

Full Council report

Ward(s) affected: All

Report of Interim Director of Development

Author: Stuart Harrison

Tel: 01483 444512

Email: stuart.harrison@guildford.gov.uk

Lead Councillor responsible: Paul Spooner

Tel: 07836 753647

Email: paul.spooner@guildford.gov.uk

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## Proposed Submission Local Plan

### Executive Summary

The Proposed Submission Local Plan: strategy and sites (“the draft Local Plan”) outlines the spatial development strategy for the borough up to 2033. The draft Local Plan sets out the quantum 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 conclusion reached is that appropriate sustainable sites can be allocated within the plan to meet the OAN for both housing and employment.

The draft 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.

This draft Local Plan contains significant changes from the Draft Guildford Borough Local Plan: strategy and sites (July 2014). The changes reflect consideration of the changes to the evidence base and the representations received through the consultation process.

It is proposed to consult on the draft Local Plan for six weeks commencing 6 June 2016. Following this period, all comments and representations formally made during the consultation period will be considered. Consideration will then be given to any amendments deemed to be necessary to the plan and a decision taken on whether to consult further or to formally submit the plan to the Secretary of State.

The Draft Local Plan (Appendix 2) 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 following categories: strategic, housing, protecting, economy, design, infrastructure and delivery.

The purpose of this report is to outline what the draft Local Plan is, how the document

has evolved from previous documents and the next steps in the plan-making process.

**Recommendation to Council:**

- (1) That the draft Local Plan: strategy and sites document, as submitted to the Council, be approved for formal public consultation for a period of six weeks beginning 6 June 2016.
- (2) That the Interim Director of Development be authorised, in consultation with the Leader of the Council, to make such minor alterations to improve the clarity of the document as he may deem necessary.

Reasons for Recommendation:

The draft Local Plan builds upon the Council's previously published Guildford borough Local Plan Strategy and Sites Issues and Options (2013), Draft Guildford borough Local Plan: strategy and sites (2014) and evolving evidence base. It provides a coherent approach to future development and allocates sites to accommodate sustainable development in the borough up to 2033. The document is considered to be positively prepared, justified, effective and consistent with national policy.

The recommendations above are made to encourage the Council to:

- (1) Enable the draft Local Plan: strategy and sites document to be published for public consultation.
- (2) Allow officers to undertake public consultation in line with the Town and Country Planning (Local Planning) (England) Regulations 2012, the Localism Act 2011, the Planning and Compulsory Purchase Act 2004, the National Planning Policy Framework 2012, Planning Policy for Traveller Sites 2015, the National Planning Practice Guidance, and the adopted Statement of Community Involvement 2013 known as Community Engagement in Planning.

Undertaking a public consultation on the draft Local Plan is a statutory requirement placed on Local Planning Authorities under Regulation 19 of the Town and Country Planning Act and will enable the Council to move a step closer to adopting an up-to-date Local Plan.

**1. Purpose of Report**

- 1.1 The draft 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. This report seeks Full Council authority to publish the draft Local Plan document (see Appendix 2) for consultation for a period of six weeks commencing 6 June 2016 and to allow for any necessary minor amendments or typographical changes to be made following the Council meeting.

## **2. Strategic Priorities**

- 2.1 The production of the draft Local Plan is a statutory requirement and will help the Council meet its strategic priorities. Once adopted, the Local Plan will enable the Council to provide for the needs of the community whilst promoting the area as a visitor destination, enhancing the rural and urban economy and protecting the borough's special built and natural environment. The Plan is therefore vital to achieving the Council's ambition to improve our society for the benefit of all residents. Whilst seeking to meet needs we have applied appropriate constraints and will ensure that growth is conditional upon the delivery of all crucial infrastructure, without which it would be unsustainable.
- 2.2 The draft Local Plan sets out a vision for the borough closely aligned to that included within the Council's Strategic Framework. The draft Local Plan will provide a framework for development in the borough to ensure that Guildford's growth is sustainable and meets the needs of the existing and future populations. It is based upon thirteen strategic objectives, which are framed within one of the following four core themes: society, environment, economy and infrastructure. These strategic objectives build upon the five fundamental themes identified in the Council's Strategic Framework.

