

## **Response to the Local Plan - Strategy and Sites Consultation**

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### **Question 1: Evidence base and submission documents**

#### **We object**

**Key parts of the evidence are still missing, flawed or based on withheld assumptions. The Strategic Housing Market Assessment overstates need, the Green Belt and Countryside Study uses a flawed approach, and the Transport Assessment is too late and incomplete to be relied upon to inform the Plan.**

**The Plan excludes the Town Centre Master Plan, which plays a pivotal role and fails to address the results of infrastructure difficulties, or use these and Greenbelt to constrain the level of development.**

#### **The Employment Land Needs Assessment**

#### **We object**

This document omits many important points that are to be addressed at a future stage. The information is, however, very relevant and necessary and without it the document is weak on evidence. The overview given does not assess the capacity of existing supply to accommodate future growth. The paper acknowledges that almost 9% of commercial premises are empty and this somewhat flies in the face of arguments to vastly increase the volume until the reasons are understood. Around 30% of businesses are considering leaving Guildford (congestion being cited as a reason). There are also issues with planning permissions being granted to convert office space to residential, whilst at the same time it is argued that more offices are needed? The contradictions appear to indicate that policies related to this need firming up and that the evidence is incomplete.

We disagree with 40% of land in the town centre being given over to retail as there is no evidence that Guildford will 'buck the national trend' in terms of declining high-street sales, as has been suggested by Cllr Furniss. Guildford urban area ranks no 1 in terms of being the most sustainable location in the borough and, as housing is a priority, there should be more than 1,172 residences in the town centre.

We object to Policy E4 (expansion of the Surrey Research Park into the Blackwell Farm) The existing Research Park has been built at a very low density (25% plot ratio), which is very low for an urban extension. The majority of existing buildings are 2 storeys giving a developed floor space plot ratio of only 12.5%.

The existing Research Park has acres of surface car parking, which provides it with the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing density of the neighbouring academic buildings on the university campus at Manor Park, which is five times higher.

Together with the existing expansion of 14% through existing consents and the opportunity to increase its density, the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university, without utilising additional land.

## **Infrastructure**

### **We object**

The infrastructure schedule makes reference to 'improvements' without saying what they are. It includes a junction at the Guildford end of the A31, and another junction at Tongham. No evidence or traffic modelling data is available to demonstrate whether these 'improvements' will indeed improve anything at all given the additional traffic that will be generated by the new developments included in the plan. The Highways Assessment indicates that, even with these 'improvements', the level of congestion on the A3, A31, the B3000 and A25 will leave these roads over capacity and congested.

Constraints should be applied to the housing need/number as a full application of the overinflated number will have a severe detrimental impact on our road network. Smaller housing estates may be more difficult financially, but they would have less impact on infrastructure and could be considered where infrastructure already exists. The borough has many acres of surface car parking which, if replaced by multi-storey versions, and combined with current Brownfield sites, would free up enough land to build housing where it is wanted and needed and not on valuable Green Belt. There would be no need to build high-rise style development in Guildford town, which we don't support, but we do believe that buildings of 6-10 storeys (with underground parking) would be in keeping in some urban areas (where

they don't impinge on important vistas). [Some existing buildings already reach 5-7 levels in height].

The traffic maps omit the area south of Guildford borough completely and the lack of detail about impact on the B3000, a strategic route, is highly questionable, particularly as there are no solutions in place to deal with the impact. We are particularly concerned that, after the main highways routes of M25, A25, and the A320, the B3000 will incur the greatest increase in flow as this road is already close to capacity, with tailbacks at peak times. The road is no longer fit for purpose and modelling shows that developments planned, and the introduction of a new westerly route through Blackwell Farm, will severely worsen the situation, whether major work takes place on the A3, or not.

## **The Highway Assessment**

### **We OBJECT**

The strategic highway assessment requires a great deal more work and hence we OBJECT to the inclusion of this as evidence.

The B3000 runs through Compton, a small village with many listed buildings, most of which are very close to the road. The road already carries in excess of 5 million vehicles a year with average flow rates exceeding most A roads. It is the only settlement area in the borough where pollution levels exceed EU regulations and it is close to capacity now, with tailbacks at peak times, which add to the pollution problem. [see legal section]

The study is highly misleading. It refers to a figure of zero additional traffic from scenario 3, which includes the traffic from the strategic sites, one of which is partly in Compton. The assessment does not make it clear that the modelling is extremely limited and only includes impact on developments within the immediate area. Blackwell Farm is excluded from Area 107 (part of Compton) as false boundaries have been set. We believe that the impact from the strategic sites will be far-reaching and will most certainly impact Compton and beyond. Each village needs to be able to see the impact that development will have.

The Highways Assessment concentrates on peak time traffic only and gives no indication of overall volume increases or traffic type using specific routes outside peak hours. Understanding of the overall increase is important, as there is a bridge on the B3000 between Artington and Compton, which has a width restriction and may also require a weight restriction as it needs replacing within the next 2 years and no funding has been set aside for this. Instead Network Rail, SCC, GBC and Waverley BC continue to battle over responsibility for, and scope of, the project.

It appears that traffic data has been collected at different times of the year and over varying time scales in order to provide averages. This method of data collection can underestimate measurements by at least 30%.

Furthermore, we have been told that the person responsible for ratifying traffic data at Surrey County Council (SCC) has been off sick for over a year and that, whilst the daily data boxes continue to collect data, that data has not been collected or analysed for 2015. The data put forward for Compton's B3000 was based on a 3-week period in January and, as this was not representative, we understand it was removed. That said, the year-on-year data is for different periods and different times, varying from a few weeks in winter to longer periods over many months. We would like a more robust approach to traffic data collation.

**The cumulative effect of the additional traffic generated by the developments in the proposed submission Local Plan will be to increase congestion, even with the proposed highway improvement schemes in place. More detailed analysis of the junctions and queuing is required. We question the conclusion that the developments would have *An acceptable impact on the capacity of the highway networks in terms of the policy test set in paragraph 32 of NPPF*. We do not believe that the impact on the B3000 will be acceptable, as it is already operating beyond capacity, and this situation will be made much worse following the mitigation proposed for the A3.**

The Highways Assessment is limited to 30 results. Roads have been omitted from the report and it is unclear whether findings for the B3000 (also referred to as The Street B3000) are in fact from the Street or the roundabout from which there is a feeder road to Godalming via Priorsfield Road.

The table comparing scenarios and the impact on traffic is difficult to decipher. Scenario 1 includes current planning permissions plus Waverley's strategic sites. This shows an increase of just 9 vehicles per hour at peak times on the B3000. The next scenario 2 is the same, but includes GBC's strategic sites. Given that there is a strategic site in Compton of 1,800 homes and another of 1,000 at Normandy, the expectation would be for the volume to be not only higher, but considerably higher. The result is however, ZERO. We understand that this is because the impact measured is only from the immediate area and, as Blackwell Farm has been removed from the village for modelling terms, this does not give a realistic result. The omission of the Town Centre Master Plan and its impact on the roads further diminishes the integrity of this Highways Assessment.

Even without the full impact being understood, it is clear from the scale of development on the west of Guildford (1,800 homes at Blackwell Farm, 1,000 homes at Normandy, 1,300 homes at Ash, 3,800 homes in the Aldershot urban area, 1,200

homes at Borden) that the increase in traffic on the B3000 and other main routes would be severe.

The Highways Assessment shows that as a result of the proposals put forward in this draft of the Local Plan the B3000 will suffer the highest increase in flow rates at peak times (after the M25, A320 and A25. It also reveals that traffic flows would increase if the A3 was widened, as the A3 would then attract more traffic via the B3000. Despite this, there are no solutions planned to mitigate the situation and we are therefore strongly objecting to the level of development and in particular strategic development at Blackwell Farm as outlined in the Local Plan.

The proposal to introduce a new route to Guildford town centre from the west via Blackwell Farm has been ill thought out. The volume of traffic that will use this new 'rat run' through the new development and the university campus/business park, has been underestimated. There will be problems for traffic wishing to exit the new development in both directions during peak hours - traffic is frequently queueing for miles along the A31, and the Tesco roundabout is one of the worst bottlenecks in Guildford. The knock-on effect on the Egerton Road/Gill Avenue junction would impede emergency vehicles getting to and from the hospital.

The 4-way junction on the A31 has no detail at all and the concern is that permission in principle will be given to the site in the hope that these problems are surmountable. If they are insurmountable, which we believe they are, then enormous amounts of Green Belt land within the setting of the Surrey Hills AONB will have been sacrificed for nothing. The 4-way junction, if it goes ahead, is likely to be huge and, due to its elevated position, will cause significant harm to the AONB in terms of landscape and light pollution.

The Highways Assessment has many limitations, not least being the absence of the Town Centre Master Plan, which includes potential road closure and re-routing. Compton is likely to be very much affected by any reduction in road capacity in the town centre and it is important that we are presented with the whole the picture.

The Assessment acknowledges that not all impacts of proposed Blackwell Farm development have been modelled and that, due to the emphasis on the A31 and the A3, not all roads were included.

The report concludes that the improvements to the A3 are necessary to maintain adequate flow rates on the strategic network. Further work is needed to determine what impact any widening or junction improvements will have on local roads, and what will be done to mitigate against the increased flows through Compton, particularly given that a section of the B3000 through the Village is anticipated to become an Air Quality Management Area. GBC has resisted requests by members of the PC to have the northern end of The Street made an AQMA, but readings of nitrous oxide in this area are well above EU legal limits.

Note Annex 3 - Independent traffic report by RGP - attached.

