



BURPHAM COMMUNITY ASSOCIATION



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Burpham
Guildford
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18th July 2016

Local Plan Consultation Team
Guildford Borough Council
Millmead House
Millmead
Guildford GU2 4BB

Dear Sir/Madam,

Response to Guildford Borough Council Draft Local Plan

I write on behalf of the Burpham Community Association (BCA) to register our objection to the Draft Local Plan. It is fundamentally unsound, unsustainable and unworkable. Our objections to specific matters within the Draft are set out below.

We have read and endorse the responses from the Burpham Neighbourhood Forum, the Guildford Residents Association, the Merrow Residents Association and the Campaign to Protect Rural England.

Policy S1 Presumption in favour of sustainable development

We object to this policy which presumes sustainable development in line with the NPPF. It is our contention that the proposal to build 13,860 homes across the Borough is not sustainable. The policy fails to recognise that rural areas with inadequate road and other infrastructure cannot cope with development on this scale and is therefore unsound.

NPPF 10 notes that *"plans and decisions need to take local circumstances into account so that they respond to the different opportunities for achieving sustainable development in different areas."*

Policy S1 says: *"We will work proactively with applicants jointly to find solutions that mean that proposals can be approved wherever possible and to secure development that improves the economic, social and environmental conditions in the area."*

There is a subtle shift of emphasis from the NPPF's **"need to take local circumstances into account"** to GBC's **"proposals can be approved wherever possible."**

There are twelve planning principals outlined in the NPPF which the Local Plan should take into account. Some seem to be disregarded, for example:

"...take account of the different roles and character of different areas, promoting the vitality of our urban areas, protecting the Green Belts around them, recognising the

intrinsic character and beauty of the countryside and supporting thriving communities within it."

"...support the transition to a low carbon future."

"...contribute to conserving and enhancing the natural environment and reducing pollution"

"...encourage the effective use of land by reusing land that has been previously developed (brownfield land) provided it is not of high environmental value."

These values do not sit easily with the proposed strategic developments.

Another statement from Policy S1 gives serious cause for concern.

"Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in adopted neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise."

This offers a degree of flexibility that is tantamount to offering carte blanche to developers, and the presumption in favour of applications fails to recognise any constraints such as the Green Belt.

Policy S1 looks to securing *"the economic, social and environmental conditions in the area"* but fails to acknowledge the conflict that can often occur between economic growth, environmental protection and social justice. There are difficult decisions to be made but no guidance is given as to how dissension might be resolved.

This policy reveals a distinct bias towards development – one might almost add **at any price**. References to sustainability are nebulous, and inconvenient constraints are swept aside. Perhaps the most shocking omission is the lack of commitment to uphold Green Belt boundaries.

Policy S2 Borough Wide Strategy

We object to the proposal to build 13,860 homes in the Borough over the period of the Plan for the following reasons:

- The figures are from the SHMA but we are not privy to the calculations used to derive the required housing need of 693 dwellings per annum (dpa). The consultants who prepared the SHMA claim intellectual ownership and, despite FoI requests, the details remain hidden. We are told to trust the model because many other local authorities use it, a specious argument. GBC have presumably taken the report on trust which suggests a degree of naivety. There is significant concern, too, that the consultants' website indicates an agenda that is clearly pro development.
- The OAN is 693 dpa but there is no Housing Target within the Plan. GBC seem to suggest the two are the same, that the OAN is deliverable and cannot be gainsaid. However, we understand that deliverability may be affected by various constraints. How can we be asked to approve a plan that does not actually propose a realistic target number that takes all constraints into account?
- An independent report by NMSS, commissioned by Guildford Residents' Association (GRA), has arrived at a much lower OAN of 510 dpa. This report finds that the SHMA inflates the OAN due to

- a) failure to correct historical data
- b) issues with the way student needs are considered
- c) flaws in the estimation of homes needed to support job growth.
- Other boroughs such as Woking and Waverley have applied constraints to overall housing growth, Guildford has not. There seems to have been little effort to protect the character of either urban or rural aspects of Guildford, already a very congested gap town. The unique identities of villages like Send, Ripley and Clandon are threatened with being lost as a result.
- There is a disproportionate level of expansion in the northern part of the Borough. This will impinge particularly on Burpham which would cease to be a definable village and diminish to just the name of an area within the urban sprawl of Guildford. The planned development of Gosden Hill Farm offers the second largest number of homes, a new railway station, a Park and Ride, shops and primary/secondary schools, all situated in the Green Belt that includes an area of ancient woodland.

It is our contention that these deficiencies render the Local Plan unsound.

