



Please reply to : 6 Trinity Churchyard
Guildford
Surrey GU1 3RR
Tel: 01483 561930

www.guildfordvisiongroup.com

action@guildfordvisiongroup.com

22 January 2013

Carol Humphrey
Head of Planning Services
Planning Policy
Guildford Borough Council
Millmead
Guildford GU2 4BB

Via email to: planningpolicy@guildford.gov.uk

Dear Ms Humphrey

A. Local Plan SA/SEA Scoping Report (December 2012) Consultation Draft

Despite the consultation period of this important Scoping Document inconveniently running right across the Christmas holiday period, we at Guildford Vision Group (GVG) have reviewed its contents and context.

GVG Overview re Scoping Report

It seems to us that there are two fundamental issues with the Scoping report itself:

Firstly, in the absence of a clear long term vision or set of aspirations, the scoping document risks being a self-limiting, circular argument. It aims to help define a structure to deliver the limited goals provided by the planning authority, with particular reference to previous documents.

It overplays previous 'consultations', without enabling a full-scale dialogue with Guildford's residents and stakeholders (both Borough and Town). It presupposes what the evidence pack will look like, based on the disjointed and outdated Evidence Base that currently exists.

Thus, to a great extent, it seems to encourage the kind of short-sighted view we believe has been too prevalent for too many years. If GBC simply expects nothing much, this document surely provides a framework to deliver nothing much. We are concerned how this approach might adversely impact the formulation of the new Local Plan.

Key Point: There must be an explicit recognition that, whilst the Scoping Report may be a start of the process, it must be a living document and be capable of radical adaptation to whatever are the outcomes of a proper and wide-reaching dialogue with the Town and Borough, in line with the Council's own policy on Community Engagement, leading to the new Local Plan.

Secondly, within the 83 pages and the 12 sets of accompanying documents, a large proportion of the subject matter and content is outside the reach and influence of Guildford Borough Council (Guildford not being a unitary authority).

Furthermore, while the document itself is not intended to determine Council policy, it is likely to form the basis upon which policy is developed.

Consequently, the large proportion of the sustainability criteria is beyond the scope of Guildford Borough Council to deliver.

As a result, the Scoping Document risks creating a straitjacket in which Guildford is fundamentally unable to deliver the kind of holistic and radical solutions GVG has been calling for.

Key Point: The Scoping report should make it absolutely clear which elements of the Sustainability Base Line are within Guildford Borough Council's control and which are not. It should also make it clear what support it expects to call for and to obtain from other agencies in order to deliver each of its SA Objectives.

We would note that the shortcomings we have identified in general above are a tangible indication of the complexity involved in trying to make previous local planning policy frameworks fit within the National Planning Policy Framework (NPPF).

We have argued (and will continue to contend) that what is required – in particular as it relates to Guildford Town Centre – is a fresh approach with ambitious aims.

These should pick up on the positive directions from the NPPF such as are highlighted by URS, but from a perspective of enabling key infrastructure improvements through development – in particular in Paragraph 21 of NPPF where it says, inter alia: to “identify priority areas for ... infrastructure provision ...”

B. Guildford Local Plan Sustainability Appraisal Scoping Report - Consultation Response call: GBC letter of 11 December 2012

Additionally we have attempted to focus our response on the questions raised by Tanya Mankoo-Flatt, Principal Planning Policy Officer in her letter of 11 December 2012. Not all responses fit neatly into the formal response categories and we have provided a more detailed response below seriatim to those in her letter:

1. Are there any further policies, plans, programmes or strategies that should be considered in the SA context?

Absence of Masterplan should be noted: We believe that, as a formal document adopted by a number of residents' associations around Guildford, within the Borough, 'Aspirations for Guildford 2012' should be included in the scoping exercise.

Furthermore, the absence of a Master Plan for the town centre should be noted in the SA (please see our more detailed comments below at C.).

2. Is there any data that could further inform the baseline?

Important current data needed: We are concerned about the data sets that have been used – many are based on restatements of previous reports (the Roger Tym retail report, for example, relies on data that was collected in 2004 and applies some more recent analysis on top of that data; analysis of the current Valuation Office Rating List – available on line at www.voa.gov.uk – contradicts the underlying supply of retail space set out in the retail Report).

Full analysis of Rating List data needed: We believe that a full analysis of the different property types in the Rating List is called for – including a summary of the amount of property tax raised by each sector and ward – so as to ensure that the underlying economic performance and contribution to government revenues AND the scope for a baseline for potential Tax Incremental Financing schemes can be robustly drawn.

Summary of empty properties needed: Equally, from the Borough Council's own records, there should be a summary of empty properties across all sectors to inform strategies to bring those back into use (and a corresponding indicator to reduce standing vacancy levels in all sectors).

