

20 APRIL 2017

**BOROUGH, ECONOMY AND INFRASTRUCTURE EXECUTIVE  
ADVISORY BOARD**

20 April 2017

- \* Councillor Jenny Wicks (Chairman)
- \* Councillor Liz Hogger (Vice-Chairman)

* Councillor Philip Brooker	Councillor Geoff Davis
* Councillor Nils Christiansen	Councillor Graham Ellwood
* Councillor Andrew Gomm	Councillor Matt Furniss
Councillor Angela Goodwin	Councillor Angela Gunning
Councillor Nigel Kearse	Councillor Mike Hurdle
* Councillor Julia McShane	Councillor Michael Illman
* Councillor Bob McShee	Councillor Susan Parker
* Councillor Mike Parsons	Councillor David Reeve
* Councillor Mike Piper	Councillor Iseult Roche
* Councillor Matthew Sarti	Councillor Tony Rooth
Councillor David Bilbé	Councillor Paul Spooner

\*Present

**BEI69 APOLOGIES FOR ABSENCE AND NOTIFICATION OF SUBSTITUTE MEMBERS**

Apologies for absence were submitted on behalf of Councillors Angela Goodwin and Nigel Kearse.

In accordance with procedure rule 23(j), Councillor Colin Cross attended as a substitute on behalf of Councillor Angela Goodwin.

Councillors David Bilbé, Geoff Davis, Graham Ellwood, Matt Furniss, Angela Gunning, Mike Hurdle, Michael Illman, Susan Parker, David Reeve, Caroline Reeves, Iseult Roche, Tony Rooth and Paul Spooner were also in attendance.

**BEI70 LOCAL CODE OF CONDUCT AND DECLARATION OF DISCLOSABLE  
PECUNIARY INTERESTS**

There were no disclosures of interest declared.

**BEI71 PROPOSED SUBMISSION LOCAL PLAN**

The Chairman explained that the Board would only be considering comments that related to parts of the plan or evidence base that had changed since the last consultation. The Board also noted the amendments as detailed on the supplementary late sheets as follows:

**Policy A26 Blackwell Farm**

The first page of policy A26 was omitted from the original agenda and the duplication of policy A28 at page 217 should therefore be ignored.

**Policy P5 – Thames Basin Heaths Special Protection Area**

Policy P5 had been omitted from the agenda but now included as part of the supplementary late sheets.

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The Planning Policy Manager and Principal Policy Planner gave a presentation on the proposed submission Local Plan including:

- A six-week consultation period was undertaken for Regulation 19 Proposed submission Local Plan: strategy and sites ("Reg 19 Local Plan") in June/July 2016.
- 32,500 representations were received from 6000 individuals and or independent bodies. 20,000 comments had been submitted previously from 7000 individuals and or independent bodies.
- To provide context on the number of consultation responses Guildford Borough Council received, Elmbridge Borough Council had received 4000 comments, Runnymede Borough Council 750 comments and Waverley Borough Council 4000 comments.
- The key messages were consistent with the last consultation, including updates to the evidence base and changes to policies.
- It was explained that the housing figure target had been reduced by 1400 homes over a 19 year period. The reduction in the number of homes had been achieved by removing the least sustainable sites. For example, a material change of circumstances had occurred whereby a more sustainable site for a secondary school had been identified at the Blackwell Farm site and therefore the justification for such a school at Normandy and Flexford no longer existed.
- Land to the east of the Paddocks, Flexford had previously been designated as a site for 50 homes. The site had been re-surveyed and based upon the evidence, designated as a Site of Nature Conservation Interest (SNCI).
- Owing to representations received, Burnt Common, Send had been designated as industrial land, previously proposed at Garlick's Arch. The site was adjacent to an existing industrial use and was in a less sensitive location to accommodate the proposed use at this site.
- The development expected during the plan period had enabled a reduction in the housing delivery buffer by 10%.
- The forthcoming consultation was in addition to the Reg 19 Local Plan (2016) consultation. All comments made to the previous consultation, alongside the comments from this summer's consultation, would be submitted to the Planning Inspectorate.
- The methodology applied to the Strategic Housing Market Assessment (SHMA) was likely to change owing to pending government policy revisions. The Department for Communities and Local Government (DCLG) had nevertheless advised Guildford Borough Council to proceed with the development of their Local Plan.
- The recommendations of the Board would be considered by the Special Meeting of Executive on 16 May at 10am followed by the Extraordinary Meeting of Council on 16 May at 7:30pm. If approved for consultation, commence statutory regulation 19 consultation on 9 June for a 6-week period.

The Board was advised that Karen Stevens had submitted the following questions:

Is the extension of the Surrey Research Park dependent on either the widening of the A3 or a new link road off the A31 or both? If so, when do these road projects need to be in place?

Is the proposed Blackwell Farm development (with 1,500 homes) dependent on either the widening of the A3 or a new link road off the A31 or both? If so when do these road projects need to be in place?

