

## **Question 1: The evidence base and submission documents**

### **The Guildford Society remains seriously concerned about the robustness and accuracy of the Strategic Housing Market Assessment.**

An independent review commissioned by the Guildford Residents' Associations has uncovered flaws in both the principal modelling and the application of the numbers in reaching the consultant's recommendations.

Despite representations prior to and as part of the 2014 consultation, the Settlements Profiles Report falls a long way short of the necessary standard – it is still full of errors and fails to take any sensible account of the 50% or so of the Borough which lies in the Guildford Urban Area.

There is considerably more traffic data sitting behind this draft. It was unfortunate that this was delivered so late, leaving insufficient time to review it fully. The initial studies of it show there to be several fundamental and yet unexplained assumptions about future traffic use. The detail provided so far in relation to the Sustainable Movement Corridor is not sufficient to support or reinforce the wider traffic assumptions for the town centre, local road network and strategic road network.

The Society still has reservations about the approach to land parcelling and consequent findings arising from the Green Belt and Countryside Report. We recognise there is a need to plan to use some Green Belt land to achieve the Plan Objectives (which are in part predicated by the flawed SHMA).

More detail about our concerns about the Evidence Base are in our original submission of 2014 and, where additional emphasis is required, in the submission in response to this Regulation 19 Consultation.

## Question 2: Legal Compliance

**The Guildford Society recognises that Guildford Borough Council has taken legal advice in preparing the Local Plan, whereas we and other charitable bodies do not have access to such advice.**

The Society expects there to be a legal challenge from some groups in the Borough who object to the removal of land from the Green Belt.

Whilst we regret the need to remove some areas from the Green Belt, we have taken the view in our previous submissions and in our submission in response to this Regulation 19 Consultation, that we will support the notion (noting our concerns about the reliability of the SHMA) that we will need to use some Green Belt land in this plan period to meet our housing need and to allow the time to properly regenerate our urban brownfield sites.

We do not propose to comment on legal compliance for itself, but rather to make the judgement that IF the plan is legally compliant, we wish to ensure it is the best it can be.

## Question 3: Soundness

**The Guildford Society questions the soundness of the Draft Plan on several grounds, not the least of which are: the shortcomings of the SHMA, the Green Belt report, and the highways assumptions.**

The Society condemns the failure to provide for a new link between the west of Guildford which will be expanded substantially under the planned site allocations (in the region of 10,000 homes plus the growing university, the hospital, the expanding research park and other centres of employment by the end of the Local Plan period).

Of greater importance is the notion that the plan does not adequately provide for development beyond the plan period. The Society's full submission highlights the restrictive nature of the Borough and illustrates the likely future pressures to sprawl along a narrow corridor of the Borough as we have to plan for future pressures to grow.

## Question 4: Duty to cooperate

**The Guildford Society** is concerned that the Duty to Co-operate has not been shown to be applied evenhandedly.

The impact of developments beyond the boundaries of Guildford Borough have not been fully assessed for impact on Guildford's infrastructure, and, in providing for an inflated Objective Assessment of Need number in full (GL Hearn's target), it is likely Guildford will have to take additional development from our neighbours who we expect to restrict their development by applying greater emphasis to maintaining Green Belt boundaries.

## Question 5: Examination

The Guildford Society has

- engaged positively in the Local Plan process from the outset,
- held public meetings (free of charge) to explain elements of the evidence base, plan and process so as to ensure as objective as possible an approach to responding to the Local Plan consultations.
- requested and obtained acceptance from the Director General of the Office for National Statistics that the population projections contained anomalies arising from the (important) transient student intakes in Guildford,
- provided a contribution of some funds to help GRA commission an expert to review the SHMA, and
- drawn on the knowledge of our four knowledge groups, planning, transport, design & heritage and local economy – all of which includes respected experts – to inform its contributions.

The Society would like to participate in all matters at the inquiry. We reserve our position in respect of independent experts we would wish to accompany us be accompanied by an expert witness for the SHMA and for transport- related in respect of specialist matters.

## **Question 6: The content of the plan**

**The Guildford Society's response to this question is to be found in its separate submission document, and by reference to our previous responses to the 2014 Consultation and specific components of the Evidence Base.**

The reference to needing to have infrastructure in place or committed before granting planning consents is welcome but we are deeply concerned about its operation in practice. We have commented on this in our full response.

## Question 7: Any other comments?

Where possible, the Guildford Society wishes to support Guildford Borough Council's attempts to adopt a new, sound, progressive and regenerative Local Plan.

We do not agree with some fundamental points – noted herein and in our full submission – and we are concerned that misguided public relations stunts such as the publicly-funded video may skew responses or underpin objectors' scepticism so as to make the Local Plan process more challenging.

**NOTE: This questionnaire response is supplementary to the Guildford Society response to the Regulation 19 Consultation.**

**Where there is any discrepancy between the two documents, the response document supersedes the questionnaire response**