There is little information about the tunnel but the map indicates that one access / egress point will be in Compton near the A3, although no land has been safeguarded for this purpose. This is likely to have the same impact as the improvements to the A3, i.e. increased traffic (and pollution) through Compton.

## The Spatial Hierarchy

The spatial hierarchy, which outlines Guildford's preferred strategy, does not match up with the proposed plan. The hierarchy places Brownfield sites (including those on Green Belt) as a priority, but the Plan has 66% of development on Greenbelt and only 34% on Brownfield. The hierarchy lists Guildford town and urban areas as a priority followed by inset villages and identified Green Belt villages. A relatively small percentage of housing is allocated for Guildford town (the most sustainable location) and Green Belt areas, such as Blackwell Farm, with high sensitivity have been classified as within the 'Guildford urban area' when they are in fact in the open countryside. We are told that only 1.6% of the 89% Green Belt has been earmarked for removal and that the 6% removed via inseting doesn't count as these villages are already developed. If this is the case, why list them in 4.1.16 of policy s2 - Spatial Strategy?

4.18 The preferred options cannot accommodate all that Guildford 'needs'. This is untrue. Two specialist consultants have independently critiqued the OAN and both question the level of uplift and the use of ONS data without full correction for changes and anomalies. They refer to 'double accounting' as the uplift is introduced at several stages and the assumptions that result in the final OAN are not explained. See comments on Strategic Housing Market Assessment (SHMA).

## Strategic Housing Market Assessment (SHMA)

### We Object

The “objectively assessed need” figure of **693 homes a year is too high**.

A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, **the housing need figure should be revised down to 510 homes a year** and the SHMA method should be changed to consider student housing need separately due to the distorting effects of students on the figures.

The current SHMA inflates the proposed housing figure due to:

- failure to correct for errors in the historical data for international migration flows,
- issues with the way it considers students and affordability, and
- flaws in the method for estimating the number of homes needed to support job growth.

It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

Two additional reviews of the SHMA reach similar conclusions, one having been produced by CPRE and the other by Cllr. David Reeve.

## **The Land Assessment**

### **We object**

The exclusion of sites of 5 dwellings or fewer from the list might make administration easier, but the addition of these sites plus windfalls and outstanding (but current) permissions gives rise to a higher number of dwellings than is actually needed. There is therefore no justification for release of all the Green Belt put forward.

The criteria used to include or exclude sites because of this study lack consistency, with many sites excluded as 'unsuitable' with no further explanation offered (many of which were in the urban area of Ash). The assessment lacks objectivity and detail.

## **Green Belt & Countryside Study**

### **We object**

GBC's Green Belt & Countryside Study does **not value appropriately the "fundamental aim"** of Metropolitan Green Belt or look strategically at options for developing in major settlement areas beyond the Green Belt. It is pointless for London to apply constraints to protect its Green Belt if areas within it, such as Guildford, choose to ignore this option. It is the same Green Belt and serves the same purposes, all of which are acutely valuable.

The way Green Belt is parcelled up and scored is invalid: serving 2 Green Belt functions well is as legitimate as serving 3 to 5 functions less effectively. The Green Belt sensitivity analysis is not a valid basis for informing decisions. This method also omits purpose one, on the basis that all Green Belt sites encourage regeneration of urban sites. This should not be excluded for it is valid and could even be argued to be

particularly valid in areas close to the town. Boundaries used for Blackwell Farm were neither permanent nor defensible.

Proposed removal from the Green Belt of a number of relatively small sites where development of an exceptional nature has taken place, plus adjoining land, has lost sight of the scale at which Green Belt is effective.

Assessment of which villages to take out of the Green Belt does not adequately consider that villages contribute to the openness of the Green Belt, as seen from surrounding AONB.

A key principle of Green Belt is its permanence. The University Consultants stated this 13 years ago when seeking permission to take Manor Farm out of the Green Belt to create Manor Park. They reassured residents that the boundary would not be frequently moved and that Blackwell Farm would be opened up to the public for “informal recreation”. The same Consultant has now repeated this promise in putting forward the University plans to develop on Blackwell Farm, saying that the new boundary would be permanent for at least 25 years!

## **Question 2: Legal compliance**

**The Plan preparation process has had inadequate regard for national policy, which attaches “great importance” to the “openness” and “permanence” of Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level.**

**The Sustainability Appraisal seems to have lost sight of the concept of Sustainable Development as described in the National Planning Policy Framework to the extent that we question whether it complies with the requirement.**

**The report states that there are no pollution issues in Guildford. This is not true. The A3 end of the B3000 exceeds Eu regulations and this should be flagged in the 2015/16 air quality report which the Council has yet to publish.**



## **We object**

The 2015/2016 air quality management report has not yet been published and this will/should include an area at the A3 end of Compton, which exceeds the recommended max NO2 reading. One year results for NOx are **48.728 with high's of 68 using National bias adjustment.**

Cllr Furniss indicated that the location of the test tubes may have made them invalid, but measurements show that they were positioned correctly and monitored for over a year by GBC environment officers, who have now added additional monitoring devices (See Annex 1 – Correspondence between Cllr Curtis and Cllr Furniss). This area qualifies as an air quality management area (AQMA) and it is disingenuous to omit this from the report or to use an old report on the basis that the 2015 report is not yet published, as the problem is known and recognised by the environment department within GBC.

The traffic survey shows increases in overall flow at the B3000 monitoring point, of values between 5.6% and 16.5%. This would severely impact flow, which is not in line with National Policy as further congestion would exacerbate the current air quality issues as the A3 end of the Street.

We do not believe that a regulation 19 consultation is appropriate. Whilst few changes have been made, additional sites have been included without opportunity for regulation 18-consultation input.

The video used and paid for by GBC and taxpayers is biased towards development, and hence raises questions over the validity and legality of such marketing campaigns. All the individuals featured in the video, with the exception of one nurse have previously spoken in the Council Chamber in favour of house building/building on Blackwell Farm; and there is not a single voice representing protection of the Countryside or outstanding landscapes.

**Site A26 - Blackwell Farm - See Annex 4 attached.**

## **Question 3: Soundness**

### **We object**

The plan is not so much positively prepared as avariciously prepared. We do not consider that it is reasonable to take on unmet need from neighbouring authorities,

which have given greater protection to their Green Belt if it means our own is compromised on the scale being put forward.

***We believe that constraints should be applied to the housing target, which we understand equates to the objectively assessed need (OAN) as no reasonable constraints have been applied. The constraints that could and should be applied are Greenbelt and considerable infrastructure issues. The solutions suggested to accommodate the inordinate levels of growth are both inadequate and costly and the net result will be serious debt for many years if not generations.***

It was recommended by landscape consultant Alison Farmer Associates that the area known, as Blackwell Farm should be considered in the AONB boundary review, yet it was omitted in Surrey CC's landscape evaluation. This meant the Parish Councils of Worplesdon, Compton and Wanborough had to fund an independent review to ascertain whether the area was a contender for AONB classification. The survey was carried out by in May 2016 by Land Management Services Ltd, which concluded that most of the 265 hectare farm was of a landscape and scenic quality that merited inclusion within Natural England's revised Surrey Hills AONB boundary.

It raises serious question about the soundness of the evidence base when Surrey CC says that it only has to account for evidence submitted and not for that omitted? ***The area within the proposed development site at Blackwell Farm should now be considered by Surrey Hills as part of the AONB boundary review and land to the west should remain undeveloped, as it is important to the setting of the AONB.***

The plan is not justified. Residents groups have suggested other strategies but these have not been tested or considered against the current trajectory, which has remained largely unchanged since day one.

Many aspects of the Plan were strongly objected to in 2014 and not only have these points been ignored, they have in fact been embellished or made worse. I refer to the points that GBC referred to in their own summary, which stated that most people objected to the scale of development and the harm to the Green Belt. At that time there were 4 strategic sites and now there are 5. At that time approx 50% of development was in Green Belt and now it is 66% with only 34% on previously developed sites. 58% of development is on just 5 sites.

***A more realistic appraisal of the town centre with more multi-storey car park development and less retail would make way for a greater percentage of housing in the town centre, which is after all the most sustainable and sought after area. Additionally, greater pressure must be placed on the University to house more students at Manor Park in order to free up affordable rented accommodation in the town for key workers.***

***There is a conflict of interest when the developer (University) drags its feet over the provision of promised student accommodation (thereby putting pressure on the housing market) whilst at the same time seeking permission to build 1,800 new***

***homes to help Guildford's need? The University is at least five years behind with programme of building student residences and staff housing. It is widely agreed among residents groups that the University must fulfil all of its current building plans and substantially increase the proportion of students on campus. If the University built the outstanding units, the housing need would reduce substantially yet much of this is omitted from the outstanding permissions list?***

GBC has approached development without applying constraints that are applicable such as Green Belt and infrastructure. It is wholly inappropriate to build a Plan without constraints when there is widespread opposition to this approach. Furthermore, there are serious doubts over the validity of the objectively assessed housing need. Housing need underpins the entire plan, and we are being asked to accept the figure of 693 on trust. Without an understanding of the methodology behind the OAN, the public cannot 'buy into' this figure, especially as it has been illustrated by two reputable professionals that there have been errors such as 'double accounting', which has resulted in uplift. Both consultants have concluded that a more accurate figure would be around 500 new homes pa and the most recent one, which was done in pre Brexit -June 2016 acknowledges that due to the high number of International students here in Guildford a student SHMA would better inform this plan. Both consultants feel that the current SHMA is flawed and that the OAN of 693 is too high. These reviews will be submitted by CPRE and the GRA and we support the findings of both.