Better quality, integrated highway data and modelling: We are unimpressed by the quality of Highways data in the Evidence Base, the lack of integration of such data and the scope for modelling alternatives against the base data. Furthermore, we are aware that Surrey County Highways have information in map form to show which junctions have been modelled and when – a summary of this information would inform the Local Plan process and assist in setting a robust Baseline for the Sustainability Appraisal.

More clarity re public transport service needs: We are aware that there are major issues in terms of Guildford as a transportation hub – the bus station may be relocated or dispensed with, the station may be redeveloped, but overall, it is unclear that Guildford knows what level of service it needs to provide to support passengers and to ensure a sustainable and connected public transport infrastructure can be designed into the Local Plan policies.

Improved data re other forms of transport: Little data is available in respect of other forms of transport, for example:

- Parking spaces, fees, average duration of stay, purpose of visit;
- Park & Ride capacity, revenues, costs, intensity of usage;
- Cycle lanes – locations, usage, issues and aspirations;
- Pedestrians – routes, origins, destinations, facilities;
- Road Junctions – data links between traffic signals; capacity studies; impact of pedestrian crossings versus subways, etc.

3. Are there any further significant issues that are present in the borough?

Traffic No.1 Priority: Traffic is the major issue that prevents solutions to other problems and limits the ability to improve communities and, in particular, Guildford Town Centre. This is

noted as a problem of 'Congestion' in the Scoping Document and yet the problem is much more deep-seated.

The major pinch-points in the traffic network are typically governed by River(s), Rail and Major Trunk Road(s), a number with old, restrictive structures unsuited to handling modern traffic at key locations.

As examples, we list below the crossings over the River Wey in Guildford between Shalford and Burpham and the railway – mainline only – between Peasmarsh and Stoughton:

River Wey

- **A248** (Shalford) – restricted crossing with a bridge on a right-angle bend;
- *Millmead* (pedestrian)
- *Old Town Bridge/High Street* (pedestrian)
- **Onslow Street** (four lanes, Gyratory – no pedestrians)
- **Bridge Street** (three lanes, Gyratory – narrow pavements)
- *Bedford Road* (pedestrian)
- **A25** – Woodbridge Road (four lanes, Guildford ByPass) – tow path disappears under the bridges
- **A3** (through route with no access onto the road southbound after Ripley and no exit northbound after the Dennis Roundabout intersection)
- **A320** – Woking Road (after the river has turned 90 degrees)
- Clay Lane, Burpham

Mainline Railway

- **B3000** – New Pond Road
- **A3100** – Portsmouth Road (crossing from East to West)
- **A3100** – Portsmouth Road (crossing from West to East above tunnel)
- Mount Pleasant (restricted road crossing over tunnel)
- The Mount (no-through road crossing over tunnel)
- **A31** – Farnham Road Bridge (limited weight bridge erected in the 1850's before cars had been invented and before the Western suburbs of Guildford, the Hospital, Cathedral, University, etc., were developed)
- Station (pedestrian – restricted access)
- University (pedestrian)
- **A25** – Woodbridge Road (four lanes, Guildford ByPass) – tow path disappears under the bridges
- **A3** (through route with no access onto the road southbound after Ripley and no exit northbound after the Dennis Roundabout intersection)
- Stoughton Road (restricted access – single carriageway)
- Salt Box Road

Any intention to pedestrianize Bridge Street and create comfortable, safe pedestrian and cycle ways between the Station and the High Street will require a major rethinking of the traffic flows – especially through-traffic forced through the Gap town by poor long-term regional infrastructure.

The Scoping report needs to focus much more on the Baseline issues and the aspirations to find solutions.

4. Are there any additions or amendments that you recommend for the SA Framework?

Please see our more detailed comments below at C..

5. Is there any other data that should be included in the report? If so, please provide the source and reasons why it should be included.

Please see our more detailed comments below at C..

6. Do you have any comments/responses to the site appraisal criteria set out in Appendix A?

The site appraisal criteria are somewhat generic and it is difficult to see how some of these might apply in practice for particular types of development.

Does the formulaic approach suggest that particular uses will be targeted towards 'sweet' spots where they tick the most boxes?

If proposed residential development is given a green mark for being within 1600m of a secondary school, this does not provide any qualification as to whether the school has any spare capacity.

A one-dimensional formulaic approach might have some relevance but we are unaware as to whether the criteria suggested will facilitate sufficient development or effectively rule out most development.

This set of criteria, therefore, needs testing against existing settlements and developments to establish its validity.