## **3. Background**

- 3.1 The current Local Plan – the Guildford Borough Local Plan 2003 – was adopted in January 2003. Policies from the 2003 Local Plan were saved for development management purposes pursuant to the transitional provisions set out in the Planning and Compulsory Purchase Act 2004 (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 new Local Plan, subtitled as 'delivering development' will provide policies that relate to development management matters. The two constituent development plan documents of the new Local Plan – 'strategy and sites' and 'development management' – will, once adopted, supersede all of the saved 2003 policies.
- 3.2 The policies of the draft Local Plan have been prepared to accord with the National Planning Policy Framework (NPPF), Planning Policy for Traveller Sites (PPTS) and the Localism Act 2011 (including the Duty to Cooperate). In preparing the draft Local Plan, officers have also had regard to requirements of the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning Regulations (Local Planning) (England) Regulations 2012. The National Planning Practice Guidance (NPPG) has also been used as a guide throughout the plan-making process.
- 3.3 There are significant challenges in preparing a new Local Plan and the statutory process is complex and lengthy. It will also require some difficult decisions and choices; however, preparing a new Local Plan that is capable of being found sound will enable us to plan positively for our future and ensure that the borough remains successful and vibrant.

- 3.4 It is also important that we maintain progress on the Local Plan. This will ensure a greater level of certainty for service providers, residents and developers. Any significant delays would also lead to a greater risk of Government intervention should the recommendations of the Local Plans Expert Group be accepted and implemented by Government.
- 3.5 Whilst maintaining good progress it is imperative that we prepare a plan that is capable of being found sound at examination by an independent planning inspector. We will also need to demonstrate that we have met our legal Duty to Cooperate. This requires that we have engaged constructively, actively and on an ongoing basis with our neighbours and a set of prescribed bodies on cross boundary strategic matters. Should we fail this legal test, it cannot be rectified through the examination process. The plan would therefore be found unsound and we would need to restart the local plan process.

#### **4. Changes to the Draft Plan**

##### **Reponses received**

- 4.1 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 on the Draft Guildford Borough Local Plan: strategy and sites (2014) undertaken under regulation 18 of the 2012 Regulations. In July 2014, the Council undertook a twelve week public consultation on the Draft Guildford Borough 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 Local Plan. A Summary of Key Themes from the consultation was published in December 2014.
- 4.2 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**

- 4.3 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 (LAA)
- Level 1 Strategic Flood Risk Assessment
- Guildford Borough Local Plan Strategic Transport Assessment

4.4 In addition to the above one piece 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 GB purposes, yellow meant it scored 2/4 and red meant it scored 3/4 or 4/4. Alongside the detailed considerations carried out as part of the Sustainability Appraisal process, the sensitivity map has been used as a further targeted constraint in arriving at the amended proposal sites as described below.

4.5 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 in the NPPF, within the lifetime of the Local Plan can be included as proposal sites.

#### **Alteration to the spatial strategy**

4.6 The new set of documents produced to identify OAN in relation to housing, employment and retail and leisure were all published on 2 October 2015. The housing document, the SHMA was produced jointly with Waverley and Woking as the three boroughs are considered to constitute a 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 housing need is 693 dwellings per annum.

4.7 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 to which we would wish to direct growth. This hierarchy remains the most sustainable options for growth and will therefore remain the hierarchy. It is important to note that whilst we will seek to maximise development opportunities as we move down the hierarchy, there will be a point within each option when the harm associated with providing additional development would significantly and demonstrably outweigh the benefits of providing more homes within this type of location. This can be due to the impact that it might have on character or the ability of the supporting infrastructure to cope with additional growth. At this point, it is considered to be more sustainable to move to the next spatial option within

the hierarchy and assess the contribution that it can make to meeting our development needs.