Putting 58% of development on 5 sites, which are within the Green Belt, or largely within the Green Belt, is not consistent with national policy. The definition of 'exceptional' is forming an exception or rare instance; unusual; extraordinary. What possible exceptional circumstances can justify 3 sites of approx 2,000 each and two of 1000 each, on Greenbelt. This makes a mockery of the term 'exceptional'?

The plan has a maximum number and a hefty buffer. It has underestimated windfalls and overestimated need. It is likely therefore that if one of the major sites fails to come through, the Plan could still succeed in terms of numbers, but would fail in terms of impact on infrastructure and reliance on aspirational, but distant 'yet to be discussed' schemes such as railway stations, making the plan undeliverable. If more people are not given the opportunity to live in Guildford town, the night time economy cannot grow and if the gamble to use 40% of the land for retail fails, shops will close and we will have created a leafy green ghost town, whilst the villages outside the town will have changed beyond all recognition as the impact of urban sprawl takes its toll.

The plan puts many eggs into 5 baskets with 58% of all development on just 5 sites. If these are not deliverable, the plan will fail. This strategy has been roundly criticised by Inspectors in other parts of the country.

Taking on such a high OAN without scrutinising it and then taking land out of Green Belt to fulfil it, and using developer funding to secure infrastructure (which reduces significantly the proportion of affordable housing delivered) is destructive and risky.

It is inconceivable that 5 sites between 1,100 and 2,000+ each can be built on Green Belt land without affecting the purposes of the Green Belt.

AONB should be given the highest protection. Despite being put forward for AONB review Blackwell Farm was omitted and an independent consultant had to be commissioned by local parish councils. The findings showed that the area met Natural England's latest criteria for AONB and should not therefore be developed but should instead be properly recognised.

The proposal at Blackwell Farm has been reduced from 2100 to 1800 to take account the impact on future AONB or for views in and out of the existing and future AONB from public areas as determined by planning policy. It is feared that if this site were approved and if access could be made possible without causing serious problems to the surrounding road network, that the AONB in this location would undoubtedly be destroyed.

GBC argues that it is necessary to remove more than 1.6% of its 89% Green Belt and to remove more than 6% of its Green Belt from villages (by way of inseting) in order to meet its need, yet at the same time the Council advocates making an additional area Green Belt? The area of land being put forward for inclusion within the Green belt is on the same ridge as two areas of Green Belt it wishes to remove (Normandy & Blackwell Farm). This approach lacks consistency.

Cllrs Paul Spooner and Matt Furniss have stated clearly that there will be no development without supporting infrastructure and that the infrastructure must come before, or alongside, development. It is difficult to see how this will materialise as developers' CIL contributions (which will fund infrastructure) are paid from profits made from the development. This statement appears to be unenforceable and could offer false reassurance to residents who may support the Plan on this basis.

Developers are being asked to fund large amounts of infrastructure. They will offset this against any agreement for affordable housing and it is highly possible that affordable housing will not be built or that only a small proportion will be built. This was one of the key drivers and is factored into the housing need, yet may not be delivered. Where is the general analysis to see what level of affordable housing might actually be delivered given the level of infrastructure needed to implement this level of development on new sites?

The omission of the Town Centre Master Plan (on the basis that this has different timescales) invalidates two key components of the Plan - the Infrastructure and Highways assessments. The suggested road closures in the town centre and the resulting re-routing of traffic should be factored into the highways assessment, but they are currently omitted. The consequences of this could render the whole Plan undeliverable and I don't believe the Plan can be approved without factoring in the Town Centre Master Plan.

GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA), which CPRE and GRA consider unsound. The methodology for the uplift and assumptions made have not been made available and thus the openness and transparency required for public understanding as outlined in the NPPF has not been adhered to.

We understand that Highways England will not start to consider its intentions as regards the A3 in the vicinity of Guildford until 2018. It is difficult to see how plans can be approved without the inclusion of this information.

Network Rail has not made available for the public consultation any plans for a new railway station at Mellow, nor have we been told where the station car park would be situated nor how the railway bridge between Mellow and Burpham would be re-constructed to take the additional traffic. Likewise, there are no detailed plans for the railway station at Park Barn and Network Rail has not confirmed the status of either. These schemes must have a sounder footing to be included in the Plan if they are to be used to justify large developments nearby.

The access to, and from, Blackwell Farm (via the A31) has not been thought through. The proposed new route will likely be used as a rat run to the A3/Guildford, but this will put pressure on a congestion hot spot, and result in increased traffic at the Compton turn-off and Down Lane (home to Watts Gallery). It is also recognised that congestion at the Tesco roundabout will be made worse and this area is already subject to considerable problems. Additional traffic via the business park from Blackwell Farm will add to congestion at the Egerton roundabout and impede access for emergency services to the hospital.

The proposal at Blackwell Farm has been reduced from 2100 to 1800 to take account of the AONB, but this does not account for views in and out of the AONB from public areas.

The greenbelt sensitivity study is not objective. The reference to Blackwell Farm as 'South West Guildford Urban' is totally misleading as it is unadulterated countryside that fulfills all the purposes of Green Belt. We consider this Study, which was the subject of much criticism in the last plan, to be flawed, yet it remains in this Plan. We ask why?

The damage caused to the Green Belt by the addition of Blackwell Farm would outweigh benefits gained from development, as there is ample space and lapsed planning permission on the existing Manor Park land for development for student accommodation, which would free up affordable rented accommodation in the town.

The proposal for Garlic Arch was added to the draft Local Plan without any consultation under Regulation 18.

No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Guildford citizens.

No land has been safeguarded for a tunnel, which would show a real intent.

This consultation included 'significant changes' according to GBC, although most residents would strongly dispute this. Some key reports were added and 6 weeks was not long enough to properly digest the information and impart this to residents. Many additional questions had to be asked and many points required clarification, which essentially meant adequate information, was not made available until two thirds of the way through the consultation.

The level of objection at the 2014 consultation was considerable - these objections have NOT been dealt with, but have been carried through to a regulation 19 consultation, undeterred. This is not in the spirit of Localism or the NPPF.

## **Question 4: Duty to cooperate**

Cooperation is a two-way street. Guildford objected to Waverley's plans for Dunsfold on the grounds of increased traffic and in the same submission referred to positive consideration of unfulfilled OAN. Guildford also refers to its duty to consider Woking's unfulfilled housing. Guildford does not have land to spare to assist Waverley or Woking without taking vast amounts of land out of Green /belt, which is protected by the NPPF. Greed is not 'an exceptional circumstance' and if both Woking and Waverley (and indeed London as it is the Metropolitan Green Belt) prefer to protect their Green Belt then the question must be asked as to why Guildford is happy to relinquish its Green Belt land, especially in the face of strong public opposition.

*Many also question the choice of just Woking and Waverley as partners in the SHMA as there are considerable links with Aldershot and Farnborough in Rushmoor, which have very different needs and their inclusion could have provided a better balance.*

## Question 5: Examination

*Compton Parish Council objects to the inclusion of Blackwell Farm to the plan and will seek representation at the examination stage and would therefore wish for a representative to attend.*

## Question 6: The content of the plan

**We object to the inclusion of Blackwell Farm in this Local Plan, for the following reasons:**

- 1) The southern slopes of the Hog's back are AONB and views in and out of that area should be protected and this is not possible if the development goes ahead.
- 2) Blackwell Farm has recently been assessed by an independent expert as being of AONB quality and we anticipate that it will be included within the Surrey Hills AONB as part of the forthcoming boundary review
- 3) The South Downs is National Park and there has been a call for the North Downs to be considered in the same light. This would make Blackwell Farm a great asset to Guildford and a tourist attraction (particularly as it is home to one of the few Model Farms in the South East) and would fit in well with the rural ventures such as Greyfriars Vineyard, Mane Chance horse sanctuary and Watts Gallery, all of which are in close proximity.
- 4) Blackwell Farm is very effective in fulfilling the functions of Green Belt.
- 5) Blackwell Farm land which has been categorised as the best and most versatile (Grades 2 and 3a) and there is strong demand for local food production.
- 6) More people objected to the inclusion of this strategic site than to any other strategic site, its inclusion is not supported.
- 7) The 4-way access to the site on the A31 (Hog's Back) is highly unlikely to be viable, and would harm to the AONB for miles (due to the need for lighting and its elevated position). The suggestion that rat running could be deterred through the use of automatic number plate is unrealistic. What about visitors and deliveries and changes of vehicle? Likewise, a barrier would cause chaos and possibly increase the volume of traffic wishing to use the A31. If no restrictions were put into place, the route will become a rat run, then there is nothing from stopping traffic on the A31 from using it if it is indicated as the shortest route. If the A3 were congested traffic could also come off at the Compton roundabout and take this route via Down Lane, which would add to

congestion in this busy village and would negatively impact the tranquil lane, which is the home of Watts Gallery and Chapel. See annex 4.

- 8) Maps, tables and results from assessments such as traffic impact all refer to the Blackwell Farm site as in "Guildford urban area" and refer to non-existent boundaries as if they are current. There is nothing urban about this area of countryside as the independent landscape assessment reveals.

## Question 7: Any other comments?

### Comment - Localism

The Plan is supposed to be informed by residents and by parish councils and residents' groups and their input used to formulate the Local Plan, not for it simply to be presented to them and objections and subsequent input ignored. Despite a great deal of effort from these groups and many like-minded responses, the Plan has not taken their concerns on board. The Plan has barely changed since day one and residents feel their views have been ignored and that the consultations have not been genuine. To add insult to injury, some of the key points raised have actually been exacerbated or made worse, such as the scale of development and harm to the Green Belt and issues over infrastructure.

