,
e. Wanborough,
f. Shackleford,
g. Wisley,
h. Wyke,
i. Eashing,
j. Farley Green,
k. Hurtmore,
l. Littleton,
m. Artington,
n. Fox Corner

20.4. One clear criterion for judging the appropriateness of development would be VIABILITY;

20.4.1. A village should be allowed to grow if this would ensure that a village shop, pub, community centre or school will be or become viable.

20.4.2. Such developments need to be seen in the context of AONB and Green Belt designations and should be determined at least in part through the Parish Councils
and allowing the village to have a clear voice.
CONSULTATION QUESTION 21 – GREEN BELT STATUS

Q21. Green Belt Status of Villages (and Boundaries)

21.1. The Issues and Options Consultation includes the following Options:

21.1.1. Villages in the Green Belt
   a. Use the recommendations set out in volume four of the GBCS to identify new settlement boundaries for some villages to remove them from the Green Belt

21.2. The GBCS is not fit for purpose and neither is the Settlements Report

21.3. Consequently, there is insufficient evidence to determine what approach should be taken to villages, settlement boundaries and Green Belt designations

21.4. Of more immediate importance to The Guildford Society is the question as to why it was considered inappropriate to ask the equivalent question for the Green Belt around the outside of the Guildford Urban Area.

21.5. Again, for the Urban boundaries, there is insufficient evidence to determine what approach should be taken to revising Green Belt boundaries if such should PROVE to be required.
CONSULTATION QUESTION 22 – ASH GREEN & TONGHAM

Q22. Ash Green and Ash South & Tongham

22.1. The Issues and Options Consultation provides the following Options:

22.1.1. Ash Green

a. Include Ash Green within the urban area - Ash Green would be linked to the urban area by land identified in research (GBCS potential development areas K9, K8 and K6 north)

b. Define a boundary for the settlement of Ash Green so that it becomes an identified settlement within the rural area

22.2. Ash Green, Ash South & Tongham have not been considered in sufficient detail for The Guildford Society to comment on what should be their approach to the Local Plan and these options.
CONSULTATION QUESTION 23 – CROSS-BOUNDARY ISSUES

Q23. Managing Cross Boundary Issues

23.1. The Issues and Options Consultation offers the following ‘Option’:
   23.1.1. Duty to cooperate
       a. Continue working actively and constructively with our partners to address cross boundary issues

23.2. The documents do not give any indication of the scope and scale of Cross-Boundary working which makes it very difficult to respond to the single option which suggests carrying on as we are;

23.3. In the absence of a Strategic Housing Market Assessment we cannot tell whether demand and supply issues are being dealt with in a co-ordinated manner;

23.4. Not all affected local areas are mentioned in the Local Plan documentation;

23.5. The previous SHMA for the West Surrey Strategic Housing Area seems inappropriate given the origins and destinations of employees;

Table 4 - Work locations of residents of Surrey boroughs and districts (2001)

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Source: Census 2001
23.6. The above table – prepared from 2001 census data – will presumably be renewed in Spring 2014 with publication of further 2011 census data.

23.7. The table completely ignores Rushmoor and the Hampshire authorities despite there being a proposal to add thousands of houses just across the boundary with Aldershot and the fact that 32% of employees in Guildford travel from outside these areas of Surrey.

23.8. The Strategic Housing Market Area should be widened to include, say, 90% of the employee catchment for Guildford given its regional strategic status.

23.9. Housing should be provided within the Strategic Housing Area and not just within Guildford to service the employment needs of the Town and Borough.

23.10. The neighbouring or nearby local authorities who have made the greatest progress in delivering housing development allocations for the next five years may very well have opportunities to bring forward development in the near term to help Guildford meet five-year housing Need, and may be able to trade their opportunity with Guildford’s identified scope (SHLAA) to deliver greater numbers in years 6 to 15.

23.11. The Guildford Society expects to see evidence that no stone has been left unturned before accepting that the Council has no choice but to advocate a redrawning of the Green Belt boundaries around Guildford and its villages.
CONSULTATION QUESTION 24 – HOUSING – SPATIAL OPTIONS

Q24. Planning for Sites or Spatial Options

24.1. The Issues and Options Consultation sets out Spatial options for meeting housing need (see below):

![Diagram showing potential housing options]

Figure C: Potential housing examples

24.2. Whereas the pin-wheels show an assumed route to meeting the housing numbers, analysis carried out by Guildford Vision Group and The Guildford Society indicates that around 3,500 homes could be provided.
as a relatively high density by changing uses on Walnut Tree Close with an open area fronting the River Wey (see Section 11.8 above).

24.3. This exercise demonstrates that a comprehensive Town Centre Master Plan can deliver major quantities of development and reduce the pressure on the Green Belt.

24.4. The Issues and Options Consultation then shows various ‘Options’ as follows:

24.4.1. Redevelop appropriate buildings and spaces in our towns and villages

   a. This would involve converting existing buildings and providing new buildings within the existing urban areas of Guildford, Ash and Tongham, and within the existing boundaries of our villages, to provide new homes and other buildings. These kinds of sites are often, but not always, land that has been developed before (previously developed land).

   b. Our research in the SHLAA tells us that continued development in these areas could provide 3,302 homes in the years 2015-2031.

24.4.2. Use land on the edge of villages to provide affordable housing for local need

   a. This option involves building new affordable homes on land outside of but closely related to the existing boundaries of villages, to provide affordable homes. These are known as rural exception housing schemes as they are allowed as exceptions to the normal planning policies that discourage new homes being built in the countryside. Local communities sometimes suggest opportunities for schemes like this after a survey has identified housing need in their parish. We cannot permit rural exception sites of this kind around the urban areas of Guildford, and Ash and Tongham.

   b. Our research in the SHLAA tells us that we could achieve 160 homes on rural exception sites in the years 2015-2031.

24.4.3. Reuse previously developed land in the countryside

   a. Previously developed land (defined in the NPPF) which is or was occupied by a permanent structure including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure in the countryside that has potential for
appropriate redevelopment to help meet future development needs.

b. Our research in the SHLAA tells us that we could achieve 269 homes on previously developed land in the countryside in the years 2015-2031.

24.4.4. Use countryside land in the west of the borough

a. We could provide development by extending the existing urban area of Ash and Tongham into the countryside to help to meet our housing, employment and infrastructure needs. (Extension(s) to the Guildford urban area is another option that is explained below).

b. This could provide new neighbourhood(s) within reach of existing transport links, shops, schools and health care, as well as bringing new or improved services and facilities that may also benefit surrounding existing residents.

c. Our research in the SHLAA tells us that we could achieve at least 2,004 homes on some of this land however, we could consider using more of this land to provide approximately 4,556 homes in the years 2015-2031.

24.4.5. Use countryside in the centre of the borough by extending Guildford town’s boundaries

a. We could extend the existing urban area of Guildford into land currently designated as Green Belt to provide new neighbourhood(s) to meet some of the development that the borough needs in the future.

b. Development in locations like this could integrate well with the existing facilities and services in Guildford town, whilst providing new infrastructure which may also benefit surrounding existing residents.

c. Our research in the SHLAA tells us that we could achieve approximately 1,782 homes if we provide one new neighbourhood or 3,564 homes if we provide two new neighbourhoods in the years 2015-2031.

24.4.6. Use countryside to expand around villages

a. We could expand our villages by developing some of the countryside that adjoins their existing boundaries. Providing new homes and business space can help to support the rural economy including local services within a community.

b. Our research in the SHLAA tells us that we could achieve 2,510 homes on using countryside around villages in the years 2015-2031.

24.4.7. Significantly expand an existing village
The Guildford Society response to GUILDFORD BOROUGH COUNCIL Issues and Option Consultation November 2013 - DRAFT 2a

24.4.8. Create a new village
a. We could create a new village. This would mean building a new settlement with homes, employment, and supporting infrastructure. As it would be a stand alone settlement, it would require a scale of development that could provide the facilities and services to support itself. This includes jobs, shops, community facilities and leisure opportunities to reduce the likelihood that it becomes a dormitory area from which residents need to commute.

b. We estimate that this could provide approximately 2,175 homes in the years 2015-2031 based on the same assumptions towards density, capacity and considerations of availability as the Green Belt and Countryside Study used.

24.5. Option 4 of the How Many Homes? document would provide 204 homes per year, providing for the natural growth of the Borough and a flux of equal numbers of people in and out of the Borough.

24.6. In addition to this most people would probably support provision of more affordable housing.

24.7. Both could be accommodated within the 322 figure or thereabouts.

24.7.1. NB: this implies an affordable housing allocation of 36.65% \([322-204]/322\) similar to current 35% target

24.8. The Pin Wheel exercise (and SHLAA) indicate:

24.8.1. APPROXIMATE CAPACITY 3,731 homes

24.8.2. Additional homes to be found from:

a. Countryside in West of Borough
b. Guildford Urban Extension
c. Countryside around Villages
d. Significant Expansion of a Village
e. Creation of a New Village

24.8.3. In Example 4 of Figure C (reproduced above) the segmented labelled 3564 has been miscoloured.

24.9. The Guildford Society will assist the Council to work towards a working figure at or around the level of the current housing target.

24.9.1. A figure of 345 dwellings per year (6,900 over twenty years) would permit the elimination of the shortfall in affordable
housing (see APPENDIX 3 – How Many Homes?) and is also approximately equal to the 322 figure adjusted for population growth in the Borough since 2004 (the year in which the figure of 322 was adopted for the Surrey Structure Plan).

24.9.2. If the Sedgefield method of meeting housing supply shortfall is used, the average housing provision figure of 345 could remain as an average over the fifteen year life of the Local Plan, but the shortfall would need to be removed in the first five years.

24.10. The Guildford Society recognises, however, that we will need to be prepared for higher numbers and, as a result, we will ensure that we are robust in our responses to ANY DECISION TO AMEND Green Belt boundaries in the event the adopted target number is higher.
CONSULTATION QUESTION 25 – DEVELOPMENT AREAS

Q25. Additional Development Areas in Existing Settlements

25.1. The Issues and Options Consultation identifies parcels of land listed in Appendix D from 1 to 26:

25.1.1. North Street regeneration site (2.52 Ha)
25.1.2. Portsmouth Road surface car park (0.33 Ha)
25.1.3. 1 & 2 Station View (0.68 Ha)
25.1.4. The Plaza, Portsmouth Road (0.38 Ha)
25.1.5. Land and Buildings at Guildford Railway Station (3.6 Ha)
25.1.6. Bedford Road surface car park (0.48 Ha)
25.1.7. Bright Hill car park (0.47 Ha)
25.1.8. Guildford Park car park (1.97 Ha)
25.1.9. Buildings at Chertsey Street (1 Ha)
25.1.10. Jewsons, Walnut Tree Close (0.73 Ha)
25.1.11. Midleton industrial Estate excl. Lexicon House (1.97 Ha)
25.1.12. Cathedral Hill & Guildford Industrial Estates (7.6 Ha)
25.1.13. Land at Guildford Cathedral (3.28 Ha)
25.1.14. Land at Walnut Tree Close (4.5 Ha)
25.1.15. Merrow Depot, Merrow Lane (4.51 Ha)
25.1.16. Guildford Fire Station, Ladymead (0.76 Ha)
25.1.17. Former Pond Meadow School, Westborough (0.6 Ha)
25.1.18. Guildford College, Stoke Road (4.8 Ha)
25.1.19. Slyfield Area Regeneration Project (SARP) (40 Ha)
25.1.20. Lysons Avenue/Station Road East, Ash Vale (9.8 Ha)
25.1.21. Enterprise Industrial Estate, Station Road West, Ash Vale (0.3 Ha)
25.1.22. Ramada Hotel, Guildford Road, East Horsley (1.3 Ha)
25.1.23. Mount Browne (Surrey Police HQ) Sandy Lane (21.39 Ha)
25.1.24. Land around Merrist Wood College, Worplesdon (164 Ha)
25.1.25. RHS Wisley, Wisley (114 Ha)
25.1.26. Bisley Camp, Bisley, Brookwood (79 Ha)

25.2. The listing of sites is noted at this stage and The Guildford Society has not specifically identified other land.

25.3. The Guildford Society has, however, within its responses above, advocated a more comprehensive approach to the Walnut Tree Close, Woodbridge Meadows and Station development areas (see Section 11.8).

Deleted: – other than
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25.4. The Guildford Society also calls for better use of land than for use as surface car parks – whether as part of the University of Surrey or as public car parking in the Town Centre.

25.5. Furthermore, the University can improve on its current use of its existing developed land and this should be encouraged (including considering redeveloping existing student housing to a higher density to help relieve the pressure on neighbouring housing stock, which would release further housing back into the local market.

25.6. The sites in the Area of Outstanding Natural Beauty that fall within the list at 9.35 of the Issues and Options Consultation Document should be excluded and should be presumed as unsuitable for any development in the Local Plan.

25.7. See also response to CONSULTATION QUESTION 41 – OTHER COMMENTS
CONSULTATION QUESTION 26 – DEVELOPMENT AT ASH

Q26. Major Development at Ash & Tongham

26.1. The Issues and Options Consultation identifies parcels of land listed in Appendix D from 27 to 34:

26.1.27. Grange Road, Tongham (A31/A331) (18.56 Ha)
26.1.28. Land at Kingston House, Poyle Road, Tongham (3.55 Ha)
26.1.29. Land to the east of White Lane, Ash Green (1.9 Ha)
26.1.30. Land to the south of Hazel Road, Ash Green (2.87 Ha)
26.1.31. Land south of Ash Lodge Drive (42 ha)
26.1.32. Land near The Briars, South Lane & Grange Road (11.2 Ha)
26.1.33. Land to the south and east of Guildford Road (13.15 Ha)
26.1.34. Land to the north west of Ash Green Road (2.91 Ha)

26.2. Ash Green, Ash South & Tongham have not been considered in sufficient detail for The Guildford Society to comment on what should be their approach to the Local Plan and these options.
Q27. New Green Belt Land (around Tongham & Ash)

27.1. The Issues and Options Consultation identifies the following selective options:

27.1.1. Land around Poyle Farm (GBCS, land parcel K5)
   27.1.1.1. Make new Green Belt in the part of the land parcel not identified as a potential development area in the GBCS;
   27.1.1.2. Do not make the land Green Belt, but safeguard it and reconsider it in a future Local Plan; or
   27.1.1.3. Develop this land.

27.1.2. Land to the east of Manor Farm (GBCS, land parcel K3)

   27.1.2.1. Make this Green Belt;
   27.1.2.2. Do not make the land Green Belt, but safeguard it and reconsider it in a future Local Plan;
   27.1.2.3. Carry out further research to see if there may be some small potential development areas; or
   27.1.2.4. Develop this land.

27.2. Ash Green, Ash South & Tongham have not been considered in sufficient detail for The Guildford Society to comment on what should be their approach to the Local Plan and these options.
Q28. Specific Urban Extensions

28.1. The Issues and Options Consultation identifies parcels of land on the edge of the Guildford Urban Area, listed in Appendix D from 35 to 38:

28.1.35. Land at Gosden Hill Farm, Merrow Lane (88.83 Ha)
28.1.35.1. Suggested uses:
   28.1.35.1.1. Primarily new homes,
   28.1.35.1.2. other uses including:
       28.1.35.1.2.1. retirement/care homes,
       28.1.35.1.2.2. offices,
       28.1.35.1.2.3. supermarket,
       28.1.35.1.2.4. food and drink,
       28.1.35.1.2.5. leisure and
       28.1.35.1.2.6. community uses

28.1.36. Land at Blackwell Farm, Hogs Back (139.68 Ha)
28.1.36.1. Suggested uses:
   28.1.36.1.1. Primarily new homes,
   28.1.36.1.2. other uses including:
       28.1.36.1.2.1. retirement/care homes,
       28.1.36.1.2.2. offices,
       28.1.36.1.2.3. supermarket,
       28.1.36.1.2.4. food and drink,
       28.1.36.1.2.5. leisure and
       28.1.36.1.2.6. community uses

28.1.37. Land at Gunners Farm & Bullens Hill Farm to the west of Jacobs Well and south of Salt Box Road (3.39 Ha)
28.1.37.1. Suggested uses:
   28.1.37.1.1. Industrial uses and warehouses

28.1.38. Land north of Salt Box Road and west of the railway line Whitmoor Common (7.88 Ha)
28.1.38.1. Suggested Uses:
   28.1.38.1.1. Industrial uses and warehouses

28.2. The Consultation Document notes:

28.2.35. *Our research (GBCS) identifies more potential land close to Guildford, but it may not be suitable for development:*
   28.2.35.1. Land to the south east of Guildford (this is land to the south of Warren Road) – this land is in the AONB
28.2.35.2. Land to the east of Guildford – this is a golf course and a small part of it is in the AONB

28.2.35.3. Land to the north of Guildford (this is land at Tangley Place Farm)... The site may be better suited to a Park and Ride”

28.3. These site-specific questions will doubtless divide opinions – as will the additional suggestions and/or comments made in this response at Sections 2.23.33 to 2.23.50 of this response.

28.4. The sites in the Area of Outstanding Natural Beauty that fall within the list at 9.49 of the Issues and Options Consultation Document should be excluded and should be ruled out for any development in the Local Plan.

28.5. The Guildford Society is keen to ensure there are fully objective tests both to determine NEED and SUITABILITY

26.2. IF we need to use Green Belt land it should be the most appropriate PERMANENT realignment to deliver development but also long-term protection of our Green Belt and AONB.

28.6. See also response to CONSULTATION QUESTION 41 – OTHER COMMENTS
CONSULTATION QUESTION 29 – VILLAGE EXTENSIONS

Q29. Specific Developments around Villages

29.1. The Issues and Options Consultation identifies parcels of land around villages, listed in Appendix D from 39 to 61:

- 29.1.39. Land to the north of West Horsley (6.1 Ha)
- 29.1.40. Land to the west of West Horsley (8.4 Ha)
- 29.1.41. Land adjoining Tannery Lane, Send (2.5 Ha)
- 29.1.42. Land to the west and south west of Fairlands (27.66 Ha)
- 29.1.43. Land to the west of Westwood Lane, Normandy (3.4 ha)
- 29.1.44. Land to the east of Westwood Lane, Normandy (2.8 Ha)
- 29.1.45. Land to the south east of Hunts Hill Farm, Normandy (1.3 Ha)
- 29.1.46. Land near Anchor Copse, Normandy (1 Ha)
- 29.1.47. Land to the north of Flexford (14.9 Ha)
- 29.1.48. Land to the east of Flexford (2 Ha)
- 29.1.49. Land to the west of Flexford (7.37 Ha)
- 29.1.50. Land to the west of Ripley (10.4 Ha)
- 29.1.51. Land to the west of Chilworth adjoining New Road (4.28 Ha)
- 29.1.52. Land to the east of Chilworth adjoining Dorking Road (5.2 Ha)
- 29.1.53. Land to the east of Shalford adjoining Chinthurst Lane (9.3 Ha)
- 29.1.54. Land to the west of West Horsley (9.8 Ha)
- 29.1.55. Land to the east of Shere Road, West Horsley (1.68 Ha)
- 29.1.56. Land to the north of Send Marsh (2.6 Ha)
- 29.1.57. Land to the north east of Send Marsh (2.5 Ha)
- 29.1.58. Land north of the centre of Send Marsh (6.2 Ha)
- 29.1.59. Land around Burnt Common warehouse, London Road (10.68 Ha)
- 29.1.60. Extension of Peasmarsh Industrial Estate, Old Portsmouth Road (8.42 Ha)
- 29.1.61. Land near Effingham Common Road, Lower Road and Water Lane, Effingham (17.19 Ha)

29.2. This question relates to land around the villages and is best answered by those who live there – but needs to recognise that failure to provide suitable development sites should not lead to Guildford Urban Area having to accommodate an excess of development instead.
Q30. **Other Land around Villages**

30.1. The Issues and Options Consultation includes two further category of land around villages not yet considered:

30.1.1. **Land around villages within the AONB (Puttenham, Compton, Albury, Shere, Gomshall, Peaslake and Holmbury St Mary)** which has not been assessed for its development potential as part of the GBCS.

30.1.2. **Some villages in neighbouring boroughs are close to our boundary.** "We could talk to our neighbouring councils and explore the potential of extending these villages, using land that is in our borough". Possible places where we could consider this are on the edges of Old Woking, Milford, Farncombe, Bramley and Godalming.

30.2. This question relates to land around the villages and is best answered by those who live there – but needs to recognise that failure to provide suitable development sites should not lead to Guildford Urban Area having to accommodate an excess of development instead.

30.3. **Any sites in the Area of Outstanding Natural Beauty should be excluded and should be presumed as unsuitable for any development in the Local Plan.**
CONSULTATION QUESTION 31 – EXPANSION OF VILLAGES

Q31. Significant Expansion of Existing Villages

31.1. The Issues and options document highlights two potential opportunities to extend existing villages:

31.1.1. Possible areas where we could consider this include land between Normandy and Flexford, and land at Send. We have not researched this option in detail, and would need to do further work to assess the Green Belt, and to see if the land is available for development:

31.1.1.1. Land between Flexford and Normandy could possibly provide 2,700 new homes, along with other uses.

31.1.1.2. Land around Send and Send Marsh could possibly provide 2,220 new homes, along with other uses.

31.2. This question relates to land around the villages and is best answered by those who live there – but needs to recognise that failure to provide suitable development sites should not lead to Guildford Urban Area having to accommodate an excess of development instead.
CONSULTATION QUESTION 32 – NEW SETTLEMENT

Q32. Potential for New Settlement

32.1. The Issues and Options Consultation briefly explores the possibility of a new settlement at Wisley Airfield or invites suggestions for alternative locations.

32.2. [to be completed]
Q33. New Park & Ride Facility

33.1. The Issues and Options Consultation lists a number of sites (Appendix D sites 62 to 68) that have previously been considered for a Park & Ride at Worplesdon:
   - 33.1.62. Land at Worplesdon Road, north of Tangley Place (5.7 Ha)
   - 33.1.63. Land at Tangley Place Farm (6 Ha)
   - 33.1.64. Land at Keens Lane (3.97 Ha)
   - 33.1.65. Land at Liddington Hall, Aldershot Road (28.11 Ha)
   - 33.1.66. Land at Westborough Allotments, Woodside Road (0.48 Ha)
   - 33.1.67. Land near Jacobs Well Village Hall (0.23 Ha)
   - 33.1.68. Land between Glaziers Lane and Strawberry Farm, Normandy (5.82 Ha)

33.2. The Guildford Society strongly supports the Council’s principled strategy of having Park & Ride facilities around the town.

33.3. There is a clear need for a facility (or facilities) on the northern side of the town.

33.4. [The dedication of a question to a Park & Ride location (rather than to identify sites for development and then determine what uses might be best where) shows a tactical rather than strategic approach.]

33.5. Park & Ride is a useful part of Guildford’s transportation strategy;

33.6. P&R should be available to serve business and shopper needs

33.7. Locating P&R close to businesses could allow for double journeys (eg. Station to Slyfield to Station)

33.8. See also CONSULTATION QUESTION 41 – OTHER COMMENTS
CONSULTATION QUESTION 34 – POTENTIAL SANG AREA

Q34. Potential SANG Area

34.1. The Issues and Options Consultation seeks sites to provide accessible natural green areas for residents where development is proposed within the Thames Basin Special Protected Area.

34.2. In order to protect Areas of Outstanding Natural Beauty which have otherwise been designated as Potential Development Areas in the GBCS report, it may be appropriate to consider Warren Farm, Burwood Farm (GBCS Parcels E22 and E23) and Part of Blackwell Farm (GBCS Parcel H1) for use as SANG Areas.

34.3. Equally, if Slyfield were to be expanded to the North and South, perhaps parts of those parcels A1, A2 & A4 identified for new commercial and industrial development could also be potential SANG areas.

34.4. One potential benefit of including E22 & E23 as SANG areas is to link Pewley Downs, Warren Farm, Burwood Farm and Merrow Downs as an extended recreation area for Guildford.

34.5. It is worth noting that the Thames Basin Heaths Special Protection Area Avoidance Strategy 2009-2014 (See Section 2.27) is due to have expired before the introduction of the Local Plan.

34.6. This document needs urgent review alongside the Local Plan to ensure that assumptions made in ruling sites as suitable or unsuitable for development remain robust and retain their relevance.

34.7. The review of this document must include an objective assessment of the success of the policy, its achievements and justification for its continuance.

34.8. The review must also provide an impact assessment establishing the limitations it poses on Guildford’s capacity to accommodate development now or in the future. This assessment should form part of the Council’s defence if, as The Guildford Society recommends, it decides to pursue a housing number lower than the ONS or CLG figures.
CONSULTATION QUESTION 35 – BURIAL LAND

Q35. Land for Burial and Cremation

35.1. The Issues and Options document refers to three areas of or options for land that has been identified for possible burials or crematorium use:

35.1.1. Land north of Guildford This land is identified as a potential development area in our research (GBCS land parcel J3).

35.1.2. Land to the east of Tongham, near to Aldershot crematoria Our research (GBCS) records this land is within land parcel K3.

35.1.3. Large scale developments on the edge of Guildford. When we plan large new developments, we will consider whether burial ground is suitable as part of a mixed-use development.

35.2. Areas similar to [Clandon Woods] might be considered suitable for woodland burials.

35.3. Equally, as we are approaching capacity of existing burial grounds, a more active management of older grounds may be required and a full consultation on management methods should be conducted to identify what remaining capacity there is and, if actively managed, what capacity could be made available in existing consecrated or other suitable cemetery grounds.
CONSULTATION QUESTION 36 – ALLOTMENTS

Q36. Provision of Allotments

36.1. The Issues and Options Consultation identifies three options for land for allotments:

36.1.1. Land at Westborough allotments, Guildford (Woodside Road). There is land next to the current allotments that is identified for affordable homes and open space (by the Local Plan 2003).

36.1.2. Land near Jacobs Well village hall. The land is being considered for allotment use by the land owner and the local parish council.

36.1.3. Large scale developments. We can ask for new allotments to be provided on land that is identified for large-scale future development.

36.2. Whilst the options presented seem realistic in isolation, these must not be allocated until a clearer picture has emerged of the numbers of homes Guildford will be required to accommodate – whereupon these sites may be required for development and suitable edge of town alternatives identified for allotments.
CONSULTATION QUESTION 37 – POTENTIAL OPEN SPACE

**Q37. Potential Open Space**

37.1. The Issues and Options Consultation notes the need for more Open Space land and calls for sites.

37.2. The Guildford Society is conscious that Holy Trinity Amenity Group (residents’ association) has suggested that the western part of parcel E23 (GBCS) be designated for ‘Local Green Space’.

37.3. English Heritage has summarised the newly introduced concept of ‘Local Green Space’ as follows:

37.3.1. “The National Planning Policy Framework (NPPF) introduced a new concept of a Local Green Space designation (NPPF 76). This is a discretionary designation to be made by inclusion within a local development plan or neighbourhood development plan. The designation should only be used where the land is not extensive, is local in character and reasonably close to the community, and, where it is demonstrably special, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife (NPPF 77). Policies within the local development plan or neighbourhood development plan for managing development within a Local Green Space should be consistent with the policies protecting green belts within the NPPF (NPPF 78)”.

37.4. The Guildford Society would support the designation of areas as Local Green Space as a principle but (taking NPPF as a whole and recognising the local characteristics – including the proximity to Thames Basin Heaths Special Protection Areas, and the current obligation to provide SANG areas, The Guildford Society would, on balance, prefer these areas to be designated as SANG rather than as Local Green Space (See also Section 34.4).
CONSULTATION QUESTION 38 – ANY OTHER ISSUES

Q38. What other issues should be considered?

38.1. The Guildford Society is very clear in its analysis of the need for a Town Centre Master Plan with further master planning of the University Quarter and Slyfield (see Section 2.5.10).

38.1.1. One major shortcoming in the absence of such master planning at the outset (which may not have been such a major impediment to Plan Making in the past) is that there is no clear information or strategy:

38.1.1.1. that establishes what the CAPACITY for development in key areas might be (resulting in the likelihood that the Council will conclude it needs to redraw the Green Belt Boundary and that the Council will, in all likelihood remove more than is necessary – assuming any Green Belt land is actually required – due to assumptions of building densities and mixes that turn out to be inadequate in reality);

38.1.1.2. that co-ordinates the provision of INFRASTRUCTURE in such a way as to make development feasible, viable and sustainable; in the absence of this it is likely there will be piecemeal developments, nibbling away at the Green Belt, where major rethinking and re-engineering is required (such as the opportunity to regenerate Walnut Tree Close and Woodbridge Meadows for a substantial housing development which has a bearing on the various properties and uses set out in Appendix D of the Consultation Document).

38.1.2. The Guildford Society, echoing the call from Guildford Vision Group for a Town Centre Master Plan, believes that:

38.1.2.1. There remains sufficient time, if outsourced, to complete the stages of a Town Centre Master Plan that would enable any specific reservations and designation of infrastructure routes and essential infrastructure or planning components to be specifically identified in the Final Submission version of the Local Plan:
38.1.2.2. Without such a master planning exercise, any realignment of the Green Belt boundaries proposed in the emerging Draft Local Plan will be open to challenge due to the failure to demonstrate ‘very special circumstances’ (see APPENDIX 2D – Letter from Rt. Hon. Nick Boles MP).

38.2. Analysis of the data in Appendix D shows:

38.2.1. Of the sites from 1-34 in the Appendix where prospects for Residential development are rated as ‘GOOD’, there are 184.31 Hectares which, if developed at an average rate of 40dph would generate 7,366 homes.

38.2.2. The sites are listed as individual pockets for development such that if the sites numbered 3 (1 & 2 Station View), 5 (Land and Buildings at Guildford Railway Station), 10 (Jewsons, Walnut Tree Close), 14 (Land at Walnut Tree Close – including Wey Corner) and even possibly 8 (Guildford Park Car Park) were to be amalgamated, they would total 11.48 Hectares. Taken with the remainder of the Walnut Tree Close commercial sites and the Woodbridge Meadows land (apparently omitted from Appendix D) there would be scope to develop a major new residential quarter, close to the mainline railway station and the town centre – although care in design will be required to protect residents from flooding, probably by building above half-basement car parking.

38.2.3. A summary sheet of Appendix D is at APPENDIX 8 – ANALYSIS OF APPENDIX D.

38.3. Please Note: The Guildford Society has not specifically considered each site or provided any ranking of suitability or comments on proposals since we consider this to be a premature exercise.

38.3.1. The important part of this phase of Consultation should be to establish CAPACITY and NEED and there should be a further stage where the Needs are prioritised and a clear strategy for meeting them should be proposed for consultation.

38.3.2. The analysis of Appendix D – included at APPENDIX 8 – ANALYSIS OF APPENDIX D of this response – is merely an analysis of the data presented and is not (nor is it intended to be) a qualitative assessment of each site.
CONSULTATION QUESTION 39 – DEVELOPMENT CONTROL

Q39. Any other issues for Development Control?

39.1. The Council should carry forward into the review local plan the ‘saved’ policies from the 2003 Local Plan – revised and amended as appropriate i.e. All those policies listed in Annex 1 ‘Saved policies’ of the GBC Core Strategy Consultation 11 March - 29 April 2009, except the seven policies listed as not saved. Of the latter, we think Policy HE11 'Scheduled Ancient Monuments and other sites and Monuments of National Importance' should also be saved.

39.2. In order to provide an appropriate framework for the day-to-day control of development, the revised local plan needs to provide sound and clear development control policies to enable the Council to encourage good quality design but also to enable the Council to reject proposals for development which would be harmful to the character and amenities of the area.

39.3. To that end The Guildford Society would encourage the Council to consider the development control policies which have been adopted by other authorities - especially of other historic towns such as Winchester and Chichester - in order to ensure that 'best practice' is incorporated into the policies of the Guildford Borough Local Plan.
Q40. Delivery Information including CIL

40.1. [to be completed]

40.2. It is clear that delays to the introduction of CIL will cost the Council potential infrastructure revenues and that CIL and a fear of ‘Planning by Inspector’ may join together in encouraging urgency in the Council’s introduction and adoption of a Local Plan.

