



**Campaign to Protect
Rural England**
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CPRE GUILDFORD DISTRICT RESPONSE GUILDFORD BOROUGH LOCAL PLAN STRATEGY AND SITES ISSUES AND OPTIONS

CPRE Surrey welcomes this opportunity to take part in this important consultation on Guildford's future. We want to make a positive contribution to the development of a plan for the borough which embraces change where it is required, whilst ensuring that the unique character of both town and countryside is protected and enhanced. We recognize that the opportunity for growth depends first on meeting the challenge of an infrastructure which is in severe difficulties. We understand that there is now no time to prepare the master plan for the town that is really required, which makes it all the more essential to avoid development decisions under governmental pressure which are unsustainable and will be regretted by this and future generations. This is a heavy responsibility which requires the community to work together and avoid division as far as possible through any sense that objective balance and fair judgement have been lost. We believe that there is a real danger of this happening because much of the "evidence" prepared for this consultation is flawed and the "Issues and Options" document concentrates too much of its attention on housing and too little on other community priorities.

1. HOW DO WE DEFINE SUSTAINABILITY?

We are concerned that commonly used terms in planning are often not defined correctly or understood properly. In 2012 the Government stated the definition we must all use for sustainability is "meeting the needs of the present without compromising the ability of future generations to meet their own needs". This was the wording agreed internationally by the United Nations General Assembly. To do this would require:

- Living within the planet's environmental limits (ie not destroying valued irreplaceable assets and accepting capacity limits when considering housing)**
- Ensuring a strong, healthy and just society**
- Achieving a sustainable economy (not just growth)**
- Promoting good governance (working with the community)**
- Using sound science responsibly.**

This definition is in the 2012 National Planning Policy Framework (NPPF). It is a whole integrated package which includes community engagement, an inclusive society, applying

Green Belt policy, and affording the highest protection to Areas of Outstanding Natural Beauty (AONB).

The Green Belt and Countryside Study (GB&CS) was published before the 2012 NPPF definition of sustainability had been made public. It therefore promotes the corrupted concept of sustainability as meaning “close to existing infrastructure”.

If GBC wants to promote sustainability then it must embrace a wider vision of how we develop without compromising Guildford for future generations. This will include :

- Deciding what are our irreplaceable assets such as AONB, ancient woodland, great landscapes, and heritage features including the river**
- Ensuring that character, community identity and distinctive architecture are protected**
- Providing clean air and water, and limiting noise disturbance and light pollution**
- Reducing and managing traffic impact by investigating how to improve public transport**
- Protecting and enhancing open countryside and places of recreation with easy access.**

2. WHAT ARE THE CONSTRAINTS ON GUILDFORD?

Whilst we have to recognize some growth may be required, we also have to accept that there are capacity limits that apply for the county town and borough which are not comparable elsewhere. Here is a list of what CPRE believes have to be taken into account as priorities when deciding on future development :

- The topography of a gap town with a river, rail and roads running through it**
- The flood plain, water supply and waste treatment**
- Special Protection Areas such as the Thames Basin Heaths**
- The Surrey Hills Area of Outstanding Natural Beauty and of Great Landscape Value**
- The Metropolitan Green Belt and the proximity of London**
- Ancient Monuments and listed and heritage buildings**
- Sites of Special Scientific Interest (SSSI) and Nature Conservation Importance (SNCI)**
- Registered Commons such as at Effingham**
- Ancient woodlands**
- Agricultural land for farming of all kinds**
- Ministry of Defence land**
- National Trust properties, historic gardens and the Wey Navigation**
- Archaeological sites of importance and potential**
- Main traffic arteries such as the M25, the A3 and the A31**
- The National Grid and solar panels and wind turbine policy**
- Network Rail connections including the North Downs line**
- Other utilities including the Royal Mail, BT, and Broadband**
- Road and rail congestion from commuter travel to and from the town**
- Hospital, school and university infrastructure and traffic**

3. WHICH COMES FIRST A MASTER PLAN, INFRASTRUCTURE OR HOUSING?

CPRE wants a positive outcome from this consultation. We are concerned, however, that there is not enough time for a proper master plan to be drawn up for the town and borough. Accordingly, we consider that there is a danger that any proposed development will be of a piecemeal nature dictated by expediency and financial priorities rather than good planning and design. This is caused by the time pressure applied by the government with their current single track emphasis on housing targets. Guildford deserves better than this. The problem is that the town and borough cannot absorb more housing without immediate attention to its infrastructure. More housing will only make road traffic congestion worse, school overcrowding more severe, and overwhelm the hospital and other medical services.

CPRE played a role in the campaign to put a tunnel under the Devil's Punchbowl at Hindhead. This has been acknowledged to be a great success even by its former opponents. We pointed out that the A3 would in future be blocked in Guildford instead, which is exactly what has happened. Channelling through traffic under the town by use of a tunnel would have a major impact on congestion and additionally would improve the urban environment enormously as noise disturbance and light pollution would be reduced. The problem is when will the Highways Agency (HA) give this attention and how do we raise the money for this long term solution?

The HA state that 80% of the network is wearing out and coming up for major maintenance/renewal over the next 5 years. The HA plan to issue draft strategies for consultation in January 2014 when the SE will bid for a share of the national 5 year Highways Budget of £15.1 billion. Evidence of the infrastructure difficulties faced by Guildford need to be presented now to the Minister. Can we be confident from past experience that our need for upgrading the A3 and the M25/A3 junction will be heard? Is the proposal for a tunnel costing an estimated £1 billion realistic?

The HA is aware of other problems such as noise and the need to replace concrete surfacing with modern tarmac, air quality problems and new vehicle emission legislation, the excessive cost of lighting, and the knock-on impact of motorway congestion problems on Surrey roads like the A25. It appears to be unrealistic for the "Issues & Options" document to try to suggest that we can build our way out of trouble with new housing when there is no assurance that essential road improvements are likely to take place. It would surely be a huge mistake to go for growth when the whole electorate knows that our infrastructure is in difficulties.

CPRE is concerned about the GBC Background Paper entitled "How Many New Homes?" which was published in October. We realize that this is a technical paper outside the consultation but we feel obliged to comment on it as it is presumably designed to inform and contribute to the community debate. We would first of all like to draw your attention to some current population density figures per km² that we have obtained:

+ UK	262	(in 2010)
+ England	401	(in 2010)
+ Sussex	425	(in 2011)
+ Surrey	683	(in 2011)

Our information states that the UK is the third most densely populated country after Holland and Belgium, two countries which have an area together approximately equivalent to the South East of England. If a comparison was made between them and the SE, one would certainly anticipate that the SE would have a far greater population density but nothing like as good an infrastructure in terms of roads, rail, schools, hospitals or even cycle tracks! The same source predicts the future population densities for England as follows:

+ England	430	(in 2020)
+ England	504	(in 2050)

These figures for 2010 to 2050 are derived using 2008-based national population projections.

From this it can be seen that Surrey is already one of the most densely populated counties in England (as well as being the most overflowed). No doubt those responsible for drafting the Local Plan will have comparable figures for London and the South East. The point is that

Surrey is being expected to take a disproportionate amount of housing compared to other parts of the country regardless of its capacity limits for development.

