

30th March 2018

The Great Guildford Gamble



Guildford Borough Council, through their draft Local Plan, are engaged in an enormous and potentially damaging gamble with Guildford's future.

They are wagering that they can persuade the Planning Inspectorate and developers to hold off any development whilst the infrastructure is not in place, but the Evidence Base is so poorly put together that this defence is like holding up cardboard shields when the enemy has machine guns. It is probably about as much use as a chocolate teapot.

A major contributory factor to this gamble is the decision by the Leadership (following on from former councillors Mansbridge and Juneja) to park the master-planning of the town centre until the Local Plan is adopted. Why? Because they are likely to change some uses in the town centre from their designated Local Plan uses into residential uses, and to openly state this might just undermine the Local Plan process.

The failure to look at key town-centre brown-field sites is a major source of criticism from the Planning Inspector in his first response to the submission draft Local Plan. This, coupled with an incoherent affordable housing strategy that is already shown (by recent and live planning applications) to be a long way wide of the mark, amounts to a massive failure to deliver on the Government's and the Inspector's perceived structural failings in Guildford and similar areas.

The article that follows does not try to pretend that the Lead Councillors and officers are not working incredibly hard – they are. But it highlights what the author sees as the major challenges ahead as we enter the Examination in Public of the Local Plan.

Council in massive gamble over Guildford's future

Julian Lyon 30th March 2018

In response Guildford Borough Council's 2017 (Regulation 19) Consultation on its submission draft Local Plan, the Guildford Society wrote: "***We are concerned about the nature of the gamble being undertaken to make all or most development 'contingent' upon infrastructure, much of which is beyond the power and control of the Council to bring forward.***"

The Planning Inspector for the Examination in Public of Guildford's Local Plan (Jonathan Bore) said: "***I am very concerned about the proposed stepped housing trajectory which indicates that the plan will***

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deliver much lower numbers of homes in its early years than are actually needed. This appears to be an unacceptable aspect of the plan and the Council needs to consider the steps that should be taken to improve housing delivery in the earlier years of the plan."

But actually, a fundamental problem with the Council's Local Plan process is that it is as if the Council's Leadership is playing Russian Roulette with Guildford and the planning and development of our town and Borough.



Many observers have pointed out, over the course of the consultations, that the Evidence Base is inadequate. Much of it remains unaltered to any serious degree throughout the five years since the original Issues and Options Consultation in 2013.

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In every single response to consultation, the Guildford Society has pointed to the hopelessly error-strewn and unsuitable 'Settlement Profiles Report'. This should have given enough of a flavour of each of the settlements in Guildford, their issues, threats, opportunities, concerns, micro-economies, relative deprivation, infrastructure, connectivity and characteristics. The profiles should have been the basis on which a decision as to whether to inset from the Green Belt or not, or where to provide for additional housing, schools, public transport, etc., should be made.

The Settlement Profiles Report was produced by the Council and not by any third-party consultant. It assumes a homogeneous mass of homes and communities in the Guildford Urban Area of around 77,000 people, with no distinction between Merrow and Stoughton, between the Town Centre and

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Park Barn.



The homogenous settlement of 'the Guildford Urban Area' as defined in the Settlement Profiles Report

The Inspector says: **“there is no indication of the numerical balance of housing development between different settlements.”** This is a critical issue because (a) it is indicative of a generic failure in the Plan to identify the relationship between constraint and the delivery of housing; and (b) because it fails to allow communities to plan positively.

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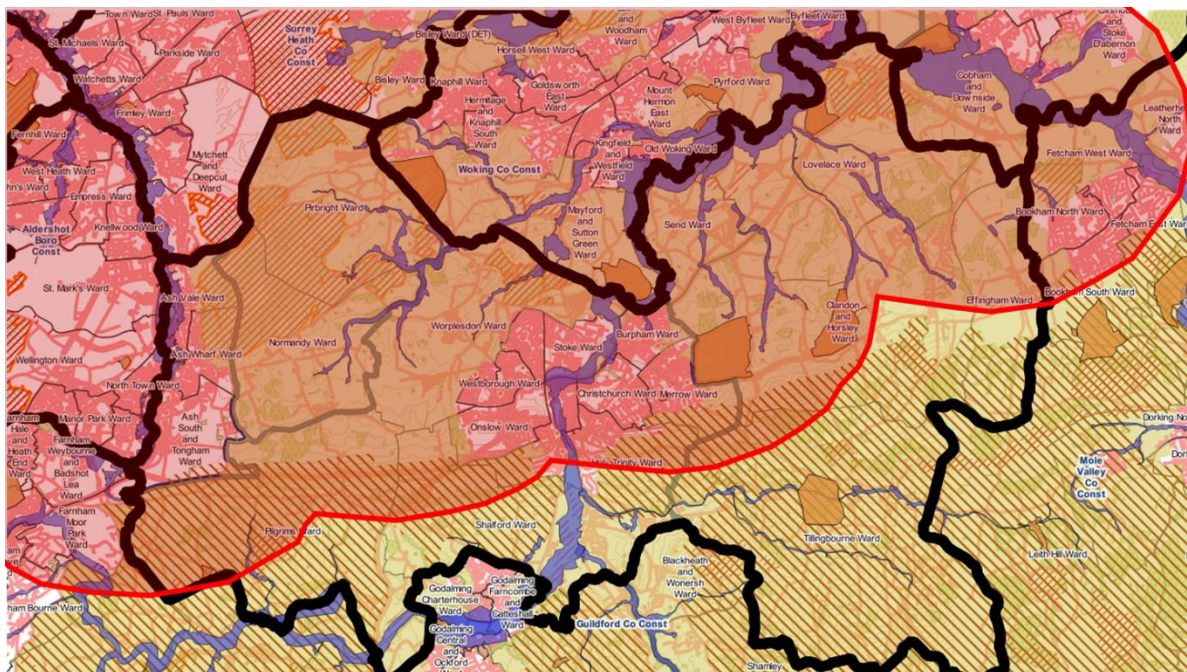
The Guildford Society, at its series of talks on the Local Plan, illustrated very clearly the importance of understanding each community and settlement for the purposes of allocating any land for development. The Society highlighted the Indices of Multiple Deprivation and their component parts to illustrate that some settlements (or discrete parts of the Guildford Urban Area) had very specific needs that were not tackled in the Local Plan.