Policy P2 Green Belt

We object to this policy. The Metropolitan Green Belt constitutes 89% of the Borough and should be at the heart of all planning concerns. It is not merely a space separating urban areas but a vibrant community in its own right – home to agriculture, tourism and leisure activities. It provides biodiversity, beauty, wide rural views – all essential for physical and psychological wellbeing. It plays a vital rôle in water management and flood control. And it is not the personal fiefdom of Guildford Borough Council but belongs to the wider community, including London, and should be regarded as a national asset and a legacy for the future. Once the Green Belt is lost it is lost in perpetuity.

It is reasonable to expect some development but it should be proportional; a village that has 1% of the total number of homes in the Borough should not be expected to accommodate more than 1% of new homes. The demands on infrastructure would also be proportional, and settlements would be more likely to retain their character.

Policy P2 seeks to impose strategic development in the Green Belt, despite government commitments to protect it.

The NPPF states

“.....the essential characteristics of Green Belts are their openness and their permanence.....new Green Belts should only be established in exceptional circumstances.”

Brandon Lewis, the then Minister of State, said

*“{the NPPF}... makes it clear that inappropriate development may be allowed only where very special circumstances exist and that Green Belt boundaries should be adjusted only in exceptional circumstances through the Local plan process **and with the support of local people**. We have repeatedly made clear that demand for housing alone will not change Green Belt boundaries.”*

This Local Plan proposes covering large areas of the Green belt with housing estates – 8,086 homes are planned as opposed to 1,135 for the urban area of Guildford, a huge imbalance.

Urban regeneration, the use of brownfield sites, homes in the town centre rather than the proposed 40% increase in retail space that flies in the face of retailing trends, more student accommodation on campus – these should be utilised before summarily dumping blocks of housing onto a precious resource.

Policy E7 Guildford Town Centre

We object to this policy as we feel that more residential use should be made of the town centre. Independent research suggests a fall in demand for retail space – there is enough visible evidence of empty shops in High Streets – and no account seems to have been taken of the increase in online shopping.

The Guildford Retail and Leisure Study 25 September 2015 states *“Town centres, once the principle focus for retail and leisure are now increasingly under threat.”*

Proposing a 40% increase in retail space seems perverse; better surely to concentrate on high quality enterprise that reflects Guildford’s heritage and prioritise brownfield development for imaginative housing. This would take pressure off the Green Belt. The NPPF clearly states that Green Belt serves a key purpose, *“to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land.”*

Transport Evidence

We have serious misgivings about the reliability and viability of much of the evidence.

- The Strategic Highway and Assessment Report (SHAR) has been produced late and is unfinished. Vital information about traffic congestion – how much will occur and where – has not been given in time to inform Plan proposals or responses. It would appear that the proposal to build 1000+ homes on Slyfield will not generate any additional traffic; omissions like this undermine the Plan and render it unsound.
- Too much emphasis is placed on replacing cars with bus and cycle use. An increasingly elderly population is far more likely to use cars than rely on an uncertain bus service; the disabled and infirm, parents with young children, people wanting to shop for bulky items are all more likely to use cars. This needs to be acknowledged.
- The proposed Sustainable Movement Corridor (SMC) cannot be delivered as the roads are too narrow and have pinch points. This certainly applies to Burpham. The A3100 London Road will become an SMC supposedly carrying north and south bound bus and cycle lanes in addition to general traffic lanes north and south bound; four lanes of traffic where only two exist at present. This suggests that someone engaged in a paper exercise without making a site visit armed with a tape measure, an unsound practice that will have a deleterious effect on our community.
- There are major traffic issues that are not resolved. Guildford suffers from the constraints of a gap town yet there is little information about how traffic will be organised to cope with this – will there be new town bridges, a central bus interchange, and is a tunnel to carry through traffic considered a viable proposition?

- The cumulative effect of the developments proposed in the Plan look set to increase congestion, so the comment that they would have *“an acceptable impact on the capacity of the highway networks in terms of the policy text set in paragraph 32 of the NPPF”* is questionable. There is no objective for reducing congestion in the Local Plan just a statement about opportunities to *“improve the performance of the road networks through transport infrastructure service improvements.”* This is aspiration, not a detailed exposition of how a sensible outcome is to be achieved.
- It is unsound to publish a Draft Local Plan without a clear view of the essential issues of road infrastructure and transport. There are indications that road improvements will be undertaken but they are vague and dependent on as yet unpublished proposals by Surrey County Council and Highways England.