4.8 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

4.9 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
- Urban extensions
- New settlement at the former Wisley airfield
- Development around villages

4.10 A considerable level of the feedback we received as part of the last consultation referred to insufficient consideration being given to the harm associated with development and the need for a more stringent application of constraints, particularly with regard to the Green Belt and landscape. 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.

4.11 The draft Local Plan (2014) already places great weight in seeking to protect the Area of Outstanding Natural Beauty (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.

4.12 In considering different sites within these spatial options, we have relied upon the findings of the GBCS. The GBCS identifies Potential Development Areas (PDAs) that could potentially be removed from the Green Belt for development, without harming the main purposes of the Green Belt. The draft Local Plan (2014) treated all PDAs as reasonable options for development. However, following the feedback from consultation and the new evidence available, we have reconsidered how Green Belt is used as a constraint. The draft Local Plan seeks to give weight to the sensitivity of the Green Belt parcel within which each PDA is located. Whilst PDAs have been identified on the basis that they would not fundamentally harm the main purposes of the Green Belt, there would nevertheless be, in relative terms, more harm caused by allocating sites within land parcels assessed as contributing more towards the purposes of the Green Belt.

- 4.13 We therefore consider the following spatial strategy represents a more sustainable approach than the previous draft and 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.
- 4.14 The first set of four spatial options remain unchanged – we will still seek to maximise appropriate opportunities for development in these locations. In terms of the second four options, these are discussed below.

#### Countryside beyond the Green Belt

- 4.15 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 to extend Green Belt land in this area. We consider that whilst this strategy seeks to maximise growth in this sustainable location, it responds to the fact that development here is being delivered in a piecemeal way without the other mix of uses and supporting infrastructure that sites of this scale would normally deliver.

#### Guildford urban extensions

- 4.16 Around Guildford, our most sustainable settlement, we will apply the Green Belt sensitivity scoring and exclude any sites that fall within a red (high sensitivity) land parcel. There are no green (low sensitivity) sites and the main yellow (medium sensitivity) sites that remain are both able to benefit from, and facilitate, a greater level of supporting infrastructure.

#### New settlement at the former Wisley airfield

- 4.17 This site is located in a yellow land parcel. Given the partly brownfield element, the sustainability merits of strategic sites due to the infrastructure that can be provided alongside them, the extent to which it can help deliver the homes needed and the NPPF support given to this development option, this site would also remain in the plan.

#### Development around villages

- 4.18 This option can be a sustainable option so long as careful consideration is given to the choice of location where it can enhance or maintain the vitality of rural communities. In accordance with the NPPF we should direct development to villages which can be made more sustainable through additional growth. This option is however lower in the hierarchy than the strategic sites, and for that reason we consider that in order to maintain the integrity of the Green Belt, growth should be limited to those sites that are located in green (low sensitivity) land parcels only, unless other sustainability considerations warrant making an exception to this. This rationale results in the following sites around villages:
- East Horsley and West Horsley (north) – four sites are identified here. The sites are located in a green (low sensitivity) land parcel. East Horsley is defined as a Rural Service Centre and is therefore the focus for growth in the rural areas. This is due to the level of services and facilities available in the village. West Horsley (north) physically adjoins East Horsley and can therefore be considered as comparable in terms of its relative sustainability. The sites are all within close proximity to the district retail and service centre and train station.

- Flexford – one small site is identified here in a green land parcel. The site is within easy access to Wanborough train station as well as the new services and facilities planned for the proposed new strategic site between Normandy and Flexford.
- Send – one small site is identified here in a green land parcel. The site is partly owned by the Council and we are seeking to deliver a proportion of traveller accommodation to meet the borough-wide need. Provision of pitches on the edge of one of our more sustainable villages will help ensure better integration of our travelling and settled community, with good access to facilities such as school and health care.

