

CPRE to GBC

As I am sure that you will understand, we in CPRE are very concerned at the way in which it appears that the Executive Committee decision is likely to stick with the G L Hearn housing figure of 652 per annum. We hope that there is still time for this to be reconsidered and amended downwards as indicated in the 3 minute speech I made at the GBC Executive meeting on 4th June, of which for ease of reference I gave copies to Sue Sturgeon. I had hoped that the points I have made in this document would have indicated ways that this could be done without controversy.

I was pleased to hear you say that you would be only too ready to lower the housing figure for Guildford if reliable evidence can be produced which demonstrates that the SHMA figure developed by G L Hearn is incorrect and in need of amendment. I think that there really is a danger that an objective Inspector may find the draft Local Plan unsound as proposed if the high housing figure of 652 is retained, especially where this is sought to justify encroachment onto AONB and Green Belt land.

It must be remembered that Surrey County Council passed a mission statement unanimously only last year in support of the Metropolitan Green Belt which recognised the responsibility they still felt for maintaining this heritage asset not only for Surrey but London as well. As you know, parts of the Green Belt were owned by the LCC originally, before being handed over to SCC for safe keeping when the LCC was dissolved. Subsequently, SCC handed over the Metropolitan Green Belt to the stewardship of local authorities such as Guildford but this did not as we understand it allow them to have a free hand as to planning policy, given Green Belt's importance to both London and Surrey as open countryside preventing

further urban sprawl.

At a risk of repetition, and with a desire to spell out our firm objections clearly, I have decided to reiterate the points which I think need your attention.

1. CPRE has consistently argued that the “evidence” submitted in support of the housing figures proposed has been flawed, and that housing “need” has not been correctly assessed and is far too high. This criticism of the “evidence” made available relates in particular to the Green Belt and Countryside Study (GBCS) by Pegasus, and the Strategic Housing Market Assessment (SHMA) by G L Hearn. Confidence in the reliability of both Pegasus and G L Hearn appears in our opinion to be misplaced.

CPRE Oxfordshire has employed an outside consultant to challenge the SHMA prepared by G L Hearn for their area, claiming that the assessed need is grossly overstated by more than double the total required. We have sent a copy of the Executive Summary of this report to James Palmer. We are advised that G L Hearn are the recognised authority in their field, but we question the work they have done for Guildford as well as Oxfordshire, and are pleased to hear that they will be reviewing their Guildford submission in the light of the revised population figures now submitted by the Office of National Statistics (ONS).

2. Edge Analytics have expressed reservations about the G L Hearn figures for Guildford too but have shown considerable restraint in their criticism. It is of course unlikely that firms within the same area of business activity will choose to express outspoken criticism of one another in public. CPRE suggests that it would be desirable to see and interview G L Hearn and Edge Analytics separately. It is our opinion that the G L Hearn document constantly attempts to ratchet up the housing figure in a manner

which is not objective, and undermines the credibility of the work they have submitted.

3. At the public meeting at which G L Hearn first presented the outline of their SHMA report to Guildford stakeholders, it was pointed out to them that the student population in Guildford had not been separately identified by them. It is of concern that G L Hearn failed to recognise this shortcoming in the work they were doing on behalf of GBC and seemed ill informed of the fact that the government had accepted the possible need for this student breakdown to be made. As we all now recognise, there has been an uncharacteristic increase in student numbers over the last 5 years caused by the wish to avoid the academic fees that have been progressively introduced in this country. Confusion has arisen because a lot of the “inward migration” in the G L Hearn assessment refers to students. CPRE finds it surprising that G L Hearn did not appear to be aware of this factor in a town where so much emphasis is made of the importance of the academic sector.

4. We question the way in which during the period of this consultation so many repeated statements have been made by GBC about the need for a high housing figure and “to roll back” the Green Belt. This reiteration appears to CPRE to be out of proportion. The Inspector’s decision to find the Waverley District plan unsound has been deliberately used to underline the need for Guildford to set itself a high housing target in this context to avoid a similar result. The prospect of not having a valid plan in place to control a planning process that otherwise would be decided by developer appeals has been used to frighten councillors and residents alike. However since then, the Planning Practice Guidance has helped to clarify the National Planning Policy Framework, and a range of other ministerial judgements and government statements must

now be taken into account in order to reach a better and more balanced judgement. We have to bear in mind also that the Reigate Core Strategy will be adopted shortly with a housing figure of 460 because constraints have been taken into account in a way which is not being allowed so far in Guildford.

