

# Initial feedback on the draft Guildford borough Local Plan: strategy and sites consultation

October 2014



GUILDFORD  
BOROUGH

**Further information and alternative formats**

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## **1. Background**

We are in the process of producing a new Local Plan for Guildford borough to 2031. In autumn 2013, we consulted on our Local Plan Strategy and Sites Issues and Options document. This set out some of the strategic issues facing the borough and some of the possible options to address them. The representations made during this consultation fed into our draft Local Plan, which we published for consultation on 1 July 2014.

## **2. The consultation**

Consultation on our draft Local Plan ran from 1 July to 26 September 2014. During this time, we held about 40 events with the local community and other stakeholders. The Planning Policy team were available six days a week, between 10am and 4pm to discuss the Local Plan at 25 Swan Lane, Guildford and were visited by over 1,200 people.

In total, we have received over 19,500 comments from over 7,000 individuals, organisations and stakeholders. Whilst we are still in the process of analysing all of the responses, this document sets out the key emerging themes from people's feedback. We will publish all the responses we received as soon as possible.

## **3. Comments by the Leader of the Council, Councillor Stephen Mansbridge**

*This is not the final output from the recent consultation on the draft Local Plan, but it is a good interim summary of public opinion and the key feedback themes emerging from the wide range of responses. The Planning Policy team will continue to review these and progress the Local Plan in response to the relevant planning considerations raised.*

*In the near future, we expect to be in a position to release the West Surrey Strategic Housing Market Assessment (SHMA). This is a joint document produced with Waverley and Woking Borough Councils that has considered the feedback and any comments on our own SHMA.*

*There will then be further work – largely around infrastructure – which, together with the other applied constraints, will allow the Council to arrive at a housing number. We will continue to use every mechanism to get this number to the lowest sustainable point possible to pass the Inspectorate's examination.*

*Lastly, we will also take into account recent statements from the Secretary of State and Department for Communities and Local Government. The Planning Inspectorate has now been given a clear indication and stronger 'steer' not to allow development that will harm the Green Belt.*

#### **4. Next steps**

We are in the process of finalising a number of key evidence base documents. This includes the joint West Surrey Strategic Housing Market Assessment (SHMA) and the Employment Land Assessment (ELA). These studies will enable us to understand our housing and employment needs.

National policy and guidance states that we must meet our objectively assessed needs unless constraints indicate that development should be restricted. One of the feedback themes coming out of the consultation is the need to have a better understanding regarding the cumulative impact of development on our infrastructure, notably our roads. To assess this we are progressing a number of transport related studies. These include a further assessment of the cumulative impact of development on the highway network including specific work looking at the A3, and detailed work on the town centre. As part of this, we are continuing to work with Surrey County Council and the Highways Agency.

As we continue to analyse consultation responses we will also be able to consider the feedback we have received from some of the key statutory stakeholders. This includes for instance the Environment Agency in relation to flooding. We are finalising an update to our Strategic Flood Risk Assessment, which will inform decisions on whether further site-specific work is required. We will also consider feedback from Natural England in relation to the Special Protection Area (SPA) to assess whether we have sufficient Suitable Alternative Natural Green space (SANG) in order to mitigate potential harm to the SPA.

We will also continue ongoing discussions with infrastructure providers in relation to their services, and what new or expanded provision will be required in order to support planned growth. This will feed into our Infrastructure Delivery Plan. This includes for instance dialogue with Surrey County Council on the need for, and provision of, new secondary schools.

# Summary of key response themes from the draft Local Plan consultation

## Introduction and Background

- Concerns about wording used in Foreword
- Clarification on role and timetable of Delivering Development document
- Evidence base is incomplete and changing
- Previous consultation responses have been ignored
- Document is aspirational rather than enforceable, vague and passive
- Concern about the impact of development on the infrastructure

## Key facts about the borough

- Evidence base is incomplete and inaccurate
- Demographic projections are wrong
- No evidence of how constraints have been applied

## Our vision and ambition

### Vision

- Lack of a strategic vision of what Guildford will look like - both the town centre and the borough as a whole
- Lack of a vision for the villages - just housing sites