Are the proposed Surrey Research Park and the proposed Blackwell Farm development (with 1,500 homes) dependent on either the widening of the A3 or a new link road off the A31 or both? If so when do these road projects need to be in place?

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The Deputy Leader of the Council and Lead Councillor for Infrastructure and Governance, Councillor Matt Furniss responded as follows:

“The proposed Blackwell Farm site allocation policy, as revised, is policy A26 of the Draft Local Plan. The allocation includes appropriately 1,800 homes and approximately 30,000 sq. m of employment land (B1) on a 10-11 ha extension to the Surrey Research Park. Of the approximately 1,800 homes, it is considered that a minimum of 1,500 homes will be delivered within the plan period.

The site policy also includes the policy requirements for infrastructure. Requirement 3 of the Blackwell Farm site policy is for a ‘through vehicular link which will be controlled’ between the A31 Farnham Road and Egerton Road. The widening of the A3 Guildford is not a specified infrastructure requirement of this site policy. Rather, requirement 9 states that: ‘When determining planning application(s), and attaching appropriate conditions and obligations to planning permission(s), regard will be had to the delivery and timing of delivery of the key infrastructure requirements on which the delivery of the plan depends, set out in the Infrastructure Schedule in the latest Infrastructure Delivery Plan, or otherwise alternative interventions which provide comparable mitigation’. The cross-referenced Infrastructure Schedule is Appendix C in the Draft Local Plan. This includes scheme SRN2, the A3 Guildford (A320 Stoke interchange junction to A31 Hog’s Back junction) ‘Road Investment Strategy’ scheme.

The status of this scheme in terms of the Department for Transport’s commitment to its delivery and the timing of its delivery at the time of a future planning application will be a material consideration in decision taking.

The present status of this scheme is set out in the Department for Transport’s Road Investment Strategy: for the 2015/16-2019/20 Road Period (2015). This is further explained in Policy ID2: Supporting the Department for Transport’s “Road Investment Strategy” in the Draft Local Plan.

Planning decisions must be taken in accordance with the development plan unless material considerations indicate otherwise.

If we assume that the Proposed Submission Local Plan is adopted and becomes part of the development plan, then a planning application for either all or part of the Blackwell Farm site allocation would be determined with respect to the Blackwell Farm site policy. In short, the site policy requires the provision of a controlled through vehicular link between the A31 Farnham Road and Egerton Road and that regard be had to the delivery and timing of delivery of the key infrastructure requirements on which the delivery of the plan depends, which includes the scheme to improve the A3 Guildford.

If an applicant – for either all or part of the Blackwell Farm site – proposed not to include a controlled through vehicular link between the A31 Farnham Road and Egerton Road and/or did not demonstrate that they had had appropriate regard to the delivery and timing of delivery of the scheme to improve the A3 Guildford, this factor or these factors would be material considerations in the determination of the planning application and it may be refused on this basis. Specifically, the applicant would need to demonstrate that the development would maintain the safe operation and performance of both the Local Road Network and the Strategic Road Network to the satisfaction of the highway authorities, namely Surrey County Council and Highways England, in accordance with Policy ID3: Sustainable transport for new developments in the Draft Local Plan, and also be in accordance with paragraph 32 of the National Planning Policy Framework.

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The timing of the provision of infrastructure necessary for the delivery of future development on the Blackwell Farm site will be agreed as part of any planning application for all or part of the site allocation as brought forward by an applicant. It is unlikely that all of the infrastructure will be required at the commencement of the development; rather the delivery of infrastructure will be phased so that it is provided when the impacts of the development require it. This approach to the provision of infrastructure is set out in Policy ID1: Infrastructure and delivery. This is a standard planning approach whereby planning conditions and planning obligations are placed on a planning consent to prevent either development being occupied before certain infrastructure is provided and/or to enable financial contributions to be made to infrastructure projects that are necessary to make the development acceptable. The revised Policy ID1: Infrastructure and delivery should assist interested parties in understanding the proposed policy regarding infrastructure and the timing of its delivery.”

Prior to consideration of this item, the following persons addressed the Board in accordance with Public Speaking Procedure Rules 3a (vi):

- Mr Andy Stallan (Director of WYG);
- Mr George Hamburger (Send Business Centre);
- Councillor Suzie Powell-Cullingford (Ripley Parish Council);
- Mr Geoff Smith (DMH Stallard acting on behalf of Ewbanks, Burnt Common, Send);
- Mr Steven Brown (Wolf Bond Planning) and;
- Ms Lisa Wright (Save the Hogs Back Campaign).

The Leader and Deputy Leader of the Council thanked the Board for the issues raised and responded to specific questions.

