

Guildford borough Submission Local Plan Consultation Statement 2017

December 2017



GUILDFORD
BOROUGH

Alternative formats

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Draft

Local Plan: Strategy and Sites Consultation Statement (Regulation 22)

This Consultation Statement describes how Guildford Borough Council has undertaken community participation and stakeholder involvement in the production of the Local Plan, in accordance with Regulation 19. It has been produced to support Guildford borough's Regulation 18 Consultation Statement as published in June 2016 (see **Appendix 11**). These two documents together respond to and therefore fulfil requirements set out in the Town and Country Planning (Local Planning) (England) Regulations 2012, and specifically Regulation 22(1) part (c).

Regulation 22(1) part (c) requires the submission to the Secretary of State of a statement setting out:

- (i) which bodies and persons the local planning authority invited to make representations under Regulation 18
- (ii) how those bodies and persons were invited to make representations under Regulation 18
- (iii) a summary of the main issues raised by the representations made pursuant to Regulation 18
- (iv) how any representations made pursuant to Regulation 18 have been taken into account
- (v) if representations were made pursuant to Regulation 20, the number of representations made and a summary of the main issues raised in those representations and
- (vi) if no representations were made in Regulation 20, that no such representations were made.

(Regulation 20 refers to representations made regarding the local plan published at Regulation 19.)

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All Proposed Submission documents relating to the Local Plan consultation can be found along with other supporting information on the Guildford Borough Council website at: www.guildford.gov.uk/newlocalplan/previousconsultations

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1. Introduction

This Consultation Statement sets out how Guildford Borough Council (the Council) undertook consultation on the Guildford Local Plan during 2016 and 2017 in accordance with Regulation 19. It summarises how we consulted, who was invited to make representations and the comments that were received.

To date, the Council has undertaken two Town and Country Planning (Local Planning) (England) Regulations 2012 consultations under Regulation 18 and two consultations under Regulation 19, as detailed below:

- The first consultation was undertaken on Local Plan: Strategy and Sites Issues and Options document and took place between Tuesday 1 October and Friday 29 November 2013 over an eight-week period.
- The second consultation was undertaken on the Draft Local Plan: Strategy and Sites (2014) and took place between Tuesday 1 July and Friday 26 September 2014 over a 12.5-week period¹.

These two Regulation 18 consultations are covered in detail in the Guildford borough Regulation 18 Consultation Statement (June 2016) which can be found at **Appendix 11**.

- The third consultation was undertaken on the Proposed Submission Local Plan: Strategy and Sites (2016) and took place between Monday 6 June and Monday 18 July 2016 over a six-week period in accordance with Regulation 19.
- The fourth consultation was undertaken on the Proposed Submission Local Plan: Strategy and Sites (2017) and took place between Friday 9 June and Monday 24 July 2017 over a six-week period in accordance with Regulation 19.

Therefore, in total we have consulted for just over 32 weeks and given the community significant opportunities to provide input and comment on the emerging Draft and Proposed Submission version of the Local Plan. This significantly exceeds the number and length of consultations stipulated in the Regulations for Regulation 18 and 19. See **Appendix 2** for a list of the Local Plan consultees.

In total, over 84,000 comments have been received and between 3,000 and 7,000 people/organisations have made representations at each round of consultation. Just under 15,000 unique people or organisations have responded over the four consultations.

This statement sets out what consultation has been undertaken in accordance with Regulation 19 during 2016 and 2017, when, and with whom. It has been produced to support the Guildford borough Regulation 18 Consultation Statement (June 2016) (see **Appendix 11**). These two documents together respond to and therefore fulfil requirements set out in the Town and Country Planning (Local Planning) (England) Regulations 2012, and specifically Regulation 22(1) part (c) which states that a Consultation Statement has to be produced to set out:

- which bodies and persons the Council invited to make representations under Regulation 18
- how those bodies and persons were invited to make representations under Regulation 18

¹ These dates differ to the dates originally advertised in the publicity materials (1 July to 22 September 2014) after the Council took the decision to extend the consultation period.

- a summary of the main issues raised by the representations made pursuant to Regulation 18
- how any representations made pursuant to Regulation 18 have been taken into account
- if representations were made pursuant to regulation 20 [regarding the Local Plan published under Regulation 19], the number of representations made and a summary of the main issues raised in those representations and
- if no representations were made in Regulation 20, that no such representations were made.

The Regulation 18 and Regulation 19 Consultation Statements combined will assist the Inspector at the Examination in determining whether the borough's Local Plan complies with the requirements for public participation and government guidance.

Both documents together show that the consultation carried out by the borough has complied with the statutory requirements set out in the Town and Country Planning (Local Planning) (England) Regulations 2012 (Regulation 18 and 19). They also show that public involvement was carried out following the approach set out in the Council's Statement of Community Involvement (SCI). This is contained in our 'Community Involvement in Planning' document (2013) which can be found on the Council's website here:

<https://www.guildford.gov.uk/ces>.

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2. Consultation on Proposed Submission Local Plan: Strategy and Sites (2016)

This section of the Consultation Statement sets out how the Council undertook a consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 during 2016. Consultation on the Proposed Submission Local Plan: Strategy and Sites (2016) took place between Monday 6 June and Monday 18 July 2016 (a six-week period).

The six-week period meets the statutory requirements of the Regulations and also avoided the Surrey state school summer holiday. It gave the community the opportunity to review and comment on the Proposed Submission Local Plan: Strategy and Sites (2016).

Promotion of the consultation period

The Proposed Submission Local Plan consultation period was promoted through a range of means including emails, local media relations, digital and social media and a variety of other methods:

- Six themed press releases highlighting different aspects of the Proposed Submission Local Plan and promoting the consultation
- Coverage in local and national online, TV, radio and printed media including The Surrey Advertiser, Get Surrey, Eagle Radio, BBC Surrey and the Guildford Dragon News Regular and repeat tweets or posts via @GuildfordBC accounts - Twitter and Facebook with pinned posts
- Specific [microsite](#) dedicated to the Local Plan, as part of the Council's website and links from the front page of the main Council website
- A double page spread in the 'About Guildford' newspaper, circulated to all residential addresses in the borough with a print run of almost 60,000 copies
- Production of a five-minute video describing the Local Plan and the reasons for producing a Local Plan, published on the website and copied by local newspaper Get Surrey on to their website
- Wrote letters to and emailed approximately 12,500 people from the database of Local Plan stakeholders
- Internal Council communications to officers and elected members

The six themed press releases were issued to local media from 20 May 2016 until the closure of the public consultation period and remained on the News and Event page of the website thereafter. Each press release explained how to leave feedback on the Plan and the deadlines for doing so.

The Local Plan microsite, which sits within the Council's main website, was utilised to make information on the consultation more accessible. The microsite included an explanation of the Local Plan, a copy of the Proposed Submission Local Plan (2016) and all associated documents available to download, and information on how to comment. The online consultation system, INOVEM, was embedded into the microsite enabling online feedback to be provided more easily. Furthermore, the Local Plan and accompanying documents, including the representation form, were made available in hard copy, which could be viewed at the following locations across the borough:

- Guildford Borough Council offices, Millmead House, Millmead, Guildford, Surrey GU2 4BB during office hours (excluding Bank Holidays)
- Guildford Library
- Ash Library
- Horsley Library and
- Shere Diamond Jubilee Library.

An information postcard was produced and distributed at venues across the borough and at the consultation events. The postcard provided a brief description on the Proposed Submission Local Plan, the consultation period and how to provide comment on the Local Plan.

Consultation events

The following community engagement events took place during the six-week consultation period:

Drop-in consultation events	Dates and opening times
<u>Central borough event</u> <i>Millmead House, Millmead, GU2 4BB</i>	Saturday 11 June 2016, 10am – 5pm
<u>West of the borough event</u> <i>Tongham Community Centre, GU10 1DU</i>	Thursday 16 June 2016, 12 noon – 8pm
<u>East of the borough event</u> <i>East Horsley Village Hall, KT23 6QT</i>	Tuesday 21 June 2016, 12 noon – 8pm

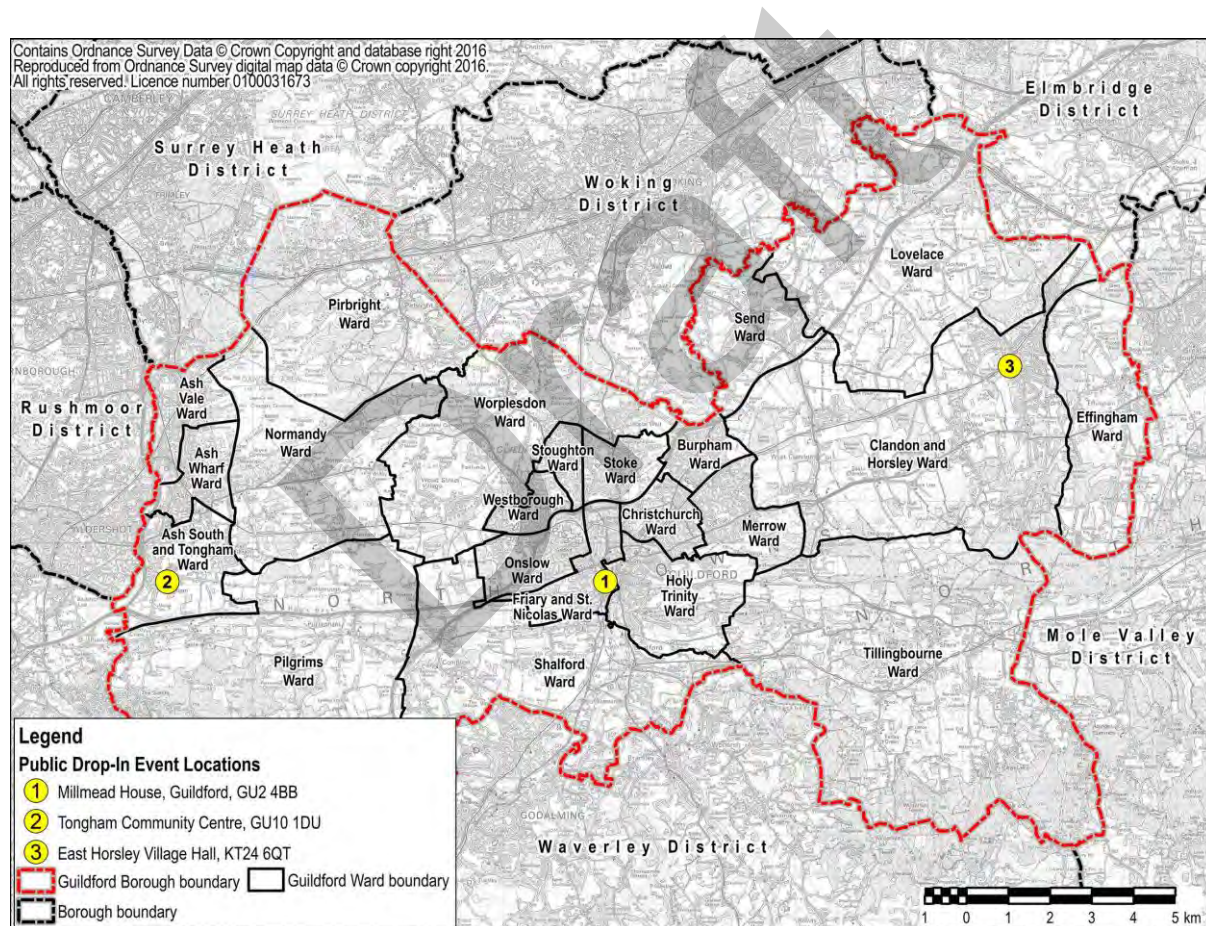


Figure 1: Map of Guildford borough and locations of drop-in consultation events 2016



Figure 2: Proposed Submission Local Plan: Strategy and Sites (2016) drop-in consultation event, East Horsley



Figure 3: Proposed Submission Local Plan: Strategy and Sites (2016) drop-in consultation event, East Horsley



Figure 4: Proposed Submission Local Plan: Strategy and Sites (2016) drop-in consultation event, East Horsley

At the events a copy of the Proposed Submission Local Plan: Strategy and Sites (2016) and supporting documents were available, along with the comments form (see **Appendix 3**), and information on other ways to comment on the Plan, for anyone not wishing to fill in the form at the event. Laptops were available if anyone wished to submit comments online at the events. Guildford Borough Council officers were available for informal discussions and representatives from the consultancy, AECOM, were available to facilitate discussions.



Figure 5: Proposed Submission Local Plan: Strategy and Sites (2016) drop-in consultation event, East Horsley

Seven information boards were on display (see **Appendix 4**). These boards explained what the Local Plan is, why consultation is taking place and how to make comments on the plan. Postcards were available at each drop-in event which explained how to access the consultation material and comment on the Plan online (see **Appendix 5**).

Feedback and questionnaire

Feedback from the community was sought (in a similar way to the Regulation 18 consultation) primarily through comments forms, available both online on the Council website and in hard copy versions. Comments could be made online via the Council's consultation system, INOVEM, which made submitting comments on the Plan easy and accessible, allowing people the time to consider what they wanted to say and in their own time. Emails and letters were also accepted.

A copy of the comments form can be seen in **Appendix 3**. The questions were grouped around common themes and sought views on:

- the evidence base and submission documents
- legal compliance of the Local Plan
- soundness of the Local Plan
- compliance with the duty to cooperate
- interest in attendance at the examination
- comments on particular parts and sections of the plan and
- any remaining thoughts and comments on the Local Plan.

Over 32,000 comments from 6,000 individuals, organisations and stakeholders were received during this consultation period.

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3. Consultation on Proposed Submission Local Plan: strategy and sites (2017)

Following consultation on the Proposed Submission Local Plan in 2016, a second round of Regulation 19 consultation was undertaken in June and July 2017 which focused specifically on the changes that the Council was proposing to make in light of the feedback received and an updated evidence base.

Changes to the Local Plan are shown within the document as tracked changes which identified new text in red and underlined (new text looks like this) and deleted text in red and struck through (~~deleted text looks like this~~). Respondents were invited to comment only on the proposed changes to the Local Plan which included:

- changes to policy wording
- removed sites/newly allocated sites
- amendments to wording within site allocation policies
- changes to maps and
- updates to the evidence base documents.

This targeted consultation on the Proposed Submission Local Plan: Strategy and Sites (2017) took place between Friday 9 June and Monday 24 July 2017 (a six-week period). The consultation was undertaken in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

The six-week period meets the statutory requirements of the Regulations to give the community the opportunity to review and comment on the Proposed Submission Local Plan: Strategy and Sites (2017).

Promotion of the consultation period

The methods of promotion for the consultation period included emails, local media relations, digital and social media and a variety of other methods:

- five press releases promoting the consultation and explaining the targeted consultation on changes to the plan
- coverage in local and national online, TV, radio and printed media including The Surrey Advertiser, Get Surrey, Eagle Radio, BBC Surrey and the Guildford Dragon News
- regular and repeat tweets or posts via @GuildfordBC accounts - Twitter (over 10,400 followers) and Facebook (over 3,000 likes with pinned posts)
- updates to the microsite dedicated to the Local Plan (part of the Council's website) and links from the front page of the main Council website
- a full page spread in the Summer 2017 edition of the Council's 'About Guildford' newspaper, circulated to all residential addresses in the borough with a print run of almost 60,000 copies
- wrote letters to and emailed over 15,000 contacts from the Local Plan database and
- internal communications to Council officers and elected members.

The two press releases detailing aspects of the Plan and consultation period were issued to local media on 17 May and 5 June 2017 and remained on the News and Events page of the website for the following three months. These all explained how to leave feedback on the Plan and the deadlines for doing so (see **Appendix 6**).

The Local Plan microsite, which sits within the Council's main website, was utilised to make information on the consultation more accessible. The site included an explanation of the Local Plan, a copy of the Proposed Submission Local Plan and all associated documents available to download, and information on how to comment. The online consultation system,

INOVEM, was embedded into the new microsite enabling online feedback to be provided more easily. Furthermore, the Local Plan and accompanying documents, including the representation form, were made available in hard copy, which could be viewed at the following locations across the borough:

- Guildford Borough Council offices, Millmead House, Millmead, Guildford, GU2 4BB during office hours (excluding Bank Holidays).
- Guildford Library,
- Ash Library,
- Horsley Library and
- Shere Diamond Jubilee Library.

An information postcard was produced and distributed at the consultation events. The postcard provided information on the consultation period and how to provide comment on the proposed changes to the Plan in red tracked changes (see **Appendix 8**) and enabled people to take away the key information and contact details from the events.

Consultation events

Consultation on the Proposed Submission Local Plan: Strategy and Sites (2017) began at noon on Friday 9 June 2017 and closed at noon on Monday 24 July 2017. During this period, three public exhibitions were held across the Guildford borough in the same locations as the Proposed Submission Local Plan: Strategy and Sites (2016) consultation.

Drop-in consultation events	Dates and opening times	Estimated attendance
<u>East of the borough event</u> <i>East Horsley Village Hall, KT23 6QT</i>	Wednesday 14 June 2017, 1pm – 8pm	162
<u>West of the borough event</u> <i>Tongham Community Centre, GU10 1DU</i>	Thursday 15 June 2017, 1pm – 8pm	153
<u>Central borough event</u> <i>Millmead House, Millmead, GU2 4BB</i>	Saturday 1 July 2017, 10am – 4pm	57

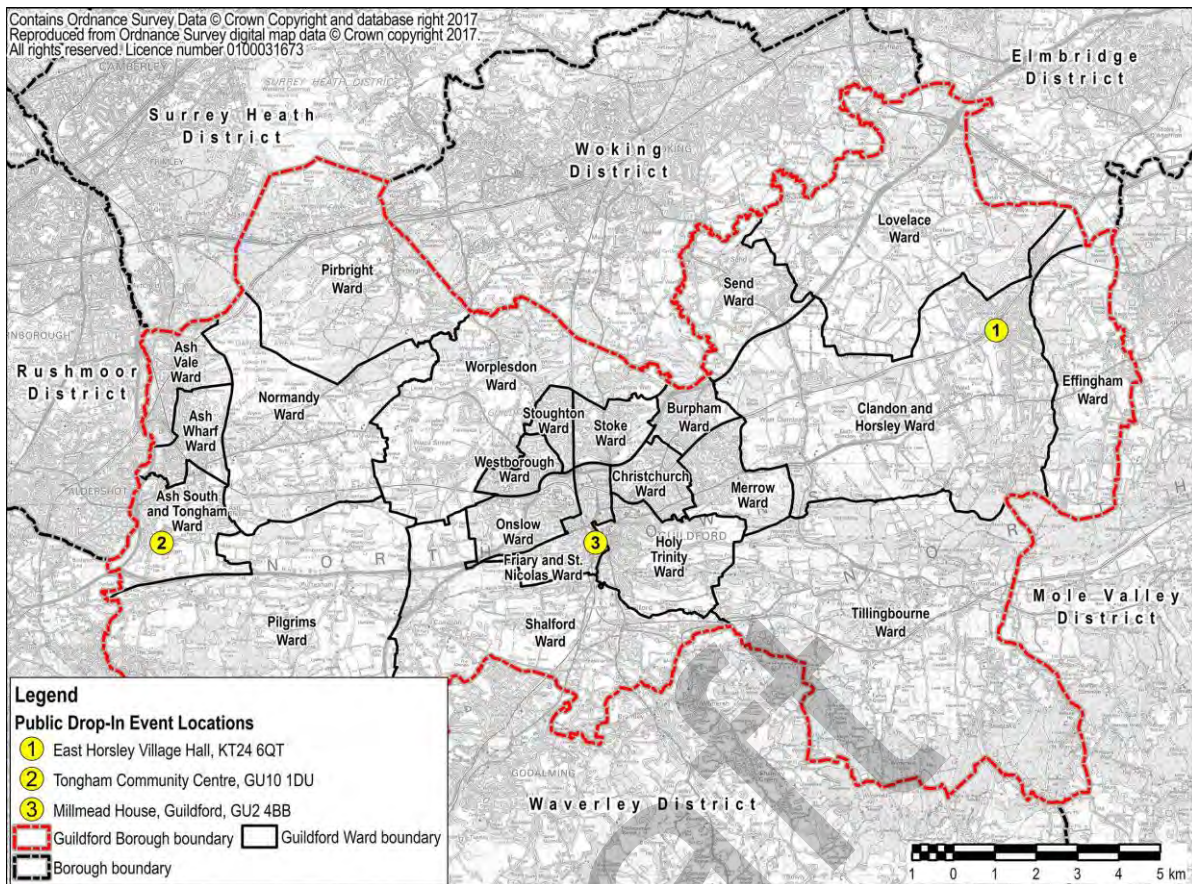


Figure 6: Map of Guildford borough and locations of drop-in consultation events 2017

Figure 7 below shows the attendance map used to sign people in and illustrates where attendees came from to visit the event. This was also used for the Proposed Submission Local Plan: Strategy and Sites (2016) consultation. Each sticker represents a household, and the different coloured dots represent the event attended, as follows:

Proposed Submission Local Plan: Strategy and Sites (2016) consultation

- **Orange** - Millmead House
- **Green** - Tongham Community Centre
- **Purple** - East Horsley Village Hall

Proposed Submission Local Plan: Strategy and Sites (2017) consultation

- **Blue** - Millmead House
- **Red** - Tongham Community Centre
- **Yellow** - East Horsley Village Hall

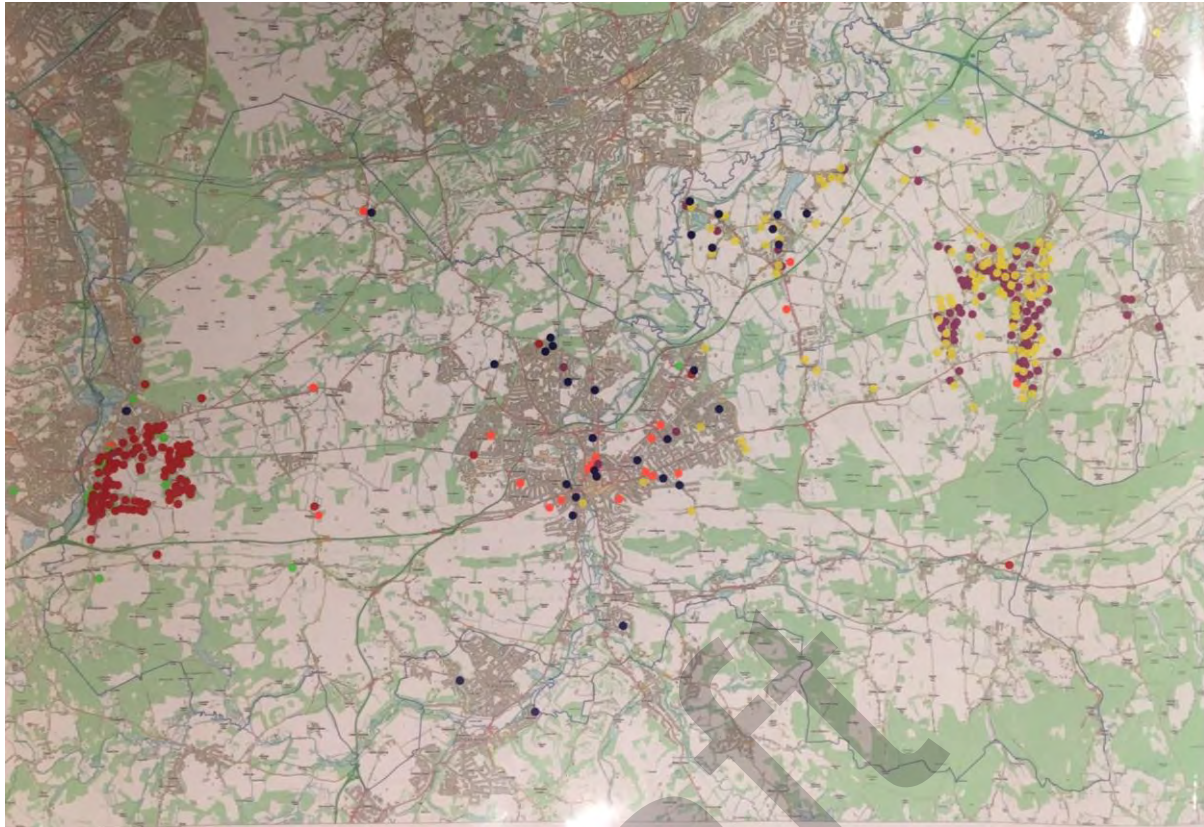


Figure 7: Attendance map at Regulation 19 consultation events (2016 & 2017)

At the events copies of the Proposed Submission Local Plan: Strategy and Sites (2017) and supporting documents were available, along with the comments form (see **Appendix 7**), and information on other ways to comment on the Plan, for anyone not wishing to fill in the form at the event.

The events were attended by a number of Guildford Borough Council's planning officers so that that all questions fielded on the day could be answered by a member of the team with in depth knowledge of that subject matter. For example, planning officers with expertise in transportation, retail, residential or traveler's pitches were all in attendance to answer the public's questions. Furthermore, representatives from the consultancy, AECOM, were available to facilitate discussions.

Six information boards were on display, which informed the public about the Local Plan and why another round of consultation was taking place (see **Appendix 9**). Additionally copies of the Proposed Submission Local Plan: Strategy and Sites (2017) with tracked changes, supporting evidence based documents, and amended maps were available for the public to view. Visitors were also able to take CDs containing copies of all the documents available at the events away with them.



Figure 8: Proposed Submission Local Plan: Strategy and Sites (2017) drop-in consultation event, East Horsley



Figure 9: Proposed Submission Local Plan: Strategy and Sites (2017) drop-in consultation event, Tongham Community Centre



Figure 10: Proposed Submission Local Plan: Strategy and Sites (2017) drop-in consultation event, Millmead

Feedback and questionnaires

As the focus of the consultation was on the proposed changes to the Local Plan since the last consultation in 2016, respondents were asked to ensure any representations made were with regard to the tracked changes identified in red ink throughout the Plan.

Feedback from the community was sought through comments forms and a questionnaire, available both through the Council's online consultation system, INOVEM, and in hard copy versions. The Council's consultation system made submitting comments on the Plan easy and accessible, allowing people the time to consider what they wanted to say and in their own time. Emails and letters were also accepted.

It was made clear that all previous comments received during the Guildford borough Proposed Submission Local Plan: Strategy and Sites (2016) consultation held in June and July 2016 about any unchanged aspects of the Plan will remain valid, and unchanged elements of the plan were not subject to further consultation. The Council advised that all representations received in 2016, alongside those representations received in 2017 that relate to proposed changes, will be submitted to the Planning Inspector.

A copy of the questionnaire, which includes the comments form, can be seen in **Appendix 7**. The questions were grouped around common themes and sought views on:

- the evidence base and submission documents
- legal compliance of the Local Plan
- soundness of the Local Plan;
- compliance with the duty to cooperate and
- comments on proposed changes to the plan that have been produced or updated since 18 July 2016 parts and sections of the plan.

Approximately 9,500 comments from around 3,300 individuals, organisations and stakeholders were received during this consultation period.

4. Main Issues raised during Regulation 19 consultations

The Main Issues identified within the representations received during the Regulation 19 consultations in 2016 and 2017 are set out in **Appendix 10**, along with the Council's response. The issues raised by Prescribed Bodies and Selected Stakeholders are at the start of each table and the organisation name is highlighted in bold. The issues presented in the grey boxes pertain to issues raised during the Regulation 19 Proposed Submission Local Plan: Strategy and Sites consultation (2017). Those boxes with the white background relate to issues raised in the 2016 Regulation 19 consultation.

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- Appendix 1: List of Acronyms
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- Appendix 7: Proposed Submission Local Plan: Strategy and Sites consultation (2017) Questionnaire and Comments Form
- Appendix 8: Proposed Submission Local Plan: Strategy and Sites consultation (2017) Postcard
- Appendix 9: Proposed Submission Local Plan: Strategy and Sites consultation (2017) Information Boards
- Appendix 10: Main Issues (Regulation 19 consultations)
- Appendix 11: Regulation 18 Consultation Statement (2016)

All Proposed Submission documents relating to the Local Plan consultation can be found along with other supporting information on the Guildford Borough Council website at: www.guildford.gov.uk/newlocalplan/previousconsultations

Appendix 1:

List of Acronyms

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List of Acronyms

AGLV – Area of Great Landscape Value

AONB – Area of Outstanding Natural Beauty

A1/2/3/4/5 – See Use Class Order 1987 (as amended)

B1a – Office land use class

B1b – Research and Development land use class

B1c – Light industry land use class

B2 – General industrial land use

B8 – Storage and distribution land use

BOA – Biodiversity Opportunity Area

CIL – Community Infrastructure Levy

DfT – Department for Transport

DLP – Draft Local Plan

DPD – Development Plan Document

DTC – Duty to Cooperate

EIP – Examination in public

ELA – Employment Land Assessment

ELNA – Employment Land Needs Assessment

EqIA – Equalities Impact Assessment

FEMA – Functional Economic Market Area

GBC – Guildford Borough Council

GBCS – Green Belt and Countryside Study

GP – General Practice

HA – Housing Association

HCA – Homes and Community Agency

HMO – Houses in multiple occupation

HRA – Habitat Regulations Assessment

IDP – Infrastructure Development Plan

LAA – Land Availability Assessment

LCA – Landscape Character Assessment

LEP – Local Enterprise Partnership

LRN – Local Road Network

NE – Natural England

NPPF – National Planning Policy Framework

NPPG – National Planning Practice Guidance

OAN – Objectively assessed need

OGSTAR – Options Growth Scenarios Transport Assessment Report

ONS – Office for National Statistics

PMA – Property Market Area

R+D – Research and Development

SA – Sustainability Appraisal

SACs – Special Areas of Conservation

SAMM – Strategic Access Management and Monitoring

SANG – Suitable Alternative Natural Greenspace

SCC – Surrey County Council

SEA – Strategic Environmental Assessment

SHAR – Strategic Highway Assessment Report

SHLAA – Strategic Housing Land Availability Assessment

SHMA – Strategic Housing Market Assessment

SMC – Sustainable Movement Corridor

SNCI – Site of Natural Conservation Importance

SPD – Supplementary Planning Document

SRN – Strategic Road Network

SSSI – Site of special scientific interest SuDS – Sustainable Drainage Systems

(TBH)SPA – Thames Basin Heaths Special Protection Area

Appendix 2:

Local Plan Consultees

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Local Plan consultees

Specific consultation bodies

- The Coal Authority.
- The Environment Agency.
- English Heritage
- Natural England.
- The Civil Aviation Authority.
- Network Rail Infrastructure Ltd.
- Highways England
- Environment Agency
- Historic England
- Homes and community agency
- Marine Management Organisation
- Thames Water
- Surrey Police
- Albury Parish Council
- Artington Parish Council
- Ash Parish Council
- Basingstoke Canal Authority
- Compton Parish Council
- East Clandon Parish Council
- East Horsley Parish Council
- East Horsley Parish Council
- Effingham Parish Council
- Elmbridge Borough Council
- Enterprise M3
- Environment Agency
- Epsom and Ewell Borough Council
- Guildford Borough Council
- Hampshire County Council
- Albury Parish Council
- Artington Parish Council
- Ash Parish Council
- Basingstoke Canal Authority
- Compton Parish Council
- East Clandon Parish Council
- East Horsley Parish Council
- East Horsley Parish Council
- Effingham Parish Council
- Elmbridge Borough Council
- Enterprise M3
- Epsom and Ewell Borough Council
- Guildford Borough Council
- Hampshire County Council
- Highways England
- Historic England
- Mole Valley District Council
- Normandy Parish Council
- Ockham Parish Council
- Pirbright Parish Council
- Puttenham Parish Council
- Ripley Parish Council
- Royal Mail
- Seale and Sands Parish Council
- Send Parish Council
- Shalford Parish Council
- Shere Parish Council
- South East Water Ltd
- St. Martha Parish Council
- Surrey County Council
- Surrey Heath Borough Council
- Sussex and Surrey Police
- Wanborough Parish Council
- Waverley Borough Council
- West Clandon Parish Council
- West Horsley Parish Council
- Woking Borough Council
- Wokingham Borough Council
- Womersley Parish Council
- Worplesdon Parish Council

General Consultation Bodies

- 4-Get-Me-Nots
- Abbotswood Women in Touch
- Ash Residents Association
- Ashenden Residents Association
- Cobham Conservation and Heritage Trust
- Compton Village Association
- CPRE Surrey Branch & Guildford District
- Diocese of Guildford
- East Guildford Residents Association
- Edwin Road Residents Association
- Fairlands Liddington Hall and Gravetts Lane Community Association
- Guildford Access Group
- Guildford Dragon
- Guildford Environmental Forum
- Guildford society
- St Catherines Assoc.
- Lynx Hill Residents Association
- Guildford Residents association
- Guildford Vision Group
- Roseacre Gardens Residents Assoc.
- Shalford Conservation Society
- St Catherines Village Association
- St. Peters Shared Church
- Surrey Chambers of Commerce
- Surrey Wildlife Trust
- The Clandon Society
- The Guildford Society
- The Ripley Society
- University of Surrey
- Weyfield Residents Association

All other residents, business owners and other stakeholders who have either previously responded to a Local Plan consultation or asked to be notified of future Local Plan consultations, currently this stands at over 13,000 individuals and organisations.

Appendix 3:

**Proposed Submission Local Plan: Strategy and Sites
consultation (2016)**

Questionnaire and Comments Form

Draft

Guildford Borough Council

Proposed Submission Local Plan: strategy and sites

Consultation questionnaire and comments form

Guildford Borough Council is inviting representations on the Proposed Submission Local Plan: strategy and sites. This questionnaire asks questions about the document **as a whole** and the documents that have informed and supported the plan. If you would like to make comments about **a particular section** of the document, please use the comment forms at **Appendix 1** of this questionnaire (see question 6).

The questionnaire and comment form both ask questions about **legal compliance, soundness, and compliance with the Duty to cooperate**. For more information about the meaning of legal compliance, soundness and the Duty to cooperate, please read the guidance notes at **Appendix 2** of this questionnaire.

Please note that verbal comments cannot be taken into consideration. We cannot accept anonymous comments and ask that you provide your name and postal and/or email address as a minimum. Your comments and your name will be published when the consultation is complete, but personal information will be kept confidential.

We will collate and analyse all the comments received, and produce a written summary of all comments. We will then progress the Local Plan towards submission to the Planning Inspectorate for examination. Your comments will be also made available to the Inspector who examines the plan.

	Your details	Agent's details (if applicable)
Title	Mr Mrs Miss Ms Other _____	Mr Mrs Miss Ms Other _____
First Name		
Last Name		
Job title and/or organisation (if relevant)		
Address		
Telephone		
Email		

Question 1: The evidence base and submission documents

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D of the plan and can be found on our website at <http://www.guildford.gov.uk/newlocalplan/evidencebase>.

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant? Yes No

If you make a comment about a specific evidence base document, please tell us which document you are commenting on.

Comment:

Question 2: Legal Compliance

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole is legally compliant? Yes No

Please provide the following information being as precise as possible:

- why you consider it is or is not legally compliant and
- what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the case.

Comment:

Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole is sound? Yes No

Please provide the following information being as precise as possible:

- why you consider it is or is not sound and
- what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

Comment:

Question 4: Duty to cooperate

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate? Yes No

Please provide the following information being as precise as possible:

- why you consider it has or has not complied with the Duty to cooperate and
- what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this is the case.

Comment:

Question 5: Examination

If you are proposing a change to the Proposed Submission Local Plan: strategy and sites, do you wish to express an interest in participating at the Examination? Yes No

If you choose yes, please explain why you wish to participate in the Examination.

Comment:

Please note: the Inspector who examines the Local Plan will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the Examination. Written representations hold the same weight as oral representation at Examination.

Question 6: The content of the plan

Please have your say about individual sections of the plan. See the attached comment forms at **Appendix 1** of this questionnaire.

Question 7: Any other comments?

Do you have any other comments that have not been covered by the previous questions? Yes No

Comment:

Appendix 1: Question 6 comments form

Please use this form to make make comments about particular sections of the Proposed Submission Local Plan: strategy and sites. Please use one form for each paragraph/section/policy/map you are commenting on, using as many copies of the form (or additional blank sheets) as you need.

We cannot accept anonymous comments so please append this form to your questionnaire or write your name and contact details (at least an email and/or postal address) clearly at the top of the page.

To which section of the plan (paragraph/policy/map/table) does this comment relate?

Para. Policy Map Table

Do you consider this section of the plan is legally compliant? Yes No

Do you consider this section of the plan is sound? Yes No

Do you consider this section of the document complies with the Duty to cooperate? Yes No

If you answered "No" to any of the questions above, please give details in the box below of why you consider this section of the document is not legally compliant and/or unsound and/or does not comply with the Duty to cooperate. Please be as precise as possible.

You are also encouraged to make general comments about this section of the document. Your comments need not be restricted to the matters of legal compliance, soundness and Duty to cooperate.

Comment:

Draft

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What changes do you suggest should be made to the document?

If you are proposing a change to the Proposed Submission Local Plan: strategy and sites, do you wish to express an interest in participating at the Examination? Yes No

Please note: the Inspector who examines the Local Plan will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the Examination. Written representations hold the same weight as oral representation at Examination.

Why do you wish to participate at the Examination?

Question 6 comments form

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Appendix 2: Legal compliance, soundness and Duty to cooperate guidance notes.

Local Plans set planning policies in local authority areas and form the starting point when deciding planning applications. Independent planning inspectors must examine the 'soundness' of plans through an Examination, which can include public meetings called 'hearings'.

The process of producing a Local Plan should fully involve everyone who has an interest in the document and at the end of the process they should have had the chance to comment and, where appropriate, appear at any relevant hearing sessions of the Examination to present their case.

In summary the Inspectors will be considering three questions:-

1. Is the plan legally compliant?

During an Examination the Inspector will first check that the Plan meets the legal requirements of the relevant Planning Acts and Regulations. A plan is considered legal when it complies with the legal requirements under section 20(5) (a) of the Planning and Compulsory Purchase Act 2004 (as amended). Relevant to this issue (but not exhaustively) is whether the Plan in question:

- Has had regard to national policy and guidance issued by the Secretary of State
- has been prepared in-line with our Local Development Scheme. The LDS is effectively a programme of work prepared by the Council, setting out the documents to be produced. It sets out the key stages in the production of any documents the Council propose to bring forward for independent examination. The LDS can be found online at www.guildford.gov.uk/newlocalplan/lDs.
- complies with the Town and County Planning (Local Planning) (England) Regulations 2012. On submission of the Local Plan, the Council must publish the documents prescribed in the regulations, and make them available at their principal offices and on their website.
- Whether the appropriate notifications have been made.
- Whether a Sustainability Appraisal assessing social, environmental and economic factors has been done and made public. The Sustainability Appraisal is a tool for appraising the plan to ensure it reflects social, environmental, and economic factors.
- Whether the plan meets the requirements of the Habitats Directive and the Conservation of Habitats and Species Regulations 2010 (as amended).

2. Is the plan sound?

To meet the Test of Soundness, the independent Planning Inspector is required to consider if our Local Plan has been **positively prepared**, is **justified** and **effective** and is **consistent with national policy**.

The following points are relevant when considering legal compliance, as set out in paragraph 182 of the National Planning Policy Framework. To be sound, a plan should be:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities and

- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

3. Has the plan complied with the Duty to cooperate?

A legal duty has been placed on local planning authorities, county councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters.

Section 20(5) (c) of the Planning and Compulsory Purchase Act 2004 (as amended) and paragraphs 178-181 of the National Planning Policy Framework create a duty on all local planning authorities and other bodies to cooperate with each other to address strategic issues in the preparation of the Local Plan. The National Planning Practice Guidance sets out further information on the Duty to cooperate.

The National Planning Policy Framework and the National Planning Practice Guidance can be found at <http://planningguidance.communities.gov.uk>.

Draft

Name:

Email:

Address:

Question 6 comments form

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Why do you wish to participate at the Examination?

Appendix 4:

**Proposed Submission Local Plan: Strategy and Sites
consultation (2016)**

Information Boards

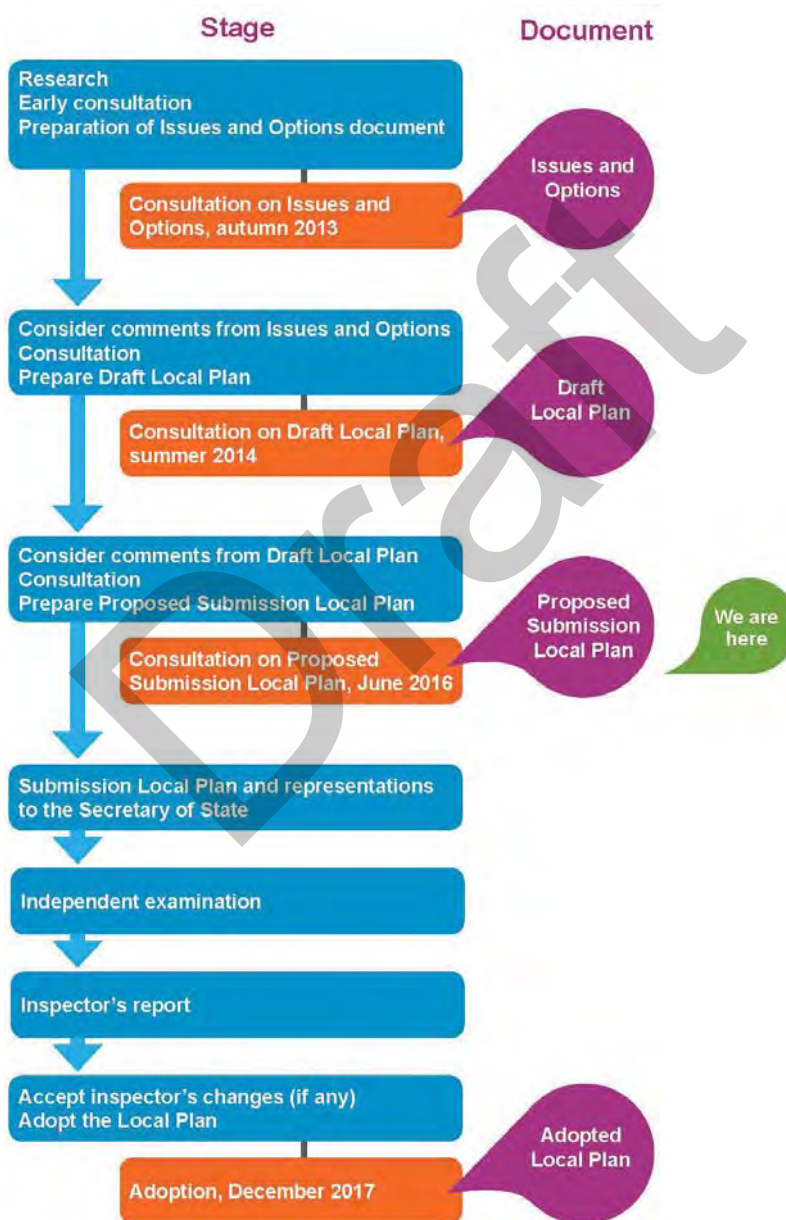
Draft



What happens next?

- The Proposed Submission Local Plan consultation runs from **6 June to 18 July 2016**
- All written feedback received by the Council before 11:59pm on 18 July will be collated and considered.
- We are required to provide a written summary of all the issues raised in the feedback received to the inspector and state how these have been addressed in the Plan.
- The Plan along with your representations will be submitted to the Secretary of State, this is called the **Submission Version of the Plan**.

Stages of preparing the Local Plan: strategy and sites



Please provide your comments before 11:59pm on 18 July 2016



Overview of Policies



Theme 5: Design Policies

Policy D1: Making better places

- Provides guidance on the detailed design principles that need to be considered in new developments

Policy D2: Sustainable design, construction and energy

- Addresses sustainable design and construction by:
 - requiring energy, water and resource efficient development
 - requiring developments to enable sustainable lifestyles for occupants
 - protecting water stocks
 - delivering climate change mitigation and adaptation
 - delivering low and zero carbon energy

Policy D3: Historic environment

- This policy recognises the historic environment is essential to Guildford's character and seeks to:
 - protect and enhance the historic environment and heritage assets
 - support proposals which conserve and enhance the historic environment.

Policy D4: Development in urban areas and inset villages

- Provides guidance on the criteria for assessing new development in urban areas and inset villages to avoid negative impact on the local environment.



Theme 6: Infrastructure and Delivery Policies

Policy I1: Infrastructure and Delivery

- Describes the infrastructure required to support delivery of the Local Plan
- The Infrastructure Schedule indicates the key infrastructure need to support delivery of the plan (refer to Appendix C)
- Proposes that supporting infrastructure is provided as part of new developments

Policy I2: Supporting the Department of Transport's "Road Investment Strategy"

- Sets out the Government's Road Investment Strategy (RIS) and schemes identified within our borough
- Outlines our commitment to work with Highways England in order to facilitate major, long term improvements to the A3 trunk road and M25 motorway in terms of both capacity and safety
- Describes why road improvements are required in order to be able to accommodate the Local Plan growth

Policy I3: Sustainable transport for new developments

- Sets out expectation that new development will contribute to delivery of an integrated, accessible and safe transport system that is balanced in favour of sustainable modes
- Identifies that mitigation will be required to address impacts of development on road safety, capacity and environmental impacts

Policy I4: Green and blue infrastructure

- Focusing on delivering biodiversity enhancement and protecting important sites for biodiversity the borough's waterways and open space of public value by:
 - delivering biodiversity enhancement as part of a strategic approach covering all of Surrey
 - protects important sites for biodiversity
 - protects the borough's waterways with the aim of improving water quality
 - protects open space of public value





Overview of Policies



Theme 3: Protecting

Policy P1: Surrey Hills Areas of Outstanding Natural Beauty (AONB)

- In accordance with the National Planning Policy Framework, there will be a presumption against major development in the AONB
- Proposals submitted within the Area of Great Landscape Value (AGLV) will be required to demonstrate that they would not result in harm to the AONB or the distinctive character of the AGLV

Policy P2: Green Belt

- Protects the Green Belt in accordance with national policy
- Clarifies our approach to appropriate development in the Green Belt, which may include limited housing infill in villages

Policy P3: Countryside

- Seeks to protect areas of the countryside which are not designated as Green Belt, by limiting development in the countryside

Policy P4: Flood Risk

- Aims to ensure development is directed towards areas at lowest risk of flooding first
- Outlines criteria which development must meet in areas at risk of flooding

Policy P5: Thames Basin Heaths Special Protection Area

- Protects the Thames Basin Heaths from the impacts of development



Theme 4: Economy

Policy E1: Meeting employment needs

- Identifies 17 Strategic Employment Sites and seven Locally Significant Employment Sites

Policy E2: Locations of new employment floorspace

- Identifies a hierarchy of preferred locations for employment development

Policy E3: Maintaining employment capacity and improving employment floorspace

- Sets out the evidence required and time period of active marketing before a site is permitted to change from employment to other uses

Policy E4: Surrey Research Park

- Encourages protection of the existing 28 ha Research Park and the proposed extension of it for offices, research, development and design activities

Policy E5: Rural Economy

- Promotes a strong rural economy through:
 - sustainable growth and expansion of all types of business and enterprise;
 - development and diversification of agricultural and other land-based rural businesses; and
 - the retention and development of local services and community facilities.

Policy E6: The leisure and visitor experience

- Seeks to protect existing leisure and visitor facilities in the borough and support the provision of new leisure and visitor attractions and accommodation

Policy E7: Guildford Town Centre

- Describes how the town centre will change over the plan period to 2033 and specifies:
 - a significant retail-led regeneration site to accommodate a major retail, food and drink and residential development at the North Street regeneration site;
 - the protected primary and secondary shopping frontages at street-level;
 - the primary shopping area where retail uses is concentrated, as well as defining the town centre boundary.

Policy E8: District Centres

- Sets out the boundaries of Ash, East Horsley and Ripley and aims to strengthen the liveliness and economic resilience of centres

Policy E9: Local Centres

- Identifies 14 urban Local Centres, six rural Local Centres and four planned new Local Centres at Gosden Hill, the former Wisley Airfield, Blackwell Farm and Normandy and Flexford.



Refer to our policies map to view district and local centres.



Overview of policies

The following three boards provide an overview of the 27 policies within the Local Plan. To read the full policies and for further detail, please go to the Proposed Submission Local Plan: strategy and sites document.



Theme 1: Strategic Policies

Policy S1: Presumption in favour of sustainable development

- When considering development proposals, we will take a positive approach that reflects the presumption in favour of sustainable development contained in national planning policy
- Our aim is to ensure that development improves the economic, social and environmental conditions in the borough

Policy S2: Planning for the borough – our spatial development strategy

- Our development strategy for the borough is based on national planning policy, with recognition of environmental constraints and the availability and viability of land for development
- During our Local Plan period 2013 – 2033 we will make provision for the following:
 - 13, 860 new homes, where the delivery will align with strategic sites and infrastructure provision
 - 37, 200 – 47,200 sq m of office and research and development (B1a and b) floorspace; and
 - 47, 000 – 53, 000 sq m of industrial (B1c, B2 and B8) employment land



Theme 2: Housing

Policy H1: Homes for all

- We will seek to deliver a wide variety of homes to meet the needs of people in our community, by providing:
 - a mix of housing tenures, types and sizes; and
 - housing for a range of groups, including; student housing, traveller accommodation and specialist housing.
- This policy also provides guidance for density of development and houses in multiple occupation

Policy H2: Affordable Homes

- West Surrey SHMA indicates that approximately 455 affordable homes are required each year over the plan period to meet the needs of those unable to afford to buy or rent a home on the open market without subsidy
- Our aim is to ensure that a sufficient level of housing is provided to meet the need of the borough's population and ensures that the borough thrives, with mixed and balanced communities
- Our target, for sites with five or more homes / 0.17 ha or more in size, is for 40% of the housing to be affordable

Policy H3: Rural Exception Homes

- This policy sets out our approach to small housing developments (as an exception to Green Belt policy)
- This type of housing provides for local affordable housing needs for people with a connection to a particular parish within the borough



View the plan at the exhibition today or go to: www.guildford.gov.uk/newlocalplan to view and download the document



Changes as a result of previous consultation

Three key changes to the plan

1. An updated evidence base including:

- The West Surrey Strategic Housing Market Assessment (SHMA), 2015
- The Employment Land Needs Assessment (ELNA), 2015
- The Retail and Leisure Needs Update study, 2014 (published 2015)
- Land Availability Assessment, 2016
- Guildford Borough Transport Strategy, 2016
- Strategic Highway Assessment, 2016
- Level 1 and 2 Strategic Flood Risk Assessment, 2016
- Open Space, Sports and Recreation Assessment and Amenity Assessment, June 2016

View the updated evidence base online at:
www.guildford.gov.uk/newlocalplan/

2. Green Belt sensitivity map

Consideration of the Green Belt sensitivity map from the Green Belt & Countryside Study to help identify site allocations and avoid, where possible, development in sensitive areas.

3. Guildford town centre work

A reassessment of sites in the town centre has taken place, in light of National Planning Policy guidance on development and flood risk assessment, together with consultation on the Town Centre Masterplan which occurred in September 2015.

Further key changes to the plan include:

Local Plan feature	What change have we made?
Improved flood risk assessment	The national flood risk policy has been applied to the identification of site allocations. This was informed by a 'flood risk sequential test' to direct development to areas which are at least risk of flooding
A review of site densities	The density of allocated housing sites in the Strategy and Sites document have been revisited
A review of development on Areas of Outstanding Natural Beauty (AONB)	Greater weight placed on protecting the Surrey Hills AONB through the revision of site allocations and policies in the plan
Enhanced protection to employment land	Greater protection has been given to employment sites by the creation of new policies, including: <ul style="list-style-type: none"> • Policy E3: Maintaining employment capacity and improving employment floorspace • Policy E4: Surrey Research Park
Enhanced protection to Special Protection Areas (SPAs)	New policy introduced which protects the Thames Basin Heaths from the impacts of development <ul style="list-style-type: none"> • Policy P5: Thames Basin Heaths Special Protection Area
Greater protection given to village character	New policies have been introduced to ensure greater protection of our village character including: <ul style="list-style-type: none"> • Policy P3: Countryside • Policy D4: Development in urban areas and inset villages
Protection of open space	Significant updates have been made to the Green and Blue Infrastructure policy (Policy I4). The policy now provides more detail on the open spaces in the borough which will be protected
Transport Infrastructure	New transport infrastructure identified and detailed in the recently published Guildford Borough Transport Strategy 2016





Overview of the plan and themes

The Local Plan

- Sets out our vision, aims and strategy for the borough
- Deals with key issues and planning policies of importance up to 2033
- Allocates land for different types of development including housing, employment, and community facilities
- Once adopted, planning applications will be determined against the policies within the Local Plan

How is the Local Plan structured?

The local plan is divided into six key policy themes:

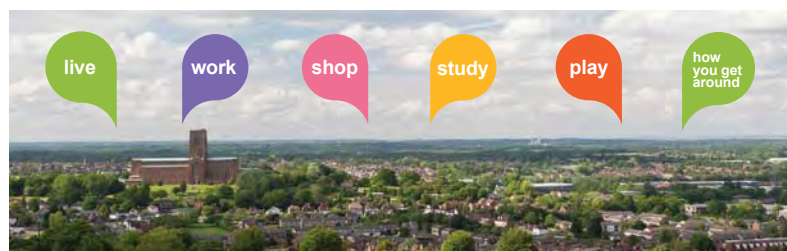
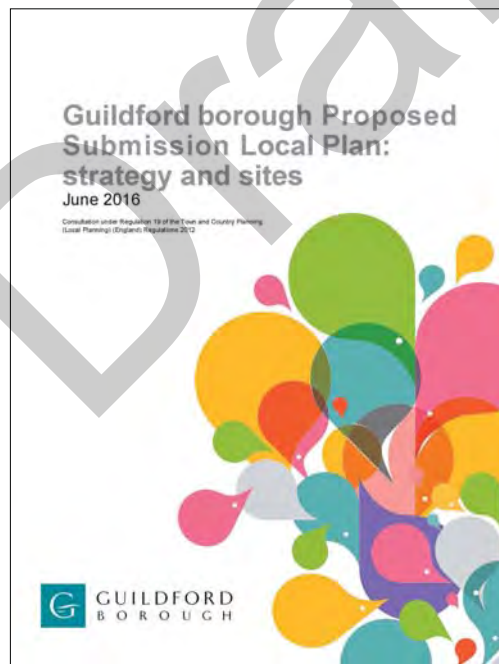
- Strategic Policies
- Housing Policies
- Protecting Policies
- Economy Policies
- Design Policies
- Infrastructure and Delivery Policies

Within each of these themes are the Local Plan policies. Each policy is structured in the same format:

- **The policy:** the Local Plan Policy. There are 27 policies in the Plan.
- **Key evidence:** a list of documents (i.e. guidance, assessments and reports) which have informed the policy
- **Monitoring indicators:** provides an indication of how the policy will be measured by setting out an indicator, target and data source.

Background to the Plan

- We started work on developing the Local Plan in 2012
- We consulted for 20 weeks during two rounds of Regulation 18 consultation
- The first round of consultation (Issues and Options) took place in October - November 2013. The consultation ran for eight weeks with over 20,000 comments received from over 5,000 people and organisations
- The second round of consultation on the Draft Local Plan 2014 took place between July and September 2014, ran for over 12 weeks with over 20,000 comments received from over 7,000 people and organisations. The comments received were assessed and significant revisions have been made to plan between 2014 and 2016





Welcome

Introduction to this consultation

Thank you for attending this information event, which forms part of our consultation on the Proposed Submission Local Plan.

We are consulting under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, under the regulations we must:

- Make available the Proposed Submission Local Plan and other proposed submission documents
- Provide you with an opportunity to comment on this version of the Local Plan, which the Council would like to adopt

The consultation runs for six weeks from 6 June to 18 July 2016

How to provide feedback

Feedback must be provided in writing and ideally via our **representation form**. This can be done in a number of ways:



- submitted on-line via the following web address: www.guildford.gov.uk/newlocalplan



- completed in-person at this event today



- emailed to localplan@guildford.gov.uk



- or posted to: Planning Policy Team, Guildford Borough Council offices, Millmead House, Millmead, Guildford, Surrey GU2 4BB

Documents available for review

- Guildford borough Proposed Submission Local Plan: strategy and sites
- Proposed Submission Local Plan: strategy and sites Appendix A to H
- Sustainability Appraisal (SA) 2016
- Sustainability Appraisal (SA) non-technical summary 2016
- Habitat Regulations Assessment (HRA) 2016
- Equalities Impact Assessment (EIA) Screening 2014
- Consultation Statement 2016
- Statement of Representations Procedure and Statement of Fact
- Evidence base
- Topic Papers

these documents are available to view at this exhibition

Locations where documents can be reviewed

- Guildford Borough Council reception
- Guildford Library
- Ash Library
- Horsley Library
- Shere Diamond Jubilee Library

Opening times for these venues and details of the other information events taking place as part of this consultation can be found at: www.guildford.gov.uk/newlocalplan



Learn more about the Proposed Submission Local Plan and ask our team questions

Have a chat to our team today

Don't forget to pick up a postcard so you have all the contact details.

Appendix 5:

**Proposed Submission Local Plan: Strategy and Sites
consultation (2016)**

Postcard

Draft



Be part of the plan

**Guildford Borough Council
Proposed Submission Local Plan Consultation
6 June to 18 July 2016**

 @GBCPlanning

 GBCLocalPlan

Be part of the plan | www.guildford.gov.uk/new/localplan



GUILD FORD
B O R O U G H

How to comment on the Proposed Submission Local Plan



Feedback must be provided in writing and ideally via our **representation form**. This can be done in a number of ways:

-  submitted on-line via the following web address: www.guildford.gov.uk/newlocalplan
-  completed in-person at this event today
-  emailed to localplan@guildford.gov.uk
-  or posted to: Planning Policy Team, Guildford Borough Council offices, Millmead House, Millmead, Guildford, Surrey, GU2 4BB

Please provide your comments by 11:59pm on 18 July



Be part of the plan | www.guildford.gov.uk/newlocalplan



GUILD FORD
B O R O U G H

Appendix 6:

Guildford borough press releases dated 17 May 2017 and 5 June 2017

Draft



Guildford Borough Council

www.guildford.gov.uk

Follow us [@GuildfordBC](https://twitter.com/GuildfordBC)

PR 9717

For Immediate Release

17 May 2017

Updated Local Plan – consultation starts 9 June

Help shape the borough's future by commenting on the significant and minor changes to the latest version of our Local Plan in the next consultation from 9 June – 24 July.

We will only be asking for comments about the proposed changes to the plan, as agreed by the Council at its meeting last night (Tuesday 16 May). Written feedback can be submitted in a variety of ways, as outlined below, and three public drop-in events are planned across the borough.

We will submit all of last year's consultation comments to the independent Planning Inspector, along with the responses to this summer's targeted regulation 19 consultation about the proposed changes.

Cllr Paul Spooner, Leader of the Council, says: "We continue to make progress in developing our new Local Plan to balance community needs and tackle local issues, wherever you live or work in our borough. Our next consultation, in June and July, is targeted on just the updates to the plan and is another opportunity to help shape the future by giving feedback about the specific changes we propose.

"We reviewed the comments from last year's consultation and made a number of significant changes to the plan and proposed sites, as well as updating the supporting evidence and policies. We remain committed to fundamental principles, such as our 'brownfield first' policy of proposing sites with past development, and some of the changes increase the number of homes in the town centre with reduced or removed housing sites in rural areas and greenbelt.

"The plan we submit for independent inspection will provide much-needed homes, jobs and leisure opportunities. As well as places to live and thrive, local people also need a great environment; with transport and other vital infrastructure to support them. We continue to work with our local and strategic partners on their supporting transport and other projects, which they must complete so we can deliver the Local Plan in full."

Get involved and be part of the plan

Here is a summary of how you can get involved in the public consultation.

We will also promote the latest details nearer the time and you can view more information about the new Local Plan at

www.guildford.gov.uk/newlocalplan

During the targeted consultation, from 12 noon on Friday 9 June - 12 noon on Monday 24 July 2017, we will only be asking for comments about the proposed changes to the plan.

These will be clearly shown in the updated plan documents (via tracked changes), along with summaries that highlight the changes in each policy.

Ways to view the documents

During the consultation, copies of the *Guildford borough Proposed submission Local Plan: strategy and sites (2017)* and its accompanying documents, including the representation form, will be available:

- to view on the Council's website at www.guildford.gov.uk/newlocalplan
- for inspection at Guildford Borough Council offices, Millmead House, Millmead, Guildford, Surrey GU2 4BB during office hours (excluding Bank Holidays).
- for inspection, during normal opening hours (excluding Bank Holidays) at Guildford Library, Ash Library, Horsley Library and Shere Diamond Jubilee Library.

Ways to submit written comments

Consultation feedback about the changes must be provided in writing and ideally via our representation form. Please ensure all comments clearly state and identify which paragraph number or policy they relate to in the Local Plan document.

You can do this in a number of ways:

- submit on-line at www.guildford.gov.uk/newlocalplan
- email to localplan@guildford.gov.uk
- post: to Planning Policy Team, Guildford Borough Council, Millmead House, Millmead, Guildford, GU2 4BB
- hand in at the consultation events.

Consultation event dates

We have also organised three public information drop-in events where the Planning Policy Team will be available to clarify the consultation process and copies of documents will be available to view:

- **East Horsley Village Hall** - Wednesday 14 June 2017 - between 1pm and 8pm
- **Tongham Community Centre** - Thursday 15 June 2017 - between 1pm and 8pm
- **Guildford Town Centre** at our Council offices at Millmead - Saturday 1 July 2017 - between 10am and 5pm

Past consultation and comments

All comments received in last year's regulation 19 pre-submission consultation about any unchanged aspects of the plan will remain valid, and will not be subject to further consultation.

We will submit all of last year's comments to the independent Planning Inspector, along with the responses to this summer's targeted regulation 19 consultation about the proposed changes.

Significant updates to the Draft Local Plan

These were made for good planning reasons based on past consultation comments or changes in circumstances or the supporting evidence - including:

- **reduced total housing target by 1,400 units** until end of plan period in 2034
- **reduced housing need from 693 to 654 units per year** – revised Objectively Assessed Need (OAN) for housing in updated Strategic Housing Market Assessment (SHMA): Guildford Addendum
- **sites removed completely from the plan – primarily for homes in rural areas** such as a large site in Normandy and Flexford for 1,100 residential units
- **updated sites with reduced numbers of homes during the plan period – primarily in green belt areas** such as Gosden Hill Farm and Blackwell Farm, with 300 fewer residential units at each site, due to phasing of delivery expected beyond 2034
- **updated sites with increased numbers of homes – primarily brownfield in the town centre** such as 200 more residential units on the North Street redevelopment
- **updated sites for student accommodation and Travelling Showpeople** – such as Guildford College changing from 100 homes to 200 student accommodation units instead and land at Garlick's Arch site that is now accommodating six Travelling Showpeople plots
- **new sites for employment floor space/industrial land** - such as land around Burnt Common warehouse is the new site for 7,000sqm of industrial land moved from the site at Garlick's Arch
- **new rail station at Guildford West, Park Barn** - is now included as a site allocation
- **reduced total growth requirements** from last year's Local Plan
 - Housing – by 1,400 units
 - Office and research and development floor space – by between 1,100 and 3,500sqm
 - Industrial employment land – by between 1 and 1.2 hectares
 - Comparison retail floor space – by 5,955 sq m (meeting needs to 2030 due to uncertainties in the long term forecasting).

Ends

Notes to Editor

Press contact: Carolyn Patterson, Communications and PR Manager, tel: 01483 444338 or e-mail: carolyn.patterson@guildford.gov.uk

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Guildford Borough Council

www.guildford.gov.uk

Follow us [@GuildfordBC](https://twitter.com/GuildfordBC)

PR 9718

For Immediate Release

05 June 2017

Shaping your future – updated Local Plan consultation starts this Friday 9 June

We want your feedback on the updates in our latest Draft Local Plan, which aims to balance community needs and tackle local issues, wherever you live or work in our borough.

In the latest consultation, from 9 June – 24 July, we will only be asking for comments about the proposed changes to the plan, as agreed by the Council in May. You can submit written feedback in a variety of ways, as outlined below. Please ensure all comments clearly state and identify which paragraph number or policy they relate to in the Local Plan document.

We will submit all of last year's consultation comments to the independent Planning Inspector, along with the responses to this summer's targeted regulation 19 consultation about the proposed changes.

Cllr Paul Spooner, Leader of the Council, says: "After reviewing the comments from last year's consultation, we made a number of significant changes to the plan and proposed sites, as well as updating the supporting evidence and policies. Our wide-ranging consultation, starting this Friday 9 June, gives another opportunity to help shape the borough's future by commenting on the amendments in the latest version of our Draft Local Plan.

"Across our whole borough, people need places to live and thrive, with a great environment, transport and other vital infrastructure to support them. We remain committed to fundamental principles, such as our 'brownfield first' policy of proposing sites with past development, minimising development in Green Belt, protecting our Areas of Outstanding Natural Beauty (AONB) and some of the changes increase the number of homes in the town centre with reduced or removed housing sites in rural areas and Green Belt. We also remain committed to ensuring the necessary infrastructure is delivered to support the Local Plan. This means that our local and strategic partners must also complete their transport and other projects, so we can deliver the Local Plan in full.

"The plan we submit for independent inspection will provide much-needed homes, jobs and leisure opportunities and this consultation is another chance to get involved."

Be part of the plan and get involved

During the targeted consultation, from 12 noon on Friday 9 June - 12 noon on Monday 24 July 2017, we will only be asking for comments about the proposed changes to the plan.

These will be clearly shown in the updated plan documents (via tracked changes), along with summaries that highlight the changes in each policy.

You can view more information and submit your comments about changes to the new Local Plan at

www.guildford.gov.uk/newlocalplan

Ways to view the documents

During the consultation, copies of the *Guildford borough Proposed Submission Local Plan: strategy and sites (2017)* and its accompanying documents, including the representation form, will be available:

- **to view on the Council's website:** at www.guildford.gov.uk/newlocalplan
- **for inspection at the Council's offices:** Millmead House, Millmead, Guildford, Surrey GU2 4BB during office hours (excluding Bank Holidays)
- **for inspection at libraries:** Guildford Library, Ash Library, Horsley Library and Shere Diamond Jubilee Library during normal opening hours (excluding Bank Holidays).

Ways to submit written comments about the changes

Consultation feedback about the changes must be provided in writing and ideally via our representation form. Please ensure all comments clearly state and identify which paragraph number or policy they relate to in the Local Plan document.

You can do this in a number of ways:

- **submit on-line:** at www.guildford.gov.uk/newlocalplan
- **email:** to localplan@guildford.gov.uk
- **post:** to Planning Policy Team, Guildford Borough Council, Millmead House, Millmead, Guildford, GU2 4BB
- **hand in:** at the consultation events.

Consultation events

We have also organised three public information drop-in events. The Planning Policy Team will be available to clarify the consultation process and you can view copies of the documents.

- **East Horsley Village Hall** - Wednesday 14 June 2017 - between 1pm and 8pm
- **Tongham Community Centre** - Thursday 15 June 2017 - between 1pm and 8pm
- **Guildford Town Centre** at our Council offices at Millmead - Saturday 1 July 2017 - between 10am and 5pm

Past consultation and comments

All comments received in last year's regulation 19 pre-submission consultation about any unchanged aspects of the plan will remain valid, and will not be subject to further consultation.

We will submit all of last year's comments to the independent Planning Inspector, along with the responses to this summer's targeted regulation 19 consultation about the proposed changes.

Significant updates to the Draft Local Plan

These were made for good planning reasons - based on past consultation comments or changes in circumstances or the supporting evidence - including:

- **reduced total housing target by 1,400 units** until end of plan period in 2034
- **reduced housing need from 693 to 654 units per year** – revised Objectively Assessed Need (OAN) for housing in updated Strategic Housing Market Assessment (SHMA): Guildford Addendum
- **sites removed completely from the plan – primarily for homes in rural areas** such as a large site in Normandy and Flexford for 1,100 residential units
- **updated sites with reduced numbers of homes during the plan period – primarily in green belt areas** such as Gosden Hill Farm and Blackwell Farm, with 300 fewer residential units at each site, due to phasing of delivery expected beyond 2034
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- **new sites for employment floor space/industrial land** - such as land around Burnt Common warehouse is the new site for 7,000sqm of industrial land moved from the site at Garlick’s Arch
- **new rail station at Guildford West, Park Barn** - is now included as a site allocation
- **reduced total growth requirements** from last year’s Local Plan
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 - Industrial employment land – by between 1 and 1.2 hectares
 - Comparison retail floor space – by 5,955 sq m (meeting needs to 2030 due to uncertainties in the long term forecasting).

Ends

Notes to Editor

Press contact: Carolyn Patterson, Communications and PR Manager, tel: 01483 444338 or e-mail: carolyn.patterson@guildford.gov.uk

For all the latest Guildford Borough Council news go to www.guildford.gov.uk and follow us on Twitter @GuildfordBC

Appendix 7:

**Proposed Submission Local Plan: Strategy and Sites
consultation (2017)**

Questionnaire and Comments Form

Draft

Guildford Borough Council

Proposed Submission Local Plan: strategy and sites (2017)

Consultation questionnaire and representation form

Guildford Borough Council is inviting representations on the **proposed changes** in the Proposed Submission Local Plan: strategy and sites (2017). This questionnaire asks questions about the proposed changes to the document **as a whole** and the documents that have informed and supported the plan. If you would like to make comments about the proposed changes to **a particular section** of the document, please use the representation forms at **Appendix 1** of this questionnaire.

The questionnaire and representation form both ask questions about **legal compliance, soundness, and compliance with the Duty to cooperate**. For more information about the meaning of legal compliance, soundness and the Duty to cooperate, please read the guidance notes at **Appendix 2** of this questionnaire.

Please note that verbal comments cannot be taken into consideration. We cannot accept anonymous comments and ask that you provide your name and postal and/or email address as a minimum. Your comments and your name will be published when the consultation is complete, but personal information will be kept confidential.

We will collate and analyse all the comments received, and produce a written summary of all representation. We will then progress the Local Plan towards submission to the Planning Inspectorate for examination. Your comments will be made available to the Inspector who examines the plan.

	Your details	Agent's details (if applicable)
Title	Mr Mrs Miss Ms Other _____	Mr Mrs Miss Ms Other _____
First Name		
Last Name		
Job title and/or organisation (if relevant)		
Address		
Telephone		
Email		

Question 1: The evidence base and submission documents

The Proposed Submission Local Plan: strategy and sites (2017) is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D of the plan and can be found on our website at <http://www.guildford.gov.uk/newlocalplan/evidencebase>.

With regard to the proposed changes to the plan and evidence produced or updated since 18 July 2016, do you agree that the evidence used for the Proposed Submission Local Plan: strategy and sites (2017) is adequate, up-to-date and relevant? Yes No

If you make a comment about a specific evidence base document, please tell us which document you are commenting on.

Comment:

Question 2: Legal Compliance

With regard to the proposed changes to the plan, do you consider the Proposed Submission Local Plan: strategy and sites (2017) as a whole is legally compliant? Yes No

Please provide the following information being as precise as possible:

- why you consider it is or is not legally compliant and
- what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the case.

Comment:

Question 3: Soundness

With regard to the proposed changes to the plan, do you consider the Proposed Submission Local Plan: strategy and sites (2017) as a whole is sound? Yes No

Please provide the following information being as precise as possible:

- why you consider it is or is not sound and
- what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

Comment:

Question 4: Duty to cooperate

With regard to the proposed changes to the plan, do you consider the Proposed Submission Local Plan: strategy and sites (2017) as a whole has complied with the Duty to cooperate? Yes No

Please provide the following information being as precise as possible:

- why you consider it has or has not complied with the Duty to cooperate and
- what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this is the case.

Comment:

Question 5: The content of the plan

Please have your say about the proposed changes to individual sections of the plan. See the attached representation forms at **Appendix 1** of this questionnaire.

Question 6: Any other comments?

Do you have any other comments that have not been covered by the previous questions? Yes No

Please note, comments can only be considered where they relate to proposed changes to the plan or documents that have been produced or updated since July 18 2016.

Comment:

Draft

Appendix 1: Question 5 - Representation form

Please use this form to make comments about particular sections of the Proposed Submission Local Plan (2017): strategy and sites. Please use one form for each paragraph, section, policy and/or map you are commenting on, using as many copies of the form (or additional blank sheets) as you need.

NOTE: Representations should only be made on proposed changes to the Local Plan.

Changes within the Local Plan are shown as tracked changes. The tracked changes identify new text in red and underlined (new text looks like this) and identify deleted text in red and struck through (~~deleted text looks like this~~).

All changes on the maps are identified by yellow boxes.

The red text and yellow boxes are the changes in the Plan that you are invited to comment on.

All previous comments received during the Guildford Borough Proposed Submission Local Plan: strategy and sites (2016) Regulation 19 consultation held in June and July 2016 about any unchanged aspects of the Plan will remain valid, and unchanged elements of the plan will not be subject to further consultation. All representations received in 2016, alongside those representations received in 2017 that relate to proposed changes, will be submitted to the Planning Inspector.

We cannot accept anonymous comments so please append this form to your questionnaire or write your name and contact details (at least an email and/or postal address) clearly at the top of the page.

To which changed section of the plan (paragraph/policy/map/table) does this comment relate?

Para. Policy Map Table

Do you consider this section of the plan is legally compliant? Yes No
Do you consider this section of the plan is sound? Yes No
Do you consider this section of the document complies with the Duty to cooperate? Yes No

If you answered "No" to any of the questions above, please give details in the box below of why you consider this section of the document not to be legally compliant and/or unsound and/or does not comply with the Duty to cooperate. Please be as precise as possible.

Remember your comments must relate to proposed changes only.

Comment:

What amendment(s) do you think should be made to this proposed change to the document? It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. If you are proposing an amendment to make the proposed change legally compliant, sound, or comply with the Duty to cooperate, you will need to say why this further amendment will make the document legally compliant, sound or comply with the Duty to cooperate.

What further amendments do you suggest should be made to the document?

Draft

Thank you for completing this form.

If you would like to participate in the Examination in Public, expressions of interest must be made via the programme officer at the relevant time. More details will become available on our website (www.guildford.gov.uk/newlocalplan) closer to the examination.

Question 5 - Representation form

Please use this form to make comments about particular sections of the Proposed Submission Local Plan (2017): strategy and sites. Please use one form for each paragraph, section, policy and/or map you are commenting on, using as many copies of the form (or additional blank sheets) as you need.

NOTE: Representations should only be made on proposed changes to the Local Plan.

Changes within the Local Plan are shown as tracked changes. The tracked changes identify new text in red and underlined (new text looks like this) and identify deleted text in red and struck through (~~deleted text looks like this~~).

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We cannot accept anonymous comments so please append this form to your questionnaire or write your name and contact details (at least an email and/or postal address) clearly at the top of the page.

To which changed section of the plan (paragraph/policy/map/table) does this comment relate?

Para. Policy Map Table

Do you consider this section of the plan is legally compliant?

Yes No

Do you consider this section of the plan is sound?

Yes No

Do you consider this section of the document complies with the Duty to cooperate?

Yes No

If you answered "No" to any of the questions above, please give details in the box below of why you consider this section of the document not to be legally compliant and/or unsound and/or does not comply with the Duty to cooperate. Please be as precise as possible.

Remember your comments must relate to proposed changes only.

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Draft

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Question 5 - Representation form

Please use this form to make comments about particular sections of the Proposed Submission Local Plan (2017): strategy and sites. Please use one form for each paragraph, section, policy and/or map you are commenting on, using as many copies of the form (or additional blank sheets) as you need.

NOTE: Representations should only be made on proposed changes to the Local Plan.

Changes within the Local Plan are shown as tracked changes. The tracked changes identify new text in red and underlined (new text looks like this) and identify deleted text in red and struck through (~~deleted text looks like this~~).