#### Exceptions

4.19 As set out above, whilst the Green Belt sensitivity methodology is applicable as a general principle, consideration must be given to wider sustainability factors. The following sites are identified in the plan:

- Send Marsh /Burnt Common and Ripley – this site is located in a yellow (medium) sensitivity land parcel and has capacity for 7,000 sqm of industrial land and 400 homes. Our Employment Land Needs Assessment (ELNA) identifies a need for industrial land. This site is identified in the GBCS (Volume V) and is available and suitable to accommodate this use. In addition to this benefit, the landowners are willing to provide land to facilitate a new northbound on slip and southbound off slip onto the A3.
- A3 at Send Marsh /Burnt Common – these sites are located in yellow and red (medium and high) sensitivity land parcels and will deliver a new northbound on slip and southbound off slip onto the A3. These new junctions are able to deliver significant benefits to the local road network and are necessary in order to deliver the scale and distribution of planned growth within this area.
- Normandy and Flexford – this site is located in a red (high) sensitivity land parcel. The key factors that have determined the site allocation at Normandy are:
  - Green Belt – site identified in the GBCS as a potential development area with defensible boundaries
  - Site is promoted for mixed use development, is deliverable and viable
  - The location is one that would benefit from additional housing. Both Normandy and Flexford have lost local facilities such as shops and a public house because there are insufficient populations to support them.
  - Infrastructure
    - The site will deliver a local centre with community and retail facilities, and a village green
    - Provision of specialist accommodation (care home and Travelling Showpeople plots)
    - Provision of a secondary school to meet future needs of the west area of Guildford borough (both natural population growth and need arising from the planned new housing)

- Proximity to the existing rail station and plans to improve the frequency of the service. This would serve both Normandy and Flexford residents and be used by pupils accessing the secondary school
- Capacity of the site is able to accommodate the level of associated infrastructure
- Educational need arising from our spatial strategy for the west of the borough (up to 8 forms of entry). This is principally development at Ash/Tongham, Blackwell Farm, west Guildford town and the Normandy site itself (1 form of entry)
- The secondary school is located in an easily accessible location to both Ash/Tongham and Guildford – it is therefore best able to serve the catchment area
- Such a development could make both Normandy and Flexford villages more sustainable

#### Traveller accommodation

4.20 We are required to meet the needs of all groups in our community and this includes travellers. 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, some of these are located in red land parcels.

## **5 Infrastructure**

5.1 The Council and infrastructure delivery partners have considered what infrastructure will be needed to support the housing, employment and retail development planned. 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 the opportunity to secure supporting infrastructure, and their site allocations include the social infrastructure they will need to ensure these communities are sustainable and do not place further pressure on 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

5.2 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 draft Local Plan. This programme includes:

- New rail stations at Guildford West (Park Barn) and Guildford East (Marrow)
- 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 several early, targeted improvement schemes to deliver road safety and some congestion relief on the A3 Guildford in the first ten years of the plan period.

- 5.3 The schemes that we consider are necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the plan. It should be noted that the delivery of the scale of development contained within the draft 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.
- 5.4 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 are appropriate to promote at this time, was 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.
- 5.5 A new Strategic Transport Assessment is currently being prepared by Surrey County Council and will be provided to Guildford Borough Council by the end of 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 draft Local Plan, and secondly, it will assess the mitigation provided by the programme of transport schemes described above. These points are elaborated below.
- 5.6 The previous strategic transport assessments, as published on the Council's website, considered a range of growth scenarios representing different scales 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.

- 5.7 However, the quantum of planned growth in the borough as set out the spatial strategy for the draft 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'.
- 5.8 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.
- 5.9 In contrast, the new strategic transport assessment will forecast 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 forecast 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.
- 5.10 The headline results of the Strategic Transport Assessment will be made available to the Full Council on the Order Paper and the Surrey County Council full report will be published as part of the evidence base for public consultation.

## **6 Policies**

- 6.1 The Draft Plan remains primarily a strategic document that allocates sites to meet OAN. The policies are grouped under headings of Housing, Protecting, Economy, Design, Infrastructure and delivery, 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.
- 6.2 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.
- 6.3 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.
- 6.4 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.