### Sustainability

- Plan does not strike the appropriate balance. It favours housing growth and the economy at the expense of social and environmental objectives
- Surface water flooding issues not acknowledged
- Insufficient infrastructure is identified to support the level of growth proposed (primarily relates to transport)

## Policy 1: Presumption in favour of sustainable development

- Support for the positive approach to development and working with applicants
- Support that brownfield sites should be developed first
- The need for homes is high so presumption in favour of development is sensible
- Concerns over the impact on existing and delivery of new infrastructure
- Sustainability needs a clearer definition
- The plan is not sustainable
- Object to sustainable development and its impact on infrastructure and local amenity
- Policy overlooks other parts of the National Planning Policy Framework (NPPF) (empowering local people, restricting development in the Green Belt, protection for birds and habitats directive, protecting natural, built and historic environment)
- Policy ignores NPPF's 12 core principles
- Monitoring of policy focuses on housing and commercial development – it should also include economic, social and environmental indicators and provision of infrastructure

## **Policy 2: Planning for the borough - our spatial strategy**

### Housing numbers

- Housing need number is too high
- No justification for this need or evidence base flawed
- Far higher housing figure than neighbouring authorities

### Housing locations

- No justification for building in the Green Belt
- More development should be focused on brownfield sites
- Development not equally spread across the borough
- Town centre should be used for housing

### Evidence

- Need an up to date Strategic Housing Market Assessment (SHMA)
- Current SHMA uses out of date Office for National Statistics population projections

## **Policy 3: Homes for all**

- Council has worked hard to develop an inclusive approach to policies and proposals
- Many workers cannot afford homes close to work so need more new homes
- Density should be appropriate to character of area
- Viability statement needs to be more robust – open to abuse

### Housing type

- Policy caters for all types of housing and spectrum of future home owners
- Need for wide range of housing sizes and prices including affordable, properties for downsizing, self-build plots
- No more executive homes for commuters
- Impact of students renting town homes has contributed to housing shortage and had an impact on new housing required. University should provide all student accommodation.
- Traveller sites in the Green Belt are inappropriate, concern about where will sites go and the number

## **Policy 4: Affordable Homes**

- Support more affordable housing
- Support locating affordable housing close to jobs, services and transport
- Support all affordable housing built being permanently retained as such
- Remove “subject to viability” as it encourages developers to avoid providing affordable housing

## **Policy 5: Rural exception homes**

- Delete the “viability” clause, as object to market housing being allowed in the Green Belt
- Traveller sites are not appropriate in the Green Belt

## **Policy 6: Making better places**

- General support for this policy
- Policy words will not be effective; it is unenforceable

- Use 'require' rather than 'expect'
- No commitment to design quality to ensure attractive design

**Policy 7: Sustainable design, construction and energy**

- Support for the policy in principle
- Policy should include specific requirements: rainwater harvesting, swift nest boxes, car charging points, renewable energy minimum, grey water reuse
- Policy is weak or imprecise: open to abuse, no negotiation
- Remove viability clause
- Use 'require' rather than 'support'
- The policy should rule out Green Belt development which will lead to a smaller housing number

**Policy 8: Surrey Hills Area of Outstanding Natural Beauty (AONB)**

- Equal split between supporters and objectors to the policy, however, most of the objections were regarding technical matters and related to a misunderstanding of the differences between Green Belt and AONB
- The importance of views and setting of the AONB was not given enough emphasis
- Recognition and protection of the Area of Great Landscape Value (AGLV) is supported

**Policy 9: Villages and major previously developed sites**

- Villages should not be taken out of the Green Belt as this will lead to additional development which will have an impact on infrastructure
- No reason to inset villages

**Policy 10: Green Belt and the Countryside**

- Support protection of the Green Belt
- Support for the new Green Belt south of Tongham
- Countryside should have similar weight to the Green Belt
- Have not demonstrated exceptional circumstances to review Green Belt boundaries – unmet housing need does not count
- Green Belt and AONB are constraints to meeting housing need
- All Green Belt serves the main purposes as well as other important functions such as recreation, wildlife, flood prevention, character, air quality