We agree with the Guildford Residents Association (GRA)'s statement that "housing growth at a level much above 300 homes per year would be unsustainable and harm the character of our constrained gap town."

4. AREAS OF OUTSTANDING NATURAL BEAUTY (AONB) AND OF GREAT LANDSCAPE VALUE (AGLV)

CPRE was astonished to discover that the Strategic Housing Land Availability Assessment (SHLAA) contained a range of sites which were within an AONB designation. Paragraph 115 of the NPPF states on page 26 that "great weight" should be given to Areas of Outstanding Natural Beauty "which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas".

With this clear statement of national policy in mind, it seems to us unacceptable for GBC to write to AONB landowners enquiring whether they would be prepared to sell their land for development. The effect of this has been to cause AONB agricultural land to rise in value enormously as a result of its apparent new potential for housing. It has also led to uncertainty in the adjacent property market which has been blighted by this unexpected change.

There is a lack of clarity now about the area covered by the Surrey Hills AONB which extends to about a quarter of the county. The whole of the AONB is overlapped by the county designation of AGLV and is within the Metropolitan Green Belt. The AGLV extends beyond the AONB so that the combined area of countryside that is protected amounts to one third of the county.

The Surrey Hills was one of the first AONBs designated in the country in 1958. The boundaries of the AONB are long overdue for review and Natural England has a duty to implement this task. Of the 35 AONBs in England, the Surrey Hills has been chosen as one of the only two across the country where this work is to be carried out as a priority. A preliminary evaluation has been completed to assess some of the areas of search to be considered.

It is anticipated that the Surrey Hills AONB will be extended to absorb those parts of the adjacent AGLV countryside which are evaluated as equivalent in quality to the AONB itself. In the interim, it is the policy at the Surrey Hills Board to treat AGLV land in the same manner as AONB. In these circumstances, CPRE fails to comprehend why so much AGLV land has been selected for potential development in the "Issues & Options" document.

CPRE further considers that the principles laid down by the NPPF for AONBs precludes "insetting" and boundary adjustment of the kind envisaged by the "Issues & Options" document. It is our understanding that neither the Surrey Hills AONB board nor Natural England were advised in advance of the boundary adjustments proposed.

CPRE objects in principle to proposals for development of AONB land. The following list gives details of those sites that are associated with "Issues & Options" and GB&CC documents:

+the land parcel E22 along Merrow Down between the Golf Course, Downside Road, Little Warren Close, One Tree Hill Road and White Lane: CPRE objection.

+the land parcel E 23 between Pewley Down, Holy Trinity School, Pewley Way, St Lukes,

Warren Road, OneTree Hill Road and Longdown Road: CPRE objection
+Site Information Sheet 23 Mount Browne (Surrey Police HQ): any development that extends beyond the footprint of the existing buildings would be opposed by CPRE
+Site Information Sheet 36 Land to the SW of Guildford-this is land at Blackwell Farm, Hogs Back: CPRE objection
+Guildford College of Law mentioned on page 68 of the Local Plan Strategy and Sites; no Site Information Sheet is apparently available: any development that extends beyond the footprint of the existing buildings would be opposed by CPRE

5. DEFENDING THE METROPOLITAN GREEN BELT

The repeated references to the extent of the Metropolitan Green Belt in Surrey seems to suggest somehow that this is a “weakness” to be deplored rather than a “strength” that is absolutely appropriate for some of England’s most beautiful and nationally important countryside. The extent of the Green Belt is required because of the proximity and threat of London’s urban sprawl, and the need to protect the county’s towns, villages and countryside against encroachment, linear development and coalescence.

The NPPF indicates its policy in the whole of chapter 9 under the significant title of “Protecting Green Belt”. This makes clear that “The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land open; the essential characteristics of Green Belts are their openness and their permanence.”

The 5 purposes of the Green Belt are given as:

- To check the unrestricted sprawl of built-up areas
- To prevent neighbouring towns merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns (such as Guildford)
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

This approach seems to be in complete conflict with the preparation of the evidence base and proposed policy presented in the “Issues & Options” document.

Account must be taken of recent Ministerial statements such as:

“Inappropriate development in the Green Belt should not be approved except in very special circumstances. Having considered recent planning decisions by councils and the planning inspectorate, it has become apparent that, in some cases, the Green Belt is not always being given the sufficient protection that was the explicit intent of Ministers.”

“The Secretary of State wishes to make clear that when considering planning applications, although each case will depend on its facts, he considers that the single issue of unmet demand, whether for traveller sites or for conventional housing is unlikely to outweigh harm to the Green Belt and other harm to constitute the ‘very special circumstances’ justifying inappropriate development in the Green Belt”.

The Parliamentary Under Secretary of State (Planning) has stated in a letter to Anne Milton MP that “the Government attaches great importance to the Green Belt, the fundamental purpose of which is to prevent urban sprawl by keeping land permanently open. Most development is inappropriate in the Green Belt and should not be permitted other than in very special circumstances. Green Belt boundaries should be revised only in exceptional circumstances through the preparation or review of the area’s Local Plan, a process

involving extensive public consultation". We do not believe that the document under review can justify its suggestion that very special or exceptional circumstances apply for any of the sites proposed.

Many local Surrey MPs have made clear that destruction of the Green Belt on the scale envisaged by the "Issues & Options" document is not acceptable and have spoken out on this matter during this month. There is no room for compromise here. The Green Belt has proved itself to the public over many years as a highly successful democratically agreed piece of legislation. It is part of the heritage of this country and not negotiable.

CPRE remain absolutely convinced that the GB&CS Study is fundamentally flawed and that the scoring system is wholly suspect with regard to such aspects as countryside encroachment. Pegasus has lost sight of the objectives of the Green Belt (and even the AONB) whilst following their method of approach. Their remit from GBC seems to be to find development land regardless of any other policy priorities in order to somehow persuade the Inspector that all possibilities have been explored. It should be noted that they were instructed to identify green field sites as a priority for development rather than previously developed land. In the process they have lost all credibility for objective judgement outside the circle of developer clients with which they are normally concerned.

There remains the problem of how to define the words "very special circumstances" and "exceptional circumstances". This has not been a problem in the past but now seems likely to become an area of confrontation along with the definition of "openness" and "permanence". The general public has a good understanding of what is meant by these terms within the context of the Green Belt but this is not reflected in the documents under consultation.

6. QUESTION & ANSWER SECTION

Q1

We have major reservations about Appendix B. We do not consider the Green Belt a weakness but a strength.

The analysis made does not adequately describe this very special borough and its potential. There are many surprising omissions.

A bare statement of facts under Population and Geography does not do justice to the character, heritage, topography and identity of the town and the exceptional countryside which is such a feature of its surroundings.

We would draw your attention to the Guildford Residents Associations (GRA) response which gives a much more complete and balanced picture.

The countryside is inadequately covered. The section on the Environment seems to reflect the priorities established earlier in the text on the economy, jobs, housing and economic growth. The extraordinary quality of the rural environment around Guildford is more or less disregarded.

Reference needs to be made to the extent of MOD land in Guildford which is not available for development. The amount of property and land owned by

the National Trust needs to be recorded and mention made that the Wey and Godalming Navigation is managed by this organisation. Reference to the Wey and Arun Canal project should also be made.