The Board was invited to provide views/comment on the changes made to the draft Local Plan and raised a number of points, including concerns in relation to:

- Policy A58 Burnt Common, Send. Industrial land previously designated at Garlick’s Arch was for up to 7000sqm only. As Burnt Common, Send could accommodate far more than 7000sqm, the concern was in relation to the visual burden caused to the environment by the potential for industrial units as well as the associated infrastructural issues where heavy goods vehicles would use small village roads to access the A3. What was the anticipated final size of the development and what infrastructural support would be put in place?

The Planning Policy Manager confirmed that the site at Burnt Common, Send could accommodate more than 7000sqm of industrial land use. Any more than 7000sqm would however be subject to an Employment Land Needs Assessment (ELNA).

- Did not agree that the draft Local Plan was fit for purpose and was supported by the fact that a total of 32,500 responses had been received to the second consultation on Regulation 19 which now had to go back to consultation.
- Ockham Parish Council had submitted a letter of representation to councillors requesting that the Local Plan was revised in light of the Housing White Paper, which will require a revision of the NPPF. Basildon District Council had agreed to a moratorium to their Local Plan to reduce their housing number dramatically owing to the impact their plan would have to the Green Belt in its present form.

The Leader of the Council confirmed that DCLG had in fact recently advised Basildon District Council to proceed with the development of their Local Plan.

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- The annual housing target on page 50 of the agenda papers was left blank and therefore needed to be completed in order for the Executive and Council to approve the Local Plan for public consultation at their respective meetings on 16 May 2017.

The Leader of the Council confirmed that the housing number was a phased target that would be published as part of the papers to be considered by the Executive and Council at their respective meetings on 16 May 2017.

- The government had recently announced that they would be removing student numbers from immigration statistics, which would have an impact on the Strategic Housing Market Assessment (SHMA). This needed to be taken into account when allocating green fields such as Blackwell Farm and Gosden Hill for housing developments.
- Concerned that up to 600 houses at Blackwell Farm and Gosden Hill was being deferred to beyond the plan period. If those houses were not required, then the Board should consider recommending to the Executive the removal of one of key strategic sites or reducing one of those sites significantly in terms of housing numbers.

The Leader of the Council confirmed that the houses were not being removed from the totality of the site allocations. The associated infrastructure requirement would be reduced if the houses were removed and rather wanted to increase Guildford's infrastructural capacity.

- Concerned about the significant uplift in housing numbers at Garlick's Arch and that four rural villages would potentially be swallowed up in one conurbation.
- Buffer of 10% for housing was more than was needed on much valued Green Belt land when only 5% was required by the Planning Inspectorate.
- Concerned that public funding for infrastructure would be limited in the future and that a 20% uplift in houses would inevitably be a burden.
- Welcomed the removal of the site in Normandy in Flexford for a secondary school, as it would protect the Green Belt and Site of Nature Conservation Interest (SNCI), which was consistent with protecting the high sensitivity of the Green Belt.
- Concerned about the amount of rural urbanisation to the East of the Borough, specifically the strategic site at Wisley and the consequential impact of the development on local road networks and railway stations. Concerned that more land could be allocated beyond 2000 homes and requested that policy A35 was amended to specify that only up to 2000 homes would be permitted.
- To include Jacobs Well and Wood Street Village in the six rural Local Centres as detailed under Policy E9: Local Centres, on page 117 of the agenda.
- SANG6, Strategic Suitable Alternative Natural Green Space (SANG) Russell Place Farm, Wood Street Village to be removed from Local Plan as this site had previously been refused twice by the Planning Committee for development.
- Policy S2, page 1, in relation to the total housing number, The Leader of the Council had confirmed that Guildford Borough Council would meet the Objectively Assessed Need (OAN). This was however a choice rather than obligation and was exemplified

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by paragraph 14 of the NPPF that stated OAN would be met unless there were specific policies which indicate that development should be restricted by factors such as land allocated as an SNCI, Green Belt or local green space. Ministerial statements were also referenced that indicated unmet need was not an exceptional circumstance.

The Leader of the Council confirmed that the Planning Inspectorate reviewing Waverley Borough Council's draft Local Plan had already indicated that it was acceptable for exceptional circumstances to be demonstrated to support development in the Green Belt. Unmet need was not a very special circumstance.

- Concerned that if Guildford Borough Council did not have a Local Plan then housing targets would inevitably be set by the government at a significantly higher number than currently set out in the draft Local Plan.

The Board commended the planning policy team for their prodigious work in the production of the proposed submission Local Plan.

The Board

RESOLVED: that the Executive, at its Special Meeting on 16 May 2017, took into account the following recommendation in relation to the proposed submission Local Plan:

- (1) That the draft Local Plan as submitted to the Board, be approved for formal public consultation for a period of six weeks beginning 9 June 2017 – 24 July 2017 subject to the following proviso:
- (2) To amend policy A35, page 240 of the agenda, as follows:

“This is a residential led mixed use development, allocated for:

Approximately **Up to** 2000 homes (C3), including some specialist housing and self-build plots, and...”

The meeting finished at 8.50 pm

Signed .....

Chairman

Date .....