

## DRAFT LETTER

Local Plan Consultation,  
Planning Policy,  
Guildford Borough Council,  
Millmead House,  
Millmead,  
Guildford, GU2 4BB

Or email to: [localplan@guildford.gov.uk](mailto:localplan@guildford.gov.uk)

Dear Head of Planning

I wish to register objections to the Local Plan on a number of counts.

### GREEN BELT

Our Green Belt is precious. It is what protects London from urban sprawl; it preserves air quality; it prevents flooding; it is the city's playground. It is for us to conserve and protect it. There are 5 legal purposes for Green Belt, and it meets them all:

- *To check the unrestricted sprawl of large built up areas*
- *To prevent neighbouring towns merging into one another*
- *To assist in safeguarding the countryside from encroachment*
- *To preserve the setting and special character of historic towns*
- *To assist in urban regeneration by encouraging the recycling of derelict and other urban land.*

### NO EXCEPTIONAL CIRCUMSTANCES

The local plan proposes ~ 9000 new homes to be built on Green Belt land (compared with ~ 50 000 current homes in Guildford, so approx. equal to 18% of the existing homes in the borough) – a huge proportion. The National Planning Policy Framework (NPPF) requires any change of Green Belt boundaries to demonstrate exceptional circumstances. Unmet housing need is NOT an exceptional circumstance in law. No exceptional circumstances have been disclosed. So the Green Belt boundaries should NOT be changed.

### HOUSING NUMBERS

The housing numbers proposed are for 13040 homes over 15 years from 2016 to 2031. This number is too high. It does not taken any account of the constraints that apply locally. It is based on a Strategic Housing Market Assessment (SHMA) which the full council required to be amended by the then Lead Councillor for Planning and the Head of Planning. No amendment has taken place; those individuals are no longer in their posts. A new, revised, SHMA on a joint basis with Woking and Waverley has not yet been published and is not part of the evidence base. How can anyone comment on the proposed plan when the fundamental housing number is still so uncertain?

### BROWNFIELD AVAILABLE

There is brownfield land available in the town centre which is being earmarked for commercial development rather than for housing. This is enough to meet our real needs for affordable local homes. There are enough vacant commercial sites to cope with genuine business need, and we have enough retail capacity already, so urban brownfield/derelict land should be used for housing.

### DRAINS, WATER SUPPLY, FLOOD RISK, CONGESTION

Our drains, our water supply, our medical facilities and our roads cannot cope with the proposed number of new homes. Building this number of homes will lead to flood risk here and downstream (along the Wey and Thames). The planned development on Green Belt is therefore unsustainable.

In conclusion, I must ask you to revise the housing number, and to amend the Local Plan to utilise brownfield land rather than green field sites.

Yours faithfully