CPRE notes that there is no indication of the extent of land managed by the Surrey Wildlife Trust on behalf of the GBC and the SCC which is presumably not available for development.

The Surrey Hills AONB on which GBC serves as a Board member should be included. It is estimated that over 10 million tourists visit this nationally important countryside every year.

The Royal Horticultural Society gardens which are one of the largest tourist attractions in the South of England should be included as a “strength”. We are informed by the RHS that visitor income last year hovered around £1 million and that they are expecting to reach £1.2 million next year as a result of their planned investments. The number of garden visitors in 2012 was 964,000.

Loseley Park which is visited by over 100,000 people per annum needs inclusion; additionally the newly refurbished Watts Gallery in Compton which has received national media attention should surely be mentioned.

The data should include information as to the number of golf courses in Guildford District. There are a total of 140 in the whole county. Natural England will not normally include golf courses within AONBs as a matter of policy as they do not meet the criteria established for “natural beauty” and have a suburbanizing effect.

There is no indication of the GBC position as regards the airfields in and around Surrey which make this the most overflowed county in the country. These include Battersea Heliport, Biggin Hill, Blackbushe, City of London, Dunsfold, Fairoaks, Farnborough, Gatwick, Heathrow, Odiham, and Redhill. All generate surface road traffic, air and noise pollution, and do nothing to prevent climate change. CPRE would object to the location of a heliport at Guildford because of the noise disturbance it would cause.

Q2

CPRE has severe reservations about the Evidence Base so far prepared for the local plan.

These can be summarized as follows:

+Some of the information is now out of date as it was prepared before the NPPF was published.

+Other evidence that is needed is not yet available. CPRE was highly critical of the previous Strategic Housing Market Assessment (SHMA) which was prepared for the SE Plan and covered not only Guildford but also Waverley and Woking.

+Many of the documents are so extensive as to be wholly indigestible for analysis in depth during the consultation period by the general public.

+Our impression is that the “evidence” documents have been prepared to prove a point rather than provide a neutral, objective and balanced report upon which to make decisions.

The GB&CS in particular is flawed in approach and inconsistent in application. CPRE understands that it is not the intention to consult on this document or the Strategic Housing Land Availability Study (SHLAA) as these are to be considered as merely technical documents that provide the evidence base for the “Issues and Options” publication. Unfortunately, they include interpretations of planning policy which are a cause for concern as the judgements made lead to proposals for substantial green field housing development which in some cases affects the Surrey Hills AONB and the adjoining AGLV. Whereas in appearance it may seem authoritative and comprehensive, in fact the GB&CS analysis gives a distorted picture. Moreover, the study has no cut-off limit for housing!

The document omits one of the important purposes of the Green Belt which is “to assist in urban regeneration, by encouraging the recycling of derelict and other urban land”. This is justified by the statement that this purpose applies to all Green Belt land in the study. The effect of this decision is that more Green Belt sites are selected than would have been the case had it clearly been indicated that they should be restricted to encourage urban regeneration. Clearly developers find it easier to build on green field sites and more costly and difficult to construct housing at urban locations. Recycling urban land should be encouraged not just in Guildford but also on the brownfield sites of South London.

The study is also out of date because it was prepared before the NPPF was published. It does not therefore take account of Paragraph 14 on page 4 of this document which contains the statement:

“Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change...”

but then goes on to say (with the capital letters provided by CPRE for clarity) :

“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 in this Framework indicate development should be RESTRICTED.”

An explanatory footnote 9 is given at the bottom of the page to clarify the “specific policies” concerned which include Green Belt, Local Green Space and AONBs.

It is clear therefore that GBC can, if it so chooses, argue against “objectively assessed needs” for housing where specific policies indicate that any benefits will be outweighed by adverse impacts. The GB&CS does not do this because it does not fit in with the approach it appears that it has been instructed to follow by those who commissioned this work.

Paragraph 17 on page 9 goes on to give a set of 12 core land-use planning principles. These include the statement that planning should:

“take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it.”

The NPPF includes one whole chapter on “Protecting the Green Belt” (9) and another on “Conserving and enhancing the natural environment” (11) which are not reflected in the

content of the GB&CS report. The well established policies of the Green Belt to protect open space, prevent encroachment into the countryside and stop linear development leading to the joining together of developed communities seem to have been ignored by the GB&CS study.

The robust, independent assessment of Guildford Borough's Green Belt and "countryside beyond the Green Belt" that was called for does not assess the sustainable criteria required which should have included landscape quality and the likely impact of any housing or other development proposed, both visually and in terms of infrastructure and openness. The study has failed to take into account the two volumes of the Guildford Landscape Character Assessment & Guidance published in 2007 and the Chris Burnett Review of the AGLV issued in the same year which evaluates the degree to which the AGLV matches the high quality characteristics of the AONB countryside it overlaps and adjoins.

This omission undermines the credibility of the work undertaken, especially as Natural England have now been requested by the Surrey Hills AONB Board to proceed with the AONB boundary review which is referred to in the Surrey Hills Management Plan 2009-2014 in Paragraph 1.6.2 on page 11. This states that:

"Significant parts of the Surrey countryside adjacent to the AONB are designed at a county level as Areas of Great Landscape Value (AGLV). These areas act as a buffer to the AONB but they also have their own inherent landscape quality and are significant in conserving the landscape setting of some towns. Although AGLV is not a national designation with equal status to the AONB, this Management Plan recognizes the importance of the AGLV land in protecting the integrity of the Surrey Hills AONB landscape, particularly views to and from the AONB. The application of the Management Plan policies and actions to AGLV land will be instrumental in helping to conserve and enhance the Surrey Hills."

No proper account has been taken by the GB&SC or the SHLAA of this policy requirement which has been agreed by the GBC and the SCC, together with the other Core (Funding) Partners of the Surrey Hills AONB Board. In addition the SCC unanimously resolved in March 2013 to use its powers to protect the Metropolitan Green Belt which overlaps all of the AONB and AGLV in Guildford Borough. These material planning considerations should have been taken into account and given their appropriate weight by those concerned when preparing a list of Potential Development Areas (PDA) but it is clear that this did not take place. It appears that these reports do not attach any weight to the AGLV.

We were amazed that any AONB land should have been identified as a PDA. Paragraph 115 on page 26 of the NPPF makes it clear that:

"Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important consideration in all these areas..."

Paragraph 116 goes on to say:

"planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest".

We maintain that AONB and AGLV land should not therefore be considered for development.

The lack of any weighting in the Green Belt assessment has created misleading results. Some of the methodology does not stand up to examination, and the judgements made are inconsistent. We maintain that Green Belt development should only be permitted if “very special circumstances” are shown to exist which have to be robustly justified in all cases.

No proper analysis has been made of the role of windfalls in the house building performance of Guildford in previous years. This is an omission that needs to be looked at.

In summary, we consider that the GB&CS document is so flawed that it fails in its task and lacks credibility. It is hard to believe that this document can be considered as an adequate evidence basis to establish the soundness of the plan. It is astonishing that so little attention is given in this document to established policies proven over many years.

Q3

We can accept that balanced and sustainable growth should be an objective for Guildford within the policy limits laid down by NPPF. This should be possible without encroaching on the countryside that is valued so highly by residents and visitors alike.