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All previous comments received during the Guildford Borough Proposed Submission Local Plan: strategy and sites (2016) Regulation 19 consultation held in June and July 2016 about any unchanged aspects of the Plan will remain valid, and unchanged elements of the plan will not be subject to further consultation. All representations received in 2016, alongside those representations received in 2017 that relate to proposed changes, will be submitted to the Planning Inspector.

We cannot accept anonymous comments so please append this form to your questionnaire or write your name and contact details (at least an email and/or postal address) clearly at the top of the page.

To which changed section of the plan (paragraph/policy/map/table) does this comment relate?

Para. Policy Map Table

Do you consider this section of the plan is legally compliant?

Yes No

Do you consider this section of the plan is sound?

Yes No

Do you consider this section of the document complies with the Duty to cooperate?

Yes No

If you answered "No" to any of the questions above, please give details in the box below of why you consider this section of the document not to be legally compliant and/or unsound and/or does not comply with the Duty to cooperate. Please be as precise as possible.

Remember your comments must relate to proposed changes only.

Comment:

What amendment(s) do you think should be made to this proposed change to the document? It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. If you are proposing an amendment to make the proposed change legally compliant, sound, or comply with the Duty to cooperate, you will need to say why this further amendment will make the document legally compliant, sound or comply with the Duty to cooperate.

What further amendments do you suggest should be made to the document?

Draft

Thank you for completing this form.

If you would like to participate in the Examination in Public, expressions of interest must be made via the programme officer at the relevant time. More details will become available on our website (www.guildford.gov.uk/newlocalplan) closer to the examination.

Appendix 2: Legal compliance, soundness and Duty to cooperate guidance notes.

Local Plans set planning policies in local authority areas and form the starting point when deciding planning applications. Independent planning inspectors must examine the 'soundness' of plans through an Examination, which can include public meetings called 'hearings'.

The process of producing a Local Plan should fully involve everyone who has an interest in the document and at the end of the process they should have had the chance to comment and, where appropriate, appear at any relevant hearing sessions of the Examination to present their case.

In summary, the Inspectors will be considering three questions:-

1. Is the plan legally compliant?

During an Examination the Inspector will first check that the Plan meets the legal requirements of the relevant Planning Acts and Regulations. A plan is considered legal when it complies with the legal requirements under section 20(5) (a) of the Planning and Compulsory Purchase Act 2004 (as amended). Relevant to this issue (but not exhaustively) is whether the Plan in question:

- Has had regard to national policy and guidance issued by the Secretary of State
- has been prepared in-line with our Local Development Scheme. The LDS is effectively a programme of work prepared by the Council, setting out the documents to be produced. It sets out the key stages in the production of any documents the Council propose to bring forward for independent examination. The LDS can be found online at www.guildford.gov.uk/newlocalplan/lds.
- complies with the Town and County Planning (Local Planning) (England) Regulations 2012. On submission of the Local Plan, the Council must publish the documents prescribed in the regulations, and make them available at their principal offices and on their website.
- Whether the appropriate notifications have been made.
- Whether a Sustainability Appraisal assessing social, environmental and economic factors has been done and made public. The Sustainability Appraisal is a tool for appraising the plan to ensure it reflects social, environmental, and economic factors.
- Whether the plan meets the requirements of the Habitats Directive and the Conservation of Habitats and Species Regulations 2010 (as amended).

2. Is the plan sound?

To meet the Test of Soundness, the independent Planning Inspector is required to consider if our Local Plan has been **positively prepared**, is **justified** and **effective** and is **consistent with national policy**.

The following points are relevant when considering legal compliance, as set out in paragraph 182 of the National Planning Policy Framework. To be sound, a plan should be:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities and

- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

3. Has the plan complied with the Duty to cooperate?

A legal duty has been placed on local planning authorities, county councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters.

Section 20(5) (c) of the Planning and Compulsory Purchase Act 2004 (as amended) and paragraphs 178-181 of the National Planning Policy Framework create a duty on all local planning authorities and other bodies to cooperate with each other to address strategic issues in the preparation of the Local Plan. The National Planning Practice Guidance sets out further information on the Duty to cooperate.

The National Planning Policy Framework and the National Planning Practice Guidance can be found at <http://planningguidance.communities.gov.uk>.

Draft

Name:

Email:

Address:

Guildford borough

Proposed Submission Local Plan: strategy and sites (2017)

Regulation 19 Targeted consultation

Representation form

Please use this form to make comments about particular sections of the Proposed Submission Local Plan (2017). Please use one form for each paragraph, section, policy and/or map you are commenting on, using as many copies of the form (or additional blank sheets) as you need.

NOTE: Representations should only be made on proposed changes to the Local Plan.

Changes within the Local Plan are shown as tracked changes. The tracked changes identify new text in red and underlined (new text looks like this) and identify deleted text in red and struck through (~~deleted text looks like this~~).

All changes on the maps are identified by yellow boxes.

The red text and yellow boxes are the changes in the Plan that you are invited to comment on.

All previous comments received during the Guildford Borough Proposed Submission Local Plan: strategy and sites (2016) Regulation 19 consultation held in June and July 2016 about any unchanged aspects of the Plan will remain valid, and unchanged elements of the plan will not be subject to further consultation. All representations received in 2016, alongside those representations received in 2017 that relate to proposed changes, will be submitted to the Planning Inspector.

We cannot accept anonymous comments so please write your name and contact details (at least an email and/or postal address) clearly at the top of the page.

To which changed section of the plan (paragraph/policy/map/table) does this comment relate?

Para. Policy Map Table

Do you consider this section of the plan is legally compliant? Yes No

Do you consider this section of the plan is sound? Yes No

Do you consider this section of the document complies with the Duty to cooperate? Yes No

If you answered "No" to any of the questions above, please give details in the box below of why you consider this section of the document not to be legally compliant and/or unsound and/or does not comply with the Duty to cooperate. Please be as precise as possible.

Remember your comments must relate to proposed changes only.

Comment:

What amendment(s) do you think should be made to this proposed change to the document? It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. If you are proposing an amendment to make the proposed change legally compliant, sound, or comply with the Duty to cooperate, you will need to say why this further amendment will make the document legally compliant, sound or comply with the Duty to cooperate.

What further amendments do you suggest should be made to the document?

Draft

Thank you for completing this form.

If you would like to participate in the Examination in Public, expressions of interest must be made via the programme officer at the relevant time. More details will become available on our website (www.guildford.gov.uk/newlocalplan) closer to the examination.

Appendix 8:

**Proposed Submission Local Plan: Strategy and Sites
consultation (2017)**

Postcard

Draft



Be part of the plan

Proposed Submission Local Plan: strategy and sites (2017)
Regulation 19 Targeted Consultation
9 June to 24 July 2017



Be part of the plan | www.guildford.gov.uk/new/localplan



GUILD FORD
B O R O U G H

How to comment on changes to the Guildford borough Proposed Submission Local Plan: strategy and sites (2017)

Only comments about proposed changes to the Plan will be passed on to the Planning Inspector. All changes on the maps are highlighted within yellow boxes. Within the document changes are shown as tracked changes which identify new text in red and underlined (new text looks like this) and deleted text in red and struck through (~~deleted text looks like this~~).

Feedback must be provided in writing and ideally via our **representation form**. This can be done in a number of ways:

-  submitted on-line via the following web address: www.guildford.gov.uk/newlocalplan
-  emailed to localplan@guildford.gov.uk
-  or posted to: Planning Policy Team, Guildford Borough Council, Millmead House, Millmead, Guildford, GU2 4BB

Please provide your comments by 12 noon on Monday 24 July 2017

Be part of the plan | www.guildford.gov.uk/newlocalplan



GUILDFORD
BOROUGH

Appendix 9:

**Proposed Submission Local Plan: Strategy and Sites
consultation (2017)**

Information Boards

Draft



How to provide feedback

Feedback must be provided in writing and ideally online via our representation form. This can be done in a number of ways:



Submitted on-line at: www.guildford.gov.uk/newlocalplan



Emailed to: localplan@guildford.gov.uk



Or posted to:
Planning Policy Team, Guildford Borough Council, Millmead House, Millmead, Guildford, GU2 4BB

Please provide your comments by 12 noon on Monday 24 July 2017

- We strongly recommend using the **standard representation form**. This will ensure that comments are related to matters relevant to the subsequent examination of the Local Plan by a Planning Inspector.
- Please ensure all comments clearly state which **paragraph number or policy** of the Local Plan they relate to.
- If comments relate to updated supporting documents or updated evidence base this should be made clear.
- **Representations should only be made on proposed changes to the Local Plan.** The changes are highlighted in **red** in the document, or within yellow boxes on the maps.
- All previous comments received during the Proposed Submission Local Plan (2016) Regulation 19 consultation held in June and July 2016 about any unchanged aspects of the Plan will remain valid, and unchanged wording will not be subject to further consultation. All representations received in 2016 alongside those representations received in 2017 that relate to proposed changes will be submitted to the Planning Inspector.

What happens next?

- 1) Once this period of consultation is complete all responses will be recorded and analysed and if necessary the Local Plan will be amended. If the proposed changes are minor in nature Guildford Borough Council will then submit the Plan to the Planning Inspectorate. This is expected to happen in December 2017.
- 2) An Inspector will then be appointed to examine the Local Plan documents. An Inspector's role is to consider the soundness and legal compliance of the Plan, based on the relevant legislation and the guidance of the National Planning Policy framework (NPPF). In doing so, the Inspector must deem the Plan to be deliverable - and the most appropriate strategy when considered against the reasonable alternatives.
- 3) The Inspector will prepare a report which recommends whether the Local Plan should be adopted or not. If the document is found to be unsound, the Inspector will recommend modifications.

More information on the Proposed Submission Local Plan: strategy and sites can be found at:
www.guildford.gov.uk/newlocalplan





Updates to evidence base documents

Four of the evidence based documents have been updated and three new ones have been added. This list (below) provides a description of the key updates which influenced the Plan and how to access them:

West Surrey Strategic Housing Market Assessment (SHMA) Guildford Addendum 2017

The SHMA Addendum sits alongside and supplements the West Surrey SHMA (2015). It provides a factual update for Guildford to include consideration of the most up to date population and household projections; economic projections; and mid-year population estimate.

Available online: www.guildford.gov.uk/newlocalplan/shma

Employment Land Needs Assessment (ELNA) 2017

This is an update to the previous ELNA (2015) with the latest full set of projections, following the referendum on Britain's membership of the European Union. These projections have also fed into the SHMA Addendum.

Available online: www.guildford.gov.uk/newlocalplan/economy

Retail and Leisure Needs Study Addendum 2017

This sits alongside and supplements the Retail and Leisure Study update 2014. It provides a factual update to include the latest population projections and Experian forecasts.

Available online: www.guildford.gov.uk/newlocalplan/economy

Travellers Accommodation Assessment (TAA)

The update take account of recent changes in legislation and an updated survey.

Available online: www.guildford.gov.uk/newlocalplan/TAA

Water Quality Assessment

The Water Quality Assessment provides an assessment of the impact of local plan proposals on water quality by examining impacts on wastewater infrastructure. This has been prepared to address comments raised by the Environment Agency.

Available online: www.guildford.gov.uk/newlocalplan/infrastructureanddelivery

Air Quality Assessment

The Air Quality Assessment considers the potential effect of the growth proposed in the Local Plan on air quality.

Available online: www.guildford.gov.uk/newlocalplan/protectinganddesign

Assessment of the Viability of Carbon Emission Targets for New Builds

This report examines the cost and feasibility of reducing carbon emissions in new buildings by 10%, 15% and 20% below Building Regulations standards. This work supports Policy D2: Sustainable design, construction and energy.

Available online: www.guildford.gov.uk/newlocalplan/infrastructureanddelivery

Land Availability Assessment 2017 Addendum

The LAA 2017 Addendum sits alongside and supplements the LAA published in 2016, superseding some of the information within it. Two new sites have been added, a number have been removed and capacities and phasing have been updated on others. It includes the updated five-year housing land supply at 1 April 2017 and the updated housing trajectory.

Available online: www.guildford.gov.uk/newlocalplan/housing

Guildford Local Plan and CIL Viability Study

This document sets out how the policy requirements of the Local Plan and other planning requirements would impact on the viability of planned developments.

Available online: www.guildford.gov.uk/newlocalplan/infrastructureanddelivery

Open Space, Sports and Recreation Assessment (2017)

This assessment audits the current provision of open space, sports and recreation land and facilities to identify areas of deficit. This information will be used to guide development proposals and protect land of public value for sports, recreation and amenity.

Available online: www.guildford.gov.uk/newlocalplan/infrastructureanddelivery

Guildford Assessment of Sites for Amenity Value (2017)

This assessment was undertaken to assess land proposed to be inset from the green belt to see if it has public amenity value and should be protected from development.

Available online: www.guildford.gov.uk/newlocalplan/infrastructureanddelivery





Key changes to sites

There have been key changes to allocated sites since the previous Regulation 19 consultation. These include the removal of certain sites and the allocation of new ones, as well as changes to the total number of homes that each site can accommodate. The table below shows those sites where a significant change has taken place:

Site allocation reference	Site	Ward	Allocated uses	Gross number of homes (approx.) over the plan period	Reason for change
Guildford Town Centre					
A4	Telephone-Exchange, Leasdale Road, Guildford	Friary and St-Nicolas	Homes (C3)	100	Deleted allocation as landowner confirmed site unlikely to be available until end of Local Plan period.
A6	North Street redevelopment, Guildford	Friary and St Nicolas	Comprehensive mixed use redevelopment	200 400	Increased from 200 to 400 homes with acknowledgement that through master planning of the site priority will be delivery of 41,000 sq m of retail floorspace.
Guildford urban area					
A18	Land at Guildford college, Guildford	Christchurch	Student accommodation (sui generis) Homes (C3) and D1 floorspace	100 200 student bedspaces	Site promoters have confirmed that they intend to progress student accommodation on the site rather than general housing.
A25	Gosden Hill Farm, Merrow Lane, Guildford	Burpham and Clandon and Horsley	Mixed use development	2000 1,700	Reduced delivery target within the plan period to allow for more realistic phasing, taking into account timing of infrastructure delivery (A3 improvement scheme). Total capacity unchanged.
A26	Blackwell Farm, Hogs Back, Guildford	Shalford and Worplesdon	Mixed use development	1,800 1,500	Reduced delivery target within the plan period to allow for more realistic phasing, taking into account timing of infrastructure delivery (A3 improvement scheme). Total capacity unchanged.
A59	New rail station at Guildford West (Park Barn)	Westborough, Onslow and Worplesdon	New rail station		A new rail station was included in Appendix C of the 2016 Reg. 19 Local Plan. This has been included as an allocation to aid clarity.
Ash and Tongham					
A29	Land to the south and east of Ash and Tongham	Ash South and Tongham, Ash Wharf	Homes (C3) and new road and footbridge	1,200 1,750	Site allocation increased to include planning permissions in this area that have not yet commenced.
A30	Land for Ash-railway station-level crossing-closure and new-bridge scheme	Ash-South-and-Tongham	New road-bridge-and-footbridge		Included in site allocation A29.
Previously Development Land in the Green Belt					
A34	Broadford-Business-Park, Shalford	Shalford	Homes (C3)	100	Retaining as business park to offset past and anticipated future loss of office floorspace on other sites.
Villages					
A36	Hotel, Guildford-Road, East Horsley	Clandon-and-Horsley	Homes (C3)	48	Recent planning appeal concluded insufficient evidence to justify loss of hotel.
A41	Land to the south of West Horsley	Clandon-and-Horsley	Homes (C3)	90	Potential to use site A41 for relocation of Raleigh School and playing fields, however present uncertainty over deliverability of this proposal, therefore proposed to retain as Green Belt.
A43	Land at Garlick's Arch, Send Marsh Burnt Common and Ripley	Send and Lovelace	Homes (C3) and Travelling Showpeople plots (sui generis) employment-floorspace (B1c, B2, B8)	400	Removed industrial element due to concerns raised during the previous consultation over allocating a site for both housing and industrial uses. The Travelling Showpeople plots lost from site A46 (below) are now allocated on this site.
A46	Land to the south of Normandy and north of Flexford	Normandy	Mixed-used-development	1100	Site is high sensitivity Green Belt and was only previously allocated because of its potential to accommodate a secondary school. This school is now proposed to be accommodated on site A26 (Blackwell Farm), which is preferable in relation to school place planning and sustainability perspectives.
A47	Land to east of The Paddocks, Flexford	Normandy	Homes (C3)	50	Site to be retained as a Site of Nature Conservation Importance (SNCI) due to the importance of its semi-improved grassland habitat.
A58	Land around Burnt Common warehouse, London Road, Send	Send	Employment floorspace (B1c, B2, B8)		New site proposed to be allocated for the 7,000 sq. m industrial land previously proposed on site A43 (Garlick's Arch). Site A58 is adjacent to an existing industrial use and in a less sensitive location to accommodate the proposed uses.
Traveller and Travelling Showpeople Accommodation					
A48	Land at Home Farm, Effingham	Effingham	Traveller-pitches (sui generis)	6	Site already has planning permission for six rural exception traveller sites which are currently being constructed. Therefore it is no longer necessary to allocate.



Key changes to policy

The table below summarises the key changes to policy since the previous Regulation 19 consultation.

Updates	Detail
Time period of Local Plan	<ul style="list-style-type: none"> The period for the Local Plan has been altered to ensure a 15 year lifespan from the date of adoption. Now anticipated to run from December 2018 – and end in 2034.
Reduced total growth requirements from last year's Proposed Submission Local Plan	<ul style="list-style-type: none"> Housing target reduced by 1,400 units. Office and research and development floorspace reduced by between 1,100 and 3,500sqm. Industrial employment land reduced by between 1 and 1.2 hectares. Comparison retail floorspace reduced by 5,955sqm (meeting needs to 2030 due to uncertainties in the long term forecasting). Total housing supply reduced by 2,000 within the plan period.
Housing need has fallen from 693 to 654 units per year	<ul style="list-style-type: none"> Revised Objectively Assessed Need (OAN) for housing in the updated West Surrey Strategic Housing Market Assessment (SHMA): Guildford Addendum.
Sites removed completely from the Plan - primarily homes in rural areas	<ul style="list-style-type: none"> Includes removal of a large site in Normandy and Flexford for 1,100 residential units.
Updated sites with realistic phasing meaning reduced numbers of homes being delivered during the plan	<ul style="list-style-type: none"> Includes Gosden Hill Farm and Blackwell Farm, with 300 fewer residential units at each site, due to phasing of delivery expected beyond 2034.
Updated sites with increased numbers of homes	<ul style="list-style-type: none"> Primarily brownfield sites in the town centre such as 200 more homes on the North Street redevelopment.
Updated sites for student accommodation and Travelling Showpeople	<ul style="list-style-type: none"> E.g. Guildford College changing from 100 homes to 200 student accommodation units instead and land at Garlick's Arch site that is now accommodating six Travelling Showpeople plots.
New sites for employment floorspace/industrial land	<ul style="list-style-type: none"> Land around Burnt Common warehouse is the new site for 7,000sqm of industrial land moved from the site at Garlick's Arch.
New rail station at Guildford West, Park Barn	<ul style="list-style-type: none"> Now included as a site allocation.
Minimum space standards	<ul style="list-style-type: none"> New development to meet national space standards.
Self-build	<ul style="list-style-type: none"> On development sites of 100 homes or more 5% shall be for self-build plots.
Wheelchair accessible homes	<ul style="list-style-type: none"> Residential developments of over 25 homes to provide a percentage of wheelchair accessible and adaptable homes.





Local Plan documentation

All changes on the maps are highlighted within yellow boxes. Within the document changes are shown as tracked changes. The tracked changes identify new text in red and underlined (**new text looks like this**) and deleted text in red and struck through (~~deleted text looks like this~~).

This red text and yellow boxes are the changes in the Plan which you are invited to comment on.

Example: Policy excerpt with tracked changes showing both deleted and inserted text.

POLICY H3: Rural exception homes

(1) **Small affordable housing developments, including pitches for travellers, will be permitted to meet identified local affordable housing needs provided that:**

- (a) **the site adjoins or is closely related to, and in safe and easy reasonable walking distance of a defined or a non-defined rural settlement, and**
- (b) **the number, size and tenure of homes would be appropriate to meet, or to contribute to meeting, the identified local affordable housing needs of the local community, and**
- (c) **the affordable homes are all secured as affordable homes in perpetuity.**

Comments should only be made on proposed changes to the Local Plan.

This includes:

- Changes to policy wording
- Removed sites / newly allocated sites
- Amendments to wording within site allocation policies
- Updates to the evidence based documents

Significant updates to the Proposed Submission Local Plan

Key changes have been made to the Plan following previous consultation feedback, changes in circumstances and/or the supporting evidence. These key changes are summarised below:

	Proposed Submission Local Plan: strategy and sites (2016)	Proposed Submission Local Plan: strategy and sites (2017)
Period of Local Plan	2013 - 2033	2015 - 2034
Housing	13,860	12,426
Office and research and development floorspace	37,200 - 47,200 m ²	36,100 - 43,700 m ²
Industrial employment land	4.7 - 5.3 hectares	3.7 - 4.1 hectares
Comparison retail floorspace	46,955 m ^{2*} <i>*due to uncertainties in forecasting over the longer term we were proposing to meet needs to 2029</i>	41,000 m ^{2***} <i>**due to uncertainties in forecasting over the longer term we're proposing to meet needs to 2030</i>
Gypsy and traveller pitches	73 pitches	- 4 pitches for Gypsies and Travellers as defined by Planning Policy for Traveller Sites (PPTS) - 41 pitches for Gypsies and Travellers who do not meet the PPTS definition - 8 pitches to meet potential additional need of households of unknown planning status
Travelling Showpeople plots	8 plots	- 4 plots for Travelling Showpeople as defined by Planning Policy for Traveller Sites (PPTS) - 4 plots for Travelling Showpeople who do not meet the PPTS definition



Welcome

Introduction to this consultation

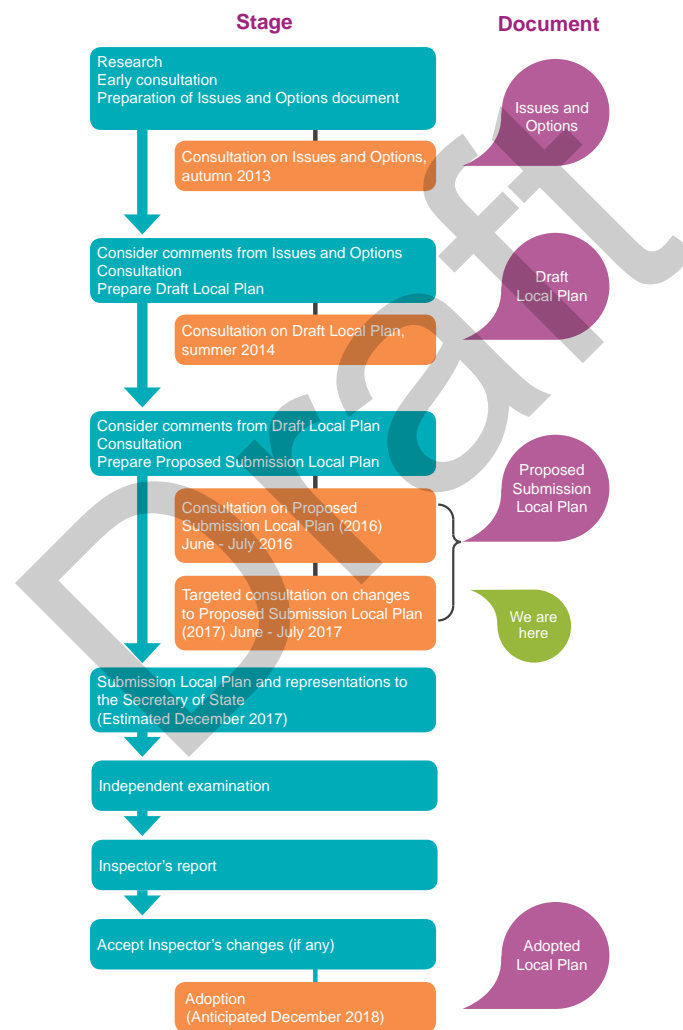
Thank you for attending this information event, which provides an opportunity to find out more about the Proposed Submission Local Plan: strategies and sites.

We are consulting under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, under the regulations we must:

- Make available the Proposed Submission Local Plan and other proposed submission documents.
- Provide you with an opportunity to comment on this version of the Local Plan, which the Council would like to adopt.

This consultation will run for six weeks from 9 June to 24 July 2017

Stages of preparing the Local Plan: strategy and sites



Consultation to date

- The above diagram shows the progression of the Local Plan to date and how we have got to where we are today.
- Last year we undertook a period of consultation from 6 June – 18 July 2016 on the Proposed Submission Local Plan.
- During this period over 32,000 comments were recorded, from over 6,000 people or organisations, all of which have been considered and will be sent alongside the plan to the Planning Inspector.
- In light of the representations received and the updated evidence base we are proposing to make a number of changes to the Local Plan. We need to consult on these changes before we submit the Plan to the Planning Inspectorate.

Appendix 10:

Main Issues (Regulation 19 consultations)

Draft

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Please note:

Both Question 1 of the Questionnaire and Appendix D concern representations made about the Local Plan evidence base. These representations are answered together in Appendix D only.

Both Question 6 in the 2016 Questionnaire and Question 5 in the 2017 Questionnaire asked for representations about the sections, policies and sites in the Proposed Submission Local Plan. These representations are answered in the relevant section of this Appendix.

Introduction

No main issues.

Key facts about the borough

No main issues.

Our Vision and Ambition

No main issues.

Draft

S1: Presumption in favour of sustainable development

Main Issue	Guildford Borough Council Response
<p>Representations on Specific Issues</p> <p><i>Paragraph 14 of the NPPF:</i></p> <ul style="list-style-type: none"> Concerned by the impact of the policy on the green belt. <p>The way the statement is expressed in policy S1 is a watering down of paragraph 14 of the NPPF. Unconvinced that a separate statement beyond the NPPF is required, however if the Council wish to include the policy it should be as per the wording of the NPPF. At present we do not consider the policy sound by virtue of it not being justified or consistent with the NPPF.</p> <p>No reference to para 14 of NPPF and its footnotes (should be included). Footnote 9 particularly important and should be repeated.</p> <p>Policy does not fit with NPPF 14 which notes that specific policies within the framework may require development to be restricted, and in this context, decision taking should not imply development proposals should be approved in all circumstances.</p> <p>Leaving out footnote 9 misleads the decision make in applying the presumption in favour of sustainable development in cases where it would not apply (e.g. AONB). Policy S1 ignores the requirements of NPPF paragraphs 7, 8, 10 and 17.</p> <p>Should be a reference to paragraph 119 of the NPPF regards presumption does not apply to development being considered</p>	<p>The Policy is based on model wording suggested by national guidance.</p> <p>The NPPF notes that the presumption in favour of sustainable development does not automatically apply to development proposals in the Green Belt. Whilst the NPPF states that Local Plans should not repeat NPPF content, the Council considers that this point could be better emphasised within Policy S1. Text has been added to Policy S1 paragraph 4.1.4 in order to reflect NPPF paragraph 14 (footnote 9), clarifying the restrictive nature of certain policies.</p>

<p>under Birds or Habitats Directive.</p> <p>For the avoidance of doubt, policy should set out specific policies in the NPPF which restrict development e.g. green belt, birds and habitats directive, AONB.</p> <p>References to sustainability are so vague it means Policy S1 is a presumption in favour of any development/ development bias.</p>	
<ul style="list-style-type: none"> • Failure to Define ‘Sustainable Development’. <p>Policy should set out clear framework by providing a definition of “sustainable development” and setting out principles for applying sustainable development in practice to local planning decisions.</p> <p>Plan ignores environmental aspects of sustainability.</p>	<p>Paragraph 4.1.2a has been added to provide a definition of ‘Sustainable Development’.</p> <p>As the definition is provided in the supporting text, applying the appropriate policies in the Plan to planning applications will ensure the principles of Sustainable Development are used in the decision-making process.</p>
<ul style="list-style-type: none"> • Fails to recognise that economic, environmental and social priorities often conflict. Policy does not state how each dimension will be weighted or conflicts resolved. There is not a process set out which addresses how these conflicts will be managed/balanced. 	<p>This is acknowledged in the Sustainability Appraisal. The process of balancing such conflicts is carried out when assessing planning applications in light of the relevant policies within the plan. The plan should be read as a whole. Policy ID1 emphasises how development will be expected to mitigate its impact on infrastructure provision.</p>
<ul style="list-style-type: none"> • The Monitoring Indicators section to Policies S1 and S2 does not acknowledge that all three dimensions to sustainable development need to be applied to have a correct and acceptable monitoring procedure. <p>Monitoring indicators should state that the monitoring report will cover all three aspects of sustainable development (currently just focuses on housing and economic development).</p>	<p>Given the need to consider economic, environmental and social gains, and how these have been balanced, there are not considered to be any appropriate mechanisms for measuring the success of the policy. Whether an application constitutes sustainable development should be central to the determination of planning applications. By their nature, unsustainable development proposals should not be approved. The monitoring will be covered by the monitoring of all other policies within the plan.</p>

S2: Planning for the borough – our spatial development strategy

Main Issue	Guildford Borough Council Response
<i>Representations from Prescribed Bodies and Selected Stakeholders</i>	
<p>Waverley Borough Council</p> <ul style="list-style-type: none"> • Buffer should be used to meet unmet needs. <p>Sites removed from the plan should be reconsidered for their ability to meet unmet need.</p> <p>Recommend that Aaron’s Hill, a cross boundary site, is allocated.</p>	<p>The buffer (approximately 10%) is required to ensure sufficient flexibility to meet our housing target should sites not be delivered as planned. The Council does not consider that unmet needs from within the HMA can be met within Guildford borough. The justification is set out in more detail in the Duty to Cooperate Topic Paper.</p> <p>The sites that have been removed from the plan were removed for planning reasons. This is set out in more detail in the Housing Delivery Topic Paper.</p> <p>Justification for allocating sites and discounting others is set out in the Housing Delivery Topic Paper. Whilst discounted, Aaron’s Hill was tested through the Sustainability Appraisal. We note Waverley is proposing that this site is removed from the Green Belt as one of the major modifications to the Plan.</p>
<p>Woking Borough Council</p> <ul style="list-style-type: none"> • Support buffer which makes significant contribution to housing provision in HMA 	<p>The buffer (approximately 10%) is required to ensure sufficient flexibility to meet our housing target should sites not be delivered as planned. However, we acknowledge that should these sites all be delivered as planned then their delivery would serve to meet identified needs.</p>

<ul style="list-style-type: none"> GBC should meet unmet needs arising from Woking. <p>Woking BC is aware of the information that Guildford Borough Council has provided to demonstrate that the unmet need from Woking cannot be met in Guildford. Once this evidence is agreed at the Examination, Woking BC is willing to cooperate with Guildford and Waverley Borough Councils to find ways of how the unmet need in the Housing Market Area can be addressed. Waverley Borough Council has just been through their Local Plan Examination and the unmet need from Woking was a key topic for discussion. It is recognised that discussions have already started between the three authorities on this particular issue and it is envisaged that this will continue. The three authorities should also monitor housing delivery against their housing requirements to see whether any measures will be necessary to facilitate housing delivery.</p>	<p>The Council does not consider that unmet needs from within the HMA can be met within Guildford borough. The justification is set out in more detail in the Duty to Cooperate and Housing Delivery Topic Papers. We are continuing to cooperate with both Woking and Waverley Borough Councils in relation to meeting housing need across the HMA. Pursuant to this, we have signed a Memorandum of Understanding and Statement of Common Ground which sets out in more detail how we propose to continue cooperating on this matter. Further detail is set out in the Duty to Cooperate Topic Paper.</p>
<p>Hart District Council</p> <ul style="list-style-type: none"> It is noted that a Memorandum of Understanding is to be prepared between the three authorities with the aim that OAHN is met across the HMA. However it is unclear how this will guarantee that every effort is made to address OAHN in full. Hart District Council therefore suggests that some flexibility is needed in the Guildford Plan to address this uncertainty and ensure that OAHN across the HMA is met. This flexibility could be in the form of a Review Clause inserted into the Plan which would be triggered in the event that between them, Woking and Waverley do not address their OAHNs in full. 	<p>The Council does not consider that unmet needs from within the HMA can be met within Guildford borough. The justification is set out in more detail in the Duty to Cooperate and Housing Delivery Topic Papers. The Council's ability to sustainably contribute towards meeting unmet housing needs across the Housing Market Area will be assessed through the Local Plan examination.</p> <p>Once adopted the Council will continue to monitor the effectiveness of our Local Plan. In accordance with the national policy and guidance, the Council will review the relevance of the Local Plan at regular intervals to assess whether some or all of it may need updating.</p>

<p>Runnymede Borough Council</p> <ul style="list-style-type: none"> The source of the total jobs number of 3,200 B class jobs cannot be found. <p>There is inconsistency between the different figures in the policy and Table 1.</p> <p>The total number of housing sites expected to come forward is unclear.</p>	<p>The updated ELNA (2017) identifies the total number of jobs which has been included within Policy E1.</p> <p>The Annual Housing Target table is proposed to be amended as a minor modification to aid clarity (namely show the annual target over the plan period 2015 – 2033) which sums to 12,426 (the total housing requirement). Table 1 has been deleted as the supply that will meet the housing requirement is identified in the Council's latest LAA. This will include a breakdown of completions since 2015, outstanding permissions, windfall and suitable LAA sites. In total this is greater than 12,426 to provide a buffer.</p>
<ul style="list-style-type: none"> Concerned that Guildford is not meeting its full OAN. <p>Uncertainty regarding Runnymede's ability to meet its own OAN and may require assistance under duty to cooperate.</p>	<p>The Proposed Submission Local Plan identifies sufficient sites to meet our OAN, as identified in the West Surrey SHMA: Guildford Addendum Report (2017).</p> <p>The Council does not consider that unmet needs from within the HMA can be met within Guildford borough. Should additional sites come forward, they would be expected to meet needs within Guildford's own HMA, rather than adjoining HMAs. The justification is set out in more detail in the Duty to Cooperate and Housing Delivery Topic Papers.</p>
<p>Elmbridge Borough Council</p> <ul style="list-style-type: none"> Traveller Accommodation Assessment (TAA) is out of date and does not cover the full plan period. <p>The difference between the traveller requirement in S2 and the total proposed supply should be made more clear.</p> <p>If surplus sites are identified then under duty to cooperate Guildford should explore whether it could meet Elmbridge's unmet needs.</p>	<p>An updated TAA has been produced to reflect up-to-date surveys and new legislation. The new TAA covers the period to 2034. The LAA includes a detailed breakdown of the sites proposed to meet the identified traveller need. There is no surplus of identified sites that could be used to meet unmet needs. All the sites identified are required to meet the needs of our settled traveller community with an appropriate buffer to ensure delivery.</p>

<ul style="list-style-type: none"> Sites removed from the plan should be reconsidered for their ability to meet unmet need. 	<p>The sites that have been removed from the plan were removed for planning reasons. Detail justification is provided in the Housing Delivery Topic Paper.</p>
<p>Spelthorne Borough Council</p> <ul style="list-style-type: none"> Request further detail on the options GBC would consider in the event it cannot meet OAN. <p>Should maximise opportunities to meet housing target through increased densities in sustainable locations.</p>	<p>The Proposed Submission Local Plan seeks to meet Guildford borough's OAN. Once adopted, the Council will continue to monitor the effectiveness of the Local Plan. In accordance with the national policy and guidance, the planning policy officers will review the relevance of the Local Plan at regular intervals to assess whether some or all of it may need updating. Policy D4 requires that all developments make the most efficient use of land whilst responding to local character and context.</p>
<p>Surrey Heath Borough Council</p> <ul style="list-style-type: none"> Surrey Heath BC expects to not be able to meet its OAN and will need to explore whether the unmet need could be accommodated within their HMA. If not Surrey Heath BC may need to approach other LPAs with whom they share linkages with, including GBC. <p>Sites removed from the plan should be reconsidered for their ability to meet unmet need.</p> <p>Surrey Heath should be included as a prescribed body in the Duty to Cooperate topic paper with which GBC should engage on housing matters.</p>	<p>The Council does not consider that unmet needs from within the HMA can be met within Guildford borough. Should additional sites come forward, they would be expected to meet needs within Guildford's own HMA, rather than adjoining HMAs. The sites that have been removed from the plan were removed for planning reasons. The justification is set out in more detail in the Duty to Cooperate and Housing Delivery Topic Papers.</p> <p>The Duty to Cooperate matrix in the Topic Paper identifies those LPAs with which Guildford is assessed to have the highest degree of linkages with, as set out in the West Surrey SHMA. It is therefore not definitive and cooperation will clearly need to occur with the wider adjoining HMAs where appropriate.</p>
<p>Wokingham Borough Council</p> <ul style="list-style-type: none"> Plan is not justified or effective as it does not seek to meet Woking's unmet need or explore further potential unmet need arising from Surrey Heath which, whilst in an adjoining HMA, shares relatively strong linkages with the West Surrey HMA. 	<p>The Council does not consider that unmet needs from within the HMA can be met within Guildford borough. Should additional sites come forward, they would be expected to meet needs within Guildford's own HMA, rather than adjoining HMAs. The justification is set out in more detail in the Duty to Cooperate and Housing Delivery Topic Papers.</p>

Representations on Specific Issues	
<p><i>Policy:</i></p> <ul style="list-style-type: none"> Policy S2 should include ‘minimum’ or ‘at least’ in front of the housing requirement in order to help maximise delivery of homes. 	<p>The plan has been amended to include ‘at least’ in front of the housing requirement.</p>
<ul style="list-style-type: none"> The trajectory is below the level required to meet OAN. The sum of the Annual Housing Target table in Policy S2 does not sum to the housing requirement or the figures in the LAA. 	<p>The supply of homes is greater than the housing requirement set out in S2. This is discussed further in the Housing Delivery Topic Paper.</p> <p>The numbers in the table were changed in 2017 to reflect the change in the overall housing requirement. The table identifies the annual housing target from the anticipated date of adoption of the plan (2019/20). As set out in the LAA, for the four years of the plan preceding the date of adoption (2015/16 – 2018/19), the annual housing target represents the annualised OAN figure of 654 homes per year.</p> <p>The wording in paragraph 4.1.9a incorrectly states that the sum of the Annual Housing Target is 12,426. We recommend that a minor amendment is made to the plan in the following way: <u>The Annual Housing Target table be expanded to include the target of 654 homes for the pre-adoption period 2015/16 – 2018/19.</u></p>
<ul style="list-style-type: none"> The phased approach is not justified. Authorities must maintain a rolling five-year housing land supply. The NPPF requires LPAs to boost significantly the supply of housing. Guildford has been persistently under-delivering against OAN and the interim figure of 322. 	<p>The Council considers that there are a number of factors unique to Guildford that justifies a phased approach. The justification for this is set out in more detail in the Housing Delivery Topic Paper.</p>

<ul style="list-style-type: none"> The NPPF advocates a Sedgefield methodology for calculating a 5YHLS. 	<p>Development is contingent upon the delivery of significant infrastructure which is planned for later in the plan period. It is therefore not possible to deliver the level of development early on that is required to meet an annualised target. This is severely exacerbated by the significant level of deficit that continues to be accrued prior to adoption of the Local Plan given Green Belt constraints. These factors mean it is simply not possible to adopt a Sedgefield methodology for calculating a five year housing land supply. This is set out in more detail in the Housing Delivery Topic Paper.</p>
<ul style="list-style-type: none"> The policy should include sufficient flexibility to ensure the housing target is met. 	<p>The annual housing target reflects our overall housing requirement of 12,426 homes over the plan period. The supply of sites identified in the LAA is in excess of this figure (approximately 10%). This buffer ensures sufficient flexibility to ensure that the requirement of 12,426 is met.</p>
<ul style="list-style-type: none"> The policy should include a separate requirement or target for bedspaces / care homes. 	<p>The SHMA addendum has reviewed the projected need for C2 use bedspaces and specialist homes and estimates the need for 1061 specialist homes and 433 C2 nursing home bedspaces over the plan period. Whilst the plan seeks to make provision for this, it is not set as a specific target. Specific sites and mixed-use sites have been allocated within the plan for C2 use/specialist homes to help address this need.</p>
<ul style="list-style-type: none"> The policy should identify safeguarded land which is excluded from the Green Belt now in order to accommodate future growth requirements as part of a review to the Local Plan. 	<p>The Council does not consider that safeguarding of land for future development is appropriate within the Guildford context. The reasons why are set out in more detail in the Green Belt and Countryside Topic Paper.</p>
<ul style="list-style-type: none"> The reduction in the plan period is not justified or consistent with the period identified in the West Surrey SHMA 	<p>The start of the plan period is the year from which the OAN is calculated. The base-date for the OAN is the 2015 mid-year population estimates. The start of the plan period therefore corresponds to that. The end of the plan period is set at a date that would give us a 15 year time period from date of adoption (as recommended by para 157 of the NPPF). This therefore runs to 2034.</p>

<p><i>Housing Need / Target:</i></p> <ul style="list-style-type: none"> There is unmet need within both the housing market area and with councils that GBC share weaker linkages that Guildford should meet 	<p>As established in the NPPF (paragraph 182), the Council does not consider that meeting unmet requirements from neighbouring authorities is reasonable and consistent with achieving sustainable development. Justification for this is set out in the Duty to Cooperate Topic Paper.</p>
<ul style="list-style-type: none"> The housing requirement should be lower due to the application of constraints including Green Belt, flooding, infrastructure, environment and air quality. <p>The Sustainability Appraisal should not include higher growth options.</p> <p>The housing requirement is significantly higher than other councils.</p> <p>Building additional homes will not reduce demand.</p> <p>The proposed buffer is too high.</p>	<p>The NPPF requires that we meet the full, objectively assessed needs (OAN) as far as is consistent with the NPPF. We consider that we can meet the OAN identified for Guildford borough.</p> <p>Given the NPPF requirement to meet needs however, the impacts of providing for additional sites in order to meet unmet needs has been tested. However, this is considered not sustainable.</p> <p>The housing requirements of many neighbouring authorities are still based upon previous South East Plan figures. This is no longer an appropriate basis for planning for new homes.</p> <p>The NPPF requires that an uplift is considered where the market signals and affordable housing need indicate it is justified to do so.</p> <p>The buffer in housing supply is necessary to ensure that the housing requirement can be met. Further comment is provided in the Housing Delivery Topic Paper.</p>

<p><i>OAN too high:</i></p> <ul style="list-style-type: none"> Lack of transparency, model is not available. <p>Figures have not been scrutinised.</p> <p>Independent reviews of the SHMA prepared by Neil McDonald (NMSS) and David Reeve.</p>	<p>The SHMA has been prepared in accordance with the NPPF and NPPG. This states that the ONS population and CLG household projections form the starting point and based on nationally consistent assumptions. These figures and the assumptions underlying them are all publicly available.</p> <p>The SHMA has examined demographics in the Borough and wider HMA, including migration, UPC and household formation.</p> <p>The methodology detailing how the uplifts have been calculated are set out in the SHMA with data clearly sourced.</p> <p>The Council's OAN consultants have considered issues raised by representors in the development of the evidence base.</p> <p>The SHMA has undergone significant scrutiny from early on its preparation. This included a review by Edge Analytics, commissioned by GBC. The Council has reviewed the evidence submitted and consider that our evidence remains robust.</p>
<ul style="list-style-type: none"> The OAN should be reduced further still in response to: <ul style="list-style-type: none"> Brexit and reduced net migration, longer term population trends, underestimate of students who migrate out of Guildford, UPC adjustment which indicates an overestimation of population growth, should not include demand from London or Woking, OAN is assessed to be higher than population projections, independent review of the SHMA prepared by Neil MMSS. 	<p>The SHMA has been prepared in accordance with the NPPG. This states that the ONS population and CLG household projections form the starting point. These figures and the assumptions underlying them are all publicly available. The SHMA has examined demographic dynamics in the Borough.</p> <p>The methodology detailing how the uplifts have been calculated are set out in the SHMA with data clearly sourced.</p> <p>The SHMA has undergone significant scrutiny from early on its preparation. This included a review by Edge Analytics, commissioned by GBC. The Council has reviewed the representations submitted, which include representations arguing for both higher and lower OAN figures and consider that our evidence remains robust and the OAN is appropriate to the housing need in Guildford.</p>

- Identified OAN and housing requirement is not high enough. It should be increased further to take account of the impact of London migration, market signals and affordable housing need.

The SHMA has been prepared in accordance with the NPPG. It deals with housing need over the plan period. This states that the ONS population and CLG household projections form the starting point. The Addendum evidence takes account of the latest Mid-Year Population Estimates. The latest household projections point to lower growth across the Housing Market Area.

Market signals, which includes historical housing delivery, have been considered in drawing conclusions on the OAN as has the inter-relationship between Guildford and London. Brexit uncertainties do not provide a clear basis for adjusting the OAN, but inevitably this will need to be kept under review. The uplifts included within the evidence are appropriate to Guildford.

These figures and the assumptions underlying the OAN evidence are all publicly available. The methodology detailing how the uplifts have been calculated are set out in the SHMA with data clearly sourced.

The latest economic forecasts show lower employment growth across the Housing Market Area.

The SHMA has undergone significant scrutiny from early on its preparation. This included a review by Edge Analytics, commissioned by Guildford Borough Council. The Council has reviewed the evidence submitted and consider that our evidence remains robust.

<ul style="list-style-type: none"> • The reduction in OAN/housing target is not justified given: <ul style="list-style-type: none"> • previous shortfall in housing delivery, • evidence on market signals, • the PPG indicates that adjustments to household formation rates and for market signals are separate stages in the calculation (headship rates in ID 2a-015 and market signals in ID 2a- 02o). Modelling household formation as a precise response for market signals doesn't seek to consider what impact it has on improving affordability. Market signals/affordability affects other age groups, and the PPG is clear that the purpose of a market signals uplift is to provide more than the household projections. This matter was explored in the Waverley examination. • evidence of affordable housing need which has increased, • adjustment for London migration, • uncertainties regarding Brexit, • failure to assess whether lower job growth in Guildford might be balanced by increased job growth elsewhere in the HMA, • unmet needs, • unjustified decrease in employment forecasts, • 2014 population projections point to higher growth than previous projections, • Latest mid-year population estimates indicate a higher growth than that contained in projections, • projections show greatest increase in short term whilst the plan backloads delivery. 	<p>The SHMA has been prepared in accordance with the NPPG. It deals with housing need over the plan period. This states that the ONS population and CLG household projections form the starting point. The Addendum evidence takes account of the latest Mid-Year Population Estimates. The latest household projections point to lower growth across the Housing Market Area.</p> <p>Market signals, which includes historical housing delivery, have been considered in drawing conclusions on the OAN as has the inter-relationship between Guildford and London. Brexit uncertainties do not provide a clear basis for adjusting the OAN, but inevitably this will need to be kept under review. The uplifts included within the evidence are appropriate to Guildford.</p> <p>These figures and the assumptions underlying the OAN evidence are all publicly available. The methodology detailing how the uplifts have been calculated are set out in the SHMA with data clearly sourced.</p> <p>The latest economic forecasts show lower employment growth across the Housing Market Area.</p> <p>The SHMA has undergone significant scrutiny from early on its preparation. This included a review by Edge Analytics, commissioned by Guildford Borough Council. The Council has reviewed the evidence submitted and consider that our evidence remains robust.</p>
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<p><i>Spatial Strategy:</i></p> <ul style="list-style-type: none"> • Strategy should include a greater number of smaller sites as larger sites are slower in delivering homes due to the longer lead in times This would enable the Council to deliver more housing within the first 5 years. 	<p>The rationale for the proposed spatial strategy is set out in more detail in the Housing Delivery Topic Paper. Whilst strategic sites have longer lead-in times, they are also able to provide for a greater level of associated infrastructure. Whilst the Council have sought to maximise the number of smaller greenfield sites that can deliver within the first five years, it is not possible to sustainably accommodate the level of growth required to maintain a rolling five-year housing supply using an annualised housing target.</p>
<ul style="list-style-type: none"> • The Sustainability Appraisal (SA) has not tested any reasonable alternative that do not meet OAN. This is contrary to national policy that allows constraints to be applied. 	<p>The SA 2017 (paragraph 6.5.4) sets out in more detail why this is not considered a reasonable alternative.</p>
<ul style="list-style-type: none"> • Housing has been disproportionately concentrated across the borough, particularly along the A3. <p>The level of growth proposed results in an expansion by a quarter.</p> <p>Plan does not allocate sustainable sites.</p>	<p>The spatial strategy and site allocations have been guided by the spatial hierarchy, which seeks to direct homes to sustainable locations. The spatial strategy has also been tested through the Sustainability Appraisal process. The distribution responds to the constraints of AONB in the south and the SPA to the north. The rationale for our spatial strategy and site allocations is set out in more detail in the Housing Delivery Topic Paper.</p>
<ul style="list-style-type: none"> • Should not rule out sites on the basis of their Green Belt sensitivity as many of the potential development areas around the villages are small and their allocation would not harm the Green Belt function of the wider land parcel within which it sits. Sites should be allocated on the basis of sustainability not just Green Belt sensitivity 	<p>Green Belt sensitivity was one of a number of factors used in determining our spatial strategy. The way in which the Green Belt sensitivity was used to inform site allocations is set out in more detail in the Housing Delivery Topic Paper.</p>

<ul style="list-style-type: none"> The plan has not included enough of the sites identified in the Town Centre Masterplan. The plan should reference the intention and aims of the Town Centre Area Action Plan (TCAAP). 	<p>The Local Plan includes sites that are deliverable over the plan period whereas the Guildford Town Centre and Hinterland Masterplan Report (Final draft report for consultation, October 2015) looked over a longer time period and was more aspirational. The draft masterplan is neither a Development Plan Document nor a Supplementary Planning Document. The document has limited, if any, weight as a material consideration in planning terms. The draft masterplan was used to inform the Guildford Town Centre Regeneration Strategy 2017 which was approved in January 2017 by the Council's Executive. This identifies a number of sites that the Council, through the Major Projects team, will seek to progress. Where appropriate these could be brought forward through the planning application process and would contribute towards our supply. Like the draft masterplan, the Guildford Town Centre Regeneration Strategy 2017 has limited, if any, weight as a material consideration in planning terms.</p> <p>The opportunity to prepare a TCAAP remains a possibility should it be considered appropriate and necessary at that time.</p>
<ul style="list-style-type: none"> The plan should include more brownfield sites within sustainable locations such as the town centre rather than Green Belt and greenfield sites. 	<p>Brownfield opportunities within the town centre and urban areas are at the top of our spatial hierarchy. We have maximised all sustainable sites within these areas prior to considering greenfield and Green Belt options. This process used to identify sites is set out in more detail in the Housing Delivery Topic Paper.</p>
<p><i>Employment:</i></p> <ul style="list-style-type: none"> The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by AECOM who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that "there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented ." 	<p>Pipeline consents need to be considered as part of future supply of industrial floorspace. As with all permission, a proportion will, for a variety of reasons, not be developed. It is therefore appropriate and robust to build in a factor for undelivered permissions.</p>

<p>Slyfield and Guildford still have empty sites and industrial units. 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.</p> <p>ELNA states "planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space." 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.</p>	
<p><i>Adverse Impacts:</i></p> <ul style="list-style-type: none"> Proposed growth will lead to unacceptable effect on air quality. Air quality is already an issue within the borough. 	<p>An Air Quality Review has since been produced, which has assessed the impact of proposed growth on air quality. This advises further detailed modelling in certain areas, but concludes that air quality issues are not incompatible with the growth proposed in the Local Plan.</p>
<ul style="list-style-type: none"> Permanent detrimental impact on the character of area and setting of the town 	<p>The Local Plan includes design policies. The Council has a Design and Conservation team that will help shape the masterplanning process to ensure all new development is designed to be of high quality.</p>

<p>Infrastructure:</p> <ul style="list-style-type: none"> Inadequate infrastructure improvements. <p>Infrastructure proposals are unfunded proposals.</p> <p>Existing deficiencies in infrastructure.</p> <p>Road network over capacity, particularly the A3.</p>	<p>Appendix C of the Local Plan identifies the infrastructure that is necessary to deliver the planned growth. Policy ID1 requires that the necessary infrastructure is provided and available when first needed. This issue is discussed in more detail in the ID1 section.</p>
<ul style="list-style-type: none"> The housing proposed is not deliverable due to constraints and infrastructure requirements 	<p>One of the tests of soundness identified in the NPPF (paragraph 182) is that the plan is effective (and therefore deliverable over the plan period). The sites identified meet the tests contained within paragraph 47 of the NPPF. Appendix C sets out the key infrastructure requirements on which delivery of the plan depends. We consider there is sufficient certainty that this infrastructure can be delivered over the plan period.</p>
<p>Omission Sites</p>	
<p>Clandon Golf Site (LAA site 2184)</p>	<p>The evidence base and Sustainability Appraisal process have informed the spatial strategy. The justification for the spatial strategy is set out in more detail in the Housing Delivery Topic Paper.</p>
<p>Land at Vaglefield Farm and Strawberry Farm, Glaziers Lane, Normandy (LAA site 2315)</p>	
<p>Land at Orestan Lane, Effingham (LAA site 1201)</p>	
<p>Land south of New Pond Road, Farncombe (LAA site 2241)</p>	
<p>Ewbanks, Send (employment) (LAA site 392)</p>	
<p>Land at Polesden Lane and Send Marsh Road, Send Marsh (LAA site 1221)</p>	
<p>Land at Aldertons Farm (LAA site 27, 28, 29)</p>	
<p>Former Highland Nurseries, Portsmouth Road, Ripley (LAA site 157)</p>	
<p>Land Adjacent to Mount Brown, Artington (LAA site 2359)</p>	
<p>Land west and south west of Fairlands (LAA site 2014)</p>	
<p>Land adjacent to Artington Park and Ride (LAA site 2358)</p>	
<p>The paddock adjacent to Sheiling (LAA site 2357)</p>	
<p>Land south of A246, west of Shere Road, West Horsley (LAA site 2175)</p>	

Liddington Hall (LAA site 78)
Rokers, Fairlands (LAA site 1410)
Hornhatch Farm, Chilworth (LAA site 2032)
Land north of Effingham, west of Effingham Common Road (LAA site 1408)
Land south of Tongham – GBCS land parcel K3 (LAA site 2091)
Land west of Westwood Lane, Flexford and north of railway line (LAA site 2356)
PDA's identified in GBCS at Wood Street Village (LAA site 1416, 2012)
Land at Westwood Lane and Beech Lane, Flexford (LAA site 2008)
Land at Tangle Mere (LAA site 2303)
Lyons Field, Effingham Common Road (LAA site 2296)
Land at Crickets Hill Farm, Normandy (LAA site 2071) – 2 parcels
Land to the North of Gravetts Lane (LAA site 162)
Land east of Glaziers Lane and to the immediate north of Flexford (LAA site 2010)
Site at Potters Lane (LAA 1033)
Land east of Chinthurst Lane, Shalford (LAA site 2034)
Nutbourne Fruit Farm (LAA site 279)
Landfill on A281 south of Shalford (LAA site 168)
Wellington House (Site 2307)
Further land to the north site allocation A22 Keens Lane (LAA site 49)
GBCS land parcel J3 and beyond (LAA site 2311)
Land east of Ash and Tongham between Harper's Road and Wyke Lane, Ash (LAA site 2335)
Land north of Tannery Lane, Send (LAA site 72)
North of Slyfield (employment) (LAA site 156)
land south of Normandy and north of Flexford (LAA site 368)
Land to the east of The Paddocks, Flexford (LAA site 2011)
Bridge Cottage and Land behind Ripley Lane, West Horsley should be considered a strategic site (LAA site 24)
Georgelands, Ripley (LAA site 190)

Liddington Hall (LAA site 78)	
Land adjacent Peasmarsh industrial estate (LAA site 2350)	
Land at Fonthill, Godalming (LAA site 2367)	
Land adjacent to Mount Brown, Artington (LAA site 2359)	
Land Opposite Arlington Park and Ride (LAA site 2358)	
Site between Ripley Lane and Silkmore Lane, West Horsley (LAA site 139)	
Dunmore Farm, south of Fairlands (LAA site 2190)	
Howard of Effingham and Lodge Farm (LAA site 2029)	
Tangley Place Farm, Worplesdon (LAA site 2311)	
Land north of Poyle Road (LAA site 79)	
Broadford Business Park, Shalford (LAA site 2186)	
Land off Heath Drive, Send (LAA site 52)	
Thatcher's Hotel (LAA site 2044)	
Former Walnut Tree Park and adjacent Nissan car showroom sites (LAA site 2227 and 2228)	
Aaron's Hill, Godalming (LAA site 2254)	
Land at Clandon Regis Golf Club (LAA site 2368)	
Land at Foxburrow Hill Road, Guildford (LAA site 150)	
Foxbury (LAA site 2116)	
Land at Hester's Yard, Wood Street Village (LAA site 35)	
Land at Hook and Hunts Farm, Fairlands (LAA site 2072)	
Land at Barcombe Farm and west of Cranmore Lane (LAA site 26 and 325)	

H1: Homes for all

Main Issue	Guildford Borough Council response
<p>Representations from Prescribed Bodies and Selected Stakeholders</p>	
<p>University of Surrey</p> <ul style="list-style-type: none"> The University strongly objects to the elements within Policy H1, which require that 60% of FTE students be accommodated on campus. The University already provides more accommodation than do 95% of Universities across the nation, it plans to deliver 1,150 new units over the next three years and it expects to deliver more in the future as funds/circumstances permit to support new demand. The PBSA sector in Guildford, on the other hand, is virtually non-existent (c160 units at date). The clause is regarded as divisive, discriminatory, impractical and dangerous. <p>Investments by the University in student accommodation over the past ten years are approaching £130m (including £85m in new accommodation); a further sum of around £75m is due to be spent delivering 1,150 new units over the next three years and further accommodation will be built to support new demand as funds permit.</p> <p>The University strongly objects to the specific wording regarding student housing which it regards as being discriminatory and the expectation that 60 per cent of the University’s eligible student population should be provided with student bedspaces and accommodation on campus. The “eligible student population” is not the same as the “full time equivalent” student population.</p>	<p>The policy wording of H1 has been significantly reviewed. The word ‘eligible’ has been deleted. The expectation that the University of Surrey will meet 60% of its students’ accommodation needs is considered reasonable. The expectation originates from the last 2003 Local Plan, where the Inspector stated (paragraph 16.2.4) that the Manor Park site was removed from the Green Belt as there will be a need to increase student residential accommodation, with the aim of returning the proportion resident to about 60%. The University has by far the greatest number of students requiring accommodation and bearing in mind the extant planning permissions at Manor Park campus and historical precedent, this approach is considered reasonable. Evidence from students’ consultation, and the Student Union’s publication ‘Living at the Limit – Guildford Student Housing Crisis’ demonstrates that students struggle to find accommodation, and that the cost of private rented accommodation is on average higher than on-campus accommodation.</p> <p>This is included in the approach within the policy in order to make clear the expectations about student accommodation. The expectation is that 60% of all students, not just future student growth, should be accommodated on campus; this reflects the historical approach taken as set out above. Implementing the extant planning permission at Manor Park will help to achieve this.</p> <p>Where suitable sites exist in sustainable locations the priority is the provision of C3 housing rather than purpose built student housing (sui generis use). C3 housing is more flexible, meets general housing needs and does not preclude the occupation by students.</p>

There are about 7,100 student bedspaces that are either already built and in use (5,100) or committed through planning permissions (about another 2,000, depending on detailed planning).

About 48% of full time Guildford-based students currently in University-owned accommodation.

The wording in the policy reads as an aspirational statement without any context regarding how this could practicably be achieved, assessed or monitored. This aspiration is discriminatory against the University and against students. University students have the same rights as any other member of the public and the University cannot compel them to live in its accommodation. Similarly, the University cannot reasonably be expected to build on campus accommodation beyond the actual demand. The University believes and evidence suggests that the real demand for on campus accommodation lies between 50% and 55% of full time Guildford-based students after which increased vacancy rates will have severe implications for the financial sustainability of the University.

It would be inconsistent to place such a requirement on the University and not on other higher education providers in the borough, none of whom currently provide accommodation for their students.

The University considers that 60% of the growth in the full time student population (i.e. not the total, but additional students arriving from the base date of the local plan) is a more realistic target.

The following might also usefully be added to paragraph 4.2.18 as further context: "The University of Surrey has outline planning permission for increases in academic

The Proposed Submission Local Plan proposes further purpose-built student accommodation at the University of Law (112 bedspaces) and Guildford College (200 bedspaces).

<p>floorspace and student accommodation that it expects to build within the plan period. It does not anticipate at this stage any further significant space needs in the plan period beyond those for which it already has outline planning permission.” This would make it clear that the University’s needs are provided for already by the outline permission granted for Manor Park in 2004, and still extant.</p>	
<ul style="list-style-type: none"> The policy wording regarding 'About 60%...expected to be provided with accommodation' is not sound, and should be deleted. The policy should not give the impression that there is an obligation, requirement or expectation on the University to provide a particular level of accommodation on campus. The University does, and will, provide accommodation on campus according to the availability of land on its estate and the ability to finance such development. Local plan policy should enable it to do so without implying a specific level to be achieved. <p>The University objects to the changed text that states: "However, we will resist purpose built student accommodation on sites allocated for C2 or C3 use class housing." The provision of student accommodation on sustainable sites close to the University will help to reduce pressure on general market housing in Guildford. If allocated sites have not already come forward for the C2 or C3 use, then it would be appropriate for them to be used for student accommodation.</p>	<p>Setting out the Council’s expectation about the amount of student accommodation it expects on campus is considered an acceptable approach. The University needs to take a responsible approach to future growth in student numbers and ensure it plays its part in accommodating both existing and potential future students. The Council knows, from the feedback received though the consultation, the impact that lack of student accommodation can have on the housing market, residents and students.</p> <p>The Council's priority is the provision of C3 housing rather than purpose built student housing (sui generis use) in suitable and sustainable locations. C3 housing is more flexible and meets general housing needs and does not preclude the occupation by students.</p>

University of Surrey student responses (*Collated by Students' Union Survey*):

600 students were asked if they wanted to comment on the Local Plan, the Student Union has submitted their responses and the main key issues are summarised below:

- Upgrade transport system and frequency. Restructure roads to reduce congestion and be cycle friendly.

There aren't enough houses available in Guildford, and the prices are totally unaffordable.

Create affordable, reasonable quality housing so that being a student living in Guildford is a viable option

The University have made more accommodation for the first years but have not thought of the impact this would cause 2 or 3 years down the line when all those extra students need to be housed in the local area. There is little supply and lots of demand for housing and students are struggling to find a house.

More student accommodation owned by the university needs to be built rather than private sector housing, so affordable accommodation can be maintained and kept habitable by the University.

I think that cheaper, private halls would be the best solution at the moment.

Housing needs to be increased as the University have received a record amount of UCAS applications, and third years/masters students/international students wanting campus accommodation are unlikely to get it.

The Proposed Submission Local Plan will address many of the issues raised by the University of Surrey students, such as additional and affordable housing and transport issues.

The need for more housing is recognised, and the SHMA includes an uplift to take account of the increase in students requiring accommodation off campus. The wording of Policy H1 has been amended to encourage purpose-built student accommodation on campus where appropriate. Further student campus accommodation can, and is, being built on the Manor Park campus through the extant outline planning permission.

The Council cannot control the rent levels or deposits, which are set by individual landlords.

Transport issues are addressed in Policy ID3.

Representations on Specific Issues	
<p><i>Homes for all:</i></p> <ul style="list-style-type: none"> • What local families need is a supply of decent homes within reach of the town's facilities without the need of transport, not an urban sprawl with gridlocked roads. Guildford Borough principally needs smaller and more affordable houses, homes for first time buyers and homes for older people to free up larger family homes. The Borough does not need more large mansions for wealthy migrants to the area. 	<p>The aim of Policy H1 is to get the right mix of housing types and sizes, not constrain building. The Policy should be read alongside other policies in the plan, which include protection and design. The SHMA Addendum (2017) provides updates since Brexit and gives a breakdown of sized properties needed in the borough (paragraph 4.2.3). A detailed response to the comments on the SHMA are set out in the Council's response to Question 1 and Appendix D Evidence Base. Affordable Housing is addressed in Policy H2.</p>
<p><i>Density:</i></p> <ul style="list-style-type: none"> • To ensure that the most productive use of land the Council should set a minimum baseline density per hectare and include a density figure, or range, for new housing within the urban areas. Support higher density development in the urban area, close to transport hubs to facilitate modal shift, without resorting to high-rise buildings. Much of Guildford town could be regenerated with 4-5 storey blocks with landscaping and underground parking. The policy should set rules on constraints and density and does not provide a practical framework for planning decisions. Higher densities on Green Belt sites would be out of character with existing housing styles and layout, and unsustainable in terms of drainage, road capacity, schools, shops, parking and public transport. Strongly welcome this approach with an overall presumption and decisions taken on what is appropriate on a case-by-case basis. Previous targets were too blunt to be useful having no relevance where higher densities could be achieved and driving harmful schemes and avoidable appeals in those instances where a lower density was appropriate. 	<p>The policy approach to density has been moved to Policy D4 on Character and design of new development. The focus of Policy H1 is on the types and mix of accommodation. Policy D4 (g) promotes local distinctiveness to create a sense of place with innovative architecture. Each application is looked at on its own merits and it is not considered appropriate to apply a blanket approach towards density.</p> <p>Policy H1 should be read alongside other policies in the plan, which include protection and design policies. The policy requires new development to deliver a wide choice of homes to meet a range of accommodation needs as set out in the latest SHMA and to provide a mix of tenures, types and sizes appropriate to the site size, characteristics and location.</p>

<p><i>Density:</i></p> <ul style="list-style-type: none"> Concern that the section on density has been removed and a reduced statement placed in Policy D4. The point that higher density development will be supported in the town centre has been lost, as has the explanation in 4.2.8. The clear policy direction has not been replicated in Policy D4. <p>The Policy wording should be adapted to include reference to a minimum baseline density of 30 dph.</p> <p>This omission avoids the requirement for local authorities in paragraph 47 to 'set out their own approach to housing density to reflect local circumstances'.</p>	<p>The emphasis of Policy H1 is on housing tenures, types and sizes. The policy approach to density has now been included in Policy D4 Character and Design of Development. Density will be considered on a case-by-case basis and Policy D4 states that all development must ensure appropriate density to make the most efficient use of the land whilst responding to local character and context, which would mean higher densities on Town Centre sites.</p>
<p><i>Accessible Homes:</i></p> <ul style="list-style-type: none"> The Council have not provided the necessary evidence to support the implementation of optional building regulations M4 (2) and M4 (3) (b). Evidence on need and viability is required to justify the implementation of these optional standards. 	<p>The SHMA Addendum (2017) provides the necessary evidence on need and an update to the Local Plan and CIL Viability Study provides evidence of the impact on viability in respect of accessible homes.</p>
<p><i>Specialist accommodation/Ageing population:</i></p> <ul style="list-style-type: none"> The policy should be amended to proactively plan and make appropriate provision covering the broad spectrum of needs for older housing and include allocated sites for accommodation for specialist uses. <p>The provision of accommodation for the frail and elderly is loosely wrapped up as part of a recognised need for 'Specialist Housing' including housing for; homeless people, people with health issues. This policy approach is far too broad and does not reflect the growing trend for flexible residential communities for older people that can meet their transitioning needs over time without requiring them to move home or from a wider community/village.</p>	<p>Policy H1 requires new development to deliver a wide choice of homes to meet a range of accommodation needs as set out in the SHMA, which provides flexibility within the policy over the plan period if the SHMA is updated. Policy H1 (paragraph 4.2.3) highlights the SHMA addendum findings, particularly the specialist homes and registered bedspaces needed over the plan period. Whilst the plan seeks to make provision for this, it is not set as a specific target.</p> <p>Specific sites have been allocated within the Proposed Submission Local Plan for C2 care home uses and specialist accommodation; within the larger sites specific reference is made to the provision of specialist housing. Policy H1 (paragraph 4.2.15) clarifies that specialist accommodation includes homes for those in later life, such</p>

Paragraph 4.2.7 is confusing and contradictory in terms of monitoring especially student accommodation and Use Class C2 residential institutions for older people. The Policy separates C3 use from C2 residential institutions and it makes sense to monitor these targets separately to ensure a suitable mix of housing is delivered over the plan period. However, paragraph 4.2.7 appears to allow the Council to count student accommodation and C2 use, which they state (and the SHMA identifies) as separate requirements, towards their general overall C3 housing requirement.

Older person's specialist housing (including care homes) are listed as a separate indicator to be monitored, however there is no specific target within Policy H1 (or indeed Policy S2) to monitor against. It is inappropriate to refer the mix within the 'latest SHMA' as this does not provide clarity and is ineffective.

With reference to current provision, SHOP data shows that at present there are only 164 extra care units provided within the District, and 548 nursing care beds. The future need for extra care will continue to result in an under supply, whilst for nursing care following 2020 there will also be a deficit. The future population growth of older people must be planned for.

Future proofing some houses for independent living for elderly should be built into new builds at the planning stage. The introduction of technology to new homes such as telecare / medicine would also help future proof homes for older people so that they may maintain independent living.

as extra care housing and specialist housing.

The reasoned justification has been updated to include telecare/telemedicine. New policy wording has been added to require a percentage of new homes to be built to Building Regulations Standards for adaptable and accessible dwellings or wheelchair user accessible dwellings, which will help meet accommodation needs and provide a choice of accommodation.

The reasoned justification wording on how to count student and C2 bedspaces is based on guidance within Government Planning Practice Guidance. Monitoring indicators will monitor how many C2 or student bedspaces are provided assessed against the projected need in the SHMA.

Student accommodation:

- Student accommodation should be provided for 85 - 100% of new students and more than 60% of existing students, which would free up family accommodation in the urban area. They already have the land and permissions to do this, which would allow 1000 houses to be released from HMO occupancy. Other university cities (e.g. Oxford) insist on higher percentages.

The University's expansion should be in line with what it can deliver in terms of extra student accommodation.

Surrey University has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its surface car parks). If all students are accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog's Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

The University of Surrey should provide all accommodation with planning permission before considering any more development proposals from the University. GBC should refuse future planning permission until past permissions are fulfilled.

There are 14,000 students with only 5,500 campus accommodation places. There are at least 1,500 HMO's in Guildford occupied by students.

The wording of Policy H1, and the reasoned justification, has been updated in relation to student accommodation to encourage purpose-built student accommodation on campuses where appropriate. About 60% of full time University of Surrey Guildford-based students are expected to be provided with accommodation on campus. Insisting on 100% of students being accommodated on campus is not something local planning authorities have the power to introduce or enforce – students are free to choose to live where they wish.

Our expectation that the University of Surrey will meet 60% of its students accommodation needs originates from the last 2003 Local Plan, where the Inspector stated (paragraph 16.2.4) that Manor Park site was removed from the Green Belt as there will be a need to increase student residential accommodation, with the aim of returning the proportion resident to about 60%. The University has by far the greatest number of students requiring accommodation and bearing in mind the extant planning permissions at the Manor Park campus and historical precedent, this approach is considered reasonable.

Each application must be determined on its own merits and a blanket refusal of planning applications from the University of Surrey without good planning reasons would constitute unreasonable behaviour.

The Proposed Submission Local Plan proposes further purpose-built student accommodation at the University of Law (112 bedspaces) and Guildford College (200 bedspaces). Student accommodation need has been reviewed and updated in the SHMA addendum 2017. For students living within market housing, future need is calculated to be 23 homes per year over the plan period.

The University has extant outline planning permission for increases in academic floorspace and student accommodation on the Manor Park campus and it continues to submit detailed planning applications in accordance with the original outline planning permission and to build this. The Council cannot make a developer build out their planning permission. The University's representative has said that: "It does not anticipate at this stage any further significant space needs in the plan

This policy is misguided in that expecting one place of education (University of Surrey) to provide 60% of its own accommodation while failing to require a similar proportion for the other degree level education establishments in the town. No one can be 'forced' to live anywhere. Even if 100% of accommodation were provided on campus there will always be students who do not wish to live there! All education establishments should provide affordable accommodation for all non-local students such that during their educational period they do not automatically by default 'absorb' local housing stock.

In 2002, when the University was pushing to take Manor Farm out of green belt, it argued that students wanted to live in student halls and that not having enough on-campus accommodation meant that it was losing students to Kingston. It also stated "The provision of on-campus accommodation for over 60% of students is a benefit of very substantial significance. On-campus accommodation is cheaper than renting in the private sector and students are closer to the University's facilities. Other benefits include a subsequent reduction in housing demand in Guildford, further enhanced by the release of University land at Hazel Farm for general housing provision." – Uni of S, Manor Park Non-Technical Summary (para 19/20), November 2002. Pressure for housing in the town suits the University's case to develop its land holding on the green belt.

In the 2003 Local Plan the university was granted special permission to build student and staff housing on land at Manor Farm by taking it out of the Green Belt so that the university could keep a promise to build 4,790 residences to cope with its growing student population. These were considered exceptional circumstances and this planning permission was given for development on Green Belt land.

period beyond those for which it already has outline planning permission." The University's needs are provided for already by the outline permission granted for Manor Park in 2004, and still extant.' There are currently no planning applications to develop the University's car parks.

Green Belt land (including the Blackwell Farm site) is to be released to meet Guildford's overall housing needs for general market housing and not specifically the accommodation needs of students.

Government guidance that student accommodation can be counted towards calculating local housing need has been taken into account (see Housing Topic Paper, paragraph 4.36). As a separate need for on-campus student accommodation has been identified, only those units provided over and above the projected need will be counted as contributing toward the general market requirement as this releases accommodation into the general housing market.

They have only built 1,665 units and we are still waiting for the other 3,125. Student growth accounts for 50% of the recent growth of the population of Guildford Borough.

Fails to compel University of Surrey to use its planning permissions and existing space for student accommodation. Let's University off the hook of accommodating all its students, so as to free up houses for the most needy in town.

Every university has a basic duty to provide as much accommodation for its students as possible. Surrey University already has planning permission for a thousand or more housing units for student accommodation and has other land in its campus, which could be used to house its students. This would release thousands of housing units in the town for ordinary residents.

By not building the student units on Manor Farm, the University is creating its own housing demand and this is reflecting on the Local Plan's housing "need" numbers in the borough as it is being artificially raised.

Over 7,500 university students are estimated to live in private rented homes within the town. This is likely to increase with the opening of a medical, veterinary and business school. This represents a large number of more affordable homes that could potentially be made available to the wider community if the university had more accommodation.

Student accommodation:

- The SHMA underestimates the impact student growth will have on the housing market and does not estimate the future growth of any other local institutions. Without a buffer within the OAN to include all institutional growth, the conclusions of the SHMA on student growth and impact on local housing market may be underestimated.

The SHMA states that the "proportion of the total students which is full-time Guildford-based could be expected to fall from the current level of around 70%, for instance as a result of growth in degree apprenticeships and foundation students" and there is no justification to support this statement. The SHMA continues to state that "the number of full-time Guildford-based students is expected to increase from 10,700 (2015/16) to around 14,500 over the next ten years (to 2026/27)". This is only 63% of the overall anticipated head count of 23,000 students in 2026/27 academic year. There is no justification for this 7% decrease in full-time Guildford based students so there is potential that student growth and impact on local housing market are underestimated.

Using the current levels of 70% of full-time students to be Guildford based (16,100 full-time Guildford based students) and an uplift of 5,400 students by 2026/27 would equate to 2,430 students expected to live within the general housing stock (45%). This would be 608 dwellings over the 17-year Plan period, an average of 36 dwellings per annum. This is an additional 12 dwellings per annum against the Borough's overall housing need.

The SHMA fails to take into account the impact of student growth on the local housing market in the last 7 years of the Plan-period, and could be underestimated within the OAN.