5. Great emphasis has been made by GBC as to whether a 5 year supply of housing is in place or not. To assess this we have to take account of the planning applications that have already been permitted which according to the SHLAA is 1,480, and the additional student permissions outstanding which according to the University of Surrey amount to 2,121. Sir Paul Beresford MP has been advised by the Minister Nick Boles that student permissions count in full for the purposes of meeting housing supply targets. Therefore, total existing permissions exceed the 5 year requirement.

6. The issue as to when the period of analysis should start is another disputed area as this affects whether a backlog exists in housing supply against target over the last 5 and 10 years. Here, G L Hearn has, however, at least made clear that “in the period preceding the demographic projections in this report (which start from 2011) there was...no shortfall in housing provision.” The argument about the historic shortfall seems largely to be artificially created by the decision as to when the period of review starts and ends. CPRE maintains that the impact of the economic downturn causes the use of a 5 year period to be unrepresentative of the normal pattern of housing development in Guildford. We are surprised that such a big issue has been made of this matter. We must not forget that the developer may be interested in delaying building projects if this will facilitate the possibility of Green Belt sites becoming available.

7. We note that empty homes are not currently included in the assessment of the housing requirement, and understand that this will be taken into account in future. The problem of underutilization of existing housing by older people of course depends on GBC giving priority to the provision of more appropriate housing for this age group on brownfield sites, close to the facilities they require, so that they can move to housing which enable them to remain independent longer. We also do not understand why GBC has decided not to make any allowance for windfalls which have always been an important element of planning in the past and are included in other local authority figures.

8. We do not agree that no allowance should be made for “constraints” to be taken into account. These are listed in the leaflet provided to Sue Sturgeon under the heading “Housing Provision in Guildford Borough”. Included in this list is the Surrey Hills Area of Outstanding Natural Beauty and of Great Landscape Value and the Metropolitan Green Belt. Natural England is expected to progress work with the AONB/AGLV boundary review in 2015. CPRE does not agree that a Green Belt boundary review can be considered in anything but “exceptional circumstances” at the time of a local plan revision. This precludes repeat adjustments to Green Belt boundaries as proposed by the University of Surrey or the amendment of the Green Belt in a wide range of different locations at the same time. Ministerial guidance from Nick Boles and recent planning guidance makes it clear that “unmet housing need” is not in itself justification for encroachment into the Green Belt.

9. We are concerned that the infrastructure issues relating to Guildford are absolutely critical to the success of the local plan, but are so little under the control of the Council and remain unresolved as they depend on the decisions yet to be taken by the Highways Agency (M25 and A3),

the SCC (Waste, Minerals, Schools), Network Rail (North Downs Rail link, Merrow and Park Barn Stations), SCC (B 3000 bridge near Farncombe and elsewhere, Hogs Back and Chilworth A248/B2128 roundabout) , and Thames Water (Slyfield). Other issues involve Government bodies such as the Environment Agency, Natural England and the relevant LEP. Use of the “constraints” list should lead to a marked reduction in the housing figure to the region of 300 – 345.

10. We are concerned that the traffic analysis for 2031, taken from the SCC reports and GTAMS, has been questioned in an email dated 3rd June to Councillor James Palmer by a former Atkins executive who is a Fellow of the Institution of Civil Engineers and of the Institution of Highways & Transportation. This includes the following extract: “I fear that the assessments presented in GTAMs have been carried out using a set of data that underestimates the amount of traffic that the proposed expansion of the town will give rise to. Therefore, I suggest that the appraisal of interventions should be revisited.”

I shall be happy to discuss any of these issues further with you if you feel that this would be helpful.

Yours sincerely,

Tim Harrold

Vice President of CPRE Surrey and Chairman of Guildford District

Board member of the Surrey Hills AONB Partnership