## **7 Site Allocations**

- 7.1 The strategic sites contained within the draft Local Plan (2014) are all retained within the draft Local Plan. The site area has been increased at Wisley and Gosden Hill but the site allocation capacity has not been increased. 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 terms of both Green Belt and AONB. In addition, a new strategic site has been created at Normandy and Flexford, as detailed earlier in this briefing note, having previously been safeguarded for future development. Given the range of benefits associated with this site, we consider that it should be brought forward for development within this plan period.
- 7.2 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 (south). A number of sites have been removed from the plan within the town centre in light of applying flooding constraints.
- 7.3 Additional retail proposals remain focused within the town centre of Guildford. Some local facilities will be provided in the new strategic sites including both retail and employment uses. 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.
- 7.4 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 permissions.

## **8 Consultations**

- 8.1 The draft Local Plan has evolved from the Council's Issues and Options Paper and Draft Local Plan. Both of these documents were the subject of extensive public consultations (in 2013 and 2014 respectively). If the Council permit the publication of the draft Local Plan, the document will also undergo a six week public consultation period.
- 8.2 In producing the draft Local Plan, officers have undertaken a series of ward member briefings. These meetings have facilitated discussion between officers and members regarding the strategic approach to development adopted in the draft Local Plan and ward specific matters.
- 8.3 Key issues relevant to the draft Local Plan have also been discussed by officers and members in regular Local Plan Panel meetings.
- 8.4 The document has also been considered by the Borough, Economy and Infrastructure Executive Advisory Board whose comments are contained in the next section of this report.

- 8.5 The document was also considered by the Executive on 11 May 2016. It was recommended to Full Council that the document be published for formal consultation, see section 10 below.

## **9 Borough, Economy and Infrastructure Executive Advisory Board comments**

*To review the naming of particular ‘pockets of deprivation’, as currently used to describe some wards.*

- 9.1 The draft Local Plan no longer specifically identifies the two least advantaged wards.

*To support the proposal to monitor the effect of future planning applications on local communities, in particular the increase in the number of Houses in Multiple Occupation (HMO’s).*

- 9.2 A new monitoring indicator has now been added after Policy H1, to monitor large Houses in Multiple Occupation (HMOs).

*To consider the Board’s overwhelming concern about the lack of adequate infrastructure to support planned development particularly in its rural areas. Sufficient infrastructure should be delivered when needed to support the cumulative impact of development in the future, in particular for sites that are too small to provide their own infrastructure directly themselves, but which cumulatively would have an impact.*

*To give assurance and guarantee that infrastructure improvements would be delivered in time to support planned growth.*

- 9.3 We recognise that planned development, both the strategic sites and the cumulative impact of smaller sites, will place extra pressure on existing infrastructure and will require the provision of new or improved infrastructure.

- 9.4 The Infrastructure Delivery Plan (IDP) and the Infrastructure Schedule at Appendix C of the draft Local Plan set out the key infrastructure needed to support the planned development. The IDP will be updated as further detail on supporting infrastructure is available. Developer contributions (including the “pooled” Community Infrastructure Levy) and other funding sources will be used to ensure that key infrastructure is delivered and available when it is needed.

- 9.5 The Department of Transport’s Road Investment Strategy (RIS) (March 2015) sets the programme that Highways England is expected to deliver.

- 9.6 This programme includes the following schemes which we consider are necessary for the delivery of the draft Local Plan:

Schemes with construction anticipated to commence in Road Period 1 (2015/16 to 2019/20):

- M25 Junctions 10-16 – upgrading the M25 between junction 10 (A3) and junction 16 (M40) through a mixture of enhancements, including hard

shoulder running between junctions 15 and 16, as well as four-lane through-junction running between junctions 10 and 12.

- M25 Junction 10/A3 Wisley interchange – improvement of the Wisley interchange to allow free-flowing movement in all directions, together with improvements to the neighbouring Painshill interchange on the A3 to improve safety and congestion across the two sites.