Please see our more detailed review of the Scoping Document below at C.:

Yours sincerely



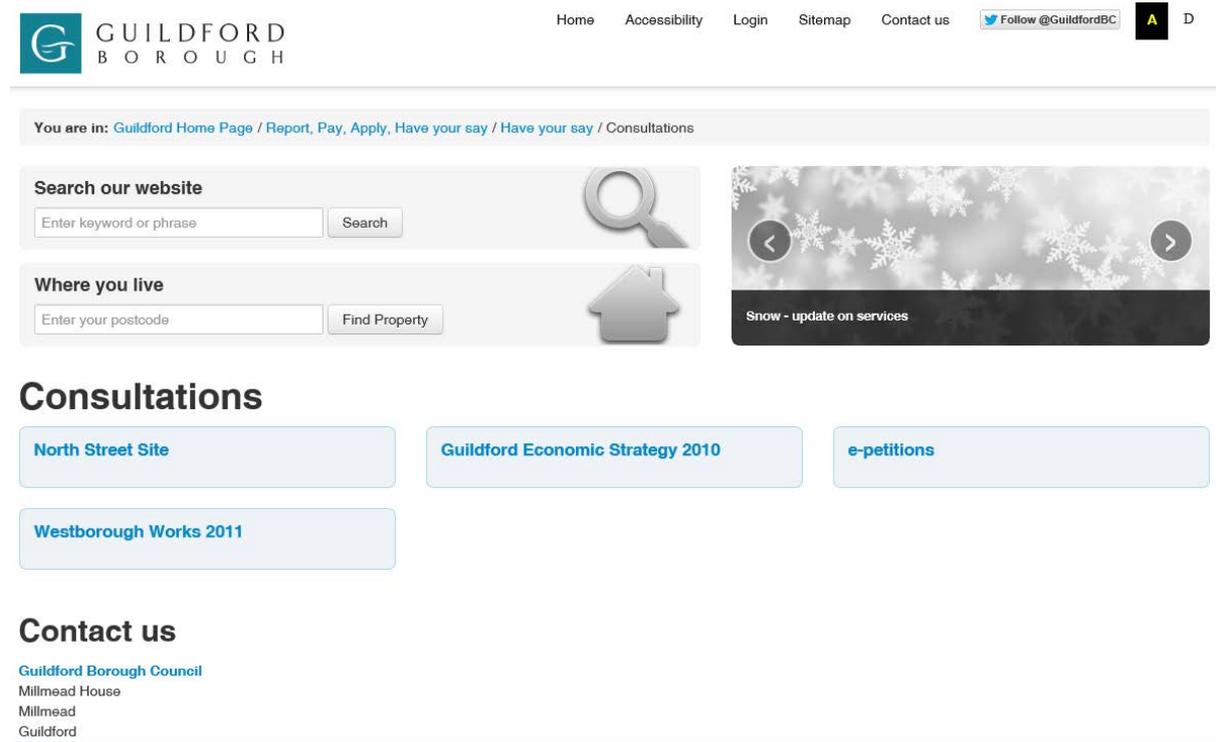
Bill Stokoe

Director, Vision for Guildford Ltd

C. Detailed GVG Comment: Local Plan SA/SEA Scoping Report (December 2012) Consultation Draft

Working sequentially through the document, we set out below our specific comments and concerns which sit alongside our main points (above).

Poor access to document: First of all we note that the document is not easy to find on the Council's website. This does not benefit a totally inclusive public engagement process. More worryingly, the 'Consultations' page of the Council's own website omits this particular document:



The screenshot shows the Guildford Borough Council website. At the top, there is a navigation menu with links for Home, Accessibility, Login, Sitemap, Contact us, and a social media follow button for @GuildfordBC. Below the navigation is a breadcrumb trail: "You are in: Guildford Home Page / Report, Pay, Apply, Have your say / Have your say / Consultations". The main content area includes a search bar with the text "Search our website" and a "Search" button. Below the search bar is a "Where you live" section with a "Find Property" button. To the right of the search bar is a banner for "Snow - update on services". Under the "Consultations" heading, there are four buttons: "North Street Site", "Guildford Economic Strategy 2010", "e-petitions", and "Westborough Works 2011". At the bottom, there is a "Contact us" section with the following text: "Guildford Borough Council, Millmead House, Millmead, Guildford".

Guildford Borough Council Website (accessed 12.15pm Sunday 20th January) – last updated 10th December 2012

<http://www.guildford.gov.uk/consultations>

Page ii)

Concerns re URS caveats: We are concerned by the caveats placed by URS on the information and sources it has used, including a lack of responsibility for accuracy and verification.

Due to the degree of reliance URS places on its terms of appointment, the appointment letter and any other relevant background information should be made public alongside the document itself.

Presumably the copyright restrictions and the 'personal' nature of the report (as stipulated by URS) do not preclude its proper use by the Council's contractors, ratepayers and other people with an interest in Guildford.

Page 1)

Scoping Assessment no substitute for proper public engagement re Local Plan on collective vision: URS make the establishment of the Scoping Assessment the first stage in the process of preparing the Local Plan.