There is no requirement to set a target for student accommodation. However, the potential impact that the future growth plans of the University of Surrey are likely to have on the local housing market has been taken into account in the final housing figure.

The SHMA has considered the need for purpose built student accommodation bedspaces and the demand for market accommodation from Guildford-based full time University of Surrey students. The SHMA was informed by interviews with University staff and based on up to date data and trends in student numbers, and is considered to be a sound and well-reasoned approach. The University has an aspirational growth target but expects that the total of full time Guildford based students could be expected to fall from the current levels of 70%. The other further and higher educational establishments within Guildford have significantly less students requiring accommodation within Guildford and are anticipated to have a very modest impact on the local housing market should they increase their student numbers.

The extant outline planning permission on the Manor Park campus, plus the allocated sites at the Law College and Guildford College will help meet the demand for purpose built student accommodation from Guildford-based students attending various higher education establishments. This approach reflects PPG Paragraph 21 that "Encouraging more dedicated student accommodation may provide low cost housing that takes pressure off the private rented sector and increase in overall housing stock." The University continues to submit detailed planning applications and build student accommodation on its Manor Park campus.

Details of our approach towards student housing are set out in more detail in the Housing type, tenure and mix Topic Paper. Available data has been used to make reasonable assumptions about the future need for student accommodation. The revised Policy wording sets out the Council's expectations on the amount of student accommodation it

The word 'about' weakens this sentence and makes it less likely that 60% of eligible students will be provided with accommodation on campus.

In 2003, the University of Surrey committed to housing 60% of its students on its two campuses. Only 36.8% of its students are currently in purpose-built student accommodation (PBSA), and there is future provision for a total of 44% of students to live in PBSA. As 141 PBSA bed spaces are provided by a privately-operated company (Scape), the University has clearly fallen well below its 2003 commitment.

Data in the Frank Knight report shows that Guildford has "both a low existing and pipeline bed space count compared to its student population" The report concludes that, "the market in Guildford for student accommodation is currently structurally undersupplied. The consented pipeline of proposed developments will do little to re-address the lack of student accommodation."

expects to be provided on campus.

Travellers:

- It is unclear where the suggested limit of 9 pitches/plots or less comes from. That seems a bit prescriptive. Gov policy (no longer saved) suggested 15 pitches or less was an ideal limit. Two site allocations are for sites with more than 9 plots/pitches. This is a matter best left to site specific issues.

It is not accepted that the immediate need to 2017 is met. Policy as submitted will deliver only 37 new pitches 2012-2017 if the plan is adopted, not 43. The policy is not sound and legally compliant as it does not deliver enough sites to meet identified need in accordance with PPTS/ NPPF.

In order to ensure this policy is sound it is necessary to either remove the requirement for the provision of Traveller pitches as part of large scale residential development in its entirety in the absence of any evidence to support this strategy, or the wording of the policy should be amended to read: "Traveller accommodation should be provided on *suitable* development sites of 500 homes or more whilst there remains an identified need..."

Concern about Policy H1 for developments of 500 homes or more to include provision for Traveller accommodation - developments of 500 to 999 homes being required to provide two pitches. We query whether this requirement is based on any particular evidence regarding the desire for those in Traveller accommodation to live on a small site of two pitches alongside the settled community, and whether any consideration has been given to how these pitches would be successfully integrated into the development whilst also meeting the requirements of the Traveller community.

There should be fewer traveller pitches. The proposals are for too many, more than other similar Boroughs. This density

Government guidance 'Planning Policy for Traveller Sites' and the definition of travellers is taken into account in the new Traveller Accommodation Assessment (TAA) 2017. The new TAA 2017 sets out how we have assessed the current and future accommodation needs of travellers residing in or resorting to Guildford borough and enables the setting of a locally set target for travellers' pitches and plots.

The reference to 'up to 9 pitches' in relation to small sites in paragraph 4.2.21 has been deleted.

Sufficient sites have been identified to meet the needs of travellers meeting the Planning Policy for Traveller Sites (PPTS) planning definition. The Plan also seeks to provide permanent pitches and plots to meet the assessed accommodation needs of travellers who do not meet the PPTS definition of a traveller and those households of unknown planning status.

The majority of the sites removed from the Green Belt will not be restricted by personal permissions. For the three sites that are to be restricted to personal permission this is due to the history of the site, the sensitive location and the personal circumstances put forward to justify temporary planning permission in the past.

To add the word 'suitable' in front of 'development sites' opens up the opportunity for interpretation discussions and does not help clarify the policy. The threshold was determined based on likely need for pitches and plots and was considered to be a reasonable approach to plan for a mix of housing (NPPF paragraph 50).

<p>and volume is unwarranted. Over-provision is inappropriate given other constraints. Spelthorne Council welcomes the fact that Guildford is seeking to meet all the assessed needs for gypsies and travellers for the plan period.</p>	
<p><i>Travellers:</i></p> <ul style="list-style-type: none"> The draft Plan identifies a ratio of 1 traveller site per 500 new housing units. This is not consistent with the site allocations as set out within amended Policies A1-A59 with some sites required to provide more pitches/plots than required by Policy H1 such as Garlicks Arch site A43. The Council should consistently ensure that only sites capable of delivering 500 or more dwellings should be required to provide pitches and plots. <p>A50 Whittles Drive is allocated for 14 Travelling Showpeople plots, which exceeds the overall assessed need of 8 places.</p>	<p>The requirement for traveller accommodation on sites of 500 dwellings or more is in addition to the allocated sites to ensure sufficient sites are provided to meet identified need. It will guide future planning applications. Site allocations have been considered individually and decisions made on their inclusion within the Proposed Submission Local Plan made on a case-by-case basis. Site A43 Garlicks Arch was allocated on the basis that it would provide 6 Travelling Showpeople plots.</p> <p>The land at Ash and Tongham is in fact many smaller sites, or sites already with planning permission, which may not trigger the threshold for pitch/plot provision. Sites A24 and A25 are likely to trigger the required threshold even though not all the housing may be delivered in the Local Plan period. Whittles Drive is allocated for 14 plots gross – only 2 additional.</p>

Self-Build:

- DCLG are explicit in its requirements for LPAs to plan for the needs of those that wish to build their own home. The Self-build and Custom Housebuilding Bill is an Act of Parliament. LPAs should take a proactive position to providing land and should undertake rigorous and effective evidence gathering to measure custom and self-build need in their districts.

The evidence for housing needs within the emerging Local Plan evidence base is centred on the West Surrey SHMA September 2015. The paper does make reference to custom and self-build and notes that the Government aspires to make self-build 'a mainstream housing option' and makes some attempt to quantify the demands for self-build in West Surrey. The paper states that the 2012 Guildford BC Housing Needs Survey revealed a very low interest in self-build in the borough. However, contact with custom and self-build specialist website Buildstore revealed a much higher indicative demand.

The council have not really tried to understand the demand for custom- and self-build in the borough. The SHMA simply concludes that there is 'modest' demand in the SHMA area with 'limited' supply. As a consequence, it is considered that the plan cannot be said to be *positively prepared* or *justified* as there has been no concerted attempt to establish the actual demand for custom or self-build within the borough beyond the data held by a single website.

The plan cannot be said to be consistent with national policy since the NPPF states that councils '*should look to plan for a mix of housing based on present and future demographics, market trends and the needs of different groups in the community including ... people who wish to build their own homes*'. Whilst the Local Plan mentions self-build opportunities in relation to the strategic allocations, there is

The Guildford Custom and Self-Build Register was established on 1 April 2016. It provides a useful indication of demand for custom and self-build plots in the borough.

Significant changes have been made to Policy H1 to address the demand for custom and self-build plots. A new requirement has been introduced that on sites of 100 homes or more 5% shall be available for sale as self-build or custom housebuilding plots. Additional paragraphs have been added to the reasoned justification (paragraphs 4.4.27a to 4.2.27d) to clarify the policy approach towards self-build and custom housebuilding.

On certain site allocations within the Proposed Submission Local Plan, the requirement to provide self or custom housebuilding plots is specified in the allocation.

The Council does not have to set a target for the provision of self-build or custom housebuilding plots (as is also the case for C2 care home bedspaces and student accommodation). However, the register will give a good indication of demand and our policy approach takes a positive pro-active approach towards identifying and planning for the provision of plots. It also states that we will support self-build and custom housebuilding if the proposed development has no adverse effect on local character; this gives flexibility to consider self-build and custom housebuilding on smaller housing sites and windfall sites. Any site that is suitable for market housing is also suitable for self-build or custom housebuilding as this type of housing falls within the same planning C3 use class category. Exceptions to this are higher density residential sites for flatted developments.

A new monitoring indicator has been added to monitor the number of planning permissions for self-build or custom build housing. Further details are set out in the Housing type, tenure and mix Topic Paper.

Government guidance is given on CIL contributions at:
www.gov.uk/guidance/community-infrastructure-levy#Self-Build-

no guarantee that the numbers that will be delivered will be sufficient to meet the demand in the area. The council should consider the opportunity for more than one approach which should include the allocation of dedicated self-build sites, giving choice and an opportunity for smaller landowners to come forward with sites. Large developers are considered likely to resist the provision of self-build plots on the strategic allocations preferring to build their own product. Furthermore, since the Local Plan does not state a minimum number of self-build plots that should be provided it is difficult to see how the council will ensure that sufficient are provided. As a consequence, it is considered likely that the provision of self-build opportunities will be unlikely to meet the demand in the borough.

The council's attempts to assess the demand for self-build are inadequate. The plan has therefore failed the test of soundness in terms of being *justified* and *consistent with national policy*. The 'opportunities' for self-build included on the strategic allocations within the plan are wholly inadequate as a means of meeting the demand for self-build in the borough. The plan has therefore failed the test of soundness in terms of being *positively prepared* and *consistent with national policy*. Dedicated self-build housing sites should be allocated in the Local Plan to meet the demands of those that wish to build their own home.

The strategic sites will start to come forward towards the end of the Plan period and therefore suitable provision should be made for Custom and Self-build which can be delivered earlier in the Plan period through smaller bespoke sites. The Council should support self-build proposals wherever they are proposed. The self-build register should provide a guide on where the Council should make appropriate provision for plots, however, this should not be used to prevent sites coming forward.

[Exemption](#). For information, all applicants on the Self-Build and Custom Housebuilding Register to date have been individuals rather than associations or groups.

Self-Build:

- The financial implications needs to be taken into account.

The policy needs to be made more flexible. The Council has not provided any justification or evidence for this policy. The policy should not be so prescriptive.

Policy H1 now stipulates a number of additional onerous requirements for residential development. Planning Practice Guidance states that evidence must demonstrate need and viability prior to implementing these standards.

The SHMA 2017 Addendum did not provide any further assessment of need and thus it is unclear to what extent the proposed 5% requirement will serve to meet Guildford's housing needs. The Council should clarify the need for self-build and custom build units over the plan period and how the 5% requirement relates to this need.

The Topic Paper states that there is no definitive number of self-build or custom housebuilding plots sought but that the approach that Guildford Borough Council has taken is to seek flexibility by specifying their inclusion on suitable site allocations over 100 homes. The draft policy specifies that 5% of the total homes shall be available as self-build and custom housebuilding plots 'whilst there is an identified need'. This approach is both unfounded and arbitrary. There is no basis for the selection of sites of over 100 units in size particularly bearing in mind the conclusion drawn in the SHMA that the majority are likely to come forward on small windfall sites; or the selection of the 5% requirement - the need for which the lpa itself acknowledges is uncertain: 'whilst there is an identified need'.

New Government legislation requires Councils to give suitable development permission for enough serviced plots of land to meet the demand for self-build and custom housebuilding in their area. The level of demand is established by reference to the number of people on an authority's register. The Council can best support and meet the demand for self-build and custom housebuilding in Guildford by requiring the provision of suitable plots on larger housing sites through the Local Plan. It is an approach taken by other local authorities with emerging or adopted Local Plans.

The Council has taken significant steps to address the potential future need for self-build and custom build plots by allocating sites and the introduction of the threshold in this policy. The evidence of need and demand for self-build and custom housebuilding plots is demonstrated through the numbers of applicants on the Guildford Self-Build and Custom Housebuilding Register. This data has been used, taking into account the likely impact of the new eligibility criteria, to make reasonable assumptions about the future need for this type of housing in Guildford Borough. An update to the Local Plan and CIL Viability Study looks at the impact on viability in respect of accessible homes and custom and self-build housing.

Farming and forestry workers:

- The Plan does not offer any option for the development of privately owned rural workers accommodation. NPPF 55 states “*Local planning authorities should avoid new isolated homes in the countryside unless there are special circumstances such as: the essential need for a rural worker to live permanently at or near their place of work in the countryside*”. Without accommodating the requirements for rural workers dwellings, the Plan may not “enable the delivery of sustainable development” in accordance with the NPPF, which according to Para 182 would be grounds to reject the Plan as unsound. In not providing a means by which rural workers dwellings can be built, the Plan may not have considered all of the objective development requirements within the Borough. As such there may be grounds to find that the Plan has not have been “positively prepared”.

An SPD should explain how farms can progress applications for rural workers dwellings, or Policies H1, H2, P1, P2, P3 are amended to include specific mention of NPPF55 “*the essential need for a rural worker to live permanently at or near their place of work in the countryside*”.

A planning application for a workers’ dwelling would be determined on its own merits and take into account the specifics of the case. The issue does not arise frequently in Guildford borough and it is not something that the Council considers need be addressed in a strategic policy. The NPPF provides overarching guidance on this issue and gives special circumstances where an isolated home in the countryside may be justified as an essential need for a rural worker. Policy RE11 in the Guildford borough Local Plan 2003 is extant and addresses the issue of new agricultural dwellings; this policy may be replaced in the Local Plan development management policies document.

H2: Affordable Homes

Main Issue	Guildford Borough Council Response
<i>Representations on Specific Issues</i>	
<ul style="list-style-type: none"> The definition of 'affordable housing' at 80% of market value is not genuinely affordable in this borough. 	<p>National guidance defines affordable rent as 'subject to rent controls that require a rent of no more than 80 per cent of the local market rent (including service charges, where applicable)' (https://www.gov.uk/guidance/definitions-of-general-housing-terms).</p>
<ul style="list-style-type: none"> The viability "get out" clause at paragraph 4.2.40 allowing developers to escape their responsibilities should not be included. 	<p>Viability is a material consideration in determining a planning application that is expected to provide affordable housing. The National Planning Practice Framework states that a viability assessment may be necessary in such cases 'where the deliverability of the development may be compromised by the scale of planning obligations and other costs' (Paragraph: 016 Reference ID: 10-016-20140306).</p>
<ul style="list-style-type: none"> Concern around change in Section 4.2.40, where there is in our view some softening of the language around the issue of developers needing to demonstrate lack of economic viability of affordable homes in order to reduce their standard quota (40%). 	<p>This paragraph has been amended to increase flexibility in dealing with developers' viability concerns; in particular, by deleting the reference to a cascade approach to providing affordable housing as the Council does not follow this mechanism rigidly in all cases and it is at discretion as to how best to take account of viability arguments.</p>
<ul style="list-style-type: none"> At paragraph 4.2.40 it is considered that the following wording should be retained: "In general, a need to make profit over and above the standard developer's profit in order to fund other community benefits will not be accepted as an abnormal cost". 	<p>The reference to not accepting non-standard developers' profits as an abnormal cost that would make making funding of community benefits unviable was superfluous, as it is clearly communicated by the previous (new) paragraph 4.2.39, which states that:</p> <p><i><u>"In considering viability, developers will be expected to have taken into account the costs of meeting policy requirements, including the provision of affordable housing and infrastructure requirements, in the price paid for a site. Where we consider that these requirements have not been</u></i></p>

	<p><i>satisfactorily taken into account in the purchase of land or of an option, we will not accept a lower rate of provision.”</i></p> <p>Rephrasing this paragraph means that developers are expected to factor in the costs of infrastructure under Section 106, as well as the level of profit that they seek from the site. If, after having allowed for the costs of these policy requirements, they cannot achieve above a normal level of profit, then we will not accept this as a viability argument to reduce the requirement on them to provide infrastructure requirements/community benefits. The Council will only accept evidence of a below standard profit margin as acceptable proof of non-viability.</p>
<ul style="list-style-type: none"> Do not accept the change of wording that dilutes the obligation ('must') to a wish ('seek') to have 40% of homes to be affordable. It is anticipated that Policy H2 as now drafted is likely to result in a massive diminution of affordable homes – possibly to below 10% as we have seen in the past and elsewhere. 	<p>This wording has been amended to allow greater flexibility in dealing with developers' viability concerns in relation to providing affordable housing contributions. The National Planning Practice Guidance supports this approach where it states at Paragraph: 006 Reference ID: 23b-006-20140306 that <i>“Where local planning authorities are requiring affordable housing obligations or tariff style contributions to infrastructure, they should be flexible in their requirements. Their policy should be clear that such planning obligations will take into account specific site circumstances.”</i></p>
<ul style="list-style-type: none"> The requirement to provide 40 per cent affordable homes on scheme of over 5 dwellings or 0.17ha in size, as sought through proposed policy H2, is supported in principle. However, although the subtext of Policy H2 refers to the viability testing which we support, no specific reference is contained within the policy itself. To ensure the policy fully complies with national planning policy and guidance, it is considered pertinent to provide direct reference to viability testing within the wording of policy H2 so that that 40 per cent of homes on qualifying sites will be sought for affordable housing, subject to the necessary viability testing. 	<p>Although it could improve clarity to developers to include references in Policy H2 to allowing for viability when setting the affordable housing contribution level, the reasoned justification adequately sets out the Council's proposed approach.</p>

<ul style="list-style-type: none"> Recommend that the Council amend the policy, or the viability section of the reasoned justification, on affordable homes to allow flexibility on the required percentage of affordable homes on developments that are making extraordinary contributions to infrastructure or transport works. The Council has the means to review individual project circumstances using Viability Assessments in order to determine the appropriate level of affordable housing on each such site. If the need for flexibility on such sites is not maintained, they may be blighted by not being able to create financially viable developments. 	<p>Paragraph 4.2.39 of the viability section states that the Council expects developers to take the cost of infrastructure requirements into account in the price paid for the sites they are intending to develop. If, however, there are exceptional infrastructure or other costs that would make a scheme genuinely unviable if the full 40% affordable housing on-site, off-site or financial equivalent contribution is to be paid, then the council will consider varying the tenure mix and/or number of affordable homes required on a site. Paragraph 4.2.39 – 4.2.40 clearly outlines this intended approach.</p> <p>The option to seek a variation from the normal affordable housing contributions would therefore be a matter of negotiation with the Council. The cost of any financial appraisals must, however, be borne by applicants, whether these are prepared by the Council or by developers themselves. This system of raising affordable housing contributions is sufficiently flexible and ensures maximum provision of affordable housing towards meeting the considerable local need, whilst at the same time ensuring that all sites remain viable.</p>
<ul style="list-style-type: none"> The Policy needs to reflect the Government’s national threshold of over 10 homes and which have a maximum combined gross floorspace of no more than 1,000sqm, even though this policy was drawn up after the Government’s 10 dwelling threshold had been successfully challenged, as that decision has now been overturned. <p>Only in designated areas such as AONB may a threshold of five homes be required.</p> <p>The evidence referred to in the Local Plan pre-dates the re-introduction of the National Government policy.</p>	<p>Although legislation requires the consideration of the national affordable housing threshold, it is possible to divert from this if evidence of affordable housing need and development viability directs this. In the High Court case, 31 July 2015 West Berkshire and Reading Councils the QC for the Secretary of State explained that:</p> <p><i>“(i) As a matter of law the new national policy is only one of the matters which has to be considered under section 70(2) of TCPA 1990 and section 38(6) of the PCPA 2004 when determining planning applications or formulating local policies (section 19(2) of PCA 2004), albeit it is a matter to which the Secretary of State considers “very considerable weight should be attached; ……</i></p> <p><i>(iv)…if in future an LPA submits for examination local plan policies with thresholds below those in national policy, the inspector will consider whether the LPA’s evidence base and local circumstances justify the LPA’s proposed thresholds. If he concludes that they do and the local</i></p>

	<p><i>plan policy is adopted, then more weight will be given to it than the new policy in subsequent decisions on planning applications.”</i></p> <p>A letter from the Planning Inspectorate was issued to the London Borough of Richmond upon Thames in March 2017, apologising for inspectors’ <i>“errors in approach and judgement”</i> in two appeal decisions in which they had afforded considerably lesser weight to Local Plan affordable housing policies that pre-dated the WMS. This letter clarifies national policy and justifies the argument for Local Plans deviating from the 11-unit threshold where there is sufficient evidence of local need for affordable housing.</p>
<ul style="list-style-type: none"> The threshold should be set at 11 units or more. There is also no justification for setting an additional area threshold of 0.17 hectares. 	<p>The 0.17ha threshold represents 5 units at density of 30 dph. The Policy seeks to secure affordable housing on sites that could accommodate at least 5 units.</p> <p>The area threshold was included to prevent applicants from purposely proposing less dense development to evade the affordable housing contributions requirement. In this respect, the Policy is similar to the 2003 Local Plan Policy H11.</p>
<ul style="list-style-type: none"> Suggest using a local definition of affordable housing. 	<p>It is a requirement by law to use the national definition of affordable housing, qualified in interpretation of “no more than 80 per cent of the local market rent (including service charges, where applicable’ (NPPF Annex 2: Glossary and https://www.gov.uk/guidance/definitions-of-general-housing-terms).</p>
<ul style="list-style-type: none"> The 40% level is considered unrealistic as affordable housing completions as a proportion of total supply have only hit 31% of the period 2008-2013 (paragraph 3.2.5 Local Plan Viability and Affordable Housing Study, December 2014). This is without the added burden of a CIL charge. 	<p>The requirement for 40% is justified by evidence of need and is realistic and achievable. Provision of affordable housing will be sought on qualifying sites only (those over the site size threshold), subject to viability; the plan is not requiring 40% of all homes built to be affordable. If every site over the 5-home (gross) threshold provides 40%, this will equate to less than 40% of total future housing development.</p>

<ul style="list-style-type: none"> The proportion of affordable housing should remain consistent with the current policy of 35% with clear flexibility written into the policy to reduce this when development would otherwise be unviable. 	<p>Need is demonstrated as is viability (see key evidence). Therefore seeking 40% is justified.</p>
<ul style="list-style-type: none"> The current wording of the policy seeks to achieve a minimum of 40% affordable housing, suggesting that the rate sought may indeed be higher. The Council's viability has appraised the affordable housing threshold of 40%, but has not tested any higher scenarios and as such, the Council is unjustified in seeking higher requirements. 	<p>The 40% requirement is the minimum percentage of affordable housing that the Council would seek under Section 106 on any planning application for residential development. If a developer were willing to provide a higher proportion than this and it is viable for them to do so, then this is something that we would encourage, but would not require.</p>
<ul style="list-style-type: none"> This Policy has been weakened by changing the wording of the policy from "At least 40 per cent of the homes on these sites must be as affordable homes" to "We will seek at least 40 per cent of the homes on these sites as affordable homes." Simply "seeking" to achieve 40 per cent affordable homes, is not the same as making this provision a "must". <p>The aspiration for London is that 50% of all new homes should be affordable within the next 10 years and lower land values should make this target achievable in Guildford now. I therefore believe that the target should be increased from 40% to 50%.</p>	<p>The National Planning Practice Guidance supports the flexibility in our proposed policy where it states at Paragraph: 006 Reference ID: 23b-006-20140306 that: <i>"Where local planning authorities are requiring affordable housing obligations or tariff style contributions to infrastructure, they should be flexible in their requirements. Their policy should be clear that such planning obligations will take into account specific site circumstances."</i></p> <p>The Local Plan Viability and Affordable Housing Study (Peter Brett Associates, October 2016) assessed the viability of the sites in the Local Plan to provide CIL as well as a 40% affordable housing contribution. The modelling results showed that most sites were viable at this proportion of units; however, the study did not support a higher proportion. Previous viability studies (Affordable Housing Viability Study, 2008, and Affordable Housing Viability Update Study, 2011) had also indicated that 40% would be the most appropriate target from a viability perspective.</p>

<ul style="list-style-type: none"> The draft policy also includes a tenure requirement of 70% social rented. This is prescriptive and likely not to be consistent with national planning policy (for example, it does not reflect the recent imposition of starter homes included in the Housing and Planning Act 2016). 	<p>The tenure split of 70% affordable rented/30% other forms of affordable housing was based upon the Guildford Borough Housing Strategy 2015-2020. 70% rented is a justified proportion. The Housing Strategy states that, due to high house prices in this area, non-rented tenures tend to cater only for a small proportion of the population (those who cannot afford to purchase outright, but who can get a mortgage and afford to purchase a share of an expensive property).</p> <p>Although proposed in the Housing White Paper, Starter homes currently do not form part of the definition of affordable housing. The Housing White Paper (p59) also confirms that the Government has abandoned its previous proposal to require at least 20% of new homes to be starter homes, as it would have an impact on delivery of more traditional models of affordable housing. Unlike the traditional models, they do not provide genuinely affordable housing (which is required to remain affordable in perpetuity).</p>
<ul style="list-style-type: none"> Assisted living / extra care housing includes additional costs relative to C3 housing. Due to viability, this Policy should not apply to assisted living / extra care housing. 	<p>Subject to these types of housing falling under Use Class C3, Policy H2 should apply equally to them. This is in line with Policy H1, which encourages specialised forms of accommodation including retirement homes and, in some cases, assisted living and extra care housing on a case-by-case basis (where any viability arguments can be considered). The Policy does not impose any requirement on developers to provide such accommodation. Paragraph 4.2.35 adequately outlines the Council's approach.</p>

<ul style="list-style-type: none"> • Too many unknown infrastructure costs to know that sites of 10 homes or more will be viable with 40% of affordable homes, particularly on strategic sites. <p>In particular, the Borough Council and Highways England have still to agree the details of the Road Infrastructure Strategy (see comments on RIS schemes) and the details of the proposed Sustainable Movement Corridor (SMC) have not been costed and confirmed.</p> <p>Also CHP provision and tighter water efficiency standard.</p> <p>These unknown costs to be borne by developers of strategic sites will affect development viability, resulting in the affordable housing contribution (one of very few negotiable costs) being reduced.</p>	<p>The current policy requirement is usually complied with, indicating that the current policy requirement is viable. Viability evidence supports the 40% figure.</p>
<ul style="list-style-type: none"> • In order to be effective, draft Policy H2 should require a 'target', consistent with overarching affordable housing policy. Numerous Inspectors' decisions have supported the use of a target, rather than set level of provision. 	<p>NPPF paragraph 47 requires a trajectory for market housing. However, whilst some Local Plan inspectors may support provision of a target for affordable housing provision, it is not a suggestion or requirement of national policy or guidance.</p>
<ul style="list-style-type: none"> • Suggest that the following text should be added after paragraph 4.2.39 of the Reasoned Justification : <p>"Where developers demonstrate to our satisfaction (informed by an independent expert critique) that the amount of affordable housing proposed is the maximum amount a scheme can afford, as a consequence of abnormal costs or other circumstances, this policy will be treated as being satisfied, subject to agreement to the introduction of a 'cascade mechanism ' within the S106 planning obligation so as to contemplate alternative provision should development viability so allow in the future".</p>	<p>Guildford Borough planning obligations do often include an overage clause, where a lower percentage contribution is negotiated. However, it is unnecessary to refer to this specifically in the Reasoned Justification. The current wording sufficiently covers this point.</p>

<ul style="list-style-type: none"> Along with ensuring the threshold reflects the latest legal and national policy situation, we propose the following amendments to ensure adequate flexibility and continuous delivery over the plan period: <i>“...The tenure and size of affordable homes provided on each qualifying site must contribute, to the Council’s satisfaction, towards meeting the mix of affordable housing needs reflecting local demand and having regard to identified in the Strategic Housing Market Assessment 2015, or subsequent affordable housing needs evidence. This currently includes a tenure split of at least 70% rented, with the remainder being other forms of affordable housing. Affordable rent must be no more than the maximum level set out in our most recent housing guidance or strategy. Developers will be...”</i> It is also proposed that the following should be added to the policy to ensure deliverability: <u><i>“Proposals that are unable to meet affordable housing requirements will be supported by clear viability evidence to establish deliverability.”</i></u> 	<p>The reference to ‘needs identified in the Strategic Housing Market Assessment 2015, or subsequent affordable housing needs evidence’ is sufficient.</p> <p>The Reasoned Justification to Policy H2 covers viability issues in paragraphs 4.2.38 – 4.2.44.</p>
<ul style="list-style-type: none"> C2 housing should not be included within the requirement for delivery of affordable housing, due to the specialist nature of the dwelling usage. The wording for consideration on a ‘case-by-case’ basis is not definitive and should be removed altogether. 	<p>The nature of care provided at residential developments falling under the C2 use class is wide-ranging and includes secure residential accommodation as well as private residential accommodation that has an element of care provided.</p> <p>The degree of self-containment of these types of accommodation varies, as does the level of personal care, which ranges from occasional visits from a carer, which would not be much above the level offered in general housing in the C3 use class, to a significant number of hours of care in order to allow an occupant to live independently. Therefore, it makes sense to adopt a flexible approach to assisted living and extra-care housing schemes that considers arguments for amending the requirement for an affordable contribution on a case-by-case basis.</p>

- Assisted living accommodation for older people generates additional costs relative to residential development (Use Class C3) due to the need for specialist design and specification, the sacrifice of saleable area for the provision of services and facilities with no compensating income, and other differentiating factors. Inevitably, in reaching a competitive land value an affordable housing provision equal to that assumed by non-standard housebuilders bidding on the site cannot therefore be sustained.

Draft Policy H2 currently states such schemes *'may be required'* to make an affordable housing provision, which will be considered on a case-by case basis. As such there is no certainty as to whether GBC will seek an affordable housing contribution, which is likely to result in every developer wishing to provide such housing having to undertake a viability appraisal and negotiate accordingly with GBC, adding unnecessary expense and time delays to schemes providing much needed forms of housing.

Draft Policy H2 is somewhat contradictory within the reasoned justification, stating at Paragraph 4.2.35 that it does not apply to residential institutions such as care homes or nursing homes, then in the next sentence stating assisted living, extra care and other C2 developments may be required to make provision. Given that the majority of care homes or nursing homes will fall within Use Class C2, there is no clarity as to whether Policy H2 applies or not in these instances.

Paragraph 4.2.35 is clear that the affordable housing contribution requirement in Policy H2 does not apply to care homes or nursing homes. However, in the case of other residential developments providing an element of care, it would not be appropriate for this policy to be as definitive, as there can be considerable differences in the degree of self-containment of the accommodation, which can amount to a change in the use class (i.e. either C2 or C3). Unless the details in planning applications clearly indicate to the contrary, then where assisted living schemes are self-contained, with a low level of care provision, and therefore fall under Use Class C3, Policy H2 should apply equally to them.

Notwithstanding the additional costs relating to assisted living developments, it would not be fair to reduce the affordable housing requirement for those schemes that contribute towards the general market housing stock. In these cases, details of the proposed scheme will need to be considered alongside any viability arguments on a case-by-case basis in order to establish the use class and whether the policy should apply to such developments.

<ul style="list-style-type: none"> The previous version of the plan (Policy 4.2.23) stated that Developers will be expected to provide land for affordable homes at nil value. Now the Plan says "Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site". 	<p>The reference to the Council expecting developers to provide land for affordable housing at nil value was incorrect and therefore deleted in the 2017 version. The residual land value forms part of the viability assessment and has to take developers' planning obligations and infrastructure costs into account as well as their profits.</p>
<ul style="list-style-type: none"> The Policy states: "<i>Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.</i>" This means that the developer does not even have to provide any 'affordable' homes, but just to make a negotiated payment to the Council. I doubt this is likely to result in the construction of any 'affordable' homes. 	<p>This is standard wording for a local plan affordable housing policy and is NPPF compliant. Paragraph 173 of the NPPF states that the costs of requirements likely to be applied to development, such as for affordable housing, should, when taking account of the normal cost of development and mitigation, provide competitive returns to landowners and developers.</p>
<ul style="list-style-type: none"> Support the proposals for the mix of affordable homes. However, the mix of property size and classification of type must be amended to ensure a significantly higher proportion of family homes are included and the number of single bedroom properties is reduced within allocations. 	<p>The property size and type should reflect the site size, characteristics and location, as Policy H1 (1) indicates. Paragraph 4.2.3 also explains that the 2015 SHMA and Addendum Report 2017 provide evidence of a need for smaller-sized dwellings across the borough, with 40% of demand for 1-bedroom and 30% for 2-bedroom properties.</p>
<ul style="list-style-type: none"> Policy H2, paragraph 4, needs to include that any funds paid in lieu of affordable housing should be ring-fenced and the wording further tightened by replacement of "expect" by "will enable". The tone of many of the policies has been relaxed too much and the words expect, may, should etc. must be replaced with words that ensure the policies will be followed rather than the weaker terms that will be exploited are currently used. 	<p>The suggested wording to replace 'expected to enable' with 'will enable' would not make the policy more restrictive for developers. There is also no need to refer to ring-fencing contributions within this policy, as this is not part of the requirements for developers.</p> <p>Some of the terminology was toned down from the 2016 version of the plan where there is scope either for negotiation based on genuine viability issues or where the Council is able to use its discretion. This is in line with national planning policy on these areas. In Policy H4 it is more appropriate to use '<i>may be provided</i>' to allow for instances where a viability assessment shows it to be unviable to provide any kind of affordable housing contribution. The NPPF indicates at paragraph 173 that the costs of providing affordable housing should provide competitive returns to landowners and developers after factoring in the normal costs of development and mitigation.</p>

<ul style="list-style-type: none"> Point 4 should be removed; affordable housing should be included in the main site, as it creates a better society when social housing is not separated from other developments. 	<p>The reasoned justification to Policy H2 clarifies that allowing an off-site contribution or payment in lieu would be an exception to the requirement to provide affordable housing on site. This preference for on-site provision of affordable housing encourages the integration of affordable housing into every new development. However, it is not always practical to do so and, in cases where on-site provision is not feasible, the aim will be to ensure appropriate integration of the affordable housing funded by the proposal on alternative sites.</p>
<ul style="list-style-type: none"> Affordable housing definition in the appendix - includes social housing but makes no distinction of percentages. 40% affordable housing is mandated and at least 20% of it should be social housing. 10% should be dedicated to being Community Land Trust housing and/or certain smaller developments should be handed to a local group to create a Community Land Trust. There are not enough truly affordable housing options being considered, and Community Land Trusts, amongst other options, should be mandated. In addition, social housing should be clearly defined as 'secure tenancies'. <p>Overall, the definition of affordable housing very vague, and makes it too easy for developers to make excuses for not providing affordable housing. In addition, truly affordable housing possibilities (such as Community Land Trusts), are not considered or mentioned, which is currently a disappointing missed opportunity.</p>	<p>'Social housing', and 'affordable housing' mean different things to different people. The Council's view is that both refer generally to subsidised housing. Social Rented housing is a specific type of housing with rents set according to central government guidance on 'target rents' which are in practice around 50% of market rent. Affordable Rented housing is let on similar tenancies but at up to 80% of market rent. Guildford Borough Council require the rents Affordable Rented properties to be set at no higher than the Local Housing Allowance.</p> <p>The requirement is for 40% of the properties on the site to be affordable homes. At present, our requirement is for 70% of these to be for Affordable Rent, with rents set at the lowest of either Local Housing Allowance or up to 80% of local market rents. These homes must remain affordable in perpetuity. Tenants of affordable rented homes owned by GBC have the same rights and security of tenure as social rented homes, and the homes are let to people from the Council waiting list who are eligible for social rented housing. Some Affordable Rented homes are owned and managed by registered providers (housing associations), and are let in the same way.</p> <p>Since the rents for Affordable Rented homes are higher than for social housing, these homes generate more funds, which GBC (or other Registered Providers) can use to help build more social homes. The Government ceased capital funding for social rent some time ago, making it financially very difficult to provide social rented homes, as the rents do not cover the interest on the loan required to build them. It would not be feasible to require developers to build social housing</p>

	<p>themselves as they are unlikely to be as profitable as affordable rented housing and therefore either fewer housing schemes would be built, or developers would be able to provide evidence that the requirement made schemes unviable. This would then force us to reduce the number of affordable homes that we could ask them to provide under section 106.</p> <p>National planning guidance sets the definition of affordable housing and the Submission Local Plan refers to this in the glossary in Appendix A. The appendix specifies the type and tenure of the affordable housing, and that it must be managed by a Registered Provider. Beyond that, it would not be practical to specify the legal form that the provision should take, i.e. a community land trust. However, if a community land trust approached the Council (or a developer) then there is no reason why they could not take over building and managing part of a development, as long as it met the government's definition of affordable housing. Those homes could include Affordable Rented housing, and/or form part of the other 30% of the proportion of homes that are affordable.</p>
<ul style="list-style-type: none"> At paragraph 4.2.35, the Plan identifies the types of residential accommodation within Use Class C3 where affordable housing will be sought. In accordance with PPG paragraph 21 (as referred to in paragraph 9 above), it is recommended that the Plan specifically states that student accommodation is not required to provide affordable housing due to its ability to increase the availability of low cost housing. 	<p>The paragraph is already clear that the policy applies only to new homes in the C3 use class, regardless of whether they are to be occupied by students. Non self-contained student accommodation (e.g. halls of residence) is either 'sui generis' or use class C4, depending on circumstances, and therefore is exempt from the requirement for an affordable housing contribution. Such housing does not come under the category of affordable housing, which must be available to residents on the housing waiting list and remain at an affordable price for future households.</p>

H3: Rural exception homes

Main Issue	Guildford Borough Council Response
<p>Representations on Specific Issues</p>	
<p><i>Changes to wording:</i></p> <ul style="list-style-type: none"> The policy wording should define “closely related to”, and should not include safe and easy walking distance. 	<p>Terms such as this are difficult to define and are best left to the decision maker (development control case officer, Planning Committee or Secretary of State) to judge in light of the specific circumstances.</p>
<ul style="list-style-type: none"> The policy wording should define small, either in land size, or number of units. If ‘small’ is left undefined, the policy could be used to justify significant developments. 	<p>Paragraph 4.2.48 of the Submission Local Plan allows flexibility to be able to determine the definition of ‘small scale’ in relation to local affordable housing need and previous applications for rural exception housing.</p>
<ul style="list-style-type: none"> The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular, adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be "closely related". 	<p>In relation to the suggestion to define the term “closely related to”, this is difficult to define in a broad all-encompassing way and is best left to the decision maker (development control case officer, Planning Committee or Secretary of State) to judge in light of the specific circumstances that will vary for each site and proposal. Such circumstances are likely to include the extent to which the proposed development would relate to an existing rural settlement and the ease and safety of the walking route to and from that settlement.</p>
<ul style="list-style-type: none"> The following wording should be included in the policy: <i>“to enable it to be consistent with national policy “market housing will be allowed where it has been proved that it is necessary to make the affordable housing provision viable.”</i> Object. Justify inclusion in paragraph 4.2.52 of <i>‘We may also consider allowing at least one market home where this would result in a significant improvement in the housing mix (tenure, type or size) or rent levels’</i>. 	<p>As inclusion of market housing is at the local authority’s discretion, it is not necessary to include this in the policy.</p> <p>Including in the Reasoned Justification that <i>‘we may also consider allowing at least one market home where this would result in a significant improvement in the housing mix (tenure, type or size) or rent levels’</i> complies with NPPF paragraph 54, and with the Glossary definition of Rural exception sites.</p>

<ul style="list-style-type: none"> State how allowance of market home to improve housing mix complies with NPPF; otherwise update statement to comply with NPPF. 	<p>The NPPF definition states that local planning authorities may allow small numbers of market homes <i>‘for example where essential to enable the delivery of affordable units without grant funding’</i>. This is only an example of why we could choose to allow small numbers of market homes.</p>
<ul style="list-style-type: none"> The following additional bullet point should be added to Policy H3: <ul style="list-style-type: none"> <i>‘market housing will be allowed where it has been proved that is necessary to make the affordable housing provision viable’</i>. <p>The above wording would enable Policy H3 to be more consistent with national policy in accordance with the NPPF tests of soundness.</p>	<p>Paragraphs 4.2.52 – 4.2.52 of the reasoned justification to the policy adequately cover our local policy in relation to allowing market homes as part of rural exception housing schemes and make the same point.</p> <p>Paragraph 54 of the NPPF states that local authorities should consider allowing some market housing on rural exception sites in certain circumstances. However, it is not an obligation to make such an allowance. It is therefore preferable to state the approach of allowing market housing in the reasoned justification rather than as part of the policy, to emphasise that it is an exception to the norm for such schemes.</p>
<ul style="list-style-type: none"> The policy wording itself does not require the local connection requirement for tenants to be secured in perpetuity (for subsequent occupants); it only requires the affordability must only be secured in perpetuity. The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal. 	<p>The local connection requirement is a requirement of national policy as rural exception housing by definition needs to include it; it does not therefore need to be repeated in the text of Policy H3 in order to be able to defend it. The reasoned justification that supports the policy does, however, elaborate in more detail on the Borough’s intended approach for establishing whether a local connection exists and, indeed, whether there is affordable housing need in the area.</p> <p>The Policy specifies that such housing must be retained as affordable to meet <i>‘the identified housing needs of the local community’</i>, and <i>‘the affordable homes must be secured in perpetuity’</i>. Where a local housing needs survey demonstrates a need within the parish, each subsequent tenant would therefore have to meet the local connection requirement; this would be enforced by way of a S106 planning obligation, which would bind successors in title. The definition of ‘local’ will also be set out in the planning obligation.</p>

<ul style="list-style-type: none"> • Objection to the deletion of paragraph 4.2.54 ('to ensure that housing is secured permanently to meet local affordable housing needs.....in accordance with its published scheme Guildford Home Choice (or equivalent scheme)') as it links to provisions in the removed paragraph 4.2.54. <p>It is essential that housing delivered by Policy H3 is for those identified with local connections.</p>	<p>The reasoned justification for Policy H3 was amended in the 2017 Submission Local Plan to remove reference to a cascade approach, as it was misleading and could have applied to a specific approach that is not necessarily being applied in Guildford borough.</p> <p>The policy and reasoned justification specify that housing must be retained as affordable for the local community in perpetuity and this is stated in national planning policy.</p>
<ul style="list-style-type: none"> • The policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances." 	<p>There is no need for exceptional circumstances for Green Belt release for rural exception housing (National Planning Practice Guidance Paragraph: 001 Reference ID: 50-001-20160519) encourages the development of rural exception housing as it helps to meet the issues that face rural areas in terms of supply and affordability. The NPPF defines rural exception sites as being for use "...where sites would not normally be used for housing", i.e. on rural sites in the Green Belt. Paragraph 89 of the NPPF makes clear that they are an exception to normal Green Belt policy. GBC would therefore support, rather than seek to limit, suitable applications for rural exception housing developments that are in accordance with Policy H3.</p>
<ul style="list-style-type: none"> • The wording of the policy is far too wide and drives a coach and horses through all other aspects of planning policy. As drafted, the planning authority could be obliged to grant permission for inappropriate and unsuitable developments. <p>The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. The Policy should include the need for a balancing exercise including consideration whether more suitable locations exist.</p>	<p>If an application for a rural exception housing scheme came forward in an area that was subject to protective area designations, then the application would need to be considered against those, as well as the criteria of policy H3. Small-scale development in the AONB is permissible under national policy, which states that only major developments in these areas should be refused (NPPF paragraph 116).</p>

<ul style="list-style-type: none"> Object, as the policy will allow new homes to be built in the countryside on agricultural land and on AONB in the Green Belt outside of settlement boundaries in contravention of NPPF. 	<p>Rural exception housing is by definition housing in locations that other policies would otherwise not permit. The NPPF explains this in the glossary entry for ‘rural exception sites’ on page 55 and at paragraph 54.</p>
<ul style="list-style-type: none"> NPPF paragraphs 87-89 (Green Belt development) apply, and “exceptional circumstances” or “very special circumstances” will have to be proved, which should be included in the Policy. 	<p>NPPF paragraph 89 specifically includes “limited affordable housing for local community needs under policies set out in the Local Plan” as an exception to the general inappropriateness of new buildings in the Green Belt.</p>
<ul style="list-style-type: none"> Objection to permitting some market housing in these Green Belt developments outside villages. In the borough, market housing often means large executive homes. 	<p>The policy wording does not actually allow for inclusion of market housing. However, the option to allow this has been retained within the Reasoned Justification (subject to submission of a development appraisal) in order to be consistent with national policy, which allows small numbers of market homes at the local authority’s discretion, for example to make the scheme viable without the need for grant funding.</p>
<ul style="list-style-type: none"> The reasoned justification to the policy (in paragraph 4.2.52) should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer-led proposals, which will be difficult to resist. 	<p>The NPPF (glossary) states that local planning authorities may allow small numbers of market homes as part of a rural exception housing scheme, <i>‘for example where essential to enable the delivery of affordable units without grant funding’</i>.</p> <p>Paragraph 4.2.52 already includes appropriate wording to avoid the inflation of land values by including more market homes within rural exception schemes than necessary to make those schemes viable. There is therefore no need to amend the Local Plan wording.</p>

<ul style="list-style-type: none"> The Policy should help provide rural exception housing to meet local village and parish needs, NOT borough-wide housing need. <p>This provision for cascade to adjacent parishes and then to the rest of the borough if there is not the need within the village or parish threaten to go well beyond the NPPF definition of “local”.</p> <p>See High Court decision <i>Old Hunstanton Parish Council v Secretary of State for Communities and Local Government & Ors</i> [2015] EWHC 1958 (Admin) (15 July 2015)</p> <p>Confirm these cascade provisions comply with NPPF; otherwise update statement to comply with NPPF.</p>	<p>The reasoned justification for the policy was amended in the 2017 Submission Local Plan to remove reference to a cascade approach, as it was misleading and could have applied to a specific approach that is not necessarily being applied in Guildford borough.</p> <p>New rural exception housing is only allowed to be built if a recent local housing needs survey has demonstrated there is a need in the parish. In addition, rural exception housing is allocated only to those applicants with a local connection (this is secured through a S106 planning obligation, which is binding on first and subsequent applicants).</p> <p>Applicants on the housing waiting list from other parishes may be considered for rural exception housing on a change of tenancy if a recent housing needs survey demonstrates that no affordable housing need exists in the parish. This would be written into the S106 agreement. It would be preferable to let a property out to meet the wider needs of adjoining parishes than to leave it vacant.</p>
<ul style="list-style-type: none"> Cannot legally keep these homes permanently as affordable for local people only. 	<p>Rural exception sites are allocated to people with a local connection, and may only be opened wider where there is no local need on re-letting, which is considered preferable to having them empty. They are secured in perpetuity as affordable housing, as they are, in general, specifically exempt from the right to buy and to acquire. If they were to be sold in future then the council would required them to be sold to a housing association rather than to a private developer and the HA would need to sign a new S106 agreement to agree to continue to apply the rural exception criteria.</p> <p>Note that special rules apply to the granting of rural exception schemes in East Horsley and Send, which are not exempt from the right to buy or acquire – see footnote 1 of the Plan.</p>

<ul style="list-style-type: none"> • Unsound plan, as not compliant with national policy. Traveller pitches should not have to : <ul style="list-style-type: none"> • be within easy walking distance of a settlement. This is unacceptable as sites so close to settlements will rarely if ever be acceptable to local communities. • meet or contribute to meeting local affordable housing need, and • be secured as affordable homes in perpetuity. <p>Paragraph 10 of Planning Policy for Traveller sites requires Local Plans to set out criteria to deal with applications irrespective of need.</p> <p>Paragraph 4.2.49 says “Traveller exception housing will be provided on council owned public pitches on small, suitably located sites in the Green Belt.” This is not consistent with Green Belt Policy P2 which does not allow for such development.</p>	<p>These requirements relate to <u>rural exception traveller sites only</u> and are <u>not a requirement for all traveller pitches</u> in the borough. This draft policy complies with the NPPF Planning Policy for Traveller sites, August 2015.</p> <p>Paragraph 15 of the PPTS states that rural exception traveller sites should meet the affordable housing needs of local travellers and remain affordable in perpetuity. It also states that all pitches for travellers should be sustainably located and ‘<i>provide a settled base that reduces both the need for long-distance travelling and possible environmental damage caused by unauthorised encampment</i>’ (paragraph 13).</p> <p>Policy H3 covers rural exception homes in the Green Belt, including rural exception traveller sites.</p>
<ul style="list-style-type: none"> • In nearly every case, the applicant and owner of a rural workers’ dwelling would be a commercial farm business. This precludes the use of Policy H3 within a commercial farming context. 	<p>The owner would need to be a Registered Provider or the Council.</p>
<ul style="list-style-type: none"> • Objection to Policy H3 – Rural Exception Homes. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the "mix" this can include "market" housing. This policy means building anywhere, and ignoring all historic planning restrictions. 	<p>Rural Exception Housing is defined in the introduction to the Policy H3 chapter as well as in the glossary and in the NPPF; the policy wording reflects this.</p> <p>The policy specifies that such housing must be retained as affordable to meet “identified housing needs of the local community in perpetuity”. Where a local housing needs survey demonstrates a need within the parish, each subsequent tenant would therefore have to meet the local connection requirement.</p>

P1: Surrey Hills Area of Outstanding Natural Beauty and Area of Great Landscape Value

Main Issue	Guildford Borough Council Response
<p><i>Representations on Specific Issues</i></p>	
<ul style="list-style-type: none"> Independent review of land to north east of Hog's Back concludes that this area (including Blackwell) meets Natural England's AONB criteria. 	<p>In 2013 Hankinson Duckett Associates (HDA) were commissioned by Surrey County Council (SCC) and the Surrey Hills AONB Board to undertake a Landscape Character Assessment of the AONB and AGLV, which would inform a later review of the AONB boundary by Natural England. Blackwell Farm was included within the area of search but not recommended for inclusion within the AONB as it does not meet Natural England's latest AONB designation criteria. There has been no subsequent new guidance issued by Natural England. The Council considers that the HDA study remains robust and has been endorsed by other Councils, the Surrey Hills AONB Board and SCC.</p>
<ul style="list-style-type: none"> Activities and developments outside the boundaries of AONBs that have an impact within the designated area are covered by the statutory 'duty of regard'. The Policy should be amended to make it explicit that development that would adversely impact the setting of the AONB, through either harm to public views into and from the AONB or by some other impact, will not be permitted. 	<p>Policy P1 emphasises that development proposals within the AGLV will be required to demonstrate that they would not harm the setting of the AONB or the distinctive character of the AGLV itself. Policy P1 has also been amended to include reference to the need to protect the setting of the AONB.</p>

<ul style="list-style-type: none"> Policy weakens existing protection to AONB when it should strengthen it. <p>Policy provides insufficient protection against development within AONB.</p>	<p>Policy P1 accords with the NPPF in that it attaches great weight to preserving the scenic beauty and landscape of the AONB. The supporting text to P1 also acknowledges that AONB's should be afforded the highest level of policy protection. Accordingly, the policy states that there will be a presumption against major development in the AONB unless exceptional circumstances are demonstrated and the application is proven to be in the public's interest. In considering such applications, the council will have regards to the criteria contained with paragraph 116 of the NPPF.</p>
<ul style="list-style-type: none"> All land that has been assessed as meeting Natural England's latest AONB criteria should be afforded the same level of protection as the AONB. 	<p>Natural England has confirmed that AONB candidate areas do not have the same status as the AONB.</p>
<ul style="list-style-type: none"> Object that AONB areas are excluded from taking proportion of new housing developments 	<p>Policy P1 does not preclude residential development from occurring within the AONB and two sites have been allocated for such development (where the proposals would not harm the scenic beauty or landscape of the AONB). However, in accordance with the NPPF, there will be a presumption against major development in the AONB.</p>
<ul style="list-style-type: none"> The policy relating to AONB weakens the protections offered, and (unlike previously) does not have restrictions on non-major development. This is a move in the wrong direction. Previously all proposals were considered against the 5 key tests - now development in the AONB seems to be more acceptable. This is weaker, not stronger, and is contrary to huge responses from the public in previous consultations and the weight of protection given to AONB in the NPPF. There should be reference to views, wildlife and cultural heritage. 	<p>The Policy makes reference to landscape, scenic beauty, natural beauty and setting in line with the NPPF. The Policy also makes clear that development proposals will be assessed against the provisions of the Surrey Hills AONB Management Plan. That plan in its Land Use policies, Historic and Cultural Policies and Biodiversity Management Policies provides advice and guidance on views, wildlife and cultural heritage. This is a material consideration.</p>

P2: Green Belt

Main Issue	Guildford Borough Council Response
<p>Representations on Specific Issues</p>	
<p><i>Plan should identify safeguarded land:</i></p> <ul style="list-style-type: none"> • In case of non-delivery, and <p>to ensure the Green Belt endures well beyond the plan period.</p>	<p>The Council does not consider that safeguarding of land for future development is appropriate within the Guildford context. The reasons why are set out in more detail in the Green Belt and Countryside Topic Paper (paragraphs 4.76 – 4.83).</p>
<p><i>Villages should remain washed over:</i></p> <ul style="list-style-type: none"> • Preserves the identity and character of villages. <p>Protects from inappropriate development.</p> <p>Prevents merging settlements.</p> <p>Contrary to NPPF.</p> <p>Not justified.</p> <p>No exceptional circumstances.</p>	<p>Paragraph 86 of the NPPF requires that only villages which contribute towards the openness of the Green Belt remain washed over by the Green Belt. This provides the exceptional circumstances to justify inseting relevant villages. Other planning policies will ensure that any development that occurs in these villages is sustainable.</p>
<p><i>Major previously developed sites:</i></p> <ul style="list-style-type: none"> • Should remain in the Green Belt. <p>No justification for insetting them.</p> <p>Should not be treated the same as villages.</p>	<p>The justification for insetting major previously developed sites is covered in the Green Belt and Countryside Topic Paper (paragraphs 4.32 – 4.44).</p>

<p><i>Loss of Green Belt:</i></p> <ul style="list-style-type: none"> No exceptional circumstances. <p>Unmet housing need does not constitute exceptional circumstances.</p> <p>Exceptional circs should be demonstrated for each site.</p> <p>Preparing a local plan is not an exceptional circumstance.</p> <p>Green Belt should be permanent.</p>	<p>Unmet housing need is unlikely to constitute very special circumstances to justify development in the Green Belt (rather than exceptional circumstances to justify altering Green Belt boundaries). The exceptional circumstances are set out in detail in the Green Belt and Countryside Topic Paper (paragraphs 4.73 – 4.75).</p>
<p><i>Additional Green Belt:</i></p> <ul style="list-style-type: none"> Should not be creating new Green Belt when losing elsewhere. <p>Does not meet NPPF criteria for new Green Belt.</p> <p>No exceptional circumstances.</p> <p>Site identified in GBCS as a potential development area should be allocated instead.</p>	<p>The exceptional circumstances that justify adding more land to the Green Belt are set out in detail in the Green Belt and Countryside Topic Paper (paragraphs 4.73 – 4.75).</p>
<p><i>Limited in-filling:</i></p> <ul style="list-style-type: none"> Should not be allowed in the Green Belt <p>Should not be allowed outside settlement boundaries.</p>	<p>Limited infilling in villages is listed in the NPPF as appropriate in the Green Belt. This has been clarified by case law which is discussed in further detail in the Green Belt and Countryside Topic Paper (paragraphs 4.19 – 4.25).</p>

<p><i>Villages:</i> <i>Ash Green:</i></p> <ul style="list-style-type: none"> • Properties along Ash Green Road form part of Ash Green village – they should not be included within the expanded Ash and Tongham urban area. <p>The new Green Belt boundary should be north of Ash Green Road to prevent Ash and Tongham merging with Ash Green.</p>	<p>The justification for the approach to Ash Green village, the proposed Ash and Tongham urban area boundary, and the new Green Belt proposed in this area is discussed in detail in the Green Belt and Countryside Topic Paper (paragraphs 4.88 – 4.105).</p>
<p><i>Chilworth:</i></p> <p>Inset boundary should not include:</p> <ul style="list-style-type: none"> • Tillingbourne Junior School playing fields (needs protecting) • Old Manor Farm - Green Belt, AGLV, conservation area, inadequate access, increase flooding. 	<p>Policy E6 provides resistance to the inappropriate loss of community facilities and playing fields.</p> <p>Various Local Plan policies prevent inappropriate development that would have an adverse impact on the AONB, landscape or character of the area (for example, ID4).</p>
<p><i>Clandon:</i></p> <ul style="list-style-type: none"> • East Clandon should not have a settlement boundary. <p>The boundary is unjustified.</p>	<p>The boundary is only a starting point for considering where limited infilling may be appropriate. It does not create additional infilling opportunities over and above what is already appropriate. The Council considers that the boundary reasonably represents the village area.</p>
<p><i>Compton:</i></p> <p>Settlement boundary should include:</p> <ul style="list-style-type: none"> • The Dykeries. 	<p>Given the size of the plot within which the Dykeries sits, and its relationship with the adjoining open countryside, it is not considered that this land forms part of the village core. This does not necessarily preclude appropriate infilling opportunities from being realised.</p>
<p><i>East and West Horsleys:</i></p> <ul style="list-style-type: none"> • Should not include identified settlement boundary south of A246. Impact on AONB. Covers 23% of village area. Will harm rural character. 	<p>The extension of a settlement boundary to include this land does not afford this land any further development opportunities over and above what is already enabled through the NPPF. Given the scale of this area and the fact it clearly forms part of the village, it is considered appropriate to identify it as such.</p>

<p><i>Horsleys Inset should not include:</i></p> <ul style="list-style-type: none"> Kingston Meadows – important recreational facility, current settlement boundary defensible (ditch). 	<p>The woodland edge is a strong and continuous defensible boundary. The woodland also serves to restrict the openness of this part of the village resulting in this land not making an important contribution to the openness of the Green Belt. Policy E6 resists against the inappropriate loss of community facilities and playing fields.</p>
<ul style="list-style-type: none"> Lollesworth – current ditch defensible, site floods. 	<p>The woodland edge is a strong and continuous defensible boundary. The woodland also serves to restrict the openness of this part of the village resulting in this land not making an important contribution to the openness of the Green Belt. There are Local Plan policies to prevent inappropriate development.</p>
<ul style="list-style-type: none"> Fangate Manor – current boundary defensible, loss of wildlife and agriculture, access shown in LAA is not suitable as Manor Close is a private road. 	<p>The tree belt to the west of Fangate Manor Farm forms a stronger and more continuous defensible boundary. The proposed boundary also creates a clearer western edge to the village with open Green Belt countryside beyond. The access will be reviewed as part of an update to the LAA.</p>
<ul style="list-style-type: none"> Area to the east of The Street currently outside the 2003 settlement boundary – consists of the Village Green and undeveloped land which contributes to openness. 	<p>The 2003 settlement boundary is not defensible. The contribution that the additional land makes to the openness of the Green Belt is limited by the tree belt.</p>
<ul style="list-style-type: none"> Boundaries identified in the GBCS as 3B, 3C, 3D, 3E, 3F and 3M are not defensible (formed of garden plot boundaries). 	<p>The boundaries follow woodland in respect of 3B, 3C, 3D, 3E and 3F and a hedgerow for 3M.</p>
<ul style="list-style-type: none"> The field called The Menage at the joining of Norrels Drive and High Park Avenue. 	<p>The woodland edge forms the first defensible boundary from the village settlement.</p>
<ul style="list-style-type: none"> The new northern boundary at Long Reach is not defensible – it is a post and rail fence with hedge and the southern edge of Ben’s Wood. 	<p>Defensible boundaries are provided by hedgerows and woodland between Long Reach and Manor Farm.</p>

<ul style="list-style-type: none"> The northern extension at Ockham Road North is not defensible - present boundary line on the southern edge of Site A40 is the hard northern edge of housing along Nightingale Avenue. 	<p>Defensible boundaries are provided by Green Lane to the north and hedgerows and woodland between Waterloo Farm and Horsley Campsite to the west.</p>
<ul style="list-style-type: none"> Playing fields north of A39 – vulnerable to development and NPPF protects playing fields. 	<p>Policy E6 resists the inappropriate loss of playing fields.</p>
<ul style="list-style-type: none"> North and east of A37 - officers report to planning application 15/P/02006 states that development would have a material and detrimental impact on the openness of the Green Belt and would conflict with at least one of the five purposes of including land within the Green Belt (to assist in safeguarding the countryside from encroachment). 	<p>The land is currently Green Belt and therefore any current or previous planning application is considered in this respect. Evidence in the GBCS indicates that the village does not make an important contribution to the openness of the Green Belt and the village is therefore being inset on the basis of defensible boundaries (The Street and the A246).</p>
<p><i>Horsleys Inset should include:</i></p> <ul style="list-style-type: none"> Land behind St Mary's Church that forms L-shape next to Rectory. Wish to improve the Church's facilities and excluding this area would impact on the delivery of this 	<p>The Green Belt boundary follows the tree belt. To ensure the boundary is easily recognisable we do not consider it appropriate to deviate from the straight line to include the small plot behind the Church.</p>
<ul style="list-style-type: none"> Boundary should be extended to include land east of Heathway (LAA site 2111): Defensible boundaries - Heathway to the west and woodland to the south and east, sustainably located, clearly separate from wider GB, suitable for development, deliverable in first 5 years. 	<p>Heathway forms a strong defensible boundary and creates a clear eastern edge to the village with open countryside beyond. To extend the Green Belt boundary here would lead to encroachment of the countryside.</p>

<p><i>Effingham Inset should not include/follow:</i></p> <ul style="list-style-type: none"> Howard of Effingham School should be excluded from Inset. In particular the playing fields which form a very important green gap between Effingham and Little Bookham. GBCS assesses this as high sensitivity Green Belt. The inset must follow a natural boundary, so therefore must be on the west side of Howard of Effingham School to keep the playing fields in the Green Belt, <p>Lower Road and the Howard of Effingham School – boundary should follow Church Lane instead,</p> <p>Inset on south side of Howard of Effingham playing fields does not following any natural feature.</p>	<p>Given the built development associated with the school and the defensible boundaries provided by the woodland to the south, Lower Road to the north and the tree belt to the east, we do not consider that this land makes an important contribution to the openness of the Green Belt. The playing fields are protected from inappropriate development under Policy E6.</p>
<ul style="list-style-type: none"> Property boundary of 69 Strathcona Avenue. 	<p>Given the scale and nature of the built development of this part of the village, we do not consider that this land makes an important contribution to the openness of the Green Belt. It follows a tree belt and fence line that is considered a recognisable and defensible boundary supported by the GBCS.</p>
<ul style="list-style-type: none"> Property boundaries at 1 Beech Close and Orchard Wells. 	<p>The boundary follows in a straight line from the tree belt and fence-line located to the south of Strathcona Avenue. This ensures it is a recognisable and defensible boundary supported by the GBCS.</p>
<ul style="list-style-type: none"> Extension of inset beyond settlement area at Grove House (A246), especially as it has no physical natural boundary on its western boundary. <p>Boundary should run from Pilgrims, The Cottage, and down all the properties on the west side of The Street, Effingham.</p>	<p>The Green Belt boundary follows the hedgerows west of the allotments which we consider is a recognisable and defensible boundary supported by the GBCS. The built extent of the land around Grove House is clearly part of the village and clearly defined from the wider open Green Belt beyond.</p>

<ul style="list-style-type: none"> The Allotments, especially as they lack permanent natural boundaries, current western delineation of village boundary, does not reflect extent of village on the ground, all owned by Council, meet Green Belt purposes; <p>The Barn: should not be included within LAA as a potential development site, unsuitable on highways grounds, barn has historic interest.</p>	<p>The hedgerows adjacent to the allotments and The Barn form an easily recognisable, straight and continuous boundary with open Green Belt to the west. The allotments are protected from inappropriate development under other policies.</p>
<ul style="list-style-type: none"> Property boundaries from Yew Tree Walk to 4 Middle Farm Close (line through the middle of a building); <p>Agricultural land/buildings at Home Farm.</p>	<p>The Green Belt boundary follows the hedgerows west of Home Farm which we consider is a recognisable and defensible boundary supported by the GBCS.</p>
<ul style="list-style-type: none"> Property boundaries at Wychem, Orestan Lane. 	<p>The Green Belt boundary follows the tree-belt located to the south of Orestan Lane which is a recognisable and defensible boundary supported by the GBCS.</p>
<ul style="list-style-type: none"> At the back of Middle Farm Place the inset should follow the road edge in front of 37, 39 and 41 Middle Farm Place and then follows the back gardens of Wychem, Lavender Hill and Woodstock on Orestan Lane. This removes Middle Farm Place field from the inset which is a public amenity space. This amended inset boundary provides a clear, defensible and permanent boundary. 	<p>To ensure the boundary is easily recognisable we do not consider it appropriate to deviate from the straight line as it continues along the rear of the properties south of Middle Farm Place. We consider the tree belt south of Orestan Lane forms an easily recognisable and defensible boundary, supported by the GBCS. Open space is protected from inappropriate development under other policies.</p>
<ul style="list-style-type: none"> Property boundaries at Moonshine, Effingham Common Road, and all along Lower Road (Old Village Hall, and Sir Douglas Haig cut by inset boundary). Inset should run along south side of Lower Road. 	<p>Given the scale and nature of the built development of this part of the village, we do not consider that this land makes an important contribution to the openness of the Green Belt. It follows a recognisable and defensible boundary supported by the GBCS.</p>

<ul style="list-style-type: none"> Property boundaries: All properties in Barnes Wallis Close should be included in the Inset. <p>The inset boundary proposed in the LP does not follow a clearly defined boundary. It goes straight through the centre of the Barnes Wallis Close development where there are no defined or permanent boundaries.</p>	<p>The inset boundary has been amended to follow the tree-belt/hedgerows along the south and east of the properties in Barnes Wallis Close.</p>
<p><i>Effingham Inset boundary should include:</i></p> <ul style="list-style-type: none"> Manor House Lane – part of village, defined by defensible features, recommended by GBCS 	<p>Whilst recommended in the GBCS, it also found, in Stage 3, that there are visual connections to open land within the Green Belt located across King George V playing fields. For this reason we consider that it remains appropriate to exclude this land from the inset.</p>
<ul style="list-style-type: none"> All land that could be considered to form part of the village 	<p>Limited infilling is appropriate within villages and includes all land that is considered to be part of the village, as a matter of fact on the ground. This same test is not applicable to insetting which only applies to those parts of the village that do not make an important contribution to the openness of the Green Belt.</p>
<ul style="list-style-type: none"> Land north of Lower Road: forms part of the village comprising St Lawrence School, a former convent, bordered by development. Includes land called Lyon’s Field under which limited infilling would be permitted under green belt policy. Land is suitable and available. 	<p>Without the allocation of Effingham Lodge Farm, it is not considered appropriate to extent the inset boundary north of Lower Road. As set out in the GBCS, there are apparent visual connections here to open land within the wider Green Belt.</p>
<p><i>Gomshall:</i></p> <p>Settlement boundary should not include car park at Our Lady of the Angels RC Church:</p> <ul style="list-style-type: none"> It makes the site vulnerable to development. Site not suitable for infill. Will change the character of the area if developed. 	<p>The NPPF states that limited infilling is appropriate within villages. This includes all land that is considered to be part of the village, as a matter of fact on the ground. We consider this land does form part of the village. A planning application would still be required to demonstrate that it meets the test of limited infilling and conforms to other policies such as character and design.</p>

<p><i>Normandy and Flexford Inset boundary should include:</i></p> <ul style="list-style-type: none"> Land at Westholme, Green Lane East – previously included within the inset, land should have been included as part of the perceived village area (all other properties accessed off Green Lane East are included) and categorised as medium density development, site surrounded by coniferous trees to north and hedgerow to the west, not visible from wider Green Belt, surrounded by development. 	<p>The inset area has been increased to include this plot based on the tree-belt to the north.</p>
<p><i>Send Inset boundary should not include:</i></p> <ul style="list-style-type: none"> St Bede’s Junior School – would lead to this land being developed and is contrary to recent planning permission which required land to be returned to greenfield Playing fields must be protected. 	<p>The Green Belt boundary follows hedgerows and a tree-belt which is a recognisable and defensible boundary supported by the GBCS. The playing fields are protected from inappropriate development under other policies.</p>
<ul style="list-style-type: none"> Land to the right of Cartbridge by the River Wey Navigation up to the new boundary fence with Vision Engineering – contains woodland and wildlife. 	<p>Visual connections to the wider Green Belt are restricted by woodland to the north of Send Road and the River Wey navigation is an easily recognisable and defensible boundary supported by the GBCS.</p>
<ul style="list-style-type: none"> Land left of Cartbridge going up to the old depot on the Wey Navigation. Land behind Heath Drive. 	<p>Visual connections to the wider Green Belt are restricted by woodland to the north of Send Road and the River Wey navigation is an easily recognisable and defensible boundary supported by the GBCS.</p>
<ul style="list-style-type: none"> Land behind Winds Ridge – current footpath defensible 	<p>The Green Belt boundary follows a tree-belt which is a recognisable and defensible boundary supported by the GBCS.</p>
<ul style="list-style-type: none"> River Wey corridor – contrary to Policy ID4 which seeks to protect its important characteristics. 	<p>Policies regarding the River Wey Navigation will continue to apply regardless of the Green Belt designation.</p>

<p><i>Send Marsh Inset boundary should include:</i></p> <ul style="list-style-type: none"> Should include entire site north of Send Marsh Road as the current boundary identified in the GBCS (ref 3M) is listed as a 'fence line and tree-belt located to the west of Danesfield and to the north of Send Barns Road' however this does not exist. The site is bordered on three sides by established housing and defensible boundaries including a footpath to the west (footpath number 46) and a second footpath to the north of the site (footpath number 45). 	<p>The Green Belt boundary has been amended to follow the access road off Polesden Lane, the tree belt, and the tree-belt and fence-line south and west of Danesfield.</p>
<ul style="list-style-type: none"> The site at Polesden Lane does not contribute towards the openness of the Green Belt and should be included within the inset area. An assessment of the contribution a land parcel makes to meeting the Green Belt purposes should firstly be carried out. Secondly and as necessary, subsequent consideration should be given to where any revised boundary should be located. The boundary assessment should in no way be confused with assessing the contribution a parcel of land makes to the Green Belt purposes. 	<p>This site is identified as a Potential Development Area (PDA) within Volume III of the GBCS. This volume sought to identify sites that could be developed around villages without harming the main purposes of the Green Belt. These sites have been considered for their ability to meet our growth requirements under the exceptional circumstances test required to amend of Green Belt boundaries. The justification for the spatial strategy and site allocations is set out in more detail in the Housing Delivery Topic Paper.</p> <p>Volume IV of the GBCS sought to respond to paragraph 86 of the NPPF which requires that only those villages whose open character makes an important contribution to the openness of the Green Belt should remain washed over by the Green Belt. This assessment considered the degree of openness within each village (urban form, density and extent of developed land), the presence of potential Green Belt boundaries and therefore the suitability of each village to be inset. Send Marsh is recommended to be inset. However, the boundary identified was not considered defensible (see above comment) and was therefore amended to follow the developed edge of the village. The Council continues to consider that this remains an appropriate inset boundary for the village.</p>

<p><i>Shalford Inset boundary should not include:</i></p> <ul style="list-style-type: none"> Land behind village hall – contributes towards open character, elevated land and visible, development will harm the environment, increase traffic along an unsuitable road. Land is AGLV and the open space designation doesn't necessarily protect it. There is a footpath running across the access. It contradicts the LCA. The current boundary is defensible. Land was donated to the parish. 	<p>The previous boundary was not a continuous defensible boundary (for example it cut between two tennis courts). This is not an appropriate Green Belt boundary. In order to include land within the Green Belt, the NPPF states that the land should contribute towards the openness of the Green Belt, rather than the village. Other Local Plan policies will prevent inappropriate development due to impact on landscape, character or amenity.</p>
<ul style="list-style-type: none"> The village green. 	<p>The Green Belt boundary follows the A281 and A248 which is a recognisable and defensible boundary supported by the GBCS.</p>
<ul style="list-style-type: none"> Common land abutting the Horsham Road together with a triangle of land opposite Snooty's Groceries, and a triangle of land in Chinthurst Lane, opposite Granary Cottage – SNCI and common land so not developable. 	<p>The Green Belt boundary follows an established pathway along the building frontage on the Kings Road to the south of Shalford Common which is a recognisable and defensible boundary supported by the GBCS. Other Local Plan policies will prevent inappropriate development due to other designations.</p>
<ul style="list-style-type: none"> Triangle of land to the east behind the houses on Kings Road in Christmas Hill. This is totally land locked, accessible only from adjoining property, a footpath or Common Land. It is also elevated. Boundary should follow the ridge behind Findon Lodge, 1 to 10 Christmas Hill and the 6 premises on Milkwood and the ancient path that runs from Chinthurst Hill to Shalford Common to the west of these (either to the east or the west of Findon Lodge's garden which has been extended over time from the 2003 settlement boundary line). 	<p>The alternative boundary is not considered easily recognisable and defensible as the mature hedgerow which is recommended in the GBCS. In order to include land within the Green Belt, the NPPF states that the land should contribute towards the openness of the Green Belt, rather than the village. Other Local Plan policies will prevent inappropriate development due to impact on landscape, character or amenity.</p>
<p><i>Wood Street Village:</i></p> <ul style="list-style-type: none"> The proposed inset is unduly restrictive as it excludes the Green, Conservation Area and potential development areas. It should be extended to include these. 	<p>The purpose of insetting is not to enable development – rather it is to exclude those parts of the village that do not make an important contribution to the openness of the Green Belt.</p>

<p><i>Wood Street Village Inset boundary should not include:</i></p> <ul style="list-style-type: none"> • Light industrial buildings – will lead to loss of local employment. 	<p>Other Local Plan Policies resist the inappropriate loss of employment land.</p>
<ul style="list-style-type: none"> • North of Oak Hill – will lead to garden development. 	<p>The Green Belt boundary follows a tree-belt which is a recognisable and defensible boundary supported by the GBCS. Other Local Plan policies prevent inappropriate housing development.</p>
<ul style="list-style-type: none"> • Common land – cannot be built on in any case. 	<p>The purpose of inseting is not to enable development. Rather, it is to exclude those parts of the village that do not make an important contribution to the openness of the Green Belt.</p>
<p><i>Major previously developed sites:</i> <i>HM Prison:</i></p> <ul style="list-style-type: none"> • Support inseting however it should not include The Spinney – it has an open and undeveloped character. 	<p>The Spinney is considered to form part of the major previously developed site. The site does not have a visible open character and there are recognisable and defensible boundaries. The Spinney in particular plays a limited role in its contribution to the openness of the Green Belt given it is surrounded by woodland and the prison.</p>
<p><i>Send Business Park:</i></p> <ul style="list-style-type: none"> • Inseting not justified and would harm openness of the Green Belt. <p>Not suitable for additional development – River Wey, narrow road, flooding.</p>	<p>The Council considers that the specialist nature of the site and the benefits that would be realised through inseting it to enable future expansion, as detailed in the Green Belt and Countryside topic paper, constitute the exceptional circumstances to amend Green Belt boundaries.</p>

P3: Countryside

Main Issue	Guildford Borough Council Response
<i>Representations on Specific Issues</i>	
<ul style="list-style-type: none"> Green Belt should not be created if being lost elsewhere. 	<p>Green Belt boundaries may only be altered in exceptional circumstances. There are exceptional circumstances that justify removing land from the Green Belt and exceptional circumstances to justify adding land to the Green Belt. This is set out in the Green Belt and Countryside Topic Paper.</p>
<ul style="list-style-type: none"> Policy gives greater protection to countryside (and preventing coalescence) than land that is currently Green Belt. 	<p>The Spatial Strategy has sought to protect identities of separate settlements by directing development away from highly sensitive Green Belt. The countryside that remains predominantly consists of the Blackwater Valley. This area of countryside forms a narrow corridor, which plays a very important role in preventing Ash and Tongham from merging with Aldershot.</p>

P4: Flood risk

Main Issue	Guildford Borough Council Response
<p>Representations from Prescribed Bodies and Selected Stakeholders</p>	
<p>Spelthorne Borough Council</p> <ul style="list-style-type: none"> Spelthorne BC would be concerned if a reduction of floodplain storage in Guildford Borough’s upper catchment would result in greater flood water levels entering the Thames and affecting Spelthorne. Flood risk capacity should be maintained or ideally bettered, as any loss in capacity could lead to increased flows downstream. 	<p>Policy P4 addresses this issue at point (2) (c). This states that development proposals in areas at risk of flooding must be accompanied by a site-specific flood risk assessment, which demonstrates that the proposed development will not increase flood risk elsewhere, and where possible, will reduce flood risk overall. This would include potential flood risk to areas downstream of the development, which could otherwise be affected by a loss of upstream storage capacity. Point (2) (d) also deals with the issue by stating that schemes in these areas must incorporate appropriate flood resistance and resilience measures.</p>
<p>Environment Agency</p> <ul style="list-style-type: none"> On page 5 of the Level 1 SFRA it is made clear with regards to development within the functional floodplain that “<i>there should be no increase in development vulnerability or intensification in use</i>”. It is noted that this is not reflected in Policy P4. <p>In order to overcome this point of soundness Policy P4 (3) should be updated to reflect the SFRA: “Development proposals in the ‘developed’ flood zone 3b will also only be approved where the footprint of the proposed building(s) is not greater than that of the existing building(s) <u>and there will be no increase in development vulnerability or intensification in use.</u> Proposals within these areas should facilitate greater floodwater storage.</p>	<p>Additional wording in relation to development vulnerability could help to clarify the intended use of Policy P4 and be in line with the NPPF and NPPG. However, reference could not be found in national planning guidance concerning development proposals that would result in an intensification of use being inappropriate within flood zone 3b.</p> <p>The Level 1 SFRA does state [on page 5 of the Summary Report (January 2016), and page 14 of the Decision Support Document (July 2016)] that there should be no intensification in use on developed sites in the Functional Floodplain (flood zone 3b). However, this statement appears to be incorrect, as it does not seem to reflect national guidance.</p>

	<p>In addition, including a reference to development vulnerability in the Policy would adequately cover this issue. If a developer were to submit a proposal for higher density redevelopment in flood zone 3b that does not exceed the existing building's footprint, their planning application would still need to demonstrate that the proposal would not increase flood risk vulnerability on the site, or surrounding area. Therefore, a minor change has been recommended to include the first part of the respondent's suggested underlined wording to Policy P4, but not to refer to intensification in use.</p>
<ul style="list-style-type: none"> • Welcome the inclusion of a majority of the advice we provided in July 2016, in particular the specific mention of the flood risks associated with climate change within Policy P4 (2) (c). <p>(Paragraph 4.3.36) For the sake of clarity we recommend adding the date of the Flood and Water Management Act (2010). In addition, specific mention of Thames Water as a Risk Management Authority could be made, as they have a significant role in relation to managing flood risk from sewers.</p> <p>(Paragraph 4.3.42) We welcome the recognition of sensitive groundwater receptors within the Borough. We recommend that reference is made to the most up-to-date version of the Environment Agency's groundwater protection position statements which can be found at: https://www.gov.uk/government/publications/groundwater-protection-position-statements</p>	<p>These changes have been added to the minor modifications.</p>

Site allocations and groundwater protection:

- Sites within the inner source protection zone (SPZ1) often have specific requirements to protect groundwater. We recommend that the following groundwater issues are added to the list of key considerations for the preferred sites listed in Appendix A to this letter.