40.3. The Guildford Society shares these concerns but is also at pains to point out the damage that could be done to our Town and Borough if a poorly-conceived Local Plan were to be advanced simply determined by speed of execution.
Q41. Any other Comments or Suggestions

41.1. The Guildford Society is setting out a selection of its comments from submissions to the South East Plan, which the Guildford Society considers is still valid and should be taken into account in the emerging Local Plan.

41.1.1. Sustainable growth respects the constraints imposed by natural resources. In Guildford, sustainable upward or outward expansion is limited by the geography of a gap town.

41.1.1.1. The Surrey Hills Area of Outstanding Natural Beauty rises to east and west and requires the highest level of landscape protection. The flood plain of the River Wey runs through the town and extends to the north and south.

41.1.1.2. Significant parts of the town lie within the 5km protection zone of the Surrey Heaths Special Protection Area, a European habitat to the NW that we are obliged to safeguard.

41.1.1.3. Harming the character of the historic centre would damage an economic asset.

41.1.1.4. Despite the railways and A3 the transport infrastructure is poor in certain directions, notably to the north west and south east. Congestion on constricted roads would increase damaging the attractiveness of the town to business and commerce.

41.1.1.5. We strongly object to any proposal which would take the annual housing requirement much above 322. Guildford is close to the limit beyond which "town cramming and loss of urban quality" might be expected given the environmental constraints.

41.2. It would be helpful if the geographical and environmental constraints upon Guildford, which affect the potential for expansion, could be set out in more detail to assist the planning of future development.

41.2.1. A gap town in AONB downland:

41.2.1.1. Guildford is squeezed into a narrow gap in the North Downs. The Surrey Hills Area of Outstanding Natural Beauty rises to the west and east. This enjoys the highest level of landscape protection, namely the...
same as a National Park. As well as protecting against inappropriate development on the Downs themselves, the Hobhouse principle applies which specifies that views from the designated downs should be protected in order to safeguard their natural beauty for the nation.

41.2.2. A pinch point in the road network

41.2.2.1. As a consequence of its gap location, Guildford lies at a pinch point in the road network. Its historical roads are narrow and cannot cope with the current level of traffic through the town let alone the increase in traffic and parking that would come. The road network in several directions is limited in its capacity and unlikely to be capable of improvement. Present congestion already threatens the attractiveness of the town to business.

41.2.2.2. Even without an uplift in growth, construction of the Hindhead Tunnel traffic results in Guildford now being a constraint on the capacity of the A3.

41.2.3. Impact on Special Protection Area:

41.2.3.1. Internationally rare heath land lies to the north-west and must be protected from the pressures of development under the European Habitats Directive.

41.2.3.2. With respect to the SPA, as was determined in the case of the Surrey Waste Plan, Appropriate Assessment should be undertaken at the strategic planning allocation stage rather than left to the local or planning implementation stage.

41.2.3.3. The effectiveness of the policy of providing Suitable Alternative Natural Green Spaces to entice recreational users away from the SPA has yet to be fully tested.

41.2.3.4. The Sustainability Appraisal recommended no increase in the housing targets for 5 years until the effectiveness of SANGS in avoiding harm to the SPAs has been established.

41.2.3.5. This suggests it would be inappropriate to propose a significant uplift to the Guildford housing target within the 5km protections zone.

41.2.3.6. This would be especially questionable given that this extra housing would be to meet wider needs, such as London overspill, that could be met in other ways.
41.2.3.7. Also, great care will need to be taken to establish the air quality implications of expansion in the vicinity of the SPA. Guildford struggles to meet air quality standards for nitrous oxides and ozone in the vicinity of the A3 corridor through Guildford and in the town centre.

41.2.3.8. The increased congestion and traffic levels from many thousands of new dwellings in Guildford would risk adverse impact and acidification of the SPA habitat. (In its response to the Surrey waste plan in 2006, GBC objected to Guildford as a site for waste development because “Nitrogen Oxide emissions from an incinerator and associated traffic movements … would add to existing emissions from traffic on A3 trunk road and M25 motorway, giving potential for breach of statutory air quality objectives).”

41.2.4. Historic character

41.2.4.1. The town’s economy benefits greatly from the town’s historic character.

41.2.4.2. There are relatively few sites which have lower intensity uses within the town, usually due to flood risk.

41.2.4.3. Encouragement of too much high density, tall development will undermine the special qualities of the historic core of the town.

41.2.5. Flood Risk

41.2.5.1. A flood plain runs through the town and spreads to the south and north east. It flooded significantly in 1968 and in 2000.

41.2.5.2. A significant proportion of what little less-developed land remains is in the floodplain, at risk of ground water and surface water flooding, or needed for flood water storage.

41.2.5.3. The Borough’s previous Site Allocations consultation process exposed just how significant flood risk is on the few remaining more open sites.

41.2.5.4. On a regular basis, in accordance with the approach advocated in the Thames Catchment Flood Management Plan, land to the north east of Guildford is allowed to flood in order to accommodate water that would otherwise have inundated the town.
41.2.5.5. Guidford exemplifies the strategy in Making Space for Water by respecting the positive water storage role of the natural flood plain.

41.2.5.6. The draft Regional Flood Risk Assessment and Thames Catchment Flood Management Plan both identify the need to retain the capacity of the naturally functioning flood plain to the North East of Guildford and to the South of Woking.

41.2.5.7. This severely limits the potential for development in this area.

41.2.5.8. The sequential test should be applied at the strategic level when housing allocations are being made.

41.2.5.9. It would be unwise, given recent flooding across the country, as well as contrary to sequential test to justify development in the floodplain rather than to identify areas of lower flood risk guided by strategic assessment.

41.2.6. Green Belt:

41.2.6.1. The town is encircled by Green Belt, a designation intended to prevent urban sprawl and coalescence.

41.2.6.2. Significantly, it was created at a time of enormous pressure for post war housing growth.

41.2.6.3. Its very purpose was to prevent us from taking the short sighted option and allowing inappropriate expansion of our towns.

41.2.6.4. If we are now nudging up against the boundaries we set for ourselves, it is time for a new solution, such as new towns or expansion of less constrained towns, not a lifting of the limits we set.

41.2.6.5. The importance of respecting environmental limits has been elevated in the Government’s review of its Sustainable Development Strategy.

41.2.7. Cumulative and combined impacts

41.2.7.1. Insufficient attention is paid to cumulative and combined impacts.

41.2.7.2. The environment is suffering with the current level of development.

41.2.7.3. Given the combination of constraints faced, an increased scale of growth would risk damaging the very qualities that underpin Guildford’s economic success.
41.3. We therefore believe that decisions on where houses should be built should be based on a holistic assessment which takes account of local need, the capacity to accept new housing within existing boundaries, and the existing local infrastructure and environmental constraints. We believe this would produce the optimum sustainable allocation.

41.4. The methodology for this form of analysis is effectively the form of planning used to construct the more robust of the previous Structure Plans, and we suggest that this methodology should be revisited.
The Guildford Society response to GUILDFORD BOROUGH COUNCIL Issues and Option Consultation
November 2013 - DRAFT 2a

APPENDICES
APPENDIX 1 — EMPLOYMENT LAND ASSESSMENT

Employment Land Assessment (‘ELA’)

Approach 1 – Employee Demand

ELA-1. The Report uses an “average estimate of floor space per employee” to calculate the amount of employment floor space that will be needed. From my professional experience, this is a rather blunt instrument with which to carry out exploratory surgery.

ELA-2. New ways of working (referred to in the Report as “Smart Working”) are actually making projected demand rather difficult to estimate. In some business sectors, corporate real estate executives are targeting ratios like one desk per two or more employees for offices; at the same time, retailers adopting a click and collect or home delivery service are typically employing more people in the same footprint.

ELA-3. On the other hand, a major trend towards self-storage facilities means that only very few people are employed in a fairly substantial facility.

ELA-4. At 3.3 (Employee Demand Forecast 1: Economic Downturn Forecast) the forecast was recorded as having been made in Spring 2010 – three years ago and five years before the Local Plan is expected to come into force. The forecast only covers the period to 2026 and so the officers have applied a projection for the balance of five years.

- These analyses are spelt out in Table 3 – 2031 Forecast Adjustments (p24) in which an assessment of employment numbers is made and then applied to a 2009 baseline of typical space use density, leading to a total from Table 4 – Extra Floor Space and Land Required 2006 to 2031 (p25) which actually only estimates additional floor space and not land take.

- This summary of 36,000 square metres of net floor space required (which seems a very low number for a 25-year period under any circumstances) is not translated into the amount of land required to accommodate it in this scenario.

- 3.3.16 says: “We hope the majority of the [General Industrial] land will be re-used for [Business] or [Storage and Distribution] but if the location is totally unsuitable it may be released for other uses such as residential”. It seems odd to have a statement of hope rather than prediction or assertion in a Report such as this.

ELA-5. At 3.4 (Employee Demand Forecast 2: Strong Economy Forecast) the figures were drawn from a 2008 forecast by Experian – even further out of date from the commencement of the Local Plan. This forecast, ranging from 2007 to 2017 has been projected by officers to run through to 2031 (140% longer than the original range). According to this approach, the net additional floor space required (again no land requirement estimate is provided) is 164,000 square metres – a 24.22% increase in the current floor areas summarised in Table 2 (p19). This equates to less than 1.25% per year over the plan period which does not seem to fit with the projected economic growth figures in the TEMPRO report.

ELA-6. At 3.5 (Employee Demand Forecast 3: Mid-range Forecast) officers have derived a mid-range forecast which, for most figures with some rounding, seems to be a mathematical average rather than a mid-range economic forecast. According to this approach the requirement is 99,000 square metres of space and, yet again, no
Approach 2 – Employee Supply Based Forecasts

ELA-7. The principal high level comment to make about this approach is that, whilst it considers the propensity and likelihood for new residents to commute to other employment centres (especially London) it fails to take into account major growth areas such as Aldershot (which is receiving large numbers of troops returning from Germany – with their families including, potentially, working wives). Appendix Q does show data from the 2001 Census and the 2011 Census data is not yet available.

ELA-8. Furthermore, the Retail Demand Study (Roger Tym & Partners) suggests that there is latent demand by 2021 for more than 60,000 square metres of town centre retail space. This will absorb some of the employees but does not appear to have been modelled in this Report.

ELA-9. It may well be that this section of the evidence base will need to be thoroughly reassessed in 2014 upon publication of the 2011 census data to understand the current origins and destinations of economically active members of the community, and having regard to Economic Impact Assessments prepared as part of applications for planning permission for the North Street development.

ELA-10. Figures taken from The Office of National Statistics (ONS) – particularly at Tables 10 and 11 do not take account of the gradual increase of the state pension age being introduced over the life of the Local Plan. This will inevitably increase the number of people of working age and should be factored into a demand-side study such as this.

ELA-11. At Table 15 – Employee Supply Forecast – Extra Floor Space Required 2010 to 2031 – a figure of floor space per worker for the various sectors is set out. This is interesting inasmuch as it suggests that the current space use allocations will subsist for the next twenty years or so – property industry evidence shows that some sectors are trending down (notably offices which shows the largest supply) and some are flat or increasing. What is not clear is what assumptions should be made to accommodate and attract the types of businesses set out in the EM3 strategy – notably, aerospace/space, cyber security, digital economy and pharmaceuticals.
Stage 3 – Comparing the Forecasts with Past trends for Employment Land

ELA-12. Figure 7 (p47) maps the trend lines modelled in the three approaches above for Offices:

![Graph showing trend lines for Employment Land](image)

ELA-13. The ELA Report correctly identifies the vision in the Guildford Borough Economic Strategy (2013-2031) for Guildford to have “world class businesses with capacity to expand…” and “an evolving and vibrant economy”. The ELA, however, sets its recommended provision at between the medium and high levels in Approach One above, rather than look at the previous provision as a target. It does, however, state that the policy will be monitored and the ELA updated on a three-yearly basis.

ELA-14. We would recommend that the provision should be capable of providing more than the target based upon demand but not less than the lower threshold. This should enable tired old buildings and locations to be eliminated and relocated without companies having to leave the area to transform and grow.

ELA-15. It is worth highlighting that the likely incremental Business Rate receipts to Guildford Borough Council from an increase in office floor area of 65,000 to 110,000 square metres would be in the region of £8m to £12m per year by 2031. This could provide a good revenue from which to fund infrastructure improvements.
ELA-16. Figure 8 (p49) shows a similar analysis of industrial floor space, but on this chart the demand and trend are declining.

ELA-17. There is a considerable gap between the trend line and the employee forecast lines and, despite the downward trend and forecast, the ELA is recommending a modest increase in industrial floor space by 20,000 square metres over the Local Plan period. I think this is appropriate and, even more desirable, it is to Guildford’s benefit if the quality of the supply were to be substantially improved.

ELA-18. Once again, the ELA recognises the remarks in the Guildford Economic Strategy, and this time looks to provide scope for a greater amount of space than trend or forecast to help realise the goals of that strategy.

ELA-19. Figure 9 (p52) shows an analysis of Distribution and Storage floor space.

ELA-20. Even more so than for Industrial space, there is a major disparity between the historic trend line and the employee demand lines. This is the third of three charts which has historic trend above employee demand and this would tend to suggest that the employee demand is either underestimated or that Guildford’s economy is close to saturation point. Given the comments about the regional economy and targets for growth, it is reasonable to deduce that the employee demand figures are simply wrong.

ELA-21. The ELA does at least conclude that the target floorspace should be between the trend and demand forecasts at 40,000 - 70,000 square metres.
The ELA Report deduces that the total floor space to be provided needs to be between a range of 105,000 square metres (10.5 Hectares) to 200,000 square metres (20.0 Hectares).

ELA-22. We have modelled the totals for the three property types below, together with the ELA recommended range:

![Graph showing estimated demand for employment floor space]

ELA-23. Clearly, the upper limit of the ELA recommendation does not provide sufficient space to maintain trend and, for a Local Plan relying on or promoting growth, this seems to be a weakness in the Evidence Base. There should be at least enough total space to meet the previous trends and Land Allocation strategies should ensure good quality, connected space is provided to set Guildford’s businesses at or above regional and national norms.

ELA-24. Below we have reproduced the Press Statement issued by Guildford Borough Council on release of the ELA:

- “Employment land study makes case for economic growth
- Today, we have released a study into how much land we need to provide local jobs in the future. The Employment Land Assessment has found there is currently not enough employment land to meet future growth needs in our borough.
- The research is one in a series of evidence-based documents that will support the development of the Local Plan for our borough. Together, the documents look into the availability of land for housing and business growth over the next 20 years.
- “This evidence will help us understand how we can protect local jobs in the coming years and attract new jobs to the area,” says Cllr Monika Juneja, Lead Councillor for Planning and Governance.
- “The new Local Plan must protect existing major employment sites. It also needs to ensure employers have a degree of choice and flexibility when looking for new premises to ensure they can operate efficiently.
- “If we don’t provide enough space for future growth, existing businesses could move out of the borough and new businesses may not be able to establish themselves,” she added. “We need to make sure existing small local companies, emerging businesses and large companies are able to invest in our community.
"We don’t want people to have to leave the borough to find jobs – we want to preserve the vibrant, thriving economic life of our borough, now and in the future."

ELA-25. The ELA, in failing to recommend the provision of employment land at even the same rate as previous trend, far from ‘making the case for Economic Growth’ seems to limit the propensity for Guildford to grow through the Plan period. This does not seem to be the panacea suggested in the press statement.

ELA-26. The ELA does identify a major shortfall in space but does not seek out major opportunities to accommodate large employers or to attract new business to the Borough. The land identified as potential development area is, in general, underwhelming and more should be made of opportunities around Slyfield and the Research Park – probably in conjunction with substantial enhancements to traffic and transportation infrastructure.

ELA-27. In our earlier analysis on SHLAA and SPR we highlighted the opportunity to rethink the northern Urban Area boundary at Slyfield and Jacobs Well. This could help provide sufficient connected opportunity to attract new businesses and enable established businesses to relocate and grow within the local economy. The ELA does look at solutions but does not appear to be sufficiently ambitious or of a sufficient scale to ensure Guildford Borough’s economic strategy can be delivered.
APPENDIX 2 — GREEN BELT & COUNTRYSIDE

Green Belt and Countryside Study (‘GBCS’)

GBSC-1. Generally, it does not seem appropriate to have applied a different methodology to urban edge relative to villages. The village approach seems a more sensible screening methodology.

GBSC-2. On that basis, land around the urban areas would have been screened out due to environmental constraints (eg., Area of Outstanding Natural Beauty (‘AONB’) or Area of Great Landscape Value (‘AGLV’)) should have been eliminated prior to the “sustainability” assessment (which is itself flawed and works to a pre NPPF definition – reflecting the fact that much of this work was carried out before NPPF was introduced).

GBSC-3. To have included figures for land parcels where the AONB designation would presume against development is not only flawed, but invites applications from land owners – and even from Guildford Borough Council, where they are the landowner as at South Warren Farm. In the latter case, Surrey County Council and Guildford Borough Council have been custodians of South Warren Farm on behalf of residents in order to prevent development. The AONB constraint is referred to for that site (Parcel E23) but only rather feebly and without ruling the parcel unsuitable (or even deprioritised) for development.

GBSC-4. The villages where there is a nearby settlement (eg., Jacobs Well or Fairlands close to Guildford Urban Area) are assessed against the village and not the urban area, failing also to evaluate the potential for coalescence rather than assigning the Green Belt designation too high a value.

GBSC-5. No particular effort seems to have been made to identify potential for either a major settlement that could be added within the Green Belt to reduce the need for realignment of the Green Belt around Guildford or to consider a village settlement (such as, say, East Horsley or Fairlands) for significant expansion to become a much larger settlement. This is important as part of the process of ensuring that all options for accommodating the levels of housing proposed in the SHLAA have been considered.

GBSC-6. There seems to be a rather curious approach to segmenting the Green Belt zones around Guildford (in Volume II) whereby radial A roads assume great importance as segment boundaries, whereas railway lines and rivers (far more impenetrable overall) are often to be found not only within the zones but also within the parcels of land subsequently identified. This seems chaotic and inappropriate and should be reviewed because the treatment applied runs the risk of two adjoining parcels (but in separate zones) being afforded significantly different treatment or representing a new Green Belt boundary in due course.

GBSC-7. The parcel sizes seem too small in many places to enable a proportionate view to be taken as to their efficacy in upholding the purposes of the Green Belt. At its extreme, an edge of settlement parcel that is adjoined by another Green Belt parcel would tend to result in a low score (as set out below). The effect
of this approach with parcels that are too small is that it risks institutionalising the erosion of Green Belt for each successive Local Plan until only a small parcel of Green Belt land sits between each settlement. This seems to miss a fundamental point of the Green Belt and, far from preventing urban sprawl, seems to condone it absolutely rather than looking at a one-off ‘permanent’ redrawing of the Green Belt in strategic places.

GBSC-8. For each parcel of land a binary score (0 or 1) has been applied to qualify the parcel according to each of the following four Green Belt purposes:
1. To check the unrestricted sprawl of large built-up areas
2. To prevent neighbouring towns from merging into one another
3. To assist in safeguarding the countryside from encroachment
4. To preserve the setting and special character of historic towns

GBSC-9. There is no score made for the fifth NPPF definition of purpose, namely: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land. This seems to miss out on the scope for, perhaps, displacing uses from urban areas where they can be regenerated – for example, an expansion of Slyfield (to coalesce with Jacobs Well) could facilitate the relocation of commercial activities from Walnut Tree Close and/or Woodbridge Meadows.

GBSC-10. Using the binary approach for Purpose 1 would see a parcel well away from an existing settlement scoring 0 (suggesting it might be suitable for development under Purpose 1) but an edge of settlement parcel would score 1 (tends against development) even though it may be a more sustainable site.

GBSC-11. For Purpose 2 the measure is broadly appropriate but would exclude a parcel where there may be an appropriate choice to make whether to coalesce settlements (eg., Slyfield and Jacobs Well).

GBSC-12. For Purpose 3 the measure is again broadly appropriate but this should again not be allowed to preclude a site where a valid once-and-for-all settlement extension is a plausible and pragmatic option.

GBSC-13. Purpose 4 is a valid measure, assuming no development could enhance the setting and character of the historic settlement (eg., development should not be permitted on the Hog’s Back that is visible from the High Street and forms part of the historic setting of Guildford).

GBSC-14. It should be noted that the Government has not announced any proposals to change the law in relation to protection of the green belt. In a written ministerial statement of 6 September 2012, however, it encouraged local councils to use existing laws to review and tailor the extent of green belt land in their local areas. As an incentive to use these powers, councils who review green belt land in their local plans will have their local plan examination process prioritised.

GBSC-15. It is to be hoped that the review of the Green Belt in Guildford Borough will be carried out with pure objectiveness rather than as a mechanism to accelerate the processing of GBC’s emerging Local Plan.
GBSC-16. At 7.16 GBCS provides criteria against which the lowest scoring green belt parcels are assessed. This includes the walking distance to the nearest Town or District Centre. Since the District Centres are not identified in the SPR, this demonstrates a lack of integration of the Evidence Base. Equally, some of the sustainability criteria are geographic facts, whereas some other categories could actually be created as part of a development. This highlights a challenging issue for interpreters of the Evidence Base where subjective and objective assessments are combined to determine suitability for development, and where no account is taken of improvements that a suitable development could bring about.

GBSC-17. At 7.24 GBCS notes that railway stations are an essential facility in determining the sustainability of a land parcel. There is no indication whether the suggested new stations at Park Barn and Merrow (see IB) have been taken into account in assessing parcels in their particular areas (some sort of conditionality might need to apply but the current absence of the station might affect the deemed sustainability and rule out potential for development).

GBSC-18. As noted in Error! Reference source not found. above, 7.27 of GBCS highlights an issue with the SPA, in that sites that would otherwise be suitable for extension become undevelopable due to the SPA. The current SPA runs to 2014 and, as part of the Local Plan process, Guildford should consider whether it needs to be amended so as not to frustrate the allocation of the most suitable extension sites. This is necessary to ensure that Guildford’s emerging plan is not over reliant upon SPA.

GBSC-19. GBCS generally seems to only include facilities within Guildford Borough, whereas many of the settlements in the Borough are close to the boundaries with other Local Authorities. Any cross-boundary facilities should be allowed to form part of the analysis for each parcel.

GBSC-20. There are some questions about the legitimacy of the testing carried out (highlighted in GBSC Table 5.4 (pp14-17) where many of the criteria are measured against the Guildford Borough Local Plan Proposals Map (Adopted 2003). These include some aspirations marked on the plan which do not appear to have been qualified in terms of whether or not they have been implemented. Equally, other aspects like, say, cycle routes may exist that were not on the 2003 Proposals Plan. There needs, therefore, to be a robust process to upgrade this information against emerging policies and site allocations so as to ensure the data is fit for purpose for the new emerging Local Plan.

GBSC-21. Previous comments have made reference to the criteria applied and have identified anomalies. The next few subheadings and points make reference to these as specific examples of areas for further consideration.
GBSC-22. Areas B2 and B3 score 3 and 4 respectively, excluding them from consideration as suitable for detailed assessment at Stage 3 for potential removal from the Green Belt, whereas the infilling of the area between Slyfield and Jacobs Well may be desirable in the context of, say, better connections to the A3 and Burpham:

- This could be designed so as to help ensure the viability of the small parade of shops;
- Local employment opportunities are already substantial at Slyfield and could be substantially increased in the new Local Plan;
- Access to Guildford town centre is via a designated cycle route which could be accessed by a coalescence or extension.

GBSC-23. Under the Consultants’ scoring method these latter parcels are omitted without detailed assessment at Stage 3, and yet parcel B8 (scoring 2) is included for Stage 3 assessment, despite being between a potential eastward expansion of the Guildford Urban Area (C1 & C2) and proposed infilling at Send.
The AONB is a designation which helps protect the character of Guildford’s surroundings and the Borough as a whole. We note the comments in a recent letter you wrote to Trevor Brook (see 1 below) and we respond in the subsequent numbered paragraphs thereafter:

1. “We are also mindful of recent commentary that the inspector made at the Waverley local plan hearing. The inspector said that environmental assets and designations such as the Area of Outstanding Natural Beauty (AONB) do not establish a blanket ban on housing development. This means that we should consider all land when looking to produce our development strategy as part of our local plan process, using evidence and mindful of the NPPF as a whole. The Inspector’s letter dated 13 June is here. Paras 17 and 18 apply.” (reproduced below):

- **Paragraph 17:** “As such, I would expect your Council to take a positive approach to providing the scale and mix of housing identified in any updated housing needs assessment – consistent with other policies of the National Planning Policy Framework. In the latter context, I do not under-estimate the significance of the Borough’s environmental assets and designations. However, any failure to meet the full, objectively assessed housing needs as a result of constraints arising from those designations would have to be clearly and specifically justified in the terms of the Framework’s policies. As discussed at the hearing, and contrary to the views of some representors, these policies do not set out ‘blanket bans’ on housing development: they should however be read carefully and within the context of the Framework as a whole.” (our emphasis)

- **Paragraph 18:** “In particular, careful consideration should be given as to whether the [Core Strategy (‘CS’)] adequately distinguishes (in terms of both the location of new development and the wording of specific policies) between (1) those national designations to which the Framework attaches particular importance (such as the Green Belt and Area of Outstanding Natural Beauty), (2) those designations
that are not the subject of specific policies in the Framework and (3) the remainder of the Borough. If the location of new development is to be influenced by local landscape designations (as is stated by CS paragraph 6.26), then the purpose and nature of such designations should be justified by the evidence base. It will not be sufficient to rely on a future review of designations in the Development Management and Site Allocation Local Plan (DMSALP). The ‘sound reasons’ for their retention mentioned in CS paragraph 13.17 must be made explicit and subject to testing.” (our emphasis)

2. Analysis of the Waverley Borough Council Core Strategy Inspector Response does NOT preclude the retention of the designated AONB, rather it requires the Evidence Base to robustly provide sufficient alternative sites to obviate the need for including any designated area (such as AONB). It does, on the other hand, require AGLV sites to be included for consideration since the AGLV is a local designation – it is perverse to conclude that, where a site is both AONB and AGLV, its local AGLV designation means its AONB designation is ignored.

3. The consultants, Pegasus, in drawing up the GBCS could NOT have known of the Inspector’s Determination in respect of Waverley since that was only published in June 2013.

4. The GBCS should have provided a separate assessment of AGLV in terms of its contribution to the context and character of Guildford. It should then have assessed parcels in the AONB and AGLV but with a general presumption against development in the strongest possible terms, avoiding any such sites being recommended for removal from the Green Belt without strong justification.

GBSC-24. Parcels E22 & E23 do not appear to be listed in the SHLAA, although it is recommended in GBCS that the Green Belt boundary be redrawn to exclude them both. On the other hand, E24 scores 2 and E25 scores 1 suggesting they should also be considered for potential development – although clearly in the AONB – and, ironically, they would score higher in the GBCS if E22 and E23 were developed.

GBSC-25. These anomalies are illustrative of a major flaw in the Pegasus report and should be addressed as a matter of urgency.
Parcels H1 to H4 (Land west of Surrey Research Park)

GBSC-26. H1 and H2 score 1 and H3 and H4 score 0. The land at H1 and H2 are owned by the University of Surrey and may have been earmarked for University expansion – Research Park, Teaching Campus and/or Student Accommodation. Part of H1 is in the AONB as is part of H3.

GBSC-27. Infrastructure between the Onslow Village area and the town centre is fragile as is the A3 that runs past these sites. Analysis of these areas must, therefore, take into account not only the presence of infrastructure but also its suitability for intensification of use.

GBSC-28. If H1 and H2 were to be taken out of the Green Belt and brought forward for development, H3 and H4 would still, presumably, only score 1 each, suggesting an almost limitless westward sprawl along the north side of the Hog’s Back. This indicates a flaw in the binary scoring methodology when looking at each parcel of land separately rather than the surrounding parcels as a whole.

Parcels J1 to J3 (Stoughton and Worplesdon)

GBSC-29. Parcel J1 scores 3, J2 scores 1 and J3 scores 2. It seems as though there is a clear split in J1 between the western half and the eastern half. The eastern half could probably infill between Stoughton and Liddington New Road. Plot J2 is a finger of green which, if J3 were developed, should probably remain as
Section 8 – Stage 4 environmental capacity

GBSC-30. Pegasus provides a summary of each parcel that GBCS recommends is taken out of the Green Belt – omitting some parcels without specific explanation.

GBSC-31. It should be noted, as a general point, that the use of coloured plans may be prejudicial towards colour blind readers and care should be taken to ensure that no-one is excluded from reading and understanding the specific zoning and restrictions of the parcels of land.

GBSC-32. The summary sheets could usefully set out the scores from the previous exercises in each table so as to place the overall context within the findings.

GBSC-33. The individual plot maps are slightly confusing where two almost adjacent parcels are affected, as the plans only show each successive part in the context of the existing boundary and not also in the context of the other proposed changes. There does not seem to be an overall master plan in the report to show the cumulative impact of all of the recommendations.

GBSC-34. Parcels E22 and E23 are both in an AGLV and the Surrey Hills AONB and should not be taken out of the Green Belt for the reasons previously given. Far better that a significant new settlement in a less sensitive environment should be promoted and excluded from Green Belt ahead of areas that safeguard the character and appearance of the environs of our historic town. This could be achieved, for example, at Wisley Airfield.

GBSC-35. The table of estimated capacity from urban encroachments on the Green Belt and countryside outside the Green Belt should note both the AGLV and AONB designations and should score as zero development on those parcels that fall into AGLV and AONB designations. To do otherwise is to send a signal to developers that those sites might be capable of substantial development and might make planning policies that preclude development indefensible where those parcels have been removed from the Green Belt.

GBSC-36. There should be a broad estimate of the number of residents that might be accommodated in the urban extension areas mooted and that number should be expressed as a percentage of the current Guildford Urban Area population and the Ash & Tongham population respectively. At a rate of, say, 2.15 people per household, there would be a 20% increase in Guildford urban population even before allowing for additional housing numbers on non-green-belt brownfield sites. At the same rate, Ash & Tongham would have a population increase of 30%.

GBSC-37. At 10.2 (Volume III) the GBCS notes that “if (the approach adopted for the urban settlements) was applied to the assessment of villages, a number of the villages, potentially including those which performed well in terms of environmental constraints and sustainability criteria, would not have been considered.” This is a clear indication of the inadequacy of the urban land approach. At 10.7 the Report continues that “the (Potential Development...
Areas) surrounding villages were only considered to be viable if the purposes of the Green Belt would not be significantly compromised, and if the land parcels were not significantly constrained by environmental designations which, if applied to the urban areas, would not have allowed the parcels E22 and E23 to be recommended for removal from the Green Belt.

GBSC-38. As previously noted, consideration should be given to expanding the Guildford Urban Area to meet Jacobs Well by infilling between Slyfield and Jacobs Well and A3. This suggestion introduces the potential to provide further housing around a key employment area, bringing about sufficient critical mass for improved facilities and services, and to recognise that the north of Jacobs Well in particular the woodland to the north of B2 at the boundary with Woking Borough Council represents a long-term defensible green belt boundary. Infilling and coalescing areas such as this should help protect the Downs from development or removal from Green Belt (viz. E22 and E23).

GBSC-39. In general, the GBSC is too conservative in some areas (such as Ripley which has the facilities and services to support more development towards the A3, or Send and Send Marsh which could be coalesced whilst retaining the protection of their outer boundaries, etc) and fails to shine a spotlight on potential new settlements (such as at Wisley Airfield) as an alternative to nibbling away at parts of the Green Belt and broad brush realignment of the Green Belt across other parts of the Borough.

