

Borough, Economy and Infrastructure Executive Advisory Board

13 April 2016

Briefing Note in relation to the Proposed Submission Local Plan: Strategy and Sites (appended to this report)

1. Introduction

- 1.1 The Proposed Submission Local Plan: strategy and sites (“the draft Local Plan”) outlines the spatial development strategy for the borough up to 2033. The Plan sets out the level and location of development based on an evaluation of our objectively assessed need (OAN) for new homes, employment and retail space and an assessment of whether this quantum of development can be provided in a sustainable way following consideration of other policy constraints. The Proposed Submission Local Plan is also concerned with the protection and enhancement of our environment, the provision of appropriate infrastructure to support the planned growth of the borough and the promotion of sustainable transport. We intend to consult on the Proposed Submission Local Plan for 6 weeks commencing 6 June 2016. We will review all comments and representations made during the consultation process to ensure that the Local Plan we submit to the Secretary of State is sound.
- 1.2 The Proposed Submission Local Plan is structured around four central themes closely linked to the objectives of the Council’s Corporate Plan (2015-2020). Policies are grouped into one of the six following categories: strategic, housing, protecting, design, infrastructure and delivery.
- 1.3 The Proposed Submission Local Plan must undergo a number of statutory processes, including a public consultation, in order to progress towards an examination in public and eventual adoption. As officers we are asking the Executive Advisory Board to agree that the Executive should recommend to the extraordinary Council meeting on 24 May 2016 that the Proposed Submission Local Plan document be published for consultation for a period of 6 weeks (commencing 6 June 2016) and that the Interim Director of Development be authorised, in consultation with the Leader of the Council, to make such minor amendments or typographical changes to the document he considers necessary following the extraordinary Council meeting.
- 1.4 The purpose of this report is to outline what the Proposed Submission Local Plan is and how the document has evolved from the previous document.

2. Background

- 2.1 The current Local Plan was adopted in 2003. Policies from the 2003 Local Plan were saved for development control purposes pursuant to the transitional provisions set out in the 2004 Act. Once the new Local Plan: strategy and sites is adopted, it will, where relevant, supersede the various saved policies from the 2003 Local Plan. The second part of the

Proposed Submission Local Plan: delivering development will provide policies that relate to development control matters. The two constituent elements of the Proposed Submission Local Plan will, once adopted, supersede all of the saved 2003 policies.

- 2.2 The policies of the Proposed Local Plan have been prepared to accord with the National Planning Policy Framework (NPPF) and the Localism Act 2011 (including the Duty to Cooperate). In preparing the Proposed Submission Local Plan officers have also had regard to requirements of the Planning and Compulsory Act (2004) and the Town and Country Planning Regulations (2012). The National Planning Practice Guidance has also guided us throughout the plan-making process.

3. Changes to the Draft Plan

Responses received

- 3.1 Alterations to the plan have been driven by two main factors namely the responses received through the consultation process and the evolving evidence base . Firstly the responses received as part of the consultation into the regulation 18 draft Plan. In July 2014 the Council undertook a twelve week public consultation on the Draft Local Plan: strategy and sites. Over twenty thousand responses were received from a range of stakeholders including the community, local businesses and other local public sector organisations. These responses have been analysed and where considered appropriate have informed alterations to the draft plan. A summary of Key themes from the consultation was published in December 2014.
- 3.2 Those issues that received most objections were:
- the absence or validity of the evidence base
 - the scale of development being promoted
 - the resulting harm to the countryside and green belt from pursuing this scale of growth
 - the inability of the infrastructure to cope with and keep pace with this level of growth.
 - Closely related to these views was the belief that the plan sought to meet OAN without applying appropriate constraints, especially in relation to the Green Belt.

New Evidence base

- 3.3 New evidence commissioned and published since the publication of the Draft Local Plan includes;
- The West Surrey Strategic Housing Market Assessment (SHMA),
 - The Employment Land Needs Assessment (ELNA)
 - The Retail and Leisure Needs study
 - Land Availability Assessment
 - Level 1 Strategic Flood Risk Assessment.

