

Carol Humphrey
Head of Planning Services
Guildford Borough Council
Millmead House
Millmead
Guildford
Surrey GU2 4BB

Re Guildford Borough Local Plan Strategy and Sites, Issues and Options

23 November 2013

Dear Ms Humphrey

I am writing to object to proposals for growth above and beyond organic growth in Guildford. It's location, within an hour of London and between airports and coast means that it is already highly populated and suffers from severe congestion and high traffic levels throughout. I do not believe Guildford residents wish to 'compete' with London or grow to become part of outer London or exacerbate existing problems by creating more housing. I support the need to supply local people with housing and this need at a local level (Compton) can be met within the rural exception guidelines and on a wider scale can be met without removing greenbelt by regenerating brown field sites and making better use of car park space.

Points on the questionnaire I disagree with are;

Question 21

Do you support using the Green Belt and Countryside Study to help us decide whether we should identify new settlement boundaries for our villages?

The Green Belt and Countryside study is inherently flawed. I have concerns that the Company who conducted the study (Pegasus) is far from independent, in that they are pro development and that there are no studies to counter argue or balance their views, which were given as the result of a brief by GBC seeking greenbelt land that no longer fulfilled its greenbelt function. The scoring system adopted is rudimentary and in some cases without foundation (development on the Hog's back would permit Guildford town to encroach on several villages on many levels, including a loss of visual amenity, loss of openness, as well as environmental factors and impact on agricultural amenity.

This question asks (in the option section) whether a number of villages should remain in the Green Belt. It is my opinion that all the villages within the AONB (Area of Outstanding Natural Beauty) or AGLV (Area of Great Landscape Value) should remain in the Green Belt including Compton, Gomshall, Shere, Chilworth, Shalford and Puttenham, and that small villages like West Horsley and Normandy should also be in the Green Belt even if outside the AONB. The AONB has the status of a National Park and this should prevent any possible 'insetting'.

Increasing settlement boundaries to permit further infill has implications in that this can impact the open nature of a village, which can in turn then result in further loss of protection against growth affecting greenbelt / AONB status? The scale of proposals on the table is alarming and hence the natural response to such extreme threats is to object or become non-cooperative.

Reasonable size projects that meet specific local needs combined with improvements in infrastructure and traffic congestion in particular, would improve faith in the proposals and steady growth led again by specific need would be more acceptable.

Question 30

Do you think we should do more work to assess potential development areas around other villages and settlements?

This proposes assessing land around villages in the AONB (Puttenham, Compton, Albury, Shere, Gomshall, Peaslake and Holmbury St Mary) for further development potential. (paragraph 9.55) The paragraph notes that these areas have not been considered for their development potential as part of the Green Belt and Countryside Study and that further work may be needed to assess opportunities for small scale growth that would not harm the high landscape quality of this area.

Part of the Hog's Back proposal is within the Parish of Compton, the section referred to in the Greenbelt & Countryside study as H1 and H2 (which later becomes a single parcel of land) is greenbelt and part of this is AONB. Neighbouring sections of land here are currently being considered for AONB status and development here, particularly on the scale proposed would remove the very foundations of this status.

It is not appropriate to consider any areas within the AONB outside settlement boundaries for further development potential. These are covered by NPPF 115 which states 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 considerations in all these areas. See also NPPF 116 which states that Planning Permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated that they are in the public interest. Under secretary of State for planning, Nick Boles, recently confirmed that unmet need alone is unlikely to justify the very special circumstances necessary to permit development in greenbelt. The Metropolitan Green Belt is particularly important and restricting it on spurious claims of non-fulfillment will permit London to grow, which will in turn paralyse the most highly populated region of the UK, the South East. It can be difficult to attain community spirit in larger conurbations where as in small villages and settlements people enjoy being part of a close network. Merging villages, may work economically but I would not support this and doubt many people would. Providing centrally located services served by a bus that covers a number of villages, is, for me, still preferable.

As a result it is not appropriate to assess potential development areas in any of the areas proposed.

Q23

Cross Boundary issues including Green Belt

The Metropolitan Green Belt, of which the green belt in GBC forms a part, serves 5 purposes (as reiterated in NPPF 80):

- To prevent 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

These purposes are best fulfilled by concentrating any potential additional housing development in the towns, either in the town of Guildford or in the metropolitan urban area. Both have abundant brownfield areas.

The Green Belt is of enormous significance to all and should not be built on. It is not appropriate to propose a new town of 2175 homes near Ockham on the old Wisley Airfield site which has now reverted to countryside, nor to consider almost doubling the little village of West Horsley (822 homes proposed for a settlement of 1100) by building on green fields.

The Green Belt and the proximity of London are the most important cross boundary issues that affect development pressures in our borough. We must engage with the metropolitan authorities to ensure that we do not experience excessive pressure to take London's overspill, when there are abundant underutilised brown field sites in the metropolitan area.

The responsibility of the planning authorities is to conserve and protect the AONB and the Green Belt. I therefore urge you to do so.

Yours sincerely