GBSC-40. The schedule of potential development areas should include a measure of the percentage increase in each existing settlement that the PDA represents (see GBSC-36 above). Equally, because the SPR does not set out the typical and variance of housing density in each settlement, there is no way to sense check the housing numbers postulated in the schedule. This is indicative of a wider concern about the Report, namely that it is too generic and does not provide enough guidance as to the merits of retaining the majority of the Green Belt intact whilst carving out sufficient land for a new settlement that could be designed to be sustainable (as defined by GBSC) and could be created with strong defensible green belt boundaries.

GBSC-41. Contrary to appearances, and in the spirit of the generality of the Evidence Base, we are not advocating any specific development but are seeking to ensure there is a proper debate with all reasonable alternatives and that some issues that have been omitted or underplayed can be amended or addressed before a draft Local Plan is issued for consultation based on this Evidence Base.
APPENDIX 2A – Waverley Local plan Inspector’s Report
(eight pages follow)
Dear Mr Parrott

PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED) WAVERLEY CORE STRATEGY (CS) EXAMINATION INSPECTOR’S PRELIMINARY CONCLUSIONS

1. As I explained at the end of the hearing session held in Godalming on 5 June 2013, I am writing to you, first, to give a preliminary view on whether Waverley Borough Council has satisfied the duty to co-operate required by section 33A of the 2004 Act (as amended) and, second, to expand upon my comments made at the hearing about the Plan’s approach to meeting housing needs. While this note is issued without prejudice to any final report that I may prepare, you will see that I have substantial concerns about the Plan’s soundness that may be difficult to resolve within the scope of the present examination.

Duty to Co-operate (DTC)

2. Having read and heard the representations made in respect of this matter, I am able to reach a preliminary conclusion about whether your Council has satisfied the DTC. Given that there is no remedy if the duty has not been met, it is appropriate – indeed necessary – to consider compliance with the DTC early in the examination.

3. As you will be aware, my initial note (20 February 2013) raised a number of concerns about the DTC. These related in particular to the assessment of need within a relevant housing market area and the ability of developments outside Waverley Borough to meet the assessed need.

4. In respect of the first matter, it will be apparent from my later comments that I have serious concerns about the housing needs evidence that supports the CS. Nevertheless, with reference to relevant examination documents and comments (written and oral) from other local planning authorities, I am satisfied that your Council has engaged constructively, actively and on an ongoing basis with the

1 Notably Core Documents CD5/23 and CD5/54.
required bodies in respect of the housing needs assessment process. Such bodies have not raised DTC objections in respect of this matter. In particular, neighbouring planning authorities do not seek to challenge the boundaries of the West Surrey housing market area (HMA) – notwithstanding an acceptance that there is some overlap (in functional terms) between HMA and other neighbouring market areas.

5. The second matter is more problematic. While earlier versions of the CS contained assumptions about the ability of developments in Rushmoor Borough and East Hampshire District to meet Waverley’s needs, such assumptions had not been confirmed by the local planning authorities concerned. Nevertheless, your Council did eventually approach these Councils to explore this matter prior to submitting the CS. You accept that these matters have not been agreed.

6. Nevertheless, I have sympathy with the view of some representors that the wording of CS paragraph 6.15 (to which Rushmoor Borough Council has objected on DTC grounds) can be read as continuing to rely on such developments. Including this information ‘as a matter of fact, to draw attention to these nearby developments, the connection they have with Waverley and their potential to meet some housing needs arising outside these districts’ serves little purpose if formal agreement to off-set part of Waverley Borough’s housing need has not been reached. Furthermore, your Council has decided in any event to maintain the draft CS housing target of 230 dwellings per annum (dpa) despite the lack of such agreement.

7. I have considered carefully whether this matter amounts to a failure to co-operate effectively in the terms of section 33A. However, it seems to me that the objections of other authorities made in respect of the DTC relate more to the final wording of CS paragraph 6.15 than to a lack of engagement between your Council and other local planning authorities on this matter. Indeed, Rushmoor Borough Council stated at the hearing that its objection could be resolved by deleting the reference to the Aldershot Urban Extension from that paragraph. As such, this matter bears more seriously upon the Plan’s soundness than upon the DTC.

8. A further concern discussed at the hearing was the extent to which other neighbouring local planning authorities were asked to assist in meeting Waverley’s housing needs. While a number of these Councils were approached in respect of the DTC, only the two already mentioned plus Guildford Borough Council were specifically asked

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2 For example paragraph 6.27 of the Revised Preferred Options and Draft Policies version (February 2012) – Core Document CD1/14.
3 Core Document CD5/54.
4 Document WBC001, paragraph 3.
5 Document WBC001, paragraph 4.
whether developments within their respective areas had the potential to contribute to housing needs within Waverley Borough.

9. You accepted at the hearing that, with hindsight, it may have been prudent to pose this question more widely. I agree. Nevertheless, I accept that your Council did contact the three authorities with which, on the evidence before me (about which I have more to say below), Waverley Borough’s housing market has the strongest functional linkages. Given that your Council had (incorrectly) assumed that reliance could be placed on developments in more closely-linked Council areas, and bearing in mind that practical application of the DTC was evolving through much of the plan preparation period, I am satisfied on balance that this matter does not amount to a material failure to meet the DTC. Accordingly, and taking into account the other actions described in the Council’s DTC topic paper, I see no reason to reach a conclusion that the duty has not been complied with.

Meeting Housing Needs

Needs Assessment

10. It is a requirement of the National Planning Policy Framework (paragraph 159) that local planning authorities should have a clear understanding of housing needs in their area. While the submitted evidence base seeks on one hand to demonstrate that the 2009 Strategic Housing Market Assessment (SHMA) remains robust, it was apparent from your comments at the hearing that your Council does not itself accept that the SHMA accurately describes the full, objectively assessed housing needs of the housing market area, as required by paragraph 47 of the Framework.

11. In particular, you referred to various factors that have changed in the intervening period since the SHMA was prepared: these include the availability of more up-to-date population and household projections, newer employment evidence and changes to the eligibility criteria for housing waiting lists. This list is not exhaustive. You went on to suggest that the total housing need (for the Borough) amounted to some 300-450 dpa. This is a significant departure from the SHMA figure of 706 dpa (affordable and market housing), which is also set out in CS paragraph 6.11.

12. As such, it appears on your own terms that the 2009 SHMA is insufficient to provide the up-to-date assessment of housing needs required by paragraph 47 of the Framework. Such an assessment should properly be undertaken within the context of a SHMA, the preparation of which is itself a requirement of the Framework (paragraph 159). This requires a more considered assessment of housing needs than a simple reliance on demographic and household data and, importantly, requires such consideration to take place within

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6 Core Document CD5/54 and the Council’s comments at the hearing.
7 For example at WBC Matter 2 statement paragraph 2.1.14.
the context of the housing market area. As I explained at the hearing, an evidence base that solely refers to demographic and other changes within Waverley Borough, without consideration of the market area as a whole, is unlikely to be sufficient. For these reasons, I can give little weight to the housing needs figure that you quoted at the hearing.

13. While I would not wish to pre-empt the outcome of any revised housing needs assessment exercise, I would draw your attention to the other requirements of paragraph 159 of the Framework. These include the need to take account of migration and demographic change. As such, realistic assumptions in respect of future migration patterns would be required. Given the evidence that is already before me about the relative lack of containment within the West Surrey HMA, any scenario based upon zero net-migration (as included in your Population Topic Paper and your suggested modifications [January 2013]) would need to be robustly justified.

14. Taking these factors together, it is therefore unlikely that I could reach a finding of soundness on the basis of the housing needs assessment evidence that is before me. A new SHMA is required. However, this would require your Council to work with other authorities – given that the HMA crosses administrative boundaries (see paragraph 159 of the Framework) – as well as with other stakeholders. As such, I am concerned that it may not be practicable or realistic to undertake and complete this exercise within the context and timescale of the present examination. If it is not possible to do this, then your Council should consider withdrawing the Plan.

Core Strategy Housing Total

15. During the hearing, I gained the strong impression that your Council is unwilling, as a matter of principle, to depart from the 230 dpa housing total that is set out in the CS. For example, as already discussed, this figure was not revisited when your previous assumption that reliance could be placed upon developments in neighbouring authorities proved to be incorrect.

16. If my impression is correct, then I must advise that continued reliance on a figure that is derived from the South East Plan (SEP) process is unlikely to result in a finding of soundness. The planning policy context has changed substantially and, as already discussed, you have accepted that the evidence base applying at the time of the SEP is out of date. As I emphasised at the hearing, the requirement of the National Planning Policy Framework (paragraph 47) is that the Local Plan should meet the full objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework. Seeking

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8 Core Documents CD4/36 and CD1/02 respectively.
9 Furthermore, your Council was already seeking to depart from the actual SEP figure of 250 dpa.
to meet such needs is part of the soundness test of being positively prepared (paragraph 182 of the Framework).

17. As such, I would expect your Council to take a positive approach to providing the scale and mix of housing identified in any updated housing needs assessment – consistent with other policies of the National Planning Policy Framework. In the latter context, I do not under-estimate the significance of the Borough’s environmental assets and designations. However, any failure to meet the full, objectively assessed housing needs as a result of constraints arising from those designations would have to be clearly and specifically justified in the terms of the Framework’s policies. As discussed at the hearing, and contrary to the views of some representors, these policies do not set out ‘blanket bans’ on housing development: they should however be read carefully and within the context of the Framework as a whole.

18. In particular, careful consideration should be given as to whether the CS adequately distinguishes (in terms of both the location of new development and the wording of specific policies) between (1) those national designations to which the Framework attaches particular importance (such as the Green Belt and Area of Outstanding Natural Beauty), (2) those designations that are not the subject of specific policies in the Framework and (3) the remainder of the Borough. If the location of new development is to be influenced by local landscape designations (as is stated by CS paragraph 6.26), then the purpose and nature of such designations should be justified by the evidence base. It will not be sufficient to rely on a future review of designations in the Development Management and Site Allocation Local Plan (DMSALP). The ‘sound reasons’ for their retention mentioned in CS paragraph 13.17 must be made explicit and subject to testing.

19. Equally, the approach in respect of international nature conservation sites should accord with relevant legislation and policy – including SEP Policy NRM6, with which general conformity is still required. The statement of common ground between your Council, Natural England and the RSPB is noted and welcomed, although some outstanding issues remain upon which I would wish to hear discussion.

20. I note that your Council’s justification for not undertaking a Green Belt review derives in part from its view that housing sites outside the Green Belt were available to meet the policy CS2 housing target. However, given that this target was itself explicitly influenced by the presence of constraints including the Green Belt, this appears to be a circular argument. While the SEP identified no requirement for a Green Belt review in Waverley Borough, the relevant SEP policies have been revoked. If the Council wishes to maintain its opposition to a Green Belt review, then such a stance would need to be justified in the

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10 See paragraph 113 of the Framework.
11 Such as the Strategic Gap and the Areas of Strategic Visual Importance.
12 WBC Matter 8 statement, paragraphs 8.1.8-8.1.9.
13 WBC Matter 2 statement, paragraphs 2.2.23-27.
context of the Framework’s policies, as discussed above. However, if a Green Belt review were to be considered then this has the potential to amount to a fundamental change to the Plan’s strategy that could not be accommodated within the present examination.

21. A number of developers have put forward specific housing sites for consideration. I make no comment on the merits of these sites: detailed site allocation is a matter for the DMSALP. Nevertheless, if your Council were to maintain a position of providing less housing than required by a revised needs assessment, it would – in line with paragraph 47 of the Framework – need to demonstrate why the development of such sites would be inconsistent with the policies of the Framework.

22. In that context, the Council’s approach (in Core Strategy policy CS2) of seeking to allocate ‘reserve’ greenfield sites in excess of the intended level of greenfield housing provision appears inconsistent with its justification for an essentially capacity-based housing target. If such sites can be brought forward for development consistent with the Framework’s policies then this should be considered in principle and signalled as such in the CS (although I accept that their actual allocation could appropriately be deferred to the DMSALP). If however their development would conflict with the Framework’s policies then it is hard to see how they could form an effective reserve in any event.

23. As you are aware, I have raised concerns that the level of housing need set out in the 2009 SHMA was not adequately tested through the Sustainability Appraisal (SA) process – both in terms of the numbers that were assessed (which fell substantially short of the 706 dpa figure set out in the SHMA) and the broad-brush nature of the assessment itself. A thorough and effective SA that takes into account the output of any revised housing needs assessment would clearly be required, along with accompanying public consultation and Habitats Regulations Assessment. While it is possible in principle to prepare an ‘addendum’ SA report to address changes to a Local Plan (such as the ‘main modifications’ recommended by an Inspector), I am concerned that the above-noted comments imply a more substantive revisiting of the overall Plan strategy. This would be outside the scope of the present examination.

24. As discussed at the hearing, it is necessary that any housing target should contain sufficient flexibility to ensure that the target will actually be delivered. As discussed at the hearing, the approach of allocating only enough housing land to meet that target exactly risks creating a shortfall if any of the underlying assumptions fall short or if sites do not come forward as expected. I note that there was some disagreement at the hearing about the present availability of a 5 year housing land supply: ideally, it would assist if common ground could be reached on this matter.

25. In addition, I am concerned that the Council’s evidence in support of the Plan’s windfall assumptions may be insufficiently robust,
particularly in respect of the allowance that has been made for the
changed national policy stance in respect of the status of private
residential gardens. Your view that ‘the scope to release additional
greenfield land provides the necessary flexibility’ in respect of that
matter\(^{14}\) appears at odds with the requirement of paragraph 48 of the
Framework that ‘compelling evidence’ should be available to support
any windfall allowance. Given that windfall developments account for
a substantial part of your Council’s overall housing supply figures,
failure to provide such robust evidence could amount to a serious
failing of soundness.

26. Although not discussed at last week’s hearing, you will also be aware
of my concerns about the CS’s potential lack of compliance with the
Planning Policy for Traveller Sites (PPTS). These are set out in more
detail in my note of 20 February 2013.

27. I note that a statement of common ground has been agreed between
your Council and Hampshire and Surrey County Councils in respect of
transportation matters. While this is welcomed, it does not appear
that Hampshire County Council’s objection has been fully overcome –
although this is not entirely clear from the way that the statement has
been presented (unlike other statements, it does not have an
‘outstanding issues’ section). If an outstanding objection remains in
respect of this point then it would need to be explored in more detail.

Conclusions

28. The comments set out above imply a significant amount of additional
work. This includes the reassessment of housing needs in line with the
Framework’s requirements, the proper testing of alternatives through
the SA process, a reconsideration of the Borough’s capacity to
accommodate new housing in the light of the Framework’s policies, a
reassessment of the present approach to ‘additional’ greenfield sites
and the demonstration of a robust housing supply. All of the above
would require to be subject to public consultation.

29. Taken together, these matters are both so significant and so central to
the Plan’s overall strategy that I am concerned that it may not be
possible to consider them appropriately within the context of the
present examination – which, as previously advised, is based upon the
August 2012 version of the Plan that was subject to formal public
consultation. It would be a significant waste of time and resources if
such work was undertaken only to result in modifications that were so
substantial that they could not be reasonably considered in the context
of the present examination. Equally, any additional work would need
to be carried out within an acceptable timescale: a substantial delay
would create considerable uncertainty within the examination process
for those who have submitted representations at the publication stage.

\(^{14}\) WBC Matter 2 statement, paragraph 2.3.15.
30. As such, it seems to me that there are three alternative courses of action:

(1) I proceed to write my report on the basis of the evidence that is already before me (although in such circumstances I would need to consider whether further hearings would be required). It will be apparent from the above that this is unlikely to result in a finding that the Plan is sound; or

(2) Your Council undertakes the above-noted additional work if it feels that this could be accommodated (1) without fundamentally altering the Plan’s spatial strategy, (2) without prejudicing the preparatory work and public consultation that has already been carried out and (3) within a realistic timescale. As already discussed, this option carries a substantial risk that such work could be wasted if it were to, on the one hand, result in the Plan effectively being rewritten or, on the other hand, fail to properly address the concerns described in this letter; or

(3) Your Council withdraws the Core Strategy, carries out the work described above, republishes the Plan for consultation and then submits it for formal examination. Given my comments on the previous two options, and with regret, I suggest that this may well be the most appropriate course of action.

31. I therefore ask your Council to carefully consider how it wishes to take matters forward in the light of this note, and to advise me (via the Programme Officer [PO]) of its response as soon as possible. This note, along with your response, should be made available on the examination website. If you have any queries on the above, please let me know via the PO.

Yours sincerely

M J Hetherington

INSPECTOR
APPENDIX 2B – Mole Valley – Cherkley Decision (extracts)

(24 pages of 56)
IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION
ADMINISTRATIVE COURT

Royal Courts of Justice
Strand, London, WC2A 2LL

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION
ADMINISTRATIVE COURT

Case No: CO/13600/2012

Neutral Citation Number: 2013 EWHC 2582 (Admin)

Before:

MR JUSTICE HADDON-CAVE

Between:

THE QUEEN on the application of
CHERKLEY CAMPAIGN LIMITED
- and -
MOLE VALLEY DISTRICT COUNCIL
- and -
LONGSHOT CHERKLEY COURT LIMITED

Claimant
Defendant
Interested Party

Douglas Edwards QC and Sarah Sackman (instructed by Richard Buxton Solicitors) for the Claimant
James Findlay QC (instructed by Sharpe Pritchard) for the Defendant
Christopher Katkowski QC and Robert Walton (instructed by Berwin Leighton Paisner LLP) for the Interested Party

Hearing date: 6th, 7th & 10th June 2013

APPROVED JUDGMENT
MR JUSTICE HADDON-CAVE:

“The planning system…is created as an instrument of government, as a means of restricting private land use rights in the interests of the community as a whole.” (Sir Malcolm Grant, Urban Planning Law, 1982 edition, p. 6).

INTRODUCTION

Preamble

1. This case engages the fundamentals of planning law. By its origins, philosophy and principles, planning law is concerned with the regulation of the private use of land in the interests of the community as a whole. As Sir Malcolm Grant said in his seminal book, Urban Planning Law (1982 edition at p. 6): “The planning system… is created as an instrument of government, as a means of restricting private land use rights in the interests of the community as a whole.” Sir Malcolm Grant also observed that planning law prescribes the procedures - or sets the battle lines - for the resolution of conflict over land use “between the interest of private property and the prevailing “public” or “community” interests” (ibid, p. 1). His words are as relevant today as they were 30 years ago.

2. This case concerns a conflict between private developers and public campaigners. The developers seek planning permission to develop exclusive private golf and hotel facilities in the scenic setting of the Surrey Hills. The campaigners wish to prevent such a development in protected landscape of national importance. Much of the legal argument revolved around whether a “need” for further golfing facilities could be demonstrated as required by the policy matrix. The developers argued that proof of private “demand” for exclusive golf facilities equated to “need”. This proposition is fallacious. The golden thread of public interest is woven through the lexicon of planning law, including into the word “need”. Pure private “demand” is antithetical to public “need”, particularly very exclusive private demand. Once this is understood, the case answers itself. The more exclusive the golf club, the less public need is demonstrated. It is a zero sum game.

3. Further, planning law decision-making is a process informed by policy; and the courts employ pragmatism and common sense when interpreting it (see Lindblom J in Cala Homes (South) Limited v. Secretary of State for Communities & Local Government [2011] EWHC 97 (Admin) at paragraph [138]).

Judicial review

4. By these judicial review proceedings, Cherkley Campaign Limited (“the Claimant”) challenges a decision by Mole Valley District Council (“the Council”) to grant planning permission to Longshot Cherkley Court Limited (“Longshot”) on 21st September 2012 to develop Cherkley Court and Cherkley Estate, near Leatherhead in Surrey, into exclusive golf facilities together with a hotel, health club and spa. The Claimant contends that the Council’s decision was legally flawed, contrary to planning policy, irrational and should be quashed.
THE FACTS

Cherkley Court and Estate

5. The Cherkley Estate is in the Surrey Hills. It totals approximately 375 acres, including 195 acres of farmland. It comprises a main house, Cherkley Court, and a secondary house, Garden House, together with substantial outbuildings and cottages, all set in parkland and woodland. **The whole estate is within the Surrey Hills Area of Great Landscape Value and part is also within the Surrey Hills Area of Outstanding Natural Beauty.** The Estate is adjacent to the Box Hill Estate, a National Trust property, and the Mole Gap to Reigate Escarpment, a Special Area of Conservation. The Estate includes a large field of uncultivated chalk grassland known as the ‘40-Acre Field’, which is a UK Priority Biodiversity Action Plan Habitat and has the designation criteria of a Site of Nature Conservation Importance. 40-Acre Field (on which it is proposed to put 5 golf holes) abuts an adjacent EU classified Special Area of Conservation and Site of Special Scientific Interest. The whole Estate is within the Metropolitan Green Belt.

Cherkley Court and Lord Beaverbrook

6. Cherkley Court is a Grade II listed building and is located to the south-west boundary of the estate. It has an interesting and distinguished history. It was originally built in the late 1870s, but had to be re-built after being severely damaged by fire in 1893. In 1911 it was purchased by the Canadian businessman, Max Aiken (later Lord Beaverbrook). It became his family home until his death in 1964 and remained his widow’s home until her death in 1994. Garden House became the home of Lord Beaverbrook’s son, Sir Max Aiken, in the late 1950s.

7. In the 1960s, title in Cherkley Court passed to a charitable trust, the Beaverbrook Foundation. In 1984, the family sold off Garden House and the Estate to a Chinese businessman, but retained Cherkley Court itself. In 1998, the trust re-purchased Garden House and the Estate and re-united it with Cherkley Court again. The Beaverbrook Foundation then carried out extensive renovations to Cherkley Court and the Estate and opened its formal grounds to the public, pursuant to planning permission granted on 30th October 2003. On 7th June 2010 the Beaverbrook Foundation obtained planning permission for Cherkley Court to revert to a single family dwelling and put it up for sale for £20 million.

8. Two private bidders wished to use Cherkley Court and Estate as a private residence but were outbid by Longshot who purchased the Cherkley Estate in April 2011. In July 2011, Longshot also purchased the adjoining Micklenam Downs Estate to the south comprising an additional 18.5 acres (also within the Surrey Area of Outstanding Natural Beauty). This acquisition brought the total planning application site up to approximately 394 acres.

Longshot’s planning application

9. In October 2011, Longshot applied to Mole Valley District Council for planning permission to develop Cherkley Court and the Estate into a hotel and spa complex together with an 18-hole golf course. The application (MO/2011/1450) was lodged under cover of a letter dated 28th October 2011 from Longshot’s planning
advisors, Planning Perspectives LLP. The application sought planning permission in the following terms:

“The use of Cherkley Court, and its existing associated buildings as a hotel comprising guest accommodation, health club, spa and cookery school. Provision of additional floorspace to accommodate further guest rooms, underground plant and leisure uses, including an outdoor pool. Provision of an 18 hole golf course, practice facilities, clubhouse and maintenance area (underground)...”

10. Longshot also applied for listed building consent to make alterations to Cherkley Court, but this is not part of the present challenge. Longshot submitted detailed evidence with its main planning application, including reports from its golf club consultants, 360 Golf, and various environmental, water and other technical consultants. The cost of the scheme was said to be in the region of £45 to £50 million.

11. The proposal required a departure from the Mole Valley Local Plan and Core Strategy, and was advertised as such.

Objections
12. The application proved highly controversial. There were numerous objections to the proposal to turn the Cherkley Estate land on the Surrey Hills North Downs into a golf course and the proposal to turn Cherkley Court into a hotel and spa complex. Objectors included Campaign to Protect Rural England (Surrey Branch), Campaign to Protect Rural England (Mole Valley Branch), Friends of Box Hill, Leatherhead Residents Association, Micklenham Parish Council, National Trust (Polesden Lacey South East Office), Surrey Hills Board, Butterfly Conservation and Surrey Botanical Society.

Summary of designations affecting the application site
13. The planning and environmental designations and policies affecting the application site are legion. They can be conveniently listed in full and summarised as follows:

(1) The whole application site lies within the Surrey Hills Area of Great Landscape Value (“AGLV”). This is a county-level designation which recognises its “high quality landscape” (Core Strategy, paragraph 6.4.5.).

(2) Part of the site is within the Surrey Hills Area of Outstanding Natural Beauty (“AONB”). This is a national designation which confers the “highest level of protection in relation to landscape and scenic beauty” (National Planning Policy Framework (“NPPF”), paragraph 115).

(3) The entire site is within the Metropolitan Green Belt.

(4) The site is adjacent to the Box Hill National Trust Estate.

(5) The site is adjacent to the Mole Gap to Reigate Escarpment Site of Special Scientific Interest (“SSSI”), a nationally important site. The SSSI is also a Special Area of Conservation (“SAC”), indicating European importance for
nature conservation. There is an 800 metre buffer zone associated with the SAC which covers much of the southern half of the site.

(6) The site includes Cherkley Wood, which is a Site of Nature Conservation Importance ("SNCI"). This is a local designation. 40-Acre Field comprises chalk grassland which is a habitat identified as Biodiversity Action Plan Priority Habitat and is considered to meet the requirements for a designation as an SNCI. The application site falls within a Biodiversity Opportunity Area ("BOA").

(7) A significant part of the parkland within the site comprises Areas of High Archaeological Importance and includes designated archaeological sites.

(8) The site includes Grade II listed buildings and several curtilage-listed buildings. Cherkley Court is described as “a significant listed building within Mole Valley and forms an important part of the nation’s cultural heritage”.

(9) The site includes Scheduled Ancient Monuments.

**Applicable policy**

14. The primary policy relevant to this planning application was REC12 of the Mole Valley Local Plan (set out below). There were also other policies germane to development in an AONB and AGLV and the Green Belt which contained material considerations. These are dealt with in more detail later below.

**Mole Valley Local Plan**

15. The section of the Mole Valley Local Plan relating to golf courses is referred to as REC12 and comprises eleven paragraphs (numbered 12.70 to 12.81) and a box of text, set out as follows:

**“GOLF COURSES”**

12.70 There are seven established golf courses in the District concentrated principally around Dorking and Leatherhead. In the Newdigate area a new course has been opened in recent years and another permitted. More generally this part of Surrey is very well served with golf courses. According to the recognised standards of provision there is no overriding need to accommodate further golf courses in the District.

12.71 In considering proposals for new courses, the protection of the District’s Green Belt and countryside will be of paramount importance. In this regard it will be important to ensure that a proposal is compatible with retaining and where possible enhancing the openness of the Great Belt and rural character of the countryside. Applicants proposing new courses will be required to demonstrate that there is a need for further facilities.

12.72 New courses are likely to have an impact on the District’s landscape because of their extensive size, formal appearance, considerable earth works and new buildings. The Council will seek to ensure that proposals for golf courses do not reduce the distinctiveness and diversity of the District’s landscape. The Council is particularly concerned about the effect on the special landscape qualities of the Surrey Hills Area of Outstanding Natural
environmental safeguards, having regard also to the conditions set out in the decision notice and to the Section 106 Agreement, to outweigh any concerns.”

THE CHALLENGE

28. The Claimant’s lodged their challenge by way of judicial review on 17th December 2012. The challenge was originally brought on seven grounds (to which an eighth ground was subsequently added):

(1) **Ground 1**: breach of Green Belt policy requirements;
(2) **Ground 2**: failure to demonstrate “need” for further golf facilities in breach of Policy REC 12;
(3) **Ground 3**: breach of policies on protected landscape;
(4) **Ground 4**: failure to give adequate reasons
(5) **Ground 5**: failure to have regard to the adequacy of water resources in breach of Policy ENV68;
(6) **Ground 6**: failure to have regard to impact on European Protected Species
(7) **Ground 7**: failure to consider the optimum viable use of Cherkley Court as a residential dwelling; and
(8) **Ground 8**: failure to take into account a 2010 Agreement regarding the ‘Glass House Cottages’.

Permission for judicial review and interim injunction

29. On 24th April 2013, Collins J granted the Claimant permission to apply for judicial review on three grounds; **Ground 2** (‘demonstration of “need”’), **Ground 3** (‘landscape’), and **Ground 5** (‘adequacy of water resources’). He refused permission was refused on **Ground 1** (‘Green Belt’), **Ground 4** (‘failure to give adequate reasons’), **Ground 6** (‘inadequacy of ecological information’), **Ground 7** (‘heritage considerations’) and **Ground 8** (‘failure to take into account a 2010 agreement regarding the Glass House Cottages’). He directed that the Claimant was entitled to apply to renew any of these latter grounds before the trial judge on notice. The Claimant applied before me to renew its challenge on **Ground 1** and **Ground 8**, both of which were put in terms of the Council’s alleged unlawful approach to Green Belt policy. **Ground 6** and **Ground 7** were no longer pursued. **Ground 4** was no longer pursued as a separate ground of challenge, but inadequacy of Reasons formed part of Claimant’s challenges generally. I heard **Ground 1** and **Ground 8** on a ‘rolled-up’ basis.

30. On 26th April 2013 Collins J granted an interim injunction restraining Longshot from carrying out construction works at the site save for certain prescribed permitted works. This followed an earlier injunction granted by Simon J on 26th March 2013 and subsequently varied by Holman J on 16th April 2013..

31. I consider each of the Grounds in detail below. I turn first, however, to deal with a challenge by Longshot to the Claimant’s standing (**locus standi**).
Green Belt and (d) the Mole Valley Local Plan. Each of these protective policies carries with it a ‘policy matrix’. To a significant degree these policy matrices overlap and have common themes. The question of “need” features expressly or implicitly as a policy consideration in several of these policy matrices, not just in paragraph 12.71 of the supporting text to REC12. For instance, paragraph 116 of the NPPF which protects AONB, requires an assessment of “the need for the development” and “any national considerations” to justify encroaching on AONB. PPG2, which protects the Green Belt, requires proof of “essential facilities” to justify encroachment on the Green Belt. The word “need” appears in the NPPF in terms redolent with public interest. It is a general term which would apply to any development.

93. In my view, the sum of these policy matrices is (even) greater than the parts. They must be viewed holistically and read as a whole. The corollary of the multi-elevated or protected status of this land is that an applicant faces not merely the individual policy hurdles, but an altogether higher cumulative fence to cross.

Dictionary definition of “need”
94. The word “need” in Old English was ‘nēd’ or ‘nēd’ (noun) or ‘nēdiun’ (verb) and is of Germanic origin. The Concise Oxford English Dictionary lists three potential meanings of “need” as a verb: (1) ‘require (something) because it is essential or very important rather than just desirable’; (2) ‘expressing necessity or obligation’; (3) ‘be necessary’. The Concise Oxford English Dictionary lists three potential meanings of “need” as a noun: (1) ‘circumstances in which something is necessary, necessity’; (2) ‘a thing that is wanted or required’; (3) ‘the state of lacking a basic necessity such as food, or of requiring help’. Children sometimes use the word “need” infelicitously and say ‘I need...’ when they really mean ‘I want...’. The spectrum of potential meaning of the word “need” is potentially wide: it stretches from “necessity” through “required” to merely “desired”.

95. Words, however, take their colour and meaning from their general and specific context. The general and specific context in this case is particularly important.

General context - planning law
96. The general context is, of course, the broad horizon of planning law itself. As presaged at the beginning of this judgment, the raison d’être of planning law is the regulation of the private use of land is the public interest (see paragraphs 1 and 2 above).

Specific context - REC12
97. The specific context is the policy relating to the golf courses. A close textural analysis of paragraphs 12.70 to 12.81 and REC 12 is useful. Two themes emerge from these provisions. First, an explicit recognition of the ample sufficiency of golf courses already in the Mole Valley District. Second, the importance of protecting the special rural landscape in the District from the impact of further golf courses developments. These two themes emerge from the following passages in particular. Paragraph 12.70 spells out the actual number of golf courses in the District and expresses the clear view “... this part of Surrey is already very well served with golf course”. Paragraph 12.70 goes on to conclude:
Conclusion on ‘directing away’

130. In my judgment, for the reasons given above, the Council majority further erred in law in that they failed, properly or at all, to consider the policy requirement or material consideration in paragraph 12.72 that the golf course and its associated facilities could be provided in another location where the landscape was less sensitive and important. Accordingly, the Decision granting Longshot planning permission to develop Cherkley was unlawful and should be quashed on this further ground.