Appendix A – Sites with groundwater protection concerns

Site Key Consideration

A1 Principal Aquifer

A3 Northern tip of site in SPZ1 , Principal Aquifer

A5 SPZ1

A6 SPZ1

A7 SPZ1

A8 SPZ1

A9 SPZ1

A11 SPZ1

A12 SPZ1

A13 SPZ1

A14 SPZ1

A15 Partly in SPZ1

A18 SPZ1

A23 The site is a proposed burial ground, special consideration is required regarding the depth to groundwater.

Refer to the appropriate section of the Groundwater protection position statements guidance *

A24 SPZ1 and historic landfill on part of site.

A26 Principal Aquifer

A37 Principal Aquifer

These changes have been added to the minor modifications.

Draft

Representations on Specific Issues	
<p><i>Reference to Sites and Site Areas:</i></p> <ul style="list-style-type: none"> • Flooding on Portsmouth Rd and Send Marsh road was particularly bad in 2013/14. Large parts of sites included in plan were affected. 	<p>Policy P4 requires development proposals in areas at risk of flooding to demonstrate that they will not increase flood risk on site or elsewhere.</p>
<ul style="list-style-type: none"> • Large areas of Send and Ripley are in or adjacent to areas of flood risk – building on greenfield here will increase water run-off and flooding. 	<p>The site allocations included within the Local Plan have been informed by the Council’s Strategic Flood Risk Assessment. Development proposals in areas of flood risk will be required to demonstrate that they will not increase flood risk elsewhere (and where possible will produce betterment).</p>
<ul style="list-style-type: none"> • Slyfield regeneration project partly on flood zone 3b – object to this. 	<p>Policy A24 imposes a requirement on the developer of the site to achieve a reduction in flood risk across the site, and beyond it, and to have regard to the Level 2 SFRA. No comment from the Environment Agency in relation to flooding concerns (see also separate response to comment on site A24).</p>
<ul style="list-style-type: none"> • Improvements will potentially put added stress on downstream areas, which would have to be taken into account for any development in the area designated as A46 to ensure that risks are not increased during storms or persistent heavy rainfall. 	<p>Policy P4 requires development proposals in areas at risk of flooding to be supported by a site-specific flood risk assessment that demonstrates the development will be safe without increasing flood risk elsewhere. All development proposals are required to have regard to appropriate mitigation measures identified in the Guildford Surface Water Management Plan or Ash Surface Water Study.</p> <p>Government guidance emphasises that flood risk assessments should identify plans for managing surface water run-off and ensuring that there is no increase in run-off.</p>
<ul style="list-style-type: none"> • The sewage treatment plant at Slyfield is still years away from being replaced. Additional sewage treatment capacity is needed. 	<p>Appendix C of the Proposed Submission Local Plan (Infrastructure Delivery Schedule) indicates that the replacement sewage treatment facility is likely to be delivered by 2021.</p>

<ul style="list-style-type: none"> There are already sewerage network and drainage problems in the borough (in places such as Ockham Road North, West Horsley, and Normandy). Capacity issues will increase with more housing in the villages. 	<p>The Infrastructure Delivery Schedule highlights the wastewater infrastructure projects which are/may be required to support the proposed development in the Plan. Guildford Borough Council will continue to work closely with Thames Water to monitor and identify the need for further wastewater infrastructure provision in the borough.</p>
<ul style="list-style-type: none"> Though requested by the Worplesdon Flood Forum, Wood Street Village has not been included within the Guildford Surface Water Management Plan 2014. Development at Blackwell Farm will increase the risk of surface water flooding at Wood Street Village, Fairlands, the Research Park and the Park Barn neighbourhood of Guildford as per the Surface Water Flood Risk Assessment produced by JBA Consulting on behalf of Worplesdon Parish Council July 2017. 	<p>The allocation policy for Blackwell Farm (A26) already requires that flooding issues are taken into account for that site. This wording contains sufficient detail for a strategic Local Plan policy and a clear expectation that developers of the site would undertake further research to support their proposal(s). Surface water flooding issues for Wood Street Village will be incorporated, if necessary, in the next update of the Surface Water Management Plan.</p>
<ul style="list-style-type: none"> Objection to all development in areas at risk of flooding. 	<p>Policy P4 emphasises that the Council will apply a sequential approach to ensure that development is located in areas at lowest risk of flooding first. However, the Council's Strategic Flood Risk Assessment has highlighted that there is insufficient space in the borough to accommodate all of our development needs within flood zone 1 (lowest area of flood risk). Development proposed in areas of higher risk of flooding will be required to pass a sequential test and an exception test (where necessary), in line with the NPPF. The Council will also refer to the NPPG's land use vulnerability classification table when determining applications in flood zones 2 and 3 and require proposals to provide appropriate flood risk mitigation, including safe access and egress.</p>

<ul style="list-style-type: none"> Plan does not take adequate account of flood risk. 	<p>Policy P4 states that all development will be required to demonstrate that it will not result in an increase in surface water run-off. Development in areas at risk of flooding will be permitted provided that the vulnerability of the use is appropriate to the level of flood risk, a site-specific flood risk assessment demonstrates that the development will be safe (including access and egress), without increasing flood risk elsewhere, and a series of mitigation measures are put in place.</p>
<ul style="list-style-type: none"> Much of development planned in low-lying areas. 	<p>The plan seeks to guide development towards areas of lowest flood risk first. However, the Council's Level 1 Strategic Flood Risk Assessment concludes that there is insufficient capacity in flood zone 1 to accommodate all of the borough's development needs. A number of allocated sites are therefore partly or fully located within flood zone 2 or 3. Development proposals in such locations will only be granted planning permission where they meet the mitigation measures set out in Policy P4.</p>
<ul style="list-style-type: none"> Council have overlooked the effect of the River Mole on local flooding. 	<p>Flood risk has been assessed utilising Environment Agency flood risk maps for the area and/or detailed hydraulic modelling.</p>
<ul style="list-style-type: none"> Given the policy, why are areas at risk of flooding included? 	<p>The Plan seeks to guide development towards areas of lowest flood risk first. However, the Council's Level 1 Strategic Flood Risk Assessment concludes that there is insufficient capacity in flood zone 1 to accommodate all of the borough's development needs. A number of allocated sites are therefore partly or fully located within flood zone 2 or 3. Development proposals in such locations will only be granted planning permission where they meet the mitigation measures set out in Policy P4.</p>

<ul style="list-style-type: none"> The Plan has been drawn on the basis that it is more important to deliver the full OAN than to ensure flood risk is minimised. This is not responsible plan-making. 	<p>Policy P4 emphasises that development proposals in areas of flood risk will only be permitted where the proposed land-use's vulnerability classification is appropriate to the flood zone (as defined in the NPPG).</p> <p>All development in areas of flood risk will be required to meet a series of mitigation measures (as outlined in Policy P4) to ensure that the development is safe and does not increase flood risk elsewhere.</p>
<ul style="list-style-type: none"> NPPF states that Local Plans should take account of climate change over the longer term and new development should be planned to avoid vulnerability to the range of impacts arising from climate change. 	<p>Reference to climate change added to policy and adjoining text.</p>
<ul style="list-style-type: none"> Draft IDP identifies a surface water flooding hotspot in West Horsley. Without a drainage strategy to determine the exact impact on the infrastructure and the significance of the infrastructure required, the deliverability of the proposed housing is unclear. 	<p>Guildford Borough Council have, and will continue to, liaised closely with Thames Water regarding the housing growth identified in the Local Plan and the implications for future wastewater infrastructure provision.</p>
<ul style="list-style-type: none"> Policy should include: <ul style="list-style-type: none"> Repairs to structures already within the Zone 3b Flood Plain will be permitted for maintenance. Should replacement or rebuilding of the structure be required, every effort should be made to remove it from the Zone 3b flood plain. 	<p>Replacement of a building in flood zone 3b would require planning permission, at which point the planning application would need to pass an exception test for the redevelopment to gain approval. See NPPG paragraph: 036 Reference ID: 7-036-20140306.</p>
<ul style="list-style-type: none"> Existing drainage and foul water mains/ infrastructure cannot cope at present. 	<p>Development in areas of risk at flooding will be required to provide site drainage systems that are designed to take account of storm events. All development proposals will be required to demonstrate that they do not increase surface water run-off.</p>

<ul style="list-style-type: none"> • New major development would require complete replacement of foul water drainage; this would cause disruption to roads, harm wildlife and surface water flooding. 	<p>The infrastructure schedule included as Appendix C of the Plan indicates that the requirement for new foul water drainage will need to be assessed by the developers of the strategic sites. Should there be a need for infrastructure upgrades, the costs will be borne by the developer.</p> <p>The impact of providing such additional infrastructure will need to be considered and mitigated through a planning application/the development management process.</p>
<ul style="list-style-type: none"> • Due account should be taken of increased potential flooding risks, taking account of predicted increases in extreme weather arising from continued global warming. 	<p>Climate change issues have been incorporated into the policy and the reasoned justification.</p>
<ul style="list-style-type: none"> • The flood risk maps in the plan are out of date, they differ from those published by the EA and in some cases are not supported by flood data available from the EA. 	<p>The Strategic Flood Risk Assessment relies on the EA rivers and sea flood risk maps or more detailed hydraulic modelling.</p>
<ul style="list-style-type: none"> • By allowing development in areas at risk of flooding, the local plan is contradicting the precautionary principle in the NPPF: to direct development to areas at lowest risk of flooding. 	<p>The Local Plan attempts to guide development to areas at lowest risk of flooding first. However, the Level 1 SFRA concludes that there is insufficient land available in flood zone 1 to accommodate the borough's development needs. In accordance with the NPPF, development proposals in flood zones 2 and 3 that pass the sequential and exception test (where appropriate) will therefore be approved, if the vulnerability of the use is appropriate to the site's flood zone.</p>

<ul style="list-style-type: none"> • Objection to changes in Policy P4 Flood risk and water source protection zones – it is a misrepresentation to state that development on existing hardstanding (e.g. Woodbridge Meadows Industrial Estate and the Arriva bus depot, on the River Wey bank) creates additional risk of flooding. <p>This policy amendment unnecessarily removes these valuable brownfield sites from the scope of the plan. It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside. This policy should not be used as a convenient excuse not to build on the extensive area of brownfield sites between the station and Ladymead. Any new development in this area could easily be built on stilts with flood resistant ground floor parking in areas that are identified as high flood risk.</p>	<p>Retention of existing areas of hardstanding within the functional floodplain is preferable to an increase in the footprint of buildings on this land from a flood risk perspective. This is because surface water can drain from the hardstanding to a soakaway, rather than running off to outlying areas (paragraph 100 of the NPPF recommends avoiding an increase in flood risk elsewhere). Furthermore, where hardstanding has been constructed of permeable or porous materials, it allows infiltration of surface water. Redeveloping buildings on hardstanding above ground floor level would improve flood risk compared to developing the same building footprint at ground floor level, but would lead to increased surface water runoff and potentially reduced permeability and infiltration compared to the existing hardstanding.</p> <p>Recommend clarifying ‘areas of risk of flooding’ in criterion (2) by amending wording (as a minor change) to ‘Development in areas at <u>medium or high</u> risk of flooding’. These are flood zones 2 and 3. Zone 1 is low, but not zero risk. For any new development in flood zone 3b to be approved, it will remain necessary for the other criteria specified in this policy to be met. In particular it will remain necessary for the sequential and, where required, exception tests to be passed and for criteria (c) to be satisfied in relation to the development not increasing flood risk elsewhere and, where possible, reducing flood risk overall.</p>
<ul style="list-style-type: none"> • Support for requirement (5) in this policy that "<i>all development proposals are required to demonstrate that land drainage will be adequate</i>". However, GBC has failed to put this policy into practice in forming its Plan and does not demonstrate exactly how it will prevent the increased impermeable surface water run-off from the Blackwell Farm development exacerbating flooding at Wood Street Village, Fairlands and Whitmoor Common Special Protection Area (SPA). <p>In particular, GBC has not addressed the likely requirement</p>	<p>Detailed information concerning the specific cases identified is contained within the key evidence that supports the Local Plan and is referred to within the Plan. It would be inappropriate to repeat this information here.</p> <p>However, it should be noted that, in areas where historic flooding information and predictive data indicate that the area is at high risk of surface water flooding, Halcrow Ltd carried out detailed flood risk assessments for the Surface Water Management Plan (2014). The SWMP provides recommendations and an action plan for known surface water flooding hotspots. Ordinary watercourses, including</p>

<p>(and cost) for two reservoirs to control flow – one of which (due to topography) would ideally be located in the north-east corner of the site, which is currently allocated for the Research Park extension.</p> <p>The Whitmoor Common SPA does require flooding at times in order to maintain its wetland habitat, and so damming streams that flow from Blackwell Farm would not be a straightforward solution. The Plan does not explain how the developers of Blackwell Farm site would achieve the balance between damming up streams to prevent surface water run-off flooding residential areas and preserving the wetland habitat of the SPA.</p>	<p>smaller streams, are the responsibility of local authorities but any plan for reducing flood risk from them lies outside the remit of Local Plan policies. The SFRA recommends further actions to reduce flood risk at identified hotspots across the borough.</p> <p>If an applicant proposes to develop on the Blackwell Farm site then the Council would expect them to provide information on how they intend to resolve any potential flood risk issues that the development may otherwise exacerbate, whilst also preserving habitats. These issues have been identified in the requirements for site allocation Policy A26.</p>
<ul style="list-style-type: none"> Urban development on existing hardstanding/previously developed land would not create additional flood risk, especially where there is scope for flood resistance measures/ priority should be building on brownfield. 	<p>Policy P4 states that development proposals in the ‘developed’ flood zone 3b will only be approved if the footprint of the proposed building(s) is not greater than that of the existing building(s). Retention of existing areas of hardstanding within the functional floodplain is preferable to an increase in the footprint of buildings on this land from a flood risk perspective. This is because surface water can drain from the hardstanding to a soakaway, rather than running off to outlying areas (paragraph 100 of the NPPF recommends avoiding an increase in flood risk elsewhere). Furthermore, where hardstanding has been constructed of permeable or porous materials, it allows infiltration of surface water. Redevelopment in cases such as this would reduce a site’s overall drainage capacity and thereby increase flood risk on the site.</p>

<ul style="list-style-type: none"> Do not support building on floodplain but intelligent architecture can overcome problem by building above or over the flood plain. <p>The changes essentially preclude building in these brownfield areas. Suitable designs can protect against flood risk and free up land for suitable development.</p>	<p>Policy P4 states that schemes in areas at risk of flooding will be required to incorporate appropriate flood protection, flood resilience and resistance measures. The use of Sustainable Drainage Systems is also encouraged and proposals will be required to demonstrate that they will not result in a net increase in surface water run-off. However, the Council will also be guided by land use vulnerability classification and its appropriateness to each flood zone as outlined within National Planning Practice Guidance.</p> <p>Development above ground level on floodplains would lead to increased surface water runoff and reduced water permeability and such proposals would be unlikely to receive the support of the Environment Agency.</p>
<ul style="list-style-type: none"> Whilst the main thrust of Policy P4 complies with guidance on sequential and exception tests, the requirement of development proposals to not be greater than the footprint of the existing building fundamentally undermines the potential of town centre sites to deliver significant levels of housing or other uses. <p>The GVG Masterplan considers an innovative solution to the protection of future residents from flood risk by raising the street level above current levels. It places car parking and other compatible uses on the lower ground floor or undercroft, while residential units are placed on upper floors with dry access provided in the event of a flood.</p>	<p>It would not be safe to allow housing development in the developed Flood Zone 3 that exceeds the footprint of the existing development. Developing above the existing ground level would only serve to protect the new buildings and occupants from flooding/flood damage. It would still reduce the amount of land available for infiltration and thereby increase the risk of surface water flooding elsewhere. This is contrary to NPPF guidance and such proposals would be highly unlikely to receive the support of the Environment Agency.</p>
<ul style="list-style-type: none"> Policy on the developed Zone 3b floodplain should, where possible, encourage the layout of development within a site to be changed to reduce the footprint within the functional flood zone and to make more space for water. Currently, the policy reinforces existing layout (albeit with reference to an assessment). 	<p>Paragraph 3 of Policy P4 does encourage developers to reduce the footprint of the existing development and thereby increase space for water storage/ground infiltration by requiring that the proposed development should 'facilitate greater floodwater storage'.</p>

<ul style="list-style-type: none"> • Building on Greenfield land will increase flood risk. <p>Further housing development will increase the risk of flooding to people's homes.</p> <p>More building of hard standing will increase flooding (destruction of natural drainage, more surface water flooding).</p>	<p>Policy P4 states that development in locations at risk of flooding must demonstrate through the planning application process how flood risk will not be increased either on the site or elsewhere as a result of the proposed development. Development in these areas must also incorporate suitable flood protection, resilience and resistance measures and site drainage systems.</p> <p>All developments should incorporate Sustainable Drainage Systems (SuDS) where appropriate to manage surface water drainage. Applicants will also need to demonstrate that their proposals will not increase surface water run-off and that they have regard to appropriate mitigation measures identified in the Guildford Surface Water Management Plan or Ash Surface Water Study.</p>
<ul style="list-style-type: none"> • GBC has been advised by Thames Water that the current wastewater network is unlikely to be able to support the amount of development proposed for West Horsley. 	<p>Guildford Borough Council will continue to liaise closely with Thames Water regarding the housing growth identified in the Local Plan and the implications for future wastewater infrastructure provision.</p>
<ul style="list-style-type: none"> • The plan acknowledges that there are ground water supply issues, yet proposes development in the green belt without consideration for sustainable supplies of fresh water. 	<p>The Council will continue to work closely with infrastructure providers to assess and mitigate the impact of planned housing growth on water supply.</p>
<ul style="list-style-type: none"> • Thames Water do not appear to have any plans in place. Water supply concerns in the light of climate change. 	<p>The Infrastructure Schedule (Appendix C) sets out the potential wastewater infrastructure upgrades that will support the delivery of the Local Plan. The Council will continue to work closely with Thames Water to ensure that development is supported by appropriate infrastructure upgrades.</p>

<ul style="list-style-type: none"> Many of the major housing developments in the borough could be affected by water supply problems. 	<p>The Council will continue to work closely with water supply providers to understand and mitigate the impact of proposed housing growth on water supply.</p> <p>To help protect local water supply, Policy P4 emphasises that development within Groundwater Source Protection Zones and Principal Aquifers will only be permitted provided that it has no adverse impact on the quality of the groundwater resource and it does not put at risk the ability to maintain a public water supply.</p>
<ul style="list-style-type: none"> Policy P4 does not reflect some of the conclusions within the evidence submitted in the Strategic Flood Risk Assessment (SFRA) Level 1. Therefore, this policy cannot be justified by the evidence base or be consistent with the National Planning Policy Framework (NPPF) and associated Planning Practice Guidance (PPG). 	<p>The respondent has been unclear as to where the wording of the Policy does not reflect the conclusions of the SFRA Level 1.</p> <p>The Policy does reflect the conclusions of the SFRA Level 1 and the policy is therefore justified by the evidence base, as well as consistent with national policy and guidance.</p>
<ul style="list-style-type: none"> The Council should offer clearer advice in terms of how it responds to the necessary allowance for climate change. The current wording, which indicates that an 'appropriate allowance' should be made, is not an appropriate policy mechanism to give this certainty of delivery. The Council should instead offer greater certainty about what is required, justified by evidence and policy guidance. 	<p>It is the responsibility of applicants to provide evidence that this policy criterion will be met by their proposal(s). The Council has published evidence and guidance in its SFRA and Flood Risk Topic Paper to assist them with this.</p>
<ul style="list-style-type: none"> (Paragraph 4.3.39) There should be no change to flow routes; the Council's amendment has a fundamentally different meaning from the Environment Agency response. Whilst the EA states "<i>All other land surrounding this important flow routes [sic] is important and should be retained</i>", whereas the Council refers to "changes to flow routes". 	<p>Development of land in zone 3b functional floodplain may be permissible for water compatible development, in accordance with national policy on flood risk. In these circumstances, the proposal would be subject to an exception test and a developer would need to submit a flood risk assessment, which would show how their proposal would retain these flow routes and, if there is a need to divert them, how the proposal would ensure that they continue to operate effectively.</p>

<ul style="list-style-type: none"> • (Paragraph 4.3.37) Flooding from rivers is not necessarily linked to climate change but can be due to poor management and drainage. It should be noted that flooding from surface water is also a Main Issue in parts of the borough and that due to fear of blight, areas subject to manageable damage from flooding often do not report this as it affects insurance and ability to sell. 	<p>The Council agrees with the points raised. Therefore, a minor change to the sentence wording is recommended; to clarify that climate change is liable to increase flooding incidents, rather than being the sole cause of them.</p>
<ul style="list-style-type: none"> • Evidence should include professional independent assessments for specific sites. This is particularly relevant for Worplesdon and parts of Ash as well as the town centre and Shalford. Flood zones are based on previous events without development. Large scale development on porous ground will naturally increase flood risk as any natural soak-away is removed. A professional independent opinion would be needed to verify the real risk. 	<p>Many of the key evidence documents on flooding were independently prepared by professional consultants and do consider flood risk for specific parts of the borough. Where a known risk has been identified by either the presence of a higher-level flood zone or the presence of historical flooding hotspots then further site-level work would need to be undertaken as part of a planning application. This requirement is referred to under the requirements of site allocation policies.</p>
<p><i>Suggested Changes to Wording:</i></p> <ul style="list-style-type: none"> • Add <i>'All other land surrounding this is important flow routes and should be retained'</i> at the end of paragraph 4.3.39. 	<p>Suitable additions incorporated to paragraph wording.</p>
<ul style="list-style-type: none"> • Add <i>'Site drainage systems are appropriately designed taking into account of storm events up to 1 in 100 year chance of flooding with an appropriate allowance for climate change'</i> to details regarding development in areas at risk of flooding. 	<p>Reference to climate change added to Policy and to adjoining text in paragraph 4.3.43.</p>
<ul style="list-style-type: none"> • To be consistent with the NPPF, use the following wording in regards to groundwater source protection: <i>"Development within Groundwater Source Protection Zones and Principal Aquifers will only be permitted provided that it has no adverse impact on the quality of the groundwater resource and does not put at risk the ability to maintain a public water supply"</i>. 	<p>Change made to part (6) of the policy.</p>

Policy P5: Thames Basin Heath Special Protection Areas

Main Issue	Guildford Borough Council Response
<p><i>Representations from Prescribed Bodies and Selected Stakeholders</i></p>	
<p>Natural England</p> <ul style="list-style-type: none"> The only element missing from this policy is reference to how the financial contributions will be secured by Guildford Borough Council. Would the Community Infrastructure Levy be used? We feel it is worth referencing this matter either within Policy P5 supporting text, or within the HRA which accompanies this document. 	<p>This information has been included in the HRA.</p>
<ul style="list-style-type: none"> Advise that under point (3) a separate point should be included to state that the amount of SANG land needed can also depend on the size, scale and proximity of the development to the SPA as well as the number of expected occupants. The 8ha per 1,000 people standard is only the minimum that could be required. 	<p>The Policy calls for a minimum of 8 hectares of SANG per 1,000 new occupants. Paragraph 4.3.57 states “a greater provision may be required where local or other circumstances indicate that this minimum amount would not be sufficient”.</p> <p>Further clarification is not considered necessary.</p>
<ul style="list-style-type: none"> Disagrees with paragraph 4.3.51 which should be revised. Natural England advise that there is potential for developments under the use class C2 to have a significant impact upon the SPA even if they are not for staff. The main consideration for applications, particularly those including care facilities (in either use class C2 or C3), is the mobility of the residents and therefore the risk that the residents could recreate on the SPA, causing a likely significant effect on the integrity of the site. C1 accommodation could also have a significant effect on the SPA depending on the length of time that people could stay at the facility and whether it could be a person’s fixed address e.g. ‘apart-hotels’. C1 and C2 applications should be assessed on a case-by-case basis in consultation with Natural England. 	<p>The following change has been added to the minor modification sheet to amend the second bullet point:</p> <ul style="list-style-type: none"> Units of staff-residential accommodation falling within Use Classes C1 and C2”.

<ul style="list-style-type: none"> The end of paragraph 4.3.54 should include that these developments will be assessed on a case-by-case basis and agreed with Natural England. 	<p>Added to minor modifications.</p>
<ul style="list-style-type: none"> Paragraph 4.3.62 should be revised to state that SAMM contributions are held by Hampshire County Council and that Natural England only act as a host to the project. 	<p>Added to minor modifications.</p>
<p>Woking Borough Council</p> <ul style="list-style-type: none"> It will be helpful if the policy is drafted to avoid harm to the SPA rather than its current focus on mitigating identified adverse impacts. In this regard, an indication in Policy P5 of whether Guildford Borough Council has identified sufficient SANGs land to meet its development needs would be helpful. <p>The policy is confused and does not differentiate between mitigation and avoidance correctly. The policy should reflect the approach in NRM6 to avoidance as the first step.</p>	<p>The policy wording has been rewritten to differentiate more clearly between avoidance and mitigation. The steps in the policy indicate that avoidance is the first step.</p> <p>The identification of SANG takes place in the Draft Infrastructure Delivery Plan. The Draft Infrastructure Delivery Plan sets out that sufficient SANG has been identified in the right places to deliver development proposals.</p>
<ul style="list-style-type: none"> An indication in Policy P5 of whether Guildford Borough Council has identified sufficient SANGs land to meet its development needs would be helpful. 	<p>The Council has produced the Infrastructure Delivery Plan to accompany the Local Plan, which sets out how the sites in the plan can be delivered through enough SANG land in the right places.</p>
<p>Surrey Wildlife Trust</p> <ul style="list-style-type: none"> It may be useful to mention the role of SPA and SAC in the <i>Natura 2000</i> schedule, within the context of international commitments to biodiversity conservation, in view of future uncertainties around the proposed UK withdrawal from the European Union. 	<p>The following text has been added: “Special Protection Areas, along with Special Areas of Conservation form the Natura 2000 network. Natura 2000 is the EU contribution to the "Emerald network" of Areas of Special Conservation Interest set up under the Bern Convention, a treaty signed by 46 European states and some states in Africa. Natura 2000 also contributes to delivering the commitments of other international agreements and treaties, notably the Convention on Biological Diversity treaty opened at the Rio earth summit in 1992”.</p>

Wisley Property Investments

- Technical objection with respect to the precise wording of draft Policy P5, as it unhelpfully elides the first two distinct stages in what is known as the 'Habitats Regulations Assessment' (HRA) process, carried out under the Conservation of Habitats and Species Regulations 2010 (as amended).

These first two stages of the HRA process, which should be addressed in sequence, are the Screening and Appropriate Assessment stages respectively. The detail of the process to be followed is included in Appendix 4 with respect to Ecology.

The first paragraph of Policy P5 confuses the Screening and Appropriate Assessment stages of the HRA process by eliding the notions of "likely significant effect" (considered under Screening) and "adverse effect on integrity" (considered under Appropriate Assessment).

Amend the first paragraph of draft policy to read:

"Permission will not be granted for development proposals unless it can be demonstrated, through the provision of objective evidence, that the proposal would not be likely to contribute to likely significant effects on the Thames Basin Heaths Special Protection Area (SPA), either alone or in combination with other plans and projects, or if this is not possible, through an Appropriate Assessment that demonstrates that there will not be any adverse effect on the integrity of the SPA".

These points are noted and it is agreed that the policy should not confuse the stages of screening and appropriate assessment. However, the language in the first paragraph of the policy is considered appropriate as the aim of the policy is to avoid adverse effects on the integrity of the SPA. Therefore, a new paragraph of supporting text has been added beneath the policy which explains the process of screening and appropriate assessment as follows:

"4.3.50c 'Adverse effects on integrity' refers to the definition under the Habitats Regulations. In line with the Habitats Regulations, development proposals should be screened to establish whether they are likely to have significant effects on the SPA. All net new residential development up to five km from the SPA, and developments of over 50 net new residential units five to seven km from the SPA are considered likely to have a significant effect. Where significant effects are likely, proposals must undergo Appropriate Assessment to identify measures that avoid, as a first step, and mitigate any adverse effects. However, if residential developments provide or contribute to appropriate SANG and SAMM measures, they will not be required to undergo Appropriate Assessment."

<ul style="list-style-type: none"> • Bullet points 2, 3, 5, 6 and 7 of the draft policy wording, and its supporting text, make reference to the provision of SANG and SAMM as 'mitigation' measures. However, in line with the strategic approach advocated within the Delivery Framework discussed above, such measures are actually intended to prevent any net increase in recreational pressure on the SPA altogether, rather than mitigate (reduce) potential effects, and therefore are better labelled as 'impact avoidance'. All references to 'mitigation measures' in relation to this policy should therefore be removed and replaced by the term 'impact avoidance measures'. 	<p>The references have been changed to include "avoidance" where SANGs are discussed. SAMM constitutes mitigation so these references have been left in.</p>
<ul style="list-style-type: none"> • The last bullet point of draft Policy P5 is technically incorrect (or at least incomplete). Whilst bespoke impact avoidance measures should be agreed with Natural England under Policy NRM6 of the South East Plan), GBC is the competent authority for the purposes of the Habitats Regulations, and the decision maker. Hence, proposals for new SANGs cannot and should not be 'approved' by Natural England. Rather, Natural England is a key consultee. The reference to Natural England 'approving' SANGs should be deleted from the draft policy and paragraph 4.3.60. Instead, the important role of Natural England should be noted in their capacity as a key statutory consultee. 	<p>"Approved" has been changed to "agreed" to reflect the language in NRM6.</p>

Representations on Specific Issues	
<ul style="list-style-type: none"> In the case of the recent Wisley Airfield Planning Application, the applicant proposed to use a SANG that lay between the development site and the SPA, which would therefore have drawn walkers and dogs towards the environmentally sensitive area of the SPA. I am aware that Natural England is a statutory consultee, but this policy must be drafted so that the Council, and the Planning Committee in particular is not left having to accept advice that is clearly wrong-headed. This Policy is <u>our policy</u> for the protection of <u>our environment</u>, and it should make it quite clear that the Council and residents wish to apply conditions that prevent the negation of safeguards that have been developed specifically for the purpose of environmental protection. I propose that the TBHSPA Avoidance Strategy is reviewed, its provisions updated and strengthened, and that it is specifically called up in this policy so that the appropriate protection can be provided. 	<p>There is no reason why a SANG cannot lie between a development site and an SPA as long as it fulfils the primary purpose of avoiding impacts on the SPA brought by an increase in recreational pressure. This should be judged on a case by case basis as local circumstances are likely to be relevant.</p>
<ul style="list-style-type: none"> The plan gives priority to the Thames Basin Heath SPA over all other site specific contributions. This absence of flexibility is inconsistent with the Council's approach to all other S106 obligations. It is appropriate for the Council to review its current SPA policy through this LP, in accordance with the NPPF and the weight it attaches to, for example, sustainability, economic considerations and housing delivery. Draft Policy P5 contemplates situations where the integrity of the SPA may be protected through different liner thresholds or alternative mitigation measures and the reasoned justification to the policy that the Council's established pre-cautionary principle may be reviewed by its JSPB in the future. Furthermore, the legal requirement, enshrined in European Law, may well change as a consequence of the UK leaving the European Union. Therefore suggest that the fourth para of Policy I1 [policy I1 was renamed to ID1 in the 2017 plan] be deleted. 	<p>The protection of the SPA from the impacts of development is enshrined in law. Therefore, unlike other planning obligations, protection of the SPA is non-negotiable and it is appropriate that priority is given to the SPA over other contributions.</p> <p>The Policy must be consistent with South East Plan policy NRM6, which enshrines the approach detailed in P5 in regional planning policy.</p>

<ul style="list-style-type: none"> SAMM should be included in the monitoring indicators table, as it is supposed to monitor if this policy actually works. Simply claiming that the 2012 visitor study data indicates success of the avoidance strategy in drawing people away from the SPA is no evidence at all. Where is data based on measurement of visitor numbers to the available SANG within Guildford borough? Where is the evidence that SAMM programmes have any impact on the behaviour of residents that are dog owners? This would be more compelling evidence. <p>The Council chooses not to examine the health of the heath or even monitor visitor numbers as a measure of success. Reduced or static visitor numbers would be a minimum monitoring expectation.</p> <p>Where is the monitoring of avoidance/mitigation success proposed in 2008 in the Thames Basin Heaths SPA Avoidance Strategy section 5.1? The only "monitoring" of which I am aware are: simple visitor counts at the SANGs, NECR136 (which didn't address the effectiveness of SANGs). The policy does not include monitoring of the success of the approach or provide useful monitoring indicators.</p>	<p>The monitoring of the local plan deals with the implementation of policies.</p> <p>The effectiveness of the approach is monitored by the JSPB at a strategic level across the SPA. There would be no point in monitoring bird numbers and habitat condition within GBC alone as the SPA and the approach to protecting it must be viewed as a whole.</p> <p>The monitoring of SANG use is included within the SAMM project and therefore done centrally by the JSPB. Responsibility for monitoring falls to the JSPB.</p> <p>The Council has received advice from Cornerstone barristers that confirms the above.</p>
<ul style="list-style-type: none"> Suitable Alternative Natural Greenspace is not beneficial; the sites identified or targeted are already green space, which could be destroyed by urbanisation in order to spend the developer compensation received. SANG is just using agricultural or wooded land as recreation land in order to justify building on other green spaces nearby. There is no actual increase in open space or environmental protection; instead, it is a ploy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds . Car parking actually reduces the green space. 	<p>The potential SANGs identified in the Infrastructure Delivery Plan would mostly constitute new open space (land which is currently not publicly accessible but which could be made accessible). This is different from much of the countryside, where sites may have rights of way around or through them but the majority of the land is not accessible. Therefore, it clearly represents an increase in open space as defined by the NPPF.</p> <p>Where SANGs are proposed on existing open space, the capacity of the site for SANG must be discounted based on existing use as a requirement of the SANG guidelines. In these cases, the benefit will be provided by improvement to the accessibility or character of the land.</p>

<ul style="list-style-type: none"> • SANGs have no basis in law, even though they are being used as some sort of legal loophole. <p>No independent evidence has been provided to demonstrate they work, and no scientifically sound monitoring has yet been published, despite the Regulations first being implemented in UK law in 1994 and this strategy (and a similar interim one previously) being in place since 2006.</p> <p>Where is the evidence base that led to the introduction of this strategy in the first place? Where was it trialled?</p>	<p>The evidence that led to the introduction of the approach is set out in the background paper available in the appendices of the Thames Basin Heaths Special Protection Area Avoidance Strategy 2009.</p> <p>Natural England report NECR 136 found that there had not been a significant increase in visitors to the SPA despite an increase in the number of dwellings in the vicinity of the SPA, which would indicate that the approach is working and that an impact from increased recreational pressure has been avoided. Bird populations have also now returned to at least designation levels, which further indicates a success.</p>
<ul style="list-style-type: none"> • There is no evidence that the approach is working/there is evidence that the approach is not working. <p>A survey in 2008 showed that more than 83% of visitors to the SPA arrived by car and that 70% of those had come from within 5km of its access point. A very large proportion of the TBH SPA visitors are dog walkers, many of whom visit a particular site on a regular basis. A follow-up survey in 2012 found that there was a 10% increase in visitors to the SPA. The prevalence of dog walking in the visitor survey suggests that the currently available SANG in the borough is ineffective in attracting those wishing to exercise dogs away from the TBHSPA. Many SPA sites are still being visited by dog walkers in large numbers even when SANGs are supplied. The Council's own surveys show that SANGs do not work.</p> <p>A survey of households carried out by a veterinary team at Bristol University in 2010 "Number and ownership profiles of cats and dogs in the UK" published in the Journal of The British Veterinary Association indicates 31% households own dogs and 26% households own cats. Dogs were more likely to be owned by rural households.</p>	<p>Natural England report NECR 136 found that there had not been a statistically significant increase in visitors to the SPA despite an increase in the number of dwellings in the vicinity of the SPA, which would indicate that the approach is working and that an impact from increased recreational pressure has been avoided. The 10% figure mentioned in the comment fell within statistical significance and therefore does not indicate an increase in visitors.</p> <p>The report was not able to put this apparent success down to the provision of SANGs. A further report is due in 2017 which will seek to link SPA visitor data to SANG visitor data to clarify the relationship.</p> <p>Survey figures in 2016 showed that other than woodlark, both the numbers of Nightjar and Dartford Warblers remain above the baseline figures set at the start of the strategy so for the majority of endangered bird species as a whole the measures appear to be working well. These figures are from across all the boroughs within the Joint Strategic Partnership and not just within our borough, which indicates the wider success of the measures on a landscape scale across the SPA. Notably, these</p>

<p>Applying this analysis for all new housing at the listed strategic housing sites in the draft Local Plan within the 400m-5km mitigation zone of TBHSPA (in total 7,000 new homes), the cumulative impact of dog ownership (up to an estimated 2,200 new dogs within 5 km of TBHSPA) with dog-walker incursions on the rare bird species habitat of the TBHSPA will be a devastating increase. No amount of SANG nor SAMM programmes will change human behaviour and the draft Local Plan evidence base contains no studies or data to prove otherwise, it contains only unproven assertions. Natural England can provide no survey evidence of the effectiveness of SANG or SAMM programmes in attracting dog-walkers and other visitors away from TBHSPA.</p> <p>The plan will have adverse effect on the integrity of the Thames Basin Heaths Special Protection Area (or any other Special Protection Area (SPA) or Special Area of Conservation(SAC)).</p>	<p>baseline targets for the endangered bird species have been achieved in the face of a decade of ongoing development and population increase across all the SPA affected boroughs.</p> <p>The view of the Joint Strategic Partnership Board which, monitors the approach, is that the approach is working. The plan will therefore not result in adverse effects on the integrity of the SPA.</p> <p>SACs are protected in line with national policy through policy ID4.</p>
<ul style="list-style-type: none"> Paragraph 2.3 of the Topic Paper states that draft Policy P5 will supersede saved Policy NRM6 of the South East Plan when adopted. This is not correct, and should be amended. In fact, Policy P5 must be in accordance with Policy NRM6, which will continue to remain in force as Regional Policy until such time as it may be revoked. 	<p>The Green and Blue Infrastructure topic paper has been amended to reflect this.</p>
<ul style="list-style-type: none"> Protection of the SPA is driven by European Directives . It is an area that has raised considerable questions and is therefore likely to be reviewed following Brexit. The commentary should reflect this. <p>When the European Communities Act is revoked it may be replaced with less onerous and more flexible UK legislation to protect certain ground nesting birds. The present regime is a blunt instrument.</p>	<p>While protection is driven by European Legislation, the protection has been codified into UK law. Protection is also enshrined in a number of international treaties and agreements on biodiversity that would not be affected by withdrawal from the EU.</p> <p>There is no indication at this stage that the current approach will be changed at a national level.</p> <p>At this time, Local policy must be in general conformity with the approach set out in South East Plan policy NRM6.</p>

<ul style="list-style-type: none"> There is no evidence that the impact of nitrogen and acid deposition on the heathland (alone or in combination) and the consequent degradation of the heathland has been taken into account. <p>See the attached document by Baker Consultants specifically in response to the planning application almost identical to policy A35 which is relevant for all sites close to the SPA.</p>	<p>The HRA for the plan takes the impact of traffic pollution into account and finds that it will not have an unacceptable impact on the SPA. The HRA takes account of growth outside the borough and therefore considers in combination effects</p>
<ul style="list-style-type: none"> 4.3.51 and 4.3.54: The RSPB notes that these paragraphs contain some uncertainty about whether student accommodation is required to provide SANG and SAMM. This uncertainty appears to be down to the last two sentences of paragraph 5.3.54. We recommend that the text is amended to read “The need for student accommodation and other permanent accommodation, and other types of permanent accommodation not listed in paragraph 4.3.51, to provide SANG will be assessed on a case by case basis: it will be the responsibility of the scheme promoter to provide information through a Habitats Regulations Assessment that demonstrates that SANG are not required for that particular development because its residents will not cause a net increase in recreational pressure upon the SPA.” 	<p>The Council does not agree with this amendment. The decision over whether student accommodation must contribute to or provide SANG and SAMM is decided on a case-by-case basis in consultation with Natural England. There will be adequate consideration of the requirements of the habitats regulations as a result. However, in specific cases, a full Habitats Regulations Assessment may be required.</p>
<ul style="list-style-type: none"> Students do not keep dogs as pets and do not generally visit the SPA. Therefore, student accommodations should not be listed in P5 as accommodation that will need to contribute to SANG and SAMM. 	<p>There is no evidence that students do not visit the SPA.</p> <p>However, it is acknowledged that student accommodation may not have the same impact as other forms of permanent accommodation. Therefore, the requirement for student accommodation to contribute to SANG and SAMM will be considered on a case by case basis. This is set out in paragraph 4.3.54.</p>

<ul style="list-style-type: none"> The policy has recently introduced some further new text which indicates that where new developments are proposed in the zone of influence (between 400m and 5km linear distance), avoidance and mitigation measures must be delivered prior to occupation of new dwellings. In this context the Council needs to clarify in the text, as Waverley Borough Council have, that the term 'avoidance' relates to the provision or contribution towards Suitable Alternative Natural Greenspace (SANG) sites. 	<p>It is considered that this is covered adequately in paragraph 4.3.57 where it states that SANGs avoid the impact of new residential development and discusses the amount of SANG land needed to provide avoidance.</p>
<ul style="list-style-type: none"> Objection to new paragraph 4.3.50c as all developments should comply with the habitats regulations and undergo appropriate assessment in order to ensure no significant impact on the SPA. <p>Objection to removal of 4.3.53 – all developments within 400m of the SPA should have to undergo appropriate assessment.</p>	<p>Paragraph 4.3.50c conforms to the approach set out in the Thames Basin Heaths Special Protection Area Delivery Framework and advice issued by Natural England.</p> <p>Paragraph 4.3.53 was removed following advice from Natural England.</p>
<ul style="list-style-type: none"> The proposed amendments to sentence 2, paragraph 1 of the Policy (“Where one or more adverse effects on the integrity of the SPA will arise, measures to avoid and mitigate these effects must be delivered and secured in perpetuity.”) introduces a degree of certainty into the required test that cannot realistically be achieved. This will mean that it will be much easier for developers to evade their intended responsibilities to avoid and/or mitigate any effects of their proposed development(s) on the SPA. 	<p>This is not agreed.</p> <p>The first sentence of the policy states “Permission will only be granted for development proposals where it can be demonstrated that doing so would not give rise to adverse effects on the ecological integrity of the Thames Basin Heaths Special Protection Area (SPA), whether alone or in combination with other development.”. This means the precautionary principle is applied. The likelihood of adverse effects is considered at this stage.</p> <p>Where measures are being implemented to avoid and mitigate adverse effects on the SPA then the stage of considering whether such effects are likely (i.e. the likely significant effects test) has been passed and it has been determined that such effects will arise.</p>

- The imposition of mitigation measures on individual town centres presents a viability constraint which favours use of green belt sites rather than brownfield. There is already a good proportion of open space within the town centre (in a borough with 89% of the land designated as green belt). More would come forward if a deliverable masterplan is approved. This can be then counted towards provision of SANG land with no requirement to provide contributions to other land outside of the town centre. It is therefore suggested that the requirement for town centre sites, developed as part of a comprehensive plan, to contribute to SANGs land is removed from the Local Plan to increase the viability of these sites to develop sufficient affordable housing units, and to help meet the additional infrastructure burden. Affordable housing viability comes after SANG, CIL s106 and so forth. There is absolutely no indication in the Local Plan that a single affordable housing unit would be built on this basis.

Policy NRM6 of the South East Plan requires the provision of SANG and SAMM for all net new residential development within 5km of the SPA. The Council is unable to exempt any developments from this requirement.

SANGs must meet the high standard of quality set out in Natural England's SANG guidelines, which, among other things, requires them to have a natural or semi-natural character. It is likely that parkland in the town centre would be formal open space and intruded upon by the urban environment with the result that it would not be suitable for SANG. However, the Council will consider the possibility of some or all of any new open space within the town being used as SANG as proposals emerge.

E1: Meeting employment needs

Main Issue	Guildford Borough Council Response
<p><i>Representations from Prescribed Bodies and Selected Stakeholders</i></p>	
<p>Surrey County Council</p> <ul style="list-style-type: none"> Concerned about the delivery of the economy policies if one or more of the key development sites for employment use were not able to proceed due to transport or other reasons. Policy A25: Gosden Hill Farm, policy A26: Blackwell Farm and policy A35: Land at former Wisley airfield are all important for meeting employment needs. 	<p>At this stage, the evidence supporting the Local Plan suggests that the sites are deliverable in the plan period and that transport should not constrain the delivery. However, more detailed transport assessments will be required.</p> <p>The Local Plan will be carefully monitored and if the employment floorspace needed is not being delivered, a review of the Local Plan will be required.</p>
<p>Surrey County Council</p> <ul style="list-style-type: none"> Would be helpful if the supporting text were to include more detailed explanation of what the LEP is and how it operates, that the reference to the role of Guildford as a Growth Town in the LEP's Strategic Economic Plan could be expanded and that the submission version of the Plan could contain information about the recent Growth Deal projects for the area. The supporting text should be expanded to include reference to these points. 	<p>The introduction to Policy E1 has been amended to include more detail on the Enterprise M3 LEP.</p>

Representations on Specific Issues	
<ul style="list-style-type: none"> The plan does not provide sufficient B1a, B1c, B2 & B8 to meet the employment needs. <p>There is Insufficient floorspace to cater for existing businesses, let alone an expanded workforce and a balanced economy.</p> <p>Encourage further consideration to be given in planning for storage & distribution employment space to meet the needs of the warehousing/logistics sector in the South East, a region which has been recognised as experiencing a particular shortage.</p> <p>ELNA 2015 does not show need for an industrial area.</p>	<p>The ELNA has been updated to account for economic forecasts published after the European Union Membership Referendum held in June 2016 in order to ensure it is as up-to-date as possible. AECOM use an approach considered to be robust - to convert the anticipated growth in employment to the amount of new employment floorspace required over the plan period.</p> <p>The plan seeks to meet the identified need for floorspace and not to meet market demand.</p>
<ul style="list-style-type: none"> This allocation for the Surrey Business Park is unlikely to be delivered in the plan period. The University do not build speculatively. Only work with organisations who plan 2 years ahead not 3-6 months. 	<p>The Employment Topic Paper, in addition to the introduction and reasoned justification of Policy E4, establish the importance of Surrey Research park to the Guildford economy. The site at Blackwell farm has provided an opportunity to extend the Research Park. Although a large amount of the B1a/B1b floorspace will be focused on this site, other sites will also provide new floorspace as set out in the plan. Guildford town centre remains our preferred location for this type of development. However, we have been unable to identify a number of sites which we believe are likely to come forward for development over the plan period. This has resulted in us having to search a wider area. B1a/B space will also be delivered at Gosden Hill, The Pirbright Institute, Surrey Satellite, the Former Wisley Airfield and on the new site as Send Business Park.</p>
<ul style="list-style-type: none"> EM3 LEP would encourage the Council to give further consideration on how additional employment sites to meet the demand for office space within the town centre can be incorporated to support the continued growth and prosperity of the town centre. 	<p>As set out in Policy E2 of the Proposed Submission Local Plan, the town centre remains the preferred location for use class B1a and B1b floorspace. However, there is a lack of available sites in the town centre being brought forward for this type of development.</p>

<ul style="list-style-type: none"> Some of the strategic industrial sites would be better used for housing, e.g. Woodbridge Park/ Woodbridge Road / Merrow Lane/ Walnut Tree Close. 	<p>The role of the Local Plan is to meet the needs for both homes and employment floorspace over the plan period in addition to the needs for retail, leisure and other uses such as allotments and burial grounds. Industrial land is generally less value than residential. The Local Plan must protect land in existing industrial use (where appropriate) to ensure that we meet all needs, and that land is simply not left to the market and the highest land value.</p> <p>The south end of Walnut Tree Close is no longer being protected as a result of the changing nature of the area. Woodbridge Meadows remains a commercial area.</p> <p>The ELNA has identified the need for storage and distribution in the borough over the plan period and the Local Plan seeks to meet this need on the sites identified. There may be market demand for further space but the Plan seeks to meet the need and not demand.</p>
<ul style="list-style-type: none"> Industrial and commercial businesses must be concentrated in the urban area, or existing business parks (e.g. Slyfield) not in the rural environment which lacks infrastructure. <p>The rural environment must support micro or high tech businesses, agricultural industries, and tourism, rather than general industrial development.</p>	<p>As set out in Policy E2 of the Proposed Submission Local Plan, the town centre remains the preferred location for use class B1a and B1b floorspace. However, there is a lack of available sites in the town centre being brought forward for this type of development. The next sequentially preferable sites are those within 500m of a public transport interchange, as set out in the NPPF, followed by the Office and R&D Strategic Employment sites.</p> <p>Industrial uses are low trip-generating uses that are not subject to a sequential test.</p> <p>More detail on the selection of sites is set out in the Employment Topic Paper and further information is provided in the Housing Topic Paper where the sites are mixed use.</p>

<p><i>Specific Sites:</i> <i>Walnut Tree Close / Woodbridge:</i></p> <ul style="list-style-type: none"> The existing employment development along Walnut Tree Close should unless incorporated within the Guildford Town Centre Employment Core, also be included as an SES or a LSES. <p>Walnut Tree Close and Woodbridge Meadows should not be employment zones. If 10 Ha of employment land from both of these areas was relocated to either the Gosden Hill Farm or Blackwell Farm allocations (both to be served by the SMC and new rail stations), they would displace land for appropriate residential densities at 30-40 dwellings per hectare (DPH) giving a total of up to 400 homes. However, the area which would be created at Walnut Tree Close and Woodbridge Meadows through rezoning would be appropriate for densities of up to 200 DPH delivering up to 2,000 homes. This would deliver a net increase of 1,600 homes across the lifetime of the Plan for an equivalent land take.</p>	<p>The site comprises many long-term leasehold properties and is not therefore available for residential development within the plan period. The site is subject to significant flooding constraints. It also provides a valuable contribution to meeting our industrial floorspace needs. Both Gosden and Blackwell are allocated for additional employment floorspace but this is required to meet future needs in addition to existing floorspace.</p>
<p><i>Broadford Business Park:</i></p> <ul style="list-style-type: none"> Broadford Business Park has historically been allocated as a strategic employment site. However, as has been evidenced in the Commercial Agents Report that accompanies these representations (refer to Section 11 for more detail) the location of the Site combined with the substantial refurbishment costs makes the retaining the current designation unviable in the medium to long term. 	<p>This site is previously developed land in the Green Belt and was allocated for 100 homes in the Proposed Submission Local Plan 2016. Since the last iteration of the plan we have reconsidered how best to meet both housing and employment needs. Given the loss of employment sites to housing that has already occurred due to permitted development rights, which is expected to continue, we are concerned at the ability to provide sufficient and varied office floorspace. Broadford is an established business park and, whilst not sequentially preferable, is considered suitable given the inability to identify sufficient sequentially preferable sites. It provides a mix of industrial and office space. It is home to companies such as Gordon Murray Design, a British visionary design and engineering company and Surrey County Council. It is not grade A space and</p>

	consequentially meets the need for lower cost employment space in the borough. The retention of Broadford will help provide a variety and mix of office and industrial floorspace.
<p><i>Burnt Common (A58):</i></p> <ul style="list-style-type: none"> There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have many empty sites and industrial units. An extension to the Slyfield Industrial Estate would be more appropriate. <p>There are patently no exceptional circumstances in terms of demand for employment space to build on this important area of Green Belt that effectively separates existing development in Send and Ripley and prevents urban sprawl.</p> <p>The plan should be amended to provide an upper limit for the amount of employment floorspace to be created within Policy A58 – Land around Burnt Common warehouse</p> <p>Send Parish Council does not object to the principal of employment land development on this site. Indeed, in representations made to the draft 2016 version of the Local Plan, Send Parish Council proposed that Guildford Borough Council re-instate the previous allocation for industrial development on Land around Burnt Common Warehouse. However, Policy A58 does not provide an appropriate limit to the scale of industrial development to take place on this site. The previous allocation for employment land at Garlick's Arch stated that up to 7,000sqm of employment floorspace would be created. No such maximum exists within Policy A58, with at least 7,000sqm of employment land proposed on Land around Burnt Common Warehouse. Send Parish Council deem this approach unacceptable as it opens the door to a significant intensification of employment uses on the site which would not be suitable for the site.</p>	<p>Industrial and warehouse vacancy within the borough is not excessive. This issue is considered in the ELNA.</p> <p>The exceptional circumstances relating to the release of this site from the Green Belt relate to meeting employment needs over the plan period. No suitable site has been identified in the urban area to meet this need.</p> <p>The site's capacity is in excess of the 7000m² figure allocated for development during the Plan period. However, if additional need is identified within the Plan period, through a review of the Employment Land Needs Assessment, the site allocation provides flexibility to meet this need (subject to compliance with other policies within the Plan, such as impacts on amenity and traffic).</p> <p>The Council recommends to the Inspector that: <i>Policy A58 be amended to clarify its intention.</i></p> <p>The amendments read:</p> <p>The site is allocated for a minimum of 7,000 sq m of a mix of light industrial (B1c), general industrial (B2), and storage and distribution (B8) over the plan period with a potential for further industrial floorspace to meet future borough needs, as identified through subsequent updates to the Employment Land Needs Assessment (ELNA).</p> <p>Text added to Key considerations:</p> <p>(3) An initial masterplan for the site has shown that it has total capacity for more than 7,000 sq m. However, the ELNA anticipate that approximately this amount will be required over the plan period to 2034 to meet identified needs. The ELNA will be updated every three years and if updates show a higher need for</p>

<p>While Send Parish Council recognises the importance of developing a strong rural economy, this significant increase in employment land within the Parish is unsustainable and uncalled for. Send Parish does not have the requisite amenities, facilities, and infrastructure to support two Strategic Employment Sites within its boundaries. The stipulation of a 'minimum' area of development at Burnt Common means that this could turn into a large and intensive industrial site, quite unsuitable for its semi-rural location.</p>	<p>industrial class floorspace, this site would be able to provide a larger amount either within or after the plan period.</p>
<p><i>Send Business Centre:</i></p> <ul style="list-style-type: none"> Object to significant parts of the curtilage of the site has being, excluded from the allocation. <p>Should be identified as a Strategic site not a Locally Significant Employment Site.</p> <p>Should not be any difference between the wording in the protection of strategic and locally significant sites because of their importance to the Borough's economy.</p>	<p>Curtilage of Send Business Centre site has been amendment in light of new evidence submitted.</p> <p>Send Business Centre has been identified as a Strategic Employment site in light of evidence submitted regarding the existing quantum of floorspace and number of employees. It is the smallest of the sites but has met the criteria.</p> <p>Wording of Policy E2 has been amended so it no longer conflicts with Policy E1.</p>
<p>Send Business Centre</p> <ul style="list-style-type: none"> There is highly restricted vehicular access along Tannery Lane in both directions. It is a rural single-track road with only irregular passing places for vehicles and as such is not appropriate for significant use by commercial vehicles. It provides no street lighting or infrastructure for pedestrians or cyclists. <p>Access to public transport provision at Send Business Centre is very poor. The closest bus stop, which has only hourly bus services to Guildford and Woking, is located in Send village centre and is accessed by a ten-minute walk along the aforementioned Tannery Lane, lacking pedestrian</p>	<p>The Employment Topic Paper sets out the reasons for the site being designated as a Strategic Employment Site (paragraph 4.44 onwards).</p>

infrastructure, cycle infrastructure, or street lighting. For the 2017 ELNA to refer to this situation as constituting "good" access to public transport does not make logical sense.

Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate. The Business Centre is located in high sensitivity Green Belt unsuitable for significant development.

The 2016 Strategic Flood Risk Assessment should be revisited to include Send Business Centre in order to consider the impact of development on Tannery Lane's flooding issues. The susceptibility of the area to groundwater flooding was clearly set out in the environmental statement [Volume 8, Water, prepared by Johns Associates.] submitted with the marina application.

2015 ELNA states that there is no potential for intensification and/or additional floor space at the Send Business Centre. This reflects the constrained nature of the site in light of its setting within high sensitivity Green Belt. In the 2017 ELNA, it is stated that there is potential at Send Business Centre for intensification and/or additional floor space. The report does not give an indication as to why this stance has altered in the two years that passed between the 2015 ELNA and the 2017 ELNA, nor how potential intensification and/or additional floorspace would be catered for at the Centre. It does not explain why such growth could not be accommodated in more appropriate locations.

Land North of Slyfield Industrial Estate (Formerly Site 63):

- Policy E1 is unsound because the policy has not been positively prepared, adequately justified, is not effective in meeting the needs and therefore remains inconsistent with the NPPF, as it does not allocate sufficient land to provide a range and choice of employment premises over the plan period to accommodate growth required for the borough's economy to develop and strengthen.

Plan Modifications Sought

In order to make Policy E1 and the Site Allocations sound in this respect:

1 The ENLA and Policy E1 should revisit the actual employment floorspace needed (which we have not revisited again) ;

2 Policy E1 and the Site Allocations should identify the North Slyfield Site for employment use development (if necessary prioritised ahead of land at Garlick's Arch, Send Marsh and at Burnt Common, given it is a better planning option), such that:

- Policy E1 is amended to read: "(8) When developed, the new employment site at North Slyfield, will be treated as an Industrial Strategic Employment Site"; and
- An additional Site Allocation is identified within the Guildford Urban Area.

The reasons for the exclusion of this site are set out in the Employment Topic Paper. The identified need for employment land over the plan period was significantly less in the 2015 (and 2017) ELNAs than in the 2014 ELA. Therefore, the number of sites needed to meet the need was reduced. The spatial strategy and site allocations have been considered through the Sustainability Appraisal and this site no longer accords with the proposed spatial strategy in the Local Plan. The site was not identified in the Green Belt and Countryside Study and is located within high sensitivity Green Belt. The Council does not consider it appropriate to allocate land within high sensitivity parcels unless there is strong justification for doing so. As the need has been met on other sites, it is no longer considered appropriate to remove this site from the Green Belt and allocate for industrial use.

<ul style="list-style-type: none"> While the town centre can be a suitable location for Offices (use B1a) – assuming that journeys to it are not made by car - it is not so for Research and Development (B1b). R and D normally requires spacious sites and usually some industrial equipment and has low employee density. I ask that class B1b be removed from this policy objective. 	<p>The key evidence which supports the employment policies is the Employment Land Needs Assessment (ELNA). In this document consultants AECOM split employment land and combined B1a and B1b and also combined B1c, B2 and B8. This is how the quantum have been identified so this split has followed through into the policy. The B1b use class covers a wide range of activities and some activities such as those in the creative video and gaming sector fall into Use Class B1b and do not necessarily need the same amount of space as other B1b activities, they require the same density as standard B1a offices. Therefore, the Council does not propose to amend the wording of the policy. If a specific B1b use can demonstrate it is a low employee density and has a high floorspace requirement then a case could be made for locating outside of the town centre. Policy cannot cater for all eventualities.</p>
<ul style="list-style-type: none"> Only high added-value business uses are desirable, contributing to a modern “knowledge economy”, not low grade, low employment warehousing. <p>B1 desirable not B8 (generates at least 5 times as much employment).</p> <p>Concentration of high value (i.e. Hi-tech) industries, which require less space resources, should be encouraged.</p>	<p>The Employment Land Needs Assessment (ELNA) has identified the need for both B1a/B1b, and B1c/B2/B8 uses over the plan period. The Local Plan seeks to meet all of the identified needs for; housing, retail, leisure, and both office/R&D, general industry/storage and distribution uses.</p>
<ul style="list-style-type: none"> Monitoring Indicators, the source for monitoring should be buildings constructed. 	<p>The monitoring indicator has been amended so it now relates to both planning applications and building completions data.</p>

- Object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

The site at Gosden Hill Farm is being brought forward for mixed-use development including residential, employment, retail, community and education uses. The site selection is set out in more detail in the Housing and Employment Topic papers. The impact on the transport network has been considered and further work will be undertaken before the site is developed.

The site layout will be carefully considered to ensure conflicting uses are appropriately separated. It is proposed to locate the office HQ building adjacent to the A3.

Draft

E2: Locations of new employment floorspace

Main Issue	Guildford Borough Council Response
<p>Representations from Prescribed Bodies and Selected Stakeholders</p>	
<p>Surrey County Council</p> <ul style="list-style-type: none"> Reference should be made to the inclusion of suitable waste management facilities as this would reinforce the principle of directing waste facilities first to industrial/employment sites in urban areas in accordance with Policy CW5 of the Surrey Waste Plan 2008 (SWP) which sets out sequential principles for the location of waste management facilities and Policy CW5 which states that "planning permission for development involving the recycling, storage, transfer, materials recovery and processing of waste will be granted on land that is, or has been used, or is allocated in a Local Plan or DPD or has planning permission for industrial or storage purposes". 	<p>Additional wording has been added to the reasoned justification to provide clarity on waste management facilities (paragraph 4.4.23a)</p>
<p>Surrey County Council</p> <ul style="list-style-type: none"> There is no need for additional employment land. The plan should utilise vacant industrial and office buildings rather than build new ones. 	<p>The Employment Land Needs Assessment (ELNA) identifies the additional employment floorspace/land needed over the plan period.</p> <p>Some vacant property is required for the effective functioning of the property market. It allows change to be accommodated and supports the increased growth from existing enterprises and those firms looking to move to the borough. Consultants AECOM who produced the ELNA use the term 'frictional vacancy', which represents the optimum level of surplus capacity in the market at a given time to allow for an efficient churn of occupancy. The rate of 5% is an industry standard and they believe to be suitable for Guildford borough.</p>

Representations on Specific Issues

Sequential test:

- Concern with the inference given in Policy E2 that there will be some form of ‘sequential test’ in considering proposals for employment development on designated Strategic Employment Sites (unless it is for development of less than 200sqm). This is at odds with other parts of the Employment policies. If otherwise acceptable proposals come forward on a Strategic Employment Site, why should such proposals need to be ‘sequentially tested’?

For example, Send Business Centre provides for the creation and development of small and local businesses by encouraging a range of types and sizes of new premises including incubator units, managed workspace and serviced office accommodation – precisely the type of business accommodation identified under Policy E1(3) that the Plan says: ‘*will be supported*’.

If employment proposals otherwise meet with other policies in the Plan, then there is no need to sequentially test employment development on Strategic Employment Sites. Whilst criterion (2) confirms that ‘*the sequential approach does not apply to proposed employment floorspace included in the Site allocations in the Local Plan*’, such as the extension to the SRP under policy E4 (A26), the policy as currently worded would require any site wide employment redevelopment proposals for existing Sites within the SRP to meet the sequential test.

Concern that this unnecessarily restricts the expansion and investment plans of those businesses already located on SRP, who are equally allocated within the proposed Strategic Employment Site under draft policy E2. This would be contrary to the NPPF, notably the following objectives:

1. -building a strong, competitive economy is a key policy objective and there is a clear commitment to ‘*securing economic growth in order to create jobs and prosperity,*

High trip-generating uses do need to be sequentially tested unless they are in a centre or allocated in an up to date Local Plan.

The NPPF states:

‘Local planning authorities should apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan. They should require applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered.’

The Council considers that the policy complies with the NPPF whilst seeking to provide opportunity for growth subject to sustainable criteria.

Policy E2 would apply to any net growth in floorspace. It is necessary to establish if high trip generating floorspace can be located in a sequentially preferable location before allowing it in the strategic Employment Sites. Small-scale expansion of existing occupiers is acceptable but large-scale expansion should be tested sequentially and/or an exception to policy be fully justified.

The requested amendment would be contrary to the NPPF as outlined previously. The amendment is also not justified by local circumstances, as identified ‘need’ is met by the site allocations within the Local Plan.

Proposals for B1c, B2 and B8 are not subject to the sequential test as they are not high trip-generating uses.

