

By email to: localplan@guildford.gov.uk

24 July 2017

Dear Sir or Madam

London Green Belt Council response to Guildford Borough Council's revised Proposed Submission Local Plan: strategy and sites June 2017

Thank you for the opportunity to respond to this important consultation.

The London Green Belt Council is a grouping of over 90 organisations representing over 50,000 people with a concern for the London Green Belt including CPRE Surrey and the Guildford Society

We consider Guildford Borough Council's revised Proposed Submission Local Plan to be unsound because it is not consistent with National Policy, sustainable or justified.

We strongly object to proposals to release Green Belt land on the following grounds:

- **The Green Belt sites proposed for development still meet the requirements as set out in the paragraphs on Green Belt purposes in the National Planning Policy Framework (NPPF) and their removal would compromise the integrity of the London Metropolitan Green Belt.**
- **Notwithstanding the changes made to the Local Plan since the 2016 consultation, proposals to release large areas of Green Belt for development are inconsistent with the NPPF and with stated Government policy, as stated by the Secretary of State for Communities and Local Government.**

The following points outline the reasons why we consider the Proposed Submission Local plan to be unsound and relate to the following policies:

- A25: Gosden Hill Farm
- A26: Blackwell Farm
- A35: Former Wisley Airfield
- A43: Garlick Arch
- A43a: Land for new north facing slip roads to/from A3 at Send Marsh/ Burnt Common
- E4: Surrey Research Park
- H2: Affordable Homes
- P2: Green Belt

1. **The plan is inconsistent with the NPPF.**

1.1 **Guildford Borough Council has still failed to prove that the benefit of releasing land within the Metropolitan Green Belt area outweighs the harm.**

Notwithstanding the changes made to the revised plan, it is quite clear that the harm of removing Green Belt land which strongly meets Green Belt criteria in paragraph 80 of the

NPPF considerably outweighs any benefits. Guildford Borough Council has failed to take account of the significant harm of releasing Green Belt for development, despite there being a clear environmental and social impact for both the residents of Guildford Borough Council and neighbouring authorities.

Paragraph 44 of The Planning Practice Guidance states that:

'The Framework is clear that local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, or specific policies ... Such policies include ... land designated as Green Belt'.

<http://planningguidance.communities.gov.uk/blog/guidance/housing-and-economic-land-availability-assessment/stage-5-final-evidence-base/>

1.2 Proposed Green Belt development undermines the Green Belt's purposes, in particular, checking unrestricted urban sprawl, preventing the merger of neighbouring towns and assisting urban regeneration.

Guildford Borough Council's revised Proposed Submission Local Plan proposes to build in excess of 7000 homes on Green Belt land, approximately 58% of its total housing target. The proposed urban extensions at Blackwell Farm (Policy A26) and Gosden Hill Farm (Policy A25) are on sites particularly vital to prevent urban sprawl and are of strategic importance to the Metropolitan Green Belt in its entirety. These sites also include high grade agricultural land as well as land significant for recreation which contributes to Surrey's iconic landscape including Hogs Back.

- Gosden Hill Farm (Policy A25)
This site performs all the functions of the Green Belt but particularly prevents the merger of neighbouring towns by separating West Clandon from the edge of urban Guildford. Notwithstanding the changes in the revised plan, the proposals would cause the coalescence of the two towns. Along with the proposal for on-slip and off-slips roads at Garlick's Arch (policy A43a), this would lead to continuous development from Send to Guildford.
- Blackwell Farm (Policy A26)
Blackwell Farm is of strategic importance for the whole of the Metropolitan Green Belt. It performs all five functions of Green Belt, and fulfils purposes 1, 3 and 5 very strongly. It clearly prevents urban sprawl to the West of Guildford and protects the countryside (including AONB) from incursion. Furthermore, the revised plan disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England's forthcoming boundary review.
- Land at former Wisley Airfield (Policy A35)
This land plays a significant role in curtailing urban sprawl. In rejecting previous planning applications on this site, Guildford Borough Council Planning Officers themselves stated that development would be inappropriate due to the impact on the openness of the land.