The scarce land resources in the town must be used intelligently for housing and other community infrastructure such as schools, the hospital and social requirements.

It is important that the town’s character is maintained by avoiding further development as a dormitory suburb of London, but rather as an important local centre.

Planning for a revolution in retail is a difficult challenge to meet. Nonetheless the reality is that the internet is influencing traditional shopping patterns.

Smart growth from office-working at home will also be a factor that has to be considered.

Greater flexibility is needed in terms of providing flats and other accommodation above retail shops and other commercial buildings.

The government has announced the intention to amend planning legislation to allow derelict former farm buildings to be converted into dwellings rather than offices as formerly recommended. This may afford landowners the opportunity to make better and more viable use of farm buildings that are neglected and in need of repair and maintenance.

A survey needs to be done of the buildings used by “public utilities” to assess whether they are fit for purpose, in the right place, and of the right size. It is regrettable that Thames Water can hold up development in the town at Slyfield which is in such a sustainable location for housing and critical to the town’s planning.

Q4

The consultation process is handicapped by the lack of any indication as to the requirement of housing that will be considered adequate to enable the Local Plan to be adjudged sound.

We appear to be entering a negotiation period of some kind, with the government seeking to crank up the housing figures, whilst using the blackmail threat of giving a free hand to developers if we do not accept the forecast of what they consider is needed to declare

the local plan sound.

It is our opinion that we should not be indicating a readiness “to roll back the Green Belt” whose boundary has been established for good reasons as permanent. Policy makes clear in the NPPF that this is only possible in “exceptional circumstances”. We have indicated in point 2 of this letter that Guildford Borough has major and valid constraints on why so much of its area has to be protected and enhanced rather than undermined by inappropriate development. It is important that this is understood.

We find that the evidence documents propose that a blanket density of 40 dwellings per hectare should apply to all new development. This cannot be sound. The town has a wide variety of locations where it cannot be correct to apply such a rule in design and heritage terms. In some urban sectors a higher density is attainable. In others less. The same is true in the Borough’s villages.

Maybe an average density figure could be developed as a target but this will require more analysis. In some of the theoretical calculations CPRE has seen, it has been suggested that if an appropriate higher density is used for new urban development on sufficient brownfield sites, and these can be identified, it should be unnecessary to use Green Belt sites at all. This needs to be reviewed in much more depth bearing in mind the commitment to avoid “garden grabbing” and to keep the annual housing figure at the lower end of the options listed in the housing background document.

We feel obliged to remind you at this juncture of the excellent publication prepared by GBC on the “Guildford Town Conservation Area Character Appraisal”.

Q5

We agree with the Guildford Residents Association (GRA) that “greater clarity is required as to the range of housing needs that will be met by various approaches to affordable housing provision.”

There seems to be a marked reluctance amongst developers to build affordable homes as there is more money to be made from the sale of 4 to 5 bedroom mansions. We are aware of cases where the present system is being circumvented by splitting up housing sites into smaller ownerships before development to avoid having to fulfill a threshold provision for affordable housing (Chilworth), and refusing to build the affordable home element of an agreed development because it is said to be uneconomic and unpopular with potential purchasers for market housing on the same site (Shackleford). The government has indicated in the press that they have a policy change in mind in this context in order to encourage developers not to hold up development of building sites in the hopes that the requirement to subsidise affordable homes will be dropped.

With the shortage of affordable housing as it is, it seems inappropriate for the government to continue with the “right to buy” policy which has led to the sell-off of so much council housing in the past. Presumably, this would not apply to any new development undertaken by GBC in an affordable category.

Q6

We agree with the recommendation made by GRA that “the proportion of affordable homes should be made 1 in 3. This should be reviewed after 5 years.”

We wish to add that pooled contributions should also be provided for the provision of

underground and multi storey car parking on sites where only inadequate ground level parking is provided so that land for more valuable development can be freed up for other purposes (eg at the University campuses, the Research Park, and the Hospital). We understand that examples of underground parking can be cited in Oxford and elsewhere that tackle flooding issues in this context.

Q7

We recognize that there is a role for rural exception housing but we are aware of some antagonism in rural communities in the past when provision for affordable housing is allowed for those who have no justifiable links with the local community.

There have been unfortunate cases where “problem” estates have been created in an attempt to reduce the housing list in urban Guildford without sufficient attention being given to local priority or input from the Parish Council and local residents. Unfortunate decisions of this kind once taken, for whatever reason, are long remembered. There are reports of affordable housing need surveys being made in the past with insufficient input from Parish Councils who should have the last word. CPRE would be reluctant to allow greater flexibility in the size and location of rural exception sites as a general rule or policy.

It must be recognized that half the population in England would like to live in a small green village in Surrey. But this is clearly impossible if the character of place and community identity is to be maintained. Land is not an elastic resource. Priority has to be given to the provision of appropriate housing for older local people, for young married couples, and for students who have to live at home because insufficient accommodation is supplied at the university.

The Department for Communities and Local Government have published in October 2013 guidance entitled “Providing social housing for local people”. This contains a number of useful statements such as:

“Local authorities can now decide who qualifies for social housing in their area, and can develop solutions which make best use of the social housing stock...We know that some local authorities have already decided to include a residency test as part of the qualification criteria for social housing, requiring people to have lived in the area for a certain amount of time before they can go on the waiting list. We believe that this is entirely appropriate and we want to ensure all local authorities adopt such an approach...We therefore propose that the new guidance should encourage all local authorities to adopt a two year residency test as part of their qualifications...we propose that the guidance should also encourage local authorities to consider adopting other qualification criteria alongside a residency test so that people who are able to demonstrate a strong association to the local area are not disadvantaged.”

Q8

We welcome the new “Planning Policy for Traveller Sites” which was published in March 2012 and the subsequent clarification statements on policy made by the government.

We agree that both residential and traveller communities need to be treated fairly and equally. We recognize that providing sufficient appropriate sites for travellers is proving a very difficult problem to resolve. CPRE does not pretend to have expertise in this sector but from experience feels that large traveller sites for many families are not the answer. We can well understand that there is a body of opinion that maintains gypsy accommodation should be more evenly distributed across the borough. We suggest that changing circumstances requires more sustainable sites with access nearer to urban employment.

Q9

Provision of appropriate sustainable housing for the elderly needs to be located close to social services, be accessible by public transport, and help people to live independently. CPRE does not pretend to have the expertise to comment in detail about the options listed. However, we do not believe that building segregated housing areas for the elderly is desirable.

Whilst the success of the University is understandably seen as a reason for satisfaction, it has brought with it a series of social problems which have not been resolved. These include the insufficient use of multi-occupancy accommodation for students on the two campuses, the impact on the adjacent communities where students choose to live in substantial numbers in what was previously available as affordable housing, and the growth of traffic on what was supposed to be traffic free campus areas. Building more halls of residence on campus on the ground level surface car parking lots located there is feasible if multi-storey or underground parking provision is made. A planning policy needs to be implemented, as in other university towns, that requires a higher agreed percentage of the students to live on campus. This would free up more affordable housing for other year-round Guildford residents. It would also help to reduce the less desirable social impact of short term student concentration on local communities.