GROUND 3 – BREACH OF POLICIES ON PROTECTED LANDSCAPE

131. I turn to Ground 3, under which the Claimant contended that the Council majority failed properly to apply the policy tests in respect of the impact of Longshot’s proposed development on protected landscape.

Claimant’s submissions

132. Mr Edwards QC, on behalf of the Claimant, raised four arguments under Ground 3.

(1) First, the Council majority failed properly to construe and apply: (i) the NPPF, paragraphs 115 and 116, and in particular the “exceptional circumstances” and “public interest” tests in paragraph 116 and, in the event that members considered those paragraphs were not engaged (contrary to the views of the planning officers), no adequate summary of reasons were given for this conclusion; (ii) the requirement that new golf courses be “directed away from the AGLV and AONB” as required by para.12.72; and (iii) the requirement of policy REC12 that new golf courses will only be permitted if they are “consistent with the primary aim of conserving and enhancing the existing landscape” in that their conclusion that “the landscaping and mitigation measures contained in the application were sufficient to ensure that the overall landscape character would not be compromised” is not capable of satisfying the requirement to “conserve and enhance the existing landscape”. As such, the Council majority failed to have regard to those policies as material considerations and to determine the application in accordance with the development plan as required by section 70(2) of the 1990 Act and section 38(6) of the 2004 Act.

(2) Second, alternatively, if the majority of members did properly construe those development policies and the NPPF, there was no rational or discernable basis for their decision in that all the evidence pointed to a different conclusion.

(3) Third, in any event, the decision of the Council majority that those policies were met, given the information before them, was irrational in that the decision simply “does not add up” in the Sedley J sense.

(4) Fourth, the Council majority gave no adequate summary of their reasons for the decision in this respect as required by Article 31(1)(a) of the 2010 Order
particularly given the range of information to the contrary and the high level of importance given to AONB and AGLV in planning policy.

Council’s and Longshot’s response on Ground 3
133. Mr Findlay QC and Mr Katkowski QC submitted in response in summary as follows: (i) there was no “major development” within the AONB and paragraph 116 of NPPF did not apply; (ii) as a matter of construction, the last criterion in REC12 (paragraph [C]) only requires absence of harm: the “and” is disjunctive; and, in any even, does not preclude the conclusion that “the landscaping and mitigation measures contained in the application were sufficient to ensure that the overall landscape character would not be compromised”; (iii) in any event, members found there were landscape “benefits” to the proposed scheme; (iv) members were quite entitled to form their own view after their site visit and the Council majority view could not be said to be perverse (c.f. Sullivan J in Newsmith Stainless Ltd (supra)); (v) the Claimant was wrong to assert that “all the evidence” pointed to a different conclusion to that reached by the Council majority; there was evidence of landscape enhancements flowing from the scheme; and (vi) the Reasons on the landscape issue were full.

Policy framework

Landscape protecting policies - NPPF
134. Cherkley Court is situated within in protected landscape comprising an AONB and AGLV (see above). Such landscape areas are protected by Section 11 of the NPPF which provides as follows:

“11. Conserving and enhancing the natural environment
109. The planning system should contribute to and enhance the natural and local environment by:
• Protecting and enhancing valued landscapes...
115. Great weight should be given to conserving the landscape and scenic beauty in...[AONB], which have the highest status of protection in relation to landscape and scenic beauty. ...
116. Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated that they are in the national interest. Consideration of such application should include an assessment of:
• The need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
• The cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
• Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.”

135. The approach laid down by the NPPF in relation to protected landscapes is, therefore, straightforward:

(1) Local planning authorities must give “great weight” to conserving the landscape and scenic beauty in AONB etc.
Local planning authorities should refuse planning permission for major developments in designated areas except in “exceptional circumstances” and where they are in the “national interest”.

Consideration of what amounts to “exceptional circumstances” and “national interest” will include assessment of (a) the “need” for the development, including any national considerations, and its impact upon the local economy; (b) the opportunity for developing elsewhere, or meeting the “need” in some other way; and (c) any detrimental effect and the extent to which that could be moderated.

Mole Valley Local Plan
136. The approach to protected landscapes is re-enforced by paragraph (C) of Policy REC 12 of the Mole Valley Local Plan which provides:

“Proposals for new golf courses should be designed to respect the local landscape character. New golf courses in the Surrey Hills Area of Outstanding Natural Beauty and the Area of Great Landscape Value will only be permitted if they are consistent with the primary aim of conserving and enhancing the existing landscape.”

137. The supporting text provided in paragraph 12.72 which I set out again for convenience:

“12.72 New courses are likely to have an impact on the District’s landscape because of their extensive size, formal appearance, considerable earth works and new buildings. The Council will seek to ensure that proposals for golf courses do not reduce the distinctiveness and diversity of the District’s landscape. The Council is particularly concerned about the effect on the special landscape qualities of the Surrey Hills Area of Outstanding Natural Beauty and the Area of Great Landscape Value and future golf course proposals will be directed away from these areas of high landscape quality.”

Proposed golf course
138. The proposed golf course will extend to some 83 hectares (205 acres) and some 40% of the open parkland. Each hole will have 5 rectangular flat tees, varying in size from 80 to 200 square metres. The greens (comprising fine, closely mown, specialist grass) will range in size between 400 and 700 square metres. The total area of tees and greens will be approximately 22,360 square metres. There will be 5,460 square metres of bunkers. In addition to the tees, greens and bunkers, there will be signage, flags, possibly nets, benches and distance markers, tee markers etc.

139. Only the 15th fairway and 16th tee will be physically located within the AONB, on 40-acre field. The remainder of the golf course will be located adjacent within the AGLV but congruent to the AONB itself. It should be noted that the Surrey Hills AONB Board has stated that, in the view of the landscape value of the AGLV to the AONB, the AGLV should be included within the AONB.
143. In their conclusions to OR1, the planning officers recommended refusal of permission, *inter alia*, because (1) the proposed golf course would be “seriously detrimental” to the visual amenities of the locality and contrary to the relevant policies, and (2) “no justification” had been provided as to why the proposed golf course could not be located elsewhere (see above).

**OR2**
144. In Report OR2, the planning officers advised members in equally clear terms that were no exceptional circumstances or public interest reasons justifying this proposed incursion into protected landscape:

> “The NPPF emphasizes the importance of protecting valued landscapes. Protection of such landscapes needs to be commensurate with their status and appropriate weight should be given to their importance. The NPPF is explicit in that planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. In this case, it cannot be demonstrated that there are any exceptional circumstances for allowing the development proposal in such a valued landscape and there is little to suggest the proposal is in the public interest. The proposal is therefore considered to be contrary to the advice contained in the NPPF.”

**Reasons**
145. The Council majority did not follow the planning officers’ recommendations on harm to the landscape. The Council majority stated in paragraphs [6], [7] and [8] of the Reasons that: (i) the landscaping and mitigation measures contained in the application “were sufficient” to ensure that “the overall landscape character” would not be compromised; (ii) the design met the terms of planning policies designed “to protect… the character of the countryside”, namely Core Strategy policy CS13, Local Plan policy ENV22 and REC12 and Surrey Hills Management Plan policies LU2 and LU3; (iii) the management plan “could meet” commitments to safeguard and enhance the natural environment within the NPPF, Core Strategy policy CS13, Local Plan policy ENV22 and REC12 and Surrey Hills Management Plan policies LU2 and LU3; and (iv) the character of the countryside “could be safeguarded” even within and adjacent to the AONB.

**Analysis**

‘Major development’
146. Paragraph 116 of section 11 of the NPPF provides that “Planning permission should be refused for major developments in these designated areas...”. The NPPF does not define “major developments” but, in my view, it clearly covers
something on the scale of an 18-hole golf course. Mr Findlay QC and Mr Katkowski QC submitted that, since only a small proportion of the proposed golf course (the 15th fairway and 16th tee) would actually be located within the designated AONB, paragraph 116 of Section 11 of NPPF had no application. A tee and a fairway could not be described as a “major development” in an AONB.

147. The planning officers advised, however, that paragraph 116 of the NPPF did apply and that the “exceptional circumstances” and “public interest” tests applied. In my judgment, the planning officers were right. Paragraph 116 of the NPPF is plainly intended to include “major developments” which physically overlap with designated areas or visually encroach upon them. In the present case, it would be artificial, and frankly myopic, to focus simply on the one tee and hole physically within the curtilage of the AONB and ignore the other 17 tees and holes course along the border of the AONB. It would also be contrary to the spirit of Section 11 of the NPPF since the policy is pre-eminently concerned with visual perspectives. In my view, the visual impact of the whole proposed golf course on the AONB was clearly relevant and a material consideration. It was also relevant that the adjoining AGLV was considered of AONB quality (and might be redesignated as such in the near future.) There is no evidence or indication that the Council majority considered this issue at all. The Reasons certainly do not suggest the contrary view, i.e. the non-application of paragraph 116 of the NPPF.

“Exceptional circumstances” and “public interest” tests

148. Paragraph 116 of the NPPF provides that planning permission should be refused for major developments in designated areas “...except in exceptional circumstances and where it can be demonstrated that they are in the national interest” and specifies the sort of matters to be assessed in this exercise.

Planning officer’s advice

149. The planning officers’ advice in relation to the paragraph 116 tests was clear and unequivocal:

“In this case, it cannot be demonstrated that there are any exceptional circumstances for allowing the development proposal in such a valued landscape and there is little to suggest the proposal is in the public interest.” (see OR2 also cited above)

150. In its application Longshot argued that the visual impact of the golf course on the AONB would be limited because of the mitigation measures. However, as pointed out by the planning officers in OR1, there was no getting away from the fundamental fact that the scheme involved the imposition of an artificial golf course development over 40% of the open parkland at Cherkley, a highly exposed location, conspicuous from public highways and rights of way, and it was very difficult to disguise such features. The mitigation measures simply did not address this fundamental mischief. It was for this reason that the planning officers advised that, in the light of the evidence from the Council’s own independent landscape assessment, Natural England, the AONB Planning Advisor, the County’s Landscape Adviser and the National Trust, the proposal would be harmful to the landscape character of the AGLV and AONB and was therefore contrary to PPS2,
PPS7, Core Strategy Policies CS1 and CS13, ‘saved’ Mole Valley Local Plan Policies REC4 and REC12.

Reasons silent on ‘exceptional circumstances’
151. The Reasons are silent on this issue. There is no reference in the Reasons to paragraph 116 of the NPPF. There is no mention in the Reasons of any “exceptional circumstances” or “national interest” reasons for allowing the development. There is no explanation in the Reasons as to why the Council majority might have disagreed with the planning officers’ advice on this issue. Nor do the Reasons contain anything which might be regarded as complying with paragraph 116 or satisfying either of the “exceptional circumstances” or “national interest” tests. Paragraphs [6], [7] and [8] of the Reasons touch on landscape issues generally, but are primarily directed towards approving the landscape mitigation measures. Paragraph [3] of the Reasons deals with “sustainable development” and the benefit which the development would bring to the local economy, providing jobs for local people and accommodation and facilities for visitors to the District; but there is no suggestion that the economic benefits were exceptional and it merely concludes that the development was considered overall “to balance” the needs of the economy with those of “nature and landscape conservation”. The concluding paragraph, Paragraph [11], contains similar sentiments.

152. Decision-makers have to have regard to material considerations but do not have to mention them (R(Bolton MDC) v. Secretary of State for the Environment [1995] 94 LGR 387). However, the fact that the Reasons do not even elucidate why the Council majority disagreed with the planning officer’s advice or point to what “exceptional circumstances” or “national interest” they relied upon is telling: it points to the fact that the Council majority simply failed to have the relevant paragraph 116 tests in mind when coming to their decision.

Longshot’s argument
153. Mr Katkowski QC sought to side-step paragraph 116 of the NPPF by arguing that, since the Council majority (a) rejected the conclusion that the development was harmful to the landscape and (b) was ‘mindful’ of the benefits that the scheme would bring, no error of law arose. In my view, this is heretical. Absence of harm does not obviate the need to apply the paragraph 116 “exceptional circumstances” or “national interest” tests. Further, it is no answer to say that because part of the specified assessment process laid down by paragraph 116 of the NPPF was carried out (i.e. the analysis specified in the three bullet points) the test did not have to be applied, i.e. that the requirement specifically to decide that sufficient “exceptional circumstances” or “national interest” reasons existed justifying the development in protected landscape was somehow fulfilled. It is palpably evident that the matter was simply never considered by the Council majority or featured in their thinking as a policy requirement or material consideration. The assessment process carried out was, in any event, incomplete (see above).

‘Exceptional circumstances’
154. In summary, in my judgment, the Council majority erred in law because it failed to ask itself the relevant questions under paragraph 116 of the NPPF, i.e. whether “exceptional circumstances” existed or whether the “national interest” was
demonstrated. Paragraph 116 of the NPPF was clearly engaged in this case: the scheme represented a “major development” in an AONB. Paragraph 116 is also expressed in mandatory terms: such applications “should be refused” except in “exceptional circumstances” or where the “national interest” is demonstrated. Further, if the Council majority had properly and conscientiously applied the relevant tests under paragraph 116 of the NPPF, they would have concluded that there were no “exceptional circumstances” and “national interest” reasons justifying allowing this development in this protected landscape. None were put forward by the planning officers because it was obviously difficult to think of any.

Perversity – landscape

155. Aesthetic and other planning judgments are peculiarly a matter for the planning decision-makers (c.f. Sullivan J in Ex parte Newsmith Stainless Ltd (supra) at paragraphs [6]-[8]). However, in my judgment, the Council majority could not rationally have come to the conclusion in paragraph [7] of their Reasons that the overall landscape character “would not be compromised” (with our without the site visit which they made). The decision simply flew in the face of the unanimous and trenchant views expressed by the landscape experts that the effects would be “major... adverse, long-term and permanent” and the changes were of “of such magnitude” that the landscape character would be “fundamentally, and probably irreversibly, altered” (see e.g. the passages quoted above). The planning officers also advised unequivocally that the proposals would be “seriously detrimental” to the visual amenity.

“Conserving and enhancing the existing landscape”

156. In any event, in my judgment, the Council majority failed to have proper regard to Paragraph [C] of Policy REC12. Paragraph [C] provides in terms that new golf courses would “only” permitted in the Surrey Hills AONB and AGLV if consistent with the primary aim of “conserving and enhancing the existing landscape”. I agree with Mr Edwards QC that the Council majority’s conclusions that the proposed development would involve change and mitigation is inconsistent with the REC12 requirement of “conserving and enhancing the existing landscape”. Further, in the light of the unanimous evidence from the landscape experts (see above), it is difficult to see how the Council majority could have concluded that the development was consistent with the primary aim under REC12 of “conserving and enhancing the existing landscape”. It involved fundamental “change” by the imposition of an artificial construct of a golf course which, by definition, was not “enhancing” the natural landscape. The “and” is disjunctive in my view.

157. In my judgment, the Council majority simply failed to understand this policy requirement. It received only scant mention treatment in the Reasons at paragraph [7] “…and the character of the countryside could be safeguarded even within and adjacent to the Area of Outstanding Natural Beauty”. This was, in my judgment, inadequate consideration of this clear and important policy imperative.

‘Directed away’

158. Further, there is no evidence that the Council majority had any regard to the specific paragraph 12.72 requirement that new golf courses should be “directed away” from protected landscape in the AONB and AGLV (see above). The same
reasoning as set out on this topic under Ground 2 applies also here under Ground 3.

**Conclusion on landscape**

159. In conclusion, I accept all the Claimant’s arguments on Ground 3. First, in my judgment, the Council majority failed to consider whether there were “exceptional circumstances” or “public interest” reasons justifying allowing this development to take place in the protected landscape of the Surrey Hills AONB and AGLV and therefore, failed to comply with paragraph 116 of the NPPF ground. Second, the Council majority’s conclusion that the overall landscape character “would not be compromised” by the imposition of a golf course on the Surrey Hills AONB and AGLV was perverse. Third, the Council majority failed to have regard to the policy of aim of “conserving and enhancing the existing landscape” in breach of Paragraph [C] of Policy REC12. Fourth, the Council majority failed to consider whether this proposed new golf course could and should be “directed away” to a less sensitive area. For each of these reasons, the Council majority’s decision should be quashed.

**GROUND 5 – WATER**

160. Under Ground 5, the Claimant contended that the Council failed to have regard to the adequacy of water resources in breach of Policy ENV68. The Claimant made two essential submissions: (i) the Council failed properly to understand or apply Policy ENV68; and (ii) the Council failed to have sufficient information whatsoever to permit a conclusion that the requirements of Policy ENV68 were met.

161. Policy ENV68 was a relevant policy to the determination of the planning application in question, since, as noted in the supporting text, golf courses make substantial demands on water resources. Policy ENV68 required the decision-maker to satisfy itself as to the adequacy of water resources before the grant of permission. Local Plan Policy ENV68 (Adequate Water Resources) provided as follows:

“**POLICY ENV68:** Development will only be permitted where the Council, after consultation with the Environment Agency and the relevant water supply companies, considers that adequate water resources are available, or where their provision is not considered detrimental to existing abstractions, river flows, water quality, fisheries, amenity or nature conservation.”

162. The supporting text to Policy ENV68 stated at paragraph 4.286:

“The provision and development of water resources to ensure the supply of water to new development is becoming increasingly difficult in the Thames Region. The scale of development envisaged in the District should not pose a problem but there are some developments such as golf courses that can make substantial demands on water.”
163. Longshot’s water consultants, Irriplan Ltd, did not raise any concerns about the adequacy of water supplies, save to point out in paragraph 5 of their report dated 26th September 2011 that “until a pump test is carried out there can be no guarantee that a borehole will yield the sought for quantities of water”. This does not assist the Claimant. The fact that something is not “guaranteed” does not mean that it is not, in fact, “available” within Policy ENV68.

164. The Claimant submitted that the Council failed properly to satisfy itself that the adequate water resources were “available” before granting of planning permission. The plan was for water to be supplied by a borehole into an aquifer (the subject of Condition 57). However, no pump test had been carried out prior to the grant of planning permission to determine whether there was, in fact, sufficient water available and what the environmental effects of extracting water (e.g. on the River Mole) might be. The Claimant also contended that the Council planning officers had failed to grapple with the question of the adequacy of water resources in their Reports to the planning committee, OR1 and OR2, neither of which made any mention of Policy ENV68.

165. In his helpful statement, the Council’s Principal Conservation Officer, Mr Rodney Shaw, explained that he was well aware of the requirements of Policy ENV68 and, having carefully looked into the issue, he was satisfied that water was not going to be a problem. I accept his evidence. The Environmental Statement stated that the intention was to take the water from the Lower Greensand aquifer which was classified “water available”, i.e. water likely to be available “at all flows, including low flows”. The Environment Agency confirmed in its report dated 15th December 2011 that “[t]he groundwater resources of the target aquifer (Lower Greensand) are not heavily used near Cherkley court...”, but stated that a licence would not be issued if the borehole could not sustain the required yield. Mr Shaw said that he did not read the latter as casting doubt on the water resources in this area as a whole. In my view, he was right. In stating that a licence would not be issued if the borehole could not sustain the required yield, the Environment Agency was merely pointing out the obvious. There was, moreover, no requirement to have a licence in place before applying for planning permission (as planning officer’s Report OR4 pointed out). Moreover, the fact that the precise water yield from the borehole could only be determined after testing, did not suggest that adequate water was not available.

166. Mr Shaw also followed up a query raised by the Kent branch of the Campaign for Rural England as to the effect of abstraction, by calling the Environment Agency and discussing the matter with the relevant officer there, Mr Steve Barrow. Mr Barrow confirmed that there was adequate water available in the Lower Greensand to service the proposed golf course and there were no adverse environmental impacts.

167. The pertinent matters regarding the adequacy of water supplies were appropriately summarized on p. 83 of the first planning officer’s Report OR1:

>“Concerns have been raised about the impact of the proposals for water abstraction on the ecology of the area. The Environment Agency has provided advice to the applicant and, on the basis of that advice,
proposes to obtain their water from a deep borehole into the Lower Greensand. The Agency has indicated that there are examples of other similar abstractions that take place from the Lower Greensand and that there are no other similar abstractions taking place in this part of the Lower Greensand. They do not consider that there will be direct environmental impacts as a result of water abstraction from the borehole. However, the applicant will need to provide the Agency with details of the water quantities they will wish to abstract and will need to apply for consent to drill and test. The Agency would place conditions on the pumping test. If this is successful, an abstraction license would be required which, if granted, would have conditions attached. The license would be reviewed after a period of 10-12 years and that review would take account of any known environmental impacts.”

168. I do not consider the absence of an express reference to Policy ENV68 itself in report OR1, or the other planning officer’s reports, to be material in any way. I accept Mr Shaw’s evidence that he did not include an express reference to Policy ENV68 simply because water was, rightly, not considered a problem.

Conclusion on water

169. In conclusion, therefore, in my judgment, the Council planning officers did not ignore Policy ENV68. They adhered to it. In my view, they put before the Council ample evidence to enable Council members to consider that adequate water resources would be “available” to sustain the proposed development in accordance with Policy ENV68. For the above reasons, I reject the Claimant’s Ground 5.

GROUND 1: GREEN BELT

170. Under Ground 1, the Claimant contended that the Council majority failed to have proper regard to the Green Belt Policy. The Claimant made two essential submissions: (i) the Council majority failed properly to construe Green Belt policy as set out in NPPF and as reflected in the Development Plan and, accordingly, failed to have regard to material considerations and to determine the application in accordance with section 70(2) of the 1990 Act and section 38(6) of the 2004 Act; alternatively, (ii) the Council majority failed to give adequate reasons for their conclusion in respect of the Green Belt Policy, in breach of article 31(1)(a) of the 2010 Order.

NPPF

171. The National Planning Policy Framework (“NPPF”) must be taken into account in the preparation of local and neighbourhood plans, and is a “material consideration” in planning decisions (see sections 19(2)(a) and 38(6) of the 2004 Act and section 70(2) of the 1990 Act).

NPPF – Protecting Green Belt Land

172. Green Belt policy is aimed at preventing “urban sprawl” by keeping land “permanently open”. Section 9 of the NPPF provides as follows:
“9. Protecting Green Belt land

79. The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

80. Green Belt serves five purposes:

- To assist in safeguarding the countryside from encroachment;

87. As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

88. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

87. A local planning authority should regard the construction of new buildings as inappropriate in Green Belt. ...”

173. Local planning authorities must ask three separate sequential questions when applying Green Belt policy:

1. Is “inappropriate development” proposed?

2. Do “very special circumstances” exist?

3. Do such circumstances “clearly outweigh” the potential harm caused by the inappropriateness of the development and any other harm?

174. Local planning authorities are also required to give “substantial weight” to any harm which might be caused to the Green Belt by the “inappropriate development”.

175. It is only if a local planning authority has conscientiously considered each of these three questions and answered each “Yes”, and given substantial weight to any harm caused, can it be said properly to have applied Green Belt policy as laid down in the NPPF. In my view, the Council majority did not properly consider or answer any of these questions when making its decision on the Green Belt policy, certainly not the second and third (see below). There was a total failure to consider “very special circumstances”. It is also not clear that the Council gave substantial weight to the harm caused.

Mole Valley Local Plan and Green Belt policy

176. Paragraph 12.71 of the Mole Valley Local Plan re-enforces the Green Belt Policy with two further protective layers. First, paragraph 12.71 of the Local Plan
refers to the Green Belt policy in the strongest terms: the protection of the District’s Green Belt and countryside is stated to be “of paramount importance”. Second, paragraph 12.71 goes on to impose the threshold requirement that applicants proposing new golf courses in the Surrey Hills must demonstrate that there is “a need for further [golf] facilities”. The requirement to show “need” pursuant to paragraph 12.71 is dealt with under Ground 2 above. It also arises under Green Belt policy itself (see further below). As I have said, these policy matrices should be read holistically.

**New buildings**

177. Local planning authorities are to regard the construction of new buildings as “inappropriate development” in Green Belt (paragraph 89 of NPPF above). Longshot’s proposed development at Cherkley Court included the construction of the following “new buildings”: (i) the underground spa, (ii) part of the underground swimming pool, (iii) the maintenance/service hub building and (iv) new guest rooms including the Glass House Cottages.

**Planning officers’ advice in OR1**

178. The main planning officers’ advice on the ‘New Build Elements’ in the context of Green Belt issues is contained in OR1 (at pp. 59-62). The planning officers, in effect, divided the “new buildings” into three categories.

(1) The first category comprised the extensions to existing buildings, Cherkley Court, Garden House and Garden House Cottage, the nearby detached plant enclosures, and the orangery link which the planning officers advised “will be small in scale” and “will not have an impact at openness”.

(2) The second category comprised the Health Club extension and the new Glass House Cottages which would re-use the floorspace and volume of other buildings previously permitted (inter alia by a 2003 permission) and “the re-use was a sufficient very special circumstance to justify what is otherwise inappropriate development”.

(3) The third category comprised the other buildings, including the partly underground swimming pool, the underground spa and the partially underground maintenance/service hub buildings. The planning officers rejected the case advanced by Longshot, that the “very special circumstances” exception applied put forward on the basis these new buildings were wholly or partially underground and would not be disproportionate to the existing buildings. The planning officers advised as follows: (i) whilst the spa would be partially underground, “it would be of a considerable size and would generate a significant amount of activity”; (ii) the maintenance facility was also “not a small building” and “would have a wide vehicular access for service vehicles in the roof”; (iii) the spa and swimming pool (which would be marketed to and open to 275 members of the public) might be needed commercially to make the venture financially viable but (a) “commercial” requirements are not “planning” requirements, (b) these are uses which can be located in “built up” areas in the locality which do not impact on the Green Belt, and (c) REC11 presumes against recreation facilities in the Green Belt which are not incidental to outdoor recreation facilities”.

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179. The planning officers also pointed to the case of Hersham Golf Club (appeal reference APP/K3605/A/10/2142827) in which the issue of underground buildings in the Green Belt had been tested on appeal and said that similar conclusions could be drawn in the present case, namely that, notwithstanding the location of some elements below ground level, there was nevertheless an impact on the openness of the Green Belt.

180. The planning officers expressed considerable concern at the activity and movement of vehicles that the spa and swimming pool would generate which they said would be harmful to openness in the Green Belt and concluded that there were insufficient “very special circumstances” to justify the development which therefore failed the Green Belt policy tests in PPG2:

“Despite the spa’s position underground, it is considered that the activity associated with the spa and swimming pool in the Green Belt would be harmful to openness, especially in an area that is isolated and where people would have to rely on the private car rather than private transport to access the site. The new build elements are inappropriate development that is harmful to openness. It is considered that there are insufficient very special circumstances to justify those elements of new development in the Green Belt and as such they fail Green Belt policy tests in PPG2. The golf course maintenance facility and service hub building will have a dual use, and whilst accepting that the service hub element will help to minimise the movement of vehicles around the site, it is considered that this element of the proposal is not genuinely ancillary to the golf course and therefore fails the PPG2 policy test with regard to essential facilities.

181. The planning officers also had regard to the fact that Natural England might in the future include the whole site within the AONB:

“In addition, as Natural England may, in the future, consider including the whole site within the AONB and an independent assessment suggests that this land within the site is of AONB quality, some weight can be given to Policies LU2 and LU3 of the Surrey Hills Management Board. Part of these policy considerations relate to respecting the tranquility of the area. Clearly, the spa/health club and swimming pool will attract visitors and their cars to the site and this will be contrary to the Surrey Hills adopted policy”.

Recommendation in OR1

182. The planning officers’ recommendation in OR1 in relation to Green Belt policy was unequivocal: the new buildings, together with the activity generated by the proposed uses, would represent “inappropriate development in the Green Belt, in conflict with the aims of PPG2” and there were no “very special circumstances” advanced which clearly outweighed the harm caused by reason of inappropriateness and the level of activity generated (see pp. 106-107 of OR1 cited above).
183. The planning officers advised that facilities such as golf courses in the context of Green Belt require proof that “they were, indeed, ‘essential facilities’” (see OR1, p. 54). There was no evidence of such “need” (see above).

Reasons

184. The Council majority’s reasons for differing with the planning officers’ advice and conclusions in relation to Green Belt policies is set out at paragraph [5] of the Reasons:

“[12] The development was considered not to compromise significantly the Green Belt policies contained in the NPPF and the Council’s Core Strategy by: re-using existing buildings, utilising floorspace granted under previous, extant permissions and locating additional floorspace underground. The design of the development in terms of siting, scale and detailing was considered to retain substantially the openness of the site sufficiently to overcome concerns set out in the officers’ report, having regard to the other benefits that would be achieved.”

Analysis

185. It is clear that the Council majority failed to apply the “very special circumstances” test when deciding that the Green Belt policy had not been breached. Nowhere is there any mention of the Council majority recognising that there was “inappropriate development”. Nowhere is there any mention of the Council majority being satisfied that there were “very special circumstances” justifying the “inappropriate development” in the Green Belt. Nowhere is there any explanation as to why the Council majority disagreed with the planning officers’ advice. The test simply does not feature, either expressly or inferentially, either in paragraph [12] above or elsewhere in the Reasons. This notable omission is not cured by a mere general reference to the NPPF in the introductory paragraph of the Reasons (see above). The NPPF covers a vast array of policies.

Meaning of “very special circumstances”

186. The “circumstances” must be “very special” as opposed to common or garden planning considerations (R(Dartford BC) v. First Secretary of State and Lee [2004] EWHC 2549 (Admin)). They must also be “not merely special, in the sense of being unusual or exceptional, but very special” (R(Chelmsford DC) First Secretary of State and Draper [2003] EWHC 2978 (Admin). The absence of harm or the fact that the harm caused is ‘slight’ “will rarely be sufficient to constitute very special circumstances” (R(South Buckinghamshire v. Secretary of State for the Environment (CO/184/1998) and the cases cited in the Encyclopedia of Planning Law & Practice, 5-034.51).

Reasons

187. It is not altogether easy to unbundle Paragraph [12] of the Reasons which is expressed in somewhat brief and delphic terms. It is apparent, however, that the rationale for the decision on Green Belt policy is very limited in nature. It is confined to a finding that the re-use of existing permissions, the location of floorspace underground and the overall design is such as to ameliorate the
development’s impact on openness “...sufficiently to overcome concerns set out in the officers’ report, having regard to the other benefits that would be achieved”. It is not clear, however, that this grapples with or addresses the main “concerns” expressed by the planning officers in OR1, namely the level of vehicle activity that would inevitably be generated by proposed scheme, in particular by the spa and swimming pool (see above).

188. I pause to query whether the fact that “new buildings” may be located underground and proportionate in size and design can ever properly be regarded as “very special circumstances” outweighing the harm caused, as opposed to merely relevant to the degree of “inappropriateness” of the new buildings, i.e. harm caused. In any event, such considerations can only address physical harm to the Green Belt and cannot address “other harm”, i.e. caused by vehicular and other activity.

189. The reference to the “other benefits” that would be achieved would appear to be the somewhat prosaic benefits listed in paragraph [3] of the Reasons in the context of “sustainable development”, namely economic benefits, jobs for local people, accommodation and facilities for local visitors. “Economic benefits” are also referred to again in paragraph [11] of the Reasons. There is no suggestion, however, that such “economic benefits” are in any way out of the norm, or other than might be expected for such commercial developments, or that the same would need some exceptional economic or employment demand in the locality. In my judgment, the reference to “other benefits” in paragraph [5] is a far cry from the “very special considerations” that need to be demonstrated to justify “inappropriate development” in the Green Belt. It is clear, in my view, that the Council majority simply did not consider whether any “very special considerations” existed, let alone whether such considerations “clearly outweighed” the harm caused to the Green Belt by the “inappropriate development”.