- 3.4 In addition to the above one item of evidence that was not available at the time the draft Local Plan was being prepared was the Green Belt sensitivity map. This was produced in response to the Joint Scrutiny Committee review of the evidence base, which involved residents and other stakeholders, during which they raised concerns or issues with the methodologies. Further work was carried out on the Green Belt and Countryside Study (GBCS) as a result – in particular the production of Volume II addendum. A key change was the way in which two of the Green Belt purposes were scored. This update included the production of the Green Belt sensitivity map. It was colour coded - green meant the land parcel scored 1/4 of the assessed Green Belt purposes, yellow meant it scored 2/4 and red meant it scored 3/4 or 4/4. This map has been used as a further targeted constraint in arriving at the amended proposal sites as described below.
- 3.5 Work has also been undertaken in relation to possible development sites within Guildford Town Centre. This work is important in ensuring the emerging plan makes the best use of brownfield sites in the first instance for high trip generating uses and also for residential use. Only those sites that can be shown to be 'deliverable', as per the definition on the NPPF, within the lifetime of the Local Plan can be included as proposal sites.

4. Alteration to the spatial strategy

- 4.1 A new set of documents produced to identify OAN in relation to housing, employment and retail and leisure was published on 2 October 2015. The housing document, the SHMA was produced jointly with Waverley Borough Council and Woking Borough Council as the three boroughs are considered to constitute the Strategic Housing Market area. Officers consider the documents to be robust and they form the starting point for the plan making process which needs to explore if this need can be met or if doing so would create such adverse impacts that would significantly and demonstrably outweigh the benefits of meeting the OAN. The objectively assessed need is 693 dwellings per annum.
- 4.2 The draft Local Plan (July 2014) included as part of Policy 2 the preferred spatial hierarchy. This sets out the order of preference in terms of the type of locations we would wish to direct growth to. This hierarchy remains the most sustainable options for growth and will therefore remain the hierarchy as we move forward.
- 4.3 In the first instance, we will direct development to the most sustainable locations. These are:
- Guildford town centre
 - Urban areas
 - Inset villages
 - Identified Green Belt villages

4.4 However, these locations are unable to accommodate a sufficient level of development to satisfy our growth needs and we therefore needed to explore the extent to which other types of development options can help contribute towards meeting our need. These are as follows:

- Countryside beyond the Green Belt (CBGB)
- Urban extensions
- New settlement at the former Wisley airfield
- Development around villages

4.5 As part of demonstrating whether we are able to meet our need, we need to look at each spatial option and consider whether the benefits of providing more homes (either by identifying more sites within each or by exploring the next option) outweighs the harm associated with doing so. A considerable level of the feedback we received as part of the last consultation referred to there having been not enough consideration of the harm associated with development and that there is the need for a more stringent application of constraints, particularly with regards to the Green Belt. We have sought to respond to this by considering a different spatial strategy that would achieve this outcome, whilst still being capable of being found sound.

5. Use of the Green Belt sensitivity map

5.1 We therefore consider the following spatial strategy addresses the key concerns raised by both councillors and residents, and places greater emphasis on the need to protect the Green Belt from inappropriate harm.

- The first set of four spatial options remain unchanged – we will still seek to maximise appropriate opportunities for development in these locations.
- Countryside beyond the Green Belt – we will continue to utilise potential development areas that were identified in the GBCS on Countryside beyond the Green Belt land where appropriate but we will also recommend alteration to the Green Belt boundary which creates additional Green Belt land.
- Urban extensions – around Guildford we will apply the Green Belt sensitivity scoring and exclude any sites that fall within a red (high sensitivity) land parcel. Given that Guildford town is our most sustainable settlement and this option falls fairly high in our hierarchy, there are good reasons to explore both green (low sensitivity) and yellow (medium sensitivity) land parcels.
- New settlement at the former Wisley airfield (partly brownfield) – this site is located in a yellow land parcel. Given the sustainability merits of strategic sites due to the infrastructure that can be provided alongside them and the NPPF support given to this development option, this site would also remain in the plan.