The NPPF is open to interpretation, but it is our belief that GBC has chosen to interpret it in a way that lacks objectivity in an effort to appease developers in order to avoid costly court cases at a later stage. GBC has cited cases where development has been granted in an effort to justify this pro-development stance but has failed to balance this against the many sites where development has been refused.

To gain true public reaction, material presented has to be factual and unbiased and written without jargon and acronyms. This has not been the case. A degree of 'double speak' has led to absurdities such as 'affordable housing' which is over £300,000 i.e. ten times the average salary; 'safeguarding' which does not mean protection of land as most people would think, but rather potential future development and 'insetting' which means removal? It is recognised that these terms are not locally derived but all the same they are confusing for members of the public.

Some Councillors have shown a lack of knowledge about environmental matters.

| Cllr. Gunning - webcast 24th May section 7 - 3:39



'About ancient woodlands, of course they are very attractive things, but they are ancient and trees don't last forever, so can we be practical about ancient woodlands and consider their value or their life, I should say, their life'

May 11th - Cllr Ellwood announced that he couldn't understand what all the fuss was about pollution as his Mother had lived (presumably unaffected by it) under the flight path at Heathrow?

Whilst people have been encouraged to take part in consultation, objectors have been subjected to name calling and public humiliation. There are too many examples to list and so I am listing the most recent. <http://www.guildford-dragon.com/2016/07/10/letter-not-surprised-mr-patons-comparison/#comment-157440>

The Local Plan has divided communities and highlighted weaknesses and alliances, which have resulted in a breakdown of trust between residents and those whose job it is to implement the Plan.

The Plan has been roundly criticized and objected to and yet it is presented to us once again. Many feel the consultations to date have been worthless and feel they have already made their points, which were ignored and will not therefore be making them again as they fail to see the point?

It simply is not possible to address infrastructure shortfalls by building in the hope that developers contributions will cover the costs as the level of development needed negates any benefits gained and in many cases, the situation is made worse.

Central government funding is needed to address current problems so that funding from development can be used to implement additional infrastructure needed to make new sites viable without damaging their surroundings. It must be accepted that geography and lack of previous investment leaves some areas with less opportunity to do this than others.

## Policies

### POLICY S1 SUSTAINABLE DEVELOPMENT

**We object** to policy S1 as stated and the presumption in favour of sustainable development.

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Policy S1 ought to set a clear framework. No definition of “sustainable development” is given.

The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The promise “to secure development that secures the economic, social and environmental conditions in the area” omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is without value. Under this policy, any development will qualify as “sustainable”, thereby failing to apply the NPPF’s most important guideline.

The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies.

The commitment to approve planning applications “*wherever possible*” and “*without delay*” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.3 .

## **POLICY S2 PLANNING FOR THE BOROUGH**

We object to policy S2 the Borough Wide Strategy and the commitment to build 13,860 homes based on the Strategic Housing Market Assessment (SHMA) 2015 prepared by GL Hearn.

The OAN “objectively assessed need” figure in the SHMA of 693 homes a year is far too high

We are surprised and concerned that GBC have adopted the OAN of 13,860 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50% from the 594 new homes identified in their own SHMA. “ It should be noted that local evidence (Strategic Housing Market Assessment - SHMA) highlights a need for an additional 499 new affordable homes every year in the Borough and a total of 594 new homes every year when taking into account demand. Given the level of environmental constraints present in the Borough, it is considered that the provision of an average of 292 dwellings per annum represents a reasonable level of housing growth for Woking and is deliverable.”

Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development “because of the environmental constraints which exist in the County, including Green Belt”. This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years. It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the urban areas to accommodate this requirement.

However it would appear that today GBC have effectively ignored the real potential of the urban area to provide for housing. At the same time GBC has adopted a radically different approach to the policy of the Council over the last 20/30 years and are now ignoring government policy in relation to the Green Belt.

A detailed and comprehensive professional review of the SHMA dated June 2016 by NMSS an independent expert firm dealing with housing and

demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 693 homes per annum to 510 homes per annum.

The 41 page report by NMSS (annex 5) which can be found on the GRA website entitled “A Review of the West Surrey SHMA as it relates to the Objectively Assessed Housing Needs of Guildford”. It was a real community effort. It was paid for by over separate 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing need figure presented in the Local Plan.

The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald. He is an independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit.

NMSS found that the SHMA used in the Local Plan incorrectly adds extra homes to its basic demographic projection to allow for improving affordability of housing, increased student numbers and economic growth. The report found that none of these additions were justified based on the evidence presented within the SHMA. The report concluded amongst other matters that:

- The affordability of housing in Guildford is no worse than in other Surrey districts and boosting supply beyond the demographic OAN would not result in a noticeable improvement in affordability but simply in more people moving to the area.
- There are reasons for believing that the SHMA’s estimate of the number of homes needed for students may be too high and that an adequate provision for students is already included in the demographic OAN. The report advises that the Council should commission a separate student housing need figure for Guildford given the distorting effect of students on our overall OAN. It envisages that, once this exercise is undertaken, improved accuracy means the overall OAN would be likely to reduce still further.
- The SHMA seeks to estimate the number of homes needed to support employment growth using employment rate assumptions that are

inconsistent with the employment forecasts. This produces misleading results. An analysis of the Cambridge Econometrics and Oxford Economics forecasts using employment or economic activity rate assumptions consistent with the forecasts suggests that in neither case is there a need to provide more housing than suggested by the demographic analysis. Indeed, in both cases a smaller population growth (and hence fewer homes) could support the jobs growth that is forecast.

A further independent report was procured in 2016 by the Campaign for the Protection of Rural England CPRE from Richard Bate of Green Balance, an independent consultancy with expertise in demographic and housing matters to carry out a review of the GL Hearn SHMA

The report by Green Balance runs to 37 pages (annex 6) and its findings are that the OAN for homes in Guildford should be reduced from 693 per annum to 481 because:

1. the vacancy rate figures should be taken from local government annual records rather than from the 2011 Census. This would reduce vacancy rates to 2.9% in Guildford.
2. there should be no increase for affordability above basic demographic change.
3. there should be no increase for Student housing and it was considered unrealistic that the University should be allowed to exert such substantial pressure on the domestic housing market.
4. the use of employment-led forecasts should be abandoned using purely household projections instead which are more reliable as a form of prediction.

Two completely independent expert reports are surprisingly consistent in their findings. In broad terms a figure of approximately 500 homes per annum would appear to be a correct estimate of OAN for Guildford. However, this is before constraints are applied to arrive at an acceptable housing target.

The SHMA is based on pre-Brexit projections for economic and population growth, including migration. These now need to be revised downwards.

It is unacceptable that demographic and economic model assumptions have been withheld by GBC and cannot be checked making the process unaccountable.

The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by

a claim to intellectual property by commercial sub-contractor used in preparing the SHMA.

Both the National Planning Policy Framework and National Planning Policy Guidance provide a clear policy direction that the overall housing target should be reduced by a variety of constraints to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors. I have corrected this omission below. Infrastructure policies should be planned at the same time as Local Plans but in this case they have effectively been left out and are not sufficiently developed.

The Framework also makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.

Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.

## **THE NEED TO APPLY CONSTRAINTS**

Ministerial guidance in relation to building on the Green Belt is clear:

1. “the single issue of unmet need - is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt” - Nick Boles to Sir Paul Beresford MP 7th February 2014.
2. “we were always very clear that we would maintain key protections for the countryside, and, in particular, for the Green Belt. The Framework makes it clear that a Green Belt boundary may be altered only in exceptional circumstances and reiterates the importance and permanence of the Green Belt” – Nick Boles to Sir Michael Pitt, Planning Inspectorate 3rd March 2014.
3. “Planning Guidance, updated in March 2014, also states that unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt” – Nick Boles to Sir Paul Beresford MP 18th June 2014

70% of the sites put forward in the Local Plan are in the Green Belt which flies in the face of current government planning policy. The National **Planning** Policy Framework (NPPF), National Planning Policy Guidance and case law

make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries.

Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements).

Constraints should be applied to the Objectively Assessed Housing Need (OAN). However this itself is overstated and should be reduced from 693 per annum to 500.

In view of the comments above it would appear logical to apply CONSTRAINTS in line with government policy to a corrected OAN. of approximately 50% to account for the fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major infrastructure. This reduction is in line with the constraints percentage of 50% applied by Woking Borough Council.

This would result in a more acceptable and practically achievable HOUSING TARGET of 250 homes per annum which over a 20-year period would be 5,000 homes. All of these homes could be built in the existing urban brownfield areas of the borough and would in part satisfy the 20,000 objections made by residents to the 2014 draft plan and also relieve the additional problems of inadequate infrastructure.

It would also mean that there is currently 8.5 years supply of housing (2131/250) which is made up of existing permissions granted (1,518) and completions made (613) during 2013/2015. (Monitoring Report by GBC 2015)

The Brexit vote may have strengthened government policy further. Theresa May, the new prime minister, announced on 11 July that she is personally committed to protecting the Green Belt once she takes office.

Whilst I have many significant objections to the GBC Local Plan I applaud the policy statement by GBC in their Monitoring Report, "We will continue to monitor the use of previously developed land, and continue to identify as many opportunities as possible for redevelopment of previously developed land." I believe it will be to the benefit of all residents if GBC can apply themselves vigorously to this endeavour in order to protect the Green Belt.

## **POLICY H1 HOMES FOR ALL**

**We object** to policy H1 Homes for all.

Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set any rules on



important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

We support higher density development but not high-rise development (ie over 10 floors) in the urban area close to transport hubs to facilitate modal shift e.g. 20 minutes' walk of Guildford railway station.

Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council's timidity is a case of "regulatory capture" by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog's Back. Surrey University has 17 ha of car parks that could provide all the student accommodation required above it, with parking beneath.

Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.

## **POLICY H2 AFFORDABLE HOMES**

**We object** to policy H2 Affordable homes.

"Affordable" homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people's means and that starter homes will not become available for local people.

In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.

We question the assumptions that seem to underlie this policy: that people have a right (rather than a legitimate aspiration) to own a home; that they should be encouraged to live locally (contradicting the Government's policy of encouraging labour mobility and development in



poorer regions, where homes are cheaper anyway); that increasing local house-building will reduce overcrowding and congestion (rather than simply suck more people into the borough); and that it will stem the rise in house prices (even though 13,860 new homes will be a drop in the ocean, given that prices are determined by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and by the currently low cost of capital for overseas and other buyers). The weak mechanisms proposed in the plan might influence the market in a more remote part of the UK, but not here.

This policy's version of "affordability" is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

### **POLICY H3 RURAL EXCEPTION HOMES**

**We object** to policy H3 Rural Exception Homes

This is a type of Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the "mix", this can include "market" housing – i.e. normal commercial development which in Guildford usually means expensive executive homes. This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances."

### **POLICY P1 AONB**

**We object** to policy P1 Surrey Hills Area of Outstanding National Beauty

This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

Many of our concerns stem from the loose wording of the Policy, which in some places renders the policy ineffective, for example:

“All proposals will be considered against whether they...”

“All development proposals within and adjacent to the AONB will be expected to conserve or enhance its special qualities”

Terms such as “considered” and “expected” are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage. Of particular concern is the paragraph 3, which begins:

“Whilst the AONB designation does not preclude specific types of development in the Surrey Hills and proposals will be assessed on their individual merits...”

This whole opening clause is unnecessary and almost invites development proposals. I believe that it should be deleted, and the sentence should therefore begin: “There is a presumption against major development in the AONB in accordance with NPPF.”

In addition to the weakness of the language, I am also concerned that the AONB criteria listed in the policy are not the most important ones in determining whether a planning application should be approved. Aside from the one outlined in the first bullet point (which relates to the AONB setting) none of these criteria is concerned with the key characteristics of AONB, ie landscape character, scenic beauty, important views, tranquility etc. Whether or not a development supports the rural economy or provides public access are of far less national importance than preserving the quality of the landscape itself.

We believe that the AONB Policy in the Draft Plan 2014 provided greater protection to the AONB, and would like to see the following sentences reinserted:

“The national significance the AONB will be afforded the highest level of protection and only proposals which can be sensitively amalgamated into the area and which complement and enhance the character of the AONB will be considered”

“Proposals within the AGLV which would have a negative impact upon views into and out of the AONB and which do not respect the setting, will not be acceptable”

In accordance with the most up to date Minerals and Waste Plan, safeguarding of applicable land within the AONB and/or AGLV may be necessary and deemed appropriate

Finally, we would like to see a clause which gives protection to the candidate areas for AONB status in the forthcoming Surrey Hills AONB Boundary Review. This should include Blackwell Farm which was recently reviewed by an Independent consultant (annex 1) and deemed worthy of inclusion as a candidate. I consider that all land that has been assessed as meeting the latest Natural England criteria for AONBs should be subject to the same level of protection as an AONB, not just land that has been designated AGLV.

## **POLICY P2 GREEN BELT**

**I object** to Policy P2 green belt

This policy states, “the general extent of the Green Belt has been retained.” This is a misleading statement.

The policy wording is weak in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. Once gone it is gone forever.

Policy P2 completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one

another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world.

Policy P2 omits any assessment of the Green Belt's value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

1. Agricultural production
2. Rural leisure and tourism amenities
3. Water catchment
4. Flood control
5. Biodiversity
6. Natural heritage
7. A carbon sink for air pollution
8. Room for public facilities such as parks and burial grounds
9. Profitable film locations (e.g. Shere)
10. Future economic potential such as mineral extraction (even fracking)
11. Natural beauty, landmarks, open space, rural views and sight lines
12. Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)

As a matter of law and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations.

It is quite incorrect to argue, that the plan would involve the loss of "only" 1.6% of the borough's Green Belt. In reality the figure is nearer

7% when inseting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold.

We believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors.

We object to the removal of over 400 hectares of Green Belt land in and around **Blackwell Farm** to facilitate further development of Surrey Research Park and for 1800 homes. Over 60 hectares were removed from Green Belt 12 years ago for the same developer (Surrey University) who has yet to fulfill their planning obligations. This valuable land has been squandered with over 17 acres of surface car parking and as one of the key features of Green belt is its 'permanence' this second request for yet more Green Belt land to be released in such a short space of time, with all the outstanding issues that remain makes this all the more objectionable.

Furthermore we object on grounds of the impact this development will have in terms of congestion on our highways, these issues have been highlighted under 'infrastructure'.

## **POLICY P3 COUNTRYSIDE**

**We object** to policy P3 Countryside (i.e. beyond the Green Belt)

This is more protective – as a policy – than the proposals for the AONB and the Green Belt, so is anomalous. We are not in favour of building on this area, since urban, brownfield areas are sufficient to meet all reasonable housing targets. There is no need to build on any green fields if brownfield, previously developed land is used efficiently (without garden-grabbing).

This policy refers to the countryside near Ash and Tongham (see paragraph 4.3.28). There is no obvious justification as to why a stronger policy protection is needed here than in any other part of the borough. The fact that the current and previous Council Leaders represent it should not give it preferential status: “we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location”. Green Belt and AONB areas should by definition have higher levels of protection than non-Green Belt areas.

It should also be noted that Ash and Tongham lie beyond Guildford far away from London and therefore make no contribution to controlling Metropolitan urban sprawl, that is presumably why Ash and Tongham

are not in the Green Belt already. This policy, however, attaches higher priority to preventing the “coalescence between the Ash and Tongham urban area and Aldershot” than it does to the primary purpose of the Metropolitan Green Belt, which is to stop London sprawl. We agree to the prevention of coalescence but this should apply to all villages including East and West Horsley and Flexford and Normandy.

## **POLICY P4 FLOOD RISK**

**We object** to policy P4 Flood risk and water source protection zones

Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as Woodbridge Meadows Industrial Estate and the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented. It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside.

We strongly believe that this policy should not be used as a convenient excuse not to build on the extensive area of brownfield sites between the station and Ladymead. Any new development in this area could easily be built above flood resistant ground floor parking in areas that are identified as high flood risk. This area has been built over successfully over the last 50 years. We do not need to stop now.

We do not support building directly on flood plain as the land is effectively a soak away, but intelligent architecture has been dealing with this problem for many decades in other parts of the UK and the globe.

## **POLICY P5 SPAs**

**We object** to policy P5 Thames Basin Heath Special Protection Areas

This policy is not robust enough. The mitigation (cash compensation) offered for development in the special protection area is insufficient.

SANG (Suitable Alternative Natural Greenspace) is not beneficial since the sites identified or targeted are already green space. This is just using agricultural or wooded land as recreation land in order to justify building on other green spaces nearby. There is no actual increase in open space

or environmental protection; instead, it is a ploy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds – must also ensure that it is not using land which is adjacent to the Special Protection Areas.

## **POLICY E1 SUSTAINABLE EMPLOYMENT**

**We object** to policy E1 sustainable employment

We note that there is a significant reduction of between 71% and 79% in the previous job target and resultant 79% reduction in employment space in response to the many objections lodged in 2014 against an unsubstantiated agenda for economic expansion in the last draft and based on new findings by Aecom in the latest ELNA 2015.

We have concerns as to the ill-informed clustering of all B classes in terms of the clarity of market evidence required to inform effective planning and a failure to provide a clear understanding of business needs required under Section 160 of the NPPF.

We also note the dramatic reduction in assessed demand by two Employment Land Needs Assessment Reports carried out under the same terms of reference within a period of 2 years which calls into question the general reliability of the process of collection and interpretation of data in the overall forward planning process by GBC. We are concerned however that the research undertaken by Aecom is generally superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space.

No proper analysis has been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC and no robust assessment of local market demand apart from fairly brief references to freely available market research undertaken by commercial estate agents such as Lambert Smith Hampton covering a much wider area.

There appears to be a lack of appreciation of the fundamental rationale of the Use Classes Order as a planning tool in terms of useful property market research or forward planning.

What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 generates at least 5 times as much employment as B8.



The lack of appreciation as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. E.g. the creation of a research and development park linked to the University but now has the threat of being downgraded into a general business park (see below).

Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan.

Little regard is given to the opportunity of B1 b space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub.

We note that the past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 derived from VoA analysis and that the calculated annual floor space demand is 0.7% over the plan period up to 2033.

We support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the funding necessary to pay for the infrastructure and environment this sort of industry requires.

## **POLICY E2: LOCATION OF EMPLOYMENT FLOORSPACE**

**We object** to policy E2 location for new employment floor space

We object to the policy of expanding the Research Park onto Blackwell Farm and I do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt.

The Surrey Research Park currently extends to 65,000 sq m. There is already granted consent to expand to a further 9,000 sq m (14%)

The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis.

The ELNA 2015 calculated annual floor space demand is 0.7%.

The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period. The necessary growth in floor space over the plan period is therefore 17 years x 0.7% = 11.9%.

There is currently 14% expansion space already available.