<p><i>building on the country's inherent strengths'</i> (para 18 – 22);</p> <ol style="list-style-type: none"> 2. -<i>'Planning should operate to encourage and not act as an impediment to sustainable growth'</i>. (Para. 19); 3. investment in business should not be <i>'over-burdened by the combined requirements of planning policy expectations'</i> (para. 21); and, 4. -local planning authorities are expected to <i>'support existing business sectors, taking account of whether they are expanding or contracting'</i>, whilst ensuring that policies are <i>'flexible enough to accommodate needs not anticipated in the plan and to allow for a rapid response to changes in economic circumstances'</i> (para. 21, bullet point 3). <p>Request that criterion 2 to Policy E2 is amended to confirm that the sequential approach will not apply to proposals for the site wide redevelopment or intensification of existing employment premises within the defined strategic employment sites (including the SRP).</p> <p>3.35 The inclusion of this part of the policy significantly undermines the overall strategy for the provision of floorspace in the borough. The addition of this wording is in direct contradiction to the first part of the policy which directs development to the town centre. It now demonstrates that there has been little rationale to including employment space on the strategic allocations other than to meet the need specified in Policy E1.</p>	<p style="text-align: center; opacity: 0.5; font-size: 48px; font-weight: bold;">Draft</p>
<p>Waste Management:</p> <ul style="list-style-type: none"> • Objection to the change in Policy E2 under paragraph 4.4.23a in relation to development involving waste management facilities to be directed to the Industrial Strategic Employment Sites. This fails to provide sufficient public consultation in relation to access and traffic flows. 	<p>Any proposal for waste facilities would need to seek planning permission. This would include consultation and an assessment of the access arrangements and traffic impacts.</p>

Representations on Sites	
<p><i>Town Centre:</i></p> <ul style="list-style-type: none"> All new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre. A preferred location for increased B1a and B1b space would be in the Town Centre close to housing and a convenient transport hub. <p>Objection to directing new office and R&D development to Guildford TC first. This presumption completely contradicts a desire to create sustainable local communities.</p> <p>It would be more sensible to confine new office and research and development floor space to the urban Guildford area/Guildford town centre.</p> <p>This is a highly restrictive policy with sequential tests originally being designed more for retail purposes than office and it will stagnate development.</p> <p>Para 4.4.23 also contradicts the restrictive policy behind the sequential test, given that there is a desire to ensure that buildings are available. Whilst development in the most sustainable locations is a laudable target, we do not live in a perfect world where this can be created and flexibility within the Local Plan is an important factor.</p>	<p>In conformity with the NPPF, the town centre remains the preferred location for use class B1a and B1b floorspace. However, there is currently a lack of available sites in the town centre being brought forward for this type of development. Within the plan period it is likely that circumstances will change and that sites not currently available may come forward for development. When available, these would be the most sequentially preferable.</p> <p>The next sequentially preferable sites are those within 500m of a public transport interchange, followed by the Office and R&D Strategic employment sites. These generally have good existing infrastructure. The exceptions to this are floorspace for site allocations set out in the Plan.</p> <p>Site availability will change over time. The policy needs to be able to adapt to these changes in circumstances.</p>
<p><i>Blackwell Farm / Surrey Research park:</i></p> <ul style="list-style-type: none"> Object to the policy of expanding the Research Park onto Blackwell Farm and we do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt. <p>The existing Research Park has the opportunity to markedly increase its density without infringing any Green Belt land nearby.</p>	<p>The site at Gosden Hill Farm is being brought forward for mixed-use development including residential, employment, retail, community and education uses. The site selection is set out in more detail in the Housing and Employment Topic Papers.</p> <p>Some of the anticipated floorspace will come forward on the existing Research Park. However, as set out in Policy E4, the low-density nature of the park is part of its character and appeal.</p>

<p>Stations:</p> <ul style="list-style-type: none"> • Effingham Junction Station should be defined as a Public Transport Interchange. <ul style="list-style-type: none"> • Railway line splits here • Serves Effingham, Little Bookham and Cobham, • Serves local leisure activities -3 paintball and 2 clay pigeon sites • Closest station to former Wisley airfield • Green Belt aspect inconsistent with Horsley • EJS is not located in an AONB • EJS is not “isolated” or “away from the village centre” • Has more businesses within its 500 metre envelope than either Clandon or Horsley stations, especially if retail is excluded. <p>The Local Plan needs to protect employment/retail/health centre sites near Effingham Junction Station and create conditions for their sustainable growth and job creation.</p>	<p>The station was reconsidered and a further site visit undertaken but because of the small number of commercial premises around the station and the predominantly residential nature and character of the area we do not consider that it is sequentially preferable sustainable or appropriate to direct office development over 100 sq m here. Therefore, the station will not be classified as a transport interchange.</p> <p>The Local Plan will protect employment sites, retail units and the health centre near Effingham Junction Station as set out in the relevant polices within the Plan.</p>
<ul style="list-style-type: none"> • Objection to Horsley station and London Road being transport interchanges. 	<p>The Employment Topic Paper establishes further detail on the selection of stations which are defined as public transport interchanges. However, both London Road and Horsley stations fall within the urban area so it is considered appropriate that they have been included.</p>
<p>Monitoring Indicators:</p> <ul style="list-style-type: none"> • Under the monitoring indicator for B1c, B2 & B8, the target is to have 100% of permitted development on industrial strategic employment sites. This is too restrictive. <p>Under the section for small business units, the target simply states “percentage of B Class development proposals incorporating units of less than 50 sq m”. This is not actually a target, as a target has to be a proposed figure.</p>	<p>The Council agrees that this wording is too restrictive. Therefore, the Council recommends to the Inspector that the wording for this Monitoring Indicator be changed to: “95% of permitted and completed class B1c, B2 and B8 floorspace on the Industrial Strategic Employment sites, and sites where these use classes are included in site allocations within the Local Plan.”</p> <p>Target for small business units amended to 50%.</p>

<ul style="list-style-type: none"> Concern that draft policy E2 may be in conflict with the proposed strategic allocations, including the Wisley new settlement, which make provision for B Class employment, on-site. Clearly, for proportional employment in excess of 200 sq m, new strategic allocations are sequentially preferable sites. The draft policy should be amended to ensure that it is effective and consistent with the overall GBLP. 	<p>The wording of both the first and second paragraphs of the policy have been amended to clarify the sequential approach and to clarify that all site allocations are not subject to the sequential test.</p>
<ul style="list-style-type: none"> Objection to paragraph 4.4.18 of the Plan, which makes reference to: "The bus station in Guildford town centre is defined as a public transport interchange. When it is replaced on site or by a suitable alternative arrangement to be located either partly or wholly on or off site these will be defined as a public transport interchanges." There is no scope to replace the existing bus station on site. 	<p>The wording of Policy E2, paragraph 4.4.18, has been carefully considered. Given the current position with the site, the Council considers it appropriate to retain the flexibility the wording offers.</p>
<ul style="list-style-type: none"> Include an additional bullet point within the draft policy, under bullet point 2: <i>Proposed local centres or defined employment locations within proposed strategic site allocations, as outlined in Table 1 and the Proposals Map".</i> 	<p>The wording of both the first and second paragraphs of the Policy have been amended to clarify the sequential approach and to ensure all site allocations are included.</p>
<ul style="list-style-type: none"> Regard Policy E2 (relating to the location of new employment space and the sequential test) to be flawed and recommends that the Research Park be treated in the same way as the Town Centre. 	<p>The wording of both the first and second paragraphs of the Policy have been amended to clarify the sequential approach and to ensure all site allocations are included.</p>

E3: Maintaining employment capacity

Main Issue	Guildford Borough Council Response
<p><i>Representations on Specific Issues</i></p>	
<ul style="list-style-type: none"> • Object to resisting change of use from B1a to residential: <ul style="list-style-type: none"> • Opposes regeneration of brownfield land. • Contrary to the concept of brownfield first for residential development schemes. • Puts unnecessary obstacles in the way of using brownfield land into useful residential housing, • Contrary to the concept of integrated mixed use communities whereby the journey to work is minimised. • Guildford is in dire need of increasing town centre residential development. • Contrary to current government policy. • 30/50 year old office buildings are not energy compliant - illegal to occupy for employment purposes and the cost of refurbishment makes them redundant and uneconomic. • Places an unnecessary level of restriction in proposing to place significant restrictions on the loss of floorspace outside of “designated employment sites”. 	<p>Certain types of work can be undertaken without the need to apply for planning permission. These are known as "permitted development rights" and they derive from a general planning permission granted not by the local authority but by Parliament. The requirements set by the Local Plan do not remove what is set out in Class O – offices to dwelling houses of the Town and Country Planning (General Permitted Development) (England) Order 2015.</p> <p>The Local Plan is required to meet all identified needs. The loss of B1a to residential can negatively impact upon meeting employment needs. It is therefore appropriate to protect existing B1a uses subject to meeting the criteria within Policy E3.</p>

<ul style="list-style-type: none"> • There are a number of vacant office blocks that could be converted to residential, as demand does not appear to be for commercial occupancy. 	<p>The Local Plan cannot prevent changes of use from offices to residential uses taking place, as this type of development can now be refused only on certain grounds in line with national legislation. The Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2016 introduced a permanent permitted development right for offices to be converted to residential use under Class O without the need for planning permission. The proposed marketing requirements of Policy E3 would therefore apply to the conversion of B1 (a-c), B2 and B8 employment floorspace to non-residential uses only.</p> <p>Policy E3 prevents the loss of offices unless a developer has first undertaken active and comprehensive marketing of the site for its current use. It would run counter to this policy to allocate additional existing employment sites for residential uses that may be reoccupied or redeveloped for another employment use in future. The Council has already undertaken a comprehensive review of potential sites through its Land Availability Assessment and other studies (e.g. Sustainability Appraisal, Strategic Flood Risk Assessment) and has allocated all of the sites for residential uses that it considers suitable, available and achievable in the period covered by the Local Plan. In relation to availability, if an office block is vacant and not subject to a planning application, or prior approval application, it does not necessarily mean that it is available, as it may have ownership, lease or other issues that restrict potential redevelopment opportunities.</p>
<ul style="list-style-type: none"> • Policy E3 goes too far and does not reflect the guidance set out at paragraph 22 of the NPPF. The subtext, paragraph 4.4.25 refers specifically to the loss of office space as a driver for retaining employment land, however, the Council should consider other more specifically targeted mechanisms to protect office space e.g. Article 4 direction. 	<p>Consideration will be given to bringing forward an article 4 direction to protect specific sites in the borough.</p>

<p><i>Evidence base:</i></p> <ul style="list-style-type: none"> Evidence base (Employment Land Needs Assessment 2015 and the Guildford Borough Economic Strategy 2013-31) as flawed and inconsistent and therefore unreliable evidence. 	<p>This point is addressed in detail elsewhere.</p>
<p><i>Proposed text changes:</i></p> <ul style="list-style-type: none"> Within Policy E3, any change of use on a strategic employment site has to be backed up by marketing "<i>for a continuous period of at least two years</i>". This effectively is discretionary by virtue of the words "<i>at least</i>". The Borough Council are, therefore, in total control, whether this is 3, 4 or indeed 5 years or indeed even more. The words "<i>at least</i>" should be removed. <p>Same with locally significant - "<i>at least</i>" should be removed.</p>	<p>Whilst two years of marketing is considered to be a sufficient period for the majority of sites that may come forward, the policy allows for circumstances where a very large part of a strategic site may come forward for redevelopment and a marketing period in excess of two years would be appropriate given the potential significance of such a loss of employment floorspace.</p>
<ul style="list-style-type: none"> Limited to B1(a), B1(b), B1(c), B2 & B8. In reality, multiple Planning Applications each year for sui generis uses – e.g. car showrooms in Slyfield. Their loss from their technical use of employment land to the sui generis use, does not, create issues. The buildings are likely to be capable of re-use for alternative employment uses in the future and this requires to be dealt with under the Local Plan. 	<p>Sui generis uses by definition do not fall within any of the specified use classes. It is considered appropriate that these applications are dealt with on a case-by-case basis and not by a strategic policy.</p>
<ul style="list-style-type: none"> "Evidence of active marketing", there is a requirement to offer premises at a competitive rate and a reasonable market rate. Who decides what is competitive and what is a reasonable market rate? The Borough should also bear in mind that owners of buildings will very often have mortgages where the lender's view and the Borough's view may be at odds. Requirement to demonstrate - flexibility in space offered, including dividing up larger areas of floor space where this is possible and making alternative layout. This is draconian as a policy. Given how restrictive and demanding this Policy is, it should be very carefully considered in terms of implications. 	<p>A new appendix (A2) has been added to set out further detail on the marketing requirements which apply across several policies in the plan. More detail and a checklist will be set out in a Supplementary Planning Document.</p> <p>The text regarding dividing up larger areas does state "where this is possible and practical" which clarifies the policy will not be applied unreasonably.</p>

<ul style="list-style-type: none"> Policy 4.4.31 advises that "employment floor space would be protected and the release of existing sites would be managed". The word managed has huge implications. Firstly, please advise how the Borough intends to manage the release of sites, as this implies a controlled process and also it advises that the Borough Council will ensure, by this management, that there is sufficient supply to accommodate existing and future demand. We do not believe that the Borough Council has the ability to do this and would wish to understand what their proposals are. 	<p>This text has been deleted. Additional amendments have been included to provide clarity.</p>
<ul style="list-style-type: none"> Para 4.4.32 advises that "<i>there is no specific guidance on an appropriate period for marketing...</i>". The Policy on the previous page no. 70 does give specific guidance on the appropriate period of marketing and we feel that this clause is, therefore, contradictory. 	<p>The word "national" has been added so the text reads "There is no specific <i>national</i> guidance on..."</p>
<ul style="list-style-type: none"> The policy should make it explicitly clear that these restrictions should not apply to any Site Allocations. <p>The third bullet point of Policy E3 relating to employment floorspace outside designated employment sites should be reworded as follows (our additions):</p> <p><i>"Employment floorspace will be protected in line with latest needs assessment and the loss be resisted outside designated employment sites, unless the site is allocated for an alternative use. Change of use will only be acceptable if evidence is provided of active and comprehensive marketing of the site for its current use (offices, research and development or industrial) for a continuous period of at least 12 months. If the site is allocated for an alternative use within the Local Plan, the marketing period is not required"</i>.</p>	<p>Each of the site allocations makes clear what type and scale of development is allocated. This establishes the principle of development for the site. It is not considered necessary to make explicit the point being made, as allocations within the plan would not require justification of marketing evidence for the loss of existing commercial floorspace.</p>

E4: Surrey Research Park

Main Issue	Guildford Borough Council Response
<i>Representations on Specific Issues</i>	
<ul style="list-style-type: none"> No need to expand the Research Park into a larger Business Park. <p>Object to expansion of the Research Park into a larger /more general Business Park.</p> <p>Should maintain and enhance the integrity of its research base allowing for the economic value add to the local economy of knowledge and technology transfer from the University.</p> <p>Believe that B1b should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park.</p> <p>Waters down research purpose of park, turning into a general business park.</p>	<p>Policy E4 is carefully worded to protect the use of the Research Park and ensure business use is complementary to the activities of the University of Surrey. This is the same wording that has been applied to planning applications on the Research park since its development.</p>
<ul style="list-style-type: none"> Object to the inclusion of B1c uses which is inappropriate and unnecessary. 	<p>B1c use has been permitted on the Research Park since its development, and currently some B1c activity takes place on the Park. For example, Surrey Satellite provide complete in-house design, manufacture, launch and operation of small satellites. It is not anticipated that B1c activities will proliferate but they can be appropriate and necessary.</p>

<ul style="list-style-type: none"> Subordinates public planning policy to the University of Surrey's private, commercial enterprises (not its public academic purpose). 	<p>The ELNA identifies the need for new employment floorspace for use classes B1, B2 and B8 over the plan period. Guildford town centre remains our preferred location for B1a development. However, only a limited number of sites have been identified as likely to come forward for development over the plan period. This has resulted in having to search a wider area.</p> <p>The Employment Topic Paper and both the introduction and reasoned justification of policy E4 sets out the importance of Surrey Research park to the Guildford economy. The site at Blackwell farm has provided an opportunity to extend the Research Park. Although a large amount of the B1a/b1b floorspace will be focused on this site, others will also provide new floorspace as set out in the plan. B1a/B1b space will also be delivered at Gosden Hill, The Pirbright Institute, Surrey Satellite (outstanding planning permission), Former Wisley Airfield and on the new site at Send Business Park.</p>
<ul style="list-style-type: none"> The University notes that para 4.4.41 refers to 35,000 sq m of employment land in total at the site, of which 30,000 will be in the plan period. However, policy A26 now refers to only 30,000 sq m in full. 	<p>Text amended in site allocation to reflect Policy E4.</p>
<ul style="list-style-type: none"> B1 b research and development space needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub. 	<p>The Policy provides sufficient flexibility to enable the Research Park to retain its character and continue to enhance its reputation and its links with the University.</p>
<ul style="list-style-type: none"> Given the scarcity of land in Guildford it is not the place for large space hungry businesses. Should target high added value small and medium sized enterprises rather than the headquarters of larger corporations. Need to promote the idea of new knowledge transfer in incubator units and small premises for new start up enterprises. They need to be on the wave of innovative new technology as opposed to older established businesses. 	<p>The proposed expansion will provide a variety of different sized units and the policy sufficiently addresses meeting the needs of start-up companies.</p>

<ul style="list-style-type: none"> Part 1 of Policy E4 restriction is potentially overly restrictive and inflexible. This is considered to particularly be the case for those businesses operating on the existing SRP, some of whom have been in place for a number of years and who require the flexibility to amend or expand their operations in response to their particular corporate requirements. Whilst the existing flexibility of criterion (3) is appreciated, it is considered that the policy would best be reformulated to be more reflective of the differences between the needs of existing established businesses operating from the SRP, and the new businesses which would be attracted to the SRP extension. 	<p>The Policy does provide criteria for exceptions for proposals that do not meet the criteria as stated in paragraph 1. Each application will be considered on its own merits and it is not considered necessary to differentiate between existing companies and new companies in the policy wording itself.</p>
<ul style="list-style-type: none"> B1b should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. I also object to the inclusion of B1c light industrial uses which is inappropriate and unnecessary. 	<p>The Policy provides sufficient flexibility to enable the Research Park to retain its character and continue to enhance its reputation and its links with the University.</p>
<p><i>Density:</i></p> <ul style="list-style-type: none"> Increase the density of development on the existing research park rather than expanding – currently very density plot (25%). The majority of existing buildings are 2 storeys giving a developed floor space plot ratio of only 12.5%. <p>University surface car parking could be located below ground and office and accommodation could be provided above. The existing Research Park has acres of surface car parking, which provides it with the opportunity to markedly increase its density without infringing any Green Belt land nearby.</p> <p>Support the Research Park and its specialism, object to the current need to expand. Utilise the land hungry current ground level parking for Research Park employment development and build shared multi-storey or underground parking. Ensure all new Research Park development includes underground car parking, as in other countries.</p>	<p>The issue of density and car parking is addressed in the Employment Topic Paper (paragraph 4.95 onwards). The relative low density of the business park is an important part of its character and attraction.</p>

Monitoring:

- Should include
 - new start-ups
 - new patents created

To monitor this policy there is a need to include the definition of “research that is complimentary to the activities of the University of Surrey” from the original outline planning permission or to define what ‘complementary to the activities of the University of Surrey’ means in terms of Standard Industrial Classification (SIC) Codes.

Monitoring must be undertaken by the Planning Policy team. Information will be gathered in a combination of three methods;

- i) Directly by the Planning Policy team, through site visits to assess retail units for example,
- ii) Data which is sent to the Council, on building commencements/completions for example, or
- iii) Published data, such as data produced on business start-ups & survival rates by the Office for National Statistics. (However, the lowest level this data is available is by Borough, so it would not be possible to isolate the Surrey Research Park in this example).

Although the Intellectual Property Office publishes data on patents, the first part of the Post Code is not attached to all applications. This does not provide enough information to provide analysis for the Research Park. Additionally, it is not known whether applicants always use their business address, rather than their personal address, when applying for patents.

The University support this policy and will therefore play a part in ensuring that new development is consistent with its aims. For monitoring purposes, the extent to which it is considered complementary to the activities of the University will be assessed on a case by case basis.

E5: Rural economy

Main Issue	Guildford Borough Council Response
<p>Representations on Specific Issues</p>	
<ul style="list-style-type: none"> Object to the loss of rural employment on allocated sites. 	<p>Policy E5 seeks to support economic growth in rural areas, to create jobs and prosperity and promote a strong rural economy. The policy itself is not intended to be used to object to site allocations contained within the Local Plan. Those allocations are made in light of the existing uses on the sites and the allocations are considered to represent sustainable development and deliver development to meet identified needs.</p>
<p>Broadband:</p> <ul style="list-style-type: none"> Support the proposal for high speed broadband but are disappointed that the previous reference to this specifically “Provision and take-up of reliable and high speed broadband has been a Main Issue reported by rural businesses. Access to key services vital for economic growth is often poor in rural areas. Slow broadband and inadequate and slow mobile phone coverage are constraints to economic development” has now been modified to refer only to “provision of internet services where needed in rural areas and enhance digital inclusion in such areas”. This must be modified to read “<i>provision of high speed internet services and reliable mobile phone coverage to all rural areas etc</i>”. In the prior consultation, a matter that was warmly welcomed by most respondents has now been significantly weakened. Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This is disregarding the responses from the previous consultation. 	<p>The wording of Policy E5 concerning broadband has been carefully considered, given that the Local Plan is a strategic document, delivered by the local authority.</p> <p>The Draft Local Plan contained ‘Policy 9: Villages and major previously developed sites’. The Policy itself made no reference to broadband. However, the supporting reasoned justification highlighted the issue of provision and take-up of reliable and high-speed broadband for rural businesses in paragraph 4.118.</p> <p>The Proposed Submission Local Plan (2016) contained ‘Policy E5: Rural economy’ that provided the commitment; “<i>The Council will work with our partners at Surrey County Council and the Enterprise M3 LEP to support and improve the provision of internet services where needed in rural areas and enhance digital inclusion in such areas. This will help to retain and promote services and types of business, including traditional agriculture, and help to create more sustainable villages</i>”. Further information is provided in paragraph 4.4.51 of the reasoned justification.</p> <p>However, representations seem to have regarded this as reduced</p>

	<p>support for the provision of rural broadband. Some text has been added to paragraph 4.4.51 of the reasoned justification to clarify the Council's support.</p> <p>The term "Minimum acceptable speeds" is considered too vague, as the meaning of this standard will vary a great deal for different users.</p>
<ul style="list-style-type: none"> Concern at the absence of policy protection in the Plan for existing well established local light industry and employment uses to higher value residential development. This is particularly significant in rural areas, where the relationship between small scale industry operated by local people is a long term process which, once lost may take very long periods to recover. Many such industries and employment uses are often forced to re-locate to the urban area where they may not be viable. The local connection, once lost is often irreplaceable. 	<p>Policy E3 provides protection for employment floorspace against the typically higher land values associated with residential development.</p>
<ul style="list-style-type: none"> Concern about the emphasis on accepting agricultural developments regardless without consideration for their impact on the natural environment. 	<p>Agricultural buildings are not inappropriate in the green belt. However the policy makes it clear that such development should be well designed, appropriate in scale and in accordance with Green Belt and other policies in the plan. Policy P1: Surrey Hills Area of Outstanding Natural Beauty (AONB) covers the treatment of the Surrey Hills AONB.</p>
<p><i>Main town centre" uses:</i></p> <ul style="list-style-type: none"> Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism that require local people to be consulted and heeded, not ignored. Villages need protecting in terms of both design and scale. Many of the proposed "main town centre" uses would not be appropriate either to the Green Belt or villages within it - indoor bowling, casinos, warehouses etc. would not be appropriate for most villages in Surrey. 	<p>Policy E5 has been drafted in accordance with the NPPF. Paragraph 25 of the NPPF states: "This sequential approach should not be applied to applications for small scale rural offices or other small scale rural development". The NPPF does not define 'small-scale'. The Definitions supporting Policy E5 specify that 'small-scale' in Guildford borough refers to developments of less than 100 sq m.</p> <p>The NPPF defines that main town centre uses include retail; leisure, cinemas, restaurants, bars and pubs, night-clubs, casinos, bingo halls;</p>

	<p>offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities). However, the non-application of the sequential test only applies to development of less than 100 sq m. It is very unlikely that many of these facilities would be developed at such a small scale.</p>
<ul style="list-style-type: none"> • Many farms are being taken over by light industrial units that can be inappropriate for the area this needs to be clearly defined. 	<p>Often the change of use of agricultural buildings can take place under permitted development rights. There are 3 main uses to which an agricultural building can change under permitted development rights:</p> <ul style="list-style-type: none"> • flexible use • educational use • residential use <p>There are size thresholds, limitations and conditions associated with the rights.</p> <p>Subject to a number of conditions and restrictions, agricultural buildings and land in their curtilage may convert to a “flexible use” under Class R. Flexible use means any use falling within Class A1 (shops), Class A2 (financial and professional services), Class A3 (restaurants and cafes), Class B1 (business), Class B8 (storage or distribution), Class C1 (hotels) or Class D2 (assembly and leisure) of the Schedule to the Town and Country Planning (Use Classes) Order 1987.</p> <p>The size thresholds, limitations and conditions are set out at Class R of Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015.</p>
<ul style="list-style-type: none"> • The loss of agricultural land is to be avoided; food security is an increasingly important factor in a congested island with an increasingly population based in the temperate zone so that it can supply food without climate stress; as noted by Cambridge University we will need more food producing land, not less, over the next few decades (see study attached to previous submission, disregarded). 	<p>Policy E5, point (3) has been added to clarify the position on the protection of agricultural land.</p>

<p><i>Add text:</i></p> <ul style="list-style-type: none"> • “In considering whether employment generating development might assist the rural economy in the AONB/AGLV account will be given to the degree to which the development would contribute towards supporting local community facilities and the continued viability of the agricultural landscape. New employment not assisting the well-being of local communities but generating jobs likely to be occupied by those needing to commute by private car and along unsuitable rural lanes, will be avoided. Employment generating development that would not conserve landscape and scenic beauty will not be permitted.” 	<p>Policy P1: Surrey Hills Area of Outstanding Natural Beauty (AONB) covers the treatment of the Surrey Hills AONB.</p>
<p><i>Monitoring:</i></p> <ul style="list-style-type: none"> • Inappropriate that a monitoring indicator is net additional employment <i>floorspace</i> completed by category. “Smart” and home-working do not involve incremental floorspace and to evaluate incremental economic growth by the size of floorspace allocated is an inappropriate measure in the Green Belt. By definition such work uses do not require space. 	<p>No alternative indicators are proposed.</p> <p>Monitoring indicators have to be practical to monitor. Most home-working does not require planning permission so will not come to the attention of the planning department. To the best of our knowledge, no information is published on the number of home-workers annually.</p>

E6: Leisure and visitor experience

Main Issues	Guildford Borough Council Response
<i>Representations on Specific Issues</i>	
<ul style="list-style-type: none"> • Need to enhance river landscape/make more appealing. 	<p>Policy is designed to promote and protect attractions, heritage and natural features. Policy D4 provides detailed consideration in relation to the character and design of new development, ensuring that all development integrates well with natural features such as the river.</p>
<ul style="list-style-type: none"> • Plan should rule out development of scarce rural hotels (e.g. Thatchers, East Horsley). 	<p>Policy seeks to protect hotels subject to stated criteria. Thatchers hotel was previously allocated as a housing site, but this has been deleted from the consultation plan 2017 and it is now protected as a hotel use by Policy E6.</p>
<ul style="list-style-type: none"> • Policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable, much tourism depends on the undeveloped nature of green belt 	<p>The Plan should be read as a whole. The policy is not inconsistent with the protection of Green Belt or any other open space. Protection of existing character runs through many policies in the Plan.</p>
<ul style="list-style-type: none"> • Sport England objection that the policy has not been amended to clarify that it relates to outdoor sports facilities as well as indoor facilities as highlighted in our response dated 8 July 2016. Sport England therefore maintains its objection on this basis. 	<p>Outdoor sports facilities are protected under Policy ID4 and the NPPF.</p>
<ul style="list-style-type: none"> • The 18-month period specified for marketing, in order to demonstrate that a use is unviable, is unnecessarily onerous and not in keeping with National Policy relating to the need to regularly review land allocations, and to have regard to market signals in determining applications to alternative uses of land. A figure of between 6 – 12 months would be considered more appropriate to demonstrate an unviable use. 	<p>The Council consider that 18 months is an appropriate period of marketing.</p>

<ul style="list-style-type: none"> Hotels function across a wider geographical area than the Borough as is demonstrated by the Council's Evidence base. The Surrey Hotel Futures Report addresses the sector across the entire County and the need or otherwise for a hotel to be retained should be based on a similar analysis and not restricted to the geographical boundaries of the Borough. <p>The Policy effectively requires that a replacement facility be provided in order to facilitate the loss or redevelopment of an existing hotel. However, this approach assumes that a duplicate facility is necessary and fails to take into consideration the existing provision across either the Borough or County. Where sufficient capacity exists, a replacement facility should not be required. The approach set out in the policy is not supported by the evidence base.</p>	<p>The wider geographic area is relevant to several types of leisure and visitor attraction including hotels and ice rinks. The policy wording provides applicants with the opportunity to put forward robust evidence that demonstrates; i) there is no longer a need for the existing facility or an alternative leisure or visitor use, ii) the existing use is unviable, and iii) its retention has been fully explored.</p>
<ul style="list-style-type: none"> The Surrey Hotel Futures Report addresses the sector across the entire County and the need or otherwise for a hotel to be retained should be based on a similar analysis and not restricted to the geographical boundaries of the Borough. The Policy effectively requires that a replacement hotel facility be provided in order to facilitate the loss or redevelopment of an existing hotel. However, this approach assumes that a duplicate facility is necessary and fails to take into consideration the existing provision across either the Borough or County. Where sufficient capacity exists, a replacement facility should not be required. The approach set out in the policy is not supported by the evidence base. 	<p>The Council contends that the text in paragraph (3) of Policy E6, specifically bullet points (a) and (b) provides enough scope for an applicant to be able to prove that a hotel facility is not required. The Surrey Hotel Futures report highlights a need for all types of hotel accommodation in the borough. It is therefore appropriate that: alternative leisure or visitor uses are first considered on or near the site; the existing use is demonstrated to be unviable; and retention is fully explored before an application is made that would result in the loss of such facilities.</p>

E7: Guildford Town Centre

Main Issue	Guildford Borough Council Response
<p><i>Representations from Prescribed Bodies and Selected Stakeholders</i></p>	
<p>Heritage England</p> <ul style="list-style-type: none"> Broadly support both the Vision and policy for the town centre. A key characteristic of, and a significant factor in its success is the historic environment, focussed on the setted High Street, and the range and concentration of heritage assets. However, also important to proactively sustain these and integrate their protection and enhancement into efforts to improve the retail and associated town centre offer. <p>The wording of the policy should be strengthened in this respect; for instance, by the addition of an additional bullet point to this effect in the first paragraph of the policy or by explicitly connecting this policy to Policy D3.</p>	<p>Policy E7 is an Economy policy, rather than a Design policy. Design and Heritage are covered elsewhere within policies D1, D3 and D4 and it is not necessary or helpful to cross-reference these policies. Additional wording has been added to the section on Policy E7 Guildford Town Centre (paragraph 4.4.67 and 4.4.68) to reference the historic character of the town centre and its range and concentration of heritage assets. An additional sentence has also been added (paragraph 4.4.74) to state that we will ensure the public realm is enhanced and insist that all new development is of the highest design and environmental standards.</p>
<p><i>Representations on Specific Issues</i></p>	
<ul style="list-style-type: none"> No need for so much additional retail floorspace, as retailing is a declining industry, with changes to shopping patterns, including increasing internet sales, will reduce future need. 	<p>The Retail and Leisure Study Addendum (2017) took account of the increase in Internet trading within Appendix 10. The Study indicates that despite the 16.2% increase in Internet sales since 2015, many of the multiples and traditional high street retailers are actively seeking larger format bricks and mortar retail units to showcase their full product range. In addition, Guildford town centre is already very successful and has the “critical mass of retail, leisure and other uses to compete for more limited investment and development” (paragraph 1.35). The town centre ranked 11 in the top 500 British retail centres for vitality in 2014 and was ranked second among the top 5 centres in the South East, after the Bluewater centre in Stone, Kent. (Source: http://www.costar.co.uk/en/assets/news/2014/October/The-UKs-most-and-least-vital-retail-centres/).</p>

<ul style="list-style-type: none"> The policy does not reflect the Town Centre Vision or Master Plan 	<p>The Policy does not need to reflect the Town Centre Vision or Master Plan. However, we have deleted the Vision from the document in the interests of ensuring clarity of purpose for this part of the document.</p>
<ul style="list-style-type: none"> The policy needs far more housing in town centre as the most sustainable location, with the best services, infrastructure and most brownfield land, so helping to keep housing away from rural areas, and avoiding harm to the countryside. Town centre land should be used for new housing and not commercial. 	<p>Policy E7 is fully compliant with the NPPF guidance. The NPPF prioritises the sequential development of commercial and other main town centre uses in the town centre in order to ensure their vitality and economic viability. These uses include retail development, leisure, offices, arts and tourism development, among other uses. The NPPF also places emphasis on utilising suitable and available brownfield sites before greenfield sites, which the Submission Local Plan has done by allocating a number of town centre sites for residential uses, either on their own or as part of mixed-use schemes. These sites amount to approximately 1,285 additional homes (gross).</p>
<ul style="list-style-type: none"> All publically-owned brownfield sites (including surface car parks) should be considered as available development land within the first 5 years of the plan. 	<p>The phasing of sites in the Local Plan is covered by the Land Availability Assessment (2016) and 2017 Addendum.</p>
<ul style="list-style-type: none"> The Walnut Tree Close area needs to be prioritised for housing development, where very significant numbers of homes could be provided. 	<p>Policy A13 allocates this site for 100 homes. See Housing Delivery Topic Paper for information on how the sites were selected to be allocated.</p>
<ul style="list-style-type: none"> The Policy should include the 2,551 new homes proposed by Allies and Morrison on brownfield land included in the town centre masterplan 2015. Town centre proposals should be broadly along the lines of the vision and subsequent study prepared by A&M. The reliance on a subsequent Area Action Plan is understandable but as it is not at all envisioned in the Reg19 Consultation Draft. The town centre has capacity for 4,000 - 5,000 homes. 	<p>The Town Centre Masterplan was an aspirational document and not necessarily deliverable. It did not treat issues such as flooding, ownership and leases as constraints.</p> <p>The proposed housing numbers and approach to housing delivery in the Local Plan is more realistic and takes account of these constraints as well as the evidenced need for retail and other main town centre uses on sites within the town centre.</p>
<ul style="list-style-type: none"> Policy is “unsound” as there is a lack of ambition and aspiration in respect of the town centre; its proposal are inadequate, including the sustainable transport corridor. 	<p>Ambition and aspiration need to be considered alongside deliverability as set out in the NPPF.</p>

<ul style="list-style-type: none"> No comment on the reason for the reduction in floorspace. However, the reduction in the quantitative floorspace need available and the way the policy is worded suggests that this should all go to the North Street regeneration site. However, we do not believe this is the intention as paragraph 4.4.81 only refers to the 'vast majority of the retail floorspace'. Therefore, this should be clarified. <p>The need for additional retail floorspace is driven by total growth apportioned to the town centre, once deductions for special forms of trading, improved efficiencies and commitments are taken into account. Therefore, in circumstances where the whole of the town centre could have a claim on this growth, the policy should be sufficiently flexible to enable other sites to meet some of these needs through redevelopments, reconfigurations, minor alterations of extensions.</p> <p>Therefore, we consider the policy does not reflect the requirement of paragraph 23 of the NPPF (sixth bullet) that requires local planning authorities to allocate a range of suitable sites to meet the scale and type of retail (and residential) development in town centres.</p> <p>It is also noted that the distribution of homes to the town centre is increased from 1,172 to 'approximately 1,300 new homes, particularly on upper floors as part of mixed use developments'. Consistent with amendments to the Vision, this should be a minimum rather than an approximate figure.</p>	<p>The Council does not consider that the policy wording does imply that all of the proposed retail development should be on the North Street site, although it is likely that the majority of it will be. This is made clear in paragraph 4.4.79, as the respondent has mentioned. The Policy is sufficiently flexible to allow additional retail development to come forward on other sites in the town centre. However, the North Street site (site A6) is particularly appropriate for a major mixed-use redevelopment and has therefore been specifically allocated for a minimum of 41,000 sq m gross comparison floorspace. The Retail and Leisure Study (2014), which has been updated by the Retail and Leisure Study Addendum (2017), provides up-to-date evidence of future need and capacity that supports this amount of retail development in the town centre. Retail development and other development that generates a large number of trips are encouraged in the town centre in Policy E7 paragraph 4.4.73, and in paragraph 23 of the NPPF.</p> <p>The amount of residential development allocated in the town centre has increased from the 2016 version of the Plan. However, it was considered more appropriate to allocate a minimum retail floorspace figure for the town centre and to leave the allocated residential figure as approximate, rather than definitive, as this would allow a higher amount of retail and/or leisure development to come forward. National guidance states that town centres should be the sequentially most preferable location for retail development; therefore, we feel that the proposed retail and leisure floorspace figures in Policy E7 should not be diluted by other uses that do not contribute to the town centre's liveliness and economic vitality.</p>
<ul style="list-style-type: none"> The changes to Policy E7 still fail to provide Guildford town centre with a safe, pedestrianised environment which is free from traffic (and its noise and air pollution and dangers) and makes the most of the riverside (currently buried under the concrete and tarmac of the gyratory system created by GBC. 	<p>See GBC response to highway traffic mitigation concerns in Appendix D and Q1 – Transport. Also, refer to Transport Topic Paper (2017).</p>

- There is no reliable evidence provided that the retail core of the Town Centre needs or can be expanded by 41,000 sq m of retail space at North Street because of lack of demand for retail units in the Town Centre particularly large units. This is due to falling demand for retail space in Guildford and town centres throughout the country evidenced by independent research and the reality of empty shops in many high streets (including Guildford) and the accelerating competition from internet shopping.

The recent Carter Jonas Study Retail Study 2017 update predicts total demand for Guildford Town Centre by 2020 at only 3,313 sq m and only 34,811 sq m by 2036. We have now been waiting some 15 years + for demand to catch up to enable development of North Street where the old consent for some 40,000 sq m of retail had to be renewed because it was getting out of date.

In table 2 Appendix 6 there is potential for turnover to reach £856.3m in the town centre by 2020 however actual committed floorspace take up accounts for only £1.3m of this. This is 0.15%. It is hardly surprising that there are no details of take up or real demand evidence given anywhere in the report.

"For comparison goods, we have assumed the same estimations for convenience goods expenditure 'inflow' (10%) for Guildford Town Centre, again based on the centre's role as a popular shopping and visitor destination." Coming to the vague conclusion that Guildford is popular is far from reliable property market research!

In their 2014/2015 reports Carter Jonas provided a fairly inaccurate picture of retail demand (originally Appendix 6) with the inclusion of retailers who had either gone bust or

The Carter Jonas Retail Study update (2017) provides evidence of continued strong demand for retail space in Guildford town centre, despite the 16.2% increase in Internet sales since 2015. Across the study area, which includes zones 1a-8, 12.9 % of comparison goods are purchased online. In zone 1, which includes the largest part of the borough, this is 10.3%, which is a low proportion. This is likely to be lower if we allow for SFT (special forms of trading) sales sourced from traditional bricks and mortar stores. 73.2% of total market share for comparison goods is retained within the borough (see Appendix 4, Table 1).

Guildford town centre is among the top shopping destinations outside central London, in addition to being the most popular retail centre in Surrey. This places Guildford town centre under less pressure than other centres to diversify its retail and leisure offer to continue to attract visitors. The approach of allocating a town centre site for new modern shopping units is also likely to appeal to larger retailers that operate multi-sales formats such as 'Click and Collect'. This large-floorspace format store in an area with strong catchment is in line with the demand indicated by research, as the retail study update highlights.

The North Street site is allocated for a minimum of 41,000 sq m comparison retail floorspace. This is likely to include a new anchor retail store of between 11,000 and 18,000 sq m. The Submission Local Plan allocates this site for delivery any time during the Plan period, although it is predicted to come forward within 5-10 years from adoption. The floorspace allocated is considerably higher than the existing retail floorspace commitments in Appendix 7, as they are comprised of current planning applications which do not include the North Street site or other town centre sites that are not yet subject to a planning application. Previous planning application history demonstrates that the North Street site has the capacity to accommodate this floorspace, and it is of a size that could enable larger retailers to locate within the borough, further increasing this

<p>actually specified demand requirements in centres other than Guildford. This I note has now been deleted presumably because of its inaccuracies which were dealt with in my 2016 objection and has not been updated. We are now left with no demand assessment from either small, medium sized or large retailers.</p> <p>The reality is that the town centre has enough retail floor space. If more is introduced it will result in the closure of existing shops particularly in locations which are less than 50% of peak Zone A or 100% positions. What Guildford needs is a new focus on speciality high quality comparison shopping supported by a revival of Guildford's attractive heritage core and a new major visitor attraction supported by restaurants. Guildford needs to become the quality shopping destination for Surrey.</p>	<p>area's attraction to shoppers relative to other competing shopping destinations.</p> <p>Planning permissions for retail-led development do not lapse solely for the reason that there may be a lack of retailer or consumer demand; often there are a number of other unrelated reasons. In this case, the North Street site is clearly achievable. The site's key landowner, M&G Real Estate Ltd, has expressed strong desire and willingness to work with the Council in a collaborative manner to help bring forward the North Street scheme.</p> <p>Retailer requirements in Appendix 6 of the 2015 Retail Study were based on the most up-to-date snapshot of information available at that time. It is possible that some retailers may have closed down since this data was first published. The companies listed were based outside of the borough, but seeking to locate outlets within Guildford borough; most of them were seeking prime town centre locations.</p> <p>The Town Centre Masterplan was deleted from the Key Evidence box as it was an aspirational document and not necessarily deliverable. The proposed housing numbers and approach to delivery in the Local Plan takes account of constraints such as flooding, ownership and leases as well as the evidenced need for retail and other main town centre uses on sites within the town centre.</p>
<ul style="list-style-type: none"> In terms of retail space, the Local plan should be targeted to small independent local businesses. Provide large number of larger units for small businesses to rent. GBC should support small and independent retailers to maintain the heritage and distinctive character of Guildford 	<p>New larger retail development is best allocated to the town centre, in line with national guidance (NPPF paragraph 24), as this is the most sustainable location in the borough.</p> <p>An additional sentence has already been added (Policy E7, paragraph 4.4.74) to state that we will ensure the public realm is enhanced and insist that all new development is of the highest design and environmental standards.</p>

<ul style="list-style-type: none"> Object to the continued focus on retail development in the town centre, which has not been demonstrated as being necessary, rather than making use of town centre developments to provide housing close to where people work. 	<p>The NPPF prioritises the sequential development of commercial and other main town centre uses in the town centre in order to ensure their vitality and economic viability. These uses include retail development, leisure, offices, arts and tourism development, among other uses. The NPPF also places emphasis on utilising suitable and available brownfield sites before greenfield sites, which the Submission Local Plan (2017) has done by allocating a number of town centre sites for residential uses, either on their own or as part of mixed-use schemes.</p>
<ul style="list-style-type: none"> The retail allocation for North Street has not been reduced sufficiently to accommodate the desirable increase in housing. Six storeys along North Street, as required to achieve the proposed quantum of mixed use development, would have a harmful effect. The retail element should be reduced further, shops developed along North Street, a bus interchange retained and the potential for some flexible high tech business space considered. 	<p>See comment above in relation to the sequential selection of sites for retail uses. The town centre could easily accommodate a high-density mixed-use development of several storeys without undermining character or residential amenity. Any planning application for this site would also be assessed taking account of the new design policies proposed elsewhere in the plan to ensure that this is the case.</p>
<ul style="list-style-type: none"> The Guildford Society has no comment to make on the amendments to Policy E8 except to note the introduction of 'Main town centre uses' and to question whether these should not also have similar relevance to Policy E7. 	<p>Main town centre uses cover a wide range of uses as listed in paragraph 4.4.87b of the Submission Local Plan (2017), including several uses that are not Use Class A. If suitable main town centre uses were generally deemed appropriate ground floor level uses subject to tests for amenity, character and appearance, as in policy E8, then this would, in our view, represent a weakening of policy E7. Criterion (5) of Policy E7 applies to secondary frontages, which form part of the Primary Shopping Area (PSA). The wording "appropriate to a town centre shopping frontage" will allow us more scope to determine which main town centre uses are appropriate within the PSA.</p> <p>The NPPF glossary states that retail development (i.e. use class A1 uses) should be concentrated within the PSA but allows a diversity of uses in secondary frontages, including non-retail uses. It therefore seems appropriate to allow loss of Class A uses in secondary frontages, in exceptional circumstances, subject to the criteria in (4) being met and they are replaced by an appropriate alternative use.</p>

- Ensuring the night time economy is well managed and controlled through effective planning is an essential to ensure crime and incidents of anti-social behaviour are minimised. Surrey Police recommend that the evening/night-time economy should be subject to a new specific planning policy with the Local Plan, as follows:

*'Policy ?? – The Evening and Night-time Economy
The Council will welcome development that create safe, balanced and socially responsible evening and night time leisure in the Borough. An enriched mix of uses will be encouraged to achieve this including late-night shopping, cultural and theatrical activities, cafes, restaurants, pubs and bars.*

Developments linked to the evening and night-time economy will be required to implement safeguards by contributing towards public realm, public transport and other infrastructure improvements to deliver a sense of well-being, safe and security. This will involve ensuring activity is facilitated during the daytime to avoid the clustering of 'dead' frontages.

Working in partnership with the Council and other stakeholders, owners and operators of evening and night-time economy related development will be expected to take part in active management measures to help the public and support the emergency services.

If the above is achieved no development on its own, or cumulatively with other uses, will create an unacceptable impact on neighbouring uses, residents or the surrounding area by reason of noise and pollution, light pollution, anti-social behaviour, crime, disturbance or traffic. In necessary planning conditions and legal agreement will be implemented to ensure this.'

The Council feels it is unnecessary to include a policy specifically covering the evening and night-time economy in order for the Proposed Submission Local Plan to be sound. The key points within the suggested wording that could usefully be included in the Plan are already contained within a number of other proposed policies. For instance, point (1) (c) of Policy D4 requires all new developments to 'create attractive, safe and accessible places that discourage crime and disorder'; whilst point (1) of Policy E7 supports mixed-use developments including town centre uses that contribute towards the liveliness of the town centre. It also restricts development in secondary frontages (bullet point 4) in where there will be a 'loss of amenity in terms of noise, disturbance, smell, litter or traffic generation'.

The suggested requirement for owners and operator of evening and night-time economy related development to take part in active management measures is onerous for site owners/occupiers, and difficult to enforce, particularly on changes of ownership or lease. In relation to the suggestion to require developers to contribute towards public transport and other infrastructure improvements, arrangements to finance such improvements are agreed with developers on a case-by-case basis; however, they will be partly funded through the Community Infrastructure Levy (CIL) when this is adopted by the Council.

E8: District Centres

Main Issue	Guildford Borough Council Response
<p><i>Representations on Specific Issues</i></p>	
<ul style="list-style-type: none"> Horsley Village’s “Station Parade” is being described as a “District Centre”, which is used to support the case for a very large number of new houses in the vicinity. This policy is based on misleading interpretation of the facilities in the village and will make it a target for future inappropriate developments, including larger retail conglomerates. Station Parade has been inappropriately designated as a “Rural District Centre”, apparently partly because it has a “large supermarket”. The Budgens in Horsley is a small shop or convenience store (able to trade all day on Sunday) not a large supermarket (station parade). 	<p>Station Parade was designated as a new district centre in the 2003 Local Plan due to its size and catchment. It contains at least 30 non-residential units, including a Budgens supermarket and local services. There is no requirement for a centre to have a ‘large’ supermarket to qualify as a district centre – the Retail and Town Centres topic paper (last updated June 2017) refers to ‘a supermarket’, without mention of its size. Budgens is described on its website as a ‘neighbourhood supermarket’ and it is allowed to open longer hours on Sundays than larger supermarkets as it falls below the size threshold for stores that are subject to the Sunday trading law – this applies to larger shops over 280 sq m (source: https://www.gov.uk/trading-hours-for-retailers-the-law).</p>
<ul style="list-style-type: none"> There is no space in Station Parade for expansion of shops and facilities Parking is difficult in Station Parade so cannot be a district centre 	<p>Station Parade qualifies as a district centre (see response above). Parking facilities available within the district centre include:</p> <ol style="list-style-type: none"> i) Free, short-stay, on-street parking of one-hour duration outside the shops on Station Parade ii) Additional three-hour parking bays to the rear of units along the eastern carriageway of Station Parade within a Council-owned car park – Also free of charge. <p>Space available for expansion of shops and facilities in this area should not be a particular issue. The district centre has a large range of shops and services and the Council-owned car park has been identified as an opportunity to expand existing retail provision by providing a new supermarket on the site (Retail and Leisure Study, 2014).</p> <p>Should redevelopment of the Council-owned car park take place, the</p>

	<p>level of use of district centre parking would need to be considered. It is important to direct this type of retail development to district centres.</p>
<ul style="list-style-type: none"> Object to proposal to take Ripley out of the Green Belt and designated as a "District Centre". The boundary for the Primary Shopping Area is to be contiguous with the boundary of Ripley itself, opening the door to commercial development outside of the High Street. This is being done without any prior consultation and without following proper procedure, which is unacceptable. It does not consider the current paucity of parking, yet proposes to add to the burden. It will increase the traffic on the interchange with Newark lane and Rose Lane in the village centre, identified choke points. 	<p>Ripley was designated as a new district centre in the 2003 Local Plan due to its size and catchment. It contains 52 (as of May 2017) non-residential units including a supermarket and local services. The Council consulted on this as part of the Submission Local Plan consultation in June 2016, which follows the correct procedure under the Local Planning Regulations 2012.</p> <p>Site A45 is the only site that is proposed in Ripley and includes new additional retail floorspace (A1-A5 uses) as well as 26 homes. It is located within the High Street, on land to the rear of the Talbot Hotel. Ripley has free on-street parking on the High Street as well as free off-street parking in the car park at White Hart Meadows. The additional usage of public parking from the new homes proposed in this area is not considered liable to significantly increase to the point of needing to abandon the proposal to develop a limited number of new homes, shops and facilities in Ripley.</p>
<ul style="list-style-type: none"> Support identification of Ripley as a District Centre (although there are limited opportunities to expand it), subject to an amendment stating: "In order to strengthen the liveliness and economic resilience of the borough's District Centres, retail developments or <i>other suitable District Centre uses including; restaurants, takeaways, small scale offices and community uses</i>, consistent with the scale and function of that centre, will be supported in the Primary Shopping Area." The Policy should also allow flexibility for new units for a flexible range of town centre uses which will support the vitality and viability of the District centre. 	<p>The issue raised has been addressed with an amendment to Policy E8 point (3). Wording has been added following 'retail developments', to include 'other main town centre uses'.</p> <p>Note that the Primary Shopping Area applies to the whole of the district centres (or the town centre PSA), and therefore has not been referred to in this policy, as the policy applies to the area within the boundary of the district centres as a whole.</p>

<ul style="list-style-type: none"> Distinction made between district and local centres in the Local Plan is illusory, and not helpful in planning terms. Distinction could perhaps be made between village centres and urban centres. <p>The Settlement Hierarchy that sought to classify settlements by the facilities that they offered was comprehensively discredited in 2013-14, and now appears to have been downplayed to the point of invisibility in the current round of consultation.</p>	<p>The classification of the settlements listed in policies E8 and E9 is not the same as the system of classification used for the Settlement Hierarchy document (July 2013). The Retail and Town Centres topic paper (June 2016, updated June 2017) defines a district centre as including at least 30 non-residential units, including a supermarket and other local services. This definition was adopted in the 2003 Local Plan and was based on the national planning policy of the time. The 2003 Local Plan defines Local centres as containing at least five adjoining/neighbouring Class A retail units.</p> <p>The definition of District Centres could be usefully incorporated within the 'Definitions' text supporting Policy E8. This will be suggested as a minor amendment.</p>
<ul style="list-style-type: none"> Loss of public houses has a negative impact on their communities. Planning system can defend against such losses for their owners' short term financial gain <p>Campaign for Real Ale (Surrey/Hants Borders Branch) hopes that the Local Plan will include policies to support retention of community assets such as pubs, and resist applications for change of use unless there is very clear evidence that the facility is no longer wanted or needed, as in Policy E5 for rural areas.</p> <p>Need suitable protection for public houses in urban as well as rural areas, including suburbs where a whole community often have a single pub to act as the focus of the community.</p> <p>Policies for retention of pubs should be stronger and would therefore suggest adding the following to the Plan :</p> <p><i>“Applications for changes of use from A4 public houses will be resisted, unless convincing evidence can be provided to show that a public house is not economically viable. If permission is granted for a change of use, preference will be given to the premises remaining in some form of</i></p>	<p>From October 2018, the General Permitted Development Order 2017 removed the permitted development right for Class A4 pubs to change use to Class A3 (restaurants and cafes). At the same time it introduced a new class AA (pubs with expanded food provision), which is allowed to change use to class A4 and vice versa.</p> <p>However, there is still no policy in place to prevent change of use, or change of use to another use class, e.g. residential, subject to approval of a planning application.</p> <p>Should there be sufficient evidence to warrant inclusion of such a localised policy, this would need to be delivered as a development management policy in part 2 of the Local Plan, rather than as part of a strategic Local Plan policy. The suggested wording from the respondent is helpful and will be considered for possible inclusion in later policy in the Local Plan Part 2.</p>

community or employment use; as long as there are no traffic, amenity, environmental or conservation problems as a result.

If applications for a change of use of a public house are received the Council will require evidence that:

- a comprehensive and sustained marketing campaign (agreed in advance by the Council) offering the public house for sale as a going concern, has been undertaken, using an agreed valuation of the premises;
- the marketing campaign has run for a period of at least twelve months before the planning application is submitted;
- if marketing has been based wholly or partially on an alternative community or employment use, there has been prior discussion with the Council on the principle of the proposal; and
- the public house has been offered for sale locally, and in the region, in appropriate publications.”

Also would like you to consider having an SPD as neighbouring Rushmoor has, which protects public houses. This could include criteria for the assessment of applications for development proposals affecting the loss of current or former public houses.

CAMRA has produced a “Public House Viability Test” that can be used to assess the viability of pubs and help to demonstrate whether or not a particular public house is economically viable.

We fully accept that in some instances a public house may well not be sustainable, but such a decision should be made following a sound assessment of need and viability.

<ul style="list-style-type: none"> Although not objecting in total to these policies concerning District Centres and rural Local Centres, we have specific concerns. We object to the inclusion of the phrases "and other main town centre use" where it appears in both policies. <p>The definition of main town centre uses within these policy sections (paras. 4.4.87b and 4.4.92a) include an extremely wide ranging selection of activities, some of which are totally inappropriate to locations such as Station Parade and Bishopmead Parade, East Horsley. Examples include factory outlet centres, casinos, drive-through restaurants and night clubs. The fact that these uses will be "supported" by Policies E8 and E9 is a concern. The designation "retail and other main town centre uses" replaces the previous wording which simply said "retail development". The term "consistent with the scale and function of that centre" is insufficient protection against inappropriate development and the reference to "other main town centre uses" and the supporting definition of these uses should be removed.</p>	<p>The definition of 'town centre' provided within the NPPF includes district and local centres. Within these locations, main town centre uses are therefore considered appropriate. These main town centre uses are defined both within the NPPF and in paragraph 4.4.87b of the Submission Local Plan (2017). The wording in Policy E8 point (3), to support retail and other main town centre uses that are consistent with the scale and function of the centre, is therefore sufficient protection against inappropriate development. It is also important to note that there is no objective reason to restrict particular uses that fall within the main town centre uses definition.</p>
<ul style="list-style-type: none"> The specific support for both retail and 'other main town centre uses' within the Borough District Centres is supported. For clarity the Council should make it clearer what uses will be specifically supported. The definition at 4.4.87b is deemed to be largely irrelevant for the District Centres identified and accordingly it would be more realistic to set out a range of realistically deliverable uses which would logically include D Class uses and also in appropriate circumstances office use (B1a) SUPPORT subject to an amendment to the text stating: "In order to strengthen the liveliness and economic resilience of the borough's District Centres, retail developments or other suitable District Centre uses including; restaurants, takeaways, small scale offices and community uses, consistent with the scale and function of that centre, will be supported in the Primary Shopping Area." 	<p>The Primary Shopping Area is located in the town centre; therefore, we have not referred to it in this policy, which applies to district centres.</p> <p>The uses proposed in criteria (6)-(9) of Policy E8 are appropriate for district centres and the wording is of a suitable level of prescriptiveness to apply to all of the district centres. There is no need to define appropriate uses for individual centres, as we would assess any change of use planning application for its local amenity and other impacts in accordance with the full range of Local Plan policies.</p>

<ul style="list-style-type: none">• Policy E9 (10) includes a new statement on marketing (12 months etc.). Why is there no similar statement in E8?	<p>The marketing test in Policy E9 deals specifically with shops and services within local centres or isolated use class A1 units outside designated centres. These uses often provide for everyday needs for people who live too far away from a district centre or the town centre to be able to easily access alternative facilities. As district centres, by definition, contain a minimum of 30 non-residential units including a supermarket, they typically already cater sufficiently for meeting the everyday needs of local residents.</p>
<ul style="list-style-type: none">• The addition of the word retail removes all other impact. It is essential in my view that a traffic and transport assessment be included.	<p>This point is adequately covered in Policy ID3, which requires a Transport Statement or Transport Assessment for all new development that will generate significant amounts of movement. It also requires submission of a Travel Plan proportionate to the size of the proposed development.</p>

E9: Local Centres

Main Issue	Guildford Borough Council Response
<p><i>Representations on Specific Issues</i></p>	
<ul style="list-style-type: none"> Loss of public houses has a negative impact on their communities. Planning system can defend against such losses for their owners' short term financial gain <p>Campaign for Real Ale (Surrey/Hants Borders Branch) hopes that the Local Plan will include policies to support retention of community assets such as pubs, and resist applications for change of use unless there is very clear evidence that the facility is no longer wanted or needed, as in Policy E5 for rural areas.</p> <p>Need suitable protection for public houses in urban as well as rural areas, including suburbs where a whole community often have a single pub to act as the focus of the community.</p> <p>Policies for retention of pubs should be stronger and would therefore suggest adding the following to the Plan :</p> <p><i>“Applications for changes of use from A4 public houses will be resisted, unless convincing evidence can be provided to show that a public house is not economically viable. If permission is granted for a change of use, preference will be given to the premises remaining in some form of community or employment use; as long as there are no traffic, amenity, environmental or conservation problems as a result.</i></p> <p>If applications for a change of use of a public house are received the Council will require evidence that:</p> <ul style="list-style-type: none"> a comprehensive and sustained marketing campaign (agreed in advance by the Council) offering the public 	<p>From October 2018, the General Permitted Development Order 2017 removed the permitted development right for Class A4 pubs to change use to Class A3 (restaurants and cafes). At the same time it introduced a new class AA (pubs with expanded food provision), which is allowed to change use to class A4 and vice versa.</p> <p>However, there is still no policy in place to prevent change of use, or change of use to another use class, e.g. residential, subject to approval of a planning application.</p> <p>Should there be sufficient evidence to warrant inclusion of such a localised policy, this would need to be delivered as a development management policy in part 2 of the Local Plan, rather than as part of a strategic Local Plan policy. The suggested wording from the respondent is helpful and will be considered for possible inclusion in a later policy in the Local Plan Part 2.</p>

house for sale as a going concern, has been undertaken, using an agreed valuation of the premises;

- the marketing campaign has run for a period of at least twelve months before the planning application is submitted;
- if marketing has been based wholly or partially on an alternative community or employment use, there has been prior discussion with the Council on the principle of the proposal; and
- the public house has been offered for sale locally, and in the region, in appropriate publications.”

Also would like you to consider having an SPD as neighbouring Rushmoor has, which protects public houses. This could include criteria for the assessment of applications for development proposals affecting the loss of current or former public houses.

CAMRA has produced a “Public House Viability Test” that can be used to assess the viability of pubs and help to demonstrate whether or not a particular public house is economically viable.

We fully accept that in some instances a public house may well not be sustainable, but such a decision should be made following a sound assessment of need and viability.

- At paragraph 9.23, Carter Jonas state that 'in general terms, national retailers... have requirements for units of 500sqm gross and above.' and that 'stores with floorspace over 500sqm gross are unlikely to be a purely local facility and will tend to draw from outside of their immediate local catchment'. We consider that these statements are too general and, indeed, not correct. Sainsbury's, for example, operates over 700 "Sainsbury's Local" stores the majority of which have a floor area of under 500sqm – and this remains a key element of their ongoing requirements across the Country. Some Sainsbury's Local stores have floorspace over 500sqm – but still cater to a local market.

A threshold as low as 500sqm would unduly stifle the convenience retail market and would deprive locations of valuable local facilities that are just as likely (if not more likely) to compete with out of town supermarkets as they are with town and district centres.

Carter Jonas later go on to suggest that a floorspace threshold below 500sqm would be too inflexible, but we would suggest that even 500sqm is too inflexible – particularly without any caveat on the locations where such an assessment would be required.

The Retail and Leisure Study Update 2014 indicates that most local convenience retail outlets are likely to be below the proposed 500 sq m threshold, as the respondent points out by quoting part of the study. The respondent has also acknowledged that most of Sainsbury's Local stores also fall below this size. Therefore, it appears a suitable figure to adopt for our local impact threshold.

It is acknowledged that there may be some stores that are above the threshold. However if we were to increase it above 500 sq m then it would enable other stores that draw their trade from beyond the immediate local area.

<ul style="list-style-type: none"> Although not objecting in total to these policies concerning District Centres and rural Local Centres, we have specific concerns. We object to the inclusion of the phrases "and other main town centre use" where it appears in both policies. <p>The definition of main town centre uses within these policy sections (paras. 4.4.87b and 4.4.92a) include an extremely wide ranging selection of activities, some of which are totally inappropriate to locations such as Station Parade and Bishopmead Parade, East Horsley. Examples include factory outlet centres, casinos, drive-through restaurants and night clubs. The fact that these uses will be "supported" by Policies E8 and E9 is a concern. The designation "retail and other main town centre uses" replaces the previous wording which simply said "retail development". The term "consistent with the scale and function of that centre" is insufficient protection against inappropriate development and the reference to "other main town centre uses" and the supporting definition of these uses should be removed.</p>	<p>The NPPF defines 'town centre' as including district and local centres, Within these locations, main town centre uses as defined by the NPPF and in paragraph 4.4.87b of the Submission Plan 2017 are therefore considered appropriate. The wording in criterion (5) of Policy E9 to support retail and other main town centre uses that is consistent with the scale, function of the centre is therefore, in our view, sufficient protection against inappropriate development, and there is no objective reason to restrict particular uses that fall within the main town centre definition.</p>
<ul style="list-style-type: none"> The Local Plan and the [Burpham] Neighbourhood Plan conflict with regard to change of use conditions with reference to local centres. Clarification as to the differing requirements needs documenting. <p>The terms of the Burpham Neighbourhood Plan need to be carried forward in the Local Plan to prevent conflict with town centre policies.</p>	<p>There is no need to document any conflict between the Local Plan and any adopted neighbourhood plans. Neighbourhood plans are required to be in accordance with adopted Local Plans, therefore if a conflict exists, the Local Plan policy will take precedence.</p> <p>Policy B-EMP-2 of the Burpham Neighbourhood Plan sets marketing criteria for loss of D1 and D2 uses – this is not part of proposed policy E9 but is not necessarily in conflict.</p> <p>For class A1 uses, the Local Plan sets a longer marketing period of 12 months compared to 6 months in the Burpham Neighbourhood Plan, if the A1 unit provides for everyday needs. Therefore, if the Local Plan is adopted with policy E9, then the marketing period for changes of use from class A1 uses that provide for everyday needs to non-A uses in Kingpost Parade would become 12 months.</p>

D1: Making better places

Main Issue	Guildford Borough Council Response
<p><i>Representations from Prescribed Bodies and Selected Stakeholders</i></p>	
<p>The National Trust</p> <ul style="list-style-type: none"> Fully support this Policy. However since this is the key policy dealing with design in the plan we suggest that the wording of the first and fifth bullet points in the last section is amended to: <p><i>All developments will respond meaningfully and sensitively to the site, its characteristics and constraints, and the layout, grain, massing and height of surrounding buildings taking into account the context in which they are sited. Be expected to use art, materials and landscaping of a nature appropriate to their setting.</i></p>	<p>Reviewed wording – section moved to Policy D4, point (d) and suggestions taken into account</p>
<p><i>Representations on Specific Issues</i></p>	
<ul style="list-style-type: none"> Lack of reference to historic and vernacular matters and conservation areas. 	<p>Addressed in Policy D3.</p>
<ul style="list-style-type: none"> Object to the weakening of the policy by replacing ‘must’ with ‘should’ at the beginning of paragraph (2). 	<p>Not all the criteria listed in the Policy will apply to all developments that meet the criteria of 25 or more dwellings and therefore it would be inappropriate to say these criteria ‘must’ be met. ‘Should’ is considered a strong, positive policy statement.</p>

D2: Sustainable design

Main Issue	Guildford Borough Council Response
<p><i>Representations from Prescribed Bodies and Selected Stakeholders</i></p>	
<p>Homebuilders Federation</p> <ul style="list-style-type: none"> If the Council wishes to adopt the optional standard for water efficiency then it needs to put this in policy. It cannot introduce this via SPD. It will also need to address the tests set out in the NPPG. One of those tests is viability. It is unclear from the Viability Assessment that has been published (December 2014) whether the Council has assessed this cost. 	<p>New paragraph (4.5.20) has been amended to read “The highest level of water efficiency means that developments should achieve the “optional requirement” described by regulation 36 paragraph 2(b) of the Building Regulations 2010 as a minimum. This “optional requirement” sets a water efficiency standard for new buildings of 110 litres per occupant per day. If the “optional requirement” building regulation is made stronger, or a new national planning standard is introduced, the highest level of water efficiency will refer to the standard that has the lowest water consumption. Compliance with the “optional requirement” is assessed through the building regulation process.”</p> <p>It is considered that this approach is reasonable, given the high level of water stress in the borough.</p> <p>The cost of implementing the 110 litres per day water standard over the national standard in building regulations was found to be between £6 and £9 in the Cost Impact Report for the Housing Standards Review produced by EC Harris. This cost is considered negligible.</p>

<ul style="list-style-type: none"> (Paragraph 4.5.21) The Council indicates that it may impose other requirements on developers, and lists what these might be. It proposes to decide these on a case-by-case basis. This is contrary to the NPPF in paragraphs 15, 17 and 154 and the underlying principle of the plan-led system. The Local Plan ought to provide clarity for applicants so that decisions can be made without delay. The local plan should not to be starting point for negotiation. 	<p>The Policy has been amended as follows “measures that enable sustainable lifestyles for the occupants of the buildings” to reduce the uncertainty surrounding this requirement.</p> <p>The Council agrees that the principle of a plan-led system should be applied. However, the appropriate measures will be different in different cases and it would not be correct to proscribe measures to be applied in all situations.</p>
<ul style="list-style-type: none"> There are potentially viability implications associated with the policy requirement for CCHP. The DCLG document <i>Housing Standards Review: Cost Impacts</i> (for the DCLG by EC Harris, September 2014) provides the latest costs associated with building to the new Part L 2013. We note that the Council’s Viability Assessment has modelled the cost of building to current Part L 2013 (see paragraph 5.3.20). However, it is hard to know whether this would cover the costs associated with building CHP systems, or connecting to these. The EC Harris report referred to above does conclude that there are costs associated with renewable technologies. Since this is a local plan policy requirement the Council should calculate what it might cost for all schemes to provide CHP systems or to connect up to these. 	<p>Following the 2016 consultation, the Council produced the “Assessment of the Viability of Carbon Emission Targets for New Builds” study (the Study). The study examined the impact of the carbon reduction requirement on build costs.</p> <p>It concludes that; i) the requirement <i>is viable</i>, and ii) that developments <i>can viably meet a 20 percent reduction in carbon emission</i>. In light of this evidence, the Policy has been amended to increase the carbon reduction requirement to 20 percent, except for retail developments in the town centre.</p> <p>Regarding the Housing Standards Review, please see the Environmental Sustainability and Climate Change topic paper. This topic paper established that policy D2 is consistent with national policy and legislation.</p> <p>The initial viability testing work for the Local Plan in 2016 assumed a 2.5 percent uplift on build costs as a result of the 2016 policy and found that the plan as a whole was viable. The study finds that the carbon reduction requirement will result in an uplift on build costs of only around one percent for new dwellings and under two percent typically for offices. These values fall under the 2.5 percent figure used in the initial viability testing so the policy is still considered viable despite the increased carbon reduction requirement.</p> <p>The study found that the cost of meeting the carbon reduction</p>

requirement is likely to be around four percent for retail and around five percent for care homes.

The Council has identified that retail developments in the town centre have specific viability issues. As a result, a caveat has been added to the policy that the carbon reduction requirement will not apply to these developments, but will apply to retail developments in other locations. The reasoning behind this decision is set out in the Environmental Sustainability and Climate Change Topic Paper.

For retail outside the town centre, the impact in build costs is considered acceptable given that these developments would be sited in less sustainable locations, and therefore compensatory improvements in sustainable design, construction and energy are needed in order to deliver more sustainable development.

For care homes, the uplift on build costs is considered to be acceptable due to the nature of these developments; care homes are very likely to be built as long term investments and this means that the increase in build costs can therefore be factored in to the overall costs covering a long period. This effect is likely to be offset over time by virtue of the efficiency measures that policy D2 seeks to drive as running costs are reduced.

A significant reason for the disparity in increased build costs between the different types of building is the disparity in the base build cost: the higher the base build cost, the smaller the percentage increase against that base cost provided by meeting the carbon reduction standard. The Study established that the base build cost (adjusted for location) is higher for developments of offices and dwellings than for care homes or retail units. As a result, the uplift in build costs appear higher for care homes and retail units, but instead reflect the lower base build costs.”

Table 3 of the study sets out that CHP technologies were typically

	<p>found to be viable when properly applied. Supporting text in policy D2 sets out requirements that: i) ensure technologies are implemented properly, and ii) that good practice guidance is available from industry bodies, which in turn means CHP technologies should be viable.</p> <p>Consideration of viability is built into the planning process. The other elements of the policy (outside the 20 per cent reduction in carbon emissions) will be considered at the development management stage. However, it is anticipated that meeting the 20 percent reduction in carbon emissions, <i>which is found to be viable</i>, will also mean that other elements of the policy will be met.</p>
<ul style="list-style-type: none"> The policy is inconsistent with the housing standards review. The purpose of the Housing Standards Review was to impose consistency across the country, to assist with the delivery of development and thus matters such as water and energy efficiency are addressed by the Building Regulations. <p>Government policy is to leave sustainable design to building regulations:</p> <ul style="list-style-type: none"> The code for sustainable homes has been withdrawn Policy and guidance prohibits the use of technical standard at a local level, except the “optional” building regulations and the new planning standard for internal space It will create unnecessary red tape, which is at odd with government policy <p>The Council is unable to set any other standards relating to the performance of new dwellings other than the three optional technical standards (WMS, 25 March 2015)</p> <p>The policy also requires that all new developments must connect to (C)CHP distribution networks where they exist, or incorporate the necessary infrastructure for connection to future networks. The Government’s Productivity Plan</p>	<p>The Planning and Energy Act 2008 (paragraph 1) grants powers to Local Planning Authorities to:</p> <ul style="list-style-type: none"> i) Require a proportion of energy used in development to be from renewable and low carbon sources in the locality of the development. ii) Require development to comply with energy efficiency standards that exceed the energy requirements of building regulations. <p>During the passage of the Deregulation Bill, parliament debated revoking the first of these powers, concluding that it should be retained. It is clear therefore that parliament wishes Local Planning Authorities to be able to set standards for renewable and low carbon energy. The Council’s view is that this is synonymous with carbon reduction. Under UK law, parliament is sovereign and legislation takes primacy over government policy. The Council’s barristers have confirmed this view.</p> <p>Whilst the Deregulation Act 2015 includes an amendment that revokes the second of these powers, this amendment;</p> <ul style="list-style-type: none"> i) has not yet commenced, ii) does not have a commencement date and, iii) may never commence as it was intended to commence

announced the government's decision not to proceed with its zero carbon Allowable Solutions carbon offsetting scheme, or with its proposed 2016 increase in on-site energy efficiency standards (page 46). The purpose of this announcement was to reduce the burden of regulation on housebuilders which was *'hindering competition by raising barriers to entry, adaptation and expansion'* (page 43). It is the HBF's view that having suspended the Allowable Solutions scheme and the 2016 increase in energy efficiency standards, developers are only required to meet Part L 2013 of the Building Regulations.

This policy will not require provision of or connection to CHP systems. Generally, meeting Part L 2013 does not require providing or connecting to CHP systems or contributing to other offsite energy efficiency measures. The announcement in the Government's productivity plan post-dates the NPPF. We are aware that paragraph 96 of the NPPF allows local authorities adopt local policies for the support of decentralised energy schemes but we consider that the direction of Government policy has been set by the Productivity Plan.

The policy cannot require provision of an energy statement. Applicants only need to meet part L of the building regulations. Applicants are not required to demonstrate how they have achieved Part L 2013 through energy statements. As the Written Ministerial Statement states: "local planning authorities (will) also need to review their local information requirements to ensure that technical detail that is no longer necessary is not requested to support planning applications."

alongside the introduction of the national zero carbon standard, which is not currently scheduled to go ahead. Even if the amendment were to commence, it would not revoke the power to require a proportion of energy to be from renewable and low and zero carbon energy sources, as the amendment does not address this provision.

The written ministerial statement of March 2015 addressed the power to require energy efficiency standards exceeding building regulations. The statement stated that the Government "would expect local planning authorities to take this statement of the Government's intention [to introduce a national zero carbon standard and setting energy performance requirements in Building Regulations at a level equivalent to the (outgoing) Code for Sustainable Homes Level 4] into account when applying existing policies, and not set conditions with requirements above a Code level 4 equivalent." As the government changed its intention in June 2015, when it announced it would not be proceeding with the zero carbon standard and the tightening of building regulations relating to energy efficiency, this statement is given very little weight. Additionally, legal advice confirms that written ministerial statements cannot overrule legislation.

The issue of conflict between government policy and national legislation is further examined in the Environmental Sustainability and Climate Change topic paper and the advice received from the Council's barristers.

It is not agreed that proposals for development need only meet the Building Regulations as many types of development also need planning permission from a Local Planning Authority. Applicants for planning permission must meet the requirements set out in policies in the development plan. The submission of an energy statement is a simple way for developers to show that they have met the policy requirement for a reduction in carbon emissions.

<ul style="list-style-type: none"> • Criterion 1b requires the sustainability statement to set out how the development will deliver “the lowest level of carbon emissions (direct and embodied).” Similarly, criterion 1c requires “the highest levels of energy and water efficiency.” As currently it is considered that the proposed policy wording is ineffective. No clarity is provided as to what constitutes the lowest or highest levels. For instance, should a new form of emerging technology be able to deliver a lower level of carbon emissions but this is not currently widely available this would seemingly fail the currently proposed policy test. Similarly if there is a form of technology available but this would be prohibitively expensive and would render the development unviable, this would again fail the proposed policy test. Further clarity and flexibility must therefore be introduced to the proposed policy wording. 	<p>Consideration of the achievability of the measures required to deliver the “highest levels of energy efficiency” and “lowest levels of carbon emissions” is implicit within planning policy. It is not therefore considered necessary to add the word ‘achievable’ to the text. Where low-carbon technologies are not available, not feasible, or not viable, they would not be considered achievable.”</p> <p>The Policy includes a minimum standard for carbon reduction at paragraph 4.5.30: “The reduction in emissions is judged against a baseline of the relevant Target Emission Rate (TER) set out in the Building Regulations”.</p> <p>The ‘highest level of water efficiency’ is defined in the supporting text (at paragraph 4.5.20) as the ‘highest national standard’, which is currently described by regulation 36(2)(b) of the Building Regulations.</p>
<p><i>Representations on Specific Issues</i></p>	
<ul style="list-style-type: none"> • The policy should also be about preserving the borough’s natural capital/the natural environment/ protecting the countryside from development. <p>Sustainability should be an overarching ambition running through the whole local plan. It should be set out clearly in Policy S1. This policy amounts to “greenwashing”, is contradictory and hypocritical. It ignores the rest of the plan which will build dormitory towns across the Green Belt that are environmentally and socially unsustainable, will require increased car use, will lead to increased congestion/ air pollution/carbon dioxide emissions, will stretch infrastructure, stretch the water supply and impact on the character of the area. The provisions of the policy will not compensate for that and the targets of the policy will be unachievable if the other policies are implemented.</p>	<p>Policy D2 deals with sustainable design, construction and energy only. The protection and enhancement of the natural environment is addressed in Policy ID4.</p> <p>The Plan should be read as a whole and all the policies should be considered together when the sustainability of the Plan is considered. The role of the Local Plan, set by the NPPF, is to balance environmental, social and economic sustainability and the Plan balances these three sometimes competing requirements.</p> <p>Comments about whether the plan as a whole is sustainable are addressed against Policy S2, which deals with the borough wide strategy.</p>

<ul style="list-style-type: none"> Support for water conservation and the efficient use of water, the target of 110 litres per person per day and the references to this in paragraphs 4.5.10 and 4.5.19, but there should be a clearer reference in Policy D2 itself. <p>The policy should include grey water usage (via attenuation tanks) and grey water recovery.</p>	<p>The optional building regulation for water efficiency is not referred to in the policy itself as this technical standard may be reviewed by central government in the future, and the low level of water availability in the borough warrants the highest standard of water efficiency available. Additional text has been added at paragraph 4.5.20 that states that the “highest level of water efficiency” (the term used in the policy) means the highest standard available at the time, and that this currently means the optional building regulation of 110 litres per day. It is considered that this provides more clarity than previously, but does not rule out the adoption of future, stronger water efficiency standards.</p> <p>The requirement for the implementation of specific measures, such as grey water recovery systems, is considered overly prescriptive.</p>
<ul style="list-style-type: none"> The policy confirms that use class A1, A2, A3 and A4 development in Guildford town centre will not be subject to a carbon reduction requirement, however the requirement applies to new town centre apartments. Paragraph 4.5.30 states that new buildings “except retail developments in Guildford Town Centre” must achieve a reasonable reduction in carbon emissions. Clarification is required on whether the new homes element of retail-led mixed-use development on North Street will be subject to the policy. 	<p>Clarifying text has been added to minor modifications sheet to confirm that new homes in mixed use developments in the town centre must meet the carbon reduction requirement.</p> <p>It is feasible for residential and other uses within mixed use developments in the town centre to meet the requirement while retail units do not as technologies are available that would enable this. For example, this could be achieved through PV on the roof which feeds energy to dwellings above retail units, or if insufficient roof space exists and the developments are genuinely mixed use (providing diversity of occupational demand for heating and/or cooling) – through block or district heating which could include heat pumps or micro (or larger) CHP with NOx inhibitors.</p>

<ul style="list-style-type: none"> • Objection to retail developments in town centre being exempted from climate change measures. Climate change is a serious issue and the planning system is required to address it. Carbon targets cannot be met if exemptions are made. It is not understood why there is a blanket exemption in Policy D2(10) for retail developments in the Town Centre, and although this is partly explained in paragraph 4.5.37a, there should be a recognition in these paragraphs rather than a specific policy exemption (after all, exactly the same argument could have been applied to Affordable Housing). Recommend the removal of Policy D2(10). 	<p>The rationale for exempting retail units in the town centre is set out at 4.5.37a and discussed in the Environmental Sustainability and Climate Change Topic Paper (paragraphs TBC).</p>
<ul style="list-style-type: none"> • The Updated Sustainability Topic Paper refers to national objectives and targets but there is limited, if any, local justification provided and with the exception of brief references to the 2013 Guildford Borough Environmental Sustainability and Climate Change Study (ESCC), it is not clear where the evidence to support the Council's approach is located. 	<p>The Environmental Sustainability and Climate Change Study aggregates local evidence from a wide variety of sources that identifies both a need and an opportunity to deliver low and zero carbon energy, improved water efficiency and improve the standard of the building stock.</p> <p>The Council has also produced the Renewable Energy Mapping Study, local evidence which identifies opportunities to deliver (C)CHP networks, which enable the plan to meet national policy and the Assessment of the Viability of Carbon Emission Targets for New Builds study, which examines the costs of the carbon reduction target.</p> <p>This evidence is adequate, up-to-date and relevant, as required by the NPPF. The Environmental Sustainability and Climate Change Topic Paper will be updated to make this more clear. The Topic Paper combines this evidence with national legislation and policy drivers to set out support for the approach.</p>

<ul style="list-style-type: none"> The building regulations require high standards of energy and water; additional standards are not needed and it is unreasonable to require developers to provide evidence of viability and feasibility in support of planning applications for development. <p>Objection to the requirement under ‘Sustainable development’ for development to be supported by the submission of a sustainability statement. In particular, the requirement to set out how they will deliver “the lowest level of carbon emissions (direct and embodied) that is achievable” is in conflict with the NPPF and is unsound.</p>	<p>The NPPF requires that the planning system, rather than building regulations, delivers sustainable development generally and “secure radical reductions in greenhouse gas emissions” in particular (paragraph 93). Policy D2 delivers this NPPF requirement with regards to design, construction and energy.</p> <p>See the Environmental Sustainability and Climate Change Topic Paper (paragraphs TBC) which sets out the policy and legislative support for including such measures in local plans.</p> <p>The requirement for the submission of a sustainability statement is a simple way for applicants for planning permission to demonstrate that they have complied with the requirements of Policy D2.</p>
<ul style="list-style-type: none"> Paragraph 95 of the NPPF states that when setting local requirements for a building's sustainability, local planning authorities must do so in a way consistent with the Government's zero carbon buildings policy and adopt nationally described standards. Following the royal assent of the Housing and Planning Bill the Government's proposed Zero Carbon Standard has been deleted and in its stead, the Government has introduced a clause to the Bill which commits to a review of the energy efficiency standard for new homes in building regulations. <p>There are no references to any ‘allowable solutions’; off-site sources of energy generation, which may count towards carbon offset.</p>	<p>It is not considered that the policy conflicts with the zero carbon standard. This is discussed in the Environmental Sustainability and Climate Change Topic Paper (paragraphs TBC).</p> <p>The Policy requires development to be sustainable and to follow the ‘Energy Hierarchy’. The final step of the hierarchy is offsetting carbon emissions, which would include the “allowable solutions” referred to in the zero carbon standard.</p>
<ul style="list-style-type: none"> The Planning Practice Guidance states that local planning authorities have the option to set additional technical requirements exceeding the minimum standards required by Building Regulations in respect of access and water. However, in doing so the local planning authority will need to gather evidence to determine whether there is a need 	<p>The reasoning supporting Policy D2 is established in the ‘reasoned justification’ section within the Policy’s supporting text. This reasoned justification is reinforced with evidence provided in the Guildford Environmental Sustainability and Climate Change Study (2013) referred to in the ‘Key Evidence’ section. The Environmental Sustainability and Climate Change topic paper summarises this</p>

<p>for additional standards in their area, and justify setting appropriate policies in their Local Plans (Reference ID: 56-002-20160519). It is not clear where the evidence behind the requirements of Policy D2 is located within the Local Plan evidence base.</p>	<p>evidence and provides explanation as to how this evidence has led to Policy D2</p>
<ul style="list-style-type: none"> Policy D2 is intended to align with national legislation, policy and guidance by offering strong support for low and zero carbon and decentralised energy with a particular focus on Combined Heat and Power (CHP). However, it is suggested that the wording of Policy D2 is amended to make clear the policy is 'encouraging' rather than requiring measures to be met. The requirement for CHP connection for any development should be amended, to make clear that the policy is 'encouraging' rather than requiring so that it states that "...all new developments are encouraged to connect to CHP...." 	<p>The Council does not agree with this suggestion. The (C)CHP requirements of the Policy D2 are aligned with national policy. Additionally, the Planning and Energy Act 2008 allows local authorities to impose reasonable "requirements" relating to energy. It does not limit this power to "encouraging" such measures.</p>
<ul style="list-style-type: none"> The Policy should include a requirement that the higher initial construction cost of energy efficient homes will not be allowable as a grounds for viability waivers. 	<p>The NPPF (paragraph 173) requires local plans to be deliverable and stipulates that development should not be subject to such a scale of policy burdens that their ability to be developed viably is threatened. This proposed change would not be consistent with the NPPF.</p>
<ul style="list-style-type: none"> At 4.5.30a there is reference to a financial viability test. There must be some form of hierarchy of viability tests to establish the sequence in which policy requirements (subject to viability) are withdrawn. For example, does the energy requirement come before or after Affordable Housing? It would be helpful to have a specific, clear policy on Viability as part of the Local Plan. 	<p>Viability testing for the Plan indicates that the policies are viable when applied as a whole. However, should viability issues arise, essential obligations would be sought first as these would likely mean that development is refused permission if they cannot be delivered. This would include SPA contributions and essential infrastructure. After these essential obligations are taken in to consideration, non-essential obligations should be considered.</p>

- The Council's October 2016 Local Plan and Viability Study (LPVS) recognises that this policy has cost implications (Table 3.1 refers), however it has failed to capture the extent of the costs associated with development. The LPVS indicates at Paragraph 5.3.32 that the Council was considering a 15% reduction in carbon reduction, is similar to the 'Merton Rule', adopted by Merton Council in 2003, which seeks 10% on-site renewable provision. As a result of this, a build cost of 2.5% has been factored into the viability assumptions.
The actual position is somewhat different, as the Council is not seeking a carbon reduction, but expresses a preference for low carbon technologies. The LPVS is therefore incorrect in assuming that the Council's previous 15% figure was akin to the Merton Rule, indeed it was 5% higher, meaning that the Council's modelling of this in the LPVS was incorrect. The new consultation document takes this further still, requiring 20% low carbon/renewable sources should be provided with new development. There is no policy basis for this figure and the financial implications of this have not been tested by the Council to even see whether this is a viable proposition.