190. Nowhere in OR1 did the planning officers suggest that the economic benefits, i.e. jobs, that this golf/ spa development would bring to the local economy might represent “very special circumstances” such as to justify the development in the Green Belt. Nor was it suggested that local jobs etc. could amount to “very special circumstances”.

191. The only “very special circumstances” in fact advanced by the applicants (and which were the subject of analysis by the planning officers) related to the underground siting and scale of the buildings (see p. 61 of OR1 referred to above). In my view, if relevant at all, the cross-reference to “other benefits” in the Reasons represented, at best, a ‘fig-leaf’ attempt to justify an ‘overall planning decision’. There was no consideration given to “very special considerations”.

Other flaws
192. In my judgment, the Council majority’s decision and reasoning in relation to Green Belt policy was flawed for other reasons. The first and second questions referred to above were not properly addressed (as well as the third). The Reasons fail to acknowledge clearly, and unequivocally, that the proposed new buildings
development amounted to “inappropriate development” harmful to Green Belt (the first question). The Reasons also failed to acknowledge clearly, or at all, that “substantial weight” must be given to any harm which the proposed “inappropriate development” might cause to the Green Belt (the second question). There is no indication that the Council majority gave “substantial weight” to the potential harm which by definition the proposed new buildings would cause to the Green Belt. It was no answer to the requirement to find “very special reasons” to state, somewhat equivocally, that the proposed new development “was not considered to compromise significantly the Green Belt policies” (see above). Further, there is no indication that, at any stage, the Council majority gave “substantial weight” to any harm caused. Thus, even if the Council majority considered the potential harm to the openness of Green Belt caused by the proposed development was less serious than the planning officers believed, the proposed development nevertheless comprised “inappropriate development” and the decision-makers were enjoined to give “substantial weight” to any harm caused.

“Need” for golf facilities under Green Belt policy

193. As the planning officers advised (in OR1, p. 54), recreational facilities such as golf courses are not generally regarded as in conflict with the policy of preserving the openness of the Green Belt. Applicants must, however, be able to demonstrate a “need” for the facilities in terms of the size and type “in order to show that they are, indeed, “essential facilities” and therefore not inappropriate development”. If “need” cannot be demonstrated, applicants must satisfy the “very special circumstances” test (see above).

194. In the present case, the Council majority did not demonstrate, adequately or at all, they were able to conclude that there was a “need” for a further golf course in this part of the Surrey Hills. They were unable to do so for the reasons which I have held under Ground 2 above. The Council majority should have satisfied themselves that Longshot could show “very special circumstances” existed which “clearly outweighed” the harm caused by the inappropriateness of the proposed golf course facilities themselves, and any other harm caused. The Council majority failed to do so because they formed a mistaken understanding of the meaning of “need”. This failure amounts to a further error of law.

Conclusion on Green Belt

195. In my judgment, the Council majority failed conscientiously to consider the three questions set out above, in particular whether “very special circumstances” existed which “clearly outweighed” the harm. The Reasons were inadequate. The Council majority at best paid lip-service to the Green Belt policy but did not apply it. The Council majority failed to take a proper policy-compliant approach to Green Belt considerations. I therefore grant permission for judicial review on Ground 1 and would quash the Council’s decision to grant planning permission on Ground 1 also.
numerous legal bunkers by resort to ‘employment benefits’ and the overall planning ‘balance’. The difficulty of the task that they faced, however, is evident from the terseness and inadequacy of the Reasons themselves. In my view, they were tasked with defending the indefensible.

RESULT

207. In the result, for the reasons set out above, I uphold the Claimant’s challenge on **Ground 2** (‘need’) and **Ground 3** (‘landscape’) and **Ground 1** (‘Green Belt’), but not **Ground 5** (‘water’) or **Ground 8** (‘Glass House Cottages’).

208. I therefore quash the Decision by the Mole Valley District Council on 21st September 2012 to grant planning permission to Longshot Cherkley Court Limited to develop Cherkley Court and Cherkley Estate, near Leatherhead in Surrey, into exclusive golf and hotel facilities on the grounds that the Council’s decision was variously legally flawed, contrary to planning policy, failed to take account of material considerations, irrational and the Reasons given for it were inadequate. I will hear submissions from counsel on the appropriate form of Order.

Postscript - 19th hole

209. I am grateful to all counsel and their legal teams for their able assistance in this interesting case, and pay tribute to the courteous and civilised manner in which the matter has been conducted throughout on all sides.
APPENDIX 2C – TETBURY SoS DECISION AND JR

The Tetbury Recovered Appeals – AONB and the 5 Year Supply:

the NPPF undermines the Dower Test


Two recovered appeals at Tetbury in Cotswold District cast light on whether protection of AONB really is weaker under the NPPF – it is.


and


"Of course under PPS4 the designation was never an absolute block on development. The famous Dower test, after fierce lobbying retained in the final version of the NPPF, only applied to major development and development could pass it if it met its impact test requirements. Arguably it was applied too strictly as a blanket ban, never intended and harmfully to many villages in the larger non-high upland AONBs such as the Weald and the Cotswolds.

“But under the NPPF of course we have, despite the dower test, para 14. These appeals enlighten us as to how the SOS will apply it in these cases.

“The language is similar in both cases so lets concentrate on the larger one – Highfield Farm – 250 units.

12. The Secretary of State agrees with the Inspector that the proposed development would fundamentally conflict with the development plan, which seeks to restrict residential development on land like the appeal site which lies outside any settlement boundary and inside an AONB. He agrees that the Framework states that relevant policies for the supply of housing should not be considered up to date if the council cannot demonstrate a 5 year land supply, and that this should be considered by establishing the housing requirement and then the supply of deliverable sites.

The 5 year supply issue was a tough one as the development plan relied on an evidence base from 1996!
And just as the ghost of revoked RSS has lived on in recent appeals so does the ghost of never even adopted RSS – take a deep breath as this utters from Pickles mouth.

13. He therefore proposes to use the figure of 2,022 dwellings, derived from the draft RS Proposed Changes, as the five year housing requirement in this instance... He agrees with the Inspector that this is not an endorsement of this figure as representing the objectively assessed housing need for the district, but in the absence of an up to date development plan, he considers it to be a more robust housing requirement than the SP requirement. In reaching this conclusion he has taken account of the policy in the Framework to boost significantly the supply of housing.

Imposing on the Cotswolds a figure never even examined... Muscular (sic.) localism in action, All that talk about removing imposition of RSS from Pickles really mean he wanted to muscle in and impose it himself.

So para 14... kicks in because inside AONB when there is a 5 year housing land supply shortfall permission is not automatic.

17. He finds that the inability of the council to demonstrate a five year land supply means that the relevant policies for the supply of housing cannot be considered up to date, in accordance with policy in the Framework. The Secretary of State agrees with the Inspector that the special emphasis in the presumption in favour of granting planning permission in such circumstances does not automatically apply in this case, because of the specific policies in the Framework that indicate development should be restricted and the duty to have regard to the purpose of conserving and enhancing the natural beauty of the AONB. The Secretary of State further agrees that the serious shortfall in the supply of housing land is a material consideration that weighs heavily in favour of allowing the proposed development, but there are other material considerations that need to be weighed in the balance.

20. There is no evidence to indicate that the remaining shortfall could be addressed solely through the use of previously developed sites. He notes that the Inspector found no evidence of anything other than very limited scope to provide housing on sites outside the AONB. Although preliminary work on the Core Strategy Second Issues and Options Paper identifies a potential strategic site at Cirencester, outside the AONB, he attributes limited weight to this due to the early stage of plan preparation.

24. In concluding on these three considerations, the Secretary of State agrees that the proposed development would not harm the setting of Tetbury; it would detract from the significance of Highfield Farmhouse; and harm the AONB through the loss of open fields. He agrees that there is no evidence that there is anything other than very limited scope to provide housing within the district on sites that are not in the AONB.
He also agrees that there is a clear and pressing need for more housing both in terms of the shortfall locally within Cotswold District and nationally. He agrees with the Inspector that these amount to exceptional circumstances, where permitting the proposed development can reasonably be considered to meet the wider public interest in terms of the Framework.

Two conclusions from this decision:

Firstly this shows the dumbness of both the automaticity of the NPPF and the inability to consider alternative sites that may be much more sustainable if a plan is not yet in draft form. Why not?

Secondly paragraph 24. is very dangerous opening the door to similar exceptional circumstances and more strikingly Green Belt. Dozens of developers will see this and see the familiar Green Belt phrase ‘exceptional circumstances’ as signal to bung in spec applications on far-fetched Green Belt sites whilst they await late local plans to be finalised.”

NOTES:

The Decision of Rt. Hon. Eric Pickles, Secretary of State for Communities and Local Government has been subjected to Judicial Review (heard in the High Court in early November 2013).

The decision and process seem to suggest that there is great urgency required in developing the emerging Local Plan so as to prevent any Green belt or AONB site falling to the mercy of developers.

Clearly a core part of the Evidence Base (the GBCS) which suggests that the Green Belt need to include Potential Development Areas represents a major threat to highly vulnerable areas of the Borough, not least where these are also AONBs.
APPENDIX 2D – Letter from Rt. Hon. Nick Boles MP
Thank you for your letter of 6 June enclosing correspondence from your constituent, Mr [redacted], in regards to Green Belt development.

Let me start by reiterating that our policy sets out that the Government attaches great importance to the Green Belt, the fundamental purpose of which is to prevent urban sprawl by keeping land permanently open. Most development is inappropriate in the Green Belt and should not be permitted other than in very special circumstances. Green Belt boundaries should be revised only in exceptional circumstances through the preparation or review of the area’s Local Plan, a process involving extensive public consultation. Our planning policy also sets out clearly that planning must recognise the different roles and character of different areas and the intrinsic character and beauty of the countryside. It includes strong protections against inappropriate development in areas of valued landscape and heritage.

We must also be honest that, as a nation, we have not provided sufficient housing for many years to meet growing household needs. Our policy therefore rightly asks Local Planning Authorities to plan to meet their objectively assessed needs for market and affordable housing in a way that is consistent with policy as a whole. National planning policy, including the appropriate balance to be struck between enabling sustainable development and conserving and enhancing our valued natural and historic environment, is designed to be interpreted and applied locally by Local Planning Authorities in conjunction with their communities.

In a Ministerial Statement of 1 July the Government set out its concern that in some recent decisions by Local Planning Authorities and the Planning Inspectorate it appeared that the Green Belt was not always being given the sufficient protection that was the explicit policy intent of Ministers. In this statement the Government therefore reaffirmed the protections that apply in the Green Belt and set out that for housing and traveller sites, unmet need alone is unlikely to justify the very special circumstances necessary to permit such development in the Green Belt.

I would therefore reassure Mr [redacted] that there are both strong planning safeguards to prevent inappropriate development and encourage him to contribute his views on this matter during public consultation on the Local Plan and in respect of particular developments.

NICK BOLES MP
APPENDIX 3 – How Many Homes?
Commentary on the GBC Background Paper ‘How Many New Homes?’ October 2013

A note prepared by John Baylis on behalf of Guildford Society Planning Group

1. INTRODUCTION

This note examines ‘How Many New Homes?’, a GBC background paper which will inform selection of the housing number in the new Local Plan. The paper offers a wide range of options. It is argued that a choice from the lower end of the range is defensible. The paper can be accessed from guildfordplan.com using Google.

This note quotes the options from the paper, gives some background statistics and then makes a few further remarks on each of the options. GBC used consultants, Edge Analytics, and the note goes on to consider the Edge Analytics report. Finally, the note gives a review of the options and concludes that a choice from the lower end of the range is defensible.

This note does not consider the direct effects on housing numbers of sustainability factors, infrastructure provision, local topology, Green Belt or the duty to cooperate. All these matters are very likely to reinforce the note’s conclusion.

2. THE OPTIONS

The paper considers eleven options. They are set out in the paper’s Executive Summary and look at the future need for homes between 2011 and 2031. Quoting from the Executive Summary, the options are:

Official CLG numbers
1: 14,071 homes (an average of 704 a year). This housing number is based on the government’s 2011 projections for household growth.
2: 8,300 to 9,480 homes (an average of between 415 and 474 a year). This housing number is based on the government’s 2010 projections for household growth.

Migration-trend based housing numbers
3: 11,820 to 13,480 homes (an average of between 591 and 674 a year). This housing number is based on a modified version of migration trends over the last five to ten years.
4: 3,620 to 4,520 homes (an average of 181 to 226 a year). This housing number is based on an assumption that only the same number of people would move into Guildford borough as move out of the borough.

Jobs-led housing numbers
The Guildford Society response to GUILDFORD BOROUGH COUNCIL Issues and Option Consultation November 2013 - DRAFT 2a

5: 7,160 to 8,520 homes (an average of 358 to 426 a year). This housing number is based on the calculation, by Experian in spring 2010, of the number of new jobs that are likely to be created in the borough.

6: 11,440 to 13,100 homes (an average of 572 to 655 a year). This housing number is based on the calculation, by the Institute of Employment Research (IER) in 2007, of the number of new jobs that are likely to be created in the borough.

7: 9,280 to 10,800 homes (an average of 464 to 540 a year). This housing number is based on an average of the Experian and IER data for the number of new jobs that are likely to be created in the borough.

Dwelling-led housing numbers
8: 6,864 homes (an average of 312 a year). This housing number is based on the number of homes that have actually been built in Guildford borough in the last 13 years.

9: 7,084 homes (an average of 322 a year). The draft South East Plan proposed a lower housing number for Guildford borough than the final version of the plan. This housing number is the same as the one in that draft plan.

10: 21,320 homes (an average of 1,066 a year). This housing number is based on a housing needs assessment model for meeting all of our existing and forecasted future need for affordable homes in the borough to 2031.

11: 14,168 homes (an average of 644 a year). This housing number would meet about half of our existing and forecasted future need for affordable homes in the borough to 2031. The number is based on a model, which looks at how much supply and demand is balanced across the different tenures and property sizes.

Thus the projected numbers of homes needed in the future range from 181 - 226 new homes a year (based on hypothetical zero net migration) to 1,066 homes a year (meeting the entire SHMA affordable homes need figure).

The Council employed a specialist firm, Edge Analytics to assist with and to critically review the above findings. The second half of the paper comprises their report.

The paper notes that National government policy tells us we must plan for growth.

3. BACKGROUND

The borough had a population of just over 137,000 people in 2011, (Census 2011), an increase of 5.8 per cent from 2001 (0.6% per year). The 2011 Census shows that there were just under 54,000 households in the borough.

There is a need for more affordable homes. As of 31 March 2013 there were 2,090 priority households on the Council’s housing waiting list (those in bands A-C, which are the highest priority of the five waiting list bands).
From 2009 to 2031, the population projection data suggests the number of people aged 60 or over will increase from 28,300 to 38,700. For this and other reasons the number of people who will live alone in our borough will increase. In 1991, the number of single-person households made up 25 per cent of all households. By 2031, the data suggests that these households will account for 39 per cent. Past trends suggested household sizes were decreasing, but the recent Census in 2011 has surprisingly shown that household sizes have increased from 2001.

Over the six years 2007 to 2012 there have been about 1,630 births and 1,000 deaths in the borough each year, giving a ‘natural change’ of about 630 per year (0.46% per year).

Over this same period the average net internal migration has been close to zero, about 15 per year, i.e. over the whole five years the total internal immigration to Guildford from the rest of the UK has exceeded the total internal emigration from Guildford by only about 70.

In 2001/02 international immigration and emigration were equal at about 2,000 per year. Over the three years 2009/12 the average immigration was about 3,500 and emigration 1,600, giving a net international migration of about 1,900 per year (about 1.4%). This is far greater than the natural change and the net internal migration figures above. The paper implies that this may have something to do with the rapidly increasing number of foreign students at the university. The paper remarks that “International migration is estimated to have had the most significant impact upon population in recent years. This has been driven by both an estimated increase in immigration and a decline in the level of emigration. The robustness of this trend is important as it can have a very significant impact on any trend projection that is developed for the Borough.”

The paper then goes on to predict the future net international immigration, and concludes it is has recently been around 0.14% and will fall to a steady 0.06% over the period up to 2031. There is no comment on the gross disparity of the 0.14% figure (source ‘What homes where?’ tool) and the above 1.4% figure (source Edge Analytics July 2013). ‘What homes where?’ predicts close to zero net internal immigration, as above.

Total population change is the sum of the natural change, and the net internal and international immigration.

In the context of Option 1 above the paper then looks at total population predictions for the Borough. Fig 13 of the paper gives three very different prediction curves each based on different Office of National Statistics (ONS) statistical calculations. The most likely curve would seem to be the ‘2008 – based’ curve predicting 153,000 by 2031, about 800 per year, i.e. about 0.6%. This is in accord with the present 0.46% natural change plus the 0.14% net international immigration, i.e. in accord with previous growth.

However the ONS gave a ‘2011 – interim prediction’ which predicts much more rapid growth, to about 156,000 by 2021 (see blue curve of Fig 13.) The curve gives 1.4% average growth per year and thus does not accord with previous growth. The government used this
to predict household growth rates to 2021 and the Council have extrapolated this to give 68,251 households by 2031, a rise of 14,071.

4. REMARKS ON EACH OF THE OPTIONS

1. The 14,071 number comes directly from the above. The paper says “we consider this number to be unachievable”, then comments on the unreliability of the number and notes that the government will produce revised predictions in mid-2014.

2. Edge Analytics used another ONS forecast, the ‘SNPP-2010’, which they argue to be more reliable, and adjusted it to accord with the 2011 census. It gives a net population growth of about 0.65 per cent per year. This gives the range 8,300 to 9,840 new homes. The two different figures reflect predictions based on 2011 and 2008 statistics and account for the rise in average household sizes over this period (from 2.37 to 2.43). Larger households lead to a need for fewer homes.

3. The prediction of 11,820 to 13,480 homes is based on net international immigration figures produced by the ONS for the five years to 2011, but with modification to the ONS long term assumptions. The predicted population growth is 2.1%, 1.05% per year, which is high compared with option 2.

4. This prediction gives 3,620 to 4,520 homes, the lowest of any of the predictions. The paper comments that zero net migration is not the same as only providing for the needs of local people, as it takes into account movement of people in and out of the borough. The prediction is considered to be unrealistically low as regards the need for new homes.

5 and 6. The predictions are based on Edge Analysis modelling of the needs arising from the shortfalls in labour predicted by Experian and the IER over the period 2008 to 2031.

7. This projection uses employment predictions from the Council’s Employment Land Assessment (ELA).

Some of the data for options 5, 6, and 7 are given in the table below. The majority of the housing needs arise from the existing shortfall.

<table>
<thead>
<tr>
<th></th>
<th>Experian</th>
<th>IER</th>
<th>GBC ELA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Growth in employment:</td>
<td>7,825 (0.4% per year)</td>
<td>16,540 (0.9% per year)</td>
<td>12,165 (0.6% p.y.)</td>
</tr>
<tr>
<td>Growth in active labour supply:</td>
<td>4,100 (0.25% per year)</td>
<td>4,100 (0.25% per year)</td>
<td>4,100 (0.25% p.y.)</td>
</tr>
<tr>
<td>Shortfall:</td>
<td>3,725</td>
<td>12,440</td>
<td>8,065</td>
</tr>
<tr>
<td>Pre-existing shortfall in 2008:</td>
<td>13,037</td>
<td>12,447</td>
<td>12,291</td>
</tr>
<tr>
<td>Shortfall in 2031:</td>
<td>16,762</td>
<td>24,887</td>
<td>20,356</td>
</tr>
</tbody>
</table>
8. The average new number of homes built over the period 2000/01 to 2012/13 is 312 per year. In the five years 2008/09 to 2012/13 this fell to an average of 207 per year.

9. The submission draft South East Plan (2006) allocated Guildford borough 322 homes a year. The Council supported this number, subject only to caveats regarding infrastructure provision and the protection of key areas of nature conservation.

10. The prediction of 1,066 homes per year comes from the West Surrey Strategic Housing Market Assessment (SHMA) produced as a result of co-operation between GBC and Waverley and published in 2009. Between 2011 to 2031 the estimated need will be 1,194 x 5 years to overcome the present backlog plus 1,028 x 15 years = 21,320 homes, which gives 1,066 a year. Council considers this housing number unrealistic for several reasons. It would entail a 38% increase in the number of households in the Borough.

11. This housing number also came from the SHMA. The number is based on a model, which looks at how supply and demand are balanced across the different tenures and property sizes. It would mean building 12,880 homes between 2011 and 2031, an average of 644 new homes a year. The Council considers this housing number unrealistic.

The predictions of the eleven options are displayed in a histogram in Fig 18, p 34 of the paper.

5. THE EDGE ANALYTICS REPORT

The Edge Analytics report gives more detail concerning the factors taken into account in arriving at the predictions. It emphasizes that it is important to recognise the high degree of uncertainty associated with evidence on international migration, particularly the recent estimates of emigration from Guildford Borough.

The report gives a brief outline of their POPGROUP model used for modelling and prediction.

At the end it says it has used a commuting ratio of 0.974 as the balance between the size of the resident labour force and the number of jobs available in Guildford. The meaning of this number is not clear. The total employment in the Borough is given as about 83,000 in Options 5 to 7, and the 2008 shortfall as around 12,000, equivalent ratio about 0.85.

The report demonstrates the significant effects of the two different CLG household projection model assumptions used: Scenario A (2011 based) and Scenario B (2008 based). They reflect the rise in household size over recent years.

The report has some useful summary tables. A summary table combining information from several tables in the report is given at the end of this note.
The report does not attempt to do the sum the other way round. For given assumptions and build rates of new homes it should be possible to estimate what the effects will be on population, employment and immigration.

The report has no sensitivity analysis and gives no error bands. There are no estimates of probable error. The reliability of the predictions must decrease with the time ahead. There is no indication of how rapidly the reliability decreases. The report emphasizes the uncertainty of international immigration but does quantify the resulting uncertainty of predicted housing demand.

POPGROUP allows the introduction of population or housing constraints for each year but it is not clear that any have been applied. Many of the extrapolations appear to be linear. There is no justification for this. No limits or saturation effects appear to have been modelled. Hence, for example, the effects of limited infrastructure or of improved infrastructure are not modelled at all.

It seems to be in the nature of such analysis that no account is taken of market or economic forces. The interaction of supply, demand and price is not considered. Thus growth of employment is considered but not growth of earnings. Affordability is not expressed in financial terms. Sensitivity to assumed national GDP growth rates is not investigated.

The general approach appears to be demand led: plan and provide.

As a general comment we judge that the numbers produced by such analysis should be used with much caution, especially if looking more than a few years ahead.

6. REVIEW OF THE OPTIONS

This review refers to the summary table at the end of this note.

The higher options: numbers 10, 11 and 3.

As a general comment, if all LA’s are planning to meet their housing needs, as required by the NPPF, then there should be no great significant net internal migration from one LA to another.

For each of the above cases most of the net inward migration is therefore presumably international. The net inward migration is very large, greater than the internal ‘natural growth’ (the 602 of option 4). For option 10 it is much greater: why ‘all needs’ should include such huge immigration is not clear. Given the constraints under which Guildford suffers, this does to appear to be reasonable. The paper seems to agree: it says that the resulting housing predictions for options 10, 11 and 3 are unachievable or unrealistic. Option 3 (and option 6) are not far behind. They would all very likely meet with massive local objection.
One might think that the difference between ‘population change’ and ‘net inward migration’ would equal the ‘natural growth’ of 602. In fact this difference increases from about 800 to about 1,000 across the options 3 to 10. It is not clear why.

The jobs-led options: numbers 6, 7, and 5

Members of the G Soc Planning Group have forcefully pointed out that employment predictions are not a credible base for target housing provision in the Borough. Work patterns, job changes, working partners and the balance of sheer numbers as against quality of employment all weaken the link between local GDP and housing demand. Borough policy as to whether it should encourage big employers to locate here is also a factor.

We have noted that at present as many people commute out of Guildford as commute in. Providing more housing in Guildford may therefore not reduce commuting significantly. Furthermore, in recent times half the new jobs have been outside the urban areas. An occupant of a home newly purchased in Guildford may thus well commute out. In general provision of more housing and increase in employment population is bound to create some increase in commuting. The key factor in enabling any increase in employment is therefore likely to be provision of improved infrastructure. Present businesses in the town have said that very clearly.

The predictions of these options therefore depend on infrastructure provision. There are also deeper issues as to whether Green Belt should be sacrificed simply in order to allow employment to grow. Generally speaking we would say no. The best way to grow is to increase GDP per capita within sustainable limits, not to increase population massively.

The lower options: numbers 2, 9, 8 and 4

The starting point for debate on numbers is surely the draft SEP figure of 322 per year, option 9. Indeed the Council’s Executive has agreed to use 322 homes a year as the Borough’s interim housing number, until a new local housing number is adopted as part of the new Local Plan. The majority of local people who responded to the South East Plan public consultation that ran in 2006 also supported the 322 number. It originated in the Surrey Structure Plan of 2004 and is in accord with historic building rates as confirmed by option 8. The quirkiness of the modelling is evident in that options 9 and 8 both give significantly more dwellings per year than option 4, but under option 8 are predicted to give lower net immigration (in fact negative).

The final SEP (May 2009) demanded 422 homes a year: the increase was imposed by central government and was arbitrary in that it simply added a round 100 to the previous 322. This led to massive local objection during 2008 and 2009, supported by Councillors and our local MP Anne Milton. There was a vigorous local campaign lead by EGRA and G Soc, and over 4,800 representations from the public were submitted. The campaign’s slogan was ‘Don’t Wreck Guildford’. There were campaign leaflets, press releases and a Declaration which was co-signed by Anne Milton and delivered by the signatories to GOSE (the Government Office
for the South East, which no longer exists). The 422 number is not given as an option in the paper, but we understand that other LA’s in Surrey have successfully used their final SEP allocations. The average figure of 444 dwellings per year of option 2 is close to the 422 of the SEP.

Nothing much has changed locally on the ground since the SEP, but there is at present no furore about housing numbers similar to that of 2008 and 2009. The main differences between then and now are (a) that no single housing number has yet been proposed and (b) that instead of suggesting that extra housing be concentrated on one Green Belt site to the N.E. of Guildford, a multitude of potential sites all over the Borough have been identified as possible housing sites. As a result, local campaigns to protect individual sites have sprung up (e.g. ‘E22 and E23’, ‘Save the Hogs Back’, and campaigns at Burpham and Fairlands to name a few).

Option 4, 204 homes per year, the lowest option, would provide for the natural growth of the Borough and a flux of equal numbers of people in and out of the Borough. In addition to this most people would probably support provision of more affordable housing. Both could be accommodated within the 322 figure or thereabouts. The natural growth would also provide a useful addition to the active labour supply. One approach would be to plan for natural growth and to target the number of years to remove the affordable housing priority backlog of 2090.

Referring to the Issues and Options paper paragraph 9.16, the first four boxes would give 3,302 + 160 + 269 + 2,004 = 5,735 homes, 287 new homes per year over 20 years. Using additional land in the west would increase this to 8,287, 414 homes per year. It would not be necessary to ‘Use countryside’ or ‘expand’ or ‘create a new village’.

We conclude that a choice from the lower end of the range of options is defensible and would limit the damage to the Borough.
### SUMMARY TABLE. All figures are averages for 2011 to 2031.

In order of decreasing dwellings per year

<table>
<thead>
<tr>
<th>Scenario</th>
<th>A: dwellings per year</th>
<th>B: dwellings per year</th>
<th>Average of A &amp; B dwellings per year</th>
<th>A: Population change per year</th>
<th>B: Population change per year</th>
<th>A: Net inward migration per year</th>
<th>B: Net inward migration per year</th>
</tr>
</thead>
<tbody>
<tr>
<td>10. All needs</td>
<td>1,066</td>
<td>1,066</td>
<td>1,066</td>
<td>2,725</td>
<td>1,660</td>
<td>2,436</td>
<td>1,428</td>
</tr>
<tr>
<td>1. Govt’s 2011 projection</td>
<td>704</td>
<td>704</td>
<td>704</td>
<td>1585</td>
<td>739</td>
<td>1,365</td>
<td>560</td>
</tr>
<tr>
<td>11. Half affordable</td>
<td>644</td>
<td>644</td>
<td>644</td>
<td>1,585</td>
<td>739</td>
<td>1,365</td>
<td>560</td>
</tr>
<tr>
<td>3. Migration led</td>
<td>591</td>
<td>674</td>
<td>633</td>
<td>1,454</td>
<td>629</td>
<td>1,454</td>
<td>629</td>
</tr>
<tr>
<td>6. Jobs led (IER)</td>
<td>572</td>
<td>655</td>
<td>614</td>
<td>1,394</td>
<td>588</td>
<td>1,394</td>
<td>588</td>
</tr>
<tr>
<td>7. Jobs led (mid-range)</td>
<td>464</td>
<td>540</td>
<td>502</td>
<td>1,099</td>
<td>343</td>
<td>1,099</td>
<td>343</td>
</tr>
<tr>
<td>2. Govt’s 2010 projection</td>
<td>415</td>
<td>474</td>
<td>444</td>
<td>886</td>
<td>232</td>
<td>886</td>
<td>232</td>
</tr>
<tr>
<td>5. Jobs led (Exp.)</td>
<td>358</td>
<td>426</td>
<td>392</td>
<td>807</td>
<td>101</td>
<td>807</td>
<td>101</td>
</tr>
<tr>
<td>9. Dwellings led (SEP)</td>
<td>322</td>
<td>322</td>
<td>322</td>
<td>714</td>
<td>30</td>
<td>546</td>
<td>109</td>
</tr>
</tbody>
</table>

| 11. Half affordable       | 644                   | 644                   | 644                                 | 1,585                       | 739                           | 1,365                           | 560                             |
APPENDIX 4 – SETTLEMENT PROFILE REPORT COMMENTS

Introduction

This analysis is based upon The GBC Settlement Profiles Report and it aims to ensure the picture being painted of each settlement is as complete as possible. The Profiles Report should explain some of the pressures on infrastructure, whilst differentiating between historic qualities of original hamlets, villages and towns and the communities that have grown up around them (largely during the twentieth century). The links, the spaces and the surroundings are also critical elements.

In recognition that the entire Borough will be called upon to find a substantial number of housing sites across its area during the Local Plan period, this analysis seeks (without fear or favour) to prompt a review by each community to consider how it might be affected by extension - both favourably and unfavourably. For example, a settlement such as Gomshall notes that it “is adequately served, with some appropriate facilities, but there are concerns that the bus, post office and village shop are underused and the village club is just surviving” (our emphasis). This seems as though it should prompt analysis by the community as to how much additional development might enable the community facilities to thrive without adversely affecting the character, setting and even scale of the settlement.

Where major settlement changes would occur by the extension of the settlement or the loss of facilities, the residents should be actively encouraged to engage in a proactive debate, and it is to be hoped they feed their comments, issues and options into their responses to this Consultation.

There are also tight green belt restrictions around many of the settlements. The green belt boundaries were drawn to prevent spread, sprawl and convergence of settlements. There will inevitably be cause to reassess the green belt boundaries (and these will probably come within a
specific green belt paper as part of the evidence base. Any changes suggested to the green belt boundary under the Local Plan - and especially arising from consideration of each and every settlement - should be designed to be a permanent realignment and not part of a progressive or ongoing expansion of an inconvenient boundary. Each settlement should view its own area in its wider context - and particularly taking account of the responses and aspirations of its neighbouring settlements.

Taking into account global planning practices and applying local knowledge and emotion, the Local Plan should identify:

- Settlement centres and latent centres;
- Places that need repair;
- The way in which and extent to which the wholeness of a settlement is faltering or defective;
- How to build or reinforce a neighbourhood or settlement so as to repair and heal the land and/or community.