- Development around villages – this option can be a sustainable option so long as careful consideration is given to the choice of location and the infrastructure needs of the village. The NPPF also supports this option particularly where it supports or enhances the vitality of the rural area. However, given it is lower in the hierarchy than the strategic sites, we consider that there is an argument to limit growth in this area to those sites that are located in a green (low sensitivity) land parcel only.
- 5.2 The draft Local Plan already places great weight in seeking to protect the AONB. We would seek to strengthen this in the proposed strategy by excluding any major development unless, as with Green Belt, there was an over-riding reason that justified a departure from this. This means that the site at Farncombe, on New Pond Road, would now be excluded.
- 5.3 Whilst the above rationale would apply in most instances, there are nevertheless instances when it is appropriate to deviate from this in order to deliver wider strategic objectives. There are three exceptions to this approach contained within this plan. Firstly the need to provide a secondary school within the west of the borough. Working closely with Surrey County Council we have concluded that it is appropriate to provide a secondary school on a new proposal site at Greater Normandy and Flexford that was previously safeguarded in the 2014 plan. The site will provide for 1,100 dwellings, travelling show people sites and a 4 form entry secondary school. The site is served by Wanborough station and is well placed to serve both the urban area of Ash and the urban area of Guildford. No other preferable sites have been identified for a school site and this is therefore considered to justify an exception to our strategy and justify building on this sensitive green belt site. There are also considered to be positive impacts on providing services to the existing villages of Normandy and Flexford.
- 5.4 Secondly the Burnt Common triangle site whilst located in a ‘yellow’ land parcel is proposed to be allocated for industrial use and housing. The fact that it is partly previously developed and that it is required to help meet our industrial need provides the justification for the allocation.
- 5.5 Thirdly, traveller accommodation. We are required to meet the needs of all groups in our community and this includes travellers and travelling showpeople. In order to ensure that such allocations are realistically deliverable, and thereby ensure that the Local Plan is sound in this respect, it will be necessary to inset any proposed allocations from the Green Belt. Given the difficulties in identifying sites that are suitable, available and deliverable, and the current location of temporary permissions, these may need to be located in green, yellow or red land parcels.

6. Infrastructure

6.1 The Council and infrastructure delivery partners have considered what infrastructure will be needed to support the housing, employment and retail development planned.

6.2 We have identified where expanded and new schools and GPs' surgeries will be needed, upgrades to utilities, and where communities would benefit from new allotments and surface water flooding reduction measures. Over half of all planned housing over the plan period will be on strategic sites, making up a greater proportion of new housing after the first five years. These sites offered us the opportunity to secure supporting infrastructure, and their site allocations include the infrastructure they will need to ensure these new communities are sustainable and do not further pressure existing infrastructure. Whilst expansion of many schools in Guildford town is being planned, these strategic sites offer land for new primary and secondary schools to serve these new communities.

Transport Infrastructure

6.3 The Council has engaged closely with the key transport infrastructure and service providers, and key funders, in order to build support for a programme of transport schemes that we set out in the Proposed Submission Local Plan. This programme includes:

- New rail stations at Guildford West (Park Barn) and Merrow
- The Sustainable Movement Corridor, implemented in sections during the plan period, providing a priority route for buses, pedestrians and cyclists through the Guildford urban area, and serving new communities at Blackwell Farm, SARP and Gosden Hill Farm including the new Park and Ride site, the new Guildford West (Park Barn) and Guildford East (Merrow) rail stations, the Onslow Park and Ride, both of the University of Surrey's campuses, the town centre and Guildford rail station.
- Over twenty schemes to address 'hotspots' on the Local Road Network, including at the A3/Egerton Road Tesco roundabout, the A331 Blackwater Valley Route/A31 Hog's Back junction, and a road bridge to allow the closure of the Ash rail station level crossing
- The Department for Transport's Road Investment Strategy schemes, including for the A3 Guildford and the M25 Junction 10/A3 Wisley interchange, with interim 'Quick Win' schemes to deliver road safety and some congestion relief on the A3 Guildford in the first ten years of the plan period.

