

8th April 2019

Dear Councillor

Guildford – Local Plan the most important Council decision for a decade

The Guildford Society (GSoC) is writing this **open letter** to all councillors to ask that they defer adopting the Local Plan, on the 25th April, until it has been amended in several critical areas. We are not proposing rejecting the plan, as it represents the basis of a sound plan and a rejection requires the council to start the planning process again. We are seeking to see the plan modified to make it better and more effective which we believe is a shorter-term process.

Despite a large amount of effort by the council and a long running enquiry, the GSoC believes the plan, if adopted, will be fundamentally flawed and unsound. Although the planning system has been followed, the process has produced a bad plan for Guildford Borough. The plan, if implemented, will have a serious impact on the Borough adding housing in sensitive sites, destroying our countryside, leave the Town Centre at the mercy of badly planned piecemeal development, does little to address infrastructure issues (notably transport), and has limited provision to support commercial space requirements.

The plan can be amended to create a better balanced and more effective plan, we believe a delay is a small price to pay. We urge all councillors to defer approving the plan

Housing Numbers and Location

This was a subject of much debate at the plan enquiry. As a society we understand the reasoning for the base figure of 562 Dwellings per annum, but don't accept the gross overprovision of circa 35%, we note the overprovision is roughly equivalent to one of the Strategic Greenfield sites. The Local Plan appears to have accepted providing for the deficit in the Woking plan by default!!

GSoC thinks excess housing figures should not be adopted in the plan as it will lead to two results:

- a) Removes Greenbelt designation and other country side protection unnecessarily.
- b) Creates an opportunity for developers to build easily sites on green field, greenbelt sites in an ad-Hoc manner over time without the necessary infrastructure improvements including Schools and Health facilities.

Proposal - The strategic sites should be reviewed using updated sustainability assessments to determine if one or more can be dropped.

Use the Town Centre and Urban area effectively

The major growth in housing is predicted to be in five strategic sites mostly on Green Field sites, despite the plan explicitly laying down a policy of Brownfield first. (Policy S2).

Brownfield sites are considered difficult, by the council, to bring forward into the plan in a 5 year timescale. GSoC consider this argument is not born out by recent developments. Developers are showing considerable appetite for brownfield sites e.g. Student units in Walnut Tree Close, Solum, Casino Site etc. Using Brownfield sites in the Town Centre and Urban areas creates more sustainable development linked to existing facilities, provided infrastructure is also improved. Note that the strategic sites need major infrastructure investment to make them viable, these monies could be usefully used to unlock sites in the town centre whilst solving pollution and congestion issues.

GSoC believes that there is the capacity in the town equivalent to one of the Strategic Greenfield sites, rather than encroach on precious countryside.

It should also be noted that if Town and Urban sites are not identified, they will never be developed, and we will continue to encroach on Green Belt & Green Field Sites in future plan periods.

Proposal - The whole of the Town Centre, including Woodbridge Meadows, should be designated as a Strategic Site and managed as such

Town Centre

The plan is mostly silent on how Guildford Town centre should be developed – consisting of a series of piecemeal plots suggested for development. The recent Solum approval and the flurry of applications for Student accommodation along Walnut Tree Close show that the plan needs major strengthening. The current plan has a Policy S3 which GSoC considers needs major amendment. Stronger policies supported by a Development Management Plan would make managing applications such as the Casino Site far easier.

The proposed Town Centre Strategy/ Development Management Plan are still in development; why they were not prepared in parallel with the local plan is a mystery.

If, as proposed above, the Town Centre was managed as a Strategic site this would encompass creating proper spatial strategies, mass and scale policies, and properly link planning on major sites e.g. North Street and Bedford Wharf. This would also allow developers to have a clear specification of what a site should provide.

Proposal - Policy S3 needs amending to make it more effective together with supporting policies.

Proposal - The Town Centre Regeneration Strategy and Development Management Plan should be fast tracked.

Infrastructure Dependency

The plan depends on key Infrastructure improvements notably A3 improvements and Water/Waste management. Several policies are dependent on Grampian rules applying. The plan is not robust in linking development to infrastructure development. Several sites need explicit wording in the policy to prevent development until infrastructure is provided e.g. Gosden Hill must have committed to a Guildford East Station, A3 improvements, and water/sewage provision before building can start.

Proposal - Modify policies to ensure linkage to Infrastructure is put in place.

Economic Development

The plan has placed emphasis on retail development in the town centre until very recently. The plan is not clear on the provision of high quality flexible commercial space. Professional Services and High-Tech Businesses are dissuaded from Guildford due to transport issues, housing expense and lack of suitable premises. There are signs that Guildford is losing out to centres such as Reading. GSoC suggests we don't want town and borough just to be a dormitory area and the plan should proactively support business requirements.

Again, the Town Centre, which is liked by many High-Tech businesses, can be utilised provided there is proper spatial strategy. The promotion of flexible buildings should also be in the plan, it is noted some of the current planned Student Housing, by using prefabricated units, are unable to be converted to other uses.

Action: Ensure the spatial strategy is written effectively.

As a Councillor - What Can you do?

Whilst understanding Guildford Borough Council's desire to get the plan adopted, we recommend that councillors **defer** a decision on the plan, and request that the proposals outlined above are considered. GSoC would be happy to enter into dialogue on the details of our proposals.

Yours Faithfully

A handwritten signature in black ink, appearing to read "Alistair Smith".

Alistair Smith

Chair - The Guildford Society

CC

Parish Councils

Anne Milton MP (Guildford)

Surrey County Council - Leader