This means that the Local Plan process should embrace at its heart the aim always to make the place better than it is at present. This may be obvious, if we are dealing with a part of the town in need of regeneration; but an extraordinary aim if we are faced with a place of great natural beauty. Yet there, too, we must make our target and our determination that when all is said and done, it will be more beautiful, and even better than it is today. (paraphrased from www.livingneighborhoods.org)

The ethos and approach above was embraced in the first two phases of a development outside Bishops Castle in Shropshire called The Wintles where the driver behind this high quality neighbourhood-based eco-friendly development was The Living Village Trust. The emphasis there is on quality rather than profit and this principle is included here since we have high land values in our part of the country which might attract development in the wrong places, encouraged by a highly profitable change of land use. Guildford Borough should be setting the highest standards for its settlements, and each infilling or extension scheme (or even any new settlement) should require similar principles to be adopted, whereby the extension is of a character and quality as good or better than the acknowledged heart of the original settlement.

The onus should be on land-owners and developers to give back a significant portion of windfall profit from gaining a planning consent for a change of designation from, say, agricultural to residential uses, and this should be enshrined in the planning policies promoted under the Local Plan.
The Profile Report

The Settlement Profile Report goes a little way towards identifying characteristics, but it does not explicitly lay down the gauntlet to the communities to identify development sites nor to look for qualitative tests in future planning policy that will protect and enhance their communities. It does not give any indication for each settlement how to add to the built environment in a way that also enriches the settlement. It does not call for the connections and infrastructure that will enable each neighbourhood and settlement to thrive.

In general, the Settlement Profile Report is somewhat static in nature and does not give enough of a flavour of how life operates in the settlements. For example, the report highlights where services are provided in the settlement and where they are missing. It does not consider where the nearest available (alternative) facilities are located. It does not take account of which surrounding settlements rely upon the local amenities and facilities of any particular settlement and, in the case of, say, East Horsley, it refers to the two parades of shops and their related parking and, rather than setting out how many car parking spaces are available versus need, it meekly notes that “the centre could benefit from some more available spaces.”

There are frequent references to the Thames Basin Heaths Special Protection Area (2009-2014) which will have expired by the time the Local Plan is prepared. Given that the SPA touches on many settlements in this report, what (if anything) is the likely successor or extension to TBH SPA (2009-2014) expected to alter?

Each settlement report should indicate the land area within the settlement boundary and typical and/or average dph (dwellings per hectare) figures so as to help understand the character of the settlement or its distinct parts and to ensure the character is not undermined by development which is out of keeping with its surroundings.

Crucially, the Profile Report does not seem to draw on information from the 2011 Census which would identify the population profile (age, gender, ethnicity, etc) for each settlement; nor does it use any of the lifestyle data from the census to underscore the nature of the community with a wider source of comparative data.

In further iterations of the Settlement Profile Report it is to be hoped some of this supplemental information will appear (as it does not emerge from the Infrastructure Baseline Report).

Taking each village in turn:
Albury

The conclusion drawn is that Albury is a settlement with a village core and a number of outlying hamlets. The infrastructure is poor because of the dispersal of settlements within Albury.

There is an emphatic statement in the Conclusion “If we were to remove the settlement boundary within the new Local plan then we would remove the scope for future infill development.” This does not seem to be a wholly logical statement to a non-planner and the difference between Green belt Villages with or without settlement boundaries needs explanation - probably in the introduction.

Perhaps the choice that the remaining text highlights is ‘Do we look for a suitable site for limited extension of the village - to help make better infrastructure and facilities viable and to bring forward affordable housing - or should we assume there will be limited growth through periodic infilling?’ If the latter, how do we ensure that sufficient affordable housing comes forward to suit the identified needs of the community?

The references to the views into and from Albury and the characteristic of its woodland and open pasture mix should help to ensure that only suitable sites can be brought forward. A range of qualitative requirements (and the Community Infrastructure Levy of which 15% would go to the Parish) should ensure that there is not so much windfall value in speculatively promoting unsustainable or undesirable sites.

Ash & Tongham Urban Area

In the section on Retail Facilities, there is reference to car parking for 29 cars. This does not indicate whether the provision is too little, about sufficient or generous. For the purposes of understanding the capacity for the local infrastructure to cope with fresh development, these kinds of information would be very important.

Ash & Tongham is close to the Local Authority boundary with Rushmoor and care should be taken to understand what (if any) impact there might be as a result of the Duty to Co-operate set out in NPPF.

The conclusion that Ash & Tongham “could support a level of development in the future which exceeds that of any of the Borough’s other settlements with the exception of Guildford urban area” seems to be made without reference to opportunities and risks of such expansion, nor on the basis of any assessment of CAPACITY. This is not to say the assessment is wrong, but that it does not logically arise from the information provided. How well are the local businesses trading, for example, and what level of development can help to ensure or enable the medium to long term viability of those businesses.
Ash Green

There is a hint of potential major development between Ash Green and Ash & Tongham, noting that "this strategic matter will be addressed in the Local plan Strategy and Sites document". The Settlement Profile Report should consider the scale of development that might be required to raise the village from 'Fair' to 'Good' and the implications on the village character if the settlements of Ash Green and Ash & Tongham were to merge or infill.

Chilworth

The description of Chilworth as "an urban character without a core and with very limited opportunity for infilling, constrained by the railway which cuts it in half and the green belt boundary which is drawn very tightly" suggests that there is no scope for development.

There is an apparent conflict, however, between statements in the sections 'How well the village works' and the 'Conclusion' namely and respectively: "The village is poorly served, with a lack of appropriate facilities..." and "Chilworth has a number of key community services and facilities which makes it one of the more sustainable villages".

Perhaps the choices that the remaining text highlights are: 'Do we (a) look for a suitable site for limited extension of the village - to help make better infrastructure and facilities viable and to bring forward affordable housing; (b) consider the potential to redraw the green belt boundaries to enable high quality development that brings a more cohesive connected community with a more conventional mass and provides key local community amenities at the heart of the settlement; or (c) should we assume there will be limited growth through periodic infilling? If the latter, how do we ensure that sufficient affordable housing comes forward to suit the identified needs of the community?'

The characteristic of its woodland and open pasture surroundings set against the downs should help to ensure that only suitable development can be brought forward. A range of qualitative requirements (and the Community Infrastructure Levy of which 15% would go to the Parish) should ensure that there is not so much windfall value in speculatively promoting unsustainable or undesirable sites.

Compton

This green belt village has a significant number of listed buildings (around 9%) and is mostly within a conservation area. It has traffic from the A3 cutting through it and could be affected by alterations to the A3 around Guildford (improvements may encourage more traffic from the South to access the A3 through Compton, and suitable mitigation strategies may be required alongside any such proposals in the Local Plan).
Compton abuts the Local Authority boundary with Waverley and, care should be taken to understand what (if any) impact there might be as a result of the Duty to Co-operate set out in NPPF.

Compton does not have convenience shops but is served by bus services. The conclusion in the draft is that “it is not a sustainable location for an extension” but perhaps the report should offer alternatives for residents to consider ‘Do we (a) look for a suitable site for limited extension of the village - to help make better infrastructure and facilities viable and to bring forward affordable housing; (b) consider the potential to redraw the green belt boundaries to enable high quality development that brings a more cohesive connected community with a more conventional mass and provides key local community amenities at the heart of the settlement; or (c) should we assume there will be limited growth through periodic infilling?’ If the latter, how do we ensure that sufficient affordable housing comes forward to suit the identified needs of the community?

**East Clandon**

This green belt village has a significant number of listed buildings (around 45%) and is mostly within a conservation area. The village is an ancient settlement clustered around the church, pub and village hall just off the A246 Epsom Road.

There seems to be a contradiction where, under ‘Community Services’, the text says “the settlement is also lacking key community facilities and services such as a doctor’s surgery, a post office or any shopping facilities” and under ‘How Well the Village Works’ the text says “The village is reasonably served with facilities but access is minimal”.

There are two options considered for East Clandon, whereas perhaps a third option might be to look for a suitable site for limited extension of the village - to help make better infrastructure and facilities viable and to bring forward affordable housing. Clearly this would be difficult to achieve and an extensive range of qualitative requirements (and the Community Infrastructure Levy of which 15% would go the Parish) should ensure that there is not so much windfall value in speculatively promoting unsustainable or undesirable sites.

**East Horsley**

East Horsley is a large and relatively populous settlement. The report notes that “the only service the settlement lacks is a secondary school” but the report does not indicate whether this is an aspiration or if the residents are happy to frequent nearby schools in Effingham. Equally, the report does not indicate how East Horsley’s population measures up to justifying having one. This should probably cross reference (or be cross-referenced with) the Infrastructure Baseline.
The report discusses the two local centres but does not provide a count of shop units, numbers of parking spaces or even provide qualitative data on the viability of the shops. Equally, there is no indication as to whether the customers for those facilities are drawn from the settlement or from further afield (see comments on Effingham, Ockham and West Horsley, for example).

The conclusion states that “if suitable sites are found within this area it could support additional housing development in the future”. Given the relatively low number of buses, and the availability of train services from two stations and local shopping in two centres, the focus for any new development should perhaps be around the station(s) and/or close to the local facilities so as to limit or avoid incursions into the green belt, but a significant high quality extension could be considered with a once and for all change to green belt boundaries if it can be shown that the character of the settlement and its sustainability would not be impaired by such extension. Clearly this would be difficult to achieve and an extensive range of qualitative requirements (and the Community Infrastructure Levy of which 15% would go the Parish) should ensure that there is not so much windfall value in speculatively promoting unsustainable or undesirable sites.

**Effingham**

Effingham is located close to the Local Authority Boundary with Mole Valley and care should be taken to understand what (if any) impact there might be as a result of the Duty to Co-operate set out in NPPF.

The proximity of Effingham to East Horsley, and the presence in each centre of facilities for the residents, suggest that analysis should be undertaken as to whether there could be infilling between communities. This might allow a more cohesive view of community transport, facilities and amenities - especially as the village economy “is not seen as being particularly thriving”.

The conclusion notes that “Effingham is one of the largest villages in the borough and contains a number of key services and as such if suitable sites are found within this area it could support additional housing development in the future through an extension and a rural exception site to provide affordable homes for local people.” Clearly this would be difficult to achieve and an extensive range of qualitative requirements (and the Community Infrastructure Levy of which 15% would go the Parish) should ensure that there is not so much windfall value in speculatively promoting unsustainable or undesirable sites.

**Fairlands**

There is reference to Fairlands suffering from flooding in various locations but there is no indication whether this is fluvial or pluvial.
The conclusion states that "if suitable sites are found within this area it could support additional housing development in the future". The focus for any new development should perhaps be close to the local facilities so as to limit or avoid incursions into the green belt, but a significant high quality extension could be considered with a once and for all change to green belt boundaries if it can be shown that the character of the settlement and its sustainability would not be impaired by such extension. Clearly this would be difficult to achieve and, an extensive range of qualitative requirements (and the Community Infrastructure Levy of which 15% would go the Parish) should ensure that there is not so much windfall value in speculatively promoting unsustainable or undesirable sites.

This view may also be affected by any urban expansion of Guildford towards Fairlands, the potential for a Park Barn station and any northern realignment of the A3.

**Gomshall**

For a relatively small village settlement, Gomshall is well-served for facilities and amenities. The report does, however, note that "there are concerns that the bus, post office and village shop are underused and the village club is just surviving" (my emphasis).

The conclusion is then drawn that the village is "not a sustainable location for an extension."

On the contrary, this would seem to indicate that the village may need extension to make its facilities viable.

Perhaps the choices are 'Do we (a) look for a suitable site for limited extension of the village - to help make better infrastructure and facilities viable and to bring forward affordable housing; (b) consider the potential to redraw the green belt boundaries to enable high quality development that helps to ensure key local community amenities at the heart of the settlement remain viable; or (c) should we assume there will be limited growth through periodic infilling?' If the latter, how do we ensure that sufficient affordable housing comes forward to suit the identified needs of the community?

Clearly any extension would be difficult to achieve and an extensive range of qualitative requirements (and the Community Infrastructure Levy of which 25% would go the Parish) should ensure that there is not so much windfall value in speculatively promoting unsustainable or undesirable sites.

**Guildford Urban Area**

A population of just over half of the borough living in the Guildford Urban Area have been lumped together as one settlement and, collectively, characterised by being the only part of the Borough.
without parish or town council representation. For the size and complexity of the Guildford Urban Area, it has a relatively short entry in the Profile Report.

There are so many parts of the Guildford Urban Area whose characters and backgrounds are fundamentally different (as are their issues) and whose facilities and access vary considerably. No reference is made to the Neighbourhood Area of Burpham, and it might be reasonable to expect that other areas might choose to go down the same neighbourhood planning path.

It seems clear, therefore, that this section should be broken up into the sub-districts which have their own nuclei of facilities and transportation issues. These should probably include:

- Town Centre
- Guildford Park
- Onslow Village (including Dennisville)
- Park Barn
- Rydes Hill
- Woodbridge Hill
- Sloughton
- Stoke
- Bellfields
- Slyfield
- Burpham
- Merrow
- Charlotteville
- Warwicks Bench
- St Catherines

The section on Character seems to be woefully inadequate. The Urban Area is dissected also by the River Wey; also poorly connected is the west side of Guildford (including a large proportion of employment and education).

Under Community services and facilities there is an orphaned "Northern".

Under Retail and Employment, much of this section should cross refer to the Guildford Economic Strategy Report 2013 and the Infrastructure Baseline. Missing from this settlement report is some indication of the employment levels and where employees typically live - for example, a separate report on Park Barn would highlight some issues with higher than average unemployment.

Under Transport, the settlement report refers to the River Wey as "a transportation route primarily for recreation and tourism purposes". This is omitted from the Infrastructure
Baseline. Reference to the A3 should also highlight that it connects the town to the wider motorway network.

In sections 2.2.12-2.2.16 of the Infrastructure Baseline there is no specific mention of the A320 junction at Stoke Crossroads (but there is reference to the general fragile state of the road network at peak hours). In the Settlement Report it is mentioned that "The Stoke crossroads and junction with the A3 are already at their capacity. A lack of investment in associated junctions will continue to have an adverse effect on the communities and major businesses operating in the Guildford urban area."

This analysis - whilst on the one hand differing in content and tone from the Infrastructure Baseline, fails to deal equally with each approach road to the town - all of which have specific and severe issues. The Farnham Road (A31) for example, has restrictions of weight and is often backed up along its entire length from the Hog's Back.

The A3 backs up from the A31 to the Burpham turn at evening rush hour, due in large part to volumes of traffic and a 60m climb from its bridge over the River Wey to the cutting in the Hog's Back. This affects the businesses and quality of life and access for a large proportion of the settlement to the north and west.

In the Conclusion, there is the comment that Guildford "could support a level of development which exceeds that of any of the borough's other settlements". This may well be the case and there may be very difficult decisions to be taken about the future of the green belt boundary (note my comments in the introduction). These decisions should be taken on the basis of a much more detailed settlement assessment having subdivided the area as described above.

A decision, for example, to expand the town from Warwicks Bench would have to take account of a character assessment of that residential settlement whereby it has no immediately local facilities and would necessitate a trip into the town centre - with no bus routes available for public transport. On the other hand, an extension to Burpham might have good access to local services and facilities and reasonable access to public transport.

There needs to be a comprehensive CAPACITY study for the Guildford Urban Area and each subsidiary settlement to show how the infrastructure (outlined in the Infrastructure Baseline) can be upgraded to accommodate growth since so much of the settlement's infrastructure is already at or near (or even exceeding) its designed capacity.

In summary, in any event, the focus of development should be town centre first - residential sites like the recently lost Bellerby site should be resisted for non-residential uses. Where any outward expansion of Guildford is required for a new settlement or a settlement extension, the revised green belt boundary should be drawn so as to represent a new permanent boundary. Such extensions should probably be planned with a critical mass to enable local
services and facilities to be provided or where there are accessible services in existing settlements within easy access. Clearly any extension would be difficult to achieve and an extensive range of qualitative requirements (and the Community Infrastructure Levy) should ensure that there is not so much windfall value in speculatively promoting unsustainable or undesirable sites. As there is no Parish Council, it would be important to ensure that an adequate proportion of CIL goes to mitigate local effects of extension and to provide the necessary infrastructure.

**Holmbury St Mary**

Holmbury St Mary is located close to the Local Authority Boundary with Mole Valley and care should be taken to understand what (if any) impact there might be as a result of the Duty to Co-operate set out in NPPF.

The Report highlights that Holmbury St Mary is poorly designed as a settlement because “there have been too many extensions permitted and there is a need for affordable housing.” This implies that the settlement is effectively in need of repair and, whilst it is possible that too many extensions of inferior quality have failed to respect the character, fabric and scale of the settlement, that does not mean that a well-designed extension would be unable to heal some of the issues and restore a better quality of community to the settlement. Clearly any extension would be difficult to achieve and an extensive range of qualitative requirements (and the Community Infrastructure Levy, 15% of which would go to the Parish Council for local infrastructure projects) should ensure that there is not so much windfall value in speculatively promoting unsustainable or undesirable sites.

**Jacobs Well**

The Report (at ‘Character’) notes that “the settlement has an urban character due to its proximity to the urban area of Guildford, at its closest it is 200m away from the norther edge of Slyfield.”

Perhaps, as part of the Local Plan process, there should be consideration given to what would be the merits or harm in closing the 200m gap and infilling the area between Slyfield and Jacobs Well. Clearly any extension or infilling such as this would be difficult to achieve and an extensive range of qualitative requirements (and the Community Infrastructure Levy, 15% of which would go to the Parish Council for local infrastructure projects) should ensure that there is not so much windfall value in speculatively promoting unsustainable or undesirable sites.
Normandy and Flexford

Whilst the Report puts these together, it is somewhat schizophrenic in its attempts to combine and yet treat these two areas separately. No such schizophrenia applies to the Report's treatment of the Guildford Urban Area (see above).

The Report notes the lack of a convenience shop "which would be of benefit to the local community". There is no reference as to the options available for convenience shopping for residents of the two areas.

Perhaps, as part of the Local Plan process, and because the two areas see themselves as one settlement, there should be consideration given to what would be the merits or harm in infilling the area between them, incorporating a convenience store and some of the other missing facilities. Clearly any infilling such as this would be difficult to achieve and an extensive range of qualitative requirements (and the Community Infrastructure Levy, 15% of which would go to the Parish Council for local infrastructure projects) should ensure that there is not so much windfall value in speculatively promoting unsustainable or undesirable sites.

Ockham

Ockham is located close to the Local Authority Boundary with Mole Valley, and care should be taken to understand what (if any) impact there might be as a result of the Duty to Co-operate set out in NPPF.

Under ‘Transport’ there is reference to a school bus service passing through once a day. This presumably means once at each end of the day and does not specify which schools it serves, nor whether it meets the needs of the school age children in the community.

The Report does not give any great weight to links between Ockham and East Horsley (recognising it as "the nearest area with services") and ignores any such links with the larger centre of Ripley. The Report also fails to establish how interaction with such centres works in practice other than to highlight reliance on the private car.

Ockham is around double the size of Holmbury St Mary which, unlike Ockham, has a settlement boundary, and, whilst the Report concludes that Ockham does not have the facilities to support sustainable development, the question should be asked whether it would benefit from a significant extension that made such facilities viable - always assuming a suitable extension could be found. Perhaps a new settlement on Wisley Airfield might fulfill this purpose and, properly planned and on a significant scale, could provide a new service centre with local shops, etc. Clearly any such extension would be difficult to achieve and an extensive range of qualitative requirements (and the Community Infrastructure Levy, 15% of which would go to the Parish...
Council for local infrastructure projects) should ensure that there is not so much windfall value in speculatively promoting unsustainable or undesirable sites.

**Peaslake**

From the description in the Report, the village of Peaslake seems to be settled in a mould whereby there is nothing for young people to do, and nowhere for them to live if they wish to remain in the village to raise their families. Ordinarily this might be described as a poorly functioning and unsustainable community.

The physical limits and the AONB designation almost certainly dictate that little scope exists for any substantial development.

On the other hand, as a settlement, Peaslake may well benefit from additional development which could help support services or transport connections. Clearly any such extension would be difficult to achieve and an extensive range of qualitative requirements (and the Community Infrastructure Levy, 15% of which would go to the Parish Council for local infrastructure projects) should ensure that there is not so much windfall value in speculatively promoting unsustainable or undesirable sites.

**Peasmarsh**

The Report barely acknowledges the existence of Godalming and ignores Farncombe, and yet Peasmarsh sits at the edge of Guildford Borough, close to its Local Authority boundary with Waverley, and reasonably close to Farncombe.

As it is located close to the Local Authority Boundary with Waverley, care should be taken to understand what (if any) impact there might be as a result of the Duty to Co-operate set out in NPPF.

There is some confusion in the ‘Transport’ section about rail connections and destinations: “The nearest train station is Shalford, 1.5km to the north east. This line links Guildford town and London Waterloo and is faster than the direct train from Guildford to London”. Clearly this requires rewriting.

The Report notes that Peasmarsh contains five of the 12 key community services (with no reference as to where the nearest missing services are to be found), whereas under the section ‘How well the village works’ the text notes that “the village is poorly served with a lack of appropriate facilities”. These two statements do not appear to be consistent.
Perhaps there has been overzealous use of cutting and pasting in the Report - as demonstrated by the sentences in 'Conclusion':

1. "Peasmarsh is a relatively small settlement and does not contain many key community services or facilities (small village)" This contradicts the earlier comments.
2. "The closest convenience store is located in East Horsley and due to poor public transport is mainly accessible by the private vehicle" This is patently geographically wrong.

Every settlement should be reviewed to ensure the data is relevant to that settlement and not a misplaced 'pasting' of some other settlement's criteria.

Peasmarsh is characterised as a "suburban village" and yet is treated as a more protected settlement (from infilling or extension) than many others. The Local Plan process should consider whether it could accommodate any significant development by a well-planned extension that helped bring the missing services or facilities to the settlement. Clearly any such extension would be difficult to achieve and an extensive range of qualitative requirements (and the Community Infrastructure Levy, 15% of which would go to the Parish Council for local infrastructure projects) should ensure that there is not so much windfall value in speculatively promoting unsustainable or undesirable sites.

**Pirbright**

This is the only settlement in the Report that lists the total area as well as the number of dwellings, allowing a calculation of average settlement density - there are 565 dwellings in 1906 hectares. This clearly does not cover the settlement area alone, measuring the density in hectares per dwelling rather than dwellings per hectare!

Pirbright is located close to the Local Authority Boundary with Woking, and care should be taken to understand what (if any) impact there might be as a result of the Duty to Co-operate set out in NPPF.

Under the section 'Community services ...' (which in this settlement are amalgamated whereas elsewhere they are in separate subheadings) there is an apparent contradiction whereby we have "one comparison shop" and then "comparison shops within the settlement".

The settlement is characterised by a collection of hamlets and the Local Plan process should consider whether, perhaps, these could accommodate well-designed extensions, drawing on the availability of accessibility and services in the heart of the village. Clearly any such extension would be difficult to achieve and an extensive range of qualitative requirements (and the Community Infrastructure Levy, 15% of which would go to the Parish Council for local..."
infrastructure projects) should ensure that there is not so much windfall value in speculatively promoting unsustainable or undesirable sites.

**Puttenham**

Puttenham is a poorly served village owing to its lack of a post office or village shop, which forces residents (in the absence of buses) to go by car to Guildford or Godalming.

Perhaps the Local Plan process should consider an expansion on the east side (protecting the historic heart of the village) on the other side of the main road with traffic calming and with a village centre that could provide the facilities and services that are so lacking. This could be designed as a high quality rural settlement and would require the redrawing of the Green Belt boundary. This needs also to respect the Area of Great Landscape Value. Clearly any such extension would be difficult to achieve and an extensive range of qualitative requirements (and the Community Infrastructure Levy, 15% of which would go to the Parish Council for local infrastructure projects) should ensure that there is not so much windfall value in speculatively promoting unsustainable or undesirable sites.

**Ripley**

Ripley is located close to the Local Authority Boundaries with both Woking and Mole Valley, and care should be taken to understand what (if any) impact there might be as a result of the Duty to Co-operate set out in NPPF.

Ripley is affected by the way the A3 bypassed it and by the single direction junctions at each end which drives traffic through the settlement. On the one hand this may be a good way to ensure the village is visited and thrives; on the other hand, the through traffic may adversely affect the character of the settlement itself.

Under 'Conclusion' the Report should encourage consideration as to whether a significant high quality extension could be accommodated without adversely affecting the character and "market town" feel of Ripley as a settlement. Clearly any such extension would be difficult to achieve and an extensive range of qualitative requirements (and the Community Infrastructure Levy, 15% of which would go to the Parish Council for local infrastructure projects) should ensure that there is not so much windfall value in speculatively promoting unsustainable or undesirable sites.

**Seale and The Sands**

Under the heading 'Form', the final sentence "...and consists of low density" does not quite make sense.
Seale and The Sands are located close to the Local Authority Boundary with Waverley, and care should be taken to understand what (if any) impact there might be as a result of the Duty to Co-operate set out in NPPF.

The Report does not venture to suggest where (and how far away) residents have to go to reach the nearest facilities that these areas do not provide.

Seale and The Sands may well benefit from additional development which could help support services or transport connections. Clearly any such extension would be difficult to achieve and an extensive range of qualitative requirements (and the Community Infrastructure Levy, 15% of which would go to the Parish Council for local infrastructure projects) should ensure that there is not so much windfall value in speculatively promoting unsustainable or undesirable sites.

Send

Send is located close to the Local Authority Boundary with Woking, and care should be taken to understand what (if any) impact there might be as a result of the Duty to Co-operate set out in NPPF.

Despite its proximity to Ripley, Send is described (under 'Transport'): "despite its size, there is a limited bus service that runs through the settlement between Woking and Guildford town."

The Local Plan process should consider whether it could accommodate any significant development by a well-planned extension that helped bring better transport services to the settlement or improve the viability of the local facilities. Clearly any such extension would be difficult to achieve and an extensive range of qualitative requirements (and the Community Infrastructure Levy, 15% of which would go to the Parish Council for local infrastructure projects) should ensure that there is not so much windfall value in speculatively promoting unsustainable or undesirable sites.

Send Marsh/Burntcommon

Send Marsh is located close to the Local Authority Boundary with Woking, and care should be taken to understand what (if any) impact there might be as a result of the Duty to Co-operate set out in NPPF.

Under 'Character' there is reference to the slip road from the A3 leading into the settlement. It should perhaps be noted that this only feeds from the northbound carriageway of the A3.

Whereas Send is described as semi-rural, Send Marsh is described as having a "suburban character", and under 'Transport' the bus service which in Send is described as 'limited' is
considered to be 'reasonable'. Under 'how well the village works', however, the Report says: "Send Marsh scores very poorly as public transport is very limited".

The Local Plan process should consider whether it could accommodate any significant development by a well-planned extension to help bring better transport services to the settlement and to develop the village economy which "is not seen as being particularly thriving". Clearly any such extension would be difficult to achieve and an extensive range of qualitative requirements (and the Community Infrastructure Levy, 15% of which would go to the Parish Council for local infrastructure projects) should ensure that there is not so much windfall value in speculatively promoting unsustainable or undesirable sites.

**Shackleford**

Shackleford is located close to the Local Authority Boundary with Waverley, and care should be taken to understand what (if any) impact there might be as a result of the Duty to Co-operate set out in NPPF.

The Report notes that Shackleford Parish Council has recently completed a rural housing needs survey - and yet it does not give any indication as to what the survey found. This seems to be an unfortunate omission.

The Report - as described earlier - is a static summariser of dynamic communities. The 'Conclusion' notes that "Shackleford contains a very few community services and facilities (loose knit/hamlet) and as such is not a sustainable location for additional development.".

On the contrary, the Local Plan process should question the viability of local shops and a post office if there is no growth - the risk from internet shopping and from surrounding towns and villages will put increasing pressure on them. Consequently, the Report should consider the economic argument for extending the settlement with high quality, complementary development in keeping with the character and scale of the existing properties. This would require a rethinking of the Green Belt boundaries and this should be designed to meet future needs once and for all. Clearly any such extension would be difficult to achieve and an extensive range of qualitative requirements (and the Community Infrastructure Levy, 15% of which would go to the Parish Council for local infrastructure projects) should ensure that there is not so much windfall value in speculatively promoting unsustainable or undesirable sites.

**Shalford**

Despite its size (and perhaps due to its proximity to Guildford or Waitrose in Godalming) Shalford has a medium-sized local centre but no convenience or grocery store. This factor means that
Shalford scores only 20 out of 40 - the same as Albury - this suggests a substantial underperformance in Shalford relative to expectations.

The Local Plan process should consider whether Shalford and surroundings could accommodate any significant development by a well-planned extension to help to develop the village economy which "is not seen as being particularly thriving" and to provide the scope for a convenience store. Clearly any such extension would be difficult to achieve and an extensive range of qualitative requirements (and the Community Infrastructure Levy, 15% of which would go to the Parish Council for local infrastructure projects) should ensure that there is not so much windfall value in speculatively promoting unsustainable or undesirable sites.

Shere

Shere is an important village with a heritage celebrated internationally through its use as a backdrop in films and its 'chocolate-box' village centre.

Whilst there is no designation above a Conservation Area, Guildford should, perhaps think in terms of establishing a 'Local heritage' designation whereby street-scenes are treated as if they are listed. Views into and out of the village will be of great importance as well.

Under 'Transport' the report notes that "Shere has a good bus service", whereas at 'how well the village works' "Shere scores poorly as public transport is limited". Such contradictions are not helpful in assessing the needs of the village.

Under 'Conclusion' the text notes that "development is limited to infilling..." and that "if a suitable site can be found, there is scope for a rural exception site to provide affordable homes for local people".

These references should be heavily qualified in respect of Shere to the extent that infilling or a rural exception site should respect the heritage qualities and visitor attraction of the village centre, and this should mean that there should be an exceptionally high threshold for quality design in keeping with the historic settlement.

On the other hand, the Local Plan process should consider whether Shere and surroundings could accommodate any significant development by a well-planned extension to help to develop the village economy which "is not seen as being particularly thriving", which itself would help to preserve the character and vitality of the village. Clearly any such extension would be difficult to achieve and an extensive range of qualitative requirements (and the Community Infrastructure Levy, 15% of which would go to the Parish Council for local infrastructure projects) should ensure that there is not so much windfall value in speculatively promoting unsustainable or undesirable sites.
Wanborough

Wanborough is close to the settlement of Flexford (reported alongside Normandy as being regarded as a single settlement).

The proximity of Wanborough to Flexford should be taken into account when considering whether there could be any extension to the settlement and it should probably be the case that this should only happen between these two villages. Clearly any such extension would be difficult to achieve and an extensive range of qualitative requirements (and the Community Infrastructure Levy, 15% of which would go to the Parish Council for local infrastructure projects) should ensure that there is not so much windfall value in speculatively promoting unsustainable or undesirable sites.

West Clandon (North and South)

The two parts of West Clandon are separated by the railway (one road bridge links the two). This should be noted as a severed community in the context of the Infrastructure Baseline. Equally, the station at West Clandon could be treated as more of a village hub and could be regenerated to provide local convenience shopping - identified as lacking in the Settlement Profile Report.

There is an extraordinary statement in the report to the extent that “West Clandon scores poorly as public transport is limited to travelling by train to either Guildford town or London”. This would seem like a well-connected settlement by many yardsticks. Perhaps there needs to be a greater availability of low-cost tickets between Clandon and Guildford (London Road) so as to enable the connection to work better but not so as to increase any passenger burden on Guildford mainline station.

The report concludes (among other things) that "this raises the question as to whether an extension to the village could enable service improvements through future mixed use development and improve access to key services for local residents."