We object strongly to the proposal to expand onto valuable countryside at the Hog's Back which is currently owned by the university. The AONB, AGLV and high grade agricultural land within the Green Belt which it is proposed to build on needs to be protected.

Q10

The Royal Horticultural Gardens at Wisley which is one of the largest tourist attractions in the South East should be mentioned, and also the Watts Gallery at Compton which has recently been renovated and has received national TV coverage. Reference should be made to the plans for linking the Guildford Museum to the castle and to famous former resident writers in Guildford such as Lewis Carroll and P G Wodehouse. We consider that tourist access to Abbots Hospital should be made more available; and the Book Festival given a higher profile.

We welcome the suggestion that the Tourist Information Centre needs to be further developed. This could be done by enabling access to be made from North Street as well as the High Street. This would promote a higher attendance overall and improve business at the card shop and the café. Greater use should be made of the gallery above the card shop which has a very concealed entrance, and more marketing prominence given to the other gallery upstairs from the main shop of the Tourist Information Centre.

The Guildford Institute on Ward Street which has successfully completed a major renovation, the Electric Theatre, the new facilities for the Guildford School of Acting at the Stag Hill campus of the University of Surrey, the cathedral and the concerts held there should all be mentioned.

We think that in the options there is too much emphasis on the provision of hotels and insufficient on the cultural strategy. There is no reference to the Surrey Hills Area of Outstanding Natural Beauty or to the outdoor recreational activities that take place there.

Q11.

We support the plan to redevelop and intensify the use of existing sites. We support the re-use of underutilized rural buildings for employment use. We should have liked to have seen a reference to smart growth as a concept. We are concerned that the proposals for further growth in employment land and business activity outside the settlement boundaries of the town will increase the traffic gridlock at peak hours and lead to a breakdown of the town's infrastructure.

We are also concerned to make clear that growth should not be promoted to such a degree that the attractive character of Guildford as a gap town in outstanding countryside is put at risk. We believe that better use can be made of employment land. For example, if the Surrey depot at Merrow Lane could be transferred to existing unused commercial land at Burnt Common on the A3 near the Ripley/Send boundary, then space could be freed up for housing at a sustainable location, and HGV use of the sub standard railway bridge with traffic lights at Merrow be considerably reduced.

We should like to see a reference in the forthcoming Local Plan to chapter 7 of the NPPF entitled “Requiring Good Design” which states in paragraph 56:

“The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.”

This has not been the case for a number of employment buildings in the past, notably along the river Wey at Guildford and at the business sites near the river at Peasmarsh at the Astolat and River Wey Estates and Weyvern Park.

We agree that it should be possible to meet the need for higher quality flexible space by planning for the refurbishment of existing office and industrial floor space. We do not believe that the existing business parks should be expanded further, and consider that, for example, by the use of multi storey or underground parking at the Research park in Guildford better use could be made of the existing land without encroaching onto valuable farmland within the Green Belt.

It would seem premature to comment on proposals for an urban extension for business use or for potentially opening a new business park in the countryside when the Enterprise M3 Local Economic Partnership (LEP) are currently carrying out research on this topic through their Land and Property Group. We imagine that they will be investigating the Whitehill Borden site in East Hampshire which is being vacated by the army and has as a result a desperate need for employment in the new eco town, and suitable brownfield sites to offer in this context. CPRE believes that more employment land has been reserved for growth in Guildford than can be justified but has not yet had time to substantiate this impression.

We have carefully examined the questions relating to the rural economy. It seems that it would be useful for the Local Plan team to have a discussion about this with the Surrey Hills AONB Board. We note that for example there is no mention of the work being done in connection with woodland and the use of wood as a source of fuel. There is also no reference to the development of new businesses such as vineyards in the area. Beer is in addition being produced at a number of locations successfully. We would certainly support your opposition to any loss of farmland which you state “is an important contributor to the rural economy” adding “it helps maintain the landscape, which helps to attract tourists, and helps to produce food locally”.

It should be pointed out that many pubs and restaurants in the Guildford area make a point of buying fresh local produce from farmers and butchers within the Borough. It should also be noted the extensive number and success of farmer’s markets that now are in operation. It would perhaps be worth researching the riding and livery stables in the area to find out how many people they employ.

You do not talk about the amazing development of road cycling and mountain biking, which is now a feature of the Surrey Hills at Hurtwood and elsewhere. We found it strange that your

commentary should draw attention to the main town centre uses and the sequential approach which you admit is not applicable.

The symbiotic relationship between the countryside and the town needs to be emphasised. It is because of the attractive countryside that so many directors choose to move here bringing their business success and money with them. If you harm the countryside, you will damage business prospects for the future.

Q12

No option is offered so we will have to wait and see what the Council's policies for the town centre are when the draft Local Plan is published. We note that a Supplementary Planning Document will also be produced.

Q13

CPRE does not normally concern itself with questions relating to the hierarchy of town, district and local centres. We have not understood what the implications are of redefining the town centre's boundary from the explanation provided. However, we would consider that the most sustainable approach for any new development is to locate it in the town.

Q14

Guildford has got the reputation of being a slow motion town. It suffers from the fact that its road traffic problems are handled by 3 separate organizations, namely the Highways Agency, the Surrey County Council and the Guildford Borough Council. The HA should give the A3 attention and do something about the junction of the A3 and the M25. We cannot continue to operate effectively as a community if this prime problem is not given top priority.

CPRE believes that the Hindhead tunnel has proven itself to be a great success even if it was expensive to build and took an enormous length of time to be finally decided and then completed. This encourages us to think that a tunnel from the Hog's Back to Burpham could be the solution for through traffic at Guildford. Only in England is there so much hesitation and delay about going underground. Why cannot this country learn from the experience of its European neighbours France, Germany, Italy and Switzerland, all of whom use road tunnels extensively. Tinkering about with the A3 junctions and the gyratory will not do the trick. We need to bite the bullet if Guildford is to flourish, and build a tunnel.

The development of the main railway station is vital for the future of the town too. Here again we have to deal with a collection of groups representing SCC, GBC, Network Rail and the train operators. There is a lot of ground available which has potential for housing. Multi storey car parking will be necessary because it is a better use of the precious land we have. Tower blocks like Woking has are not the solution. Buildings should not exceed the height of the existing business blocks already present at this location. The railway station needs to have two equally important entrances: one towards the University and the other towards the town. We should consider decking over the railway from Farnham bridge to the tunnel and build housing and flats above. We have been regularly involved in consultations as to what is to be done over many years.

We have to be sceptical about the extent that the provision of cycling routes will solve our traffic problems. Experience of past traffic improvements in this context was that white lines were put on the roads, signs were put up to indicate cycle routes but nothing was done at the roundabouts to make cycling a safe proposition.

We remain to be convinced that the new Park & Ride built at Manor Park will be successful

without direct access off the A3. The amount of surface parking at this campus is almost becoming an embarrassment with facilities for the hotel, the sports hall, and now the Park & Ride. We should remember that the original plan that was presented by the University of Surrey was for a traffic free campus!

We have been talking about improving the North Downs Line for decades. Is this really going to happen? It means that single rail electrification will have to replace the diesels currently used. Has a study yet been made of the number of level and footpath crossings involved and whether the bridges and track are capable of upgrading for a faster two track line for the whole distance? If a faster service is required between Reading and Gatwick via Guildford it seems likely that there will be pressure to reduce the number of stops at Gomshall, Chilworth, Shalford Wanborough, Ash and North Camp. The service from some of these stations to Guildford is already limited making commuting to and from work difficult.