Schemes with construction anticipated to commence in Road Period 2 (2020/21 to 2024/25):

- A3 Guildford – improving the A3 in Guildford from the A320 to the Hogs Back junction with the A31, with associated safety improvements.

- 9.7 As schemes that we consider are necessary for the delivery of the draft Local Plan, these schemes are written into the plan itself in the Infrastructure Schedule at Appendix C. As stated in paragraph 4.6.16 of the draft Local Plan:

*'The implementation of the three RIS schemes during the Plan period, alongside other critical infrastructure, is required in order to be able to accommodate future planned growth both outside and within the borough.'*

- 9.8 If, following the adoption of the new Local Plan – which we are proposing should specify that these RIS schemes are necessary – one or more of these schemes were not to proceed to construction, were to be delayed, or were to be modified such that their impacts (as anticipated in the draft Local Plan) in improving capacity and safety were to be significantly diminished detailed planning permission would be unlikely to be granted. If the delivery of housing on sites identified in the plan were significantly constrained through the absence of necessary infrastructure then this is likely to trigger a review of the plan to consider alternative options to meet housing delivery targets.

- 9.9 In addition, the development of the strategic sites at Blackwell Farm, SARP and Gosden Hill Farm would be expected to deliver various transport infrastructure schemes as requirements during the first ten years of the plan period. This is prior to the realisation of congestion and safety outputs of the A3 Guildford RIS scheme, which we are assuming will be constructed between 2023 and 2027. These schemes include:

- The new access road from the A31 Farnham Road to the Egerton Road area, via the Blackwell Farm development, which will provide some relief to the A31 Hog's Back/A3 junction
- The new A3/A3100 Burpham junction with relocated A3 southbound off-slip and new A3 southbound on-slip, which will provide some relief to the A3/A322/A25 Dennis interchange to the east as some local traffic heading from or to the east of Guildford will, in future, access the A3 at the new A3/A3100 Burpham junction
- The new rail station at Guildford East (Merrow), immediately serving the Gosden Hill Farm development

- The Gosden Hill Farm Park and Ride
- Sections of the Sustainable Movement Corridor serving all three urban extensions with other key destinations in Guildford itself.

9.10 Pending confirmation in the forthcoming Strategic Transport Assessment, we consider that these will provide congestion relief to the A3 trunk road and its junctions sufficient to accommodate within acceptable limits the vehicular trips generated by the new homes and other uses built on these sites in the period to 2027.

*To consider reviewing the methodology employed in the Green Belt and Countryside Study, specifically in relation to deciding between, low, medium and high sensitivity areas. This would ensure that it was defensible when examined by the Secretary of State.*

9.11 The Green Belt and Countryside Study (GBCS) split the borough into distinct land parcels. These were identified on the basis that they are physically and visually contained, and surrounded by defensible boundaries. Volume II assessed each land parcel according to the four main Green Belt purposes.

9.12 In early 2014, we undertook a review of the methodology as part of a wider Joint Scrutiny Committee review of the evidence base. Comments submitted by the public together with consideration of other recent Green Belt reviews led us to redefine the way in which two of the purposes were assessed. This resulted in an update to the land parcel scoring and the production of the Green Belt sensitivity map (Volume II addendum).

9.13 We therefore consider that there has been sufficient scrutiny of the methodology used and the current scoring represents a robust assessment of the relative strength of different land parcels against the purposes of the Green Belt. However, as set out earlier in this report, it is important to note that whilst Green Belt sensitivity has been used as a general principle, it is one of many factors that we have considered in developing our spatial strategy.

*To support the strongest worded affordable housing policy we can have within the remit of sustainable development.*

9.14 We consider that policies H2 and H3 in the Draft Local Plan will help deliver a significant level of affordable housing across the borough to meet the identified high need. We estimate that this would deliver in excess of 5,000 new affordable homes. Work that has been undertaken in relation to development viability supports the view that the level of affordable housing sought by policy can be delivered.