Indeed, the Local Plan process should consider whether West Clandon could accommodate any significant development by a well-planned extension to help to introduce the missing facilities and to develop the village economy which "is not seen as being particularly thriving". Clearly any such extension would be difficult to achieve and an extensive range of qualitative requirements (and the Community Infrastructure Levy, 15% of which would go to the Parish Council for local infrastructure projects) should ensure that there is not so much windfall value in speculatively promoting unsustainable or undesirable sites.
West Horsley (North and South)

The two parts of West Horsley are separated by the railway (two road bridges link the two). This should be noted as a severed community in the context of the Infrastructure Baseline, but unlike West Clandon, it does not benefit from the station - the nearest being at East Horsley.

The Report notes that East Horsley and West Horsely parish councils recently completed a joint rural housing needs survey. The authors do not see fit, however, to set out the perceived requirement in this Report.

The Report does consider West Horsley to be "the most sustainable rural settlement in the Borough" and highlights the potential to support additional housing development in the future. Clearly any such extension would be difficult to achieve and an extensive range of qualitative requirements (and the Community Infrastructure Levy, 15% of which would go to the Parish Council for local infrastructure projects) should ensure that there is not so much windfall value in speculatively promoting unsustainable or undesirable sites.

Wood Street Village

Wood Street is located "just to the west of Guildford" and could be somewhat affected by an extension of the Guildford Urban Area on its western reaches. The village works well, scoring highly despite having public transport "so poor that residents have to rely on the private car".

There may well be scope for a significant extension and could be linked to rail services if Park Barn Station were to become a reality. Clearly any such extension would be difficult to achieve and an extensive range of qualitative requirements (and the Community Infrastructure Levy, 15% of which would go to the Parish Council for local infrastructure projects) should ensure that there is not so much windfall value in speculatively promoting unsustainable or undesirable sites.

Worplesdon

Worplesdon is located close to the Local Authority Boundary with Woking, and care should be taken to understand what (if any) impact there might be as a result of the Duty to Co-operate set out in NPPF.

The Report highlights that "there is a poor bus service that serves the settlement". Perhaps the Council should consider whether a Park & Ride facility with a combined bus service could improve this situation.

The Report notes that Worplesdon parish council recently completed a joint rural housing needs survey. The authors do not see fit, however, to set out the perceived requirement in this Report.
Worplesdon is identified as a settlement which would support potential extension. Clearly any such extension would be difficult to achieve and an extensive range of qualitative requirements (and the Community Infrastructure Levy, 15% of which would go to the Parish Council for local infrastructure projects) should ensure that there is not so much windfall value in speculatively promoting unsustainable or undesirable sites.

**Conclusion**

Having been through the document carefully, there are clearly some contradictions and some glaring ‘cut and paste’ errors. It is important that these are ironed out before the Local plan is developed from a compromised baseline.

The main concern about the Settlement Profile Report is the treatment of the Guildford Urban Area as one amorphous settlement. That is not only plainly wrong, it also misses a clear opportunity to look at the impact of extensions to subdivisions of Guildford which the Strategic Housing Land Availability Assessment seeks to do. It also means that a close focus on the separate issue of Guildford Town centre and on each of its surrounding suburban settlements is much harder to achieve.

This shortcoming also, therefore, fails to note the establishment of the Burpham Neighbourhood Forum.
APPENDIX 5 – RESPONSE TO SA SCOPING REPORT
(copy of Gsoc Response submitted by Martin Taplin to be provided)
APPENDIX 6 – GVG VISION DOCUMENT
GUILDFORD ON THE WAY:
A VISION FOR GUILDFORD IN 2030 & BEYOND

Prepared by the Guildford Vision Group
October 2013
Encouraged by Council initiatives, Guildford is about to embark on an unprecedented period of change and development. The latter has the ability to significantly alter the future character of Our Town for either good or bad.

Our Town must seize these exciting opportunities while preserving the vital character that has sustained its success over many generations. The development opportunities are unparalleled in the South East of England. But the benefits may easily be lost if not appropriately managed.

*Guildford Vision Group* has set out a Vision of how Our Town might be in 2030 when the development work has been successfully completed. This is part of its Master Plan ambition to ensure Guildford gets high quality development on North Street and elsewhere. This Vision is also endorsed by The Guildford Society.

At key points during the rest of 2013, the Council will be consulting on a new Local Plan for Guildford Borough. This will be the primary document for Borough planning that will shape development of Our Town over the next decade.

We believe it is vital for the future success and vitality of Our Town that a high quality plan emerges. To be successful, this plan must meet the needs of residents, students, businesses and visitors alike. However such a plan will only emerge if the people of Our Town get actively involved in the consultation process that accompanies its preparation.

In response to the Council's call for all people to be involved in determining the future shape of Our Town, we have included a series of postcards sent by current residents of Guildford as if from Guildford of the future, illustrating what has made it successful. These postcards are summarised in our 'To Do' key actions on Page 6 that will underpin the bright future we all seek for Our Town.

We strongly encourage you to respond to the Council's call to make your views known too. One way is to send us your postcard where you set out what you want to see as the principal components of a successful Guildford in the future. Send it to either of the email addresses below and we will collate them all and publish a summary. The deadline is 22nd November 2013. We will then deliver the summary to the Council.

Thank you in advance for your commitment to the future success of Our Town and for sharing your vision.

John Rigg
Chairman, Guildford Vision Group
vision@guildfordvisiongroup.com

Bill Stokoe
Chairman, The Guildford Society
vision@guildfordsociety.org.uk
Our Vision

Guildford in 2030 and beyond is the location of choice in the South East for people of all ages and talents to live, study, work and play.

It is a vibrant, sustainable community; an attractive destination for visitors; and an economically dynamic, global hub for knowledge businesses that create more and better employment opportunities.

It is a special place that has built successfully on its heritage and embraces future opportunities.
**Expanding on Our Vision**

Guildford in 2030 works extremely well and is very attractive to residents and visitors. It is economically dynamic and attracts new, high-value businesses. It has first class education facilities and offers great employment opportunities.

Four strands define its attraction and make it a magnet:

- The town centre is beautiful. Good modern County Town architecture, green spaces and pleasant public areas abound. Pavement cafés and restaurants, great entertainment facilities, historic buildings, heritage sites and a high quality retail experience all deliver an experience without parallel in the region. Attractive town centre residential developments help create a town that lives.

- Residents, visitors, employees and students enjoy the freedom of a town centre where pedestrians and cyclists move easily and safely between the High Street, Station, University and Cathedral along pleasant dedicated pathways. Traffic is routed away from the centre and any central parking is underground. Transport modes are well co-ordinated and respect the environment.

- The town celebrates its river setting and the soothing ambience. Open, welcoming spaces let people meet, sit and chat, enjoy regular outdoor concerts, and take part in a range of leisure and sporting activities.

- Set in glorious countryside, it is the perfect regional hub; it enjoys easy access to the motorway network and excellent rail links to London, its airports and the coast.
Enabling Our Vision

GBC is shortly to draft a new Local Plan for our town. This will have a profound impact on the future development of Our Town’s economy, housing and urban landscape.

Critical to realising Our Vision for Guildford is the preparation of a well thought out masterplan for the town centre which is well integrated with the Local Plan.

On subsequent pages, we set out glimpses in the form of postcards from the future of how Our Town might be in 2030 were Our Vision to be implemented. These and other ideas need to be developed as part of a community engagement process and we welcome the additional thoughts and contributions of readers.

Further details of Our Vision for Guildford are provided in a separate Annex to this presentation which is available on request.
Every good Master Plan sets out to identify issues and priorities…

…it would be typical for this to flow from a wide discussion with the community and stakeholders. This would then be set out as a set of objectives for the Master Plan itself.
TRANSPORT & CONNECTIVITY

AT THE HEART OF CREATING A REVITALISED TOWN
Our Vision in Practice—Transport

Infrastructure is improved and vehicle traffic no longer dominates

- Each of Our Town’s major nodes including the University and town centre are well connected.
- Re-engineered transport and communication are at the heart of creating a revitalised town.
- Re-modelled highways combined with a more sustainable car parking strategy have created better options for residents to travel within the town; for visiting motorists; and for those wishing to bypass the town.
- The beautiful town centre is no longer blighted by congestion, there is lower pollution and increased safety for pedestrians.
- Residents and visitors, employees and students enjoy the freedom to easily navigate the town centre.
Great to be back in Guildford.

It was easy to travel between the major town centre locations and outlying areas.

I took the tram to the Cathedral, University and Research Park – amazing how many world-class companies are based there!

Students used to only be seen in Guildford when everyone else had left the centre, but now they are fully integrated – some even live in the North Street development - and are a key part of Guildford.

Because it is now accessible, the Cathedral hosts more major events and there is a visitors’ centre at the Research Park.

There are even walk-in healthcare and minor A&E facilities right in the town centre.

Awesome! It’s become a really well-connected community.
Just visited Guildford and found the town centre has been bypassed and is traffic free.

I came straight off the A3 into a park and ride and got onto the driverless train which called at the Research Park, Hospital, Park Barn, University and Cathedral. It also stopped at the main station and connected with Heathrow and Gatwick!

The town centre was for buses only. A new bridge takes traffic over the railway and river and car parking is all underground!

But I chose to walk. I loved the pedestrianised area from station to shops and High Street and better signposting and reduced traffic mean walking and cycling are now the norm!
ARCHITECTURE & OPEN SPACES
AT THE HEART OF CREATING A REVITALISED COMMUNITY
Best in class architecture creates a sustainable urban environment

- The existing town centre is more beautiful. New developments sit comfortably alongside historic buildings and heritage sites.
- Good modern architecture that minimises energy consumption and water usage, green spaces and pleasant public areas have replaced ugly, poor quality buildings, semi-derelict areas and surface car parks.
- Pavement cafés and restaurants, great entertainment facilities and a high quality retail experience contribute to a vibrant atmosphere.
- Attractive town centre residential developments have helped create a town that lives.
- Open spaces – squares, parks, boulevards define the successful town or city – often more than buildings. Our open spaces need to be spectacular.
- Together they create an experience without parallel in the region.
Just back in Guildford - amazed to see how well the commercial heart of the town has been developed.

North Street has more shops, a square and interesting streets.

Boutiques on the High Street make it The Town’s Regent Street.

The Debenhams site is now connected to the High Street and has apartments, cafés and a riverside walk.

Corporate headquarters have returned to the town.

The mix of people creates a “buzz” at day and night - fantastic place to live and work!

Submitted by a resident of Guildford
Back in Guildford the other day and pleased that at heart it is just the same place where I loved growing up.

Existing buildings and street layout have been retained.

The new developments are of real architectural merit in sympathy with Guildford’s history and heritage.

Building materials used are sustainable and in keeping with Guildford’s tradition.

I’m glad to see extensive conservation zones preserving the look and feel for future generations.

I would never have thought so much could happen without harming Guildford.

Submitted by a resident of Guildford
When I was back in Guildford the other day, I visited all the Estate Agents and went and looked at houses and flats.

New homes have been developed in the town centre and along the riverside, and they look great - really complementing all the historic buildings and the riverside.

All the services I expect in the town centre such as basket supermarkets and cafes are thriving with the new homes.

The town centre feels safe and yet is lively throughout the waking hours.

There even seem to be plenty of affordable homes in the town centre for key workers and their families.
The Riverside
An Under-Developed Community Jewel
Our Vision in Practice – The Riverside

The regenerated riverside is a new destination in the heart of Our Town

- The riverside is an attractive place to be – no longer blighted by unsympathetic commercial buildings and surface car parks.
- Access to and from the town’s other key heritage sites – High Street and the Castle – is at surface level without crossing busy roads and is a breathing space where people can meet, sit and socialise.
- Its waterside location helps frame the adjacent beautiful countryside and Guildford’s commercial and industrial heritage while wildlife thrives, enabling it to meet the needs of Guildford’s residents and visitors.
- It has become a key destination, hosting a dynamic range of leisure, sport and arts activities, complemented by ample and sympathetic waterfront dining and bars and long riverside footpaths into the countryside.
Spending several days back in Guildford, I loved the riverside.

I went to the annual canal festival celebrating the town’s river and industrial heritage as a break from all the shopping.

I then dined out in some of the fantastic bars and cafes that have replaced the car parks and ugly buildings.

Tomorrow I’m walking the length of the river on great new tracks before visiting the Castle! I hope to spot some of The Town’s resurgent wildlife in the conservation zones that have been established.

I love it so much I may even view a new riverside apartment!
A DYNAMIC GLOBAL HUB
FOR KNOWLEDGE INDUSTRIES CREATING WEALTH AND JOBS
Our Vision in Practice — Our Economy

Guildford is a globally recognised centre for knowledge industries creating wealth and jobs

- Families have continued to move to Guildford from the hurly-burly of London, bringing wealth and skills.
- There is continued inward migration of skills to the South East of England drawn by the proximity to London and its high quality of life.
- Guildford’s economic strength has arisen from it becoming a 21st C international technology centre.
- Guildford has built on existing successes and acquired the critical mass to act as an active commercial hub for niche high-tech industries, supported by an active internationally recognised, world class University.
- The local population benefits from Our Town’s position as a regional retail and leisure destination.
Spent several days back in Guildford on business - Wow - what a dynamic, switched on place to live and work - I may even have to apply for a transfer!

The sleepy old Guildford I remember has become a world centre in 'knowledge' - communications, medical, space tech!

Yes, people do still commute to London, but there's a young, wealthy population too, working at the purpose-built campuses centred on the University.

Great job prospects for graduates and school leavers in old & new businesses!

Plenty of work for professionals serving new industry, in retail and for unskilled workers too.
STRONG SOCIAL INFRASTRUCTURE
THAT CREATES GOOD QUALITY OF LIFE FOR ALL
Our Vision in Practice – Social Infrastructure

Guildford offers a rewarding social environment for all

Our Town offers excellent services catering to the needs of all. Despite an ageing demographic, the growth of high-tech industries has retained a social balance.

Young people move safely around the town, enjoying some of the best sports and leisure facilities in the South East. Great new events celebrate the vibrancy of youth.

Our Town has an extensive arts programme, using new and existing facilities to create a balanced programme that caters to all ages and tastes throughout the year.
Fresh from a week in Guildford - such a great place for young people!

Enjoyed the safe pedestrian and cycle routes around the town.

The Spectrum is still fresh and I loved the cinemas, live music, evening coffee bars and just sitting in the town squares.

Also loved the artificial beach on the Riverside and the cafés there.

Good to see school playing fields being well utilised in evenings and weekends.

Guilfest and the historic St Catherine’s fair were cool too!

Nightlife was fresh and it was fun mingling with the students!

To all young people

Submitted by a resident of Guildford
Guildford is such a great place for the arts.

There’s a sparkling new centre for the arts in an iconic building on the riverside. It has an art gallery, art-house cinema, studio space and a central box office.

I enjoyed a glass of wine listening to live music on the piazza and then went to one of the regular open-air theatre productions.

I followed the sculpture trail and saw the old and new parts of the town, stopping to attend fantastic arts events at the University and Cathedral and the weekly craft market!

I loved the 10-day festival in Shalford Meadows - it was better than Hampton Court!

It’s clear that Guildford has championed the arts, as all venues enjoy capacity audiences.

Submitted by a resident of Guildford
DEFINITIONS

21stC – Twenty first century AD
Council or GBC – Guildford Borough Council
Merrist Wood – The Merrist Wood campus of Guildford College
Our Town is defined as the whole urban area including the University and Research Park to the west
Research Park – Surrey Research Park
Riverside – the banks of the River Wey and the Wey Navigation from Ladymead to St Catherine’s Lock
Royal Surrey – The Royal Surrey County Hospital and its Trust
Slyfield – Slyfield Green Industrial Estate
SSTL – Surrey Satellite Technology Limited
Station – Guildford mainline railway station
University – The University of Surrey
**About Guildford Vision Group**

- This vision document sets out the views of the steering group members of the *Guildford Vision Group* and does not seek to represent the views of any other parties.

- It has been prepared to support the preparation of a local plan for Guildford Borough and a masterplan for Our Town to inform the redevelopment of the North Street Station and other identified sites.

- The *Guildford Vision Group* was formed to campaign for the creation of a new and inspiring vision of the future of Guildford.

- *Guildford Vision Group* has one objective: to see a new process put in place in which the views and creativity of everyone who lives and works in Guildford can play a part in creating a new Vision that looks out 20 or more years into the future. This would be achieved through a framework of engagement supported, managed and informed by the best external facilitators and expert advisors. Ideally such a process would be led by the Borough Council and we very much hope they will take up this challenge, particularly in the light of changes to their planning responsibilities resulting from the new National Planning Policy Framework and recent Localism legislation.

- Further information on *Guildford Vision Group* and its activities can be found at [www.guildfordvisiongroup.com](http://www.guildfordvisiongroup.com)
Transport and connectivity – at the heart of creating a revitalised town
Our Vision in practice - transport

Infrastructure is improved and vehicle traffic no longer dominates

• Re-engineered transport and communication are at the heart of creating a revitalised town.
• Remodelled highways combined with a more sustainable car parking strategy create better options for residents to travel within the town; for visiting motorists; and for those wishing to bypass the town.
• The beautiful town centre is no longer blighted by congestion, there is lower pollution and increased safety for pedestrians.
• Residents and visitors, high tech workers and students enjoy the freedom to easily navigate the town centre.
What might Guildford be like?

There are better connections between the town’s major centres – the Town Centre areas of the historic High Street, Station, riverside and Castle and other key locations - the Cathedral, the University and the Hospital.

• Dedicated, well-maintained walk and cycleways exist and are used with pedestrian areas and new green spaces enhancing these routes.
• Regular subsidised bus service connecting with key points (possibly funded in part by heating allowances donated by more wealthy pensioners).
• A proposal for either a cable car system or driverless tramcars linking all points to Our Town Centre remains on the drawing board and infrastructure has been developed to enable rather than prevent its future construction.

There is raised consciousness about the considerable contribution each of these key locations makes to the physical and spiritual health and vitality of the town.

• The University’s internationally-acclaimed Research Park is instinctively recognised as a major driver of the town’s economy.
• the Borough Council Executive includes a councillor post with a specific brief covering the Park’s activities.
• Because of their distance from the town centre, all three locations have recognised the need to attract on-going interest from residents in all parts of the town. Key figures from all three locations feature regularly on local radio. Additionally these locations reach out in a variety of other ways:
What might Guildford be like?

The Cathedral plays host to a wide range of community events and attractive exhibitions (nonetheless inevitably reminding participants of its central role in the spiritual life of the town).

- The acclaimed Wintershall Easter re-enactment follows the broad path from the town to the Cathedral on the hill.
- The Mayor’s annual fireworks procession also takes the same route, and at Christmas there is a spectacular Christmas market along the route, with seasonal food and gift stalls.
- The broad path to the Cathedral also has ‘stations’ along its length that tell the history of Guildford in an engaging manner – it is considerable attraction for visitors.

The University has sponsored and encouraged a student quarter in the North Street development.

- This area has outlets and an ambience that act as a magnet for students, thereby bringing gown more obviously into town.
- It is connected to the town by a tree-lined boulevard and directly to the new relief road.
- Students at the School of Acting perform at dedicated busking points.
- Residents are now left in no doubt that Guildford is a university town.
What might Guildford be like?

The Research Park has a brilliant visitor centre.
- Residents and others get a great impression of the range and scale of its cutting-edge activities.
- Regular educational visits and displays allow students of all ages to get a hands-on taste of the exciting work that goes on at the Park.
- Future generations of students and workers are inspired to continue making Guildford a centre of excellence that creates value-adding employment.

The Hospital has a town centre minor A&E unit, again in the North Street development.
- Less serious ailments, cuts and bruises are dealt with locally.
- Consultations also take place via video link to the main hospital.
- Dedicated transport takes patients to the hospital if more specific attention is required.
What might Guildford be like?

Vehicles & Traffic

- Traffic congestion removed from the Town. The gyratory is replaced by new bridges and roads put in tunnels.
- Through traffic diverted away from the Town by a bypass.
- Links improved for local traffic and public transport between Town Centre and the County Hospital, University, Research Park, Sports Park, Railway Station.
- Bridge Street, Onslow Street humanised.
- Two new Park & Ride facilities installed north of the Town.
- Surface car parks replaced by parking underground and within new structures.
- Low noise tarmac applied on main roads through and close to residential areas.
- All sizeable residential establishments host car clubs.
- Plentiful electric charging points are in regular use.

Pedestrians

- Guildford is now a safe, attractive town for pedestrians to enjoy, free from vehicle dominance.
- There is an attractive, welcoming walking route from railway station to the Town Centre and other key locations.
- Street clutter has been removed.
- There are safe and enjoyable cycling and walking routes from the Town Centre to the University, County Hospital and the Cathedral.
- Visitors can easily find their way around the Town Centre.
- There are many places to cross the railway and river which link up with the riverside.
- There are ample crossing points complemented where necessary by wide, well lit, welcoming subways below the busiest roads.
## What might Guildford be like?

### Cycles
- Cyclists are encouraged in the Town by well designed and safe separate routes to all major destinations.
- Traffic space allocated to cyclists to provide either traffic free or dedicated routes.
- More than 15% of Guildford journeys are made by bicycle.
- Busy routes lit after dark.
- Covered, secure cycle parking provided at all major travel locations.
- Subways and ramps not required for pedestrians adapted for cyclists.

### Buses
- Attractive and functional interchange with comprehensive waiting facilities placed close to the main shopping area.
- Several bus stops within the Town Centre.
- Regular bus services at the main railway station.
- Long distance coaches, now call at the railway station.
- Peak time bus services provided from Park & Ride sites direct to main centres of employment like Slyfield and County Hospital.
What might Guildford be like?

Rail

• Local rail services link Chilworth with new stations at Park Barn and Merrow.
• Guildford station re-designed with public footway and improved facilities for disabled passengers.
• Bus and coach interchange facilities provided.
• Much of the need for car parking at Guildford main station reduced by the creation of Milford Parkway.
• Improved connectivity with Heathrow through a direct rail link via Woking.
Architecture and open spaces – at the heart of creating a revitalised community
Our Vision in practice - architecture

Best in class architecture creates a sustainable urban environment

- The existing town centre is made more beautiful.
- Good modern architecture, green spaces and pleasant public areas replace ugly, poor quality buildings, semi-derelict areas and surface car parks.
- Pavement cafés and restaurants, great entertainment facilities and a high quality retail experience sit comfortably alongside historic buildings and heritage sites.
- Attractive town centre residential developments help create a town that lives.
- Open spaces – squares, parks, boulevards define the successful town or city – often more than buildings. Our open spaces need to be spectacular.
- Together they create an experience without parallel in the region.
What might Guildford be like?

Our Town's character and amenities have been conserved and enhanced.

- Its character remains defined by its situation on the River Wey and the hilly landscape of the North Downs.
- New buildings make use of local construction materials to blend with the existing building stock while also using more modern materials that conserve energy and water.
- Much of the town centre and certain surrounding areas have been designated as conservation areas or areas of "special architectural or historic interest", the character or appearance of which it is desirable to retain.
- Existing heritage buildings, street and building plot layout, important open spaces, trees and views are preserved.
- Where development has taken place, it has been with due regard to the height and character of Our Town's ancient streets, historic buildings and ancient monuments.
- Best-in-class, modern architecture has not been discouraged and provides new heritage sites of the future. Such buildings have been included in the list of areas being conserved.
- Use is made of roof tops and other surface areas for agriculture and power generation through solar arrays.
- Adjacent parts of the town respect its character and scale, preserving and enhancing the town's overall character and links with its natural heritage.
What might Guildford be like?

Our Town’s housing stock has been developed to meet the needs of all residents

• Development of infrastructure, amenities and major commercial facilities will lead to pressure on house prices and an even larger shortfall than currently exists.

• In the 'dream' scenario, there is plenty of sustainable housing across the Borough and especially in the town centre to provide accommodation for all levels of workers and for all age groups.

• The presence of a critical mass of residents in the town centre ensures that the town is lively and safe throughout the waking hours.

• Café culture has really taken off and the choice of basket supermarkets ensures that everyone enjoys living in the town centre - even though housing developments right in the centre are quite dense at around 120 to 160 dwellings per hectare.

• The apartments overlooking the new riverside walk and public spaces are in great demand and are built in County Town vernacular, creating tomorrow's heritage sitting comfortably alongside the heritage of Guildford.
What might Guildford be like?

Our Town has a strengthened retail and commercial offering

Overview

• Our Town has exploited the major opportunity presented by the presence of a world class university and one of only three university-owned research parks in the country.

• It has successfully managed the substantial threat posed by the lack of available housing that skilled and support workers can afford that persisted in 2013 and civic amenities that lag behind the competing centres including Cambridge and Oxford.

Retail

• The 'dream' scenario has been realised. A major expansion of the retail offering has been completed, enabled by and part funding major infrastructure improvements to traffic and travel to, from and past the town centre. This has brought John Lewis and other major retailers to the town.

• Because of the introduction of new retail space, the Debenham store has been converted into residential and leisure space, opening up the High Street to the river for the first time in 100 years. There is a new town square with a maypole and performing arts.
What might Guildford be like?

- The High Street has become Guildford’s Bond Street or Regent Street with boutique shops and restaurants complementing its heritage status and the offers of multiple retailers in the completed and award winning North Street development.

**Commercial**

- Headquarters offices, once attracted to Guildford but which migrated away when full employment, a lack of affordable housing for key workers and unbearable traffic congestion, have started to return.
- The research park has expanded and is home to some of the world's leading high technology companies.

- Although many people still commute from Guildford to London, this has been re-balanced and the town is now vibrant at all times.
- Tourists, residents of all ages, students and employees create a buzz that makes Our Town the most desirable place in the South East region to live and work.
The riverside – an under-developed community jewel
Our Vision in practice – the riverside

A regenerated riverside becomes a new destination in the heart of the town

• The riverside is no longer blighted by unsympathetic commercial buildings and surface car parks.
• It enjoys surface access to the town’s other heritage sites – High Street and the castle - and becomes a breathing space where people can meet, sit and socialise.
• It is a waterside location which celebrates the adjacent beautiful countryside and Guildford’s industrial heritage blended with the needs of its 21st Century inhabitants.
• It is a key destination which hosts a vibrant range of leisure, sport and arts activities, complemented by ample and sympathetic waterfront dining and bars.
What might Guildford be like?

Overview

• The river from Ferry Lane to Stoke Mill continues to be a key amenity for Our Town that is a vital part of its geographical context in the heart of the Surrey Hills AONB. It provides a tranquil corridor and haven for nature through its heart, while the water meadows and other green spaces upstream perform a vital role in protecting the town’s centre from seasonal flood waters.

• The immediate riverside area also forms a vital part of Our Town’s industrial heritage, including the River Wey Navigation, Dapdune Wharf, and Old Town Crane. The riverside area is owned by the National Trust with adjacent areas including the Rodboro Buildings, Warehouses and Town Mill in hands of GBC and private owners.

• Despite this outstanding legacy, generations of historical failings in stewardship have left Guildford with a legacy of inappropriate development including surface car parks and the Debenhams department store that blights this amenity.

• Other locations, for example Birmingham, have used their waterside context as a catalyst for regeneration, conservation and economic growth. With Guildford’s centre soon to embark on major redevelopment, the opportunity is taken to ensure that a proper plan is in place to reinstate Our Town's riverside area achieved through sympathetic re-development with an amenity of value to all residents.
What might Guildford be like?

• Consequently establishing a clear plan for the riverside area together with the National Trust is vital.

Ferry Lane to Town Mill
• This area of predominantly green space has been retained. Only with minor exceptions has there been further development on the riverside or adjacent areas. Any development that has taken place has been restricted to existing developed plots and preserved the character of existing sites, uses, plot ratios and building heights.
• The use as water meadow has been retained to preserve this vital function as well as conserving views of the local landscape. This has enable local wildlife including birds, dish and otters to flourish while providing an attractive amenity for walkers, cyclists and rowers.

Town Mill to Dapdune Wharf
• This is existing urban area used to comprise an ill-fitting blend of historical and contemporary buildings. It was poorly connected to the rest of the town centre, difficult to navigate as a consequence of arterial routes and lacked homogeneity due to the presence of monolithic developments including Debenhams and Wey House.
• Given its town centre location and history, the area was ideally suited for conversion to leisure and retail use.
• A new leisure destination has been created based around continental style café-culture. This includes the creation of a wide range of drinking, dining and retail options attractive across a wide demographic.
What might Guildford be like?

- Open areas such as piazzas are also an important feature and enable performing arts to thrive, linking with the adjacent Yvonne Arnaud and Electric theatres. There is also a major annual canal festival and sporting events based on the riverside area that bring visitors to Our Town.
- Communication with key visitor destinations including High Street, the redeveloped north Street, the Castle and transport hubs have been improved ensuring this area is well linked with the other key areas of Our Town.
- This required extensive development but had a major positive impact on Our Town.
- This included sensitive re-development of existing historical buildings such as Rodboro Building, aiding its conservation.
- New development was sited principally at two sites: the Millbrook and Riverside Market surface car parks. This has improved their economic productivity as well as improving site lines in the direction of The Mount and Quarry Street.
- Finally, a long term objective of removing inappropriate major structures such as the BT Building, Debenhams, and Friary Court has been met as a consequence of plans being developed for this area that facilitated rather than prevented such development which have further contributed to the economic growth and use of this area of Guildford’s riverside.
What might Guildford be like?

Dapdune Wharf to Stoke Mill

• This area comprises a combination of residential, retail and industrial space and can be considered to include the area of Walnut Tree close to the west.

• The existing retail and industrial space mars this area of the river and should be relocated where possible to out of town sites such as Slyfield which are better suited to meet their needs.

• The resultant space created can be better used to meet the Town’s residential needs by creating new communities that are well sited close to communication hubs and hence meet the needs of Our Town’s economic aspirations.

Navigation

• Our Town’s riverside area forms a north-south corridor used extensively by walkers, cyclists, rowers and canoeists. It intersects with the Pilgrims Way at its southerly end and the town centre’s major communications arteries.

• As an existing leisure site, future development should be balanced with the need to preserve good quality routes and access while enabling improvements to be made to vehicular traffic, the latter being one of the major challenges for Our Town.

• Opportunity exists to improve the quality of footpaths through improved signposting and information, wider verges and reduced railings.
A vibrant global hub for high-tech industry creating wealth and jobs
Our Vision in practice – economy

Guilford is a globally recognised centre for high-tech industries that create wealth and jobs

• The South East and London continue to benefit from net inward migration
• London is a global hub that increasingly controls its own revenue and spend
• Developed economies such as the UK remain dependent on knowledge and technology based businesses to compete globally
• There is an ageing demographic

Families continue to move to Guildford from the hurly-burly of London, bringing wealth and skills. This is supplemented by continued inward migration to the South East of England drawn by the proximity to London and its high quality of life. As a consequence Our Town grows.

Guildford’s economic strength arises from becoming a 21st C small scale analogue of Silicon Valley. It has built on existing successes and acquired the critical mass to act as a vibrant commercial hub for niche high-tech industries, supported by an active and internationally recognised University. Our Town also services the local population from its position as a regional retail and leisure destination.
What might Guildford be like?

Overview

• Families continue to move to Guildford from the hurly-burly of London, bringing wealth and skills. This is supplemented by continued inward migration of skills to the South East of England drawn by the proximity to London and its high quality of life. As a consequence Our Town grows.

• Guildford’s economic strength arises from becoming a 21st C small scale analogue of Silicon Valley. It has built on existing successes and acquired the critical mass to act as a vibrant commercial hub for niche high-tech industries, supported by an active and internationally recognised University. Our Town also services the local population from its position as a regional retail and leisure destination.

Business and employment thrive

• The University has gone from the strength to strength and is now one of the top ten universities in the country with one in four school leavers aspiring to study there.

• Our Town has an economic strategy focussed on creating employment opportunities in businesses that are either sustainable sources of long term employment or in growth sectors that create new employment. While many residents still commute daily to London, there are thriving and rewarding employment opportunities in Our Town too.
What might Guildford be like?