Policy A25 Gosden Hill Farm

This proposes a development of 2000 homes, eight traveller pitches, employment and retail space, community services, two schools, a Park and Ride for up to 1000 vehicles and a railway station at Merrow. It is the one specific scheme that will have most impact on Burpham and our immediate neighbours and we strongly object to it for the following reasons:

- The proposal will put thousands more vehicles on to already very congested roads.
- Access to the development is by a new A3 southbound off/on slip road north of the current slip road to Burpham and Merrow which will become two way. This means that **all** the traffic from Gosden Hill Village and the Park and Ride wanting to access the north bound A3 or the B2234/A25/A246 will have to travel through Burpham. The SHAR admits that there will be an increase in traffic through Burpham and there will be pressure on the A3100/B2234 roundabout. This is already a notorious pinch point, jammed to the point of gridlock at peak times. We hear much of the cost to business caused by congestion, yet this Plan seeks to compound Burpham’s traffic problems.
- The new junction will be 1.8km from the southbound on slip at Burnt Common, thus failing to meet Highways England requirements of 2km between on-then-off junctions.
- The policy notes *“Any proposals for the development of this site should have regard to the potential opportunity to provide an all movements junction of the A3 trunk road with the A3100 London Road, the B2215 London Road and the A247 Clandon Road. This could form part of the proposals for Highways England’s emerging A3 Guildford scheme for which construction is anticipated to commence in Road Period 2 (2020/21 to 2024/25) as required by the department for Transport’s “Road Investment Strategy.”*

Words like *“should ...potential... could... anticipated”* are conditional; any development of this magnitude requires a firm commitment to provide all the necessary infrastructure. The original 1984 proposal shows a four way junction which is essential if this development is to be realised. Furthermore, a decision has to be made about the possibility of constructing a tunnel before any development on Gosden Hill. It would be short-sighted in the extreme to build homes and all of the associated infrastructure on the most suitable land for a tunnel entrance.

- The developer is required to provide the eastern route section of the Sustainable Movement Corridor. We have already noted the impracticalities of fitting four traffic lanes in narrow roads with pinch points. If SMC 6 is instigated in its present form then running Park and Ride buses through Burpham will add to the congestion and exacerbate pollution levels.
- There is no reference to the proposed railway station in the Wessex Plan for future rail development. We note, too, that in 1984 GBC discounted the idea as they felt it would mean Gosden Hill becoming a dormitory estate for London rather than an estate for local housing need.
- The policy requires “*green corridors and linkages to habitats outside of the site and the adjoining SNCI*” It should be noted that the owner of the land, who is also the potential developer, objected to local green spaces and wildlife corridors adjacent to this site. (Burpham Neighbourhood Plan)
- There is a requirement in the policy to reduce surface water flood risk through appropriate mitigation. Burpham is recognised as a flooding “hot spot” and we consider it essential that a full hydrological survey be carried out before any development is contemplated.
- There is a contradiction in the requirement for a secondary school. A proposal is put forward for a primary and secondary school, but in the infrastructure section it states that the need for a secondary school will be determined at the planning application stage. This dichotomy needs to be resolved because if no secondary school is needed, the size of the development can be reduced.

In 1982 the first application to develop Gosden Hill was made. It was held that such a proposal

- would conflicted with Green Belt policy,
- was an undesirable intrusion of residential development into a rural area,
- would cause the loss of good quality rural land,
- offered insufficient infrastructure.

How interesting to note that these were some of the reasons Guildford Borough Council gave when refusing the application. The BCA contend that they are still valid.

Conclusion

The Draft Local Plan is a long and complex series of documents, very difficult to master and virtually impossible for the concerned average reader to access in order to make a considered and informed comment. This has been compounded by the last minute release of new (and incomplete) documents on transport infrastructure.

The website is not easy to use, especially for people not over familiar with reading documents online. At times it is difficult to locate the haystack, never mind find the needle. How can proper consultation be undertaken if residents cannot easily and simply find out what their council is proposing? In our opinion this is a very serious shortcoming which is complicated by the appalling presentation. Clear readability needs dark font on a light background yet vital policy text is printed in white font on a coloured background.

Burpham is a pleasant place to live - though on the edge of urban Guildford, it has a village feel, bounded to west, north and east by green fields and woodland. If all that is put forward in the proposed Submission Local Plan goes ahead, our community will suffer dreadfully. It will lose its identity and become no more than a name in the middle of urban sprawl. Without sensible infrastructure changes, particularly in relation to Guildford's unresolved traffic problems and most notably a decision on the siting of a tunnel, Burpham will degenerate into a giant roundabout. It will be reminiscent of an inner city gridlock akin to the Elephant and Castle in London that will frustrate future attempts at any rational resolution. How can this be considered sound and sustainable?

Yours faithfully,

Liz Critchfield
Secretary
Burpham Community Association