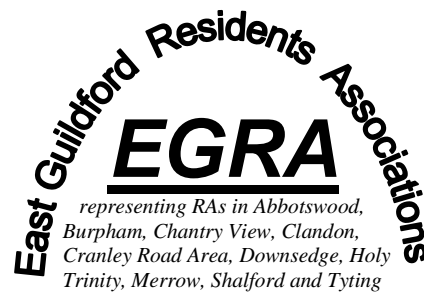


The Rt Hon Hazel Blears MP
Secretary of State for Communities & Local Government
Eland House,
Bressenden Place,
London SW1E 5DU

Cc Ms A Milton, MP
Councillor A Hodges
Ms S di Caprio
Surrey Advertiser
Mr R Anderson GOSE



11 December 2007

Dear Secretary of State

The South East Plan & The Inspectors' Report: Impact on Guildford

I write to you as the Chairman of a body speaking on behalf of 10 Residents Associations in Guildford. Our associations cover a geographical area of about a third of Guildford and we have some 2500 paid up members.

We are concerned that it is very difficult, even for an umbrella organisation such as ours, to engage effectively in the preparation of the South East Plan and that remoteness is leading to draft proposals that fail to take adequate account of local circumstances.

We fully appreciate that there will be a consultation on proposed changes to the draft plan in the New Year. However, we are writing to you now because we attach great importance to your role in considering the Inspectors' recommendations. We consider the current proposals to be unsound and unsustainable in important respects and at odds with significant strands of Government policy. We ask you to reject the Inspectors' proposal that Guildford should be a particular focus for expansion for the following reasons:

1. Natural Constraints and Topography

AONB Downland:

Guildford is squeezed into a narrow gap in the Downs. The protected downland of the Surrey Hills Area of Outstanding Natural Beauty rises to the south-east and the south-west. As well as protecting against inappropriate development on the Downs themselves, the long established AONB policy applies that views from the designated downs should be protected in order to safeguard their natural beauty for the nation.

Floodplain:

A flood plain runs through the town and spreads to the south and north east. It flooded in 1968 and in 2000. On a regular basis, in accordance with the approach advocated in the Thames Region's Catchment Management Plan, land to the north east of Guildford is allowed to flood in order to accommodate water that would otherwise inundate the town. Guildford exemplifies the strategy in Making Space for Water that we need to respect the positive water storage role of natural flood plain.

Green Belt:

The town is encircled by Green Belt, a designation intended to prevent urban sprawl and coalescence. Significantly, it was created at a time of enormous pressure for post war housing growth. Its very purpose was to prevent us from taking the short sighted option and allowing inappropriate expansion of our towns. If we are now nudging up against the boundaries we set for ourselves (and, as the Inspectors recognise, the limits of intensification *within* the town's boundaries are being reached), it is time for a new solution,

such as new towns or expansion of less constrained towns, not a lifting of the limits we set. The importance of respecting environmental limits has been elevated in the Government's recent review of its Sustainable Development Strategy.

Impact on Special Protection Area:

Internationally rare heath land lies to the north-west and must be protected from the pressures of development under the European Habitats Directive. Housing built in the area suggested by the Inspectors would be within the 5km protection zone required to protect the Thames Basin Heath Special Protection Area. It is one thing to accommodate modest household growth and diversification of the housing stock within this zone. Hence, Suitable Alternative Natural Greenspaces are to be promoted in an attempt to deflect visitor pressure from the vulnerable lowland heath habitats. It would be quite another matter to deliberately establish a very significant housing growth area within such close proximity to the SPA, especially when the SANGs proposed are existing areas of recreation rather than new recreational provision.

Guildford's ability to grow is therefore, because of its location, heavily constrained

2. Sustainable growth on the scale proposed is not possible

Guildford is a transport hub because it lies at the point where road and rail routes cut through the Downs. It is a pinch point within the county that suffers the highest traffic levels outside London. Guildford's historical roads are narrow and cannot cope with the current level of traffic through the town let alone the increase in traffic and parking that would come from the 31% increase in housing growth proposed by the Inspectors.