2. The Proposed Submission Local Plan is unsustainable

2.1. Focusing housing development on Green Belt land makes the Local Plan's affordable Housing Policy unachievable.

The changes in policy H2 Affordable Homes do not go far enough to address affordable or social housing need. By continuing to concentrate housing development on Green Belt rather than urban sites, the revised Proposed Submission Local Plan renders the 40% affordable target stated in the Local Plan's Affordable Homes Policy unachievable.

As mentioned in 3.2 below, the fact that Guildford Borough Council has failed to set higher densities for the urban area and has deleted all reference to "density for development" in its revised Local Plan means that the plan is out of step with current policy direction and is therefore unsustainable.

2.2 Development at Garlick Arch (Policy A43) would lead to the loss of rural employment

Notwithstanding the changes made in the revised plan, Policy A43 does not mitigate the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over nine years.

2.3. Development on Green Belt sites will increase traffic congestion, significantly impact on air quality and lead to flooding

The development proposed on Green Belt sites is dependent on large, uncommitted road building schemes; will have a detrimental impact on traffic volume and associated air quality as well as increasing flood risk.

- Gosden Hill Farm (Policy A25)

The volume of traffic will greatly increase air pollution by:

- Generating approximately 6,000 vehicles which will exit straight on to the already heavily congested road network;
- The linking of the A3100, B2215 and A247, channelling thousands of cars through the narrow, winding road through West Clandon;
- The proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common which would generate even larger volumes of on the A247 through Send and West Clandon.

- Blackwell Farm (Policy A26) and Surrey Research Park (Policy E4)

The development will heighten the risk of flooding and the volume of traffic will add to air pollution in neighbouring areas, which already exceeds safe EU limits for Nitrogen Dioxide as a result of:

- Damaging Hogs Back's function as a soak away for surface rainwater - development on Blackwell Farms slopes will cause water to travel north, adding to existing flooding in Wood Street Village, Fairlands and Whitmore Common;
- Directing more office space to an extended business park [Policy E4] which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas;
- ignoring independent expert traffic studies which show the impact of development at Blackwell Farm on the local network, questioning the viability of the development;
- removing Guildford's "green lung" on the slopes of the Hogs Back. In the UK, the prevailing winds are from the West. The open farmland to the west of

Guildford allows clean air to be blown into the town. If this area is urbanised, CO2 emissions and other pollutants will replace this clean air.

- Land at former Wisley Airfield (Policy A35)
This development would cause further harm to air quality both onsite and in the Cobham Air Quality Management Area due to the proximity to the severely congested A3/ M25 junction and Ripley village and roundabouts.

3. The Proposed Submission Local Plan is unjustified.

3.1. Green Belt should have been considered as a constraint when setting housing targets but, notwithstanding the changes made since the 2016 consultation, this has not happened.

The revised Proposed Submission Local Plan is not compliant with national policy as, notwithstanding the changes made since the 2016 consultation, it still does not take sufficient account of Green Belt constraints on development. The reduction in the housing target by just 1,434 from 13, 860 to 12,426 means that the changes do not sufficiently take account of constraint. This is in direct contrast to the Secretary of State's 2016 statement that Green Belt should be 'absolutely sacrosanct'.

Paragraph 45 of the Planning Practice Guidance clearly states that councils should take account of policies such as the Green Belt which indicate development should be restricted.

"Once need has been assessed, the local planning authority should prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period, and in so doing take account of any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need."

The government has also repeatedly made it clear that demand for housing is unlikely to be accepted as the exceptional circumstances needed to justify changing Green Belt boundaries for example in ministers' clarifications in letters to MPs, referring directly to the Local Plan preparation process: *"we have been repeatedly clear that demand for housing alone will not change green belt boundaries"* [Letter from Brandon Lewis to MPs 7 June 2016]. Guildford Borough Council is clearly justifying the release of Green Belt by arguing it is needed for housing, however as mentioned in 2.1, this is unsustainable in providing the housing needed and thus cannot warrant exceptional circumstances.

