

Guildford Greenbelt Group (GGG) Press announcement 26 August 2014

GUILDFORD BOROUGH COUNCIL LOCAL PLAN – PROBLEMS WITH CONSULTATION

Guildford Greenbelt Group (GGG) is very concerned about the current consultation process on the Local Plan. It considers that it is deeply flawed.

The Strategic Housing Market Assessment, the Sustainability Appraisal, the Green Belt and Countryside Study and the Settlement Hierarchy are all fundamental to the assessment of the Local Plan. Despite this fact, some documents are missing, some will not be made available at all while the consultation period is running, some were published half way through the consultation, some are incomplete, and very many have uncorrected errors. GGG considers that this cannot be the basis for a sound plan.

The evidence base is sufficiently incomplete that the plan cannot be fully considered. While some parts of the evidence base will be useable, the existing evidence base needs to be properly corrected and collated, the plan needs to be reconsidered; and then a proper Local Plan can be constructed on which a proper consultation can be carried out. The evidence base represents a huge volume of badly organised data (2.3GB), and, as has been noted by a number of councillors, changes within the evidence base from previous drafts are not marked or identified so the evidence base seems to have changed without notification.

Susan Parker, Chair of GGG said: "This is a mess. The people of Guildford deserve a properly constructed Local Plan with a fully adequate and accurate evidence base. It is time that Guildford Borough Council realised that consultation means listening to the views of the public, and amending plans accordingly, not just getting a rubber stamp for a pre-determined course of action on the basis of sketchy evidence. The public have recognised that the consultation exercises have been largely cosmetic, and they recognise that the Council has not changed its plans or proposals despite widespread public anger. The Council should listen to the people of Guildford.

"It is no good telling us that the alternative to this Local Plan is planning by appeal. The current situation is planning by Executive, with no evidence and no right of appeal, which seems to be worse."

SHMA (Strategic Housing Market Assessment). The housing number is still uncertain. The Local Plan was approved on the understanding that the housing number would be reviewed and amended by the then Lead Councillor for Planning and the Head of Planning, on the assurance of the then Lead Councillor for Planning, but the two individuals concerned are no longer in those posts, and there does not seem to be a current review in place. The draft SHMA was supposed to be subject to revision for errors and omissions, including forecasting errors drawn to the attention of Guildford Borough Council by the Office of National Statistics. This has not been done.

Instead, we now understand that there is a revised SHMA which is being prepared on a combined basis with the boroughs of Woking and Waverley. Although we understand that this draft is now available, we also understand that neither GBC councillors nor members of the public have had a chance to see this, nor will such an opportunity be presented to the public before the closure of the consultation.

Sustainability Appraisal and Habitat Regulations Assessment

Like the SHMA, the sustainability appraisal is a legally required element that underpins the plan. It is one of two documents that are required elements of a Local Plan. It is fundamental to the plan, but was not published, nor made available to councillors for approval, before the plan was issued. This was a serious omission, which in itself was enough to render the plan unsound.

In fact the Sustainability Appraisal was published on 6 August, noting that the consultation on this section would run from 7 August, ie drastically curtailed from the full 12 week consultation. Since this is a required element, it is inconceivable that a full consideration of the Local Plan could have taken place in its absence. The document is in itself little more than a holding document noting that it will require fuller detail in due course – it states in the introduction that it *“represents the first major step in the iterative plan-making process. As such there is little “plan-making/SA “story” to tell at this time”*.

Oddly, question 3 of the questionnaire always asked *“Do you agree with the sustainability appraisal of the Draft Local Plan”*. This question does not state that the appraisal was only published half way through the consultation - so that those who replied to this question before the publication of that document on 7 August were giving their approval sight unseen to an unpublished document – how were they expected to know? How can this represent consultation in any form at all?

Green Belt and Countryside Study (GBCS)

The flaws in this part of the evidence base were the subject of much public comment during the Issues and Options consultation. It was agreed by the Scrutiny Committee as the matter of a formal vote that the public should be fully involved in the scrutiny of the evidence base. This resulted in the figleaf of a public forum where the public were disregarded, developers were allowed to attend as representatives, and notes taken were incomplete.

Changes between versions of the GBCS have not been fully itemised, and do not reflect a formal response to consultation – in fact data appears to have been manipulated to make target sites more attractive, without taking the responses to the consultation into account. As noted, those changes are not fully itemised and require audit of the two documents to identify differences.

Part 6 of the Green Belt and Countryside study relates to the Gypsy and Traveller sites and inseting them within the Green Belt. This report is dated May 2014, but it was not included in the original listing on the evidence base, which refers to Vols 1-4, nor on the documents available for sale in hard copy. Volume 6 of the GBCS is referred to in the detailed narrative which is provided after a hotlink, but it seems it was not

included clearly on some disks circulated by GBC to members of the public. Given that it was not listed as available, the public would not necessarily have been aware of this document and that it should also be reviewed.

Conclusion

GGG would suggest that the evidence should have been accumulated and assessed prior to formulating a plan, rather than being pulled together to support a predetermined plan which had already been published. We would recommend that the evidence is corrected; that the plan is therefore reconsidered in the light of the revised evidence base and the changes in government policy (including the revised emphasis on the use of brownfield land); and that a revised local plan is then re-submitted for a proper consultation on a more sound basis.

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