*To safeguard green spaces and green approaches in Guildford Town and its surrounding countryside so to enhance the quality of life for all.*

9.15 In comparison to the draft Local Plan (2014), the draft Local Plan includes an increased consideration and protection of green approaches towards settlements

and open space within settlements. This is evidenced with the three main strategic sites:

- Blackwell Farm: this site allocation has been reduced and no longer includes the southern land parcel, which was assessed as being highly sensitive Green Belt and partly within AONB/Area of Great Landscape Value (AGLV). Whilst the existing access road (Down Place) will need to be widened in order to deliver this quantum of housing, the impact of doing so is considerably less than before. The previously proposed access road involved a new junction off the A31 with a design that would have been much more prominent on the landscape.
- Gosden Hill: the site has been expanded slightly towards the north in order to accommodate and deliver the necessary secondary school however the policy requires that, to ensure that sufficient separation is maintained between the site and Send Marsh, part of the extension adjacent to the A3, will need to remain open as a green buffer.
- Wisley: due to the location of the SANG to the north and the surrounding vegetation, the site is visually screened from the A3. Only a small part of the site abuts the A3 and will be served by the access road.

9.16 It can also be evidenced through new and expanded policies that have been included in the draft Local Plan:

- Policy D1: this policy requires that developments respond to the characteristics of the site. Further wording has now been added since the EAB meeting to the Reasoned Justification to further emphasise that careful consideration is required to ensure that there is an appropriate transition between urban and rural character with the green approaches to settlements being respected.
- Policy D4: this is a new policy which seeks to secure high quality development within urban areas and inset villages. It requires that new development is designed to relate positively to its context and surroundings. It goes on to list specific considerations for development in inset villages and the need to have regard to the important relationship between built development and the surrounding landscape.
- Policy I4: this policy includes a new Open Space designation which will protect open space of public value. We have identified Open Space that has public value for sports, recreation and amenity in urban areas and inset villages.

*To review whether a higher windfall assumption is justified.*

9.17 We estimate that there is potential for 625 homes to be delivered on small sites of less than five homes over the plan period. This is based on an assessment of past trends and excludes residential gardens, as required by the NPPF. We have reviewed our assumptions and considered additional information that has been submitted to us. However, we do not consider that any increase in windfall is justified and are confident that our methodology is robust and likely to be considered sound at examination.

## **10 Executive**

- 10.1 The Executive considered the draft Local Plan on 11 May 2016, together with supplementary information in relation to an amendment to the draft Local Plan proposing to remove site allocation policy A43 Land around Burnt Common warehouse, Send and replace it with a new site to the east of Burnt Common Lane, south of Portsmouth Road, and north of the A3.
- 10.2 A further allocation is made on the land to the south of the site either side of the A3. The proposal is to facilitate provision for a northbound on and a southbound off slip road onto the A3 from the A247.
- 10.3 The Executive accepted this amendment and recommended to Full Council that the document, as amended, be published for formal consultation.

## **11. Equality and Diversity Implications**

- 11.1 All public authorities are required by the Equalities Act 2010 to specifically consider the likely impact of their policy, procedure or practice on certain groups in the society.
- 11.2 It is our responsibility to ensure that our policies, procedures and service delivery do not discriminate, including indirectly, on any sector of society. Council policies, procedures and service delivery may have differential impacts on certain groups with protected characteristics, and these will be highlighted in the Equalities Impact Assessment (EqIA) screening. Likely differential impacts must be highlighted, and described, as some may be positive. Where likely significant adverse differential impacts are identified, consideration should be given to opportunities to reduce or mitigate this through a full equalities impact assessment.
- 11.3 An EqIA screening was carried out for the Draft Local Plan (July 2014). This document has been reviewed in light of the further changes to the Local Plan. It is not considered necessary to carry out a full EqIA.