The proposal by GBC to expand the 65,000 sq m by 9,000 sq m (existing allocation) with an additional 35,000 sq m amounts to an increase of 67% of the Research Park which is not required.

The Research Park is currently developed at a density of 25% plot ratio. The majority of existing buildings are 2 stories giving a developed floor space plot ratio of 12.5%.

The existing Research Park has the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing densities of existing academic buildings on the university campus which are three to four times higher.

Together with the existing expansion of 14% through existing consents and the opportunity to increase its density the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university.

A preferred location for increased B1a and B1b space would be in the Town Centre close to housing and a convenient transport hub

## **POLICY E3 MAINTAINING EMPLOYMENT CAPACITY**

**We object** to Policy E3 maintaining employment capacity

We object to the ill-informed policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land. It is also contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).

We believe that the existing government policy which has recently been made permanent of allowing change of use from B1a to C3 is sound

Many office buildings reaching an age of more than 30/50 years become redundant in terms of energy compliance making them illegal to occupy for employment purposes and the cost of refurbishment makes them redundant and uneconomic

The reality of market demand is that the gross development value of refurbished residential space is in excess of the gross development value of refurbished old office space in many locations (this gross development value assessment is supported by the analysis by property consultants GVA in the supporting evidence within the Allies and Morrison Masterplan for Guildford dated 2015)

To resist change from B1a to C3 is contrary to the concept of brownfield first for residential development schemes.

To resist change from B1a to C3 in Strategic or Significant Employment Sites is contrary to the concept of integrated mixed use communities whereby the journey to work is minimised.

London has led the way with significant residential schemes being created from redundant office stock. A good example is the South Bank in London adjacent to Waterloo Station where in 2005 the Shell Centre has been converted into flats. Another early example is the 2000 scheme at Metro Central Heights at Elephant and Castle where the old Alexander Fleming House was converted to 435 flats by St George. GBC needs to adopt more modern trends and policies.

## **POLICY E4: SURREY RESEARCH PARK**

**We object** to policy E4 Surrey research Park.

We support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. I object however to the completely unnecessary expansion of the Research Park into a larger Business Park. We believe that the planning policy going forward for the Surrey Research Park should be to maintain and enhance the integrity of its research base allowing for the economic value add to the local economy of knowledge and technology transfer from the University.

We believe that B1b (should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. We object to the inclusion of B1c uses which is inappropriate and unnecessary.

Research parks based on the early UK technology transfer exemplars of the Cambridge and Oxford need careful monitoring, nurturing and protection to ensure the integrity and quality of the park is maintained and the park continues to be a destination for innovation and enterprise

There is a danger for research parks to be overwhelmed by short sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in time turn them into standard business parks which can be found anywhere in the country. Their relative low density and attractiveness make them targets for “any other” office user

Research parks that lose their way stop being the location of choice for new innovative enterprises.

We hope the Surrey Research Park in Guildford remains focussed on a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence, robotics and super-manufacturing

Monitoring indicators should include new start-ups and new patents created

Facilities should be provided whereby new small businesses can secure premises under subsidised licence fee arrangements with no onerous rent or lease commitments

We support the idea of a variety of sizes of unit including some small units (between 15 – 80 sq m) bearing in mind one workstation is 10 sq m

Consideration should be given to the concept of shared “enterprise hubs” where individuals can take pay as you go workstations in shared spaces similar to touch down business centres similar to the “enterprise village” concept

We object to the policy of any new extension of the research park more than the existing 14% already provided for within the park or within the footprint of the park

The Surrey Research Park currently extends to 65,000 sq m

There is already granted consent to expand to a further 9,000 sq m (14%) This space has been available for 10 years and is still to find a taker

The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis

The ELNA 2015 calculated annual floor space demand is 0.7%

The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period.

The necessary growth in floor space over the plan period is therefore 17 years x 0.7 = 12% which is less than the current expansion space of 14%.

The research park is developed at a plot ratio of 25%. This could be increased to 50% within the same footprint of the existing park without damage to its amenity. The actual current land use for development in the park is in fact only 12.5% because most buildings are 2-storey.

## **POLICY E5 RURAL ECONOMY**

**We object** to policy E5 Rural Economy

Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism that require local people to be consulted and heeded, not ignored. Villages need protecting in terms of both design and scale and character.

Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This disregards the responses from the 2014 public consultation.

The consultation process was not well publicized; many Parish Councils had no idea of this. The emphasis on voluntary efforts and greater community efforts is far removed from reality for this 'solution' was presented for almost every aspect of rural life from managing crime to looking after elderly to education and more besides. Villages by nature are usually small and the percentage of the population who are able to do voluntary work is smaller still. The solution is therefore unworkable. The results of the consultation were not publicized but were instead collated and summarized and bore no resemblance to the submissions we had sight of.

#### POLICY E6 LEISURE AND VISITOR EXPERIENCE

**I object** to policy E6 the leisure and visitor experience.

We believe that the importance of a visitor attraction hub could be much better articulated. Guildford has great potential to become a “must see” destination for tourists and visitors. Surrounded by the natural beauty of the Surrey Hills, it is already distinguished as an historic county town. The historic part of the town should be exploited to the full creating a real sense of vibrancy and atmosphere. This should be linked to the attractions of the Museum, the Castle, the Wey and the historic High Street including its views of the Hogs Back. .

The economic impact would create big advantages for both the leisure and the niche speciality retail sectors in the town. Given the local and wider catchment of the town Guildford should strive for high quality definition making it a great centre for people to live in and visit.

Guildford the historic “Gateway to the Surrey Hills” has far more potential than Guildford just any other stereotypical centre found anywhere around London. Re-branding walks, such as a new “Pilgrims Trail” similar to the Patriots trail in Boston USA with marked yellow footsteps leading from the station to the River and up through the historic heart of the town.

There is a need to make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this,

the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

There is a need to help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to RHS Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently bypass Guildford to go to Bath, Oxford or Cambridge instead.

## **THE TOWN CENTRE OPPORTUNITY**

We do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact. What the town centre needs in terms of urban regeneration and to attain a thriving night time economy is more residential development.

The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015. The reality is that the Town Centre and other areas of brownfield in the borough has the capacity to provide significantly more than this.

## **POLICY D1 MAKING BETTER PLACES**

**We object** to Policy D1 Making better places

We object to the absence of any reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force.

The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design? Should it not result in better-designed buildings?

## **POLICY D2 SUSTAINABLE DESIGN**

**We object** to Policy D2 Sustainable design, construction and energy

Sustainability should be an overarching ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, “like a golden thread”. It should be set out clearly in Policy S1, not buried away as a minor detail in Policy D2.

This policy amounts to “greenwashing”, expounding aspirational environmental targets while ignoring the plan to build dormitory towns across the Green Belt that are environmentally and socially unsustainable. These settlements will bring vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and more greenhouse gas emissions, noise and light pollution. This policy should not be just about saving energy but about preserving the borough’s stock of natural capital, especially the countryside, from attempts to rig the housing market.

This policy’s emphasis on Combined Cooling Heating and Power and communal heating networks is difficult to understand, since no such networks are available locally.

## **POLICY D3 HISTORIC ENVIRONMENT**

**We object** to policy D3 Historic Environment

This policy clashes with the strongly pro-development agenda of the rest of the plan and fails to address the contradiction. History is unamenable to improvement, so the policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to “support development” that might “enhance” heritage assets leaves wide scope for abuse in the form of destructive commercialisation and financial leveraging of relevant sites.

This policy is based on the false premise that Guildford’s heritage is inherently in decay. This is a developer’s charter – a short step away from the idea that the historic environment needs to pay its way to be preserved. The Council’s reviews of Guildford Museum and the Electric Theatre support this interpretation. Whatever the “reasoned justification”, the actual policy wording in the blue box leaves too many loopholes.

Development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

## **POLICY D4 DEVELOPMENT IN URBAN AREAS**

**We object** to policy D4 Development in urban areas and inset villages

This policy that does not address the opportunity for building in the urban area

The plan envisages that 40% of homes built will be “affordable”, but this does not provide any accommodation for low-paid workers, for example, those on the minimum wage, who cannot afford to buy so-called “affordable” homes or pay an “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail, warehousing and distribution sectors (all of which this plan aspires to expand).

The number of homes planned in the urban area is much too low. There is a need for regeneration in many urban areas, particularly Guildford Town Centre but this is ignored in favour of building homes on green-field sites instead.

This will not address urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure.

The plan envisages a large expansion of the retail sector, but this is hard to justify because the sector is in rapid and continuous decline.

## **THE BROWNFIELD OPPORTUNITY**

Yes, we need a new Local Plan for our borough in order to provide a development strategy within which we can accommodate our local housing, economic and environmental needs. But first we must make good use of our urban brownfield before we consider building in the Green Belt or countryside.

Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy that states clearly. “We are committed to a brownfield first initiative whereby all applications on previously developed land are given fast track priority and every facility to promote development for residential purposes and employment purposes in order to satisfy the needs of local people. In parallel a low



CIL incentive should be given for all residential development on brownfield land.

In response to the detailed objections received in the Regulation 18 process of the 2014 Local Plan and also in accordance with government policy a Guildford brownfield land register should be urgently compiled showing address, ownership, occupier, current use and detailed planning brief

Perhaps someone could be appointed at GBC with a clear briefing to deliver brownfield targets of housing and employment space

GBC needs to accelerate the residential redevelopment at Woodbridge Meadows, Walnut Tree Close and the Station within the next 5 years

GBC needs to examine the residential development opportunity of the 25.7 acres of car parks in GBC ownership

We do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact.