Equally our understanding is that the provision of another railway station at Merrow would not be popular with Network Rail and the train operators on the Guildford to Waterloo line via Cobham. We are not aware of how viable the Park Barn proposal could be. This is a matter for a technical appraisal rather than public consultation.

Q15

We hope that the proposals put forward are crowned with success but we have reservations about how well partnerships of the kind envisaged work out in practice.

Q16

We should like to propose the following:

+ The rail connection from Guildford via Woking and Chertsey to Heathrow seems to have been dropped because of the problems with level crossings at Egham. Please can this be checked and a report given as to where matters now stand.

+ Are any of the buildings occupied by public utilities in Guildford surplus to requirements?

+ Is it desirable to build a larger new Howard of Effingham School, linked to enabling development, with a catchment area covering Bookham, Effingham and Horsley, or to have an additional school on a less ambitious scale built somewhere between Ripley and Guildford, given that a significant number of the proposed students will potentially come from Ripley and Send?

+ Is it the intention to ask for an audit of how the SANGS system has been working before any further decisions are taken as to its future? Is there a document available indicating where the money raised has been spent?

Q17

We think that the document you have published should have included this extract from the NPPF in Chapter 9:

“The Government attaches great importance to the Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence...Green Belt serves five purposes:

- To check the unrestricted sprawl of large built-up areas
 - To prevent neighbouring towns merging into one another
 - To assist in safeguarding the countryside from encroachment
 - To preserve the setting and special character of historic towns
 - To assist in urban regeneration, by encouraging the recycling of derelict and other urban land
- It is necessary to understand that the Metropolitan Green Belt covers 89% of the Guildford District for good reasons because of the proximity of Guildford to London and because a large part of this

total percentage is made up of the Surrey Hills AONB which as nationally important countryside has to be protected and enhanced.

If it had not been implemented, the countryside would have been long since overwhelmed with housing, and linear road and rail development would have joined Guildford to Godalming, Leatherhead and Woking by now.

The whole tone of the Issues and Options document is designed to suggest that it is reasonable for the Green Belt to be reduced in size to accommodate the need for more housing and business growth. This is in our opinion a misrepresentation of the facts.

It is in conflict with the statement made in the Parliamentary Under Secretary of State's letter of 7th October to Anne Milton MP which says that unmet need alone is unlikely to justify the very special circumstances necessary to permit housing development in the Green Belt.

The Green Belt is permanent and any development proposed on it is inappropriate unless very special circumstances can be shown to justify the harm caused by this encroachment. Amending the boundary of the Green Belt can only be suggested when consultation of a Local Plan is being made and cannot be implemented unless exceptional circumstances are shown to justify this action.

Since we are informed that no decision on housing requirements has been made, we consider it both premature and incorrect to talk about a hypothetical situation which may or may not occur.

We find it amazing that so insignificant a mention is made of the Surrey Hills AONB Management Plan to which GBC is a signatory in the whole chapter headed Planning for the Environment.

We have suggested that an audit should be made of how the SANGS system is working before making further recommendations in this context. We should also like to make clear that the quality or condition of land within the Green Belt is not a material consideration as it is the openness which is the critical attribute.

Q18

Rather than identify locations in the borough as requested, we suggest that you consult the Guildford Town Centre Conservation Area Character Appraisal and the Supplementary Planning Guidance on House Design.

Q19

CPRE has no objection to the options proposed. We do, however, have concerns about the unattractive appearance of solar panel installations both on roofs and in ground installations. We are concerned also about the loss of agricultural land for the latter. We have strong reservations too about wind turbines which can be unsightly and represent inappropriate development in the Green Belt.

Q20

CPRE has not had time to assess the Settlement Hierarchy document in depth. We should like to point out that unlike other parts of Surrey, Guildford Borough is a parished area. The villages have for the most part a historic background going back over many centuries. They have retained an individual character and identity; their boundaries have for the most part remained unaltered for hundreds of years.

They are often associated through their wards. For example, St Martha, Albury and Shere are linked through the Tillingbourne Valley, and St Martha's PC also has a close link with Shalford PC

as the village of Chilworth is split between them. A similar association exists between the Horsleys, Effingham, Ockham and Ripley. Our impression is that the parishes themselves and local residents associations should have been consulted about the settlement hierarchy before its appearance in the “Issues & Options” document. Localism surely requires that they are involved in the decision-making as to where development goes.

Q21

CPRE objects to the changes being suggested for “insetting” and restricting the Green Belt. We are of the view that the tests needed for inseting have been incorrectly understood as trees and hedges cannot be seen as incompatible with openness. They are transient features of the landscape and have nothing to do with permanence in planning terms as they can be cut down, become diseased, be burnt or die.

Our impression is that most villages will not accept kindly the idea of no longer being “washed over” by the GB. It is very likely that villages such as Shere will not agree that they are to be treated differently to Albury, Holmbury St Mary and Peaslake.

Proposals made in preliminary work for Natural England regarding the Surrey Hills AONB Boundary review suggest that much of Shalford and a part of Chilworth will be involved, and may become nationally protected countryside. The CPRE position is that further development within the AONB is inappropriate except in very special circumstances and in relation to previously developed land.

It should be recalled that all of these settlements have been included in the 2 volumes of the GBC Landscape Character Assessment and Guidance which we suspect no one in the Settlement Hierarchy exercise has consulted. There is no overview of the Tillingbourne Valley as a whole which is a priority concept as the “Tillingbourne2gether” initiative for the Surrey Hills AONB Board. Preparation is in process to submit a grant request to the Heritage Lottery.

As stated repeatedly, the GB&CS should not be used for guidance. We definitely should not therefore use it to help identify new settlement boundaries for our villages.

Q22

Again as we have no confidence in the GB&CS, we do not think that its guidance should be used to reach a decision. Our view is that the local people should be asked to review this option and reach a decision themselves without undue pressure from outside planners.

Q23

A review needs to be made of who will be the parties with which we will need to cooperate. These will not only be Mole Valley, Surrey Heath, Waverley, and Woking but also the Surrey County council, the London Green Belt Council, the South Downs National Park and the Surrey Hills AONB Partnership. Other possible parties could be NE Hampshire, Rushmoor, the MOD, the National Trust, the Surrey Wildlife Trust, and the Environment Agency. Mention is already made of Natural England. Our impression is that the various LEPs have already been influential in the views expressed in the “Issues & Option” document.

One particular problem on which discussion will be necessary with Waverley is the extent of the house building envisaged at Cranleigh and Dunsfold which if it goes ahead will cause heavy traffic build-up through Bramley and Shalford, where no doubt further housing may be planned, in such a manner as to bring the road to Guildford to a total standstill on a regular basis.

Another Issue is how do we deal with the river Wey and SCC as the Lead Local Flood Authority? As the Slyfield development is a key site for planning purposes, we need to somehow persuade Thames Water to stop holding up this project.

Since Guildford is so dependent on commuting rail traffic both in and out of the town, it would seem advisable for us to demonstrate a duty to cooperate with Network Rail and the Highways Agency and vice versa.