## **12. Financial Implications**

- 12.1 Since 2009, the Council has spent £1.9 million on developing the draft Local Plan. There is a budget of £425,300 for 2016/17 to ensure that the Local Plan continues to develop in line with the timetable in the Local Development Scheme. We estimate a budget of £399,000 for 2017/18 to support the Development Management Policy Document that will underpin the Local Plan.

## **13. Legal Implications**

- 13.1 After submission to the Secretary of State, the draft Local Plan will be examined by an independent planning inspector. The inspector will consider whether we have fulfilled our legal Duty to Cooperate and whether the plan meets the tests of soundness set out in paragraph 182 of the NPPF. There are various potential risks to the plan being found sound, and it may be vulnerable to a legal challenge

by way of judicial review on grounds such as procedural defect or flaw, or failure to take into account any relevant material consideration. In either case, it is essential that we can show that we have observed the procedural steps and requirements set out in the relevant regulations. These include not only the Town and Country Planning (Local Planning) (England) Regulations 2012, but also the Environmental Assessment of Plans and Programme Regulations 2004 and possibly also the Conservation of Habitats and Species Regulations 2010 (as amended).

- 13.2 We will need to show that we have observed the current NPPF and the newer NPPG, as well as creating and maintaining an up to date and proportionate evidence base to inform its policy decisions. The evidence base includes the documents that show objectively assessed need within the borough. The NPPF makes it clear that one of the Government's objectives is to boost significantly the supply of housing. Without a housing target that the Planning Inspector considers satisfactory, it is unlikely that the draft Local Plan would be found sound.
- 13.3 The failure to adopt a new local plan and the reliance on an out of date plan makes the borough council less able to focus development in areas that meet wider strategic objectives. Furthermore the Government has announced that where Local Plan progress is not considered acceptable the SoS for CLG may intervene.
- 13.4 The Town and Country Planning Act places a duty on local planning authorities to produce and adopt a Local Plan. The Plan will ultimately replace the current Borough Local Plan adopted in 2003.

#### **14. Human Resource Implications**

- 14.1 Consultants have been procured to assist with the consultation process. The process will include a relatively small amount of weekend and evening work for members of the team. Following consultation there will be a process of recording and evaluation the responses received. In past consultations this has involved employing additional temporary staff to help with the administration involved in processing 20,000 representations. This is likely to be the case again.

#### **15. Conclusion**

- 15.1 Using consultation comments received from the Draft Local Plan, emerging evidence, and national policy and guidance, officers have produced the draft Local Plan: strategy and sites. The document is considered to meet the test of soundness of the NPPF, provide a strong overarching framework for development in the borough up to 2033 and reflect local circumstances. Publishing the draft Local Plan for public consultation is a key stage of the Local Plan making process and will enable the Local Plan to progress towards full adoption.

## **16. Background Papers**

- 16.1 The Council's Issues and Options document can be accessed via the Council's website: [www.guildford.gov.uk/article/3976/Issues-and-Options](http://www.guildford.gov.uk/article/3976/Issues-and-Options)
- 16.2 The Draft Local Plan can also be accessed from the Council's website via the Council's website: [www.guildford.gov.uk/draftlocalplan](http://www.guildford.gov.uk/draftlocalplan)
- 16.3 Officers are currently in the process of producing topic papers which appraise the approach adopted in each policy of the draft Local Plan. These documents are currently unavailable to view but will be available for the start of the consultation period.
- 16.4 All evidence base documents are available to view at [www.guildford.gov.uk/researchandevidence](http://www.guildford.gov.uk/researchandevidence)

## **17. Appendices**

- Appendix 1: Table of Main Changes since Local Plan version published for Executive
- Appendix 2: The draft Local Plan
- Appendix 3: The Consultation Statement
- Appendix 4: Draft Land Availability Assessment
- Appendix 5: Draft Sustainability Appraisal
- Appendix 6: Draft Habitat Regulations Assessment
- Appendix 7: Statement of Representations
- Appendix 8: Draft Infrastructure Delivery Plan