**Policy 11: Ash and Tongham Strategic Location for Growth**

- Local support for the commitment to dealing with infrastructure issues, other parts of the borough felt this should be done for their areas too
- Ash Green needs to be better protected and distinguished from the area of growth
- The area is receiving special or favourable treatment: Green Belt should not be created where it is being lost elsewhere, other areas don't get an area of separation or the same quality of infrastructure plan
- Infrastructure will be overwhelmed by this scale of development
- Flooding is a key issue that needs to be better addressed

### **Policy 12: Historic Environment**

- Support for the policy in principle
- Need for evidence on the historic environment, its condition and needs
- The plan as a whole will damage heritage, in contrast to this policy
- The wording of the policy is weak, loose, uncertain: 'will seek', 'it is hoped', lacks commitment to historic assets
- The policy lacks detail: enforcement, undesignated assets, street furniture
- The policy is too geared towards enhancement when it should aim to preserve
- Conservation area appraisals should have been done to help inform the local plan proposals
- The policy should rule out development near heritage assets

### **Policy 13: Economic Development**

- Lack of up to date Employment Land Assessment (ELA) to support the policy – raises soundness issues
- Policy should place more emphasis on high skilled employment
- Concern regarding the balance of land, jobs, commuting and homes with some saying more homes were needed to support the economy and others saying we should be providing more economic land and should be using strategic sites to meet housing need
- Poor road infrastructure is affecting economic success.

### **Policy 14: The leisure and visitor experience**

- Need to make more of and protect the countryside and the River Wey
- Policy does not list some of the main facilities
- Policy weakly written
- Beauty of the countryside is what attracts people – do not need anything else

### **Policy 15: Guildford Town Centre**

- Support housing in town centre; more sites should be developed for residential
- Less retail needed
- Inappropriate expression "build on these assets" in Vision could be seriously misleading
- Policy should expressly preserve the character of the town centre
- Take care with building heights; protect views

### **Policy 16: District and Local Centres**

- Set out justification for why impact assessment threshold should be lower than national threshold
- Should have same threshold for the town centre and for district and local centres
- Station Parade, East Horsley does not have a large supermarket; will cause harm if designated a district centre
- Policy says nothing about how the Council will protect existing rural shops and centres

### **Policy 17: Infrastructure and delivery**

- Existing infrastructure already at or near capacity
- Existing infrastructure problems must be solved before any more development:

- Roads, public transport, cycling and pedestrian infrastructure, flooding, schools, water supply, waste water infrastructure, health, utilities and telecommunications (various locations given)
- Concerned policy would take into account economic viability; necessary infrastructure must be provided to support new development

### **Policy 18: Sustainable transport for new developments**

- New rural development will be car dependent; no cycle lanes, few footways
- Policy wording should be more forceful; unclear how Council will "facilitate"
- Need to improve network of dedicated cycle paths and cycle storage; cycling has many benefits

### **Policy 19: Green and blue infrastructure**

- Enhance the River Wey
- Other policies undermine this policy by proposing development on open space
- Support for a basketball court in the borough
- Unclear on definition of blue infrastructure
- Designate Stonebridge Wildlife Refuge as a nature reserve

### **Appendix A- Glossary**

- Travellers generally no longer travel, but are of a recognised ethnic group
- No definition of urban
- Clarify the definition of sites larger than 200 homes
- The Green Belt definition should not refer to landscape

### **Appendix B- Infrastructure Schedule**

- Object to construction of a car park on common land at Effingham Common
- Sustainable Movement Corridor is unrealistic, not costed and full route not set out
- No up-to-date assessment of need for open space, sports and recreation facilities – as required by NPPF paragraph 73
- Surrey County Council's initial assessment of the two proposed secondary school sites found transport and ecological concerns
- Surrey County Council anticipate needs for secondary education should be met in a sustainable way and any new schools should be located on suitable land near to the communities that they are intended to serve
- Surrey County Council will continue to co-operate with the Council to find new sites for:
  - potentially two more primary schools; one to the west of the town and one on edge of Guildford town centre, in addition to those in draft plan
  - at least one new secondary school (depending on size)