Because of the importance of school provision at Effingham and elsewhere, close cooperation is essential with the SCC on new school location and catchment areas.

Q24

We find it hard to respond to this question since we are not under the impression that it will be necessary or desirable to develop the villages in the way envisaged. We also maintain that they should continue to be “washed over” by the Green Belt as this provides a greater measure of local development control than without.

The vitality of many local villages in Surrey does not necessarily depend on additional housing but on the initiative, energy and business acumen of their residents. For example, the local Post Office in Albury is open thanks to the Albury Estate, the shop in Wonersh is managed by the residents of this village, and the pub in Thursley is there because of local commitment. You overlook the development of farmer’s markets. It is true some pubs are closing but many are flourishing. The establishment of vineyards in Albury and East Clandon are examples of local enterprise, together with the brewery at Scotland Farm.

We are in disagreement with what seems to be being proposed. We certainly object to any idea that will result in an encroachment into the nationally important countryside of the Surrey Hills Area of Outstanding Natural Beauty. It seems perverse to be suggesting such an approach at a time when an extension of its boundaries are being considered by Natural England.

When it comes to the Green Belt, we believe that each case must be considered on its own merits. There is a clear policy that development will be inappropriate unless it is shown that very special circumstances apply and the harm caused is overcome by the positive benefits obtained.

Elsewhere in this response we have already shown that the Government Minister concerned with Planning has acknowledged that “unmet need alone” is unlikely to justify housing development in the Green Belt.

We object to the following proposals which all involve important countryside:

- Encroachment on the Hog’s Back at Manor Farm and Blackwell Farm, part of which is AONB.**
- Encroachment at Gosden Hill and Nuthill Farms near Burpham on land which forms a well established boundary for the Green Belt beyond which it is highly undesirable to expand. If a tunnel is built under Guildford, this land is in any case unlikely to be available or desirable for housing development.**
- Encroachment on AONB land near Pewley and Merrow Downs which is nationally important countryside.**
- Further encroachment on AONB land at Mount Browne and at the Guildford College of Law where the buildings might be considered for a prestige HQ site for businesses or possible University of Surrey use.**

We are very concerned about the proposals to expand development to the West involving the

North side of the Hogs Back which is a very well known landscape feature, consisting of chalk grassland higher up and high grade agricultural land lower down. The proposed development will harm views to and from the Surrey Hills AONB and towards the Cathedral . When the University of Surrey was granted permission to have a second campus at Manor Park, an undertaking was made that expansion to the West would not be permitted. The proposals now are in direct conflict with the previous promises made. To our mind, it is absolutely inappropriate to contemplate development that leap-frogs ancient woodland bordering the Research Park to encroach on open green fields beyond. We maintain that the University has not utilized its land on either campus fully, and has gone back on its word as regards the provision of student accommodation there.

Q25

CPRE is mainly involved with the protection and enhancement of the countryside. We recognize, however, that in an exercise such as this we have to be concerned about the use of land in urban areas as well.

We do not pretend, however, to have an in depth knowledge of the communities of Ash and Tongham.

On the face of it we would not expect to object to the redevelopment of appropriate buildings in our towns and villages. There is no problem normally with brownfield sites or previously developed land. However, the question of good design is an important element for consideration.

We do not welcome the prospect of allowing more rural exception sites to be introduced. We are aware of agreements in the past reached through negotiation with Albury to make a minor modification to the settlement boundary so that new housing could be built. In general we think that the current system works reasonably well where Parish Councils are involved in these decisions on a case by case basis.

We would not normally have an objection to the use of previously developed land in the countryside. The government is producing new policy guidance on the use of derelict former farm buildings for conversion into housing accommodation. This has been successfully done on the Hampton Estate and at Shackleford to our knowledge.

We are concerned about development of countryside in the west of the borough. We are particularly anxious about the linear development that is taking place along the A323 between Guildford and Ash. We are alarmed to see the extent of building in Aldershot, Badshot Lea, Ash and Tongham. We must avoid further coalescence of one community with another and loss of green open space. It is apparent that a great deal of encroachment is threatened onto land which is largely unprotected from development as it is designated as “beyond the Green Belt”.

We cannot imagine that we would find it easy to agree to the use of the countryside in the centre of the borough by extending the town’s boundaries. We would have to consider each suggestion on a case by case basis.

We are concerned about plans for expanding around villages, significantly expanding existing villages, or creating a new village. We have listed the attributes of the Green Belt and its purposes which would apply. Each proposal would have to be considered individually. We do not believe in agreeing to hypothetical alternatives which need to be properly defined and explained before they can be given any consideration.

We have no objection to what is proposed for information sheet numbers 1 to 10. We have no comment to make as regards the information sheet numbers 11 to 19 apart from 12. We would reserve

our opinion on this until such time as more details are supplied. We have no comments to make as regards Ash and Tongham (sheet numbers 20 and 21).

We would need to see full details of what is proposed for the replacement of the Ramada Inn in East Horsley before making any decision.

We have already commented on the Mount Browne site in Q24. We are not familiar with the Merrist Wood college site and so cannot comment. We are not clear as to what development is planned to support the RHS activity. Observation shows that some of the housing in Wisley village appears to be empty and poorly maintained. This property belongs to the RHS who could perhaps provide affordable accommodation there for students and garden workers. CPRE is surprised to learn of the proposed major development of Bisley which we imagined would remain a worldwide centre for rifle shooting indefinitely.

Q26

We cannot easily make a judgement as we are not familiar with Ash and Tongham.

Q27

Paragraph 82 on page 19 of the NPPF deals with the policy as regards proposing new Green Belts. CPRE will need to visit the land proposed before making any comment.

Q28

We object to any use of AONB land. We are not familiar with the land at Gunners and Bullens Hill Farm so we cannot comment. We do not believe that the site described on Information Sheet 38 is appropriate for Park & Ride use.

Q29

The proposals in this section involve a large scale encroachment into the Green Belt. We have attended meetings on this topic in Chilworth, Compton, Effingham, Gomshall, Horsleys, Normandy, Ockham, Shalford, Shere and Wisley. We were unable to attend meetings in Fairlands, Ripley and Send. We are opposed to the proposals we have heard and studied.

Here are some comments:

- We do not believe that any of the communities which you claim to be supporting want to see their villages transformed by the amount of additional housing envisaged.
- We have heard a number of Surrey MPs express their dismay at the challenge being made to the Green Belt in Guildford and elsewhere.
- We have heard questions and comments in the public meetings attended which indicate scepticism about whether those framing these proposals actually know the villages concerned.
- There is a general support for the Green Belt from the vast majority of those who were present.
- Active campaigners have appeared on all sides who oppose this threat to the Green Belt.
- The Parish Councils will write to you with their objections. CPRE is in agreement with all those submissions that we have seen so far.
- Our impression is that the proposals made are deeply unpopular.

Elsewhere in this document you will find comments made involving the Land around Burnt Common warehouse (59) which is underutilised, and our concern about any extension of the Peasmarsh industrial estate (60), which will harm the Green Belt and undermine further the attractive riverside setting of the Wey.