The Council's approach to land use allocation (the purpose of this Local Plan) has not been robust enough, and it has failed to provide the basic tools for neighbourhood planning, where communities may want to take over the responsibility for positively planning their areas.

There is an interesting juxtaposition in Guildford Borough Council's approach to its plan. It has earmarked some very substantial amendments to the Green Belt boundary – removing some areas

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for development and adding some additional areas for protection. It has failed to make the case for ‘exceptional circumstances’ for either, and the Council’s Green Belt and Countryside Report has been shown to be inadequate as a basis for the draft policies incorporated into the Local Plan.



Guildford Borough Council's Constraints including the Area of Outstanding Natural Beauty, the Green Belt and the Thames Basin Heath Special Protection Area and associated exclusion and restriction

The Inspector says: ***“please can the Council provide me with a single paper setting out (a) a clear explanation of what it considers to be the strategic level exceptional circumstances justifying the release of the amount of Green Belt land indicated in the plan and its broad spatial distribution; (b) an explanation of what it considers to be the local level exceptional circumstances relating to each***

specific site from the Green Belt; and (c) an explanation of why it considers that there are exceptional circumstances that require the addition to the Green Belt between Ash Green Village and Ash and Tongham.”

Of course, 87% of the Borough is Green Belt and so this is a particularly important topic – and one where there has already been very close scrutiny. The entirety of Guildford Borough is restricted by an Area of Outstanding Natural Beauty, Green Belt or the SANG legislation policed by Natural England. It goes without saying that any Local Plan for Guildford must (a) make best use of available land suitable for development; and (b) ensure the best possible protection for the remainder of the Borough against inappropriate development.

Guildford’s Local Plan draft set out to suggest that all sites must automatically pay for Sustainable Alternative Natural Green Space (**SANGs**), policed by Natural England. The Inspector poured cold water on that suggestion. Natural England are merely a consultee and cannot drive planning policy.

The Guildford Society argued strongly that SANG payments were inappropriate for town centre developments – the SANG contribution for the SOLUM scheme at the Main Station would be £2.1m despite the availability of alternative green space for recreation and dog-walking within walking distance. The Society has estimated that there would have been 50% more affordable housing units if, on its merits, the scheme had been found to not need to contribute to SANGs.

The inexplicable policies for SANGs and the Community Infrastructure Levy (**CIL**) – set at £500 per

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square metre for Guildford’s new housing stock – contrive between them to make it unlikely that much affordable housing will be delivered at all in Guildford. For a one-bedroomed flat of, say, 60 square metres, there would be a combined CIL and SANG contribution (or tax) of £33,500. How will that make the market prices more competitive, and how will it deliver affordable homes (80% of market prices/rents)? Of planning applications and decisions for almost 1,000 units in most recent times (excluding the Guildford Park Car Park development), the average proposed provision of affordable homes – for reasons of lack of viability – is below 10%, and this before CIL has even been introduced. The Local Plan target is 40%.

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The Inspector was very clear about our priorities: ***“the level of identified affordable housing need is exceptionally high. I invite the Council to produce a paper to ascertain the degree of uplift that needs to be applied to the OAN starting point which can reasonably be expected to improve market housing affordability and deliver as many as possible affordable homes. This should be a “policy off” analysis.”***

The delivery of the sorts of numbers of homes targeted in the Local Plan (which will almost certainly increase following the Examination in Public) without making any serious contribution to affordable housing numbers would be at best incompetent and otherwise highly negligent.