### **Appendix C- Evidence Base (and question 1 of questionnaire)**

- Support for the evidence base
- The housing number is too high or SHMA is flawed: out of date or flawed Office for National Statistics data, incorrect use of student numbers, SHMA is in draft form, insufficient work on constraints, incorrect immigration assumptions, five year trend in migration is used – should be a 10 year trend

- The housing number is too low: affordable need is high, Council has chosen lower end of the range with no justification, no consideration of situation in neighbouring boroughs and London, errors in historic supply, no account of historic under supply
- The evidence base is too difficult to access or understand
- Brownfield and urban regeneration is not adequately researched
- The evidence base is manipulated to achieve a desired outcome (more development)
- Missing studies: Strategic Environmental Assessment (SEA), Sustainability Appraisal (SA) of sites, transport strategy, tourism survey, viability assessment, Infrastructure Delivery Plan (IDP), needs of vulnerable people, ecology, ELA, Duty To Cooperate paper, Equalities Impact Assessment (EIA)
- Green Belt and Countryside Assessment (GBCS) is flawed or manipulated
- ELA uses out of date data
- Settlement hierarchy is flawed/manipulated: private schools included in education provision, settlements scored incorrectly, inconsistent returns from parish councils, non-existent facilities
- Strategic Housing Land Availability Assessment (SHLAA) sites sometimes include Suitable Alternative Natural Green space (SANG) and sometimes not, SHLAA should be a joint study, should not address sites of less than 5 units, does not maximise brownfield use, no allowance for windfall or outstanding permissions
- Transport: studies assumed zero population growth, incorrect baseline figures, does not address Local Road Network (LRN) and Strategic Road Network (SRN) situation, Local Transport Strategy not available, does not have regard to M3 Local Enterprise Partnership (LEP) evidence, Options Growth Scenarios Transport Assessment Report (OGSTAR) completed before draft Local Plan finished, no regard to Guildford Town and Approaches Movement Study (GTAMS), lack of supporting studies
- The Retail Study is out of date so not compliant with the National Planning Practice Guidance (NPPG), does not address needs of potential development, does not cover changing retail patterns (online, mobile payments), does not acknowledge retail space approved since 2011
- Viability should include cost of traveller pitches
- Strategic Flood Risk Assessment (SFRA) is not up to date and account has not been taken of the Surface Water Management Plans (SWMP) for Ash and Guildford

#### **Appendix D- Superseded Policies**

- The policies may cover similar issues but wording of policies is more vague than the 2003 policies

#### **Appendix E- Borough overview map**

- River Wey corridor needs to be included to ensure it is considered a strategic asset in the borough

#### **Appendix G - Maps**

- Majority of comments received focussed on Effingham, Fairlands, Normandy and Flexford, Guildford urban area, Horsley, Send, Worplesdon
- Object to inseting of villages from the Green Belt
- Object to loss of Green Belt
- Adverse impact on character of villages

- Disproportionate amount of development
- Infrastructure currently cannot cope
- Impact on infrastructure and particularly transport routes/congestion
- Send – particularly concerned about proposed enlarged settlement boundary and inseting from the Green Belt, concern about absence of evidence to substantiate proposals, and loss of village identity, no environmental impact assessment and no traffic assessment, too many homes proposed in Send
- Worplesdon – too many homes proposed in area, disproportionate to other areas

### **Appendix F- Policy and Monitoring**

- Provision of development is not the only measure of success
- Monitoring of the historic environment using solely the Historic Environment Records is not sufficient

### **Planning for sites**

#### **Guildford Town Centre**

North Street (Site 20)

- Refurbish the bus station in its current location
- Must include housing on the site
- Too much retail proposed; could have negative impact on existing shops

#### **Guildford Urban Area**

- Concern regarding Guildford cathedral proposals (Site 43), especially loss of views and green space
- Pond Meadow (Site 46) – should be allocated for educational use in place of the proposed new secondary schools, or community use
- Slyfield Area Regeneration Project (SARP) (Site 48) – flood risk and transport infrastructure concerns
- Tony Purslow (site currently being used for temporary parking for hospital) – concern about loss of this car parking

#### **Ash and Tongham Urban Area**

- Concern about infrastructure, narrow lanes and traffic congestion
- Concern re high density