3.2 Local Plan revisions do not taken account of the policy intentions set out in the Housing White Paper, published following the original Regulation 19 consultation.

The Housing White Paper, published after the previous Regulation 19 consultation, made it explicit that Local Authorities must look at ALL alternatives before releasing Green Belt land including increasing density and making the most of available brownfield sites. Previous consultations show that Guildford residents would prefer to use brownfield land in the urban area first.

The revised Local Plan is thus unjustified because it fails to fully explore the many opportunities within the borough where there is no presumption against development which would mitigate the release of Green Belt land AND assist in urban regeneration.

- Densification

More effective use of current space would remove the need for new land.

- Urban densities in Guildford town are no higher than the villages that surround it despite the majority of villages being in the Green Belt and protected from development.
- Only 10% of the total housing proposed in the revised Local Plan is proposed in Guildford Town Centre. The fact that Guildford Borough Council has failed to set higher densities for the urban area and has deleted all reference to “density for development” in the revised Local Plan means that the plan is out of step with current policy direction and unsustainable.
- The existing Surrey Research Park is low density with just 65,000m² of office space over 27 ha. This land could be used far more effectively by providing office space on car parks and other mixed use development.
- If the plot-ratio in the approved Manor Park master plan was applied to the existing Research Park, six times as much office accommodation could be provided therein.

- Brownfield

- Guildford town has developed very little over the last 20 years and has not undergone the type of normal urban expansion, redevelopment of previously developed sites and increase in residential densities as nearby towns such as Woking.
- Sites by River Wey could be used to provide affordable accommodation where it is needed rather than unnecessary retail development. The Carter Jonas Guildford Retail Study Update 2017 lacks credibility and there is no proven case for expanding comparison retail space which is undermined by failure to implement existing retail consents at the North Street development over the last 10 years. The Guildford Retail Study does not take account of changing retail patterns in relation to the decline in high street retail due to the rise of internet shopping. The study also assumes a number of logged retail requirements from companies already in liquidation or with national requirements that exclude Guildford.
- The plan overlooks Bordon and Whitehill eco-town which is seeking high quality businesses to re-locate.

Moreover, the Housing White Paper also sends a clear signal to developers that they must build out permissions. The University of Surrey was permitted to remove 64 ha of land from the Green Belt at Manor Park in 2003 citing the need to build 5090 student and staff residences as exceptional circumstances. 14 years on, only one third of these have been built yet the university has claimed that students want to live off-campus, now referring to Guildford’s acute housing need as an exceptional circumstance to build on Blackwell Farm (Policy A26).

3.2 The proposal to extend Surrey Research Park onto Green Belt land at Blackwell Farm does not constitute exceptional circumstances

The excessive expansion of Surrey Research Park (Policy E4) onto Green Belt land at Blackwell Farm is not supported by the findings of the Employment Land Needs Assessment 2017. The current site is very low density and could easily be increased within its existing curtilage.

4. Proposed modifications.

- a. Revise housing targets to a more credible level, taking into account the Green Belt as a constraint to development. The London Green Belt council concurs with the Guildford Green Belt Group that a target of 4,000 homes would remove the need to build on Green Belt or open countryside, meeting the largest public objection to the plan as a whole.
- b. Instigate a more sustainable alternative to meeting housing need by following government policy to develop on previously developed sites in the urban area, many of which are owned by the Council.
- c. Include far more affordable housing to meet the need for young families and young people in the Guildford area.
- d. Impose a moratorium on any development proposed on University of Surrey Green Belt land until it has completed all the developments proposed in its 2003 Manor Farm proposal.
- e. Increase the Surrey Research Park plot ratio from 25% to 50% to keep development within the same footprint of the existing park without damaging its amenity.

Yours faithfully

Richard Knox-Johnston
Chair
The London Green Belt Council