This does not seem consistent with NPPF (155) which says: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses are essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a **collective vision and a set of agreed priorities for the sustainable development of the area**, including those contained in any neighbourhood plans that have been made.”

It seems to us that the risk to Guildford Borough Council is having to repeat this process in full if anyone comes up with alternatives through the Local Plan process that were not included in the original brief. Thus, iteratively:

- 1) For consultation to be credible, participants need to be able to suggest alternatives not previously considered and the confidence that, where alternative suggestions are well-founded, they will be acted upon;
- 2) Alternatives cannot be incorporated into the plan without consultation and a SA/SEA
- 3) The LPA needs to carry out consultation and a SA/SEA into alternatives
THEN
- 4) Return to step 1)
- 5) Repeat the process until all options have been exhausted.

The establishment of a baseline before the public engagement has begun would seem to us to add extra steps, AND will inevitably delay completion of the process.

If this consultation is to establish whether URS have captured the complete set of potential sustainability issues accurately, we would have to reserve judgement and the right under NPPF to have the opportunity to put forward views iteratively throughout the process. Therefore, in effect the baseline cannot be a baseline if it can be moved. Ergo, this exercise seems to us to be the first stage in a prescribed rather than consultative process.

Hence our first point, starting at Page 1, at the beginning of this response.

Page 2)

Effective public engagement vital to establish priorities, alongside good data: The Scoping Report states that it is covering six specific topics.

Items 1, 3 and 5 cannot really be answered without a process of engagement to evaluate priorities, threats, issues and opportunities. We would argue that, for Guildford’s economic heart at least, this has not been completed – a Master Planning exercise, properly conducted, would have provided a good basis from which to respond to these points.

Item 2 is not adequately dealt with in the URS report. The evidence base is of poor quality, is incomplete and is dis-integrated – far from the requirements of NPPF (158): “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”

Page 5)

Establish relevance of Regional Strategy to Local Plan: It would be helpful for the purposes of the Scoping Report to have a clear legal understanding as to the relevance of the Regional Strategy to Guildford’s Local Plan process, given the previous successful challenge to key elements of it.

Page 6)

Guildford needs longterm solutions, not sticking plasters re congestion vs development: The fourth bullet point refers to whether “the problems [are] reversible or irreversible, permanent or temporary”. In terms of specific long-dated issues of congestion in the centre of town, these can be resolved. However, the key issue is whether the Local Plan will accommodate opportunities for permanent solutions or will advocate ‘sticking plaster’ to reduce the impacts.

Here, in particular, the baseline should also refer to aspirations and best practice elsewhere, which should lead to real change. If the baseline is simply a measure of making sure the situation does not get worse, this suggests that developments such as Waitrose and Solum (not to mention North Street) simply could not be permitted. It will take major infrastructure improvement to enable the traffic impacts of such developments to be accommodated.

The fifth bullet questions “how difficult it would be to offset or remedy any damage”. Clearly, any Plan which advocates or permits the piecemeal development of key sites in Guildford would have the propensity (if not the probability) of causing widespread damage to and economic disadvantage for Guildford. The Local Plan will need to establish just what can and will be done to mitigate such effects. Far better to have started with a proper master plan, and to then analyse it within the sort of framework being proposed by this document.

Section 4 – Population

Longterm economic growth requires appropriate housing supply: It is reasonable to assume there is little Guildford Borough Council can do to manage population growth. However the shortage of housing will be a major feature – referred to later – and it is clear that the use of prime town centre housing land for supermarkets will prove to be inappropriate. This is especially so when the only alternative to accommodate an increase in households will be to eat into the green Belt.

There does not seem to be a clear rationale in this section as to why the expectation of population growth is as predicted – nor even why the projected growth rate is a straight line.

In order to form the base of a properly integrated scoping exercise, there should surely be reference in this section to the vital importance of economic growth and job creation as a means of ameliorating

the current areas of disadvantage, and the avoidance of new ones, as the population increases. This is not even met in sufficient detail in Section 6 – Economy & Employment.

Section 5 – Health

Concern re adequacy of health care infrastructure and exposure to congestion-related health issues: It is reasonable to assume there is little Guildford Borough Council can do with regard to healthcare facilities. Having said that, we note the comment at the top of page 13 to the effect that despite there being an adequate number of GPs, their surgeries are operating at capacity.

Provision of suitable facilities for GPs could be a part of the planning process for major residential schemes and could be influenced by the Local Plan; having said that, the issues and indicators at section 5.3 do not refer to this problem, and the need to provide sufficient GP surgery space does not feature as an objective.

This is an example of a general tendency for the document, in our view, to fail to reach emphatic and forward-thinking conclusions – often simply providing undeniable platitudes.