6.4 The schemes that we consider are necessary for the delivery of the Proposed Submission Local Plan are written into the plan in the Infrastructure Schedule at Appendix C. This is consistent with National Planning Policy Guidance ('Local Plans' paragraph 18). It should be noted that the delivery of the scale of development contained within the Proposed Submission Local Plan is contingent on the delivery of the necessary infrastructure. This crucially applies to the improvements to the A3 if the delivery of housing numbers in the later stages of the Plan period are to be realised.

6.5 A Guildford Borough Transport Strategy report, setting out the case for these schemes, plus a smaller number of aspirational, but realistic, schemes which we consider it is appropriate

to promote at this time, will be considered by Executive on 19 April. The programme will also be set out in the forthcoming Infrastructure Delivery Plan (IDP), with additional supporting evidence in the forthcoming Transport Topic Paper.

- 6.6 A new Strategic Transport Assessment is currently being prepared with Surrey County Council and will be published in May. This assessment follows and builds on earlier strategic transport assessments, but will be different in that, firstly, it will assess the growth scenario that represents the spatial strategy in the Proposed Submission Local Plan, and secondly, it will assess the mitigation provided by the programme of transport schemes described above. These points are elaborated below.
- 6.7 The previous strategic transport assessments, as published on the Council's website, considered a range of growth scenarios representing different quantum's and distributions of potential development in the borough. The most recently published previous assessment, the Options Growth Scenarios Transport Assessment Report (Surrey County Council, January 2014) (OGSTAR), assessed a range of such growth scenarios, but due to the lead-in times and the resources required to prepare a new assessment, none of these scenarios matched the proposed spatial strategy as set out in the 2014 Draft Local Plan. In the absence of a growth scenario matching the spatial strategy in the 2014 Draft Local Plan, we opted to use Scenario 7 from OGSTAR to inform consequential analyses and to inform discussions with stakeholders and partners.
- 6.8 However, the quantum of planned growth in the borough as set out the spatial strategy for the Proposed Submission Local Plan is significantly less than that represented in Scenario 7 from OGSTAR. OGSTAR's Scenario 7 can thus be regarded as a 'worst case' in terms of transport 'demand'.
- 6.9 On the second point, the previous strategic transport assessments, including OGSTAR, also represented a 'worst case' assessment in terms of transport 'supply', in that they assessed potential future transport impacts of growth scenarios in the absence of any future transport schemes, other than those fully funded at that time.
- 6.10 In contrast, the new strategic transport assessment will assess the mitigation provided by proposed key transport schemes as described earlier. This will build on a series of model tests that have been undertaken by Surrey County Council on our behalf over the past year which have assessed the potential mitigation provided by various scheme options. This technical work leads us to believe that the proposed programme of transport schemes described earlier will tackle the historic infrastructure deficit and mitigate the principal transport impacts of planned growth in the borough during the plan period.

7. Content of the Plan

Policies

- 7.1 The Draft Plan remains primarily a strategic document that allocates sites to meet OAN. The policies are grouped under headings of Strategic, Housing, Protecting, Economy, Design,

Infrastructure and Site Allocations. In addition to the strategic policies there are three areas where more detailed policies are provided. This is to enable the aims of the strategic policies within those topic areas to be implemented as part of the development management process. The three areas are Employment uses, Retail uses in centres and the Green Belt.