The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which has recently been adopted by GBC. The reality is that the Town Centre has the capacity for significantly more homes. See details on GGG website - Guildford Greenbelt Group

## **POLICY I1 INFRASTRUCTURE AND DELIVERY**

**We object** to policy I1 Infrastructure and delivery

Most of the borough's infrastructure is straining to accommodate current needs and organic growth, yet this plan's commitment to building housing estates across the Guildford countryside will mean either major infrastructure investment that massively under-funded or an implosion as transport, educational, medical, energy, water and communications services become simultaneously overloaded.

The plan targets greenfield sites – requiring heavy infrastructure investment – in order to generate CIL income necessary to meet an infrastructure shortfall that is already serious. The current draft CIL scale also encourages development on greenfield sites rather than brownfield



and will reduce or negate developer's obligation to sell a percentage of homes at 20% below market value.

The policy wording says nothing about roads and traffic. The Council's methodology for assessing infrastructure needs in this area is inadequate, identifying only the tip of an iceberg of existing congestion. Compton Village is already close to tipping point, yet it will see a significant increase in traffic volume, will be completely congested and yet no plans exist to mitigate the problem.

The schemes referred to in this policy barely solve existing congestion and are inadequate when development takes place. The full impact on local road networks has not been fully considered. Some proposed development locations would require highway schemes that involve demolishing property and road-widening in residential areas to solve the resultant congestion. The A3 improvements are not guaranteed to take place but they are being used to justify removing large areas from the Green Belt before detailed traffic assessments have taken place. These detailed investigations are being deferred until the planning application stage and will be left to developers to prepare. If a site then proves to be unsustainable its Green Belt protection will have been lost for no reason and unsuitable development will take place by a more insidious process. Compton Village will actually incur increased traffic flow as a consequence of A3 widening according to the study, yet as was pointed out above, no solutions are in place to improve the situation.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritising greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough's infrastructure capacity for sustainable development, and then tailor development accordingly.

This plan, however, assumes infrastructure will follow on the heels of housebuilding. It makes implementation critically dependent on providers outside the Council's control and on the vagaries of CIL income. Instead of recognising this as a key issue, the plan makes too many assumptions, not least being the verbal promise that development will not take place without infrastructure preceeding it. It is not clear how this will happen and is not in the Plan, as it should be, if it is achievable.

The highways network is under stress at peak times in many parts of the borough. Queuing is the daily experience of drivers going to and from work. The local plan recognises the problems in para 2.14. Much of the road network is single-carriageway, and junctions act as constraints.

The key evidence on future traffic conditions is provided in the Strategic Highway Assessment Report (SHAR) which summarises the results of the tests carried out by Surrey County Council at the request of GBC. Five scenarios were examined using SCC's strategic traffic model.

Scenario 1 contains all developments and planning permissions from 2009 to date. As such it corresponds to today's circumstances, and describes the current unsatisfactory traffic conditions in peak periods.

Scenario 5 represents the position at the end of the plan period, including all development and highways schemes in the local plan

The results of the analysis show that there will be widespread congestion in the morning peak hour across the network. The key strategic routes, the A3 through Guildford NE bound, and the M25 between Junctions 10 and 11, are shown to be at or over capacity. The summary network statistics presented in the SHAR, while useful, require some interpretation because the analysis of vehicle-hours is derived from link speeds only, and does not reflect junction delays and queues. The tables that show the ratio of flow to capacity and level of service are especially helpful to gaining an understanding of the conditions on the network in the forecast. Where the forecast traffic volume is above or close to capacity, flow becomes unstable and there is congestion. The SHA results provide evidence that, in 2031, congestion will be worse than it is today on much of the network.

It is the case that the traffic modelling does not take into account the potential for increased use of other modes, but the trip rates used for developments already have built in the typical level of use of other modes, and services will be required to meet that need. It is also the case that the model does not allow for park and ride, which would improve matters in the town centre, as discussed below.

In order to gain an insight into conditions across the network, it is necessary to combine information from several tables in the SHAR. Table 4.5 shows that the M25 and A3 will be at capacity in Scenario 5. The other roads that will have poor levels of service include those in Table 4.5 but also those in 4.12 (except the A3) and those in Tables 4.3 and 4.4 with levels of service E and F that will not be given some relief by improvement of the A3 in Scenario 5. Paras 4.10.3, 4 and 5 point out that there will be increased congestion. Given that the starting point is unsatisfactory, there can be no expectation that the schemes in the Infrastructure Development Plan will provide an overall improvement. There will be some local benefits, such as the Ash rail bridge for example, but in general conditions will be as bad and in many places, such as Compton Village, worse. So the statement in the SHAR para 4.2.5 that 'the combined mitigation as reflected in Scenario5..indicates that at

the strategic level it accommodates the additional PSLP demand' needs qualifying – 'at the cost of a lot of queuing' and makes no mention of the impact this will have on pollution, which is already a known problem at the A3 end of Compton.

The cumulative effect of the additional traffic generated by the developments in the local plan will be to increase congestion, even with the proposed highway schemes in place. More detailed analysis of the junctions and queuing is required. So we question the conclusion that the developments would have "an acceptable impact on the capacity of the highway networks in terms of the policy test set in paragraph 32 of NPPF".

Appendix 3 of the Transport Topic Paper shows the phasing of housing development and transport infrastructure. The major scheme being considered for the A3 between the A31 and the A320 is scheduled for delivery in the period 2023/24 to 2027/28. The strategic developments at Blackwell Farm and Gosden Hill Farm are shown as being phased in from 2021/22 onwards. The Garlick's Arch development is shown as starting in 2019/20. Therefore, there will be a period in which the existing A3 has to cope with the additional demand arising from those developments before extra capacity is provided.

The following comments regarding the strategic sites are taken from the SHAR:

Blackwell Farm – there will be congestion at the A31 junction, and the problems at the Tesco junction, and the Egerton road /Gill Avenue junction (para 4.9.5). Traffic is likely to access the Surrey research park and the RSCH through the development (para 4.7.3) (see annex 4)

Gosden Hill Farm – there will be an increase in traffic through Burpham. There will be pressure on the A3100/B2234 roundabout (paras 4.7.6, 4.7.7 and 4.7.8).

Wisley – traffic will increase on minor roads to gain access to the A3 (N and S bound) and other routes (para 4.7.11). The development will add more traffic to the A3. The Burnt Common slips help alleviate the traffic through Ripley according to the model, but queuing on the A3 could mean this does not happen (para 4.7.14)

Normandy/Flexford – the report has little to say about the impact of this large development. The increase in flow on Westwood Lane is noted (para 4.5.7). Tables 4.10 and 4.11 show junction delay reducing at the Westwood Land, B3000 junction, but an increasing at the Puttenham Hill/Millbrook junction.

Ash – development in Ash is not specifically addressed, but there are major increases in traffic on a number of roads. The new rail bridge will bring relief (but traffic will move to the next junction).

Slyfield – there are no remark relating to SARP, and as there are no additional trips shown in and out of the Slyfield residential zone in Tables 3.3 and 3.4, it is possible that this development has been omitted. There is a significant increase in trips to and from the Slyfield industrial zone, which will impact on the A320 and Clay Lane.

Town Centre – the report has very little to say about the town centre. It is evident that the model is forecasting severe congestion on the approaches to the town centre, such as the A281, the A31 Farnham Road, and Woodbridge Road for example. No mitigation measures are planned. And in the Transport Strategy, GBC states that the intention is to adopt Allies & Morrison’s Scenario 2 which would have the effect of significantly reducing the capacity of the town centre road system. The implications have not been examined, but traffic using the A281 from Waverley, for example, would be affected.

The B3000 will be severely affected by development schemes and will not benefit from road improvements. It is essential that the impact of all change to road networks are looked at in conjunction with one another for any survey to be meaningful. **The local plan does not state an objective for congestion. The two strategic objectives that are included for infrastructure refer to supporting sustainable development and delivering a balanced system. However, in para 2.15 there is an aspiration expressed about opportunities ‘to improve the performance of the road networks through transport infrastructure and service improvements’, which taken with the previous paragraph includes reducing congestion. The evidence so far shows that this will not happen. The mitigation proposed is not sufficient to overcome the problems that will be caused by the level of growth in the local plan. Congestion will worsen. The network will lack resilience and be vulnerable to disruption due to incidents. Minor roads will have to cope with a lot more traffic, for which they are unsuitable.**

## **POLICY I2 DEPARTMENT FOR TRANSPORT**

**We object** to policy i2 Supporting the Department of Transport’s “Road Investment Strategy”

This policy is too vague and unrealistically optimistic. Decisions by Highways England on improving the strategic road network (the M25 and A3) are still years off. The Council have suggested a very expensive

tunnel under Guildford, but there is no evidence to show that this is a realistic option. Even if Highways England accepted this (which is highly unlikely in the post-Brexit public spending climate) it would not be built until the end of the plan period at the earliest. Other, less expensive A3 improvements, and changes to the Junction 10/Heathrow stretch of the M25, will also take years to agree and complete.

The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is foolhardy. Surrey is the most congested county in England, with 683 people per square kilometre, compared with an English average of 413. This policy will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone). This is a major development constraint that should have been applied to the OAN to constrain the housing target.

## **POLICY I3 SUSTAINABLE TRANSPORT**

**We object** to policy I3 Sustainable transport for new developments

This is another aspirational policy. It consists of a standard, box-ticking list of local government measures unrelated to the specifics of the plan. Like infrastructure, transport appears to be an afterthought; the policy fails in its essential job of guiding planning decisions, since it assumes development of any kind can be supported by sustainable transport.