In Section 5.3, URS refer (number 2) to the “potential that air pollution could become an issue in some places as a result of localised congestion”. We would agree with this and this strongly bears out one of the areas of objection we raised in respect of the Waitrose application.

Failing to deal with the congestion in the town centre will, inevitably, lead to poorer air quality. There should be a much clearer statement preventing development where congestion is worsened and where air quality is consequently threatened. There is no reference in the SA/SEA Objectives at 5.4 to this point and we think this is an error of omission.

Section 6 – Economy & Employment

Key conclusions needed re nature of growth and impact of development. Lack of recognition of key contribution of knowledge economy: We are alarmed that URS, whilst referring to the 2009 Economic Report, fails to draw conclusions from it – especially failing to take on board the key obstacles to growth and the primary areas for focus referred to therein.

URS set out paragraphs 19, 21 and 23 of the NPPF.

URS also note from Paragraph 26 of the NPPF that “local planning authorities should require an impact assessment if the development is over a proportionate, locally-set floorspace threshold (if there is no locally set threshold, the default threshold is 2,500 sq m).

We think that, for the protection of Guildford’s town centre, this threshold should be set at no more than 1,500 square metres. Any greater amount and edge of centre sites could affect the ability to deliver the regeneration of the North street site.

On **page 18**, URS refer to many further education establishments in the Town and Borough but no reference is made to the lack of any real linkage between the University and the Town.

Despite the number of arts-based educational establishments, no reference is made to the cultural offering in the Town.

On **page 19**, URS note that “Surrey’s current economic success comes at the price of congested roads, pressure on infrastructure and high house prices. These problems of success may limit future economic growth if Surrey were to become a less attractive place to live and do business, especially in light of increasing competition from other high performing European and global regions.” The 2009 Economic Report for Guildford echoes these issues and highlights them as a major competitive disadvantage. This particular issue FAILS to make it into the list of objectives at the end of Section 6. This seems to be a manifest error of omission.

In Section 6, taken as a whole, there seems to be a disproportionate amount of text given over to Tourism. Which, it can be agreed, does benefit other sectors, but which is a relatively slim proportion of the overall economic generator for the Town and Borough.

The references to employment, in fact, are **notable for their absence of focus on the knowledge-based industries** which are inextricably linked with the University and the mutual success of both university and Research Park are critical factors in the future economic growth of Guildford and its place in the South East region. Most regions and Boroughs would be very jealous of Guildford’s high-technology jewel. This warrants much greater emphasis and fierce protection and scope for enhancement.

It is of paramount importance, in this context, that the poor road connections (both locally and regionally) to these facilities (and the nearby Royal Surrey County Hospital) are taken into account – especially recognising the shortcomings of the single bridge connection from the town (built before the motor car was even invented).

There should be objectives to improve the A3 junctions and to improve the crossings over the mainline railway from the town to the West.

Recognising the focus of employment and GVA in three wards (namely, Holy Trinity, Friary & St Nicholas and Onslow) means that a greater emphasis should be given to engaging with these three wards to ensure the burden on these areas is not too great. This should have been done in advance of the Scoping document to ensure the consequences of any increase in economic activity can be mitigated in some pre-planned way.

Offices – there is little or no reference to office development in the Scoping Report (it merits no attention other than in reciting the content of the NPPF). The well-being of the commercial business sector is of paramount importance and this must be recognised.

By contrast, Retail space is afforded considerable attention by URS attention though it is not mentioned that, together with distributive and retail activities, it only accounts for 15% of GVA (10% in the Centre). No mention is made of the various retail reports based on an original report produced in 2006 – based on 2004 data – which forecasts an absurd out of date growth rate of 3.3% for comparison shopping for each year for 16 years, and the Roger Tym and Cushman & Wakefield reports

which between them recommend that Guildford, in order to compete with other town centres must offer 60,000 square metres of retail space – potentially a 50% increase on current supply.

It seems inappropriate that such a major hypothesis of required additional development – including an assessment of the amount and type of retail both existing and proposed – should have been excluded from the Scoping Report. There should also have been reference to the existing mix of uses which could have been drawn from several sources such as the Valuation Office Agency's Rating List, directories and original, up-to-date research.

The references to the success of the Ladymead Retail Park should be tempered with a large note of caution. The Park has leases due to expire in the near future (say, within the next six or seven years) and it has Open A1 Retail use and so could become a competing retail centre to the town centre without requiring major planning consents. This threat is not even mentioned in the URS report.

There is a long section about the Town Centre as if it were the focal point of economic growth. It no longer is – or at least it does not hold any kind of monopoly on growth. At least an equivalent emphasis should be placed on the Research Park and its knowledge-based businesses, and on the University.