- 7.2 The Employment policies are designed to direct development to appropriate locations and to protect existing uses by requiring significant evidence of marketing. The level of marketing evidence required is set higher for the Strategic sites than for the sites further down the hierarchy.
- 7.3 The Retail policies define the retail core in Guildford town centre and both the primary and secondary retail frontages in order to seek to maintain a high proportion of A1 retail units. The District and Local centres are also designated and afforded protection.
- 7.4 The Green Belt policy now defines villages within the borough. The majority of villages have their settlement areas defined on the proposals map but the less cohesive are not defined and it will be for the decision maker to assess if a proposal falls within the village. The plan does not define 'disproportionate' or 'materially larger' but signals that a supplementary Planning Document (SPD) will be produced to accompany this policy.

Site Allocations - Strategic Sites

- 7.5 The strategic sites contained within the reg 18 version of the plan are all retained within the Proposed Draft Plan (Blackwell Farm, Gosden Hill, former Wisley airfield and Slyfield Area Regeneration Project). The quantum of development has been reduced at Blackwell Farm from 2250 to 1800. This is in response to the sensitivity of the southern part of the site. In addition a new strategic site has been created at Normandy and Flexford, as detailed earlier in this briefing note. A large site in Effingham has been removed as has a site at Liddington Hall and a site at Fairlands is no longer safeguarded for future development. These changes relate in part to the use of the Green Belt sensitivity work. A number of sites have been removed around Send and a site adjacent to West Horsley. A number of sites have been removed from the plan within the town centre in light of applying flooding constraints.
- 7.6 Additional Retail proposals remains focused within the town centre of Guildford. Some local facilities will be provided in the new strategic sites including both retail and employment. New Employment floorspace is still dominated by the extension to the Surrey Research Park and a HQ office proposal at part of the Gosden Hill site.
- 7.7 Only sites of over 25 residential units will be shown on the Proposal Map but smaller sites contained in the LAA will contribute to the overall housing supply as will a 'windfall' element based on past small site completions.
- 7.8 Additional Green Belt land has been designated around the Ash and Tongham urban area and Ash Green in part to provide ongoing separation between the settlements and in part a reflection of the quantum of development recently completed and proposed within the area.

8. Summary

- 8.1 This note seeks to focus on the changes made to the draft Local Plan and the reasoning behind those changes. Much of the evidence base has been updated and, together with the representations received as part of the formal consultation process, has been instrumental in informing changes to the plan. The use of the spatial hierarchy to accommodate sustainable development remains fundamentally unchanged. However, the use of the Sustainability Appraisal and the Green Belt sensitivity assessment have resulted in significant changes to the plans site allocations. The site allocations are concentrated on larger sites and a number of allocations on Green Belt sites of high sensitivity have been removed from the plan.
- 8.2 Three exceptions to this approach demonstrate it has not been slavishly followed.
- The new strategic site at Normandy and Flexford, which was previously safeguarded for future development, has been allocated for 1100 units and will contain a 7 form secondary school. The sustainability of the site is further increased through the rail station and the critical mass created to help the existing villages support day to day services and facilities.
 - Burnt Common provides land to meet industrial need and
 - Existing gypsy and traveller sites with temporary planning consents
- 8.3 The Blackwell Farm site has had its capacity reduced from 2250 to 1800 in response to reducing the impact on the AONB/AGLV and the sensitive green belt adjacent to the A31.
- 8.4 Secondary school accommodation is now to be provided on three of the strategic sites, namely Gosden Hill, Wisley, and Normandy and Flexford.
- 8.5 The scale of development contained within the Proposed Submission Local Plan can only be delivered in a sustainable way if the necessary infrastructure is provided. This crucially applies to the improvements to the A3 if the delivery of housing numbers in the later stages of the Plan period are to be realised.
- 8.6 More detailed policies are contained within the Plan in relation to the topic areas of Retail, Employment and Green Belt. This will enable the related strategic policies to be implemented without the need to wait for the Development Management policies to be delivered as part 2 of the Local Plan.