Whilst the implications of the proposed increase to 20% have been assessed in the Assessment of the Viability of Carbon Emission Targets for New Builds (April 2017) prepared by Evora Edge, this has not been considered in combination with the other proposed revised policy requirements through an updated viability assessment. The current requirement is therefore considered to be unsound in that it is neither justified nor effective.

The assumption in the 2016 viability assessment that the carbon reduction requirement would increase build costs by 2.5% was based on the costs of meeting the Code for Sustainable Homes level 4, not the costs of meeting the Merton Rule.

The requirement in the policy is for a reduction of carbon emissions, not for a proportion of energy to be met from low and zero carbon sources, and is therefore not a 'Merton Rule'. Additionally, the energy hierarchy must be considered by qualifying developments. The energy hierarchy makes it clear that energy reduction should be a first step, before energy sources are considered.

The Council has produced the Assessment of the Viability of Carbon Emissions Targets for New Builds, which demonstrates that the 15 and 20 per cent carbon reductions targets are both viable.

The 2016 viability study assumed that the cost of meeting the policy was an uplift of 2.5 per cent on build costs. The assessment of April 2017 found that the cost is actually lower for dwellings and offices, which means that the requirement is viable for these development types.

The assessment found that the cost of meeting the carbon reduction requirement is likely to be around four per cent for retail and around five per cent for care homes. The Council does not think this presents a viability issue for the reasons set out in the Environmental Sustainability and Climate Change Topic Paper (paragraphs TBC) and elsewhere in this document.

<ul style="list-style-type: none"> Having all developments connect to (C)CHP distribution networks is not practical as there are a number of areas within Guildford where such a connection will not be possible. This will therefore have a further impact on the viability of schemes and will restrict developments to particular areas, in a borough which is already heavily restricted by Green Belt. <p>This policy's emphasis on Combined Cooling Heating and Power and communal heating networks is difficult to understand, since no such networks are available locally.</p>	<p>The Policy only requires connection to existing (C)CHP networks where they exist. Where networks do not exist, it encourages the provision of them as a first step in the heating and cooling hierarchy, but does not require it where it is not the most sustainable option. Feasibility and viability are considered as part of the development management process and where (C)CHP is not feasible or viable, developments will provide energy based on the next step in the hierarchy.</p> <p>The policy focus on (C)CHP is a result of national policy, work undertaken with the Carbon Trust and other Local Plan policies that have successfully passed examination. The Sustainable Design, Construction and Energy topic paper sets this out in more detail.</p>
<ul style="list-style-type: none"> Para (7) would, as written, require new dwellings everywhere [e.g. the country ends of East Horsley] to be 'connection-ready'. It has to be understood that 'connection-ready' means a sizing of heating systems appropriate for (C)CHP, and so probably unsuitable for whatever is a more suitable method for the location e.g. heat pumps. Clearly (C)CHP is unlikely to be delivered in all locations. The proposed policy wording does provide some flexibility in respect of demonstrating if it is feasible, however this test needs to be applied to the site itself and the wider context. Whilst it may be feasible for the development to provide the necessary infrastructure for connection to future networks, if it can be robustly demonstrated that the location in general is not feasible for a future network to be delivered then this should equally apply. The proposed policy text should be updated to clarify this approach. 	<p>'Connection ready' is defined at 4.5.29 as the use of a centralised, wet heating system and compliance with the minimum standards in the Chartered Institute of Building Services Engineers (CIBSE) Heat Networks Code of Practice.</p> <p>A wet heating system could be fed by a number of different technologies, including heat pumps. As renewable energy sources such as heat pumps, which operate at lower temperatures, are integrated into heat networks they will become more viable in lower density, rural settings. Even in the absence of a heat network, or a likely future heat network, the use of a centralised, wet heating system provides an efficient solution for heating a building when compared with conventional electric heating systems.</p> <p>Renewable heat pumps should be considered an appropriate solution, particularly in more rural areas where heat networks are less likely to be viable. These can be deployed on a communal or individual dwelling level, depending on what is most appropriate and with regard to the heating and cooling hierarchy in policy D2 where relevant.</p>

	<p>It should be incumbent on all sites to consider the full range of options available to them and to future proof their site for connection where feasible. This should not prevent the potential to deploy individual renewable heating solutions, such as heat pumps, where appropriate. This is a long term policy, and whilst heat networks or communal heating may not be viable in rural settings today, this is not necessarily the case in future, particularly as 4th generation district heating concepts are implemented and operating temperatures are reduced.</p>
<ul style="list-style-type: none"> • Experience shows that premature or ill advised 'sustainable' works do not save the energy suggested in the original calculations and create expensive problems for the future . For example, inverters for solar electricity tend to fail after about ten years, 'spares' for that model of installation are then no longer available, and Fire Brigades are reportedly very cautious about entering to extinguish if such house do catch fire, due to the risk of roof collapse. GBC has insufficient expert scientific industry knowledge to evaluate highly technical schemes of this kind. There is the side risk of GBC being sued over future failure if the works were installed as a result of formal requirement. This should be left to building regulations/government. 	<p>The Policy has been produced with assistance from the Carbon Trust, an organisation with technical knowledge in the field. The policy requires the provision of low carbon technologies in certain situations but does not introduce technical requirements that set out how the technologies should be implemented. Where it is demonstrated that technologies are inappropriate for a particular development, they would not be required.</p> <p>The safe implementation of renewable and low carbon technologies is assessed through the building control process and is not a matter for planning policy.</p>

D3: Historic environment

Main Issue	Guildford Borough Council response
<p><i>Representations from Prescribed Bodies and Selected Stakeholders</i></p>	
<p>Surrey County Council</p> <ul style="list-style-type: none"> Suggest that the section on the historic environment would be better placed within the "Protecting" section, rather than within the "Design" section, as heritage management shares many common objectives and practices with other environmental protection policies. <p>Policy D3 mentions support for "development of the highest design quality". SCC considers that this needs to be more clearly defined. Assessment of design quality and aesthetic appeal is of course highly subjective, nevertheless it is recommended that at least some parameters for outlining a definition for "high quality" would be helpful in the implementation of this Policy and suggest that this should be set out either in the supporting text of in an appendix.</p> <p>A possible approach could be for, "highest quality" to be required to satisfy the relevant "architectural interest" requirements that are commonly assessed as part of the Listing process for historic buildings (set out in "<i>Principles of Selection for Listing Buildings</i>", DCMS, 2010).</p>	<p>This Policy is appropriately placed in the 'design' section of the Proposed Submission Local Plan; it is a more proactive policy and goes beyond just protecting heritage assets.</p> <p>Policy D4 on the character and design of new development has been expanded significantly to address 'high quality' design in new developments. The reasoned justification (paragraph 4.5.49a) also expands upon design expectations and clarifies that 'these design considerations will be set out in more detail in Local Plan Development Management Policies Document'.</p>

<p>Historic England</p> <ul style="list-style-type: none">• The Submission Local Plan seeks to achieve an appropriate balance between needs of protecting environmental qualities, including the historic environment, and the necessary growth and development to ensure Guildford’s continued vitality and economic, social and environmental sustainability. In its high incidence of references to heritage and the historic environment, and the role this plays in achieving sustainable development, the plan largely succeeds in this respect. <p>There are a few matters of detail that Historic England would like to see addressed in the final version of the plan, but these are not fundamental impediments to its adoption. Policy D3: Historic environment is weak in its wording though supported by a good introduction and an appropriate reasoned justification. The weakness in the policy arises from its focus being reactive, and we would suggest a more proactive form of wording is sought that reflects some of the intentions set out in paragraph 4.5.45. As with other areas of policy, the NPPF requires the local plan to actively promote and support actions to sustain, enhance and enjoy the historic environment (ref. paras 126 and 157, final bullet) addressing, in particular, heritage at risk.</p>	<p>Policy D3 is a strategic policy that provides an overarching framework. Further work on the strategy toward the conservation of the historic environment will be developed in the Local Plan Development Management Policies document (see paragraph 4.5.45).</p> <p>In light of these comments, the wording of Policy D3 has been amended to be more proactive and supportive.</p>
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Representations on Specific Issues	
<p><i>Scale of development:</i></p> <ul style="list-style-type: none"> • Objection to the damage to the historic environment as a result of the excessive scale of the proposed development. <p>The Policy supports overdevelopment: you can't "enhance" history. Doesn't ban private interests from trying to make aggressive profits from privatising, commercialising and Disneyfying public historic assets.</p> <p>Policy does not respect the historic environment of the rural villages when considering inappropriate large developments. These areas need protecting, not destroying due to the effects of increased traffic, parking problems, etc and wholly inappropriate development.</p>	<p>Alongside the NPPF (see section 12 in particular), Policy D3 will ensure that the historic environment will be conserved and enhanced in a manner appropriate to its significance.</p>
<p><i>Policy Wording:</i></p> <ul style="list-style-type: none"> • The wording is too imprecise and ineffective and will leave Guildford's valuable historic sites at risk of inappropriate development. Delete wording "seek to". <p>The sentence in paragraph 4.5.38: <i>"We will seek to ensure that there is an imaginative approach to ensuring that heritage assets are kept in use and do not fall into disrepair"</i> should be included in Policy D3 policy box.</p> <p>Policy D3 is not consistent with the NPPF (paragraphs 126 - 134) as the distinction between development that leads to "substantial" harm of a heritage asset as opposed to "less than substantial harm" is not made clear. Paragraph 2 of draft Policy D3 states that works which would cause harm to the significance of a heritage asset, whether designated or non-designated, or its setting, will not be permitted without a clear justification to show that the public benefits of the proposal considerably outweigh any harm to the significance or special</p>	<p>Alongside the NPPF (see section 12 in particular), Policy D3 will ensure that the historic environment will be conserved and enhanced in a manner appropriate to its significance.</p> <p>The wording of Policy D3 has been reviewed and strengthened.</p> <p>Policies have to be consistent with national policy and one of the core planning principles is to <i>conserve</i> heritage assets in a manner appropriate to their significance so they can be enjoyed for their contribution to the quality of life of this and future generations. Policy D3 reflects this approach and the wording used in the NPPF.</p> <p>The NPPF has a presumption in favour of sustainable development with one of the core planning principles being to "conserve heritage assets in a manner appropriate to their significance..." The use of the word conserve in Policy D3 reflects the language in the NPPF.</p> <p>Paragraphs 132 and 133 of the NPPF address the issue of substantial</p>

<p>interest of the heritage asset in question. Where there is "substantial" harm to a heritage asset the NPPF makes clear that the relevant test is whether the substantial harm is necessary to achieve substantial public benefits that outweigh the harm.</p> <p>However, where there is "less than substantial harm" the NPPF advises that the decision-maker should weigh the harm against the public benefits of the proposal. This distinction should be reflected in Policy D3 so that the second paragraph reads: "<i>Heritage assets are an irreplaceable resource and works which would cause substantial harm to the significance of a heritage asset, whether designated or non-designated, or its setting, will not be permitted without a clear justification to demonstrate that substantial harm is necessary to achieve substantial public benefits that outweigh the harm. Where the harm is assessed to be less than substantial this harm will need to be weighed against the public benefits of the proposal.</i>"</p> <p>Whilst it is acknowledged what the NPPF states in paragraphs 132 and 133 about the substantial harm or total loss of a heritage asset policy D3 does not recognise the wording in NPPF paragraph 134. That talks about weighing the harm done to the heritage asset against the public benefits, the wording currently within D3 goes a step beyond this.</p>	<p>and less than substantial harm to heritage assets and the public benefits weighting exercise that needs to be undertaken if any harm is identified, the wording of D3 reflects this.</p>
<ul style="list-style-type: none"> • This policy needs to have an overriding emphasis on protection rather than supporting development. 	<p>The NPPF focuses on <i>conserving</i> heritage assets in a manner appropriate to their significance and Policy D3 reflects this wording.</p>

<p><i>Artifacts and archaeology:</i></p> <ul style="list-style-type: none"> The Plan is lacking inclusion of an Archaeology Policy in respect of these virgin Green Belt development sites. Noting that Gosden Hill, while having been ploughed in recent times is the second hill and adjacent hill to where the Simian Pot was found in 1892 implies potential archaeological remains could exist on this site. This is a shortcoming in the Plan. 	<p>NPPF paragraph 139 addresses this issue. Additional wording added to new paragraph 4.5.42a: The County Archaeologist will be consulted on all planning applications on sites of archaeological importance.</p>
<ul style="list-style-type: none"> Review undesignated assets and such assets should not prejudice the delivery of new development. <p>The character assessments are ten years old and should be reviewed.</p>	<p>The character assessments and undesignated assets will be reviewed in due course.</p>

D4: Character and Design of new development

Main Issue	Guildford Borough Council Response
<i>Representations on Specific Issues</i>	
<ul style="list-style-type: none"> The Policy should apply to all areas not just urban areas and inset villages (e.g. infill). 	<p>Policy now incorporates all development principles from D1 and then adds additional considerations for inset and washed over villages.</p>
<ul style="list-style-type: none"> Policy should not cover urban areas and villages, as they are very different. The policy should only apply to urban areas/villages that should remain Green Belt. 	<p>The principles of good design apply to all kinds of area. However, the policy does provide additional criteria specifically related to villages.</p>
<ul style="list-style-type: none"> The level of development proposed will not protect the important character of villages, preserve views, ensure that the layout, scale, form, massing, height of buildings and structures, and materials relate to the site context and its surroundings, lead to no unacceptable effect on amenities. 	<p>The application of this policy will ensure those issues raised will be considered as part of any planning application and if the impacts are unacceptable permission will be refused.</p>
<ul style="list-style-type: none"> Policy should only apply to non-allocated sites. As drafted it could undermine delivery of allocated sites as expansion and development of edge of settlement sites will necessitate some changes in scale, massing and height. It will also be necessary to build at increased densities in order to ensure the most effective use of land. It may allow the principle of development to be revisited <p>The criteria set out for new development within inset village areas should also not serve as a brake on the delivery of Site Allocations.</p>	<p>The principle of development is inherently accepted within the allocation. Developing these allocated sites is not incompatible with Policy D4. The Reasoned Justification that supports the policy text explains why good design is required on all new development.</p>

<ul style="list-style-type: none"> It is considered that the tone of the policy could serve to curtail rather than encourage the development of the specific site allocations identified in the Plan. Paragraph 4.5.46 suggests that the policy is targeted to windfall opportunities. However, the wording could still be applied to 'all new development' including site allocations. This would undermine the delivery of Site Allocations and impact on the delivery of the Council's housing target. 	<p>Paragraph 4.5.46 has been amended to clarify that high quality design is indeed a requirement on all new development. Ensuring that good design principles are adhered to within new developments will not undermine the delivery of sites that are allocated within the Plan.</p>
<ul style="list-style-type: none"> The policy requires applicants to demonstrate how they have had regard to Building for Life 12 (BfL12) and that they must show that they have performed positively against this. This is a condition of planning permission. This is unsound because it is unjustified. BfL12 was devised as a tool to assist developers in helping to create better designed schemes. It was never intended to operate as a mandatory development management tool. BfL12 does not work as a scoring system since it is a collection of guiding principles. The Council can refer to BfL12 in the supporting text but it cannot make this a requirement of local policy. 	<p>The current wording used in Policy D4, that new development '<i>be expected to have regard to and perform positively against the Building for Life guidance</i>' is not seeking to apply this as a mandatory assessment, but that regard is had to it.</p>
<ul style="list-style-type: none"> Buildings For Life should be made a mandatory requirement 	<p>The Building for Life criteria are intended to help guide good design, the Policy wording recognises this by requiring that regard be had to those principles.</p>
<ul style="list-style-type: none"> Objection to the requirement that development 'conforms to the nationally described space standards'. This should be amended to 'be expected to have regard to ...' 	<p>The space standards prescribe a minimum standard below which development is not considered to be acceptable. Therefore, it is appropriate that proposals are required to conform to these standards. Minimum standards on space are appropriate given the increasing concern highlighted nationally that developers are beginning to compromise on the size of units in order to increase the 'viability' of sites that provide an appropriate housing mix. This is particularly pertinent in town centre locations.</p>

- The only response to density in the Plan concerns an open-ended requirement at criterion (E) of Policy D4 that seeks to ensure appropriate density to make the most efficient use of the land whilst responding to local character and context. Whilst as a concept this is sensible, this gives little guidance on local circumstances or the general starting point for density, particularly in the residential sector. This is inconsistent with the requirements of local authorities in paragraph 47 of the NPPF to 'set out their own approach to housing density to reflect local circumstances'.

The guidance referred to in the NPPF, in addition to the reference in the strategic Plan are considered to be a sufficient hook to provide either more detail in the Direct Management Development Plan Documents, or to provide a Supplementary Planning Document outlining the Council's approach to density within the borough.

Draft

ID1: Infrastructure and delivery

Main Issue	Guildford Borough Council Response
<p>Responses from Prescribed Bodies and Selected Stakeholders</p>	
<p>Surrey County Council (SCC) - Transport</p> <ul style="list-style-type: none"> The Guildford Borough Proposed Submission Local Plan “June 2016”: Strategic Highway Assessment Report (Surrey CC, June 2016) (hereafter the SHAR 2016) indicates that the schemes included in the Department for Transport’s Road Investment Strategy March 2015 and identified in the Infrastructure Schedule (Appendix C) are essential to mitigate the impact of the development proposals of the Submission Local Plan. Without such investment, the cumulative impacts of the new development proposed on the Strategic Route Network (SRN) could be considered “severe” due to safety issues. <p>The Infrastructure Schedule identifies a number of new transport infrastructure projects. As these projects are developed and further details regarding their land requirements are known, appropriate action will need to be taken to safeguard the land to allow these projects to be implemented.</p>	<p>Surrey County Council was commissioned to undertake the SHAR and the conclusions are considered to be robust.</p> <p>In the early years of the new Local Plan, the delivery of planned development and the impact of new development traffic on the Strategic Road Network (SRN) is likely to be an important ongoing consideration as the existing SRN suffers from significant congestion during peak periods. Highways England’s main concern is road safety and any proposal that adds significant levels of traffic to existing congested areas will need to be carefully assessed through the development management process for planning applications to ensure that it does not have a severe impact on road safety.</p> <p>With this in mind, the delivery of planned development has been proposed to ensure that the sites, and phasing of sites, that will be delivered in the first years of the new Local Plan, and therefore in the absence of the Department for Transport’s RIS Road Period 1 and/or Road Period 2 schemes are located where traffic associated with them will have the least impact on the SRN’s links and junctions where current congestion issues are the most acute.</p> <p>Policy ID1 requires, at point (3), that ‘If the timely provision of infrastructure necessary to support new development cannot be secured, planning permission will be refused’. When determining planning applications, and attaching appropriate planning conditions and/or planning obligations, regard will be had to the delivery and timing of delivery of the key infrastructure, or otherwise alternative</p>

	<p>interventions which provide comparable mitigation’.</p> <p>Various site policies include requirements to provide land for schemes listed in the Infrastructure Schedule.</p> <p>In terms of the land required for other transport schemes listed in the Infrastructure Schedule, it has been assumed that the land required will be within the highway boundary of adopted roads, on land controlled by the relevant site promoter, on land controlled by the Council, or that it can be secured by the exercise of powers available to the highway authorities.</p>
<p>SCC - Education</p> <ul style="list-style-type: none"> • Comments made on designation of school playing fields as open space. 	<p>See ID4 for response on Open Spaces / Playing fields designations.</p>
<p>SCC - Minerals and Waste</p> <ul style="list-style-type: none"> • Proposed new settlement at the former Wisley Airfield (A35) is located within a minerals safeguarding area, but unlikely that the underlying sharp sand and gravel resource will be worked in future. Nevertheless, the applicant should be required to investigate the potential for prior working before any planning application being submitted. <p>Important that GBC acknowledges in the Plan that waste management facilities are essential infrastructure to support new housing and industry.</p> <p>The Local Plan should acknowledge that many waste management activities fall within the general industrial class in the Use Classes Order, and can be considered a B1c, B2 or B8 use and may be located within modern, purpose-designed buildings on industrial estates - this would accord with SWP Policy WD2. We would additionally like to see Policy E2 of the Proposed Submission Local Plan under the heading of, “Industrial, warehousing and storage,” make reference to the inclusion of suitable waste management</p>	<p>A35: Land at former Wisley Airfield was changed to add “<i>Located within a minerals safeguarding area</i>” as a key consideration.</p> <p>A35 “Description: Key considerations” includes recognition of 16.98 Ha allocation for waste use in Surrey Waste Plan 2008.</p> <p>The Infrastructure Schedule identifies necessary infrastructure to support development and includes at section 8, waste infrastructure.</p> <p>Changes made to Policy E2, 4.4.23a under “reasoned justification.”</p> <p>See responses under site allocations – former Wisley Airfield (A35). The site is no longer available for a waste use. This will be reflected as part of the new waste plan.</p>

facilities to reinforce the principle of directing waste facilities first to industrial/employment sites in urban areas in accordance with SWP Policy CW5.

Concern as to the potential loss of the allocated waste management site at the former airfield at Wisley. Previous response, dated 18 September 2014, to the consultation on the Draft Local Plan, pointed to the SWP allocation of the site for waste management use and an existing planning permission for a waste management facility. The proposals for Wisley effectively prejudice the implementation of Surrey's waste strategy as set out in the SWP and therefore object to this proposed policy. Consider the Plan unsound in that it does not take account of the acknowledged requirement for waste management facilities and the SWP allocation.

Elmbridge BC

- ID1(3) appears to be contradicted in ID1(5) where it is suggested that regard will be had to the delivery and timing of key infrastructure but does not necessarily constitute a refusal.

The Policy would read better if the planning application and Local Plan elements were more clearly distinguished.

There is no contradiction between ID1(3) and ID1(5). The wording included at ID1(5) allows for the appropriate delivery and timing of key infrastructure in relation to determining planning applications. The use of Grampian conditions relating to the phasing of development and associated necessary infrastructure delivery / timing may be considered in line with this policy.

A reordering of the elements under ID1 is proposed to address the clarity of the policy and logical clustering of statements in relation to planning applications.

Mole Valley DC - Transport

- Development at Wisley Airfield would give rise to a significant increase in vehicle movements. The nearest principal road, the A3, and other nearby trunk routes, M25, A317, A319, are all heavily congested. It is therefore likely that traffic will seek to make use of less congested routes, particularly at peak periods, encouraging 'rat running' and avoidance activities on the local rural road network to the south of the site, and southern roads such as the A246. Significant additional traffic on these roads would have an adverse effect on land within Mole Valley. MVDC would also ask that a Traffic Impact Study, which includes mitigation measures should be submitted as part of any application.

Highways England is progressing the development of a major scheme for the improvement of the M25 Junction 10/A3 Wisley interchange, as required by the Road Investment Strategy: for the 2015/16 – 2019/20 Road Period (Department for Transport, March 2015) (hereafter the RIS). The RIS identifies the M25 Junction 10/A3 Wisley interchange scheme as a scheme which will enter construction in this Road Period, provided that the necessary statutory approvals are granted and the scheme continues to demonstrate value for public money (p.30). The scheme is proposed to relieve congestion and improve safety. This scheme is referenced as SRN3 in the Submission Local Plan's Infrastructure Schedule.

New north facing junctions to the A3 are proposed at the A247 Burnt Common interchanges, referenced as schemes SRN9 and SRN10. These junctions are being promoted to mitigate the impact of the level of strategic planned growth and in particular the development traffic flows resulting from the development of a new settlement at the former Wisley airfield (site allocation Policy A35), as well as limiting any increase in traffic joining and leaving the A3 at the Ockham interchange.

These schemes will encourage traffic to use the Strategic Road Network and A roads rather than rat-runs on minor roads.

A Transport Assessment will be required in support of a planning application for a strategic site such as the former Wisley airfield.

<p>Mole Valley DC - Education</p> <ul style="list-style-type: none"> • Previous concerns raised that the development of the Wisley Airfield site had the potential to put additional pressures on the need for secondary school places both in GBC and MVDC. Of particular concern was pressure on places at Howard of Effingham School, which would result in cross-boundary issues, particularly for residents in Bookham, for whom Howard of Effingham is the most popular local secondary school. Given the above, MVDC are pleased to see the allocation of a secondary school within the Wisley Airfield site, as well as a primary school as previously proposed. 	<p>Primary and secondary school provision at the Wisley site is listed in the Infrastructure Schedule at Appendix C of the Submission Local Plan. GBC will continue to consult with all neighbouring authorities and Surrey CC as the education authority on potential development of the Wisley Airfield site.</p>
<p>Mole Valley DC - Health</p> <ul style="list-style-type: none"> • The allocation at Wisley Airfield will result in a significant increase in the local population, and it is noted that no specific provision has been made for primary health care. MVDC would expect GBC to consult with both Guildford and Waverley and Surrey Downs CCGs in order to address any cross-boundary issues that may result in a deficit of primary health care places in MVDC, specifically Bookham where the draft NHP has identified an existing need. <p>It may be beneficial if any consultation on this topic would include NHS England South East Region and that development aligns with the strategic transformation plan as agreed by the Surrey Heartlands Collaboration, which includes social care and health.</p>	<p>A GPs surgery with pharmacy at the site is listed in the Infrastructure Schedule at Appendix C of the Submission Local Plan. GBC will continue to consult with all neighbouring authorities and Health partners on potential development of the Wisley Airfield site.</p>

<p>Mole Valley DC - Waste</p> <ul style="list-style-type: none"> With regard to the comment in Key Considerations of Policy A35 (Land at former Wisley Airfield) regarding the waste allocation. It would be expected that consultations with SCC would be carried out regarding the need for alternative locations if required. <p>Upgrades to Thames Water wastewater treatment works were mentioned in the refusal of the original planning application on the site. It would be expected that consultations with Thames Water would continue on this matter and that the upgrades would be carried out in time to support any proposed development and mitigate any impact on provision outside GBC.</p>	<p>GBC will continue to consult with all neighbouring authorities and Surrey CC as the Minerals and Waste authority on potential development of the Wisley Airfield site.</p> <p>GBC will continue to consult with Thames Water on this matter. Upgrades to the wastewater treatment works are listed in the Infrastructure Schedule at Appendix C of the Submission Local Plan.</p>
<p>Woking Borough Council – Transport / traffic</p> <ul style="list-style-type: none"> Woking Borough Council will be concerned if there are any unmitigated traffic implications of the development proposals in the Draft Local Plan 2016 on Woking borough. The development of some of the strategic sites identified in the Local Plan such as the former Wisley Airfield would potentially have significant traffic implications in Woking if the impacts are not addressed. The implications of developing the proposals in the Plan on the road network such as the A3 corridor would be severe if appropriate mitigation is not identified and delivered as part of developing the sites. Appendix C of the Local Plan sets out the transport infrastructure projects identified to support the delivery of the Plan. This includes a number of projects to improve the A3 corridor and other road networks with indicative costings and funding sources. Woking Borough Council is aware that Highways England is still in the process of testing various options for A3 corridor improvements. The outcome of this work is not yet known. It is expected that the outcome of the work will be reflected in the Local Plan and if necessary used 	<p>The Guildford Borough Proposed Submission Local Plan “June 2016”: Strategic Highway Assessment Report (Surrey CC, June 2016) (hereafter the SHAR 2016) assessed the potential traffic impacts of the Draft Local Plan 2016 on the surrounding highway network within other neighbouring borough/district areas. Table 4.13 and paragraph 4.13.10 set out the potential unmitigated traffic impacts of roads into the borough of Woking.</p> <p>Policy ID3, point (7), requires new development in Guildford borough to provide and/or fund the provision of necessary mitigation which ‘will maintain the safe operation and the performance of the Local Road Networks and the Strategic Road Network to the satisfaction of the relevant highway authority’.</p> <p>The implementation of the three Road Investment Strategy (RIS) schemes during the Plan period, alongside other critical infrastructure, is required in order to be able to accommodate future planned growth both outside and within the borough.</p>

<p>to refine the projects set out in Appendix C. Any adverse impacts should be appropriately addressed to ensure the sustainable delivery of the Local Plan without exacerbating the existing traffic conditions in Woking.</p>	<p>Policies in the Draft Local Plan 2017 manage the risks arising from the uncertainties regarding the delivery and timing of delivery of the key infrastructure on which the delivery of the Plan depends, including the three Road Investment Strategy (RIS) schemes. See Policy ID1, particularly at points (4) and (5). Point (4) refers to the key infrastructure as being 'set out in the Infrastructure Schedule at Appendix C, or any updates in the latest Guildford borough Infrastructure Schedule'. Policy ID3, at point (8), contains similar phrasing. Also in this regard, site policies A24 at requirement (2), A25 at requirement (9), A26 at requirement (9) and A35 at requirement (5) are relevant and use phrasing similar to that in Policy ID1 at points (4) and (5).</p>
<p>Woking BC - Education</p> <ul style="list-style-type: none"> Concern that the provision of secondary schools indicated at Appendix C has no delivery timetable / responsibilities for delivery. It will be helpful if an indicative date for their provision is provided and are aligned to when development is likely to come forward. 	<p>Secondary school place needs will be re-assessed at the time a planning application is determined. Any recent new secondary school provision will be taken into account to ascertain needs at the time.</p>
<p>Highways England</p> <ul style="list-style-type: none"> In its representation on the Draft Local Plan 2016 dated 18 July 2016, Highway England raised concerns regarding the advancement of a spatial strategy which is reliant on the delivery of the three RIS schemes: <ul style="list-style-type: none"> With respect to the schemes at M25 Junctions 10-16 and the M25 Junction 10/A3 Wisley interchange with construction anticipated to commence in Road Period 1 (2015/16 to 2019/20), Highways England stated that 'at this time there is not a detailed design to demonstrate the level of growth the schemes might facilitate' (p.2) With respect to the A3 Guildford scheme with construction anticipated to commence in Road Period 2 (2020/21 to 2024/25), Highways England stated that 	<p>Following a meeting on 1 September 2016 to explain and clarify the approach taken to this matter in the Draft Local Plan 2016, Highways England, in a letter dated 5 October 2016, withdrew its previous representation of 18 July 2016 with respect to these issues as follows:</p> <p><i>'We support Guildford's commitment to work with Highways England to develop improvements to the A3 and M25. It is noted from the Local Plan, the implementation of the three RIS schemes during the plan period is required in order to be able to accommodate planned growth.</i></p> <p><i>Highways England is committed to commence construction of two RIS1 schemes during roads period 1, namely M25 Junction 10/A3 Wisley Interchange and M25 Junction 10 – 16. Work is ongoing on a number of options but there is not a detailed design available at this</i></p>

<p>'it is not considered "sound" to base the Local Plan on the A3 RIS 2 scheme' (p.3).</p>	<p><i>time. ...</i></p> <p><i>You will be aware that Highways England is currently developing options for a potential scheme on the A3 in Guildford, capable of being delivered in the next roads period (2020-2025), subject to the normal value for money being applied.</i></p> <p><i>We note that the delivery of housing in the later stages of the plan period is dependent upon a major improvement to the A3 through Guildford. It is essential that the Local Plan provides the planning policy framework to ensure development does not come forward in advance of critical infrastructure. As a result of clarification received at our recent meeting, it is now understood how the Local Plan intends to do this.' (p.1-2).</i></p>
<p>Transport for London</p> <ul style="list-style-type: none"> TfL is working to implement the recommendations of the National Infrastructure Commission relating to the delivery of growth associated with Crossrail 2. From a strategic transport perspective, Crossrail 2 would release capacity on rail corridors that are used by trains to/from Guildford and thereby help to support future development within the borough, although Crossrail 2 would not directly serve any stations within Guildford. Explicit support for Crossrail 2 and a recognition of its important contribution to delivering future growth as set out in the Local Plan would be welcomed. 	<p>The Infrastructure Schedule includes scheme NR5, which concerns Portsmouth Direct Line improvements (together with South West Main Line Peak Demand improvements), facilitating increased service frequency.</p> <p>Network Rail's Wessex Route Study (August 2015) proposes a strategy, including "choices for funders" for the Department for Transport to consider, which addresses the challenge of accommodating projections for growth to 2043.</p> <p>Options are set out, including the Crossrail 2 scheme, which in combination would remove the capacity constraint on the South West Main Line between Surbiton and Waterloo and allow for an additional 13 trains per hour peak services forecast to be required by 2043. The Government has subsequently announced funding for the Crossrail 2 scheme in the Budget in March 2016. Schemes to provide grade separation at Woking Junction and an additional through platform at Woking station will also be required.</p>

Network Rail

- Network Rail encourage the Council to include contributions towards the delivery of station improvements and new stations in the CIL and retain the flexibility in the application of a CIL levy such that where a site is already directly contributing to infrastructure or transport improvements it would not be further burdened by CIL contributions. The rationale for this is to not blight development of such sites which may become financially unviable if the combined CIL, S.106 and affordable housing burden is too great.

A balanced approach to infrastructure should be applied and suggest that it would be appropriate to delete paragraph 4, allowing the Council address the nature of each development site and proposal as appropriate.

In the Draft Local Plan 2017, in the Infrastructure Schedule at Appendix C, all instances of 'developer contributions' were changed to 'developer funded' in the column for 'Likely cost (where known) and funding source'. The term 'developer funded' encompasses:

- direct improvements made by developer(s) including under a S278 Agreement (Highways Act 1980)
- funding provided by developer(s) by way of Section 106 agreement (Town and Country Planning Act 1990)
- funding provided by developer(s) by way of Community Infrastructure Levy (CIL) contributions.

Therefore the Infrastructure Schedule provides flexibility as to the means by which appropriate schemes will be, in part or in full, developer funded. Further consultation on CIL will be undertaken in preparation for introducing the levy in Guildford borough. The Regulation 123 list (to be developed) is intended to provide greater clarity on what infrastructure items CIL may be spent on and where s106 obligations would not be sought.

The protection of the SPA from the impacts of development is enshrined in law. Therefore, unlike other planning obligations, protection of the SPA is non-negotiable and it is appropriate that priority is given to the SPA over other contributions.

Thames Water

- Thames Water support Policy I1 and supporting text in principle, but consider that minor changes would be helpful to provide clarity.

Thames Water support the identification of water supply and waste water treatment infrastructure at paragraph 4.6.3, but given the importance of such infrastructure (ref NPPF 156 and 162 and NPPG 34-001-20140306) to sustainable development, it is considered that text along the following lines should be also included to support Policy I1 :

- *“The Council will seek to ensure that there is adequate water supply, surface water, foul drainage and waste water treatment capacity to serve all new developments. Developers will be required to demonstrate that there is adequate waste water capacity and surface water drainage both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing wastewater/sewerage infrastructure. Drainage on the site must maintain separation of foul and surface flows. Where there is an infrastructure capacity constraint the Council will require the developer to set out what appropriate improvements are required and how they will be delivered.*

The development or expansion of water supply or waste water treatment facilities will normally be supported, either where needed to serve existing or proposed new development, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or

The suggestion regarding additional wording is considered to be too detailed for strategic nature of the Local Plan policy.

The Submission Local Plan’s Infrastructure Schedule (Appendix C) identifies key water and wastewater infrastructure to support planned growth during the plan period. Strategic site allocations included in the Local Plan cross reference these requirements.

Furthermore, the requirement for timely provision of infrastructure is reinforced as a basis for approval of planning applications (see Policy ID1(3)).

Comments are in many cases already included in the Infrastructure Delivery Plan, 2017 (IDP). Updates to the IDP will provide the opportunity to include further clarification as noted by Thames Water as well as responding to changing circumstances over time.

Policy P4(5) and the IDP make allowance for circumstances where SuDS are not considered appropriate and this Policy has been updated to require “that land drainage will be adequate...”.

environmental impact that any such adverse impact is minimised.”

It should be recognised that SuDS are not appropriate for use in all areas, for example areas with high ground water levels or clay soils which do not allow free drainage.

Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system.

With regard to surface water drainage, the following paragraph should be included “It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.”

Where development is being proposed within 800m of a sewage/waste water treatment works, the developer or local authority should liaise with Thames Water to consider whether an odour impact assessment is required as part of the promotion of the site and potential planning application submission. The odour impact assessment would determine whether the proposed development would result in adverse amenity impact for new occupiers, as those new occupiers would be located in closer proximity to a sewage treatment works.

Where development is being proposed within 15m of a pumping station, the developer or local authority should liaise with Thames Water to consider whether an odour and / or

<p>noise and / or vibration impact assessment is required as part of the promotion of the site and potential planning application submission. Any impact assessment would determine whether the proposed development would result in adverse amenity impact for new occupiers, as those new occupiers would be located in closer proximity to a pumping station.</p> <p>Where any such odour study in relation to development near a sewage treatment works or pumping station identifies there is an odour impact for proposed development and no improvements are programmed by the water company, then the developer needs to contact the water company to agree what improvements are required and how they will be funded prior to any occupation of the development.</p>	
<p>Thames Water (2017)</p> <ul style="list-style-type: none"> Thames Water still support the amended Policy I1 (now Policy ID1) and supporting text in principle as it is largely in line with previous representations, but consider that the additional text and water/wastewater infrastructure should still be included. <p>Thames Water support the identification of water supply and waste water treatment infrastructure at paragraph 4.6.3, but given the importance of such infrastructure to sustainable development, it is considered that text along the following lines should be also included to support Policy ID1: “The Council will seek to ensure that there is adequate water supply, surface water, foul drainage and waste water treatment capacity to serve all new developments. Developers will be required to demonstrate that there is adequate waste water capacity and surface water drainage both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund</p>	<p>The point is noted. In this regard, a minor modification to the “Reasoned Justification” section under ID1 has been proposed, which seeks to add clarity on this matter, although not including the level of detail proposed.</p> <p>See also responses to 2016 comments, The Submission Local Plan’s Infrastructure Schedule (Appendix C) identifies key wastewater infrastructure to support planned growth during the plan period. Strategic site allocations included in the Local Plan cross reference these requirements.</p> <p>Furthermore, the requirement for timely provision of infrastructure is reinforced as a basis for approval of planning applications (see Policy ID1(3)).</p>

<p>studies to ascertain whether the proposed development will lead to overloading of existing wastewater/sewerage infrastructure. Drainage on the site must maintain separation of foul and surface flows. Where there is an infrastructure capacity constraint the Council will require the developer to set out what appropriate improvements are required and how they will be delivered. The development or expansion of water supply or waste water treatment facilities will normally be supported, either where needed to serve existing or proposed new development, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact that any such adverse impact is minimised.”</p>	
<p>Environmental Agency (2017)</p> <ul style="list-style-type: none"> • The policy may benefit from incorporating some of the recommendations that came from the Water Quality Assessment (WQA) undertaken by AECOM. <p>For major developments in the Guildford, Ripley, and Ash Vale Sewage Treatment Works (STW) catchments it is recommended that the council embeds a development control policy within the local plan. This could require developers to provide evidence that they have consulted the sewer undertaker regarding capacity of the sewer network. Drainage strategies should also be submitted as part of the application to enable the sewer undertaker and the Environment Agency to fully assess the potential impacts on the sewer network. Developments should not be occupied before capacity of the sewer network to accommodate flows and capacity at the works is in place to treat to the required standard. For cases where capacity is not in place, the council could include wording in the policy on Grampian conditions.</p>	<p>The point is noted. In this regard, a minor modification to the “Reasoned Justification” section under ID1 has been proposed, which seeks to add clarity on this matter, although not including the level of detail proposed.</p> <p>The Submission Local Plan’s Infrastructure Schedule (Appendix C) identifies key wastewater infrastructure to support planned growth during the plan period. Strategic site allocations included in the Local Plan cross reference these requirements.</p> <p>Furthermore, the requirement for timely provision of infrastructure is reinforced as a basis for approval of planning applications (see Policy ID1(3)).</p>

<p>Sussex and Surrey Police</p> <ul style="list-style-type: none"> • Infrastructure is not limited to buildings. Suggest guidance under 4.6.2 referring to “police stations” is replaced by “police infrastructure.” 	<p>Minor modification proposed to address concern.</p>
<p><i>Representations on Specific Issues</i></p>	
<p><i>Inadequate infrastructure planning:</i></p> <ul style="list-style-type: none"> • The planning for infrastructure to support development in the Local Plan is inadequate (and not in line with NPPF paragraph 157) as there is: <ul style="list-style-type: none"> • a lack of detailed strategic plan/strategy and/or delivery plan to support development and insufficient detail of plans for infrastructure improvements; • an issue with the approach adopted, which should first have assessed the borough's infrastructure capacity and recognise it as a key constraint, and then tailor development accordingly; • a lack of application of constraints applied to the housing need. <p>The result is an overinflated, excessive development quantum that will have a severe detrimental impact on the road network and would overwhelm infrastructure more broadly.</p>	<p>There has been significant consideration of the infrastructure needed to support the Submission Local Plan. The IDP provides detail on the infrastructure needed to support the development included in the plan. This has informed the detailed preparation of the Infrastructure Schedule at Appendix C of the Submission Local Plan. This planning aligns with paragraphs 21 and 31 of the NPPF in relation to identification of priority areas for infrastructure provision, and developing strategies for its provision to support sustainable development.</p> <p>The IDP is regarded as a live document, and its Infrastructure Schedule will be reviewed and modified as required during the plan period as further information becomes available.</p> <p>As required (NPPF paragraph 162), the Council has been working with infrastructure providers and other authorities to assess the quality and capacity of existing infrastructure. This has progressed, taking into account the planned location and quantum of development proposed in the Submission Local Plan and the delivery of required supportive infrastructure.</p> <p>Planned new development as proposed in the Submission Local Plan is acknowledged to have a key dependency on planning for and the delivery of supportive infrastructure. This dependency is emphasised throughout the Plan, through the Spatial Vision, policies and inclusion of an Infrastructure Schedule.</p>

<ul style="list-style-type: none"> The changes made to infrastructure proposals in 2017 fail to address: <ul style="list-style-type: none"> the inadequacies of the existing infrastructure and further detail required to determine new requirements (e.g. in Horsley); the stated objective of providing infrastructure to support the proposed developments. <p>The infrastructure changes should be viewed borough-wide and not in isolation. Needs should be considered now, not left until planning applications for sites are received.</p>	<p>See previous responses. The Infrastructure Schedule and IDP have been updated as the result of new information where this has been available. The IDP is regarded as a live document and its Infrastructure Schedule will be reviewed and modified as required during the plan period as further information becomes available.</p> <p>The development management process for planning applications will involve the further consideration of appropriate mitigation for development proposals. This could result in the imposition of planning conditions or obligations linked to infrastructure provision over and above items listed in the Infrastructure Schedule and that are only evident through the detail that emerges from the application process (e.g. through developer-funded specialist studies into drainage capacity on and off site).</p>
<p><i>Inadequate funding provision for infrastructure:</i></p> <ul style="list-style-type: none"> There is a concern regarding the likely lack of funding for required infrastructure and dependencies of development on this infrastructure given: <ul style="list-style-type: none"> the borough's infrastructure is already heavily strained; proposed large housing estates significantly increase the need for infrastructure investment without securing the means for its provision or guaranteeing its delivery; future CIL income will not cover requirements; the critically dependency on providers outside the Council's control (e.g. Surrey County Council); developers, who should fund the bulk of infrastructure upgrades, will manage to avoid these contributions (and affordable housing requirements); The large funding gap (£518 million, which is equivalent to 55% of the total infrastructure cost) reflected in the Surrey Infrastructure Study (2016). 	<p>Policy ID1 is targeted to ensure the timely provision of infrastructure necessary to support new development. If not, this would be sufficient grounds for refusal of an application.</p> <p>The approach to funding and delivering infrastructure is set out in the IDP, "Funding and Delivering Infrastructure" (1.22 – 1.39).</p> <p>It is acknowledged that infrastructure funding is required beyond contributions from developers. Delivery of infrastructure is also reliant on wider funding streams from, for example, Central and Local Government, infrastructure providers and the Local Enterprise Partnership. The preparation of the Infrastructure Schedule (at Appendix C of the Submission Local Plan) acknowledges this and sets out the key infrastructure needed, and the sources of funding for delivery of the plan.</p> <p>The Submission Local Plan provides the basis for planning for the delivery of and funding for necessary infrastructure in a planned coordinated manner across multiple stakeholders. It also</p>

Furthermore, specific concerns were raised regarding developers using viability as a reason why infrastructure cannot be funded:

- developers will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable;
- developers will continue to require their sites to be assessed on the local impacts of their scheme (development being allowed as long as that impact is not 'severe');
- viability concerns where only the largest sites are likely to afford to provide on-site infrastructure.

acknowledges the need to be flexible and respond to changing circumstances with the IDP Infrastructure Schedule regarded as a living document that will be revised in line with new detail (especially later in the plan period).

With regard to the infrastructure funding gap, it is acknowledged that a gap exists. The presence of an infrastructure funding gap provides a basis for motivating for the adoption of a CIL. The quantum of funding available from non-developer sources is likely to change as government funding regimes change, information is updated, or plans of infrastructure providers are developed further.

In relation to viability of development, the Council has undertaken a Local Plan and CIL Viability Study (2016) and Local Plan Viability Update (2017) – see published evidence base. This demonstrates that the policy requirements of the plan (including affordable housing provision) do not unduly burden residential and non-residential development. Furthermore, the Study reflects viability for CIL (and hence the potential for contribution to infrastructure) across a range of development types over and above Local Plan policy requirements.

Inadequate means to secure delivery of infrastructure when it is needed:

- The local plan provides inadequate guarantees that infrastructure will be available when needed (with or in advance of development). In this regard:
 - Policy I1 includes weak wording such as "should" and the "reasoned justification" suggests (at 4.6.8) that the Council will be prepared to negotiate on infrastructure requirements, implying that significant developments may be delivered without the required infrastructure. Wording must be amended to say "infrastructure required to support development MUST be provided..."
 - Policy I1 is contradictory. It states its aim as being "*To support delivery of this Local Plan, infrastructure needed to support development should be provided and available when first needed to serve the occupants and users of the development...*" However it then goes on to say "*where the timely provision of necessary supporting infrastructure is not secured, development may be phased to reflect infrastructure delivery, or will be refused.*" Either it is to be provided and available when first needed or it is not.
 - the policy should be amended so as to read "*We will ensure that infrastructure needed arising from a proposed development is provided and available when first needed to serve the occupants and users of the development and so as to ensure that no adverse impact or reduction in capacity is suffered by the existing residents of the settlement. This will be secured by planning obligation, planning condition, or from other infrastructure funding, including the Community Infrastructure Levy.*" The final sentence of this paragraph should be deleted.

The plan is premised on the provision of new infrastructure to support the delivery of sites allocated in the plan (see Submission Local Plan: Foreword pg.5)

The wording of ID1 has been modified, but not as suggested. Policy ID1 has been strengthened with 'should' replaced with 'will.'

The reasoned justification has been adjusted. It is nevertheless important to ensure that exceptions are catered for, for instance where there are significant or out of the ordinary remedial costs related to a specific (in many cases brownfield) site, which need to be factored into viability determination in order for it to be delivered.

Particular development thresholds during the course of a (major) development may reflect step changes in the associated requirement for related infrastructure, hence the allowance for phasing of development. New phases of development may be linked with particular infrastructure requirements via the planning system. See Transport Topic Paper (2017).

- There are continued concerns regarding the perceived inadequacy of proposed policy in relation to guaranteeing delivery of infrastructure when needed.

Various objections raised / proposals made relating to the policy and specific wording including:

- ID1(1), delete – “and available when first needed to serve the development’s occupants and users” and replace with “prior to the development being first occupied.”
- Policy ID1(2) may not be lawfully enforceable by planning condition or planning obligation due to, at least in part, the need to fix historic problems.
- Objections to the changes in Policy ID1(2) and (3) as this might imply that the provision of necessary infrastructure to unlock development may not be “secured” within five years and the Plan therefore runs counter to the NPPF [47, footnote 11] – means delivery of sites may be threatened.
- ID1(5) should be deleted as it weakens the provisions of paragraph 2 of the Policy, invites developers to exploit it, and would be challenged at planning appeals. It hints that there could be an acceptable formula for delaying the delivery of infrastructure.

Further to these concerns, the suggestion was made that the Local Plan should make it clear that site development should not be allowed to proceed unless strong and satisfactory guarantees or undertakings to provide the essential elements of the infrastructure needed, have been given by developers and other bodies providing those elements and that they will be in place.

The current wording of paragraph ID1(1) is considered appropriate. Certain items of infrastructure may only be triggered or required at a particular point in time – there is a need to allow for phasing of development linked to when particular infrastructure is required.

It is not considered that there is a contradiction between ID1(2) and the statutory tests for imposing planning conditions or obligations as part of the development management process. However, the word “necessary” (infrastructure) has been proposed to be added to this policy to add clarity.

ID(2) and ID(3) are considered to strengthen policy with regard to provision of infrastructure. The Infrastructure Schedule provides detail on the delivery of infrastructure necessary to support proposed development. The LAA, prepared as evidence to the Local Plan, informs a judgement of when sites are likely to be delivered and includes consideration of known infrastructure requirements.

The wording included at ID1(5) allows for the appropriate delivery and timing of key infrastructure in relation to determining planning applications. The use of Grampian conditions relating to the phasing of development and related infrastructure delivery / timing may be considered in line with this policy.

ID1(5) cannot be read in isolation of the other paragraphs. Should attaching planning conditions or obligations (ID2) not be possible to secure timely required infrastructure provision, planning permission will be refused as per ID1(3). A reordering of the elements under ID1 will be pursued to address the clarity of the policy.

The IDP, and subsequent updates to the Infrastructure Schedule, provides the basis for the delivery of key infrastructure necessary to support delivery of the plan. It will also provide an informant to the planning and budgeting of Infrastructure providers.

<ul style="list-style-type: none"> Despite changes (to 4.6.8), developers will still be able to avoid fully funding infrastructure requirements or making contributions to affordable housing based on viability arguments. The plan should have more teeth with regard to application of guidance on viability assessments. 	<p>Viability concerns are addressed under the “Reasoned Justification” section at Policy H2.</p> <p>The changes to 4.6.8 intend to provide clarity. With regard to granting planning permissions, policy provisions under ID1 remain applicable, including specifically the requirement for securing timely provision of infrastructure.</p>
<ul style="list-style-type: none"> The policy should include the following: “The phasing of development in conjunction with off-site infrastructure provision/improvements will be considered on a site by site basis, acknowledging planned investments, the nature of the proposals and that there are sites that may be better placed to proceed in advance of others.” 	<p>The additional detail proposed is not regarded as being necessary. Each application needs to be considered on its merits.</p>
<p><i>Emphasis on Greenfield development – negative implications for infrastructure planning and delivery:</i></p> <ul style="list-style-type: none"> Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number. <p>Targeting development within the Green Belt requires larger infrastructure investment, which will require higher investment nobody is willing to pay for/ unnecessary barriers for development. CIL also priorities Greenfield development first.</p> <p>There is a failure to recognise that out of town settlements have particularly high requirements for additional new basic infrastructure (roads, sewers, water provision, electricity, gas, telephone and broadband links) and in many cases the links to existing services will need to be upgraded before these can be implemented.</p> <p>Failure to include town centre masterplan, which could reduce pressure on the Green Belt.</p>	<p>The Submission Local Plan sets out the preferred locations for development (making the best use of previously developed land – see 4.1.6). This includes allocations considered deliverable during the plan period in the Guildford Town Centre. However, these locations cannot accommodate all of the new development needed. Thus, allocations are made in other areas including greenfield development with a large proportion ‘clipping on’ to existing infrastructure networks adjacent to Guildford’s urban area.</p> <p>Appendix C Infrastructure Schedule includes infrastructure necessary to meet requirements of the Local Plan 2015-2034. The Local Plan and CIL Viability Study (2016) – see published evidence base reflects viability for contribution to infrastructure across a range of development types and scales and both in Greenfield and Brownfield locations.</p> <p>The Town Centre Masterplan was an aspirational document and not necessarily deliverable. It did not treat issues such as flooding, ownership and leases as constraints. Further work is being undertaken to help progress and deliver appropriate town centre sites</p>

<p>The proposals within the masterplan could affect infrastructure, specifically traffic in the outlying villages. The plan has not considered these impacts.</p>	<p>by the Major Projects team in the Council. These are identified in the Council's Town Centre Regeneration Strategy (2017).</p>
<p><i>Existing deficit of transport infrastructure / congestion:</i></p> <ul style="list-style-type: none"> The schemes proposed will not solve existing congestion issues and would require measures that cannot be delivered (demolishing properties, widening the A3). The local road network has not been given sufficient consideration in terms of congestion issues. <p>Existing network already at capacity – resulting in issues including lack of resilience, which mean impact should be considered 'severe' as per NPPF.</p> <p><i>Existing traffic is already congested in the following areas:</i></p> <ul style="list-style-type: none"> Send; Ripley (including the Newark Road and Rose Lane junction in the centre of Ripley); <p>Clandon (including the A247 through West Clandon - inadequate width, lighting and inadequate speed control, pinch points in the centre of West Clandon village that requires lorries travelling in opposite direction to mount the pavement to pass);</p> <p>Horsley (including the development at Wisley, there would be upwards of 6,000 additional cars within a three mile radius of the Horsleys; A246, Ockham Rd South and Ockham Rd North);</p> <p>Ash (including an extra 729 houses proposed in Ash; resulting in over 2000 extra people including 700 to 800 children not to mention over 1500 extra cars; where will all the extra cars go we can expect gridlock, impacts on the Hog's Back). Ash rail crossing backs up heavily at peak time.</p>	<p>Policy ID1 states that the Infrastructure necessary to support new development will be provided and available when first needed to serve the development's occupants and users and / or to mitigate its otherwise adverse material impacts.</p> <p>The Guildford Borough Proposed Submission Local Plan "June 2016": Strategic Highway Assessment Report (Surrey CC, June 2016) (hereafter the SHAR 2016) represents a robust "worst case" in terms of transport demand and supply assumptions, as it does not assess and therefore does not account for the mitigation; including the potential for modal shift, and the new and improved sustainable transport choices provided by the rail, bus and active modes schemes included in the Draft Local Plan 2016 and makes no allowance for any internalisation of trips within the larger sites.</p> <p>The total mileage and the total number of vehicle hours travelled on the borough's highway networks is forecast to increase, with or without a Submission Local Plan. For instance, based on the SHAR 2016 models, even with no future development in Guildford borough, total mileage will increase by 12 per cent between 2009 and 2031 in the average morning peak hour, driven by development elsewhere and changes in demographic profile and car ownership.</p> <p>In 2031, with the Draft Local Plan 2016, there is a 2 per cent increase in the average morning peak hour and a 2 per cent decrease in the average evening peak hour in the average speed of vehicles on the borough's highway network, compared to a theoretical future in which there is no development and are no new highway schemes in Guildford borough.</p>

The SHAR 2016 concludes that “The results show that for Scenario 5, which represents the quantum and distribution of development proposed in the Proposed Submission Local Plan together with the key highway schemes, there will not be a severe impact on the local and strategic highway network” (p.62). The addendum to the SHAR 2016 (Guildford BC, June 2017) found that this conclusion was “not considered likely to change” as a result of the key changes made to proposed site policies and to the programme of transport schemes in the Draft Local Plan 2017.

The residual cumulative transport impacts of planned development in the Draft Local Plan are not considered to be severe, and so will not fail the policy test set by paragraph 32 in the NPPF.

As the local planning authority, we are required by the NPPF to work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development (paragraph 31). We are also required to set out strategic policies to deliver transport infrastructure in our new Local Plan (paragraph 156). We have regularly met with Highways England (formerly the Highways Agency), as well as other transport providers, to discuss these matters with respect to the local plan making. The A3 Guildford Road Investment Strategy (RIS) scheme is complicated and may involve land acquisition and planning permission and/or development consent.

The implementation of the three RIS schemes during the Plan period, including the A3 Guildford RIS scheme, alongside other critical infrastructure, is required in order to be able to accommodate future planned growth both outside and within the borough. Accordingly, Policy ID1 at points (4) and (5), as well other policies in the Submission Local Plan, require regard to be had to the dependencies between planned development and key infrastructure schemes.

The Infrastructure Schedule sets out a significant programme of

	<p>transport schemes to mitigate the principal transport impacts of planned development in the Submission Local Plan. The process by which the Council identified key transport schemes for inclusion in the Infrastructure Schedule is described in the Transport topic paper (2017).</p> <p>New developments that will generate significant amounts of movement will, at the planning application stage, be supported by a Transport Statement or Transport Assessment, and subject to the policy tests in NPPF paragraph 32 and Policy ID3. Individual new developments may be required to provide mitigation measures additional to those in the Infrastructure Schedule.</p>
<p><i>Inadequacy of transport evidence base:</i></p> <ul style="list-style-type: none"> No evidence or traffic modelling data is available to demonstrate whether 'improvements' will indeed improve anything at all given the additional traffic that will be generated by the new developments included in the plan. <p>The Council's methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds.</p>	<p>The transport evidence base is considered to be adequate and proportionate. Further information is provided in the Transport topic paper (2017).</p> <p>Specifically, the Strategic Highway Assessment Report: Guildford Borough Proposed Submission Local Plan “June 2016” (Surrey County Council, June 2016) (hereafter the SHAR 2016) is a technical report on the strategic highway assessment of the spatial strategy in the Draft Local Plan 2016. The addendum (Guildford Borough Council, 2017) is a high-level review which considers the potential changes to traffic impacts – from those reported in the SHAR 2016 – which are expected as a result of the key changes made to the proposed site allocations and to the programme of transport schemes as identified in the Draft Local Plan 2017.</p> <p>The SHAR 2016, which uses an ‘average peak hour’ approach to assess potential traffic impacts, was prepared by Surrey County Council, the Local Highway Authority. Highways England, which is responsible for the Strategic Road Network, has accepted the use of this approach, when supplemented by assessments of the Guildford section of the A3 trunk road in the period to 2024, the earliest date for</p>

	<p>the start of construction of the A3 Guildford scheme, in respect of mainline queuing resulting from blocking back of traffic exiting at diverge junctions in the peak periods, the operation of merging and diverging at junctions in the peak periods, and impact on peak spreading.</p> <p>The SHAR 2016 included traffic junctions and signals in its models, and assessed their performance, where these have a significant effect in terms of delay or route choice.</p> <p>The transport evidence base is considered to be proportionate and sound. Further information is provided in the Transport topic paper (2017).</p>
<p><i>Changes to Policy ID1 based on flawed strategic highway assessment:</i></p> <ul style="list-style-type: none"> Object to the fact that the changes within Policy ID1 (and indeed the whole policy) are based on flawed traffic modelling in spite recommendations from Highways England and other commentators on the Local Plan that the modelling should be revised using the latest OmniTRANS software tool. 	<p>The transport evidence base is considered to be proportionate and sound.</p> <p>In its representation of 18 July 2016 on the Draft Local Plan 2016, Highways England raised concerns, including that the SHAR 2016 was deficient. Following a meeting in September 2016 to discuss these concerns, including exploring the approach that had been taken in the Draft Local Plan 2016 and its evidence base, Highways England withdrew its representations and supplanted these with new advice and commentary (see Highways England letter dated 5 October 2016). Further information is provided in the Transport topic paper (2017).</p> <p>In short, Highways England has accepted the use of this approach, when supplemented by assessments of the Guildford section of the A3 trunk road in the period to 2024, the earliest date for the start of construction of the A3 Guildford scheme, in respect of mainline queuing resulting from blocking back of traffic exiting at diverge junctions in the peak periods, the operation of merging and diverging at junctions in the peak periods, and impact on peak spreading.</p>

<p><i>Poor condition of existing transport infrastructure:</i></p> <ul style="list-style-type: none"> Poor road condition on the following links: East Lane, Rose Lane (Ripley), roads away from High Street Ripley, A247 through West Clandon (winding, dangerous, narrow), Effingham (narrow), Ripley, Send, Send Marsh, Burnt Common, Horsley, East Horsley; <p>Narrow, winding, hilly, roads and lanes, vehicles mounting pavements to allow large vehicles to pass, manoeuvre bends, avoid tree branches, cannot accommodate increased bus use;</p> <p>Lack of provision for pedestrians and cyclists, (discontinuous pavements and routes, lack of space with street car parking and existing properties), which results in increased road safety issues/accidents with cars, lorries and vans striking pedestrians and cyclists.</p>	<p>The Infrastructure Schedule sets out a significant programme of transport schemes to mitigate the principal transport impacts of planned development in the Submission Local Plan. The process by which the Council identified key transport schemes for inclusion in the Infrastructure Schedule is described in the Transport topic paper (2017).</p> <p>New developments that will generate significant amounts of movement will, at the planning application stage, be supported by a Transport Statement or Transport Assessment, and subject to the policy tests in NPPF paragraph 32 and Policy ID3. Individual new developments may be required to provide mitigation measures additional to those in the Infrastructure Schedule.</p>
<p><i>Public transport capacity pressures:</i></p> <ul style="list-style-type: none"> Commuter trains to London from Horsley and Effingham are almost full by the time they arrive in Horsley. How will the commuters from the 2,000 new houses at Wisley and the 533 new houses in the Horsleys get to London? <p>There is nothing in the plan about additional trains or additional station parking.</p> <p>No money in Control Periods 5 or 6 for Network Rail to build new rail stations at Guildford West (Park Barn) and Guildford East (Merrow).</p>	<p>It is considered that there will be sufficient capacity available on peak period rail services to accommodate the additional demand from Horsley and Effingham rail stations.</p> <p>Schemes BT2 and BT3 both relate to site allocation Policy A35 for the Land at former Wisley airfield, Ockham.</p> <p>Scheme BT2 is for a bus interchange at Effingham Junction rail station or alternatively Horsley rail station to enable future site residents and visitors to access rail services.</p> <p>Scheme BT3 proposes a significant bus network to serve the site and key destinations including Effingham Junction railway station and/or Horsley railway station, Guildford, and Cobham to be provided and secured in perpetuity. As part of the sustainability improvements for the site, the requirement for this scheme is also set out in the site allocation Policy A35.</p>

	<p>Local planning authorities are required by the NPPF to work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development (paragraph 31). Local Authorities are also required to set out strategic policies to deliver transport infrastructure in our new Local Plan (paragraph 156). GBC have regularly met with Network Rail, as well as other transport providers including Great Western Railway and South West Trains, to discuss these matters with respect to the local plan making. A programme of rail schemes is included in the Infrastructure Schedule at Appendix C of the Submission Local Plan. This includes schemes to provide for additional rail capacity on both the Portsmouth Direct Line and the North Downs Line.</p> <p>For the Draft Local Plan 2017, proposed changes were included to the range of the delivery dates for the new rail stations at Guildford West (Park Barn) and Guildford East (Merrow). It is now considered that the new rail stations are most likely to be constructed and then brought into operational use during the period between 2024 and 2029, rather than in the period between 2018 and 2029. The period 2024 to 2029 is Control Period 7. August 2024 corresponds with the anticipated start date of the South Western franchise period subsequent to the recently awarded franchise for the 2017-2024 period. Delivery from 2024 allows for the servicing of the new rail stations to be included within that new South Western franchise covering the period from 2024.</p> <p>Schemes NR2 and NR3, in the Infrastructure Schedule, for the delivery of new rail stations at Guildford West (Park Barn) and Guildford East (Merrow), are to be developer funded. The proposed development at Blackwell Farm is required by Policy A26 to provide a necessary and proportionate contribution to delivering the Guildford West (Park Barn) railway station. The proposed development at Gosden Hill Farm is required by Policy A25 to provide land and a necessary and proportionate contribution to delivering the Guildford East (Merrow) railway station.</p>
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School infrastructure planning and delivery:

- IDP admits that new schools are only likely to be made available after residential developments have been largely completed; this would therefore impose worsened education provision on existing residents as well. (Wisley)

It is clear that with the Garlick's Arch site being added that no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools cope, many of which are already at capacity? (Policy I1).

Ripley Parish Council - New homes need schools, health, and other services which are not available in the local area

New Send school will be unable to cope with proposed population/ doesn't have capacity for additional classes, the merger of Send infant and junior schools has no provision for increase numbers.

The local primary school (The Raleigh) nearest in Horsleys is already full and there are no additional places and building expenditure planned. Surrey report on school places is incorrect as Raleigh is already oversubscribed. There is no scope for expansion given the site is fully developed.

There are 11 housing development sites for West and East Horsley, 593 new houses. The two parishes are served by a single primary school - The Raleigh, in West Horsley. Planning guidance suggests that this number of new homes will require the provision of around 150 additional primary school places to accommodate such an increase in population. There is no spare capacity at The Raleigh, yet no proposals are made in the Proposed Submission Draft Local

As part of GBC cooperation with infrastructure providers, Surrey County Council reviewed proposed growth (see IDP, 5.19-5.20). They are satisfied that the education need can be met.

These engagements helped inform the compilation of the IDP and Infrastructure Schedule. These reflect future school needs and planned provision. Detail is included on the proposed location and quantum of additional forms of entry and new school development over the plan period. (see IDP, 5.21 – 5.38). Site allocations in the Local Plan include provision related to schools as a requirement, where appropriate.

The IDP reflects the justification for the timing of delivery of new schools including in relation to the rollout of development on strategic sites (see IDP, 1.27-1.28).

<p>Plan to provide for any more school places in the Horsleys.</p> <p>Howard of Effingham is at full capacity with no plans for expansion. There will be no available school places for newcomers. Secondary school places are already restricted in number at the Howard of Effingham School for children from West Horsley and all other available secondary schools are considerably further afield in either Guildford or Woking. Potential residential development in Effingham and Bookham will exacerbate the problem, as children from these proposed developments would have priority of entry due to being closer.</p> <p>There are insufficient school spaces for the number of local children – means that children are often allocated to schools a significant distance away such as Dorking or Woking.</p> <p>Increased distance for school journeys increases the need for car use and results in congestion. Should encourage housing to be built nearer schools for more sustainable travel.</p>	<p style="text-align: center; opacity: 0.5; font-size: 48px;">Draft</p>
<ul style="list-style-type: none"> • Lack of proper assessment of the potential approaches to infrastructure provision, particularly on education and identifying the deliverability of this infrastructure compared to the site and housing trajectory. Secondary school allocations, for example, now rely almost entirely on the delivery of large strategic sites, which are to be delivered later in the plan period and then over several years. 	<p>As part of GBC cooperation with infrastructure providers, Surrey County Council reviewed proposed growth (see IDP, 5.19-5.20). The level of education need that may be introduced by the Submission Local Plan proposals, the geographic impact of this education need and the likely timescales of the impact have been considered. SCC are satisfied that the education need can be met.</p> <p>Finding places for secondary aged children from the strategic sites in existing schools would be challenging. Provision at strategic sites will be required to meet the need for secondary places from these sites.</p>

School infrastructure funding:

- The Education Funding Agency (EFA) support reference within Policy I1 to securing contributions from developers towards school provision through CIL and s106. The key strategic policies to support this position should be explicitly referenced within the document. In particular:
 - The *National Planning Policy Framework* (NPPF) advises that local planning authorities should take a proactive, positive and collaborative approach to ensuring that a sufficient choice of school places is available to meet the needs of communities and that local planning authorities should give great weight to the need to create, expand or alter schools to widen choice in education (para 72).
 - The Joint Policy Statement from the Secretary of State for Communities and Local Government and the Secretary of State for Education on '*Planning for Schools Development*' (2011) which sets out the Government's commitment to support the development of state-funded schools and their delivery through the planning system.

Propose that Borough consider a similar approach to aid and guide delivery of new schools as London Borough of Ealing's Planning for Schools Development Plan Document (DPD), which includes site allocations and policies to safeguard the sites, and was adopted in May 2016 as part of the Local Plan.

EFA requests sight of updates to the Guildford Draft Local Plan: Education Review (May 2016) to help inform any subsequent response from the EFA.

EFA notes that Gosden Hill and Wisley secondary schools could be run together or separately, depending on phasing and providers.

The Submission Local Plan's Infrastructure Schedule (Appendix C) reflects the provision of new/expanded primary and secondary schools to support planned growth during the plan period. Regarding the need to secure sites for schools, the schedule along with the site allocations included in the Local Plan make explicit requirements for new schools along with the provision of serviced land.

<p><i>Water and waste water and flooding:</i></p> <ul style="list-style-type: none"> There is no strategic plan for upgrade of sewerage and drainage network. Proposal is to upgrade piecemeal, by developers on individual sites. <p>Water supply already struggles – drinking water is limited during droughts.</p> <p>Will increase the incidence of flooding for homes and roads near new development (Send).</p>	<p>The IDP reflects planning for upgrades to the water, sewage and drainage network. It provides detail on the infrastructure needed to support the development included in the plan. This has informed the detailed preparation of the Infrastructure Schedule at Appendix C of the Local Plan.</p> <p>Water and wastewater infrastructure providers have been engaged regarding the development envisaged during the plan period, which will be taken into account in their planning. The IDP clarifies the planning and provision of water (IDP, 3.15-3.41) and wastewater (IDP, 3.7-3.14) infrastructure in relation to proposed development. This includes water demand management planning.</p>
<p><i>Health and social care – Capacity pressures on existing services:</i></p> <ul style="list-style-type: none"> No provision for increase in doctor’s/dental surgeries (Send). <p>Garlick’s Arch will produce too great a strain on already stretched medical services. Garlick’s Arch (A43) has no infrastructure projects in the Infrastructure Schedule to support it.</p> <p>Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.</p> <p>Where will the people go for their health care? It already takes over a week to get a routine appointment at Ash Vale Health Centre. East Horsley medical care inadequate for the amount of housing and buildings envisaged in the village (even with revisions).</p>	<p>Guildford Borough Council have engaged lead agencies, including the relevant Clinical Commissioning Groups, GPs and NHS England as part of its cooperation efforts. These engagements helped inform the compilation of the IDP and Infrastructure Schedule.</p> <p>The IDP provides detail on the infrastructure needed to support the development reflected (see section 6 regarding health and social care facilities). This has informed the detailed preparation of the Infrastructure Schedule at Appendix C of the Local Plan.</p> <p>The IDP is regarded as a live document, which will be reviewed and modified as required throughout the plan period as further information becomes available.</p>

<p>No account taken to assess the current or future clinical needs of the community and no additional capacity (for primary health care) has been built in to the plan for the increase in population or NHS England's changing health strategy. Insofar as the Farncombe area is concerned, the additional site allocation for a Centre of Health should be made.</p>	
<ul style="list-style-type: none"> Concerns regarding capacity of practice at Ash Vale to deal with increase in patients, including suitability / availability of land (for expansion). Also concerns regarding the cost, poor access, very limited parking, and poor accessibility – not on a bus route and far from the proposed new developments. 	<p>It is recognised that additional health care capacity / GP provision is necessary in the area with planned development, as reflected in the Infrastructure Schedule at Appendix C.</p> <p>The form of provision is not fixed, with two options being identified in the Infrastructure Schedule – expansion of existing GP provision in the area to provide additional capacity for residents of the Ash and Tongham strategic location for development or land and a new building for a new GPs practice surgery at the Ash and Tongham strategic location for development.</p>
<p><i>Green Infrastructure: Special Protection Areas and SANG. Open Space – Impact on Thames Basin Heath:</i></p> <ul style="list-style-type: none"> With regard to SANG provision, the Policy wording indicates that the council is more interested in meeting its legal responsibilities than actually protecting wildlife - the Thames Basin Heaths SPA appears to be an obstacle to be overcome rather than a valued asset. <p>Do not consider that the IDP is adequate in relation to the provision of suitable or sufficient SANG.</p> <p>The Infrastructure Schedule sets out 13 SANG allocations including 3 current spaces. It is important for there to be clarity on the remaining 10 spaces in respect of the timing of their delivery, particularly in instances where the SANG in question and the development allocations reliant on them are</p>	<p>Policy P5 gives strong weight to the maintenance of the ecological integrity of the Thames Basin Heaths SPA. The purpose of SANG is provided in the definitions of Policy P.5 (4.3.57). This is in line with Strategic Objective 6 of the Submission Local Plan.</p> <p>Policy P5 reflects principles related to the provision of SANG. Qualifying developments may be required to provide or fund avoidance and mitigation measures. The development management process will contribute to ensuring that SANG provision is delivered in accordance with requirements (e.g. through the use of Grampian conditions). The IDP provides detail regarding potential allocation of development sites to existing and proposed SANG, as well as detailing the funding and delivery of proposed SANG (see 4.43 – 4.60). Where relevant, site allocations in the Submission Local Plan</p>

<p>in different ownership.</p> <p>Already parking at Effingham junction. Building upon Effingham Common and allowing motor vehicles to access the common would contravene a number of Acts. Rare insect and birdlife would be damaged.</p> <p>Support the approach of this policy, save for the priority given to the Thames Basin Heath SPA over all other site specific contributions, as this absence of flexibility is inconsistent with the Council's approach to all other S106 obligations.</p> <p>Draft Policy P5 contemplates situations where the integrity of the SPA may be protected through different thresholds or alternative mitigation measures and the reasoned justification to the policy that the Council's established precautionary principle may be reviewed by its JSPB in the future. Furthermore, the legal requirement, enshrined in European Law, may well change as a consequence of the UK leaving the European Union. We therefore suggest that the fourth paragraph of Policy 11 be deleted.</p>	<p>provide requirements for SANG to be secured as part of development management processes. This is the case in relation to Bespoke SANG as part of the development of strategic sites.</p> <p>GBC is currently considering options for delivering a parking area. However, the SANG allocation scenario provided in the IDP does not rely upon the delivery of a parking area at Effingham Common in order to mitigate proposed development sites. Any infrastructure provided would need to comply with relevant laws.</p> <p>The limitations regarding s106 contributions in relation to SANG funding are recognised. The IDP reflects funding arrangements relating to SANG.</p> <p>Reference should be made to further responses under Policy P5 of the consultation statement.</p>
<ul style="list-style-type: none"> Land allocated under Policy A43a has not been included within the Council's Sustainability Appraisal for the Local Plan. As such the inclusion of this site within the Local Plan is considered to result in the Local Plan being unable to demonstrate that it is sound for the purposes of examination and adoption. Policy A43a should therefore be removed from the Local Plan and Policy I1 and Appendix C revised accordingly. 	<p>Site allocation A43a was included within the Sustainability Appraisal (2016). It remains an allocation and is therefore also included with the Sustainability Appraisal (2017).</p>

ID2: Supporting DfT ‘Road Investment Strategy’

Main Issue	Guildford Borough Council Response
<p>Representations from Prescribed Bodies and Selected Stakeholders</p>	
<p>Highways England</p> <ul style="list-style-type: none"> In its representation on the Draft Local Plan 2016 dated 18 July 2016, Highway England raised concerns regarding the advancement of a spatial strategy which is reliant on the delivery of the three RIS schemes: <ul style="list-style-type: none"> With respect to the schemes at M25 Junctions 10-16 and the M25 Junction 10/A3 Wisley interchange with construction anticipated to commence in Road Period 1 (2015/16 to 2019/20), Highways England stated that ‘at this time there is not a detailed design to demonstrate the level of growth the schemes might facilitate’ (p.2) With respect to the A3 Guildford scheme with construction anticipated to commence in Road Period 2 (2020/21 to 2024/25), Highways England stated that ‘it is not considered “sound” to base the Local Plan on the A3 RIS 2 scheme’ (p.3). <p>Highway England also stated that they ‘recommend that for Policy 12 to be justified, effective and "sound", in accordance with the NPPF, the following wording additions should be applied’ at the end of the draft policy:</p> <ul style="list-style-type: none"> ‘Planning permission will not be granted for sites that adversely impact the safe and efficient operation of the local and strategic road networks or that compromises the delivery of emerging improvements.’ (p.3). 	<p>Following a meeting on 1 September 2016 to explain and clarify the approach taken to this matter in the Draft Local Plan 2016, Highways England, in a letter dated 5 October 2016, withdrew its previous representation of 18 July 2016 with respect to this policy as follows:</p> <p><i>‘We support Guildford’s commitment to work with Highways England to develop improvements to the A3 and M25. It is noted from the Local Plan, the implementation of the three RIS schemes during the plan period is required in order to be able to accommodate planned growth. Highways England is committed to commence construction of two RIS1 schemes during roads period 1, namely M25 Junction 10/A3 Wisley Interchange and M25 Junction 10 – 16. Work is ongoing on a number of options but there is not a detailed design available at this time. ...</i></p> <p><i>You will be aware that Highways England is currently developing options for a potential scheme on the A3 in Guildford, capable of being delivered in the next roads period (2020-2025), subject to the normal value for money being applied.</i></p> <p><i>We note that the delivery of housing in the later stages of the plan period is dependent upon a major improvement to the A3 through Guildford. It is essential that the Local Plan provides the planning policy framework to ensure development does not come forward in advance of critical infrastructure. As a result of clarification received at our recent meeting, it is now understood how the Local Plan intends to do this. <u>Therefore we wish to formally withdraw our representation to this policy.</u>’ (p.1-2).</i></p>

<p>Highways England</p> <ul style="list-style-type: none"> States that ‘Our letter dated 5 October 2016 sets out Highways England comments on Policy ID2 and specifically its position on a potential A3 and planned M25 schemes, which remain the current position. However, you will note that subsequent to a public consultation earlier this year, we plan to announce the preferred route for the M25 Junction 10 scheme in late August. This may or may not have implications for proposals set out in policies A43A (Burnt Common) and A35 (Wisley Airfield) can be delivered.’ 	<p>Noted that Highways England’s comments on Policy ID2 and its position on a potential A3 and planned M25 schemes remain unchanged.</p> <p>Highways England’s Preferred Route Announcement for the M25 Junction 10/A3 Wisley interchange scheme has subsequently been delayed and is now not expected to commence until January 2018.</p>
<p>Representations on Specific Issues</p>	
<p><i>Uncertainty over funding decision for RIS schemes:</i></p> <ul style="list-style-type: none"> Decision whether or not to fund Road Investment Strategy (RIS) schemes is uncertain or it is unlikely that there will be a positive funding decision. There is a history of road investment plans being delayed, including beyond plan periods, or cancelled. <p>Result of EU referendum has not been taken into account and this produces uncertainties regarding the budget and priorities of Highways England.</p> <p>Highways England has no plans/has confirmed it has no plans to examine/even start considering improving the A3 before 2020.</p>	<p>Highways England is also progressing the development of a major scheme for the improvement of the A3 in Guildford from the A320 to the A31 Hog’s Back junction, as required by the Road Investment Strategy: for the 2015/16 – 2019/20 Road Period (Department for Transport, March 2015) (hereafter the RIS). The RIS identifies the A3 Guildford scheme as a scheme which will be developed during this Road Period (p.30) – in the period to 2020 – to enter construction in the next Road Period (p.46). This scheme is referenced as SRN2 in the Submission Local Plan’s Infrastructure Schedule.</p> <p>Highways England is actively developing the A3 Guildford scheme, and, in 2017, progressed the scheme from stage 0 ‘Strategy, shaping and prioritisation’ to stage 1 ‘Option identification’ of its project control framework.</p> <p>Applying a cautious approach Highways England has advised that, if a scheme is approved, with funding agreed, construction is unlikely to be start until 2024 at the earliest, with construction taking 2½ years.</p> <p>In the early years of the new Local Plan, the delivery of planned development and the impact of new development traffic on the Strategic Road Network (SRN) is likely to be an important ongoing</p>

consideration as the existing SRN suffers from significant congestion during peak periods. Highways England's main concern is road safety and any proposal that adds significant levels of traffic to existing congested areas will need to be carefully assessed through the development management process for planning applications to ensure that it does not have a severe impact on road safety.