- Guildford is recognised as a hub for skilled, technology-based industries and their supply chain, hosting several of the government’s “Catapult Centres”. It benefits from more joined up economic development and commercialisation of University developed intellectual property.
- It has sufficient critical mass to compete effectively with other major centres in Cambridge, Harwell and the US.
- It is recognised as one of the world’s centres of excellence in space technology and data, built on the work of SSTL. This allows existing businesses to grow and brings new businesses to Our Town...
- It is recognised as one of the world’s centres of excellence in digital communications having built on existing 5G expertise. Major communications firms such as Avaya remain and grow in Guildford and are joined by other businesses seeking to develop and exploit new technology as spin-offs from research at the University.
- The growth of medicine at the University and the Royal Surrey’s status as a regional medical centre create spin-off opportunities in assisted medicine, medical instrumentation, niche pharmaceuticals and biotech.
- Our Town is a regional centre for the computer games industry with major developers and niche designers and technology companies based here.
What might Guildford be like?

- Other internationally recognised centres of excellence have emerged in areas including Big Data, ultra-clean manufacturing and digital connectivity.
- There is an annual science and technology fair that demonstrates Our Town’s capabilities and promotes career opportunities.
- There is an emerging creative industry that serves local business as well as competing against the established community in London. It draws on the strong artistic heritage of Our Town and provides employment opportunities in music, theatre, the web, or marketing.
- There is a continuing and thriving professional services business community (venture capital/investment banking, legal, accounting), supporting local and regional businesses and providing specialist support for Our Town’s high-tech industries. It provides a cost effective alternative to London-based firms and enables able students from the College of Law and University to remain in Our Town.
- There is a trade body representing these growth industries in Our Town which is actively engaged with the Council and residents in its future development.
- An expanded Slyfield provides employment opportunities for the skilled trades necessary to support Our Town’s population, supported by training at Guildford College.
What might Guildford be like?

• The regenerated town centre and riverside areas create new employment opportunities in retail and catering that meet the needs of all ages. An increased focus on exploiting Our Town’s heritage, making a more attractive tourist destination and expanded leisure offerings provide new employment.

• Small industrial units are built allowing an artisan population to flourish, made sustainable by courses offered at Merrist Wood and the wealth of the town’s hinterland. These small businesses are supported by an annual rural crafts fair as Guildford exploits its position at the heart of the Surrey Hills.

• Provision is made for social enterprises.

• With an ageing, wealthy population, provision is made proactively for expanded social care.

Enabled by supporting infrastructure

• The Local Plan and Masterplan for the town centre include appropriate provision for premises for all of these industries, based on an ethos of planning to enable success.

• Our Town has a strategy of supporting high-tech businesses through a global ambassador programme that encourages inward investment. There is effective lobbying of central government and venture capitalists that yields a constant stream of seed capital.
What might Guildford be like?

• Space is allocated in Our Town to niche industries so that they maintain critical mass and create a thriving self-sustaining pool of talent. The Research Park is expanded and new, specialist campuses to accommodate these businesses built at strategic locations. It boasts almost ten per cent of patent applications for high value-added products in the country.

• Modern office space is built for professional services and creative industries.

• Slyfield is expanded.

• All business premises enjoy excellent communications links, including the rail and road networks, airport connections and electronic communications to enable their competitiveness.

• There is a broad mix of space built in all new developments that is capable of accommodating new technology but also capable of conversion for alternative uses as technological change and shifting demographics impact the demand for and the nature of formal workplaces.

• Schools in Our Town wishing to specialise do so in areas linked to its growth industries, building strong partnerships with leading local businesses to create a self-sustaining pool of future talent and securing jobs for school leavers and university graduates.
What might Guildford be like?

• There is an appropriate mix of housing that preserves existing values while making provision for affordable homes in all areas of the town that match the needs of workers. It prevents the creation of ghettos of lower paid people and avoids the creation of isolated gated communities for the better off.

• Our Town’s heritage is preserved and the worst of more recent development demolished to make way for new facilities with more sensitive and flexible architecture.
Strong social infrastructure that creates good quality of life for all
Our Vision in practice – social infrastructure

Guildford offers a rewarding social environment for all

Our Town offers excellent services that caters to the needs of all ages. Despite an ageing demographic, the growth of high-tech industries has retained a social balance.

Young people move safely around the town, enjoying some of the best sports and leisure facilities in the South East. There are events that cater to their needs while celebrating the vibrancy of youth with new festivals and fairs throughout the year.

[Arts]
Supporting Our Town’s youth

Overview
The youth of Guildford is generally well served with facilities. The quality and range of these services are retained into the future. However there is always scope for improvement and opportunities exist to create better infrastructure, activities and facilities that provide an attractive offer to Our Town’s younger residents.

Continued development of Our Town’s leisure facilities
• The Spectrum site is developed so that it continues to offer facilities that meet the needs of Our Town’s young people. It is home to most of Our Town’s amateur and professional sports clubs. The site is regularly refurbished so that it continues to rank among the top five leisure centres in the South East of England.
• There is an artificial beach on the Riverside from which children are able to swim in the safe waters of the canal.
• There is an annual open water swimming race on the River Wey through Guildford.
• There are retail offerings within the centre of Our Town, providing options for young people to socialise in a safe and attractive environment.
Supporting Our Town’s youth

• There is increased access to sporting facilities at Our Town’s schools and in particular access to those of the many private schools, that have been negotiated as part of planning consents.

• The historic St Catherine's fair is reinstated, celebrating youth culture in the town and raising money for charity. The adjacent College of Law site provides expansion space as the event grows.

• The Guilfest festival and its successors continue, meeting the needs of the youth of the town.

Safe navigation around Our Town

• Young people navigate Our Town freely and safely.

• Well lit cycle routes exist along all major highways, between all schools, the University, key housing areas and leisure sites, providing safe navigation by bike, scooter, roller blade and skateboard. There are parking facilities in the Town Centre for this equipment.

• Underpasses have been removed and replaced by surface crossings as part of the improvement to Our Town’s roads and Riverside.
Supporting Our Town’s youth

University students socialise within Our Town adding to its cultural depth

• Bars and clubs exist dispersed throughout Our Town. They are located away from residential areas and there are no “no-go” areas at night.

• The range of offers attracts local students, residents and visitors who mix freely and without tension at night
A vibrant, regional centre for the Arts

A centre for culture vultures from across the UK and beyond
• Our Town is furnished with extensive arts venues that are easily accessed from its improved transport links and there is a central box office for all events.
• The GLive venue has flourished and is one of the South East’s leading venues for performing arts. The Yvonne Arnaud Theatre is again a commissioning venue and hosts leading touring productions.
• The University also hosts regular performing arts events and has built on the success of the Guildford School of Acting. The Academy of Contemporary Music has relocated to the University enabling it to cater to all musical tastes.
• There is a new Arts Centre piazza built on the riverside as part of its regeneration.

• There are regular art-house cinema shows at a purpose-built venue.
• The Woolsack Art Gallery has opened in one of Our Town’s heritage venues
• Guildford benefits from street art and a sculpture trail linking its arts venues. Together with its emphasis on green spaces, this provides a considerably enhanced public realm.
• The cobbled High Street is once again a market area, hosting a lively and diverse market including weekly craft and farmers markets.
• Our Town’s heritage sites such as the Castle Grounds regularly host outdoor theatre.
• Our Town’s arts heritage is celebrated at the annual Book Festival and the ten-day Guildford Festival held in Shalford Park attended by leading names in the arts.
APPENDIX 8 – ANALYSIS OF APPENDIX D
<table>
<thead>
<tr>
<th>Site</th>
<th>Description</th>
<th>Ward</th>
<th>Area (Ha)</th>
<th>Current Uses</th>
<th>Surrounding Uses</th>
<th>Proposed Uses</th>
<th>Ownership</th>
<th>Rating for Housing</th>
<th>Area (Ha) rated 'GOOD' for housing</th>
<th>GOOD Area x 40 dph</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>North Street regeneration site</td>
<td>Friary St. Nicolas</td>
<td>2.52</td>
<td>Surface car park (short stay), multi-storey car park, bar, housing, shops, bank, offices, Citizen’s Advice Bureau</td>
<td>Shops and other services</td>
<td>Reinforcement and extension of the main shopping area - retail-led mixed-use development</td>
<td>Guildford Borough Council and private landowner</td>
<td>GOOD</td>
<td>2.52</td>
<td>100</td>
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<tr>
<td>2</td>
<td>Portsmouth Road surface car park</td>
<td>Friary St. Nicolas</td>
<td>0.33</td>
<td>Surface car park (88 contract spaces during weekdays, short stay spaces at weekends)</td>
<td>Restaurants, pubs, church and shops</td>
<td>mixed-use development, potentially accommodating riverside cafes/restaurants at ground floor with leisure (potentially a gym), hotel, residential, community uses or offices above</td>
<td>Guildford Borough Council and Surrey County Council</td>
<td>POOR</td>
<td>0.00</td>
<td>0</td>
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<tr>
<td>3</td>
<td>1 and 2 Station View</td>
<td>Friary St. Nicolas</td>
<td>0.68</td>
<td>Offices and ancillary car parking</td>
<td>Car parking, railway line, offices and commercial uses</td>
<td>offices, housing, or mix of these</td>
<td>Private</td>
<td>GOOD</td>
<td>0.68</td>
<td>27</td>
</tr>
<tr>
<td>4</td>
<td>The Plaza, Portsmouth Road</td>
<td>Friary St. Nicolas</td>
<td>0.38</td>
<td>Vacant, cleared site (was last occupied by office buildings)</td>
<td>Commercial and office uses, pub and residential</td>
<td>offices and/or housing</td>
<td>Private</td>
<td>GOOD</td>
<td>0.38</td>
<td>15</td>
</tr>
<tr>
<td>5</td>
<td>Land and buildings at Guildford railway station</td>
<td>Friary St. Nicolas</td>
<td>3.60</td>
<td>Railway station, transport infrastructure, surface car park (including long stay/commuter parking and parking for adjacent Ranger House), taxi rank, small scale retail and cafes</td>
<td>Residential, car parking, offices, residential, retail</td>
<td>A mixed use development in this very sustainable location Housing (including affordable housing), offices, small and medium scale shops, food and drink, leisure, community uses and hotel</td>
<td>The site is owned by Solum Regeneration, a partnership between Network Rail and Kier Property.</td>
<td>GOOD</td>
<td>3.60</td>
<td>144</td>
</tr>
<tr>
<td>6</td>
<td>Bedford Road surface car park</td>
<td>Friary St. Nicolas</td>
<td>0.48</td>
<td>Public surface car park (68 short stay spaces and 35 contract spaces), 20 lock up garages, and auctioneer’s building</td>
<td>Cinema, offices, retail, residential and river</td>
<td>housing (on upper floors only due to flooding), offices, or mix of these with small scale food and drink, retail, leisure and/or community use</td>
<td>Guildford Borough Council</td>
<td>GOOD</td>
<td>0.48</td>
<td>19</td>
</tr>
<tr>
<td>7</td>
<td>Bright Hill car park</td>
<td>Holy Trinity</td>
<td>0.47</td>
<td>Public surface car park (short stay) - 121 spaces</td>
<td>- Residential, retail, education, pub, vacant commercial premises</td>
<td>housing or offices</td>
<td>Guildford Borough Council</td>
<td>GOOD</td>
<td>0.47</td>
<td>18</td>
</tr>
<tr>
<td>8</td>
<td>Guildford park car park</td>
<td>Onslow</td>
<td>1.97</td>
<td>Surface car park (400 long stay spaces) and garages (118)</td>
<td>Residential, railway tracks and student accommodation</td>
<td>New homes and/or offices and/or parking offices, housing, or mix of these with small scale food and drink, leisure and/or community use</td>
<td>Guildford Borough Council</td>
<td>GOOD</td>
<td>1.97</td>
<td>78</td>
</tr>
<tr>
<td>9</td>
<td>Buildings at Chertsey Street, Guildford</td>
<td>Holy Trinity</td>
<td>1.00</td>
<td>Offices</td>
<td>Offices, bars, school, residential</td>
<td></td>
<td>Private</td>
<td>GOOD</td>
<td>1.00</td>
<td>40</td>
</tr>
<tr>
<td>10</td>
<td>Jewsons, Walnut Tree Close</td>
<td>Friary St. Nicolas</td>
<td>0.73</td>
<td>Sui generis</td>
<td>Offices, railway lines, residential and industrial</td>
<td></td>
<td>Private</td>
<td>GOOD</td>
<td>0.73</td>
<td>29</td>
</tr>
</tbody>
</table>
## APPENDIX D of the Guildford Borough Council Issues & Options Consultation, Oct/Nov 2013 (SITES 1-34)

<table>
<thead>
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<th>Area (Ha) rated 'GOOD' for housing</th>
<th>GOOD Area x 40 dph</th>
</tr>
</thead>
<tbody>
<tr>
<td>11</td>
<td>Midleton Industrial Estate (excluding Lexicon House)</td>
<td>Onslow</td>
<td>1.97</td>
<td>Industrial estate - a mixture of B1a office buildings, B1c light industry and B2 general industrial employment land</td>
<td>Railway and Guildford Business Park</td>
<td>Employment use (B class)</td>
<td>Guildford Borough Council</td>
<td>POOR</td>
<td>0.00</td>
<td>0</td>
</tr>
<tr>
<td>12</td>
<td>Cathedral Hill Industrial Estate, G1, G2 and G3 and Guildford Industrial Estate</td>
<td>Onslow</td>
<td>7.60</td>
<td>Industrial estate</td>
<td>A3 to the north, railway to the south, residential to west and Guildford Businesses Park to the east</td>
<td>potential for intensification of the site in the plan period for B2/B8 or even B1a use if adequate parking were provided</td>
<td>Private</td>
<td>POOR</td>
<td>0.00</td>
<td>0</td>
</tr>
<tr>
<td>13</td>
<td>Land at Guildford Cathedral</td>
<td>Onslow</td>
<td>3.28</td>
<td>Open space</td>
<td>Cathedral, open space, residential, university</td>
<td>New homes</td>
<td>Dean and Chapter of Guildford Cathedral</td>
<td>GOOD</td>
<td>3.28</td>
<td>131</td>
</tr>
<tr>
<td>14</td>
<td>Land at Walnut Tree Close (including Wey Corner)</td>
<td>Friary St. Nicolas</td>
<td>4.50</td>
<td>Commercial, warehousing, parking</td>
<td>Industrial, commercial, residential and the river</td>
<td>Housing (with some affordable housing) and modern offices (B1a use class)</td>
<td>Private</td>
<td>GOOD</td>
<td>4.50</td>
<td>180</td>
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<tr>
<td>15</td>
<td>Merrow Depot, Merrow Lane</td>
<td>Merow</td>
<td>4.51</td>
<td>Employment uses (depot, warehousing, repairs, offices, and associated car parking)</td>
<td>Residential, railway line and countryside</td>
<td>Housing or B1c, B2 and B8 use</td>
<td>Surrey County Council</td>
<td>GOOD</td>
<td>4.51</td>
<td>180</td>
</tr>
<tr>
<td>16</td>
<td>Guildford Fire Station, Ladymead</td>
<td>Friary St. Nicolas</td>
<td>0.76</td>
<td>Fire station and associated buildings and parking</td>
<td>Residential, church, lido, offices</td>
<td>A new fire station, affordable housing and new homes or a care home</td>
<td>Surrey County Council</td>
<td>GOOD</td>
<td>0.76</td>
<td>30</td>
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<tr>
<td>17</td>
<td>Former Pond Meadow School</td>
<td>Westborough</td>
<td>0.60</td>
<td>Vacant school buildings</td>
<td>Residential, school, school playing fields</td>
<td>New homes and affordable housing or a care home, or student accommodation or a community use</td>
<td>Surrey County Council</td>
<td>GOOD</td>
<td>0.60</td>
<td>24</td>
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<tr>
<td>18</td>
<td>Guildford College, Stoke Road</td>
<td>Christchurch</td>
<td>4.80</td>
<td>Education buildings and associated uses, open space</td>
<td>Residential, lido, commercial, open space and leisure</td>
<td>Education facilities and associated uses</td>
<td>Guildford College</td>
<td>FAIR</td>
<td>0.00</td>
<td>0</td>
</tr>
<tr>
<td>19</td>
<td>Slyfield Area Regeneration Project (SARP)</td>
<td>Stoke</td>
<td>40.00</td>
<td>Slyfield industrial estate, sewage treatment facility and the Council depot</td>
<td>Slyfield industrial estate, residential, the A3 and undeveloped land</td>
<td>New homes, employment premises, a new council waste management depot (relocated on the site), waste facilities and a new sewage treatment works (relocated on the site)</td>
<td>Surrey County Council, Thames Water and Guildford Borough Council</td>
<td>GOOD</td>
<td>40.00</td>
<td>1600</td>
</tr>
<tr>
<td>20</td>
<td>Lysons Avenue/Station Road East/West</td>
<td>Ash Vale</td>
<td>9.80</td>
<td>Industrial Estate</td>
<td>Recreation ground to north, railway line to the west, residential south and east</td>
<td>some scope for intensification and redevelopment of older buildings</td>
<td>Private/ Guildford Borough Council</td>
<td>POOR</td>
<td>0.00</td>
<td>0</td>
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<tr>
<td>21</td>
<td>Enterprise Industrial Estate, Station Road West</td>
<td>Ash Vale</td>
<td>0.30</td>
<td>Industrial estate - business start up units</td>
<td>Sits within Lysons Avenue/Station Road East/West Industrial Estates</td>
<td>Employment - B classes.</td>
<td>Guildford Borough Council</td>
<td>POOR</td>
<td>0.00</td>
<td>0</td>
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<tr>
<td>22</td>
<td>Ramada Hotel, Guildford Road, East Horsley</td>
<td>Clandon &amp; Horsley</td>
<td>1.30</td>
<td>Hotel</td>
<td>Petrol station, residential, fields</td>
<td>New homes or a care home/ retirement housing</td>
<td>Private</td>
<td>GOOD</td>
<td>1.30</td>
<td>52</td>
</tr>
<tr>
<td>Site</td>
<td>Description</td>
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<td>Current Uses</td>
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</tr>
<tr>
<td>23</td>
<td>Mount Browne (Surrey Police Head Quarters), Sandy Lane</td>
<td>Shalford</td>
<td>21.39</td>
<td>Employment uses (Surrey Police Head quarters) and associated uses</td>
<td>Residential, Guildford College of Law, fields</td>
<td>Housing (including some affordable housing), retirement homes and or student accommodation</td>
<td>Surrey Police</td>
<td>GOOD</td>
<td>21.39</td>
<td>855</td>
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<tr>
<td>24</td>
<td>Land around Merrist Wood college</td>
<td>Worplesdon</td>
<td>164.00</td>
<td>Educational uses and land surrounding</td>
<td>Fields and residential</td>
<td>Uses supporting the current educational use, which may be able to demonstrate very special circumstances for additional development in the Green Belt</td>
<td>Guildford College</td>
<td>POOR</td>
<td>0.00</td>
<td>0</td>
</tr>
<tr>
<td>25</td>
<td>RHS Wisley, Wisley</td>
<td>Lovelace</td>
<td>114.00</td>
<td>Wisley gardens (visitor attraction, learning and research facility)</td>
<td>Golf course, the A3, former Wisley airfield, farms</td>
<td>Additional development to support the future vitality and viability of the current use which can demonstrate very special circumstances for additional development in the Green Belt</td>
<td>Royal Horticultural Society</td>
<td>POOR</td>
<td>0.00</td>
<td>0</td>
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<tr>
<td>26</td>
<td>Bisley Camp, Bisley, Brookwood (shooting ground)</td>
<td>Pirbright</td>
<td>79.00</td>
<td>Sport and recreation, business premises, workshops</td>
<td>Pirbright camp, fields</td>
<td>Additional development to support the future vitality and viability of the current use which can demonstrate very special circumstances for additional development in the Green Belt</td>
<td>National Rifle Association and other landowners</td>
<td>POOR</td>
<td>0.00</td>
<td>0</td>
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<tr>
<td>27</td>
<td>Grange Road, Tongham (bounded by A331/A31)</td>
<td>Ash South &amp; Tongham</td>
<td>18.56</td>
<td>Arable farmland and paddocks</td>
<td>A roads, residential, fields and commercial</td>
<td>A residential led or mixed use (residential and employment) scheme, possibly including retirement/care housing, retail, food and drink, leisure and community uses</td>
<td>Private</td>
<td>GOOD</td>
<td>18.56</td>
<td>742</td>
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<tr>
<td>28</td>
<td>Land at Kingston House, Poyle Road, Tongham</td>
<td>Ash South &amp; Tongham</td>
<td>3.55</td>
<td>Fields</td>
<td>Fields and Residential</td>
<td>Residential with some affordable housing</td>
<td>Private</td>
<td>GOOD</td>
<td>3.55</td>
<td>142</td>
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<tr>
<td>29</td>
<td>Land to the east of White Lane, Ash Green</td>
<td>Ash South &amp; Tongham</td>
<td>1.90</td>
<td>Pasture land</td>
<td>Residential, fields</td>
<td>Residential with some affordable housing</td>
<td>Private</td>
<td>GOOD</td>
<td>1.90</td>
<td>76</td>
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<tr>
<td>30</td>
<td>Land to the south of Hazel Road, Ash Green</td>
<td>Ash South &amp; Tongham</td>
<td>2.87</td>
<td>Pasture land</td>
<td>Residential and fields</td>
<td>Residential with some affordable housing</td>
<td>Private</td>
<td>GOOD</td>
<td>2.87</td>
<td>114</td>
</tr>
<tr>
<td>31</td>
<td>Land south of Ash Lodge Drive, Tongham</td>
<td>Ash South &amp; Tongham</td>
<td>42.00</td>
<td>Pastoral farmland</td>
<td>Residential, school and fields</td>
<td>Residential with some affordable housing</td>
<td>Private</td>
<td>GOOD</td>
<td>42.00</td>
<td>1680</td>
</tr>
<tr>
<td>32</td>
<td>Land near The Briars, South Lane and Grange Road</td>
<td>Ash South &amp; Tongham</td>
<td>11.20</td>
<td>Urban fringe informal recreational purposes to the east, with paddocks located to the west of the land parcel</td>
<td>Residential and fields</td>
<td>Residential with some affordable housing</td>
<td>Private</td>
<td>GOOD</td>
<td>11.20</td>
<td>448</td>
</tr>
<tr>
<td>Site</td>
<td>Description</td>
<td>Ward</td>
<td>Area (Ha)</td>
<td>Current Uses</td>
<td>Surrounding Uses</td>
<td>Proposed Uses</td>
<td>Ownership</td>
<td>Rating for Housing</td>
<td>Area (Ha)</td>
<td>GOOD Area x 40 dph</td>
</tr>
<tr>
<td>------</td>
<td>--------------------------------------------------</td>
<td>---------------------------</td>
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</tr>
<tr>
<td>33</td>
<td>Land to the south and east of Guildford Road</td>
<td>Ash Wharf and Ash South &amp; Tongham</td>
<td>13.15</td>
<td>North of the railway line - paddocks and pasture with some residential development</td>
<td>Residential, commercial, shops, railway station</td>
<td>A residentially led mixed use scheme, possibly including retirement/care housing, student accommodation, employment uses, retail, food and drink, leisure and community uses</td>
<td>Private</td>
<td>GOOD</td>
<td>13.15</td>
<td>526</td>
</tr>
<tr>
<td>34</td>
<td>Land to the north west of Ash Green Road</td>
<td>Ash South &amp; Tongham</td>
<td>2.91</td>
<td>Grassed field</td>
<td>Residential and fields</td>
<td>Residential with some affordable housing</td>
<td>Private</td>
<td>GOOD</td>
<td>2.91</td>
<td>116</td>
</tr>
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Sustainable growth respects the constraints imposed by the local environment.

As an example of local variation, in Guildford, sustainable upward or outward expansion is limited by the geography of a gap town. The Surrey Hills Area of Outstanding Natural Beauty rises to east and west and requires the highest level of landscape protection. The flood plain of the River Wey runs through the town and extends to the north and south. Significant parts of the town lie within the 5km protection zone of the Surrey Heaths Special Protection Area, a European habitat to the NW that we are obliged to safeguard.

Harming the character of the historic centre would damage an economic asset. Congestion on constricted roads would increase.

Sustainable growth respects the constraints imposed by natural resources. In Guildford, sustainable upward or outward expansion is limited by the geography of a gap town. The Surrey Hills Area of Outstanding Natural Beauty rises to east and west and requires the highest level of landscape protection. The flood plain of the River Wey runs through the town and extends to the north and south. Significant parts of the town lie within the 5km protection zone of the Surrey Heaths Special Protection Area, a European habitat to the NW that we are obliged to safeguard.
Harming the character of the historic centre would damage an economic asset.
Despite the railways and A3 the transport infrastructure is poor in certain directions, notably to the north west and south east. Congestion on constricted roads would increase damaging the attractiveness of the town to business and commerce.
We strongly objected to the Panel and Proposed Changes’ higher district housing numbers for Guildford Borough which took the annual requirement from 322 to 422 dwellings, an increase of 100 dwellings pa. This represented a 31% increase in the figure the South East England Regional Assembly proposed which would have been challenge enough given the constraints in Guildford.
As the Panel report recognised, Guildford is close to the limit beyond which “town cramming and loss of urban quality” might be expected given the environmental constraints.
We considered that an increase of about a quarter in the number of households in Guildford town between 2006 and 2026 would cause unacceptable harm.
Development on this scale, largely to tackle overspill from London, would involve loss of urban quality and require major development in the Green Belt.
It was noted with concern that not only was the Green Belt to be reviewed to accommodate 2,000 new homes but also provision for a further 2,100 dwellings was required by Chapter 4 (14).
We considered that the proposal to place the additional 2000 dwellings, plus provision for a further 2,110 dwellings, in a single place to the north-east of the town would create a lop-sided addition to the town, an environmentally unsatisfactory new dormitory zone.
The Panel recognised that the environmental constraints prevent extension in direction other than the NE.
We submitted that in proposing an extension to the NE inadequate account has been taken of significant constraints in this direction.
In particular, flood risk excludes most land to the NE, and also potentially harmful air quality and recreational impacts on the Thames Basin Heaths SPA had not been given appropriate assessment to inform decisions.
The site, Gosden Hill, lies within the 5km SPA protection zone.
It would be helpful if the geographical and environmental constraints upon Guildford, which affect the potential for expansion, could be set out to assist the planning of future development:
A gap town in AONB downland:
Guildford is squeezed into a narrow gap in the North Downs.
The Surrey Hills Area of Outstanding Natural Beauty rises to the west and east.
This enjoys the highest level of landscape protection, namely the same as a National Park.
As well as protecting against inappropriate development on the Downs themselves, the Hobhouse principle applies which specifies that views from the designated downs should be protected in order to safeguard their natural beauty for the nation.

A pinch point in the road network
As a consequence of its gap location, Guilford lies at a pinch point in the road network.
Its historical roads are narrow and cannot cope with the current level of traffic through the town let alone the increase in traffic and parking that would come from a 27% increase in the number of households 2006-2026.
The road network in several directions is limited in its capacity and unlikely to be capable of improvement.
Present congestion already threatens the attractiveness of the town to business.
Even without the proposed uplift in growth, construction of the Hindhead Tunnel is already forecast to increase traffic in Guildford by 3%, constrained to this level only by the capacity of the A3 by Guildford.

Impact on Special Protection Area:
Internationally rare heath land lies to the north-west and must be protected from the pressures of development under the European Habitats Directive.
Housing built in the area suggested by the Inspectors would be within the 5km protection zone required to protect the Thames Basin Heath Special Protection Area.
It is one thing to accommodate modest household growth and diversification of the housing stock within this zone.
Hence, Suitable Alternative Natural Greenspaces are to be promoted in an attempt to deflect visitor pressure from the vulnerable lowland heath habitats.
It would be quite another matter to deliberately establish a very significant housing growth area within such close proximity to the SPA, especially when the SANGs proposed are existing areas of recreation rather than new recreational provision and when finding SANGS in the vicinity is proving a challenge.
With respect to the SPA, as was determined in the case of the Surrey Waste Plan, Appropriate Assessment should be undertaken at the strategic, planning allocation stage rather than left to the local or planning implementation stage.
The effectiveness of the policy of providing Suitable Alternative Natural Green Spaces to entice recreational users away from the SPA has yet to be tested.
The Sustainability Appraisal recommends no increase in the housing targets for 5 years until the effectiveness of SANGS in avoiding harm to the SPAs has been established.
This suggests it would be inappropriate to propose a significant uplift to the Guildford housing target within the 5km protections zone.
This would be especially questionable given that this extra housing would be to meet wider needs, such as London overspill, that could be met in other ways.
Also, great care will need to be taken to establish the air quality implications of expansion in the vicinity of the SPA. Guildford struggles to meet air quality standards for nitrous oxides and ozone in the vicinity of the A3 corridor through Guildford and in the town centre.
The increased congestion and traffic levels from a minimum of a further 8,000 to 10,000 dwelling in Guildford would risk adverse impact and acidification of the SPA habitat. (In its response to the Surrey waste plan in 2006, GBC objected to Guildford as a site for waste development because “Nitrogen Oxide emissions from an incinerator and associated traffic movements ... would add to existing emissions from traffic on A3 trunk road and M25 motorway, giving potential for breach of statutory air quality objectives).

Historic character
The town’s economy benefits greatly from the town’s historic character.
There are relatively few sites which have lower intensity uses within the town, usually due to flood risk.
Encouragement of too much high density, tall development will undermine the special qualities of the historic core of the town.

Flood Risk
A flood plain runs through the town and spreads to the south and north east.
It flooded significantly in 1968 and in 2000.
A significant proportion of what little less-developed land remains is in the floodplain, at risk of ground water and surface water flooding, or needed for flood water storage.
The Borough’s Site Allocations consultation process is exposing just how significant flood risk is on the few remaining more open sites.
On a regular basis, in accordance with the approach advocated in the Thames Catchment Flood Management Plan, land to the north east of Guildford is allowed to flood in order to accommodate water that would otherwise have inundated the town. Guildford exemplifies the strategy in Making Space for Water by respecting the positive water storage role of the natural flood plain.

The draft Regional Flood Risk Assessment and Thames Catchment Flood Management Plan both identify the need to retain the capacity of the naturally functioning flood plain to the North East of Guilford and to the South of Woking. This severely limits the potential for development in this area. In spite of this, 4(14) advocates provision is made for 4,110 homes when a Green Belt boundary review is undertaken with a view to developing in NE Guildford.

The sequential test as set out in PPS25 should be applied at the strategic level when housing allocations are being made. It would be unwise, given recent flooding across the country, as well as contrary to sequential test in PPS 25, to justify development in the floodplain rather than to identify areas of lower flood risk guided by strategic assessment.

**Green Belt:**

The town is encircled by Green Belt, a designation intended to prevent urban sprawl and coalescence. Significantly, it was created at a time of enormous pressure for post war housing growth. Its very purpose was to prevent us from taking the short sighted option and allowing inappropriate expansion of our towns. If we are now nudging up against the boundaries we set for ourselves (and, as the Inspectors recognise, the limits of intensification within the town’s boundaries are being reached), it is time for a new solution, such as new towns or expansion of less constrained towns, not a lifting of the limits we set. The importance of respecting environmental limits has been elevated in the Government’s recent review of its Sustainable Development Strategy.

**Cumulative and combined impacts**

Insufficient attention is paid in the draft Plan to cumulative and combined impacts. The environment is suffering with the current level of development.
Given the combination of constraints faced, the scale of growth proposed risks damaging the very qualities that underpin Guildford’s economic success.

The town needs to be able to compete, in an increasingly international market, as an attractive place to live.


“17. We therefore believe that decisions on where houses should be built should be based on a holistic assessment which takes account of local need, the capacity to accept new housing within existing boundaries, and the existing local infrastructure and environmental constraints. We believe this would produce the optimum sustainable allocation.”

“18. The methodology for this form of analysis is effectively the form of planning used to construct the more robust of the previous Structure Plans, and we suggest that this methodology should be revisited.”