Insufficient attention is paid in the draft Plan to cumulative impacts. Ward by ward analysis of the proposed annual housing growth figures leads to the realisation that Guildford town would experience well over a 25% increase in the number of households by 2016. (The figure will be much higher if the suggestion is pursued that windfall development may no longer count towards housing allocation targets.) The sustainability impacts of growth on this scale have not been adequately addressed. The environment is suffering with the current level of development. The scale of growth proposed risks damaging the factors that underpin Guildford's economic success. The town needs to be able to compete, in an increasingly international market, as an attractive place to live.

3. Historic Guildford's infrastructure cannot cope with these proposals.

This is not a case of residents resisting change. Guildford has a long tradition of adapting and evolving to accommodate more dwellings. However, the ratcheting up of centrally determined housing targets at prescribed densities, much of it to meet the needs of inward migration into the region, is resulting in deterioration of the quality of life of residents.

The proposal by the Inspectors that the increased housing in Guildford can be de-linked from the provision of adequate infrastructure will cause particular problems locally. Investment in infrastructure has already failed to keep pace with development and services are already strained as exemplified by the lack of sewer capacity to cope with a development of 200 dwellings proposed for the Defra site.

4. Are the recommendations soundly based on Strategic Assessments?

We are concerned that the Inspectors decided to override growth limits suggested by capacity studies when they increased housing targets. It is also not clear to residents that proper Environmental, Habitat Directive and Strategic Flood Risk Assessments have been undertaken or heeded. Insufficient attention has been paid to problems identified in the Sustainability Appraisal, problems that would be exacerbated by the proposal to further expand Guildford.

The Strategic Flood Risk Assessment appears to be being undertaken retrospectively, rather than informing decisions such as housing allocations. In view of the experience of flooding this year, being examined by Sir Michael Pitt, it would be unwise, as well as contrary to PPS 25, to justify development in the floodplain under the sequential test rather than to identify areas of lower flood risk guided by strategic assessment.

We are aware that an Appropriate Assessment was required to ensure that policies in the Surrey Waste Plan would not harm the Thames Basin Heaths and other sites protected by the European Habitats Directive. The SE Plan also gives strategic direction to waste policy and advocates a mix and regional distribution of facilities. We are not aware that these policies have been informed by an Appropriate Assessment to ensure no harm would be caused to species and habitats of European significance within the SE region. An Appropriate Assessment was undertaken to determine and mitigate against harmful impacts from overall housing growth targets proposed by SEERA for the SE Plan. However, it is not clear that the Inspectors' proposal to target increases in housing allocations has been informed by Appropriate Assessment.

For these reasons EGRA asks you to indicate that you are minded:

- to **reject** the proposal of the Inspectors to increase housing targets for Guildford by 31% over and above what SEERA proposed. Given the constraints in Guildford, the SEERA housing growth figure would be challenge enough, bringing problems of “town cramming and loss of urban quality”.
- to **reject** the suggestion that higher density development will often be appropriate within hubs. Hub status is not the appropriate determining factor.
- to **reinstate** a distinction between *transport* and *housing growth* hubs, as opposed to identifying housing growth as a function of all “hubs” as currently proposed. In the case of Guildford, the *transport* hub function stems from its location as a gap in the Downs, but this gap town location is also the very reason it is inherently ill-suited to a role as a *housing growth* hub. These functions should remain decoupled.
- to **reinstate** the policy that housing growth should be dependant upon timely provision of infrastructure.
- to **ensure** that recommendations in the Plan are informed by relevant strategic assessments. We would welcome reassurance that housing growth planning has been informed by Strategic Flood Risk Assessment in line with PPS25, that an Appropriate Assessment has been undertaken in accordance with the Habitats Directive to establish impacts (including air quality and traffic) from the regional waste policies advocated in the Plan and that rigorous consideration has been given in the Strategic Environmental Assessment and Sustainability Appraisal to the need to respect environmental limits, a key pillar of Sustainable Development.

If we deny the special circumstances that apply in Guildford, we face the prospect of vast housing estates with inadequate community infrastructure, more severe consequences at times of flood, town cramming, loss of character and economic distinctiveness, harm to environmental quality including protected countryside and wildlife, and ever more severe congestion from traffic and parking. We look to you and your colleagues at GOSE to make the changes necessary to achieve a SE Plan that will provide the strategic planning framework to deliver a vibrant, healthy, sustainable community. This was the intention of the May 2007 Planning White Paper.

Yours sincerely

Dr G Hibbert

Chairman EGRA