#### **Within villages**

- Objection to proposal at East Horsley countryside depot and BT exchange (Site 57) because partly in a conservation area, impact on infrastructure and site not suitable for Traveller pitch
- Objection to proposal at Ramada hotel (Site 58) due to impact on traffic congestion and pressure on existing difficult junction

#### **Land around Guildford urban area**

- General feedback themes across all sites – harm to Green Belt, no exceptional circumstances identified to justify loss of Green Belt, infrastructure cannot cope with amount of growth proposed, infrastructure not given adequate consideration in the draft

Local Plan, the infrastructure proposed is not sufficient, traffic congestion, brownfield sites should be used, plenty of brownfield to use

- Gosden Hill Farm (Site 59) – adverse impact on West Clandon – creating sprawl and joining areas together, four way junction or junction improvements needed at A3, some support for new train station at Merrow, concern about the impact on the setting of the town
- Blackwell Farm (Site 60) – increased traffic and impact on A31 and A3, impact on AONB and loss of views, loss of amenity land, impact on infrastructure like hospital, wildlife, loss of agricultural land, flood risk, requests for more info about University of Surrey unimplemented planning permissions, impact on other areas such as Wood Street Village, Fairlands
- Land north of Keens Lane (Site 61) – specific concerns about the standard of Keens Lane (narrow road and on street parking since new developments built), impact on wildlife corridor, impact on the common, question need for a care home, impact on character of the area, disproportionate amount of development proposed in Worplesdon ward
- Land at Liddington Hall (Site 62) – site contaminated, site been rejected previously, impact on rights of way, impact on wildlife, impact on character of the area, disproportionate amount of development proposed in Worplesdon ward
- Land north of Slyfield Industrial Estate (Site 63) - impact of additional traffic, impact on surrounding residents, increased noise and light pollution
- Community football ground at Gunners Farm and Bullens Hill Farm (Site 64) – there is some support for the proposal especially if supporting infrastructure is provided and it is for the whole community, those objecting are concerned about increased traffic, parking issues, increased noise and light pollution, impact on the SPA and wildlife
- Secondary school north of Saltbox Road (Site 65) – impact on congested roads, constrained by railway bridge, impact on the Special Protection Area (SPA)

#### **New settlement – former Wisley airfield (Site 66)**

- The surrounding local and strategic road network is already congested
- Loss of Green Belt
- Existing services and facilities would not be able to cope with increased demand
- Loss of agricultural land
- Limited opportunities for sustainable modes of transport – people will be reliant on the private car
- Impact on the SPA

#### **Around villages**

- Object to the loss of Green Belt – exceptional circumstances not demonstrated
- Additional development will exacerbate congestion issues on local roads, many of which are narrow
- Limited access on or off the A3
- Existing services and facilities such as schools, doctors, sewage infrastructure, parking and rail network is at capacity and cannot support additional development
- Redevelopment of Howard of Effingham School and associated land (Site 69) - do not consider that there is a need for the Howard of Effingham expansion and additional development will lead to merging with Bookham

- West Clandon school site (Site 77) – impact on local roads, highway safety and inadequate access, impact on listed building, flooding issues
- Many sites experience flooding and development on them may increase flooding elsewhere
- Scale of development in most cases is not proportionate to the size of the village – this would harm their rural character
- Loss of agricultural land
- Should be directing development towards brownfield sites

### **Previously developed sites in the countryside**

- This section attracted a small number of comments – a mixture of support and noting of constraints
- Impact on views and AONB at Mount Browne (Site 82)

### **Traveller and Travelling showpeople accommodation**

- Responses mainly focused on land at Home Farm – Effingham (Site 89), Green Lane East – Normandy (Site 92), Roundoak – Wood Street Village (Site 95), Four Acre Stables – Normandy (Worplesdon ward) (Site 96), Garages at Send (Site 99)
- Send (Site 99) - site unsuitable, contrary to Planning Policy for Traveller sites (PPTS)
- Home Farm (Site 89) should retain its Green Belt status and provide six rural exception pitches
- Normandy sites / Roundabout – village boundary being extended to incorporate traveller pitches that were meant to be temporary, no exceptional circumstances – not supported
- Positive discrimination for Travellers that does not apply to settled community
- Disproportionate distribution across borough