Guildford Vision Group and the Guildford Society have each made strong representations about the absence for all practical purposes of the town centre, and of master-planning, and the failure to take proper account of the scope for brownfield urban land to deliver considerably more housing. The Inspector has agreed:

- ***“Guildford is a location with conflicting demand for limited space from different land uses, but it is demonstrably clear that the major need is for new housing, so it is not apparent why the plan seeks to protect all employment land, floorspace and hotels.”***
- ***“how many years has the redevelopment in North Street, Guildford been under consideration, how long has it had planning permission and has that permission been renewed? Against a background of changing retailing patterns with continued strong growth in internet retailing, what consideration has the Council given to re-evaluating the balance of uses in this location having regard to the need to accommodate additional homes?”***
- ***“Policies D1 and D4 are “planning lists” and fall short of encouraging good urban design. They need to have regard to the policy in the NPPF and the advice in the PPG. There is nothing about the masterplanning of large sites, how the public can engage in the overall masterplanning process, or how overall masterplans and the different components of the larger schemes are to be subject to design review – essential parts of the urban design process. These considerations need to go into a new policy that combines Policies D1 and D4 and the wording needs to be designed with advice from a masterplanner / urban designer. This is essential given the number of major housing and mixed use allocations in the plan.”***
- ***“Please can the Council produce a paper setting out what steps should be taken and policy***

“This is a strong signal from the Inspector that, not only would it have been reasonable to include the Town Centre Regeneration Strategy in the Local Plan as a material consideration, but that the Local Plan should now be amended to include a Town Centre Master Plan such as the Guildford Vision Group has prepared.”

revisions made to accommodate a greater amount of the housing growth in the town centre and on other eligible brownfield land including suitable employment land and hotels.”

Guildford Borough Council has chosen to park the town centre until after the Local Plan has been adopted. It has done this, it seems, because the Town Centre Regeneration Strategy does not entirely comply with the Local Plan. It conflicts with it.

When, in 2014, the intended plan submission date was by the end of 2015, it was reasonable to suggest that delaying the Local Plan for the sake of inclusion of the town centre was a pragmatic

approach – the reason for the delay being that the evidence base had not yet been assembled to support the main modifications the Council would have had to make to the Plan.

“Where the plan is particularly risky is in the presumption that we can defend our town and Borough from a position where we start out during the next five years or so without an identified Five-Year-Housing-Land-Supply”

The Local Plan is two years behind that early timetable. There should have been plenty of time to make suitable amendments to include the town centre in the Local Plan by the submission date of late 2017.

The Town Centre Vision and The Town Centre Regeneration Strategy seem to have their roots in a politically-motivated desire to make the Guildford Vision Group go away. By not including any of this in the Local Plan, the Guildford Vision Group has been prompted to work even harder and to hold Guildford Borough Council to account on the Town Centre.

The Town Centre Regeneration Strategy (for years 2020-2025 and well within the scope of the Local Plan) says of Woodbridge Meadows:

“The site is currently used by the industrial market and allocated as employment land in the draft Local Plan. However, the Council recognises the need for improvement and effective land use. At present, the options include retention of existing use with improved, intensified employment use to retain jobs within the town centre.

With many plots of land vacant or underused, the site has an opportunity for improvement and investment into existing use or residential use which could potentially accommodate circa 700 residential units and a park fronting the river that would create an attractive community space and flood mitigation.”

The wording itself is careful to not necessarily conflict with the Local Plan’s designation of the area for Employment uses, but the totals for housing development seem to include the 700 units suggested on this site.

The Inspector is clear in his assertion that more effort needs to go into identifying underperforming uses that should give way to developing more urban residential development: **“Should the plan not be encouraging housing to replace outdated hard-to-let commercial premises in Guildford town centre, and should the land use balance in the Employment Core policy be revisited? This is a key strategic issue given (a) the amount of Green Belt land that is proposed to be released; (b) the potential that a higher OAN will be identified and (c) the need to cater for unmet housing need in the HMA.”** (note: OAN is the Objective Assessment of Need, and HMA is the housing market area which includes Woking and Waverley).

This is a strong signal from the Inspector that, not only would it have been reasonable to include the Town Centre Regeneration Strategy in the Local Plan as a material consideration, but that the Local Plan should now be amended to include a Town Centre Master Plan such as the Guildford Vision Group has prepared.

But these and others are all ingredients of a half-baked plan.

“The protection” (against development if we don’t have the Local Plan in place) “that Councillors Spooner and Furniss love to parade like a sword of Damocles suspended above our heads is as much a protection as that afforded to the Emperor by his new clothes!”

Where the plan is particularly risky is in the presumption that we can defend our town and Borough from a position where we start out during the next five years or so without an identified Five-Year-Housing-Land-Supply (**5YHLS**). This is the measure which determines whether the Local Plan is sound and is working satisfactorily to deliver the numbers of homes identified in the Evidence Base.

The Inspector is likely to require a substantially larger housing target and the plan (as currently drafted) will probably have a 5YHLS deficit for the first eight to ten years.

As a result of this, the Local Plan will count for nothing. The protection that Councillors Spooner and Furniss love to parade like a sword of Damocles suspended above our heads is as much a protection as that afforded to the Emperor by his new clothes!

The Local Plan – if the Council cannot hold its line – will leave a planning free-for-all where, rather than there being more control from having a Local Plan in place, there could very well be less.

The Inspector has not highlighted anything that the community (through various bodies) had already told them.

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JDSL 30th March 2018