The proposal for the Howard of Effingham school expansion (61) on Green Belt land through an

enabling housing development needs to be reviewed further as the size of the proposed new school appears likely to be too dominant for a village of around 1,000 households which is already overrun with traffic at peak times. The details of what is proposed are not yet public. Alternative possibilities will need to be considered. This will require careful analysis of the school catchment areas involved.

It is hardly surprising that owners of agricultural land in the Green Belt, worth under this designation maybe £5,000 per hectare are tempted to sell, when they are told that this development control policy is to be removed, allowing their land to soar in value.

The way in which the analysis has been done by GB&CS seems to us to be irresponsible as it has not been established what Guildford's future housing needs are yet. Hopefully, more suitable sites will be found in the town which involve the use of previously developed land.

Q30

We do not think that you should do any more work with GB&CS. We object to both paragraphs 9.55 and 9.56. We find the emphasis on growth excessive. CPRE is opposed to further development in the AONB except in relation to previously developed land.

Q31

We are not aware of the reaction of Send and Send Marsh but we know from our meetings at Normandy that they will largely object to your proposal for Flexford and Normandy as we do.

Q32

We do not think that you should do more work on this until such time as you have established whether there is any real need for this proposal to be explored further. Our research suggests that building on the Green Belt may not in fact be required. The key to this question is redevelopment of the Slyfield site where the community is being held to ransom by Thames Water. Some solution needs to be found to this impasse as soon as possible.

If you do decide to proceed anyway, then we presume you will approach the Highways Agency (HA) about road traffic levels on the A3 and A3/M25 junction with which they are no doubt already preoccupied. We are also interested in exploring with the HA the vision of a tunnel going under the town for through traffic. Consideration of the proposal for Wisley airfield will have to join the queue for attention and financial appraisal. Any Wisley proposal will need to review access questions also relating to the A3 Ripley roundabout.

Here are some of the reasons why CPRE does not consider the proposal to establish a new settlement at Wisley airfield is a good idea.

We have had a parallel experience in this connection with Dunsfold's proposals for a new town which was rejected at an inquiry on grounds of unsustainability.

We are also aware of the problem that Whitehill Borden is experiencing with establishing an eco town in North East Hampshire as, with the departure of the MOD, there are no jobs available to justify the original population planning which has had to be severely cutback.

Traffic congestion was a big problem for Dunsfold and we expect will be a problem for Wisley too. The access roads to and from East Horsley are narrow, sinuous and already busy with traffic.

CPRE is also concerned about the prospect of the attractive village of Ockham with its quiet Conservation Area being swallowed up, or as you say "absorbed", by the new proposal and

overwhelmed with traffic.

Other points you will need to consider are:

- Because the airfield is comparatively high in altitude it is visible from the Surrey Hills AONB
- It is unclear when the “large composting facility” will be built and start functioning. Presumably, it will use the same access road as the new settlement for its HGVs.
- The airfield has a beacon for managing air traffic; we are currently exploring what are the technical and space requirements for this. Consultation will be necessary.
- A check will need to be made on the environmental considerations and the ecology. We have seen slowworms on part of the airfield.
- Noise disturbance from the A3 and the M25 will need to be assessed.
- You have already mentioned the Thames Basin Heaths SPA.

What you did not mention is that much of the airfield is good agricultural land within the Green Belt and in use.

Q33

CPRE has been heavily involved with Park & Ride issues over many years. Choosing the correct site is not a simple matter. We note that all the park and rides in Guildford are at ground level like so much other parking. Placing the Park & Ride near Worplesdon railway station appears an attractive concept in theory. However, questions of access, railway timetables, bus service, and a host of other variables will need to be worked on. We are certain that consulting the general public at this stage is premature.

Q34

One solution to the car park problem is to go multi storey but whether this can be done without an unfavourable impact on the environment is uncertain. We wonder whether the SANGS system will continue in the longer term. We have asked for an audit to be made of how well it works and where all the money obtained has gone. We have not had time to study Appendix C.

Q35

The people who go to burial grounds are very often relatively elderly. The site should if possible be tranquil and away from all hustle and bustle. It should be easily accessible by foot and if possible not involve steps. The land should be flat. Because of cremation, most plots are much smaller than in the past and are marked by modestly sized stones. The question arises as to whether a multi faith place of worship needs to be built or not. If so, then the problem of parking will have to be considered. Generally speaking, sites should be accessible by public transport if possible. No one normally visits graveyards after dusk so no lighting should be needed.

Q36

CPRE does not feel itself to have much expertise in this sector. Presumably, the Council will have information on the demand for allotments and a good understanding as to the most suitable likely sites and available locations.

Q37

We are aware that Holy Trinity Amenity Group have proposed a site on the edge of the town near Pewley Down. We should like to support this proposal. We are also aware of other sites in Chilworth and Shalford that are being considered. The Parish Councils would be the best people to be consulted on this topic.

Q38

We are concerned that the Council should be better informed about the countryside. We are

disappointed with the approach that has been followed as regards the villages. We note that Hankinson Duckett Associates who are the consultants appointed by the Surrey County Council on behalf of the Surrey Planning Officers Association and the Surrey Hills AONB Board, and Alison Farmer who was commissioned by Natural England, both refer favourably to the Guildford Borough Landscape Character Assessment. Alison Farmer writes “this is an up to date assessment which uses best practice and contains valuable information for informing an assessment of natural beauty in areas beyond the AONB”. The question is why it is so little used at GBC for planning purposes.

Q39

It is important that GBC works closely with the Surrey Hills AONB Board. Consultation is about to start on the Surrey Hills AONB Management Plan 2014-2019 which is now available as a pre-consultation document. CPRE would like to see the policies of this Plan more vigorously supported by the borough. Close cooperation is desirable on the AONB boundary review when Natural England indicates their readiness to go ahead.

Q40

CPRE would like to suggest that GBC arrange a seminar at which CIL is discussed and its complexities explained. We are confident that a number of our members with planning experience would be interested to attend.

Q41

We do not believe that the general public could come to grips with the mass of evidence and background documentation that has been produced. We found the cost of the brochures was a distinct disincentive to become involved further. It is unrealistic to suppose that everyone can handle the sheer quantity of material produced via their computer screen. We would have liked to see a more balanced presentation of the “Issues & Options”. We felt that we were being “sold” a story of growth and housebuilding rather than being presented with both sides of the argument in an objective manner. We felt that many of the questions asked were designed to produce an answer favourable to the position that GBC has already chosen. We felt that much of the evidence was flawed and some already out of date. We would hope that GBC will argue effectively for a housing figure at the lower end of the scale of possibilities outlined so far. We should not cave in to pressure from the Government!

Surrey has the third largest county membership in CPRE after Kent and Sussex. Guildford District has 250 members which include Parish Councils, Residents Associations and other Amenity Groups. Surrey is the most overflown county in the country, and accordingly has a CPRE Aviation Group to monitor airfield and aviation development. CPRE is an apolitical charity which is concerned with saving the countryside from urban sprawl. Every year, greenfield land the size of Southampton is swallowed up by development. Noise and light pollution are destroying the tranquility of more and more of the rural and urban environment. Our village communities and heritage towns in Surrey are under threat as never before. We are fighting for a beautiful and thriving countryside that all of us can enjoy for generations to come.

We should like to request a receipt for this submission.

Tim Harrold

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