### **Land for Cemeteries**

#### Site 102

- No need as plenty of provision elsewhere and burials decreasing as cremation more popular
- The A322 Worplesdon Road is narrow and not safe for more traffic
- Potential for contaminating water as high water table
- Guildford Borough Council Parks Service considers the site viable for a burial ground

#### Site 103

- Normandy area needs more burial land
- Potential for contaminating water as area floods
- Guildford Borough Council Parks Service no longer considers the site viable for a burial ground

### **Allotments**

- Overall support for the sites
- Allotments allow for the wellbeing of communities and a reduction in food miles

### **Suitable Alternative Natural Green space (SANG)**

- There is no evidence that the SPA Strategy is working
- Common land should not be used as SANG

- Russell Place Farm (Site 112) is not needed in Wood Street Village and will enable Green Belt development
- Tyting farm SANG (Site 115) will lead to congestion, lack of safety, litter, would ruin the countryside
- Wisley SANG (Site 116) would draw people to the SPA, would not mitigate the impact of the Wisley development on the SPA
- Burpham Court Farm SANG (Site 117) floods every year

### **Safeguarded land**

- Roads, services and facilities are unable to cope with additional development
- A number of the sites have flooding/drainage issues
- Clay Lane Link Road (Site 121) is inappropriate as it crosses the flood plain and would increase traffic in the local area

### **Questionnaire**

#### **Question 1: The evidence base**

See appendix C

#### **Question 2: National Policy and guidance**

- Predominant feeling that the document was not compliant and failed to meet the NPPF test of soundness:
  - Positively prepared – The objectively assessed need has not been determined and is still being challenged, the SHMA is incomplete and there is a lack of evidence surrounding infrastructure
  - Justified – Application of constraints has not taken place and therefore a strategy suitable and appropriate for Guildford has not been determined nor have reasonable alternatives been considered;
  - Effective – To date, the duty to cooperate work is insufficient and in particular does not consider the cumulative impact on infrastructure from neighbouring boroughs;
  - Consistent with national policy - The treatment of Green Belt has not been done in accordance with the NPPF and exceptional circumstances have not been demonstrated.

#### **Question 3a: Sustainability Appraisal (SA)**

##### **General**

- Not transparent, thorough, nor does it justify the draft Local Plan
- Too complex for a lay person to answer
- Publishing the SA halfway through consultation period gave insufficient time to consider it
- Unclear how it has informed the draft plan
- Disproportionate emphasis on economic growth to detriment of environment and society
- Over 20 per cent increase in homes, 57 per cent on greenfield land will harm environment
- No scenario of brownfield land only was tested
- Flawed data so the conclusions of the SA cannot be relied on (examples given)

### Detailed feedback responses: Statutory Consultees or Environmental Bodies

- Natural England disagrees with SA's conclusions
- No agricultural soil assessment carried out to show lower grade farm land has been selected
- Developers should commission Agricultural Land Classification (ALC) survey for potential sites
- No evidence how nearby roads will cope with traffic from Site 66 Former Wisley airfield
- The Environment Agency generally agrees with the SA

### **Question 3a: Habitats Regulations Assessment**

- Too much emphasis has been placed upon the use of SANG to mitigate the effects of development. It is felt that there is no evidence to demonstrate that SANG works.

### **Question 4: The Local Plan Vision**

See 'Our vision and ambition' section above

### **Question 5: The key diagram**

- The key diagram does not represent the key aspects of the draft Local Plan
- There is not enough detail in all areas
- The key diagram is over complex and does not show the spatial strategy
- Make the diagram bigger, clearer and easier to understand
- Add site names and a diagrammatic key
- The development areas in the town should be clearer

### **Question 7: Any other questions?**

- Evidence base is subjective, incomplete, inaccurate
- There is nothing to show that the constraints have been taken into account
- The policies are poorly worded and unenforceable
- No one supports the plan
- The Council is not listening to the public
- Good work communicating and consulting on a difficult project
- The draft Local Plan is incomplete and seems rushed, for instance the infrastructure schedule