There is reference to an overreliance on the Public Sector. A reasonable knowledge of Guildford would illustrate that the University and the Hospital will account for a significant proportion of this overreliance. The University intends to keep growing and we have no desire to lose the hospital. It is likely, therefore, that the amount of Public Sector employment will increase rather than decrease.

In the 2009 Economic Report there are figures showing the average earnings of people WORKING in Guildford relative to the average earnings of people LIVING in Guildford. The charts clearly show that the higher value jobs are located outside Guildford (mostly probably in London) and that significant numbers of workers commute some distances into Guildford to work here; this is not really picked up by URS, nor are the infrastructure pressures that go with it.

When so much of the future well-being of Guildford depends on its position as an economic value generator, it is very disappointing to see the insipid nature of the objectives in this section AND the incompleteness of the issues and indicators.

Missing from this analysis is a comparison of sectors, taking account in each sector of average earnings, average contribution per worker to GVA, concentration of activity in each sector and, if possible, where the employees actually live (in the Borough or commuting).

There should also be a subsection (or even a separate section) relating to employees' specific needs, such as housing which they can afford, parking or public transport improvements, etc. This will be of particular importance in looking to grow the successful business clusters such as the Knowledge Sector.

Section 7 – Transport & Accessibility

More aspirational response required to tackle key infrastructure issue: This section seems hopelessly inadequate when so many of Guildford’s issues and its inability to make more of its environmental context, all predominantly stem from a very poor and failing traffic infrastructure and a very harsh urban environment due to the Gyratory system. Guildford’s context embraces its riverside and, for health and well-being, its pedestrian and cycling routes and linkages.

Almost all of the development to the west of the railway has happened since the 1920’s and yet no new rail crossing has been provided since before the invention of the motor car. Critically, as noted above, the business and employment focus of Guildford is concentrated in Holy Trinity and Friary & St Nicholas on the east side of the railway, and in Onslow to the west. With poor links and a low quality of environment (for example, between the town and the University and Cathedral), there is much scope for improvement.

The baseline MUST take into account that transport is a topic in which the town is failing badly.

Guildford’s 2009 Economic Study made it quite clear that the consequences of continuing failure are a general loss of business. GVG’s members are only too aware of the fact that major corporates do not consider Guildford as a potential destination because of congestion and a lack of housing their workers can afford. **The objectives must be much stronger than simply “to reduce road congestion and pollution levels”.**

Perhaps a better set of objectives would be:

- to take every opportunity to reduce congestion and, if possible, to reduce or eliminate through traffic from the town centre;
- to encourage people to walk to and around the town by creating pleasant and safe connections between attractions, transport infrastructure, shops and other major destinations;

Guildford has not signed up to the Government’s Plugged-in-Places (PiP) scheme and has no town centre charging places – notwithstanding the Waitrose planning approval requires charging points to be installed. If there is no PiP scheme, the infrastructure will not be consistent across the region.

Guildford could impose a Low Emissions Scheme (similar to those in key London Boroughs) to reduce or eliminate heavy goods vehicles and to require Surrey County Council to procure bus contracts with companies operating low-emissions buses. URS (at 7.3.1) suggest that Air Quality Management Areas should NOT be designated in the District, and yet they give no reason for that conclusion. A more realistic objective, therefore, would be:

- to reduce pollution by encouraging cleaner vehicles, discouraging heavy goods vehicles and discouraging traffic congestion

Specifically, there are omissions from the URS baseline description in the first paragraph of Section 7.2. For example, there is no reference to the A281 which carries a lot of traffic to and from Guildford (and, crucially, through the town).

On page 32 (apparently still within section 7.2) the congestion in the town is referenced, as are plans or ambitions to widen the availability of Park & Ride schemes. There is potential for conflict between this section and the NPPF (40 and 41) (referred to on page 29):

- “40. *Local authorities should seek to improve the quality of parking in town centres so that it is convenient, safe and secure, including appropriate provision for motorcycles. They should set appropriate parking charges that do not undermine the vitality of town centres. Parking enforcement should be proportionate.*
41. *Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice. “*

Car ownership and car use is, as noted by URS, higher than regional and national averages. The poor (and expensive) public transport infrastructure – and even the Park and Ride hours of operation – all serve to ensure reliance on private cars does not diminish.

Public policy ostensibly aimed at trying to force people out of their cars does not generally work in Guildford. It is imperative that the traffic systems, transportation systems, pedestrian and cycle links and parking strategies are all aligned, with the presumption in favour of supporting economic growth. Otherwise, a reliance on ideological theory could have the effect of continuing the migration of businesses away from the town.

Equally, there needs to be a much more positive aspiration and metric target – to eliminate surface car parks from the centre of Guildford over the Plan period. This should not be done by simply removing the spaces but by displacing them and using the resulting sites for development.