With this in mind, the delivery of planned development has been proposed to ensure that the sites, and phasing of sites, that will be delivered in the first years of the new Local Plan, and therefore in the absence of the Department for Transport's RIS Road Period 1 and/or Road Period 2 schemes are located where traffic associated with them will have the least impact on the SRN's links and junctions where current congestion issues are the most acute.

In addition, Highways England has developed several targeted improvement schemes for the Guildford section of the A3, primarily to improve road safety but also providing some congestion relief. In March 2017, the Government committed funding for two of these schemes, which are included in the Proposed Submission Local Plan's Infrastructure Schedule as:

- SRN7 'A3 northbound off-slip lane widening at University Interchange (approaching Tesco roundabout) improvement scheme'
- SRN8 'A3 southbound off-slip lane widening to A320 Stoke Interchange improvement scheme'.

The two schemes will be delivered by spring 2020.

<p><i>Funding certainty of A3 small-scale improvements:</i></p> <ul style="list-style-type: none"> • There is no certainty about A3 small improvements due to risk associated with future decisions on funding. 	<p>Highways England has developed several targeted improvement schemes for the Guildford section of the A3, primarily to improve road safety but also providing some congestion relief. In March 2017, the Government committed funding for two of these schemes, which are included in the Proposed Submission Local Plan's Infrastructure Schedule as:</p> <ul style="list-style-type: none"> - SRN7 'A3 northbound off-slip lane widening at University Interchange (approaching Tesco roundabout) improvement scheme' - SRN8 'A3 southbound off-slip lane widening to A320 Stoke Interchange improvement scheme'. <p>The two schemes will be delivered by spring 2020.</p>
<p><i>Construction phase impacts should be a constraint on development:</i></p> <ul style="list-style-type: none"> • There will be massive adverse traffic impacts during construction phases of RIS schemes which should be a constraint to planned development during this plan period. 	<p>For a major highway scheme, the traffic impacts during its construction phases will be managed through a Construction Management Plan.</p> <p>Policies in the Submission Local Plan manage the risks arising from the uncertainties regarding the delivery and timing of delivery of the key infrastructure on which the delivery of the Plan depends, including the three RIS schemes. In this regard, see Policies ID1, ID3 (point (8)) and the site Policies A24 (requirement (2)), A25 (requirement (9)), A26 (requirement (9))and A35 (requirement (5)). This could include consideration of traffic impacts during the construction phases of the RIS schemes.</p> <p>The development management process for major planning applications will also involve the consideration of the traffic impacts of the construction phases of the RIS schemes – see Policy ID3 point (7).</p>

Policy should differentiate between sites where A3 and M25 improvements are necessary prior to development of site and sites where there is no significant impact on A3 and M25:

- Reference to 'other large sites' in draft policy I2 should be clarified as, for example, North Street site is considered not to have a significant impact on the A3 and M25.

Changes were made to the policy in the Draft Local Plan 2017 to refer to sites 'close', rather than 'adjacent', to the M3 and M25, and 'strategic', rather than 'large' sites'. In addition, a change to paragraph 4.1.9 in the Draft Local Plan 2017 identifies the North Street redevelopment as a strategic development site.

Significant, recurrent traffic congestion is experienced during peak hours on the A3 trunk road as it runs through the town of Guildford, and also in Guildford town centre, especially on the gyratory system and its approaches. Congestion on the Strategic Road Network frequently spreads to the Local Road Network and vice-versa.

Accordingly, it is considered to be appropriate that Policy ID2 applies to the promoter of the North Street redevelopment site.

ID3: Sustainable transport for new development

Main Issue	Guildford Borough Council Response
<p><i>Representations from Prescribed Bodies and Selected Stakeholders</i></p>	
<p>Surrey County Council <i>Retain Policy M8 safeguard Guildford to Cranleigh Movement Corridor:</i></p> <ul style="list-style-type: none"> • Policy M8 (The Guildford to Cranleigh Movement Corridor) of the existing 2003 Local Plan safeguards the route of the former Cranleigh railway line. While there is little likelihood of this corridor being required for a major alternative piece of infrastructure, such as a light railway, it is nonetheless a vital facility for cyclists and walkers and will continue to serve that function. Its general quality will need to be maintained and improved where possible, so for this reason it should continue to be safeguarded as a corridor. 	<p>Site allocation policies allocate land for development during a plan period. As the representation makes clear, no development is planned during the plan period.</p> <p>Footpaths and bridleways in Surrey County Council's Rights of Way network are coincident with most of the section of the Guildford to Cranleigh Movement Corridor within Guildford borough, as defined by the existing 2003 Local Plan.</p> <p>Guildford Borough Council considers that Surrey County Council's ambition to maintain and improve the Guildford to Cranleigh Movement Corridor within Guildford borough would be best achieved by:</p> <ul style="list-style-type: none"> - Surrey County Council' use of its power as Local Highway Authority to make an order creating a Right of Way over the A281 Horsham Road to Tannery Lane section of the former railway line which is not presently designated, or alternatively to enter into an agreement with the landowner to create a Right of Way. - The maintenance and improvement of the relevant Rights of Way by Surrey County Council.

Elmbridge Borough Council

Delivery of the RIS schemes:

- Concerned about the impact of growth on the Strategic Road Network, particularly with regard to the new settlement at the Former Wisley Airfield as well as other proposed development sites along and close to the A3, should the appropriate mitigation measures not be implemented. The Government's Road Investment Strategy schemes are complicated and may involve land acquisition. Given these complications, it is considered that Guildford Borough Council could provide a better estimate in terms of delivery knowing that the development of some sites is unlikely to be in the first few years of the plan.

The Transport topic paper (2017) describes the relationship between the phasing of developments – reproducing the Housing Trajectory from the LAA – and transport schemes, and includes a figure showing this.

The delivery of planned development has been proposed to ensure that the sites, and phasing of sites, that will be delivered in the first years of the new Local Plan, and therefore in the absence of the Department for Transport's RIS Road Period 1 and/or Road Period 2 schemes are located where traffic associated with them will have the least impact on the SRN's links and junctions where current congestion issues are the most acute.

Accordingly, Policy S2 proposes a phased target for housing delivery, which begins at a relatively low level in the early years and increases thereafter in line with the expected delivery of infrastructure and strategic sites.

The delivery timescales for Road Investment Strategy schemes are based on the best knowledge of the Council following on-going liaison with Highways England.

<p>Hampshire County Council <i>Cross boundary assessment of transport impacts to be included in policy.</i></p> <ul style="list-style-type: none"> With respect to the requirement in Policy I3 for new developments 'to demonstrate adequate provision to mitigate the likely impacts, including cumulative impacts, of the proposal on both the safe operation and the performance of the Local Road Network and Strategic Road Network', Hampshire County Council, as a neighbouring Local Highway Authority, would like the policy amended to require the wider area to be addressed, including cross-borough boundary areas such as Hampshire's road network. 	<p>The Policy, as drafted in the Draft Local Plan 2016, stated with respect to the 'provision' that this will 'address impacts in the wider area including across the borough boundary'. Guildford borough borders Rushmoor borough, for which Hampshire County Council is the Local Highway Authority. This wording has been retained.</p> <p>In addition, Policy ID3 was amended in the Draft Local Plan 2017 to require, with respect to the provision of mitigation, that 'This mitigation (a) will maintain the safe operation and the performance of the Local Road Networks and the Strategic Road Network to the satisfaction of the relevant highway authorities' – see paragraph (7)(a). Specifically, the term 'Local Road Network' is used in the plural form and the text 'to the satisfaction of the relevant highway authorities' is an addition.</p>
<p>Hampshire County Council <i>Cross boundary consultation of applications to be included in policy:</i></p> <ul style="list-style-type: none"> Hampshire County Council would expect to be consulted on any future planning applications as and when it is lodged in relation to the developments in Ash and Tongham, in order to identify the potential impact on Hampshire's road network. In addition, it is requested that Hampshire County Council be involved in any discussions aimed at addressing the impacts of any such development. 	<p>Since January 2017, Guildford Borough Council has notified Hampshire County Council of any planning application for 10 units or more in Ash and Tongham.</p> <p>Policy ID3 was amended in the Draft Local Plan 2017 to require, with respect to the provision of mitigation, that 'This mitigation (a) will maintain the safe operation and the performance of the Local Road Networks and the Strategic Road Network to the satisfaction of the relevant highway authorities' – see paragraph (7)(a). Specifically, the term 'Local Road Network' is used in the plural form and the text 'to the satisfaction of the relevant highway authorities' is an addition.</p>

<p>Rushmoor Borough Council <i>Request certainty of delivery of infrastructure improvements:</i></p> <ul style="list-style-type: none"> Rushmoor Borough Council is supportive of the planning policy framework and detailed infrastructure projects as they relate to the road network, subject to certainty regarding the delivery of these improvements as part of the overall package of implementation of development in and around Ash, Ash Vale and Tongham. 	<p>The Policy requirements have been strengthened with respect to the delivery of the key infrastructure requirements on which the delivery of the Plan depends in the Draft Local Plan 2017:</p> <ul style="list-style-type: none"> Policy ID1 Infrastructure and delivery was amended to require that 'If the timely provision of infrastructure necessary to support new development cannot be secured, planning permission will be refused' – see paragraph (3). Policy ID3 Sustainable transport for new developments was amended to require that 'Planning applications for new development will have regard to the Infrastructure Schedule at Appendix C which sets out the key infrastructure requirements on which the delivery of the Plan depends, or any updates in the latest Guildford borough Infrastructure Delivery Plan' – paragraph (8).
<p>Representations on Specific Issues</p>	
<p><i>Air quality and noise impacts related to transport will be significant:</i></p> <ul style="list-style-type: none"> Increased levels of nitrogen dioxide (NO₂) and particulates due to the increased traffic volumes resulting from the significant planned development are likely to result in national air quality objectives for pollutants being breached and there being liability for fines. <p>Air pollution will affect the health of children and the elderly.</p> <p>Air pollution on the B3000 The Street in Compton is significant, with one property exceeding the national air quality objective for annual mean nitrogen dioxide concentration.</p> <p>Roads in Ripley, Send, Clandon, Ockham, the Horsleys, north east of borough, Compton including The Street and</p>	<p>AECOM undertook an Air Quality Review of Guildford Borough Proposed Submission Local Plan: Strategy and Sites "June 2017" (June 2017). This was a qualitative-risk based review, which considered the risk of significant air quality effects (in terms of annual mean concentrations of NO₂, PM10 and PM2.5) occurring with the implementation of the Draft Local Plan 2017. Consideration of risk was based on the size and nature of anticipated developments, their location, ambient air quality around potential developments and the locations of sensitive receptors to air quality around potential developments (including residential properties, schools and hospitals).</p> <p>The findings suggest that the effect of the Draft Local Plan on annual mean NO₂ concentrations will be negligible and not a key constraint on development in the majority of the borough. Further, detailed modelling was recommended as being advisable around roads</p>

Down Lane, Burpham, Merrow, and on strategic sites, will all be affected by adverse air quality and noise impacts.

This will also affect the M25 Junction 10/A3 Wisley interchange junction where nitrogen dioxide levels are in excess of in national air quality objectives (EU limit values), adversely affecting the health of current and potential future residents, including a potential new school at the former Wisley airfield site, causing increased acid deposition on the Thames Basin Heaths SPA and causing irreversible habitat degradation.

where notable changes in traffic flows are predicted, at locations in close proximity to sensitive receptors; albeit in each case it was considered unlikely that these development-related increases would lead to an exceedance of the air quality objective.

For particulate matter – both PM10 and PM2.5 – negligible effects are anticipated at all sensitive receptors for air quality.

It was also recommended that the findings of the Air Quality Review be confirmed as part of the planning application processes for specific sites. Accordingly potential air quality issues have been added as a 'key consideration' for policies A24 Slyfield Area Regeneration Project, A25 Gosden Hill Farm, A26 Blackwell Farm and A29 Land to the south and east of Ash and Tongham.

The potential effect on European designated ecological sites such as the SPA is considered in detail in the Habitat Regulations Assessment (2017). This finds that the Local Plan will not result in likely significant effects upon the SPA as a result in changes in air quality, notwithstanding the likely elevation in NOx concentrations along some road links (HRA, paragraph 10.4.14).

The Council also manages local air quality through the Local Air Quality Management regime. At present, there are no Air Quality Management Areas (AQMAs) in the borough, although an AQMA covering a small area in the village of Compton may be designated shortly, subject to the outcome of a consultation with affected residents. If an AQMA is designated, the Council will put together a Local Air Quality Action Plan to improve the air quality in this area.

<p><i>Acid deposition not taken into account:</i></p> <ul style="list-style-type: none"> No account has been taken of acid deposition on Thames Basin Heaths SPA and the irreversible impact of habitat degradation/biodiversity reduction. 	<p>The potential effect on European designated ecological sites such as the SPA is considered in detail in the Habitat Regulations Assessment (2017). This finds that the Local Plan will not result in likely significant effects upon the SPA as a result in changes in air quality, notwithstanding the likely elevation in NOx concentrations along some road links (HRA, paragraph 10.4.14).</p>
<p><i>Suggest replace 'direct improvements' with 'Section 278 agreements':</i></p> <ul style="list-style-type: none"> Suggest replace 'direct improvements' with 'Section 278 agreements'. 	<p>This text is included in point (9) of Policy ID3 in the Submission Local Plan.</p> <p>The term 'direct improvements' is considered to encompass schemes delivered through Section 278 agreements, as well as including schemes for infrastructure and services located and/or operated on land in private ownership, and also highway schemes that are covered by Section 38 agreements.</p>
<p><i>Wording of Policy I3 (now ID3) should be stronger:</i></p> <ul style="list-style-type: none"> The use of the wording 'we will expect' in the policy is vague, weak and ineffective; proposed that the policy requirements should be definite. <p>Wording in the Reasoned Justification that 'developers should have regard to the Infrastructure Schedule at Appendix C' (paragraph 4.6.28) is not strong enough. Including propose that should be replaced by 'we will require...'</p> <p>Bullet points 7, 8, 9 and 10 – on the matters of on-street vehicular parking, ultra low emission vehicles, the needs of people with disabilities, and the Sustainable Movement Corridor respectively – are vague, weak and aspirational with</p>	<p>Changes made to the policy in the Draft Local Plan 2017:</p> <ul style="list-style-type: none"> - Policy tightened with replacement of four instances of 'we will expect', in three cases with 'will be required'. - Infrastructure Schedule referenced in Policy itself (see point (8)), as follows: 'Planning applications for new development will have regard to the Infrastructure Schedule at Appendix C which sets out the key infrastructure requirements on which the delivery of the Plan depends, or any updates in the latest Guildford borough Infrastructure Delivery Plan.' - Requirement for planning obligation preventing future occupants obtaining on-street residents parking permits now specified as applying to CPZs, or component areas thereof, in which the demand for on-street parking by residents of existing dwellings and, where allowed, 'pay and display' visitor parking exceeds

ambiguous phrasing such as 'facilitate the use of', 'wherever possible', 'contribute to' and 'where appropriate'.

the supply of designated on-street parking spaces (Policy ID3, point (4)).

- Requirement tightened for residential new development in other areas of the borough, and for all non-residential new development, such that any development-related parking on the public highway does not adversely impact road safety or the movement of other road users spaces (Policy ID3, point (4)).
- Point (1) of Policy ID3, which refers to 'sustainable transport modes', has been amended to specify the sustainable transport modes of walking, cycling and the use of public and community transport, and the NPPF definition of 'sustainable transport modes', which includes 'ultra-low emission vehicles', has been added to a (new) Definitions section.
- The Policy wording specific to ultra-low emission vehicles, namely to 'facilitate the use of ultra-low emission vehicles' has been removed from the policy, as it considered that this is superseded by changes to Policy point (1).
- The policy wording regarding provision for people with disabilities has been rephrased and is now introduced by 'New development will be required, in so far as its site's size, characteristics and location allow, to maximise: ...', rather than 'We will expect new development to: ...' – (see Policy ID3, point (2)).
- Policy on Sustainable Movement Corridor separated into a new paragraph (numbered 3) with targeted application to relevant new developments ('New development providing, contributing and/or close to the routes of the proposed Sustainable Movement Corridor in the Guildford urban area...') with respect to a future Sustainable Movement Corridor Supplementary Planning Document.

<p><i>Policy regarding on-street vehicular parking is not evidenced:</i></p> <ul style="list-style-type: none"> • It is unreasonable that the Vehicle Parking Supplementary Planning Document, which is referenced in bullet point 6 as the source document for the identification of areas of on-street parking stress, has not been issued and is not listed as a document in the Key Evidence. 	<p>Changes made to the policy in the Draft Local Plan 2017:</p> <ul style="list-style-type: none"> - Reference to Vehicular Parking Supplementary Planning Document has removed. - The policy requirement for planning obligation preventing future occupants obtaining on-street residents parking permits now specified as applying to CPZs, or component areas thereof, in which the demand for on-street parking by residents of existing dwellings and, where allowed, 'pay and display' visitor parking exceeds the supply of designated on-street parking spaces (Policy ID3, point (4)). A proposed amendment to the Submission Local Plan is to list the present version of the parking strategy for Guildford borough in the Key Evidence. - Addition of paragraphs 4.6.24a-e provides clarity on vehicular parking policy in the Reasoned Justification.
<p><i>Unacceptable adverse impacts of traffic growth, including severe transport impact, and social and environmental impacts:</i></p> <ul style="list-style-type: none"> • The planned developments in the Draft Local Plan will result in significantly increased traffic volumes on local and strategic roads, with consequent adverse impacts on their safe operation and performance, on communities and on the environment including impacts on amenity and health, noise pollution and air pollution, with acute problems on the A3 trunk road, the M25 motorway, in the urban areas of Guildford, Ash and Tongham, and in the villages. <p>In addition:</p> <ul style="list-style-type: none"> • The local and strategic road networks lack resilience and are vulnerable to disruption. • The problems caused by lorries and vans using local and minor roads, including roads and lanes in the country and in villages, for which they are unsuitable, will be worsened. • The problems of high traffic volumes on unsuitable village 	<p>The Guildford Borough Proposed Submission Local Plan "June 2016": Strategic Highway Assessment Report (Surrey CC, June 2016) (hereafter the SHAR 2016) represents a robust "worst case" in terms of transport demand and supply assumptions, as it does not assess and therefore does not account for the mitigation; including the potential for modal shift, and the new and improved sustainable transport choices provided by the rail, bus and active modes schemes included in the Draft Local Plan 2016 and makes no allowance for any internalisation of trips within the larger sites.</p> <p>The total mileage and the total number of vehicle hours travelled on the borough's highway networks is forecast to increase, with or without a Submission Local Plan. For instance, based on the SHAR 2016 models, even with no future development in Guildford borough, total mileage will increase by 12 per cent between 2009 and 2031 in the average morning peak hour, driven by development elsewhere and changes in demographic profile and car ownership.</p>

roads and of parking in villages will be worsened.

As a consequence of the above, residual cumulative impacts of planned developments in the Draft Local Plan will be severe, failing the policy test set by paragraph 32 in the NPPF.

In 2031, with the Draft Local Plan 2016, there is a 2 per cent increase in the average morning peak hour and a 2 per cent decrease in the average evening peak hour in the average speed of vehicles on the borough's highway network, compared to a theoretical future in which there is no development and are no new highway schemes in Guildford borough.

The SHAR 2016 concludes that "The results show that for Scenario 5, which represents the quantum and distribution of development proposed in the Proposed Submission Local Plan together with the key highway schemes, there will not be a severe impact on the local and strategic highway network" (p.62). The addendum to the SHAR 2016 (Guildford BC, June 2017) found that this conclusion was "not considered likely to change" as a result of the key changes made to proposed site policies and to the programme of transport schemes in the Draft Local Plan 2017.

The likely effects of the emerging plan, and alternatives, on environmental, social and economic issues/objectives, have been considered, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have, through the Sustainability Appraisal process (AECOM).

The Plan-level impacts on air quality and habitats have also been considered in detail, most particularly as evidenced in:

- Air Quality Review of Guildford Borough Proposed Submission Local Plan: Strategy and Sites "June 2017" (AECOM, 2017).
- Habitats Regulations Assessment for Guildford Borough Proposed Submission Local Plan: Strategy and Sites 2017 Update (AECOM, 2017).

New developments that will generate significant amounts of movement will, at the planning application stage, be supported by a

	<p>Transport Statement or Transport Assessment, and subject to the policy tests in NPPF paragraph 32 and Policy ID3. Individual new developments may be required to provide mitigation measures additional to those in the Infrastructure Schedule.</p> <p>The Infrastructure Schedule sets out a significant programme of transport schemes to mitigate the principal transport impacts of planned development in the Submission Local Plan.</p> <p>The residual cumulative transport impacts of planned development in the Draft Local Plan are not considered to be severe, and so will not fail the policy test set by paragraph 32 in the NPPF.</p>
<p><i>Lack of improvement of A3 by 2020 should restrict planned development:</i></p> <ul style="list-style-type: none"> Highways England has no plans to look at improving the A3 before 2020. It is therefore not sustainable to identify sites for further development, which will worsen congestion on the strategic road network. 	<p>Highways England has developed several targeted improvement schemes for the Guildford section of the A3, primarily to improve road safety but also providing some congestion relief. In March 2017, the Government committed funding for two of these schemes, which are included in the Proposed Submission Local Plan's Infrastructure Schedule as:</p> <ul style="list-style-type: none"> - SRN7 'A3 northbound off-slip lane widening at University Interchange (approaching Tesco roundabout) improvement scheme' - SRN8 'A3 southbound off-slip lane widening to A320 Stoke Interchange improvement scheme'. <p>The two schemes will be delivered by spring 2020.</p> <p>Highways England is also progressing the development of a major scheme for the improvement of the A3 in Guildford from the A320 to the A31 Hog's Back junction, as required by the Road Investment Strategy: for the 2015/16 – 2019/20 Road Period (Department for Transport, March 2015) (hereafter the RIS). The RIS identifies the A3 Guildford scheme as a scheme which will be developed during</p>

this Road Period (p.30) – in the period to 2020 – to enter construction in the next Road Period (p.46). This scheme is referenced as SRN2 in the Submission Local Plan’s Infrastructure Schedule.

Highways England is actively developing the A3 Guildford scheme, and, in 2017, progressed the scheme from stage 0 ‘Strategy, shaping and prioritisation’ to stage 1 ‘Option identification’ of its project control framework.

Applying a cautious approach Highways England has advised that, if a scheme is approved with funding agreed, construction is unlikely to be start until 2024 at the earliest, with construction taking 2½ years.

In the early years of the new Local Plan, the delivery of planned development and the impact of new development traffic on the Strategic Road Network (SRN) is likely to be an important ongoing consideration as the existing SRN suffers from significant congestion during peak periods. Highways England’s main concern is road safety and any proposal that adds significant levels of traffic to existing congested areas will need to be carefully assessed through the development management process for planning applications to ensure that it does not have a severe impact on road safety.

With this in mind, the delivery of planned development has been proposed to ensure that the sites, and phasing of sites, that will be delivered in the first years of the new Local Plan, and therefore in the absence of the Department for Transport’s RIS Road Period 1 and/or Road Period 2 schemes are located where traffic associated with them will have the least impact on the SRN’s links and junctions where current congestion issues are the most acute.

Policy ID1 requires, at point (3), that ‘If the timely provision of infrastructure necessary to support new development cannot be secured, planning permission will be refused’. When determining

	<p>planning applications, and attaching appropriate planning conditions and/or planning obligations, regard will be had to the delivery and timing of delivery of the key infrastructure, or otherwise alternative interventions which provide comparable mitigation’.</p>
<p><i>Unrealistic expectation for modal shift:</i></p> <ul style="list-style-type: none"> • The plan depends on unrealistic “modal shift” from private car use to walking, cycling and public transport. <p>Bus services even in the largest villages are almost non-existent.</p> <p>The Council is not proposing to subsidise new bus services.</p> <p>Lack of footpaths on local roads and streetlights in villages, including in West Horsley, East Horsley, Ockham, Wisley village and West Clandon.</p> <p>Policy is not realistic for rural areas.</p> <p>Policy is not applicable to out-of-town greenfield sites.</p> <p>Commuters and shoppers will drive to Guildford town centre in preference to using Park and Ride services, as former is easier and less expensive.</p> <p>The majority of residents are not able to cycle including children, the elderly, commuters, the infirm, the unfit and people carrying goods or shopping.</p> <p>Cycling infrastructure is not in place – poor quality cycle lanes, poor road surfaces, danger from HGVs.</p> <p>Increased conflict between cyclists and pedestrians, including vulnerable pedestrians.</p>	<p>The Council considers that the significant programme of schemes to provide and improve opportunities to use active modes, bus and rail has is realistic. The Council has worked closely with transport providers to identify these schemes and, where appropriate, is able to demonstrate progress in progressing their feasibility, design and delivery. Section 4 of the Duty to Cooperate topic paper (2017), and section 5 of the Transport topic paper (2017) provide further information on our working arrangements and the origin and status of schemes.</p> <p>The NPPF states that ‘The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel’ (paragraph 29). The Draft Local Plan seeks to achieve a modest modal shift over the period to 2034, within the context of an absolute increase in traffic volumes, that latter accommodated by schemes to increase highway capacity and improve road safety. This is set out in the new text in paragraph 4.6.28 of the Draft Local Plan 2017.</p> <p>The Guildford Borough Proposed Submission Local Plan “June 2016”: Strategic Highway Assessment Report (Surrey CC, June 2016) represents a robust “worst case” in terms of transport demand and supply assumptions, as it does not assess and therefore does not account for the mitigation, including the potential for modal shift, of the new and improved sustainable transport choices provided by the rail, bus and active modes schemes included in the Draft Local Plan and makes no allowance for any internalisation of trips within the larger sites.</p>

	<p>Site selection involved the assessment of transport opportunities and constraints for potential sites including vehicular, pedestrian and cyclist access/egress.</p> <p>There will be greater reliance on the use of private cars in new developments in the villages. The NPPF states that ‘different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas’ (paragraph 29). We have reproduced this text in paragraph 4.6.20 of the Draft Local Plan 2017.</p> <p>Schemes BT3, BT5 and BT6 would require the developers of the former Wisley airfield, Gosden Hill Farm and Blackwell Farm sites respectively to provide significant bus networks serving their sites and key destinations. The Draft Local Plan does not propose the subsidy of new bus services by the Council or Surrey County Council.</p> <p>The Draft Local Plan, as modified by the changes subject to consultation in 2017, requires that the developer of the Gosden Hill Farm site provide land and park and ride facility of a sufficient scale as required by projected demand and in order to operate without public subsidy in perpetuity. We consider that a park and ride facility, as part of a package of measures, will provide mitigation for the otherwise adverse material impacts resulting from the development of the Gosden Hill Farm site.</p> <p>There is an opportunity for increased levels of cycling during the plan period and schemes are included to realise this opportunity. The inadequacy of the existing network of cycle routes is recognised in the next text in paragraph 2.13 in the Draft Local Plan 2017. The design process for highway schemes, including for cycle schemes, considers the potential for conflict between road users and seeks to reduce this.</p>
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Further increase in traffic volumes on A247 for which it is unsuitable:

- The A247 is unsuited to coping with additional traffic and the changes made to proposed site policies in the Draft Local Plan 2017 will significantly further increase the amount of traffic on this road when compared to forecast traffic resulting from planned development in the Draft Local Plan 2016.

In the Draft Local Plan 2017, it was proposed to remove the allocation of 7,000 sq m of industrial land (comprising either or a mix of B1c, B2 and B8) to the Garlick's Arch site (Policy A43). Instead, the 7,000 sq m of industrial land was proposed to be allocated to the land around the Burnt Common warehouse (Policy A58).

Both the Policy A43 and Policy A58 sites are in the same model zone as represented in transport models used for the Guildford Borough Proposed Submission Local Plan "June 2016": Strategic Highway Assessment Report (Surrey CC, June 2016) (hereafter the SHAR 2016)

Accordingly, the SHAR 2016 assessment for this zone remains valid.

The above was described in the addendum to the SHAR 2016 (Guildford BC, June 2017). The addendum also identifies that there is an overall reduction in the quantum of development proposed in the Draft Local Plan 2017, when compared to the Draft Local Plan 2016.

The A247 is an A-road. The DfT has defined A-roads as 'major roads intended to provide large-scale transport links within or between areas' (DfT, January 2012: p.6). Surrey County Council, as the Local Highway Authority, is responsible for maintenance and improvement, of adopted local roads, which collectively comprise the Local Road Network, including the A247.

<p><i>Change policy (4) (a) to apply in all established residential areas:</i></p> <ul style="list-style-type: none"> • Policy in paragraph (4) (a), as proposed in the Draft Local Plan 2017 Plan, should be changed to apply in all established residential areas, irrespective of the relationship between parking capacity and parking demand. 	<p>The Council considers that the policy tests set out in point (4), both (a) and (b), are reasonable.</p> <p>In the case of Controlled Parking Zones, or component areas thereof, in which the demand for on-street resident and 'pay and display' visitor parking does not exceed the supply of designated on-street parking spaces, we do not consider that it would be reasonable for the policy test to be applied.</p> <p>In other areas of the borough not covered by the existing or future Controlled Parking Zones, the parking of a vehicle on-street does not require a residents parking permit, and so the Policy in point (4) could not be applied in any case.</p>
<p><i>Additional public off-street car parking in Guildford town centre requires careful siting and design:</i></p> <ul style="list-style-type: none"> • Policy in paragraph (11), as presented as an addition in the Draft Local Plan 2017, requires a qualification that the support for any additional public off-street car parking, if indicated by the policy test, would be subject to an assessment of the quality of its proposed design and character. <p>Policy in paragraph (11), as presented as an addition in the Draft Local Plan 2017, requires clarification as to whether the policy applies to the expansion of existing public off-street car parking and/or conversion from another use to public off-street car parking.</p>	<p>Policy D4 Character and design of new development would be relevant with respect to the consideration of issues of design and character.</p> <p>Other policies would be relevant to development proposals involving change of use, including Policy E7 Guildford Town Centre.</p>

ID4: Green and blue infrastructure

Main Issue	Guildford Borough Council Response
<p><i>Representations from Prescribed Bodies and Selected Stakeholders</i></p>	
<p>Environment Agency</p> <ul style="list-style-type: none"> • Welcome the reference to the Water Framework Directive in paragraph 4.6.40. However, we recommend that the following wording is used for the first sentence in this paragraph: “The Water Framework Directive (WFD) requires all member states to achieve good ecological and good chemical status for all groundwater and surface water waterbodies by 2027 at the latest.” 	<p>This amendment has been added to the minor modifications table.</p>
<ul style="list-style-type: none"> • This Policy should identify potential opportunities for aligning with Water Framework Directive (WFD) objectives and consider the pressures and aims outlined in the River Basin Management Plan (RBMP). For instance, many of the actions that have been highlighted to bring the River Wey into good ecological status involve re-naturalising the bank by removing hard engineering, encouraging natural buffer zones to the watercourse, removing barriers to fish and eel passage, reducing diffuse pollution and tackling non-native invasive species. Some WFD objectives can only be delivered via catchment wide/cross-boundary planning which the Wey Landscape Partnership (currently hosted by the Surrey Wildlife Trust) was set up to achieve - please see comment above on working in partnership and the Wey Habitat Restoration Strategy. 	<p>Detailed policies that identify specific projects and measures would more appropriately be dealt with in the Local Plan Development Management policies. ID4 is a strategic policy that deals with the overall treatment of the borough’s waterways.</p>

<ul style="list-style-type: none"> In policy point (7) we recommend that the second sentence is replaced with: <ul style="list-style-type: none"> <i>“Development proposals that are likely to have an adverse impact on the functions and setting of any watercourse and its associated corridor will not be permitted. Development should seek to conserve and enhance the ecological, landscape and recreational value of the watercourse and its associated corridor through good design and seeking out opportunities to deliver WFD objectives.”</i> 	<p>The Council does not agree with this recommendation. The proposed wording does not change the policy significantly and it is considered that the current wording is adequate and achieves the same outcome.</p>
<ul style="list-style-type: none"> All rivers (navigable or not) should be protected and enhanced by an 8m wide minimum undeveloped buffer zone (measured from bank top) on both sides of the river. Bank top is defined as the point at which the bank meets the level of the surrounding land. 8m is the minimum required for main rivers under the Thames Region land drainage byelaws. However, on a greenfield site where there is plenty of land available, we would expect to see a wider buffer zone of a minimum of 10m on both sides of the watercourse that varies in size and shape to include larger areas. It may be appropriate to look at a much larger buffer on certain sites but this should be assessed on a site by site basis. The provision of a buffer zone should also be supported by a long term ecological management plan. 	<p>This change has been added to the minor modifications.</p>
<p>Sport England</p> <ul style="list-style-type: none"> The Policy needs to make specific reference to protection of outdoor and indoor sport provision 	<p>The Policy protects open space in line with the NPPF, which includes land used for sports and recreation. This land is identified in the Open Space, Sports and Recreation Assessment, and a reference to this assessment has been added to the policy. Policy E6 protects buildings used for indoor sport.</p>

<ul style="list-style-type: none"> The Council should do additional work to plan for new sports facilities in line with the guidance in Paragraph 73 of the NPPF... <p>There is no robust assessment of need in place in the form of an up-to-date PPS which clearly identifies shortfalls in provision.</p>	<p>The plan is supported by an up to date Open Space Sports and Recreation Assessment which identifies the need for a range of types of open space, including parks and recreation grounds.</p> <p>Strategic policy ID4 protects these spaces. Future development management policies will introduce local standards for new provision of open space and sports facilities. Contributions will be sought from developers to meet needs for these kinds of facilities.</p> <p>Policy E6 protects indoor sports venues. Such venues are typically delivered on a strategic basis to a wider catchment (for example the ice rink at the Spectrum attracts people from a wide area outside the borough boundary). It is appropriate to examine these on a case-by-case basis.</p>
<p>Surrey County Council</p> <ul style="list-style-type: none"> Whilst NPPF paragraph 74 states that existing playing fields should not be built on, paragraph 72, requires local planning authorities to give great weight to the need to expand schools. We accept the need to protect school playing fields, however, this should be more clearly balanced against the need for education facilities . Policy R5 in the 2003 Guildford Local Plan included an exception for school playing fields “where the proposed new development meets a legitimate educational need that is appropriately met on the site.” We would like to see a similar exception included in Policy I4 Green and Blue Infrastructure. 	<p>A new paragraph has been added to the supporting text of policy ID4 in the 2017 version of the plan: “4.6.49a National planning policy requires great weight to be given to the need to create, expand or alter schools to meet the needs of existing and proposed communities. This will be taken into consideration if development is proposed on open space and the development meets a legitimate educational need that is appropriately met on the site.”</p>
<ul style="list-style-type: none"> Objection to the introduction of 4.6.49a which appears to weaken protection for school playing fields. This is inconsistent with Sport England's planning objectives and para 74 of the NPPF which seek to protect existing sports facilities and playing field land against loss from development. 	<p>This paragraph was added to bring the policy into line with the NPPF at the request of Surrey County Council. The paragraph sets out NPPF policy and is not intended to weaken protection for school playing fields, but to clarify the protection that exists.</p> <p>The policy protection has not been weakened.</p>

<p>It is already covered by national policy so an application can be considered with reference to this. Planners are well placed to balance and weigh different policy objectives when considering any application where the public interest requires a trade-off.</p>	
<p>Guildford Allotments Society</p> <ul style="list-style-type: none"> The plan proposes building 13,860 homes but does not propose new allotments and does not consider local need. GBC has a responsibility under S23 of the Small Holdings and Allotments Act 1908 to provide sufficient allotment plots if there is a demand. 140 additional allotment plots, 4.4 ha in total across a number of sites, are required, in the right locations close to where the tenants live. Current allotment provision within the Borough is roughly 1 plot for every 100 homes. With 13,860 additional homes, it seems reasonable to suggest that an additional 140 plots should be made available. <p>However, these factors indicate a higher need:</p> <ul style="list-style-type: none"> Currently there are 137 on the waiting list, although the waiting list tends to fluctuate between 50 and 250. The current waiting list is weighted towards Burpham, Merrow and the eastern town centre, and the Westborough / Rydes Hill area. However, no sites are likely to become available in this area. Park Barn and Westborough have a higher proportion of allotment holders than the average; our sites at Farnham Road and Aldershot Road (Westborough Allotments) are full, and a number of other tenants resident in these areas are accommodated at Bellfields, our largest site. New houses have small gardens, they will not be large enough for people to grow their own, and hence likely that more residents will want allotments. 	<p>Policy ID4 has been amended to refer to the Open Space, Sports and Recreation Assessment. This document identifies the need for additional forms of open space across the borough, including allotments.</p> <p>Guildford currently has adopted open space standards and will seek provision of new open space, including allotments, in line with these standards. Future Development Management policies will set out new standards, drawing on the proposed standards set out in the Open Space, Sports and Recreation Assessment. The completed Local Plan will require the provision of new open space, including allotments, to meet identified needs.</p> <p>In the Local Plan Strategy and Sites, individual site policies have identified the need to protect allotments provision where relevant, and a new site for allotments has been proposed in Ash (site A31, 0.76 ha). Site A21 in Guildford, which is currently in use as allotments, has been allocated for additional allotments.</p> <p>Paragraph 4.6.31 has been amended to specifically refer to allotments as a form of green and blue infrastructure.</p>

<p>A site at Blackwell Farm would prove popular, both for the new residents there and the additional demand from Park Barn / Westborough. Similarly, a site within the Gosden Hill development would be welcomed.</p>	
<p>Representations on Specific Issues</p>	
<ul style="list-style-type: none"> A number of proposed development sites threaten ancient woodland. Ancient woodland is an irreplaceable natural resource and is protected by NPPF para 118 "planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland...". 	<p>Ancient woodland is identified on the Local Plan Strategy and Sites policies map and site policies identify ancient woodland where it falls within or adjacent to the site boundary. NPPF protection will apply to this woodland. It is not considered necessary to repeat the protection in this policy.</p>
<ul style="list-style-type: none"> GBC has been tasked with the specific action in the River Basin Management Plan that, when developing new DPDs and when making planning decisions, the planning authority should use evidence relating to "priority water bodies" (those that have been assigned "bad"/"poor" status, such as the River Wey), alongside other relevant evidence, to influence the location and scale of future development [12]. There is no indication in the Plan of how GBC has fulfilled this requirement. [12]Environment Agency River Basin Management Plan, Thames River Basin District December 2009, p24. 	<p>The River Basin management Plan for the Thames River Basin (the RBMP) 2009 has been superseded by the RBMP 2015. The RBMP 2015 requires the Council to consider the impacts of pollution and urban diffuse pollution pressures on hydromorphology and water quality when preparing spatial plans. Councils are also required by the RBMP 2015 to ensure new developments address potential pollution problems by; using sustainable drainage systems, commissioning Water Cycle Studies, and setting out Local Plan policies requiring new homes to meet the tighter water efficiency standard of 110 litres per person per day (as described in Part G of Schedule 1 to the Buildings Regulations 2010).</p> <p>The Local Plan: Strategy and Sites meets these requirements at the strategic level (note: the Local Plan is not supported by a Water Cycle Study, but is supported by a Water Quality Assessment which the Environment Agency has agreed is acceptable). The Local Plan: Development Management policies will be able to go into more detail identifying specific measures and projects. ID4 requires development likely to have an impact on waterways to demonstrate how they have followed EA guidance on implementation of the Wey Catchment Management Plan.</p> <p>The EA has not objected to the spatial pattern of development proposed in the plan.</p>

<ul style="list-style-type: none"> P136. <i>“Proposals for development must demonstrate how they will deliver appropriate net gains in biodiversity where possible.”</i> Recommend that the following is added: <u>Proposals that would reduce biodiversity will not generally be accepted.</u> 	<p>This proposed text does not add new that is not already covered by the original text, but uses negative wording.</p>
<ul style="list-style-type: none"> A section in this policy referring to Local Green Spaces is required, as it is notably missing throughout this Plan. 	<p>Paragraph 4.6.56 refers to Local Green Space and sets out the reasons as to why it is not being addressed at this stage.</p>
<p><i>Representations on Specific Sites</i></p>	
<p><i>Regarding the fields behind Shalford Village Hall:</i></p> <ul style="list-style-type: none"> There is no logic in making the proposed changes and then designating the fields as "Open Space". If the Council wishes to avoid the inevitability of a development on this land then the best thing would be to keep the Green Belt protection, not include the fields within the Settlement Boundary and further, declare it Local Green Space and subject to Special Calling it Open Space is, as currently proposed, unclear and likely to be easily overturned by the developers. The expressed view of the local community is that this land should be left undeveloped. These fields contribute to the open character of this part of the village of They rise 32 feet above King's Road. Buildings of any height would change the skyline of Shalford and tower over and detract from the enjoyment of the many users of the tennis, Bowls Clubs, the Village Hall and the Common. 	<p>The Local Plan proposes to inset Shalford village, including the site in question, into the Green Belt and also proposes to designate the site as Open Space. These two proposals follow two separate and different methodologies.</p> <p>The NPPF requires the Local Plan to exclude (inset) villages from the Green Belt if they do not have an open character which contributes to the openness to the Green Belt. Shalford has been assessed against this test and does not have such a character, and therefore is to be inset from the Green Belt. The proposed Green Belt boundary has followed national guidance, which requires it to follow defensible lines, resulting in the fields in question being included within the inset boundary.</p> <p>Within villages proposed for inseting, all open spaces (not including development sites on the edge of villages) have been assessed to establish whether they should be protected from development by virtue of their value as Open Space under the NPPF definition (see the Assessment of Sites for Amenity Value 2017). The assessment finds that the fields in question do have value for visual amenity and they are designated as Open Space for that reason.</p>

Regarding the fields behind Shalford Village Hall:

- Objection to the designation of the land to the rear of Greenhill and Burnside, Chinthurst Lane, Shalford as Open Space.

The site is private land which is inaccessible to the public and therefore has no amenity value with respect to providing opportunities for sports and recreation. It appears that the site has been designated entirely due to its 'aesthetic value' and that as a result the overall amenity value is scored as 'High'.

The site is well contained by high hedgerow to its southern boundaries adjacent to the public footpath, and is set substantially back from the road frontage of Chinthurst Lane. Due to the location and positioning of the site, there are very limited views towards the site from the public realm on Chinthurst Lane and further afield. The elevated position of the site means any views into the site from the tennis club are limited. The only views into the land are from private properties at first floor level, and limited views from the private sports club.

As per previous representations, and to demonstrate the minimal visual amenity value of this site, we have again appended a series of images at Appendix 2 which accompanied representations made in July 2016. These images show that the site is not visible from the public footpath, with the exception of over the entrance gate, and that there is very limited visibility towards the site from the public realm on Chinthurst Lane or the sports club.

The Council's Assessment of Sites for Amenity Value 2017 (the assessment) looks at open land within villages that are proposed to be inset from the Green Belt and assesses it for value as Open Space against the criteria set out in the NPPF. The NPPF defines Open Space as "All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as visual amenity".

The assessment finds that the site is adjacent to a private sports centre, there is a public right of way along the southern boundary, and the site offers aesthetic value due to its elevated position, and therefore has public amenity value. The assessment indicates that the land should be identified as Open Space but states that "partial development could potentially improve amenity value by making the land accessible" while "full development would result in loss of amenity value".

The site reference in the assessment is ETH_088.

The Council's view is that the NPPF definition of Open Space covers land that does not offer recreational value but does offer value for visual amenity. The Council also agrees with the findings of the assessment and agrees that the land has public visual amenity, and therefore has decided that the land in question is appropriate to be designated as Open Space.

Objection to the designation of land off Heath Drive, Send, Woking, Surrey, GU23 7EP as Open Space:

- The site was initially proposed to be allocated as Open Space under policy I4 in the Submission Version Local Plan (Regulation 19) in 2016.

The evidence base studies were updated following the 2016 Consultation. The Assessment of sites for Amenity Value 2017 was published in June 2017 and the Guildford Open Space, Sport & Recreation Assessment 2017. The site has been reclassified as “private space” in the Open Space, Sports and Recreation Assessment. This indicates that it has no open space value for recreation. As such, we understand that the site is only allocated as open space for its amenity value.

Send Surrey Limited obtained advice from Counsel in February 2017. Our Barrister - Andrew Tabachnik QC - has provided his Opinion on the draft Open Space allocation; this is attached in Appendix 3. Andrew Tabachnik QC concludes his Opinion as follows:

“I have no hesitation in concluding that the draft allocation of the Site as “open space” is inappropriate and unlawful. The Site does not fulfil the requirements set out in the NPPF, and the evidence base relied upon was materially flawed”

It is also clear that the allocation of the site for its amenity value is unnecessary. The analysis of the results in Section 5 of the assessment states: *A number of sites scored either Medium or High for their amenity value, and it is these sites which should be protected as Open Space. A number of sites that scored Medium or High may not require protection as Open Space because their amenity value could be retained or enhanced if the site is developed (or only partially developed).* The 2017 amenity assessment indicates that the site is of ‘medium’ value and comments that “Partial development could retain and potentially improve amenity value” (page 139). Therefore, in accordance with this

The NPPF defines Open Space as “All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as visual amenity”. The Council’s view is that the NPPF definition of Open Space covers land that does not offer recreational value but does offer value for visual amenity.

The Council has produced the Assessment of Sites for Amenity Value (the assessment), which looks at open land within villages that are proposed to be inset from the Green Belt and assesses it for value as Open Space against the criteria set out in the NPPF. The assessment finds that the site is; i) covered by sycamore-dominated woodland, consisting of semi-mature trees with nice understory, with some very mature oak and chestnut trees, ii) that there are views in and out of the site, and iii) that the site has both aesthetic and biodiversity value. The assessment concludes that the land should be designated as open space but that partial development could retain and potentially improve amenity value.

The site reference in the assessment is ETH_084.

The Council disagrees that the site cannot be appreciated for its amenity value as it is visible from the River Wey Navigation towpath and contributes to the character of the towpath in that location. The Navigation Towpath is one of Guildford borough’s most significant public spaces. The site is also adjacent to the River Wey Navigation Conservation Area and as such contributes to the setting of the Conservation Area. Therefore, the Council’s view is that it is appropriate to designate the site as Open Space as the site has public value for visual amenity.

The statement that the methodology behind the Assessment of sites for Amenity Value (GBC, 2017) has ‘not been made available’ is

<p>guidance, it does not require protection as open space. This is further evidenced by the fact that Send Surrey Limited has received pre-application advice from the Council to state that the site is developable subject to retaining the features of amenity value (Appendix 4). the site is covered by a group Tree Preservation Order (TPO). This, in itself, protects the features which provide the site's amenity value, the trees. The TPO is given in Appendix 5.</p> <p>There is no need for an open space designation. The site abuts the Green Belt on the northern boundary, beyond this boundary there is open countryside, a vast expanse of open space. There is no need to allocate a parcel of land on the edge of the Green Belt as open space. Additionally, the site is on the side of the village, therefore its openness cannot be appreciated; it simply appears to be the edge of the village. Open space should only be designated for amenity when it is in an appropriate location which allows it to be appreciated as such, i.e. a village green.</p> <p>It is also important to note that that the site's assessment methodology which is set out in the Amenity Audit Spreadsheet has not been made available to Send Surrey Limited. A request to obtain a copy of this was denied by the Council. We therefore request that the Inspector makes this document available at Examination.</p> <p>The should be allocated for housing.</p>	<p>incorrect. There is an explanation of the methodology set out in the assessment. The respondent requested a copy of the Amenity Audit Spreadsheet on Friday 21st July, which sets out the workings out for the scoring of sites in the study. A second request was received via email on Monday 24th July and the respondent was provided with the document on Tuesday 25th July.</p> <p>The site has been included in the updated LAA as a housing site capable of accommodating up to 20 homes, given the constraints on the site. The amount of housing that can be accommodated is below the threshold for the site to be allocated in the Local Plan.</p>
<ul style="list-style-type: none"> Manor Farm, Tongham forms part of the Strategic Site Allocation A29. As part of the current planning application / appeal, bespoke SANG at Tongham Road, Runfold is to be brought forward. Objection is made to the omission of this bespoke SANG from the list of proposed SANG at Appendix C of the Plan. The proposed SANG should therefore be incorporated as new SANG13. 	<p>Appendix C draws on the Infrastructure Delivery Plan (IDP), which sets out a suite of SANGs that could be used to deliver the proposals for residential development in the plan. The IDP identifies the SANG at Ash Lodge Drive as being so most appropriate SANG to provide mitigation for south Ash. This is partly because it already has planning permission, while Manor Farm SANG does not, but also because it is located nearer the settlement so may be more attractive to residents.</p>

Main issues with Site Allocations

General site comments (Sites – Introduction and Summary)

No main issues.

Draft

A1 The Plaza

Main Issue	Guildford Borough Council Response
<p>Representations from Prescribed Bodies and Selected Stakeholders</p>	
<p>Landowner</p> <ul style="list-style-type: none"> Use should be residential (Use Class C3) and/or assisted living accommodation for older people (Sui Generis). <p>Site can accommodate 90-100 dwellings. No evidence presented to support/justify allocation of 70 homes.</p>	<p>Allocation amended to include accommodation for older people (C2).</p> <p>Capacity increased to 90 homes.</p>
<p>National Trust</p> <ul style="list-style-type: none"> Requirements should refer to views into the River Wey Corridor Conservation Area. <p>The opportunity for 'improvements and reinstatement for pedestrian access and public realm' should be included under the 'requirements'.</p>	<p>Amended to read views into and out of surrounding conservation areas as it impacts more than one conservation area.</p> <p>Appropriate to stay in opportunities.</p>
<p>Thames Water</p> <ul style="list-style-type: none"> Water network capacity in this area is unlikely to be able to support the demand anticipated from this development. <p>Upgrades required – can take 18 months to 3 years to deliver.</p> <p>Detailed water supply strategy and planning condition required.</p>	<p>Policy ID1 is targeted to ensure the timely provision of infrastructure necessary to support new development. At the site level, any planning permission may be subject to a Grampian planning condition, preventing occupation until any necessary upgrades have been made.</p>

A2 Guildford cinema

Main Issue	Guildford Borough Council Response
<p>Representations from Prescribed Bodies and Selected Stakeholders</p>	
<p>Network Rail</p> <ul style="list-style-type: none"> Should consider the car parking requirements and opportunities of this location in close proximity to both the town centre and Guildford Railway Station. <p>Suggest the following amendment: <i>Improve the links along the river, to and from the town centre, and to and from the railway station.</i></p>	<p>Policy amended accordingly.</p>
<p>Environment Agency</p> <ul style="list-style-type: none"> Noted that Policy A2 and A6 are designated flood zone 3b developed and have been allocated within flood zone 3b. We acknowledge that Guildford Borough Council have provided reasoning for these site allocations within the evidence base. We do not wish to raise a point of soundness regarding these allocations and leave it for the Inspector to provide their view on this matter. 	<p>Section 2.6 of the Strategic Flood Risk Assessment Volume 1 Final Decision Support Document (July 2016) and page 10 of the Flood Risk Sequential and Exception Test (May 2016) provide sufficient justification for allocating sites in Flood Zone 3b that are developed. Provided a proposed redevelopment does not increase flood risk on the site or elsewhere in the surrounding area, then it complies with national planning policy on flood risk. These site allocations and policy P4 (4) are therefore sound.</p>

A3 Land between Farnham Road and the Mount, Guildford

Main Issue	Guildford Borough Council Response
<p>Representations from Prescribed Bodies and Selected Stakeholders</p>	
<p>Surrey County Council</p> <ul style="list-style-type: none"> The access should be from The Mount for refuse and removal/service vehicles only, although it is recognised that this would have significant impact in terms of tree cover, gradients, and the need to remove much of the existing wall on the north side of the carriageway. <p>If the site were to be car free (which Surrey County Council supports), and given that there is currently no vehicular access to the A31, it is not apparent what improvements/ or re-build of Farnham Road Bridge the development should be liable for. Land may be required for a re-build of Farnham Road Bridge and this might need to be secured from the site.</p>	<p>Access from Ranger House considered to be a more appropriate access.</p> <p>Potential re-build of Farnham Road Bridge moved to opportunity section as although this will be a car-free site access will be required for refuse vehicles and should Farnham Road Bridge be re-built there would be potential access arrangements that would interact with this site.</p>
<p>Network Rail (landowner)</p> <ul style="list-style-type: none"> Following recent discussions with the Council about the potential for this site, we would request that an additional opportunity be added that it may be possible to configure the site to incorporate some rail related car parking (subject to access requirements being resolved). 	<p>This is not part of the car parking strategy for Guildford.</p>

<p>Thames Water</p> <ul style="list-style-type: none">• Water supply network capacity in this area is unlikely to be able to support the demand anticipated from this development. <p>Upgrades required – can take 18 months to 3 years to deliver.</p> <p>Detailed water strategy and planning condition required.</p>	<p>Policy ID1 is targeted to ensure the timely provision of infrastructure necessary to support new development. At the site level, any planning permission may be subject to a Grampian planning condition, preventing occupation until any necessary upgrades have been made.</p>
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Draft

A4 Telephone Exchange, Guildford

Main Issue	Guildford Borough Council Response
<p>Representations from Prescribed Bodies and Selected Stakeholders</p>	
<p>Surrey County Council</p> <ul style="list-style-type: none"> • Excellent opportunity for use as a bus station, being mid-way between Waitrose, the expanded North Street site, and North Street. 	<p>Site removed from the plan as not deliverable over plan period.</p>
<p>Thames Water</p> <ul style="list-style-type: none"> • Water network capacity in this area is unlikely to be able to support the demand anticipated from this development. <p>Upgrades required – can take 18 months to 3 years to deliver.</p> <p>Detailed water supply strategy and planning condition required.</p>	<p>Site removed from the plan as not deliverable over plan period.</p>
<ul style="list-style-type: none"> • Object to the removal of the site allocation as it is contrary to the brownfield first policy and is in a sustainable location. Previously developed sites should be maximised to reduce reliance on Greenfield sites. Lease expires in 2025, which is within the plan period. 	<p>The lease agreement extends out to 2031 rather than 2025 and the intention is to extend occupation beyond this date, as the site is an important node for BT.</p>

A5 Jewsons, Walnut Tree Close

Main Issue	Guildford Borough Council Response
<p>Representations from Prescribed Bodies and Selected Stakeholders</p>	
<p>Landowner</p> <ul style="list-style-type: none"> Site capacity should be greater. <p>Site should be flexible use to include employment and student accommodation.</p> <p>Site should be extended to include land within their ownership which is identified for the Sustainable Movement Corridor under Policy A10 Land for Sustainable Movement Corridor Town Centre Phase 2.</p> <p>Proposed that consideration be given to the provision of a shared pedestrian and cycle route through the site linking Station View with Walnut Tree Close.</p>	<p>Site capacity increased.</p> <p>Allocation retained as C3 but should additional capacity be considered likely on site then other main town centre uses could be permitted alongside the housing as long as the housing number is not lower than the allocation.</p> <p>Amended site area to include land within the ownership of the landowner, which was previously identified in the Draft Local Plan 2017 as part of the area of Policy A10 Land for Sustainable Movement Corridor Town Centre Phase 2.</p> <p>New requirement, numbered (2) added in the Draft Local Plan 2017 that a direct pedestrian and cycle route will be provided through the site from the Yorkies Bridge access road to Station View as part of the Sustainable Movement Corridor.</p>
<ul style="list-style-type: none"> New requirement, numbered (2), which requires that 'A direct pedestrian and cycle route will be provided through the site from the Yorkies Bridge access road to Station View as part of the Sustainable Movement Corridor, having regard to the Sustainable Movement Corridor Supplementary Planning Document' is unsound because it makes reference to, and places justification on, a Supplementary Planning Document that has not been prepared or adopted. 	<p>Paragraph 153 of the NPPF states that '<i>additional development plan documents should only be used where clearly justified</i>' and that '<i>Supplementary planning documents should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development</i>'.</p> <p>The Sustainable Movement Corridor scheme is included in the Infrastructure Schedule at Appendix C of the Submission Local Plan. The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the Plan depends. It is</p>

	<p>considered necessary to deliver the level of strategic planned growth in the Guildford urban area in a sustainable way. The concept of the Sustainable Movement Corridor was first proposed by consultant Arup in the Guildford Town and Approaches Movement Study. The Council has subsequently undertaken, and continues to progress, study work for the design of the route sections of the Sustainable Movement Corridor.</p> <p>The Enterprise M3 Local Enterprise Partnership has made a provisional allocation of £12.5 million for various projects in Guildford borough, including around £3.9 million for elements of the Sustainable Movement Corridor: West route section (scheme reference: SMC1). It is proposed that Guildford Borough Council will also make a contribution. Surrey County Council and Guildford Borough Council consulted on proposals for elements of SMC1 in September–October 2017 to inform the decision as to which elements should be delivered first, with the rest of SMC1 delivered in the future when further funding is secured. A business case for those elements to be funded by the LEP and the Council is to be submitted to the LEP in November 2017.</p> <p>The Transport topic paper (2017) includes further information on the rationale for, and progress in advancing the designs of, the route sections of the Sustainable Movement Corridor.</p> <p>Policy A5 does not place justification on the Sustainable Movement Corridor Supplementary Planning Document. The Key Evidence supporting Policy ID3 includes the Guildford Borough Transport Strategy 2017 (Guildford Borough Council, 2017) and the Guildford Town and Approaches Movement Study (Arup, 2015), which both provide justification for the Sustainable Movement Corridor. Paragraph (3) of Policy ID3 addresses the relationship between new development and the Sustainable Movement Corridor. The Council consider that the Sustainable Movement Corridor Supplementary Planning Document will both ‘help applicants make successful applications’ and ‘aid infrastructure delivery’.</p>
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- New requirement, numbered (3), which requires that 'Vehicular access to the site will be from Station View' is unnecessary and unsound because:
 - restricting vehicular access to the site would limit the options and flexibility for redevelopment and so undermine the site's redevelopment potential,
 - access from Station View is secondary access to the site and Station View is not adopted highway, and
 - if the rationale for this change relates to traffic generation level, would not agree that vehicular access via the Yorkie's Bridge access road would give rise to traffic generation levels which would undermine the Council's Sustainable Movement Corridor schemes.

Following the delivery of scheme SMC2 Sustainable Movement Corridor: Yorkie's Bridge, the redevelopment of the Jewsons site (Policy A5) and the delivery of scheme SMC4 Sustainable Movement Corridor: Town Centre Phase 2 on the site allocated by Policy A10, buses using the Sustainable Movement Corridor will be able to cross the replacement new Yorkie's Bridge and continue to Walnut Tree Close via the new Yorkie's Bridge access road.

The phasing of the route sections is described in the Transport topic paper (2017).

Initial feasibility design work has shown that the junction of the Yorkie's Bridge access road with Walnut Tree Close will need to be controlled by traffic signals due to the restricted space available for buses to turn in and out of the Yorkies Bridge access road.

The Council acknowledges that the existing Jewson use has customer access from the Yorkie's Bridge access road. However, mixing site-related vehicular traffic with buses on the proposed Sustainable Movement Corridor is considered to be impractical on the Yorkie's Bridge access road and its junction with Walnut Tree Close and could result in highway safety issues or prevent the delivery of scheme SMC4 Sustainable Movement Corridor: Town Centre Phase 2.

As the site has vehicular access from Station View, we consider that the opportunity should be taken as part of the site allocation to close the access from the Yorkie's Bridge access road and have the future vehicular access solely from Station View.

An adjacent site (Station View) has recently been redeveloped for residential and office use, with vehicular and pedestrian access solely from Station View. There is no evidence that access limited the options or flexibility for this site or undermined the site's redevelopment potential.

<p>Network Rail</p> <ul style="list-style-type: none"> Development close to the station is likely to place an increased passenger load on the station therefore request that an additional requirement be added to contribute through any Section 106 agreement to funding station improvements. 	<p>The Council will not be amending the policy on this site to specifically mention funding station improvements, as until an application is submitted the impacts on the station itself cannot be adequately defined. All development in Guildford could increase passenger load on the station.</p>
<p>National Trust</p> <ul style="list-style-type: none"> Should include an additional requirement that the scale and design of any new buildings on this site have regard to the setting of the River Wey Corridor. 	<p>This is not justified given the distance of the site from the Conservation Area.</p>
<p>Environment Agency</p> <ul style="list-style-type: none"> Although this site lies within flood zone 1, safe access may be questionable. It does not appear that this has been taken into account and no evidence that demonstrates that safe access is achievable has been provided. 	<p>This has been addressed in the update of the Level 2 SFRA.</p>
<p>Thames Water</p> <ul style="list-style-type: none"> Water and wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. <p>Upgrades required – can take 18 months to 3 years to deliver.</p> <p>Detailed water supply strategy, drainage strategy and planning condition required.</p>	<p>Policy ID1 is targeted to ensure the timely provision of infrastructure necessary to support new development. At the site level, any planning permission may be subject to a Grampian planning condition, preventing occupation until any necessary upgrades have been made.</p>

A6 North Street, Guildford

Main Issue	Guildford Borough Council Response
<p>Representations from Prescribed Bodies and Selected Stakeholders</p>	
<p>Site promoter</p> <ul style="list-style-type: none"> Capacity of the allocation should be increased to: “45,000 sq m retail (A1), 6,000 sq m food and drink (A3 and A4) and 30,000 sq m of residential (up to 400 units of studios, 1 bed, 2 bed and 3 bed)”. The replacement bus facilities should be provided off site. 	<p>The food & beverage and residential allocation has been increased. This has however been caveated to show that the provision of retail is the priority. The A1 retail need has been reduced to take account of revised need identified in the Retail Study Addendum 2017.</p> <p>No change to wording on bus facilities as the solution has not yet been determined or agreed.</p>
<p>Surrey County Council</p> <ul style="list-style-type: none"> <i>Bus Interchange</i> – The principle of re-locating the bus station/ provision of an interchange elsewhere in the town, has not yet been established through the current study which has not yet reported. <p><i>Transport</i> – Include as a separate bullet point: ‘Full assessment, and implementation of mitigation measures to accommodate the increased travel demand from the development, and changes to the town centre network for private traffic, deliveries, and buses.’</p> <p><i>Assessments</i> – There is a need to include a separate bullet point, “Transport.”</p> <p><i>Key Considerations</i> – There is a need to include “Transport/infrastructure” as a separate bullet point.</p>	<p>The site allocation wording is flexible given the solution has not yet been determined or agreed.</p> <p>Have included a separate requirement, numbered (11), but have not included the wording ‘Full assessment and implementation of’ as this would be expected of all developments generating significant traffic movements and is covered in other policies.</p> <p>Not considered necessary as covered by other policies.</p> <p>Not considered necessary as covered by other policies.</p>

<p>Thames Water</p> <ul style="list-style-type: none"> • Water and wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. • Upgrades required – can take 18 months to 3 years to deliver. • Detailed water supply strategy, drainage strategy, and planning condition required. 	<p>Policy ID1 is targeted to ensure the timely provision of infrastructure necessary to support new development. At the site level, any planning permission may be subject to a Grampian planning condition, preventing occupation until any necessary upgrades have been made.</p>
<p>Thames Water</p> <ul style="list-style-type: none"> • Water treatment capacity in this area may be unable to support the demand anticipated from this development. • Minor upgrades may be required – can take 18 months to 3 years to deliver. 	<p>Policy ID1 is targeted to ensure the timely provision of infrastructure necessary to support new development. At the site level, any planning permission may be subject to a Grampian planning condition, preventing occupation until any necessary upgrades have been made.</p>
<p>Environment Agency</p> <ul style="list-style-type: none"> • Note that Policies A2 and A6 are designated flood zone 3b developed and have been allocated within flood zone 3b. We acknowledge that Guildford Borough Council have provided reasoning for these site allocations within the evidence base. We do not wish to raise a point of soundness regarding these allocations and leave it for the Inspector to provide their view on this matter. 	<p>Section 2.6 of the Strategic Flood Risk Assessment (SFRA) Level 1: Volume 1 Final Decision Support Document (July 2016) and page 10 of the SFRA Level 1: Flood Risk Sequential and Exception Test (May 2016) provide sufficient justification for allocating sites in Flood Zone 3b that are developed. Provided a proposed redevelopment does not increase flood risk on the site or elsewhere in the surrounding area, then it complies with national planning policy on flood risk. These site allocations and policy P4 (4) are therefore sound.</p>

<p><i>Scale of allocation:</i></p> <ul style="list-style-type: none"> Food and drink allocation doubled – this is not needed. 	<p>The Retail and Leisure Study 2014 (and 2017 update) indicate a strong need for new retail space in the town centre, including food and drink uses, which provide an increasingly important part of a town centre's wider offer and economy, complementing other town centres uses, particularly shops, offices and cinemas, and helping to lengthen 'dwell times'. The retail uses allocated in the Local Plan are in line with this assessment. The Retail and Leisure Study and 2017 update indicate forecast capacity (need) for food and beverage (use class A3 and A4) between 2,350 sq m gross to 3,133 sq m gross in 2025, increasing to 7,000 sq m gross and 9,333 sq m gross by the end of the plan period (2034).</p> <p>The forecast figure for food and beverage (use class A3 and A4) floorspace is larger than the 6,000 sq m allocated for the North Street site, despite that site being earmarked to take most of the forecast retail need for the Plan period. The retail study emphasises the importance of directing retail and leisure floorspace to the town centre to help increase competition and choice, and to help underpin the centre's daytime/evening economy in accordance with national and local policies.</p>
<ul style="list-style-type: none"> Residential allocation doubled – implications for the density needed on the site to achieve this. 	<p>The residential part of the allocation has been expressed as an "up to" to reflect the fact that the overall scale of the allocated uses may be in excess of what could be appropriately achieved on the site once detailed design work has been undertaken.</p>
<ul style="list-style-type: none"> The retail part of the allocation should not be expressed as a minimum. <p>Residential should be maximised.</p>	<p>The site is important for meeting the borough's OAN for retail floorspace to 2034. To ensure that we can deliver this, and to achieve a sustainable future pattern of retail development, we consider that it is more appropriate to allocate a minimum retail floorspace figure on this site and for the allocated residential figure to be a maximum of 400 homes. This would allow developers to propose a higher amount of retail and/or leisure development than specified, but not less than this. National planning guidance states that town centres should be</p>

the sequentially most preferable location for retail development. Therefore, although it is appropriate to include some residential development on the site, we feel that the proposed retail and leisure uses in Policy E7 should not be overly diluted by residential or other uses that do not directly contribute to the town centre's liveliness and economic vitality.