The sustainability of the dormitory settlements which the Council want built across the countryside depends on a general “modal shift” from private car use to walking, cycling and public transport. This is unrealistic. The proposed sites are often miles away from the nearest railway station. Bus services even in the largest villages are almost non-existent – just one bus to and from Guildford each day in the Horsleys and none at weekends. Since bus services depend on profitability, they cannot be expanded and the Council are not proposing to subsidise new ones. Rural buses are too slow anyway for busy people. Most rural roads in the borough are narrow, winding, hilly, potholed, muddy and unlit. Many flood badly and have no footpaths.

The desired modal shift would require a comprehensive co-ordination of bus and train timetables with services every few minutes, seven days a week, to stops within walking distance of every home in the borough. This kind of integrated public transport system has been achieved in Switzerland, for instance, but only at huge public cost and thanks to a political consensus supporting state ownership of trains, buses and the

post office, which delivers rural passengers as well as mail. There is absolutely no chance of this in the UK.

The vast majority of the borough's residents are not, in practice, able to cycle. This includes children, the elderly, commuters who have to look smart, the infirm, the unfit and people carrying goods or shopping of any kind. Dependence on walking and cycling discriminates against these groups, which include some of the most vulnerable members of the community. It is socially unjust. One in two working people in Guildford commute for up to 3 hours a day. They will not leave their cars for even part of their journey if it means longer travel times.

Park-and-rides are a welcome part of the transport mix but are too slow for commuters and others on a tight schedule. For an adult couple going shopping it is still cheaper to park in town.

We like the idea of water buses but have concerns over the reality. The Wey is narrow and, with a river speed limit of 4mph, boats are too slow for anything but recreation. Except on the tideway, not even the Thames has such services.

The addition of two new stations appears attractive but will slow down train journeys, which are already slower than at any time since the 1930s. Knock-on effects on localities where the new stations are built have not been worked out or presented. I.e. Cost of housing will increase.

## **POLICY I4 GREEN AND BLUE INFRASTRUCTURE**

**We object** to policy I4 green and blue infrastructure.

This policy is a box-ticking exercise with no teeth to it. It sits oddly with the plan's onslaught on the Green Belt. The plan to build on large areas of countryside and to inset villages will cancel out any benefits from extending the principle of enhancing biodiversity beyond Biodiversity Opportunity Areas.

There is no mention of the value of wildlife gardening to biodiversity or the important role that larger gardens play in a village setting.

## **ABSENCE OF POLICY ON RIVER WEY**

**We object** to the omission of a policy for the River Wey which was included in the previous local plan. The existing policy G11 from 2003 Local Plan should be included so that development within the River Wey corridor will only be permitted provided that:

It protects or improves the special character of the River Wey and the Guildford and Godalming Navigations, in particular their visual, setting, amenities, ecological value, architectural and historic interest;

The special character of the landscape and townscape in the corridor is protected or improved;

Views both within and from the corridor which contribute to this special character are protected or improved;

Where appropriate, public access is provided to and along the River and the Navigations.

The Nature Conservation value of the site is protected or improved

## **GREEN BELT SITES**

**We object** to ALL Green Belt sites allocated for development in the local plan

We object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses.” This ignores the tens of thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. This amounts to a war of attrition by the Council in conjunction with developers, since many busy residents are tired of repeating the same comments as it appears to be a waste of time and effort. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014.<sup>13</sup>

All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established.

## **POLICY A26 BLACKWELL FARM**

**We object** to policy A26 Blackwell Farm



There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of green belt, and fulfils purposes 1, 3 and 5 very strongly.

Purpose 1 - "checking the unrestricted sprawl of large built-up areas". There is huge pressure to develop on the western edge of Guildford; the University of Surrey has stated publicly that its key objective is to develop the whole of its landholdings, stretching west to Flexford Farm. This, combined with the indefensible boundary being proposed (a hedgerow rather than the existing belt of ancient woodland), will put more of the green belt and the Surrey Hills Area of Outstanding Natural Beauty (AONB) at risk of future development.

Purpose 3 "assists in safeguarding the countryside from encroachment" - the proposed movement of the green belt boundary on the west of Guildford to allow for development of the University in 2004 resulted in the encroachment on countryside and the loss of working farmland (including some Grade 2) at Manor Farm. The proposed future change in the boundary would result in further encroachment and the loss of farmland including further Grade 2. The proposed road development with access road from the A31 would also effectively cut off farm access to the south of the development area leading to further urban influence on this countryside. The University's stated key objective is to develop land, which includes Chalkpit and Wildfield farms leading to the risk of further boundary change and further encroachment in future years.

Purpose 5 - "assists in urban regeneration by encouraging the recycling of derelict and other urban land"

Whilst all green belt assists towards this purpose, the ownership of this land by the University of Surrey with its extensive landholdings within the urban boundary (including land it leases to the Hospital and Holiday Inn, the Surrey Research Park, Hazel Farm as well as two large campuses) means that the location of Blackwell Farm within the green belt plays an even greater and direct role in encouraging the more efficient usage of urban land.

Stopping development on Blackwell Farm would result in the University of Surrey investing in, and regenerating, land in its ownership and



delivering its commitments following the 2003 boundary review (including 270 homes for key workers, 3,125 student residences and releasing further accommodation at Hazel Farm). The University has 17 hectares of surface car parking that could be built over with offices and flats. This is a more sustainable option than building over open farmland (largely grade 2 and 3a) within the green belt.

The Blackwell Farm development would result in harm to the Surrey Hills Area of Outstanding Natural Beauty (AONB), harm to an Area of Great Landscape Value (AGLV), and harm to the setting to the AONB. (Blackwell Farm forms the views into and out of the Hogs Back ridge). The NPPF is clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic beauty. All development proposals within and adjacent to the AONB must conserve or enhance its special qualities. The NPPF also makes it clear that applications for major development in the AONB will be refused unless exceptional circumstances are demonstrated and the development is proven to be in the public's interest. Guildford Borough Council has not shown that the proposed housing development or the extension of the Research Park, or the proposed link road from the A31 to Gill Avenue, is in the wider public interest. Indeed, the increased traffic through the already congested Egerton Road/Gill Avenue junction, which would result from the development, would impede emergency vehicles travelling to the Hospital and this would be very much *against* public interest. GBC's Policy P1 states that, *"The Surrey Hills Area of Outstanding Natural Beauty (AONB) will be conserved and enhanced to maximise its special landscape qualities and protect it from inappropriate development. All proposals will be considered against whether they conserve and/or enhance the setting and views of the AONB"*. I question how the proposal to carve a new two-lane carriageway through the AONB fits this policy, or meets para 115 of the NPPF? Finally, nearly the whole site has been identified as a "candidate area" for AONB status in the Landscape Evaluation Study commissioned by Compton, Worplesdon and Wanborough parish councils. Therefore, the entire site should be treated as though it is within the AONB during this local planning process.

The access to the proposed Blackwell Farm site will put additional peak hour pressure on two of Guildford's worst congestion "hot spots": the A31 (Hog's Back) and the Tesco Roundabout on Gill Avenue. See annex 3.

GBC's proposal to create a new major route into Guildford from the west at, or close to, the Down Place private driveway, and to make this the

main access to the planned Blackwell Farm development, does not appear to have been thought through. There are queues stretching back from the Farnham Road Bridge as far as the Down Place driveway entrance most weekday mornings and any traffic generated by the new development would not be able to clear the junction. In order to accommodate the volume of traffic using the new junction (generated by residents of the new housing estate, employees at the Surrey Research Park, Hospital and University, and visitors to the new school/supermarket), there would almost certainly need to be a roundabout (rather than the proposed traffic-light controlled junction) and GBC has ruled out a roundabout on grounds of landscape impact and traffic.

The secondary access to the site at Gill Avenue also presents problems, and as GBC states in its Transport Assessment (14.9.5), changes planned for the Tesco roundabout will not mitigate against the increased level of traffic through the junction as a result of the Blackwell Farm development, and this in turn will impact on the Egerton Road/Gill Avenue junction, which serves the Royal Surrey County Hospital. I question whether it is responsible to allow a development that would impede emergency access to an A&E department and a major incident unit.

The traffic impact resulting from the development of Blackwell Farm on the strategic road network would not appear to be properly assessed but it would be alleviated in part (but not completely) by widening the A3. However, timing and funding for this work is unclear so there would be many years of traffic chaos before any widening took place (if indeed it does). More significantly, the widening of the A3 would create noise and environmental impact on the neighbouring residential areas of Onslow Village and Beechcroft Drive and a six-lane highway would cause greater severance between Guildford and Blackwell Farm and areas to the west.

The NPPF states in Section 6 para 47 that local authorities should “identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15”. In a footnote to this, it further adds, “To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.” I consider that the proposed access arrangements to Blackwell Farm are wholly inadequate for a

development of this scale and thus the site cannot be “vially developed”. See annex 4

## **Policy A55**

We object to the removal of land from Greenbelt for the provision of two traveler pitches on Puttenham Heath Road to 'enable delivery'. The area warrants Green belt status and should remain in Green Belt. Removal is a big step towards the eventual development of permanent accommodation, which would result in loss of the two pitches.

## **Maps**

The maps have different ratios, which can be rather misleading in terms of comparing one with another.

The map for Compton suggests that the dotted pink line is the boundary line for the village when in fact this is just the village settlement area. The wider village includes Priorsfield Road and The Avenue and Down Lane and parts of New Pond Road and the Hog's Back and Blackwell Farm, all of which are missing. Common land should ideally be marked up. Blackwell Farm is currently shown on a map called 'Guildford Urban' which of course does not exist and hence this could be misleading.