Section 8 – Crime & Safety

Design out crime and anti-social behaviour: It is reasonable to assume there is little Guildford Borough Council can do with regard to policing, and yet there are areas within the town centre (plus areas in other parts of the Borough) of specific concern.

The night economy in Guildford Town Centre creates no-go areas in the heart of the town and planning policy and effective comprehensive urban master planning should be able to design out many such issues over time.

Consequently, the issues at 8.2 and the insipid objective at 8.3 do not really advance the cause for designing out crime and antisocial behaviour.

Section 9 – Housing

No emphasis on need for adequate and appropriate housing supply: URS begin this section by quoting the NPPF (in particular Paragraph 47) and follow this with a number of charts which show that average house prices are substantially in excess of the national average (almost double) and the regional average (about 45% higher); they also show that average house prices are at more than 10 times average earnings, putting houses beyond the reach of lower income workers. Fewer than 8% of

households fall within the lower Council Tax Bands A & B, compared with a national average of almost 45% (South East region 26%).

This summary of the house prices bears out the findings of the 2009 Economic Report and the experience of our members in terms of Corporate Occupiers excluding Guildford from any shortlist of preferred locations due to lack of housing which their workforce could afford.

There is also no reference in the URS text to accommodation for key workers, which, when compared with the references in the Employment section to the Hospital, for example, suggests that the baseline and objectives are neither integrated nor complete.

Section 10 – Cultural Heritage

Development should respect Guildford’s heritage and unique ambience: URS begin this section by quoting the 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.*” URS justifies this quotation by reference to the need to “develop policies that set out the quality of development that will be expected for the area.” This represents good planning but URS then fails to incorporate any specific objective into its report to achieve this.

Equally, URS refers to the need to address “the connections between people and places”, again failing to take any cue from this in setting the objectives – despite the fact that connectivity and a lack of public squares or spaces have been identified by groups such as GVG as being of great importance to the future success of the town.

At 10.3 URS cite as the only indicator for this section that “Buildings on the at-risk register...should decrease”. For a town and Borough with the depth of heritage assets and resources, there must surely be more indicators against which to measure the Local Plan proposals when they are advanced.

The characteristics of Guildford as a Market Town, the County Town, an historic environment and its overall ambience need to be more strongly incorporated. Development of North Street, for example, should be directed towards enhancing the look and feel of Guildford rather than permitting any potential citadel development that would act as a barrier and that would fail to reflect the market town nature of Guildford.

Section 11 – Climate

Proposed objectives should not deter worthwhile development: It is reasonable to assume there is little Guildford Borough Council can do with regard to climate *per se*, but planning policy can influence behaviours and, whilst it might be desirable to seek to impose artificial targets (reducing car use, for example) it is clear that Guildford Borough Council’s leadership of this issue must be set in a context of the other objectives.

Guildford has a series of flood plains and it also has substantial development potential in the river corridor (see our responses to Section 14 – Water).

The indicators and objectives put forward by URS seem fairly generic but they could impose a straitjacket on marginal development. It is important that these indicators and objectives are contextualised in the overall Sustainability Appraisal and that the Planning Policies in the Local Plan allow for some form of off-setting where developments cannot themselves achieve the standards recommended (for reasons of economic or physical constraints – such as operating in a Conservation Area or where infrastructure or economics do not permit it on site) and thus contribute to the overall carbon efficiency in other ways.

Section 12 – Air

No particular comments that have not already been made elsewhere in our response.

Section 13 - Soil

Recent GBC planning decision and pipeline proposals risk proper respect for town centre environment: Page 55 notes the former presence of the Guildford Iron Foundry – part of this was at Church Acre Iron Works and the buildings still exist. They are due shortly to be demolished as part of the Waitrose development. Given that very little attention seemed to have been paid to the environmental investigation and remediation of the site as part of the planning process, it seems difficult to envisage quite how Local Plan policy can be contrived to ensure this is more robust in future.

At 13.5, URS makes reference (SA Objective 7) to making the best use of previously developed land and existing buildings. Again, with reference to the Waitrose site, the use of town centre land for open air parking hardly seems to meet this objective and yet the precedent has been set.

GVG finds itself at odds, not with URS's comments in this section but with the Guildford Borough Council Planning Department's recent decision at Waitrose and the precedent it has set – if this were equally applied on the other town centre sites, eg Solum, the shortfall in housing would increase, the intensity of use of key urban sites would be reduced and the traffic congestion would increase with its consequent impact on business generation and air quality.

Section 14 – Water

Need to re-examine case for development in flood plain: This section on Water quality and rivers is largely outside the control of Guildford Borough Council.

The rather short reference to flood risk and dwellings in the flood plain (which spans both this section and Section 11 – Climate) belies the fact that Guildford has a rather tightly drawn Green Belt boundary, relatively few sites for major new residential quarters, and that some of the most desirable real estate (and yet underused) is in the river corridor – such as the area from the mainline Station to the bypass at Ladymead which could accommodate varying estimates of 2,000, 4,000 or even 6,000 dwellings.

There needs to be a very clear set of guidelines but also a major discussion amongst the community to establish what could be developed without unnecessary or increased risk from flooding. This could

play a crucial part in helping to reach the required number of residential units in the most sustainable way.

The indicators and objectives with regard to homes and water are too negative and must surely have regard to the other objectives in the Scoping report.

Section 15 – Biodiversity

This section on Biodiversity is largely outside the control of Guildford Borough Council, other than to identify the areas which need to be protected and formulating the relevant policies to achieve this.

Section 16 - Landscape

Development should enhance and exploit Guildford's setting: This section is important for its context for existing and potential future development. Whilst wishing to retain and enhance the landscape, there needs to be a careful fresh look at the views that currently exist and those that could be created in the context of urban development in Guildford.

The North Street site needs to be carefully considered, for example, in terms of its impact on the roofline and views into and out of Guildford, etc. It is important, however, that the desire to retain all current views and viewpoints does not preclude viable development which could enhance the town for the majority but might require some compromises.

A robust process for engagement with the town and its stakeholders would help to clarify those views which must be protected at all costs and those which may be varied through development.

The proposal suggested at Solum's public meeting of an eight storey 'wall' in front of the station may in fact have a greater adverse impact on the skyline than a taller, narrower building (notwithstanding any objections that may exist to the scheme in any event). The careful assessment of all developments in terms of rooflines, views and overall environmental/landscape quality must be incorporated in some way in the Local Plan so as not to frustrate development but to control its impact. The need to have such controls in the Local Plan should, therefore, be outlined in the URS report.

URS's reference to the Green Belt is probably at odds with the Government's policies with regard to allowing some breaches of Green Belt to make more residential land available in order to help reduce house prices.

Section 17 – Waste

Management of waste should feature in new development: Broadly this section is fairly comprehensive and reflects activities of other departments within Guildford Borough Council.

As far as the Local Plan goes, GVG believes there should be more planning-specific context. For example, new developments should be designed to accommodate appropriate waste management systems; developments during construction should actively manage construction waste so as to avoid creating it in the first place.

In terms of the town centre, there needs to be a much tougher stance on waste management such that waste collection does not interfere with pedestrianized areas, and that rubbish bags or bins are not left out in the main public areas to the detriment of access and aesthetics.

Section 18 – Sustainability Appraisal Methodology

Scoping process & Assessments must accommodate outcomes of Local Plan consultation: The second paragraph of this section highlights the points we made above (referring to Page 1 of the URS report).

We make no apology for repeating the gist here:

It seems to us that the risk to Guildford Borough Council is to have to repeat this process in full if anyone comes up with alternatives through the Local Plan process that were not included in the original brief:

- 1) For consultation to be credible, participants need to be able to suggest alternatives not previously considered and the confidence that where alternative suggestions are well-founded they will be acted upon;
- 2) Alternatives cannot be incorporated into the Plan without consultation and SA/SEA
- 3) LPA needs to carry out consultation and SA/SEA into alternatives
THEN
- 4) Return to step 1)
- 5) Repeat the process until all options have been exhausted.

The establishment of a baseline before the public engagement has begun would seem to us to add extra steps AND will inevitably delay completion of the process.

Given that much of the impact from development and the development itself will take place in the Town Centre and that there is no holistic master plan for the town, the Sustainability Assessment will have to be undertaken many more times than would otherwise have been the case – a Master Plan would have provided a Baseline of its own.

Any savings that might have been presumed to be achieved by not bringing forward a comprehensive Master Plan will be systematically dissipated through this process and the lead time for an appropriate Plan for the town will be greatly increased.

GVG, consequently, reiterates its call for a holistic masterplanning exercise for Guildford's business area and its links to the rest of the Borough and region.

Section 19 – Conclusion and Next Steps

A number of key issues have been either understated or omitted, especially around traffic & transportation: The only data gap identified by URS relates to Tourism.

We are aware of a number of data gaps or of non-current information, and 'current' data that has been based on evidence from 5 to 10 years ago when economic conditions were different; the overall policy environment and communications technology has been greatly advanced in the meantime.

The most glaring gaps in our view are in the traffic and transportation data (there is no current comprehensive model, although we are aware that some exercise is on-going in this regard), and in the retail capacity report.

A comprehensive Master Plan for Guildford would have provided the majority of this data as a critical part of the process.

Therefore, we do not concur that, overall, the Baseline Report does confirm the majority of Sustainability Analysis issues identified. We believe a number of key issues have been either understated or omitted.

Vision for Guildford Limited

22 January 2013