Draft

A7 Land and buildings at Guildford station

Main Issue	Guildford Borough Council Response
<p>Representations from Prescribed Bodies and Selected Stakeholders</p>	
<p>Network Rail and Solum</p> <ul style="list-style-type: none"> • Based on the extensive analytical work by Solum Regeneration (Guildford) LLP, working closely with Network Rail to identify what would constitute a viable proposal on this site, the allocation bullets should be amended to read: <ul style="list-style-type: none"> • Improved transport and interchange facilities • Approximately 450 homes (C3) dwellings • Additional retail (convenience and comparison) and food and drink offer and • Additional complementary offices and leisure uses 	<p>Requirement (1), which was added in the Draft Local Plan 2017, provides for 'Improved transport and interchange facilities having regard to the Sustainable Movement Corridor Supplementary Planning Document'.</p> <p>The quantum of development has not been increased as this scale is not considered appropriate at this site.</p>
<p>Network Rail</p> <ul style="list-style-type: none"> • Any plans to develop the site should take account of railway requirements relating to the station building and the need for it to be able to accommodate future growth in passengers. In addition, any proposals should also address the permeability of the site from east to west via the footbridge. 	<p>Requirement (1), which was added in the Draft Local Plan 2017, provides for 'Improved transport and interchange facilities having regard to the Sustainable Movement Corridor Supplementary Planning Document'.</p> <p>In addition, it is considered that Network Rail, as the site owner, is able to bring forward plans to redevelop the site taking account of future railway requirements.</p>

<p>The National Trust</p> <ul style="list-style-type: none"> The 'opportunities' listed under this policy really should be 'requirements' of any redevelopment of this site. All development on this site must have particular regard to the corridor of the River Wey Conservation Area. Particularly with regard to scale, height and massing of new buildings in juxtaposition with the neighbouring historic Billings Warehouse buildings, which provide the back drop to the Navigations. 	<p>Added reference in the requirements to views in and out of nearby conservation areas.</p>
<p>Thames Water</p> <ul style="list-style-type: none"> Water treatment and wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. <p>Upgrades required – can take 18 months to 3 years to deliver.</p> <p>Detailed drainage strategy and planning condition required.</p>	<p>Policy ID1 is targeted to ensure the timely provision of infrastructure necessary to support new development. At the site level, any planning permission may be subject to a Grampian planning condition, preventing occupation until any necessary upgrades have been made.</p>
<ul style="list-style-type: none"> The rail station needs to be interlinked to all bus services, not only those using the Sustainable Movement Corridor. 	<p>Bus services using the Sustainable Movement Corridor, following the delivery of the Sustainable Movement Corridor Town Centre Phase 2 scheme, will directly connect the rail station and the existing bus station or future new Guildford Town Centre bus facilities (scheme BT1).</p>

A8 Land west of Guildford railway station, Guildford Park Road

Main Issue	Guildford Borough Council Response
<p>Representations from Prescribed Bodies and Selected Stakeholders</p>	
<p>National Trust</p> <ul style="list-style-type: none"> Although on the other side of the railway station, the land levels are such that the scale and massing of new development on this site must also have regard to the impact upon the corridor of the River Wey Conservation Area, as set out above. 	<p>Requirement added in relation to views in and out of conservation areas.</p>
<p>Surrey County Council</p> <ul style="list-style-type: none"> Under “Opportunities” we would like to see included: <i>“Provision of a bus / rail interchange on the west side of the railway clear of Guildford Park Road, with other limited facilities”.</i> 	<p>Opportunity added.</p>
<p>Network Rail</p> <ul style="list-style-type: none"> In relation to land on the west side of Guildford Station a statement has been included earmarking the land for future station expansion which we are pleased about. <p>Although future development may include housing, we are keen that the site does not become too constrained by development that we are unable to expand the station in the future. Network Rail are working with local authorities, LEPs and MPs to develop a coherent and joined up strategy for Guildford Station that will include the expansion of platform capacity that is likely to require some of the land to the west.</p> <p>Furthermore, either in the allocation or requirements the</p>	<p>Wording added to opportunities to enable maintenance access.</p> <p>Amended wording in Opportunities to include retention of some station car parking and “employment” uses amended to “commercial” uses.</p> <p>The access from the Guildford Park Car Park site (Policy A11) to the Land west of Guildford railway station site (Policy A8) has been closed for a number of years and there is alternative access to the Policy A8 site. The landowners of the sites could seek to negotiate an easement.</p> <p>It is considered that the Allocation is not incompatible with the retention of the Maintenance Delivery Unit, in part or whole.</p>

<p>policy should refer to the current rail Maintenance Delivery Unit (MDU):</p> <ul style="list-style-type: none"> • The MDU is currently required to be on site. • It is possible that in the future some elements of the unit may be relocated to the Route Operating Centre but it is expected that there will always be a need for at least part of the unit to remain on site and for the rail maintenance teams to gain access to the railway from the land on the west side of Guildford Station. <p>In the opportunities, we suggest the following:</p> <ul style="list-style-type: none"> • Amending the first bullet point to read: In combination with realising the Guildford platform capacity scheme, there is a <i>potential</i> opportunity to redevelop this site for <i>station car parking, housing, student housing and / or employment uses and (limited) retail</i>. • There is an opportunity for the Council to re-open the rail maintenance access adjacent to the old signal box site from the road through the Guildford Park Car Park. This would potentially allow all or part of the MDU to be relocated further to the north, thus enabling continued rail maintenance access and helping to bring forward development of the A8 site. • Amending the second bullet point to read: <i>Subject to funding being provided by the beneficiary development and future railway requirements, create a new pedestrian and / or cycle route on the west side of the railway tracks between the Guildford Park Car Park Site.</i> 	<p>The Council considers that there is sufficient flexibility provided by the existing wording of the second opportunity and the provisions of Policy ID1.</p>
<p>Network Rail</p> <ul style="list-style-type: none"> • As noted in the Local Plan, this land has a number of operational uses that will need to be considered in any decision on allocating this site for development. 	<p>Opportunity (2) for the creation of a new pedestrian and cycle route was amended in the Draft Local Plan 2017 to state that 'this could also serve as a maintenance access to the signal box adjacent to Guildford Park Car Park'. Network Rail's response is considered to be consistent with this change.</p>

A9 Land to the rear of 77 to 83 and between 99 to 103 Walnut Tree Close, Guildford

Main Issue	Guildford Borough Council Response
Representations from Prescribed Bodies and Selected Stakeholders	
National Trust <ul style="list-style-type: none"> • More detail on design principles should be included to guide the redevelopment of this site to ensure no adverse impact upon the Conservation Area and setting of the River Wey. 	<p>Whilst this level of detail is considered too prescriptive, the “consideration of views in and out of the adjacent river Wey Conservation Area” has been added as a requirement.</p>
Surrey County Council <ul style="list-style-type: none"> • Under “Opportunities” we would like to see included “Potential facilitation of/ contribution to Sustainable Movement Corridor”. 	<p>Opportunity added.</p>
Site promoter <ul style="list-style-type: none"> • Allocation should be increased from 3,000 sq. m <ul style="list-style-type: none"> • The site currently consists of 3,470sq. m; • a further 400 sq. m could be accommodated within the gap between either 77-85 or 97-105 Walnut Tree Close; • A further building now demolished could increase it further still • Allocation should not be limited to B1 employment use. <ul style="list-style-type: none"> • Need for housing • Character of Walnut Tree Close is changing to become much more residentially orientated. • Suggest “The site is allocated for approximately 3,000 sq m of at least 3,870 sq. m of mixed use 	<p>The site is 100% located within Flood Zone 3, with 98.3% of the site located within Flood Zone 3b, which is the functional floodplain. Furthermore, 51.2% of the site is within Flood Zone 3b developed, which is the developed land within the functional floodplain. Developed land within the functional floodplain, as defined in the Guildford SFRA Level 1, constitutes the footprint of the building.</p> <p>As a result of this, the allocation is quantified in line with the existing floorspace, which is developed land within the functional flood plain.</p> <p>National flood policy does not allow uses considered to be of increased vulnerability (e.g. a change from B1 to C3) within flood risk areas. Paragraph 137 of the NPPF states that “Proposals that preserve those</p>

development including residential (C3) and offices (B1a)”

- Two changes proposed to the text beneath this policy are proposed in terms of:
 - Requirement
 - 3) Consideration of views towards the site from the adjacent River Wey Conservation Area.
 - Opportunities:
 - (2) Potential facilitation of / contribution to The site is well located in terms of the town’s existing Sustainable Movement Corridor with further enhancements set out in having regard to the Sustainable Movement Corridor Supplementary Planning Document Support. Accordingly, there is scope to relax the standard of on site car parking requirements which will in turn encourage and facilitate further car free modes of transport.
 - (5) Enhance views from Walnut Tree Close to the setting of and views from the River Wey Conservation Area and provide enhance the amenity of pedestrian access through the site to along the towpath facilitated by the site’s redevelopment.
- Concerns raised against the additional proposed requirements. Need to avoid unduly constraining the site's redevelopment potential. There are currently no views through the site to or from the River, nor any public right of way through the site. The site is already very constrained. As such it is not feasible to highlight the creation of such elements as a viable opportunity and this should therefore be amended to reflect reasonable opportunities as follows:

elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably”. It is therefore appropriate to retain the requirement to consider views in and out of the Conservation Area.

It remains appropriate to retain the opportunities as these are not requirements and can therefore be explored in more detail at the planning application stage.

GBC do not consider the additional opportunity in relation to Grade A offices is necessary as Policy E1 supports the redevelopment of outmoded floorspace that caters for modern business needs. The opportunity in relation to housing is not appropriate given the flooding constraints of the site.

The change in name is proposed as a minor modification.

- Two further opportunities proposed:
 - Opportunity (7) The provision of high quality, Grade A office accommodation facilitated by the site's redevelopment.
 - Opportunity (8) The provision of small residential units which are more affordable for students and young people and the corresponding increase in affordable housing units specifically.
- Site name
Heading to be amended to read:
Land to the rear of 77 to 83 and between 99 to 103
Walnut Tree Close, Guildford.

Draft

A10 Land for Sustainable Movement Corridor

Main Issue	Guildford Borough Council Response
<p>Representations from Prescribed Bodies and Selected Stakeholders</p>	
<p>Surrey County Council</p> <ul style="list-style-type: none"> In the 2003 Local Plan under Policy M7 (Access from Walnut Tree Close to Guildford Station) a scheme involved the Safeguarding of part of Walnut Tree Close. This no longer needs safeguarding for the reasons envisaged. However, some of the safeguarded land comprising the West/East alignment of the corridor may be needed for future operational purposes, for whatever schemes goes forward in this area. 	<p>Policy M7 in the 2003 Local Plan is proposed to be a superseded policy as shown in Appendix E of the Draft Local Plan 2016 and in subsequent versions of the Draft Local Plan.</p> <p>A small amount of the land allocated for Policy M7 in the 2003 Local Plan, as it crosses the Yorkie’s Bridge access road, is part of the site allocated by Policy A10 which is to be used for the Sustainable Movement Corridor: Town Centre Phase 2 scheme (scheme reference SMC4).</p>
<p>Landowner of Jewsons site</p> <ul style="list-style-type: none"> Object to Policy A10, on basis that it is not justified and does not represent the most appropriate strategy: <ul style="list-style-type: none"> Concern that site area of Policy A10, which is allocated for a Sustainable Movement Corridor: Town Centre Phase 2 scheme, includes a strip of land within the western and northern boundaries of their ownership of Jewsons site. Object to lack of certainty regarding the deliverability of schemes SMC4 and SMC2, given their assumption that SMC4 is dependent on SMC2, and that the status of both schemes is categorised as ‘anticipated’, as opposed to ‘committed’ schemes in the Guildford Borough Transport Strategy 2016 (Guildford Borough Council, June 2016). 	<p>That land in the Policy A10 site which is owned by the landowner of the Jewsons site (Policy A5), as proposed to be allocated in the Draft Local Plan 2016, was, in the Draft Local Plan 2017, removed from the Policy A10 site and added to the Jewsons site (Policy A5).</p> <p>Policy A5, as amended in the Draft Local Plan 2017, includes a requirement numbered (2) that a direct pedestrian and cycle route will be provided through the site from the Yorkies Bridge access road to Station View as part of the Sustainable Movement Corridor.</p> <p>The Council considers that scheme SMC4 Sustainable Movement Corridor: Town Centre Phase 2 is not dependent on scheme SMC2 Sustainable Movement Corridor: Yorkie’s Bridge; rather scheme SMC4 could be delivered with the redevelopment of the Jewsons site (Policy A5) and independent of scheme SMC2. Nevertheless, there</p>

Request that the land in their ownership be incorporated into the Policy A5 site and Policy A10 deleted.

As part of the redevelopment of the Policy A5 site, expanded as per their request that the land in their ownership be incorporated into the Policy A5 site, propose that there could be an opportunity to provide for a shared pedestrian and cycle route through their site inking Station View with Walnut Tree Close.

would be benefits in delivering the two schemes together.

Definitions of the status categories for transport schemes of 'committed' and 'anticipated' are given in the Guildford Borough Transport Strategy 2017 (Guildford Borough Council, December 2017) as follows:

- Committed: Definite funding has been secured and any remaining planning and statutory approvals will be straightforward to achieve
- Anticipated: Subject to a positive business case, funding can be secured and planning and statutory approvals achieved; or where there is a planning requirement to provide the scheme.

These status categories are not used to categorise schemes in the Infrastructure Schedule at Appendix C of the Submission Local Plan or in the Draft Local Plan 2016 or Draft Local Plan 2017.

When the transport schemes listed in Infrastructure Schedule at Appendix C of the Submission Local Plan are cross-referenced in the Guildford Borough Transport Strategy 2017, it can be seen that the majority have a 'anticipated', as opposed to a 'committed', status.

Landowner of Jewsons site

- The original objection that Policy A10 should be deleted is maintained and also object to the further changes to the policy with respect to:
 - Reference to the Sustainable Movement Corridor Supplementary Planning Document' (SPD) – making reference to this when it has not been produced is unsound.
 - Strongly object to the requirement for the Jewsons site (Policy A5) to only have vehicular access from Station View as this will severely prejudice both the existing and future operation of the site and undermine its redevelopment potential. Station View is not adopted highway and access is through the station car park and mixed use development to the south and is not suitable as the main access to the site.
 - There is no indication that the delivery of scheme SMC4 Sustainable Movement Corridor: Town Centre Phase 2 on the site allocated by Policy A10 will be implemented in tandem with the redevelopment of the Jewsons site under Policy A5. The operation of the Jewsons builders merchant site is reliant on its main vehicular access from Walnut Tree Close which is used by all customers and visitors and through which trade is undertaken. Taking away these access rights will prejudice this local employer.
 - Consider that the future site use would not give rise to traffic generation levels which would undermine the Council's aspirations for a Sustainable Movement Corridor in this location.

The Submission Local Plan only seeks to restrict vehicular access to the Jewsons site (Policy A5) for any future uses of the redeveloped site. Any proposal for the Sustainable Movement Corridor coming forward prior to the redevelopment of the site will have to take account of the existing use's traffic generation along the Yorkie's Bridge access road from Walnut Tree Close.

The other points were raised by the landowner with respect to Policy A5; please see Guildford Borough Council's response to these points in Policy A5.

A11 Guildford Park Car Park

Main Issue	Guildford Borough Council Response
<p>Representations from Prescribed Bodies and Selected Stakeholders</p>	
<p>Surrey County Council</p> <ul style="list-style-type: none"> Under “Requirements”, we would like to see included within the second bullet point: <i>“Potential route for the Sustainable Movement corridor”</i>. 	<p>Requirement (4) added.</p>
<p>Network Rail</p> <ul style="list-style-type: none"> Site has the potential to help unlock development on the A8 site on the west side of the railway station and to support rail maintenance access requirements. <p>The policy should be amended as follows:</p> <ul style="list-style-type: none"> Add a requirement to either re-open vehicle access to the railway from the road, adjacent to the current garages and the old signal box location or to provide for this to be re-opened in the future. Add a requirement to make a financial contribution to a fund for the future delivery of improvements to the west side of the station and the footbridge as future residents on this site are likely to use the railway footbridge and station, adding to the burden of congestion on the bridge. Add an opportunity to increase public parking on site, which would be compatible with supporting sustainable journeys by rail. 	<p>These changes are not considered necessary.</p> <p>The access from the Guildford Park Car Park site (Policy A11) to the Land west of Guildford railway station site (Policy A8) has been closed for a number of years and there is alternative access to the Policy A8 site. The landowners of the sites could seek to negotiate an easement.</p> <p>The tests for a planning obligation such as that requested by Network Rail have not been demonstrated in the Local Plan-making process. At the planning application stage, there will be further consideration of the transport impacts of any proposal for new development, and new development will be required to provide and/or fund the provision of suitable access and transport infrastructure and services that are necessary to make it acceptable. This is set out in Policy ID3.</p> <p>The site is currently occupied as a Council owned and operated surface level car park, which has 400 vehicle spaces and four coach spaces. The allocation includes a multi storey car park with appropriately 450 parking spaces.</p>

<p>Thames Water</p> <ul style="list-style-type: none">• Water network and wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. <p>Upgrades required – can take 18 months to 3 years to deliver.</p> <p>Detailed water and drainage strategy, and planning condition required.</p>	<p>Policy ID1 is targeted to ensure the timely provision of infrastructure necessary to support new development. At the site level, any planning permission may be subject to a Grampian planning condition, preventing occupation until any necessary upgrades have been made.</p>
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Draft

A12 Bright Hill Car Park

Main Issue	Guildford Borough Council Response
<p>Representations from Prescribed Bodies and Selected Stakeholders</p>	
<p>Holy Trinity Amenity Group</p> <ul style="list-style-type: none"> Capacity is too high to enable improvements to landscaping and biodiversity or provide a high quality development. 	<p>The capacity has been reduced from 60 to 40 homes.</p>
<p>Thames Water</p> <ul style="list-style-type: none"> Water network capacity in this area is unlikely to be able to support the demand anticipated from this development. <p>Upgrades required – can take 18 months to 3 years to deliver.</p> <p>Detailed water supply strategy and planning condition required.</p>	<p>Policy ID1 is targeted to ensure the timely provision of infrastructure necessary to support new development. At the site level, any planning permission may be subject to a Grampian planning condition, preventing occupation until any necessary upgrades have been made.</p>
<p>Thames Water</p> <ul style="list-style-type: none"> No infrastructure concerns regarding Water Supply capability. 	<p>Noted. This is contrary to the information submitted in 2016, which raised that there were water network capacity issues.</p>
<ul style="list-style-type: none"> The car park is well used, ideally located (near Upper High Street) and needed. 	<p>Requirement to retain as much car parking as possible</p>

A13 Kernal Court, Walnut Tree Close

Main Issue	Guildford Borough Council Response
<p>Representations from Prescribed Bodies and Selected Stakeholders</p>	
<p>Environment Agency</p> <ul style="list-style-type: none"> Although this site lies within flood zone 1, safe access may be questionable. It does not appear that this has been taken into account and no evidence that demonstrates that safe access is achievable has been provided. 	<p>This has been addressed in the update of the Level 2 SFRA.</p>
<p>National Trust</p> <ul style="list-style-type: none"> A more detailed set of design principles should be included with this and other site-specific policies. 	<p>This level of detail is considered too prescriptive.</p>
<p>Landowner</p> <ul style="list-style-type: none"> The Site should instead be allocated for residential (Use Class C3) and / student accommodation (Sui Generis). Student accommodation is considered to be an entirely appropriate use given the Site's proximity to the Railway Station, the Town Centre and in particular it's easy walking distance to the University Campus. The surrounding uses (including student accommodation adjacent to the Site), the nature of the forthcoming uses and the transition occurring in the area also underline its suitability for both residential and student accommodation. 	<p>Given the high housing need, the priority is to maximise opportunities for residential (C3) where appropriate and sustainable to do so.</p>

<p>Thames Water</p> <ul style="list-style-type: none"> Water network treatment capacity in this area is unlikely to be able to support the demand anticipated from this development. <p>Upgrades required – can take 18 months to 3 years to deliver.</p> <p>Detailed water supply strategy and planning condition required.</p>	<p>Policy ID1 is targeted to ensure the timely provision of infrastructure necessary to support new development. At the site level, any planning permission may be subject to a Grampian planning condition, preventing occupation until any necessary upgrades have been made.</p>
<p>Thames Water</p> <ul style="list-style-type: none"> Water treatment capacity in this area may be unable to support the demand anticipated from this development <p>Minor upgrades may be required – can take 18 months to 3 years to deliver.</p>	<p>Policy ID1 is targeted to ensure the timely provision of infrastructure necessary to support new development. At the site level, any planning permission may be subject to a Grampian planning condition, preventing occupation until any necessary upgrades have been made.</p>
<p>Representations on Specific Issues</p>	
<p><i>Loss of Kernal Court to residential:</i></p> <ul style="list-style-type: none"> Policy against loss of employment land is undertaken on a sequential test; i.e. those closest to the town are protected most. Kernal Court is on the border with the town centre and close to the major transport interchange of the railway station. There has been no attempt to market the site for employment purposes, nor to offer the premises to the tenant who wishes to remain. 	<p>The Local Plan is seeking to meet the needs for all types of development including housing, employment and retail. This site has been included from the issues and options stage as a development site.</p> <p>Policy E3: Maintaining employment capacity and improving employment floorspace set out the Council’s approach to protecting employment floorspace. The sites with the strongest protection are those designated as Strategic Employment Sites. One of these sites is the designated Guildford Town Centre Employment Core. However, Kernal Court lies outside this. The full list of sites is in Policy E1. The next level of protection is given to Locally Significant Employment Sites.</p>

A14 Wey Corner, Walnut Tree Close

Main Issue	Guildford Borough Council Response
<p>Representations from Prescribed Bodies and Selected Stakeholders</p>	
<p>Environment Agency</p> <ul style="list-style-type: none"> This site lies partly within flood zone 2 and 3, and note that safe access may be questionable. It does not appear that this has been taken into account and no evidence that demonstrates that safe access is achievable has been provided. 	<p>This site has been granted planning permission.</p>
<p>National Trust</p> <ul style="list-style-type: none"> The Local Plan should include proposals for a new riverside community park as identified in the Town Centre Masterplan. 	<p>The Local Plan includes sites that are deliverable over the plan period whereas the Guildford Town Centre and Hinterland Masterplan Report (Final draft report for consultation, October 2015) looked over a longer period and was more aspirational. The draft masterplan is neither a Development Plan Document nor a Supplementary Planning Document. The document has limited, if any, weight as a material consideration in planning terms.</p>

A15 Land at Guildford Cathedral

Main Issue	Guildford Borough Council Response
<p><i>Representations from Prescribed Bodies and Selected Stakeholders</i></p>	
<p>The Cathedral Church of the Holy Spirit, Guildford and Linden Homes</p> <ul style="list-style-type: none"> Capacity should be increased to 134 homes. <p>Allocation does not define or quantify any criteria for the determination of “<i>significance</i>” with regard to the preservation of existing trees and mature hedges. Terminology does not comply with NPPF.</p>	<p>Given then the constraints of the site, more than 100 homes is not considered to be appropriate for the site.</p> <p>The requirement has been changed to say “<i>A holistic approach to the landscaping of the site to include no unacceptable impact on existing trees or mature hedges</i>”.</p>
<p>Thames Water</p> <ul style="list-style-type: none"> Water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades required – can take 18 months to 3 years to deliver. Detailed water supply strategy and planning condition required. 	<p>Policy ID1 is targeted to ensure the timely provision of infrastructure necessary to support new development. At the site level, any planning permission may be subject to a Grampian planning condition, preventing occupation until any necessary upgrades have been made.</p>
<p><i>Representations on Specific Issues</i></p>	
<ul style="list-style-type: none"> Loss of Protected Open Space 	<p>The open space is categorised as Amenity Green Space. The proposed development would not result in a deficiency of Amenity Green Space within Onslow Ward and would allow for a significant improvement to the quality of the remaining open space.</p>
<ul style="list-style-type: none"> Adverse impact on Listed Building and views of Guildford Cathedral 	<p>Allocation reflects the listed status of the cathedral. The impact of any development on the cathedral or its setting will be assessed against national and local planning policy during the planning application process.</p>

A16 Land between Gill Avenue and Rosalind Franklin Close, Guildford

Main Issue	Guildford Borough Council Response
<p>Representations from Prescribed Bodies and Selected Stakeholders</p>	
<p>Thames Water</p> <ul style="list-style-type: none"> Water treatment and wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. <p>Upgrades required – can take 18 months to 3 years to deliver.</p> <p>Detailed drainage strategy and planning condition required.</p>	<p>Policy ID1 is targeted to ensure the timely provision of infrastructure necessary to support new development. At the site level, any planning permission may be subject to a Grampian planning condition, preventing occupation until any necessary upgrades have been made.</p>
<p>Thames Water</p> <ul style="list-style-type: none"> Water network capacity in this area is unlikely to be able to support the demand anticipated from this development. <p>Upgrades required – can take 18 months to 3 years to deliver.</p> <p>Detailed water supply strategy and planning condition required.</p>	<p>Policy ID1 is targeted to ensure the timely provision of infrastructure necessary to support new development. At the site level, any planning permission may be subject to a Grampian planning condition, preventing occupation until any necessary upgrades have been made.</p>

A17 Land south of Royal Surrey County Hospital, Rosalind Franklin Close, Guildford

Main Issues	Guildford Borough Council Response
<p><i>Representations on Specific Issues</i></p>	
<ul style="list-style-type: none"> • Site should be allocated for C3 housing/student accommodation 	<p>This site was inset from the Green Belt through the last Local Plan to support the operation of the Royal Surrey County Hospital (RSCH) and is identified in the current Local Plan 2003 under policy CF6 as land for hospital related development. This allocation includes medical facilities and staff accommodation. Existing staff and student accommodation on the adjacent site A16 is likely to be replaced by C3 homes, and we do know that staff such as student doctors and nurses struggle to find anywhere that they can afford to live locally and often have to commute significant distances to get to work. Retaining this land for hospital related development is considered to help support the future of the RSCH.</p>

A18 Land at Guildford College

Main Issue	Guildford Borough Council Response
<p><i>Representations from Prescribed Bodies and Selected Stakeholders</i></p>	
<p>Thames Water</p> <ul style="list-style-type: none"> Water network capacity in this area is unlikely to be able to support the demand anticipated from this development. <p>Upgrades required – can take 18 months to 3 years to deliver.</p> <p>Detailed water strategy and planning condition required.</p>	<p>Policy ID1 is targeted to ensure the timely provision of infrastructure necessary to support new development. At the site level, any planning permission may be subject to a Grampian planning condition, preventing occupation until any necessary upgrades have been made.</p>
<p>Site promoter</p> <ul style="list-style-type: none"> The site capacity should be amended to 527 bedspaces, consistent with the current planning application. 	<p>The allocation is approximate and is not intended to be a cap on further development should it be demonstrated following more detailed design work that additional homes are appropriate. Planning application 17/P/00509 referred to has been refused.</p>

A19 Land at Westway, off Aldershot Road, Guildford

No Main Issues.

A20 Former Pond Meadow School

No Main Issues.

A21 Aldershot Road allotments

Main Issue	Guildford Borough Council Response
<i>Representations on Specific Issues</i>	
<ul style="list-style-type: none">The main Allotment Site gate (often referred to as the "lower gate") must stay where it is with passage remaining for both vehicles and pedestrians.	The Council has a right of access through the site to the allotments (site allocation A21).

A22 Land north of Keens Lane, Guildford

Main Issue	Guildford Borough Council Response
<p><i>Representations from Prescribed Bodies and Selected Stakeholders</i></p>	
<p>Thames Water</p> <ul style="list-style-type: none"> Wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. <p>Upgrades required – can take 18 months to 3 years to deliver.</p> <p>Detailed drainage strategy and planning condition required.</p>	<p>Policy ID1 is targeted to ensure the timely provision of infrastructure necessary to support new development. At the site level, any planning permission may be subject to a Grampian planning condition, preventing occupation until any necessary upgrades have been made.</p>
<p>Site promoter</p> <ul style="list-style-type: none"> The opportunity for self-build plots is removed from the allocation (A22) as there is little evidence to support this requirement. 	<p>A requirement for a proportion of self-build plots on larger residential schemes has been added to Policy H1. The evidence for this is set out in more detail in the Housing Type Tenure and Mix Topic Paper.</p>

<p>Natural England</p> <ul style="list-style-type: none"> Part of this site is within 400m of the Thames Basin Heaths SPA. Whilst the policy makes reference to a care home being allocated within the 400m exclusion zone, it must be ensured that future residents will be too infirm and/ or have reduced mobility making it unlikely that they will be able to recreate on the SPA. <p>This policy also states that 150 residential units are proposed. It must be ensured that these units are located outside of the 400m exclusion zone and must provide an appropriate suite of mitigation to ensure that impacts upon the SPA are avoided.</p> <p>This site allocation is in very close proximity to the Whitmoor Common SSSI. Any direct or indirect impacts on this site should also be avoided or mitigated.</p>	<p>The policy states the care home will be located within 400m of the SPA subject to agreement with Natural England that it will have no impact on the SPA, and that occupants must be of only limited mobility such that they are unlikely to visit the SPA. This covers the issue raised.</p> <p>Direct and indirect impacts on the SPA are avoided and mitigated through the established approach based around SANG and SAMM, and through bespoke measures included in the policy.</p> <p>Policy P5 ensures that residential units will be built outside the 400m exclusion zone and that adequate and appropriate mitigation and avoidance measures will be required. Policy ID4 provides protection for Whitmoor Common.</p>
<p>Representations on Specific Issues</p>	
<p><i>Green Belt:</i></p> <ul style="list-style-type: none"> No exceptional circumstances for the site. <p>Green Belt should be protected.</p>	<p>The site was identified as a potential development area in the GBCS. The exceptional circumstances that justify removing it from the Green Belt are set out in the Housing Delivery topic paper.</p>
<ul style="list-style-type: none"> The PDA identified in the GBCS includes land to the north – this should be included within the allocation as it includes some land that is not within the 400m SPA buffer zone that would be suitable for development. 	<p>The current site boundary is considered to be a defensible Green Belt boundary. To add in the additional suitable land would require a much larger area to be removed from the Green Belt, most of which in 400m and with no development potential. We consider that the exceptional circumstances to do so do not exist.</p>

<ul style="list-style-type: none"> • Keens Lane would need to be widened / narrow rural roads: <ul style="list-style-type: none"> • Difficult to widen road due to common land • Road widening and roundabout improvements needed • Limited parking on lane. Many residents park on lane so make it difficult to pass • Unsuitable access / blind spots • Hard for two cars to pass each other • Road used by horse riders • Only pavement on one side of Keens Lane • Roads need considerable improvement before development can happen. 	<p>Access to the site is likely to be towards the eastern end of Keens Lane.</p> <p>It is considered that, at the planning application stage, an applicant will be able to demonstrate the safe operation and performance of Keens Lane, either as existing or improved as necessary.</p>
<ul style="list-style-type: none"> • Impact on SSSI/SPA. 	<p>The care home is proposed within the 400m buffer zone. A requirement has been added that this part of the allocation is subject to agreement with Natural England that it will have no impact on the SPA.</p>

A23 Land north of Salt Box Road

Main Issue	Guildford Borough Council Response
<p><i>Representations from Prescribed Bodies and Selected Stakeholders</i></p>	
<p>Natural England</p> <ul style="list-style-type: none"> This site is within 400m of the Thames Basin Heaths SPA and whilst allocated for a new burial ground, potential impacts on the SPA must still be considered especially given that a new car park and site access is proposed. We would expect measures to be put in place to ensure that the car park is not available to the general public. <p>The site and the car park must not link to the Public Rights of Way which lead towards the SPA.</p> <p>This site allocation is in very close proximity to the Whitmoor Common SSSI. Any direct or indirect impacts on this site should also be avoided or mitigated.</p>	<p>The site allocation includes the following requirements:</p> <ul style="list-style-type: none"> (1) A small off-street car park, strictly limited to genuine visitors to the burial ground (enforced) (3) Appropriate measures to discourage access from the burial ground or car park to the Thames Basin Heath SPA, and ensure there is no increase in recreational pressure within the SPA. <p>It is considered that this prevents impacts related to increased car parking within the vicinity of the SPA.</p> <p>Requirement (4) is for an application level Habitats Regulations Assessment, which will ensure any other direct or indirect impacts are identified and avoided or mitigated.</p>
<p><i>Representations on Specific Issues</i></p>	
<ul style="list-style-type: none"> Do not need to change Green Belt boundary to allow this development to take place <p>No exceptional circumstances to justify its removal</p>	<p>The boundary of the Green Belt would need to be altered in this location to remove this land from Green Belt, as burial grounds are an inappropriate use in the Green Belt.</p> <p>The need for further burial ground provision over the plan period has been considered, and potential sites outside of the Green Belt on which to deliver a new burial ground. No such suitable deliverable sites have been found. This constitutes the exceptional circumstances to remove this site from the Green Belt.</p> <p>The engineering operations required to construct a new road access</p>

	<p>to the site would be appropriate in the Green Belt, and the construction of appropriate facilities for cemeteries is also appropriate development in Green Belt, provided it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it.</p>
<p><i>It has not been proved beyond doubt that this site needs to be developed for a burial ground:</i></p> <ul style="list-style-type: none"> • There is enough burial space for all who want it (for 40 years) within the parish of Worplesdon at St. Mary' s Church, Brookwood Cemetery offers a burial 10 anybody who lived within 17 miles of the Cemetery and there is a natural burial site at Clandon (Mole Valley Council use this for their residents). There are crematoria in Guildford (to be refurbished as 72% of the people of this country opt for cremation) and Woking. Waverley Borough Council has offered Guildford residents burial space (enough for many years) at Eashing Cemetery which is approximately the same distance from the centre of Guildford as Guildford Crematorium. 	<p>Parish churchyards only provide for parishioners, not the wider population of Guildford, particularly the urban centre where there are no open churchyards (Holy trinity, St Johns, St Marys and The Mount are all full) with the exception of GBC's Stoke Cemetery which is nearing capacity. We bury 40-60 people per annum, it would be more, circa 60-100, if we had capacity and space for different faiths as some areas of our cemetery are full.</p> <p>The principle issue is catering for changing demographics, such as Muslim, Jewish and other faiths and practices who have limited or no availability along with providing space for C of e and Catholics. Approximately 80% of people are cremated in Guildford and Waverley leaving around 400-500 people per annum to be buried, we expect this to broadly remain the position with the exception of population growth which will push this figure to nearer 600 people per annum by 2050.</p> <p>To evidence need accurately is difficult, the diocese keep no records of availability in parish churchyards (which only caters for parished areas), however we have looked at demographics, our current availability. We are aware of the facilities in Eashing and the capacity there, however Waverley has a significant number of closed churchyards which this caters for and we would question if this is sustainable and accessible for the majority of Guildford's main urban population.</p>

A24 SARP

Main Issue	Guildford Borough Council Response
<p><i>Representations from Prescribed Bodies and Selected Stakeholders</i></p>	
<p>Surrey County Council</p> <ul style="list-style-type: none"> There is no direct or indirect reference to the Clay Lane link road under this policy, even the southern element, which uses a substantial part of this site. Even though SARP may not be reliant upon the full link road going through, the northern part of the allocated site does include the southern network of roads/ roundabouts forming the Phase 1 of the Clay Lane link road scheme. <p>Under “Requirements, it may be appropriate to refer to the need to provide permeability for pedestrians and cyclists into and from the development, especially from the existing urban fabric of Guildford, in accordance with the Sustainable Movement Corridor scheme objectives. This could be referenced in the context of a justification for the developer contribution referred to under the third bullet point.</p> <p>Surrey County Council’s education assessment finds that development of this site will require a new primary school. It is assumed that this is not referenced in Policy A24 because it is considered that Weyfield Primary School would be expanded to meet the need generated by the new development, given the proximity of the existing school to the site. This would be the preferred option, rather than building a new school which would compete with Weyfield. The school would need to expand by 1-2 forms of entry and a decision to take this option forward is dependent on the outcome of</p>	<p><u>Clay Lane link road</u> Requirement (1) refers to “Interventions will be required which address the potential highway performance issues which could otherwise result from the development, including on the A320 Woking Road.” This broad requirement allows the policy to be focused on the required outcomes necessary to deliver the site.</p> <p><u>Sustainable Movement Corridor</u> Reference added to requirement (3): “Developer to provide northern route section of Sustainable Movement Corridor on the site and make necessary and proportionate contribution to delivering the northern route section on the Local Road Network, <u>both having regard to the Sustainable Movement Corridor Supplementary Planning Document</u>”.</p> <p>Policy requirement now includes: (4) Appropriate financial contribution to enable expansion of Weyfield Primary Academy by additional 1FE – 2FE</p> <p>The allocation of this site in the Surrey Waste Plan is now referenced in the Key considerations and the allocation has been clarified further.</p>

<p>detailed feasibility studies that are being undertaken. If these find that it is not feasible to expand the school, additional land might be required to be allocated within the SARP area, in addition to a developer contribution. This reflects discussions between officers of our councils.</p> <p>In the table headed Description under Key considerations, the fact that some 11 ha of the site is allocated for waste management purposes in the Development Plan for the area (under Policy WD2 of the SWP) should be specifically acknowledged.</p> <p>Under allocation we would like to see clarification by stating: <i>New or enhanced waste management facilities including the following facilities:</i></p> <ul style="list-style-type: none"> • <i>Waste transfer station</i> • <i>Community recycling centre</i> • <i>Sewage treatment works</i> 	<p style="text-align: center; opacity: 0.5; font-size: 48px; font-weight: bold;">Draft</p>
<p>Highways England</p> <ul style="list-style-type: none"> • In its representation on the Draft Local Plan 2016 dated 18 July 2016, Highway England stated that ‘To date insufficient information has been provided to confirm whether or not the proposed development site is deliverable in transport terms on the SRN’ and accordingly recommended ‘that for Policy A24 to be Effective and “sound” in accordance with the NPPF’, new text to be appended to the text of the first bullet point in Requirements: ‘Planning permission will not be granted for this site until it has been demonstrated how the adverse impacts to the safe and efficient operation of the local and strategic road networks will be mitigated or if delivery of the site compromises the delivery of emerging improvements.’ 	<p>Following a meeting on 1 September 2016 to explain and clarify the approach taken to this matter in the Draft Local Plan 2016, Highways England, in a letter dated 5 October 2016, withdrew its previous representation of 18 July 2016 with respect to this policy as follows:</p> <p>‘We consider the policies provide a framework to how proposals can only be progressed if they meet the conditional requirements set out in the individual policies alongside requirements set out in I3. <u>Therefore we formally withdraw these representations.</u> However for further clarity we would recommend that some wording could be clearer particularly around the potential critical infrastructure requirements to enable delivery.’ (Underlining in original.)</p> <p>Policies in the Draft Local Plan 2017, including those to which amendments were made, manage the risks arising from the uncertainties regarding the delivery and timing of delivery of the key</p>

Highway England also 'suggested that the Infrastructure Schedule [in the Draft Local Plan] should be updated to match the Policy wording'. The policy wording in question is the first bullet point under Requirements which states that 'The Infrastructure Schedule in the latest Infrastructure Delivery Plan identifies the locations on the Local Highway Network and the Strategic Highway Network which could be expected to experience the most significant potential highway performance issues, in the absence of mitigating interventions, from development of this site', whereas the Infrastructure Schedule in the Draft Local Plan 2016 'does not specifically state the locations on either the Local Highway Network or the Strategic Highway Network directly affected by the site'.

infrastructure on which the delivery of the Plan depends, including the three RIS schemes. In this regard, see Policies ID1, ID3 (point (8)) and the site Policies A24 (requirement (2)), A25 (requirement (9)), A26 (requirement (9)) and A35 (requirement (5)).

Policy ID2, as amended by the changes in the Draft Local Plan 2017, requires that 'promoters of sites close to the A3 and M25 and strategic sites will need to take account of any emerging proposals by Highways England or any other licenced strategic highway authority appointed by the Secretary of State under the Infrastructure Act 2015.'

Policy ID1 at point (4) states that 'The key infrastructure on which the delivery of the Plan depends is set out in the Infrastructure Schedule at Appendix C, or any updates in the latest Guildford borough Infrastructure Delivery Plan.' The Reasoned Justification for this policy explains that the Guildford borough Infrastructure Delivery Plan, containing the latest Infrastructure Schedule, 'will be regularly reviewed as further detail becomes available, particularly regarding infrastructure needed to support development later in the plan period'. Policy ID3 at point (8) is similar and also relevant.

In addition, new development that will generate significant amounts of movement will, at the planning application stage, be supported by a Transport Statement or Transport Assessment, and subject to the policy tests in NPPF paragraph 32 and Policy ID3. Individual new developments may be required to provide mitigation measures additional to those in the Infrastructure Schedule.

So, the Submission Local Plan provides the planning policy framework to allow for the consideration of additional mitigation either through the development management process for planning applications, having regard particularly to Policy ID3 at point (7), or through any updates to the Infrastructure Schedule provided in the latest Guildford borough Infrastructure Delivery Plan, as provided for in Policy ID1 at point (4) and in Policy ID3 at point (8).

<p>Natural England</p> <ul style="list-style-type: none"> This site is adjacent to ancient woodland. Any direct or indirect impacts on this site should be avoided or mitigated. 	<p>The presence of ancient woodland adjacent to the site is listed as a key consideration. Appropriate mitigation will be considered as part of the planning application process.</p>
<p>National Trust</p> <ul style="list-style-type: none"> This Policy currently makes no reference to the fact that it is sited within the visual setting of the Navigations and the River Wey Conservation Area. 	<p>The Policy requirements now make reference to the visual setting of the Navigations and the River Wey Conservation Area.</p>
<p>Burpham Neighbourhood Forum</p> <ul style="list-style-type: none"> The allocation does not acknowledge that there is contamination on site. 	<p>There is known contamination on the site related to its former uses. The remediation of this will need to be addressed as part of the planning application process, in consultation with the Environment Agency.</p>
<p>Thames Water</p> <ul style="list-style-type: none"> <u>Water</u> <ul style="list-style-type: none"> Water treatment capacity in this area may be unable to support the demand anticipated from this development Significant upgrades may be required – can take 18 months to 3 years to deliver Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years <u>Wastewater</u> <ul style="list-style-type: none"> Wastewater treatment and network capacity in this area is unlikely to be able to support the demand anticipated from this development. Significant upgrades required – can take 18 months to 3 years to deliver Detailed drainage strategy and planning condition required. 	<p>Policy ID1 is targeted to ensure the timely provision of infrastructure necessary to support new development. At the site level, any planning permission may be subject to a Grampian planning condition, preventing occupation until any necessary upgrades have been made.</p>

Representations on Specific Issues	
<p><i>Deliverability:</i></p> <ul style="list-style-type: none"> Lack of evidence of support from Thames Water and Surrey County Council in relation to the proposals. <p>Insufficient land available to accommodate the mix of uses proposed without inappropriate densities on the site.</p> <p>Plan should not rely on the 1,000 homes from this site.</p> <p>Viability of the site given the funding of the infrastructure improvements and the timing of delivery is still to be confirmed, as is the cost of re-provision of existing on site facilities.</p>	<p>Thames Water is working with the Council regarding the redevelopment of the SARP site and the feasibility of relocating the Sewage Treatment Works to the land identified in the draft Local Plan.</p> <p>Thames Water supports the principle of the relocation of the Sewage Treatment Works. Detailed technical and feasibility assessments are being produced with the Council to support the next stages of design for the Sewage Treatment Works relocation.</p> <p>The Council is also continuing to work with Surrey County Council in respect of the waste uses.</p> <p>This site remains a Council priority and work is continuing to resolve issues and progress this site.</p>
<p><i>Heritage:</i></p> <ul style="list-style-type: none"> Close to important listed buildings. <p>Archaeological sites: ancient Watts Farm House and the site of the New Flowing River</p>	<p>Policy D3 seeks to conserve and enhance the historic environment. It also covers designated and undesignated heritage assets, which includes areas of archaeological potential.</p>
<p><i>Flooding:</i></p> <ul style="list-style-type: none"> Flooding occurs at present from the river, ditches and surface water. <p>The water table is high and drainage is poor.</p> <p>The issue of flooding is acknowledged by the Surrey Flood Forum and Guildford Surface Water Management Plan.</p>	<p>No comment from the Environment Agency in relation to flooding concerns. Policy A24 imposes a requirement on developer of the site to achieve a reduction in flood risk across the site and beyond it and to have regard to the Level 2 SFRA.</p>
<ul style="list-style-type: none"> Clay lane link road remains part of the plan despite part of the area being flood zone 3b. 	<p>The plan does not include reference to the Clay Lane link road. Should it be demonstrated that the road is essential transport infrastructure, it will be progressed through the planning application process and will need to meet the Exception Test.</p>

Transport:

- The Guildford Borough Proposed Submission Local Plan “June 2016”: Strategic Highway Assessment Report (Surrey CC, June 2016) (hereafter the SHAR 2016) forecasts that the A320 Woking Road and Moorfield Road would experience increased traffic congestion and have levels of service indicators which would be at least unstable or where traffic demand exceeds capacity.

Better access is required between the Slyfield, Jacobs Well and Burpham areas of Guildford and the A3.

The A320 Woking Road needs to be improved as it is already at capacity.

Need much better access onto Clay Lane at the northern end of Jacobs Well Road.

The necessary highways infrastructure required to serve this site necessitates the developer providing the on-site section of the Sustainable Movement Corridor and a proportionate contribution to the northern section of the Sustainable Movement Corridor along the Woking Road. The details of the Sustainable Movement Corridor are still to be confirmed and costed and could be frustrated by certain pinch points along the A320 Woking Road, notably where the road crosses the canal, the Bellfields roundabout and the roundabout serving the A3 north bound on-slip. To provide bus priority through these pinch points and through the A320/A25 junction will require significant widening and bridging.

The SHAR 2016 assessed the mitigation provided by key highway schemes from the programme of transport schemes that were considered necessary for the delivery of the Draft Local Plan 2016, including scheme LRN8 providing mitigation on the A320 Woking Road. See paragraph 3.2.3 in the SHAR 2016.

Schemes SRN2, SRN8, LRN8 and SMC5 will improve the highway network in the vicinity of the SARP site. In March 2017, the Government committed funding for scheme SRN8 which will be delivered by spring 2020.

New development that will generate significant amounts of movement will, at the planning application stage, be supported by a Transport Statement or Transport Assessment, and subject to the policy tests in NPPF paragraph 32 and Policy ID3. Individual new developments may be required to provide mitigation measures additional to those in the Infrastructure Schedule.

The Sustainable Movement Corridor is considered necessary to deliver the level of strategic planned growth in the Guildford urban area in a sustainable way. It is considered that the transport strategy will mitigate the principal transport impacts of proposed planning growth in the borough during the period to 2034.

Guildford Borough Council is undertaking a major study to design for the route sections of the Sustainable Movement Corridor. Where issues are identified solutions will need to be developed that allow the project to achieve the outcomes envisaged for the SMC and the needs of this site.

A25 Gosden Hill, Merrow Lane, Guildford

Main Issue	Guildford Borough Council response
<p>Representations from Prescribed Bodies and Selected Stakeholders</p>	
<p>Network Rail</p> <ul style="list-style-type: none"> Recommend that the allocation and requirements be amended to include provision of additional car parking spaces for rail users of the proposed new rail station at Guildford East (Merrow) in order to increase the passenger catchment and therefore viability of a station in this location. 	<p>Surrey County Council, the Local Highway Authority, and landowner of the site on the opposite side of the railway line, has indicated that significant car parking at the rail station or the creation of a parkway-type rail station would not be supported. Rather, Surrey County Council considers it important to provide sustainable links to the new station.</p> <p>The Submission Local Plan does not specify a level of car parking at the rail station.</p>
<p>Thames Water</p> <ul style="list-style-type: none"> Water Treatment Works upgrades may be required. <p>Wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development.</p> <p>Upgrades required – can take 18 months to 3 years to deliver.</p> <p>Detailed drainage strategy and planning condition required.</p>	<p>Policy ID1 is targeted to ensure the timely provision of infrastructure necessary to support new development. At the site level, any planning permission may be subject to a Grampian planning condition, preventing occupation until any necessary upgrades have been made.</p> <p>In relation to wastewater infrastructure, the site is reflected in the Infrastructure Schedule at Appendix C and Infrastructure Delivery Plan. Whilst the developer will be required to assess capacity, and provide detailed drainage strategies, this development may also need to be considered as part of Thames Water’s investment planning.</p>

<p>Thames Water</p> <ul style="list-style-type: none"> Significant infrastructure upgrades to Wastewater Treatment Works required – can take 18 months to 3 years to deliver. <p>Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years.</p>	<p>Policy ID1 is targeted to ensure the timely provision of infrastructure necessary to support new development. At the site level, any planning permission may be subject to a Grampian planning condition, preventing occupation until any necessary upgrades have been made.</p>
<p>Highways England</p> <ul style="list-style-type: none"> In its representation on the Draft Local Plan 2016 dated 18 July 2016, Highway England stated that the proposed A3/A3100 Burpham junction with relocated A3 southbound off-slip and new A3 southbound on-slip is ‘not considered Justified, Effective, or “sound” in line with the NPPF’, on the basis that the following have not been demonstrated: <ul style="list-style-type: none"> the need for the proposed access; that the new junction and associated infrastructure can be delivered safely without compromising traffic flow along the A3; and, the financial deliverability of the new junction. <p>In addition, Highways England stated that any safeguarding of land is a matter for the Local Planning Authority and that Highways England has no current plans or proposals that would require a 30-metre strip of land to be safeguarded.</p> <p>Recommended ‘that for Policy A25 to be justified, effective and “sound” in accordance with the NPPF’:</p> <ul style="list-style-type: none"> The deletion of first and second bullet points in Requirements. The addition of a new Requirement as follows: ‘Proposals must comply in all respects with design standards. Where there would be physical changes to the network, schemes must be submitted to road safety, environmental, and non-motorised user audit 	<p>Following a meeting on 1 September 2016 to explain and clarify the approach taken to this matter in the Draft Local Plan 2016, Highways England, in a letter dated 5 October 2016, withdrew its previous representation of 18 July 2016 with respect to this policy as follows:</p> <p>‘Highways England has no current plans for an improvement at this location (2nd bullet point in requirements, all moves junction), and we have no requirement to safeguard land for future needs in relation to the Roads Investment Strategy at the location, nor do we have any evidence that such an improvement is deliverable and in conformity with the Design Manual for Roads and Bridges. The policy should make clearer that the proposal for an all moves junction will be promoted by Guildford Borough Council/Surrey County Council and will need to be developed in partnership with Highways England. However, these are suggested amendments for clarification and are not considered a matter of soundness; <u>therefore we formally withdraw the representation.</u>’ (Underlining in original.)</p> <p>This requirement, which address the potential opportunity to provide an all movements junction, was changed in the Draft Local Plan 2017 (where it was numbered (2)) to remove reference to Highways England’s emerging A3 Guildford Road Investment Strategy (RIS) scheme. The requirement will guide proposals for new development on the site brought forward through the planning application process.</p>

<p>procedures, as well as any other assessment appropriate to the proposed development. The Design Manual for Roads and Bridges sets out details of the Secretary of State's requirements for access, design, and audit, with which proposals must conform.'</p> <ul style="list-style-type: none"> • New text to be appended to the text of the sixth bullet point in Requirements: 'Planning permission will not be granted for this site until it has been demonstrated how the adverse impacts to the safe and efficient operation of the local and strategic road networks will be mitigated or if delivery of the site compromises the delivery of emerging improvements.' 	
<p>Highways England</p> <ul style="list-style-type: none"> • Stated that: 'Highways England notes the proposed reduction in the number of dwellings and employment space to be delivered during the plan period. The removal of the definition of the size of the Park and Ride site from Policy A25 is also noted. <p>We support the proposed changes to the policy. We particularly note the transport package to facilitate growth at the site which includes having regard to the forthcoming Sustainable Movement Corridor Supplementary Planning Document which alongside other measures has the potential to reduce impacts on the A3.'</p>	<p>Noted.</p>
<p>Surrey County Council</p> <ul style="list-style-type: none"> • Add a new 'requirement' under the heading 'infrastructure' requiring the provision for extended/new bus services to provide seamless connectivity between the site, the existing eastern suburbs of Guildford, and the town centre (unless this will be adequately met by the Sustainable Movement Corridor.) 	<p><i>Changes made to the policy in the Draft Local Plan 2017:</i></p> <p>New requirement added, numbered (5), for a significant bus network to serve the site and key destinations including the existing eastern suburbs of Guildford and the town centre.</p> <p>New requirement added, numbered (6), to provide permeability for</p>

<p>It may be appropriate to refer to the need to provide permeability for pedestrians and cyclists into and from the development, especially from the existing urban fabric of Guildford.</p> <p>To ensure consistency throughout the document, change wording relating to primary schools to accord with the format of Policy A26 and Policy A35.</p> <p>In the 'Allocation', in the ninth bullet point relating to a secondary school, propose deletion of the words 'potentially as a through school' as the organisation of the school will be decided at a later stage.</p> <p>In the 'Requirements' under 'Infrastructure', consider that the secondary school site provision should be dealt with under a separate bullet point. Reference should be made under the new bullet point to the dual use of the playing fields which are essential for the school. It should be stated that ownership of the playing fields will be made over to the school and the dual use will be managed by the school according to an appropriate legal deed of covenant.</p>	<p>pedestrians and cyclists into and from the development, especially from the urban area of Guildford.</p> <p>Wording in relation to primary schools now consistent between allocations.</p> <p>Deleted reference to the potential for a through school.</p> <p>Policy requirement now includes: The associated off site playing fields must be dual use and secured through the planning application process.</p>
<p>Natural England</p> <ul style="list-style-type: none"> Includes an area of Registered Common Land. This is covered by the Commons Act 2006 and will have rights of access by the public which must be considered in the proposed use of the site and may also affect the capacity of the proposed SANG area. <p>This site is adjacent to and includes ancient woodland within the site. Any direct or indirect impacts on this site should be avoided or mitigated.</p>	<p>All land designations will need to be taken into account at the planning application stage. The common land covers a very small part of the site and is unlikely to have a significant effect on the deliverability of the site as a whole.</p> <p>The presence of ancient woodland is listed as a key consideration. Appropriate mitigation will be considered as part of the planning application process.</p>

Martin Grant Homes (Site promoter)

- 9th bullet should read; “A secondary school (D1) (four form entry, potentially as a through school; of which two forms are need for the housing on the site and the remainder for the wider area)” as a need of up to 6fe is unnecessary and not needed.

Will provide land and works/appropriate financial contributions to help deliver the physical infrastructure of the Park and Ride.

10th bullet should read; “Phased delivery of a park and ride facility, initially providing some 500 car parking spaces, with additional land reserved for potential expansion of the facility to up to 1,000 spaces.”

11th bullet should read “A new junction on to the A3 southbound carriageway to meet the needs of the development, which could also provide strategic benefits to the A3 and local routes, comprising the relocated A3 southbound off-slip, a new A3 southbound on-slip and connection to the local road network via a new roundabout to the A3100, with associated infrastructure on the A3100 corridor within Burpham.”

No need for 4-way junction or A3 tunnel / not justified / aspirational / no land safeguarded beyond A25

12th bullet deleted or should read: “A strip of land on the northern boundary of the site immediately adjacent to the A3 and to the east of the new junction should be safeguarded if, by the time of submitting a planning application for the development of Gosden Hill, Highways England has confirmed in writing that the delivery of a link eastwards to a currently aspirational scheme to provide strategic access to

Reference to a maximum of 6FE has been removed from the Infrastructure Schedule at Appendix C and the site allocation refers to a 4FE secondary school.

Amendment made to reference Park and Ride contributions.

Amendment made to Park and Ride reference to specify Land And Park and Ride facility of a sufficient scale as required by projected demand.

Reference to potential to provide all movements junction of the A3 with the A3100 retained.

Amendment made to 12th bullet point referencing land that could potentially be required for provision of a connector road to B2215 and A247.

Amendment to wording of Policy E1, paragraph (6).

<p>the A3 will form part of the Department for Transport’s “Road Investment Strategy”. Whilst not a specific requirement of the Gosden Hill development, this safeguarded strip, if required, would likely preclude built development up to 30m from the edge of the current A3 carriageway and would facilitate the delivery of a link eastwards to such a wider scheme.”</p> <p>Sustainable Movement Corridor is supported. 14th bullet should be amended to ensure clarity as to which sections of the Sustainable Movement Corridor are to be provided by Gosden Hill Farm and which sections will be delivered by Guildford Borough Council / Surrey County Council to facilitate modal change.</p> <p>Policy E1 needs to clarify that the strategic employment site designation relates only to employment land which is envisaged to be delivered alongside the A3 development access at Gosden Hill for B1a Office development.</p>	<p style="text-align: center; opacity: 0.5; font-size: 48px; font-weight: bold;">Draft</p>
<p>Martin Grant Homes (Site promoter)</p> <ul style="list-style-type: none"> Allocation (2): Object to requirement for Gypsy and Traveller pitches. <p>Allocation (9): Should read: A secondary school (D1) (<u>up to</u> four form entry, of which <u>approximately</u> two forms are needed for the housing on the site, and the remainder for the wider area).</p> <p>Requirement (1): Welcome the proposed clarification. Requirement (2): Should be deleted on the basis that it is not necessary to support the delivery of Gosden Hill Farm, is not supported by transport evidence base, and is included merely to meet an aspiration of Guildford Borough Council.</p> <p>Requirement (3): Committed to providing the land and</p>	<p>The requirement for traveller accommodation on sites of 500 dwellings or more will help ensure sufficient sites are provided to meet identified need.</p> <p>Allocation (9): The Infrastructure Schedule at Appendix C reflects a minimum of 4-form entry (4FE) secondary school at the site. Surrey County Council supports the infrastructure project as indicated in the Infrastructure Schedule. Considering this, and the provisions at Requirement (11), it is inappropriate to adjust the wording of the allocation as suggested.</p> <p>Requirement (2), as modified in the Draft Local Plan 2017, does not require that development proposals for the site deliver an all-movements junction of the A3 trunk road with the A3100 London Road, the B2215 London Road and the A247 Clandon Road. Rather it</p>

works/appropriate financial contributions to help deliver the physical infrastructure of the Park and Ride at Gosden Hill Farm. Also that it should be for Guildford Borough Council and Surrey County Council to operate the Park and Ride service and to ensure it will operate without public subsidy, on the basis that the successful operation of the Park and Ride will be dependent on Guildford Borough Council's policies relating to the operation of the existing Park and Ride sites and parking strategies within Guildford town centre, and that it is not fair or reasonable for the developer to be expected to subsidise a park and ride service in perpetuity. Should read: *Land and park and ride facility, of a sufficient scale as required by projected demand and in order to operate without public subsidy in perpetuity at the time of the submission of an application.*

Requirement (4): Will continue to engage positively to investigate improvements on eastern route section, as envisaged in the Sustainable Movement Corridor Supplementary Planning Document, to be funded by the development of Gosden Hill Farm, necessary to mitigate its impact.

Requirement (5): *Should read: A significant bus network to serve the site and key destinations including the existing eastern suburbs of Guildford and the town centre. Provide access to the public transport network, including the potential opportunities to serve the site via local and demand responsive bus services linking the site with key destinations including the existing suburbs of Guildford and the town centre.*

Requirement (7): Will continue to engage to identify the necessary land and reasonable financial contributions to support the delivery of the Guildford East (Marrow) railway

requires that this potential opportunity be considered. The Guildford Borough Proposed Submission Local Plan "June 2016": Strategic Highway Assessment Report (Surrey CC, June 2016) (hereafter the SHAR 2016) is a Plan-level strategic highway assessment. It is not intended to replace Transport Assessment of individual development proposals or definitively prescribe all highway mitigation that might be required for an individual development proposal.

With respect to requirement (3), the park and ride scheme at Gosden Hill Farm will only come forward with the development of the site. It is anticipated to form an element of the mitigation package for the site, to allow new vehicular trips generated by the development to use the 'headroom' on the highway networks provided by the interception of existing trips by the park and ride facility. Given that the operation of the park and ride facility will be an element of the mitigation package for the site, facilitating its delivery, it is considered that the developer should design the scheme such that it is able to operate without public subsidy.

Requirement (5), as modified in the Draft Local Plan 2017, responds to Surrey County Council's representation in 2016. Significant bus services are an important element to encourage people to travel sustainably to and from the site.

Requirement (11): It is considered appropriate to refer to Secondary educational need being re-assessed at the time a planning application is determined to ensure the decision reflects the latest position in terms of this need (re-assessment during preparation of the application that will be determined is implied). Furthermore, it is considered that it would be inappropriate for the Local Plan to pre-empt a requirement for re-assessment of need prior to construction. Should circumstances at the time have changed, there are means to modify agreements, if necessary.

The 'opportunities' section is not a list of requirements; rather it

station.

Requirement (11): Should read: *Secondary educational need will be re-assessed at the time a planning application is being prepared, during determination and prior to construction, ~~determined~~ at which time any recent new secondary school provision will be taken into account. The associated off site playing fields must be dual use and secured through the planning application process.*

Unclear if the 'Opportunities', added in the Draft Local Plan 2017, are regarded as 'desirable' or 'essential'. Criteria (1) and (2) appear to be requirements rather than opportunities, and appear to be unnecessary as duplicating other policies in the Draft Local Plan 2017.

Opportunities (3): Support this opportunity as it has the potential to provide greater permeability through the site and divert traffic from the B2234 and A3100, provide access to the railway station, the park and ride, primary and secondary schools and bring about wider strategic infrastructure improvements. The form of any such access road requires careful consideration to manage increased vehicular movements through the site and localised redistribution of trips. Should read: *Potential to provide a through route within the site to divert the B2234 to form a more direct link to the A3 at the improved junction an access into the site from the south, which could facilitate the diversion of the B2234 through the site to the improved A3 access, providing a more direct link than the B2234/A3100 for all modes. Any such link should be subject to further assessment prior to any application on the site.*

Opportunities (4): Committed to developing a sustainable urban extension.

provides a wider picture of the opportunities of the site.

The thrust of the site promoter's comments made with respect to the opportunity numbered (3) could be considered as part of a planning application process.

Representations on Specific Issues	
<p><i>Suitability / Scale:</i></p> <ul style="list-style-type: none"> • Unsustainable location for development. <p>The size of the development proposed is too large and disproportionate to the area.</p> <p>There is not enough physical space on site for everything that is proposed.</p>	<p>The justification for the spatial strategy and the allocation of this site are set out in more detail in the Housing Delivery topic paper.</p> <p>This strategic site is of a sufficient scale to be able to support a range of uses and associated infrastructure. This ensures the site is sustainable and contributes significantly towards meeting housing needs.</p> <p>The site was expanded towards the northeast. The increase in site size ensured the planned capacity of the site is deliverable at a density, which is appropriate for its location on the edge of the urban area. It also enabled sufficient land to deliver the scale of associated infrastructure, including the secondary school. There is the opportunity for a greater density towards the south of the site near the new local centre and rail station.</p>
<p><i>Landscape / Green Belt:</i></p> <ul style="list-style-type: none"> • Development will obscure views of Guildford town, which are important for setting of town. 	<p>The site allocation policy requires: (23) Sensitive design at site boundaries that has significant regard to the transition from urban to greenfield.</p> <p>Policy D4 requires new development to integrate well with the natural, built and historic environment. Masterplanning of the site will be considered in more detail through the planning application process.</p>
<ul style="list-style-type: none"> • No exceptional circumstances for the site. <p>Site meets the Green Belt purposes and should be protected.</p> <p>Will cause coalescence.</p>	<p>The site was identified as a potential development area in the GBCS. The exceptional circumstances that justify removing it from the Green Belt are set out in the Housing Delivery Topic Paper.</p>

Impact on air quality:

- Impact on air quality as a result of traffic generated by the new development.

AECOM undertook an Air Quality Review of Guildford Borough Proposed Submission Local Plan: Strategy and Sites “June 2017” (June 2017). This was a qualitative-risk based review, which considered the risk of significant air quality effects (in terms of annual mean concentrations of NO₂, PM₁₀ and PM_{2.5}) occurring with the implementation of the Draft Local Plan 2017. Consideration of risk was based on the size and nature of anticipated developments, their location, ambient air quality around potential developments and the locations of sensitive receptors to air quality around potential developments (including residential properties, schools and hospitals).

The findings suggest that the effect of the Draft Local Plan on annual mean NO₂ concentrations will be negligible and not a key constraint on development in the majority of the borough. Further, detailed modelling was recommended as being advisable around roads where notable changes in traffic flows are predicted, at locations in close proximity to sensitive receptors; albeit in each case it was considered unlikely that these development-related increases would lead to an exceedance of the air quality objective.

For particulate matter – both PM₁₀ and PM_{2.5} – negligible effects are anticipated at all sensitive receptors for air quality.

It was also recommended that the findings of the Air Quality Review be confirmed as part of the planning application processes for specific sites. Accordingly potential air quality issues have been added as a ‘key consideration’ for policies A24 Slyfield Area Regeneration Project, A25 Gosden Hill Farm, A26 Blackwell Farm and A29 Land to the south and east of Ash and Tongham.

The potential effect on European designated ecological sites such as the SPA is considered in detail in the Habitat Regulations Assessment (2017). This finds that the Local Plan will not result in likely significant effects upon the SPA as a result in changes in air quality,

	<p>notwithstanding the likely elevation in NOx concentrations along some road links (HRA, paragraph 10.4.14).</p> <p>The Council also manages local air quality through the Local Air Quality Management regime. At present, there are no Air Quality Management Areas (AQMAs) in the borough, although an AQMA covering a small area in the village of Compton may be designated shortly, subject to the outcome of a consultation with affected residents. If an AQMA is designated, the Council will put together a Local Air Quality Action Plan to improve the air quality in this area.</p>
<p><i>Impact of general infrastructure:</i></p> <ul style="list-style-type: none"> Inadequate electricity supply. <p>Pylons running through site – impact on health and safety.</p>	<p>The Infrastructure Delivery Plan identifies the need to upgrade the electricity supply infrastructure at Gosden Hill should a capacity assessment conclude it necessary.</p> <p>The National Grid cannot support policies or proposals in development plans, which rely on Electric and Magnetic Fields (EMF) and related health concerns as justification to control or direct development. Site level design would consider any appropriate planning and land use response to the location of the existing overhead lines (e.g. their location, which is planned below ground / addressing amenity and operational concerns).</p>
<p><i>Unacceptable adverse traffic impacts, including access to the A3:</i></p> <ul style="list-style-type: none"> The proposed two-way junction realised by scheme SRN4 would require vehicular trips from the Gosden Hill Farm site to the A3 northbound to route through Burpham/on Clay Lane, which is already congested/gridlocked. <p>Without a four-way junction with the A3, the site would have unacceptable impact on the Local Road Network. A four-way junction is needed to enable Clay Lane southbound and Gosden Hill Farm northbound traffic to reach the A3.</p> <p>Four-way junction is planned from 2021 but is out of kilter</p>	<p>Scheme SRN4 proposes a new A3/A3100 Burpham junction with a relocated A3 southbound off-slip and new A3 southbound on-slip. This scheme has been proposed by the promoters of the Gosden Hill Farm site. As well as serving the new development, the scheme will also allow existing residents and businesses in Burpham and Merrow to access the southbound A3 without having to drive through Guildford to access the A3 at the A322 interchange junction.</p> <p>The site policy retains the requirement, numbered (2) for any proposals for the development of the site to have regard to the potential opportunity to provide an all movements junction of the A3</p>

with an aspirational "Guildford Tunnel" which if realised will not be delivered until 2023 -2027; so there will be a period of intense traffic overload in Burpham.

In previous planning applications on the site (1981) a four-way junction at Potters Lane was proposed as a requirement.

The slip at Burpham would be too close to the slip at Burnt Common (Highways England require a separation of 2km, not 1.8km).

Linking of A3100 London Road, B2215 London and A247 Clandon Road would direct additional traffic through West Clandon and Send on the A247, a road which is narrow, winding and has safety issues including of large lorries mounting pavements.

Proposals will result in an increase in traffic and congestion which has already been exacerbated by Aldi in Burpham, particularly on the A3100 London Road, B2234 New Inn Lane, at the roundabout of the A3100 London Road and B2234 New Inn Lane, and on A3100 Clay Lane.

trunk road with the A3100 London Road, the B2215 London Road and A247 Clandon Road. This is a requirement for this to be considered through the development management process for planning applications.

Highways England is progressing the development of a major scheme for the improvement of the A3 in Guildford from the A320 to the A31 Hog's Back junction, as required by the Road Investment Strategy: for the 2015/16 – 2019/20 Road Period (Department for Transport, March 2015) (hereafter the RIS). The RIS identifies the A3 Guildford scheme as a scheme that will be developed during this Road Period (p.30) – in the period to 2020 – to enter construction in the next Road Period (p.46). This scheme is referenced as SRN2 in the Submission Local Plan's Infrastructure Schedule.

Highways England is actively developing the A3 Guildford scheme, and, in 2017, progressed the scheme from stage 0 'Strategy, shaping and prioritisation' to stage 1 'Option identification' of its project control framework.

Applying a cautious approach Highways England has advised that, if a scheme is approved with funding agreed, construction is unlikely to be start until 2024 at the earliest, with construction taking 2½ years.

In the early years of the new Local Plan, the delivery of planned development and the impact of new development traffic on the Strategic Road Network (SRN) is likely to be an important ongoing consideration as the existing SRN suffers from significant congestion during peak periods. Highways England's main concern is road safety and any proposal that adds significant levels of traffic to existing congested areas will need to be carefully assessed through the development management process for planning applications to ensure that it does not have a severe impact on road safety.

With this in mind, the delivery of planned development has been

	<p>proposed to ensure that the sites, and phasing of sites, that will be delivered in the first years of the new Local Plan, and therefore in the absence of the Department for Transport's RIS Road Period 1 and/or Road Period 2 schemes are located where traffic associated with them will have the least impact on the SRN's links and junctions where current congestion issues are the most acute.</p> <p>Policy ID1 requires, at point (3), that 'If the timely provision of infrastructure necessary to support new development cannot be secured, planning permission will be refused'. When determining planning applications, and attaching appropriate planning conditions and/or planning obligations, regard will be had to the delivery and timing of delivery of the key infrastructure, or otherwise alternative interventions which provide comparable mitigation'.</p> <p>Highways England is not progressing options for tunnel schemes for the improvement of the A3 Guildford, having considered their feasibility in 2016/17.</p> <p>Previous planning applications for the site have been reviewed. Two planning applications were submitted in 1981. The second application included all directions interchange with the A3 and a perimeter road linking the A246 and A3. Surrey County Council, the Local Highways Authority, specified amongst other requirements that the perimeter road was necessary. The all movements junction was not specified as a requirement for the development to proceed. Department of Transport recommended refusal on the grounds that the all movement junction was located too close to other A3 junctions. A planning inspector did consider it would bring relief to London Road and Clay Lane, however primarily his position was in respect to the benefit it would bring to the development of a wider orbital route. A wider orbital route is no longer under consideration by the Department for Transport, Highways England or Surrey County Council.</p> <p>The Department of Transport's Design Manual for Roads and Bridges</p>
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	<p>TD22/06 at paragraph 4.36 states that for Rural All-Purpose Roads the desirable minimum weaving length must be 1 kilometre. The separation between the slip at Burpham and the proposed slip at Burnt Common is in excess of this minimum distance.</p> <p>Scheme SRN4, which includes a new A3 southbound on-slip, will serve new traffic from the development as well as allowing existing residents and businesses in Burpham and Merrow to access the southbound A3 without having to drive through Guildford to access the A3 at the A322 interchange junction. It is not considered that this scheme will have an adverse impact on the performance of the A247.</p> <p>As a new development that will generate significant amounts of movement, it will, at the planning application stage, be supported by a Transport Assessment, and subject to the policy tests in NPPF paragraph 32 and Policy ID3. New developments may be required to provide mitigation measures additional to those in the Infrastructure Schedule.</p> <p>It is considered that, at the planning application stage, an applicant will be able to demonstrate the safe operation and performance of the Local Road Network, either as existing or improved as necessary.</p>
<p><i>Guildford East (Merrow) railway station:</i></p> <ul style="list-style-type: none"> • A new railway station in Merrow was rejected in 1984. <p>A new railway station will not promote sustainable transport, as commuters want fast trains to London.</p> <p>There is no commitment to a new railway station at Guildford East (Merrow) from Network Rail and there was no reference to a new railway station in the Wessex Route Study.</p> <p>If a new railway station relies on access via the Merrow Depot site, then the narrow local roads, including the access</p>	<p>Network Rail considers that, subject to further assessment and approval, the delivery of a new station at Guildford East (Merrow) is feasible and viable. The Wessex Route Study (Network Rail, August 2015) states that new stations were proposed by consultees including at Merrow (paragraph 2.7.5). FirstGroup MTR South Western Trains, the new operator of the South Western franchise, has publically committed to work with stakeholders to progress plans for both new rail stations proposed in the Submission Local Plan.</p> <p>Access, including vehicular access, to a new railway station at Guildford East (Merrow) from either side of the railway line is</p>

<p>road, and the railway bridge will not be able to accommodate the new traffic.</p> <p>Station should be accessed via Gosden Hill or located on Gosden Hill.</p> <p>The Gosden Hill Farm site should be conditional on delivery of the Guildford East (Merrow) railway station.</p>	<p>considered to be achievable. Further consideration will be given as part of the development management process for a planning application.</p> <p>If a new railway station was to be accessed by vehicles to the south of the railway line, then it is considered that the local roads, including the access road and the railway bridge, can be improved and/or managed as necessary in order to maintain their safe operation and performance.</p> <p>The requirement with respect to a new railway station has been changed in the Draft Local Plan 2017, numbered (7), to 'Land and necessary and proportionate contribution to delivering Guildford East (Merrow) railway station working with Network Rail and Surrey County Council as the land owner to the south of the railway line'.</p> <p>At the Local Plan-making stage, it is considered that it would not be appropriate to specify that the delivery of the Gosden Hill Farm site be conditional on the delivery of the Guildford East (Merrow) railway station, given the tests of planning conditions and obligations set out in the NPPF (paragraphs 206 and 204). Rather, the site promoter's transport strategy, including the role of a new rail station, will be developed in discussion with Network Rail, Highways England, Surrey County Council and Guildford Borough Council through the development management process for planning applications.</p>
<p><i>Tunnel:</i></p> <ul style="list-style-type: none"> The site is located on a potential location for a tunnel portal for an A3 tunnel. <p>Tunnelling of the A3 should be agreed before the Gosden Hill Farm is planned for development and/or land should be safeguarded.</p>	<p>Highways England is not progressing options for tunnel schemes for the improvement of the A3 Guildford, having considered their feasibility in 2016/17.</p>

<p><i>Delivery of site should be conditional on delivery of railway station:</i></p> <ul style="list-style-type: none"> • The Gosden Hill Farm site should be conditional on delivery of the Guildford East (Merrow) railway station. 	<p>The requirement with respect to a new railway station has been changed in the Draft Local Plan 2017, numbered (7), to 'Land and necessary and proportionate contribution to delivering Guildford East (Merrow) railway station working with Network Rail and Surrey County Council as the land owner to the south of the railway line'.</p> <p>At the Local Plan-making stage, it is considered that it would not be appropriate to specify that the delivery of the Gosden Hill Farm site be conditional on the delivery of the Guildford East (Merrow) railway station, given the tests of planning conditions and obligations set out in the NPPF (paragraphs 206 and 204). Rather, the site promoter's transport strategy, including the role of a new rail station, will be developed in discussion with Network Rail, Highways England, Surrey County Council and Guildford Borough Council through the development management process for planning applications.</p>
<p><i>Diversion of B2234 through Gosden Hill Farm site:</i></p> <ul style="list-style-type: none"> • There is no legal access from Gosden Hill Farm site to the B2234 Merrow Lane and land has not been set aside for such a link, therefore undermining Opportunity (3), as added in 2017 Plan. 	<p>This is an 'opportunity' rather than a 'requirement'.</p> <p>If a developer sought to realise this opportunity, there are legal procedures by which access across the Common Land might be achieved.</p>
<p><i>Flooding:</i></p> <ul style="list-style-type: none"> • Surface water flooding issues. 	<p>Site allocation policy includes a requirement for appropriate mitigation.</p>
<p><i>Environment:</i></p> <ul style="list-style-type: none"> • Loss of agricultural land. 	<p>Whilst the NPPF seeks to direct development towards areas of poorer agricultural quality, this does need to be balanced with other considerations. The SA assesses the impact of the spatial strategy on agricultural land (section 10.10).</p>

A26 Blackwell Farm

Main Issue	Guildford Borough Council Response
<p>Representations from Prescribed Bodies and Selected Stakeholders</p>	
<p>Surrey County Council</p> <ul style="list-style-type: none"> The reference to the A31/Down Place access as being the Primary Access should be changed in the column headed "Allocation", final bullet point, and in the column headed "Requirements," first and third bullet points. Further assessment work needs to be undertaken to determine the appropriate access strategy. Within a sustainable urban extension, we would want to encourage Guildford town bound movements to be by non-car modes. Whilst the Down Place access provides for vehicular access to the West, towards Winchester, southbound on the A3, to Portsmouth via Down Lane, and eastwards into Guildford town, we would expect A3 London/M25/ east Guildford/Woking traffic, to use the A3 Egerton Road access. <p>Further suggest that the Site Allocation plan on page 185 should include the land necessary to provide the access link to the east (i.e. into Egerton Road). According to the current plan, the site is isolated from the east, especially given that the Ancient Woodland provides a barrier between the site and the urban fabric of West Guildford.</p> <p>Under "Requirements," fourth bullet point, reference to the need to manage this through-link should also be included in the text.</p> <p>Under "Requirements," A bullet point should be considered</p>	<p>The requirement numbered (1) has been amended to remove the distinction between primary and secondary vehicular accesses.</p> <p>It is not considered necessary to include the land necessary to provide the access link to the east within the site allocation area. Instead this is a requirement within the policy.</p> <p>Control of the through link has been included in the requirement numbered (3).</p> <p>A new requirement numbered (5) has been added with respect to the provision of a significant bus network.</p> <p>A new requirement (6) has been added with respect to the provision of permeability for pedestrians and cyclists.</p>

<p>for inclusion under the heading, “Infrastructure,” requiring the provision for extended/new bus services to provide seamless connectivity between the site; the existing western suburbs of Guildford; the town centre and also any through journeys that can be provided in the future to the eastern fringes of the town. Whilst the provision of the Sustainable Movement Corridor might be considered sufficient, other bus services and routes into the development might also be needed.</p> <p>Also under “Requirements,” it might be appropriate to refer to the need to provide permeability for pedestrians and cyclists into and from the development, especially from the urban area of Guildford.</p>	
<ul style="list-style-type: none"> The school is required to meet the county council's forecasted future need, on the assumption that the development proposed in the Local Plan comes forward. We would like additionally to see it specified that the school is required to be located in the northern part of the site. This is considered to be the most sustainable location in accessibility terms and it would be in accordance with the amendment to SED3. 	<p>Proposed minor amendments to wording in Infrastructure Schedule at SED3 and Policy A26 to address locational concerns. The preferred, sustainable location is, however, proposed to be articulated in a manner that relates to accessibility from the existing urban area and by public transport, rather than indicating “northern part of the site”.</p>
<p>Highways England</p> <ul style="list-style-type: none"> In its representation on the Draft Local Plan 2016 dated 18 July 2016, Highway England stated that the proposed primary vehicular access via the existing or a realigned junction of the A31 and the Down Place access road and the through vehicular link is ‘not considered Justified, Effective, or “sound” in line with the NPPF’, on the basis that the following have not been demonstrated: <ul style="list-style-type: none"> the need for the proposed access, in line with the requirements of DfT Circular 02/2013; that the new junction can be delivered safely without compromising traffic flow along the A3; 	<p>Following a meeting on 1 September 2016 to explain and clarify the approach taken to this matter in the Draft Local Plan 2016, Highways England, in a letter dated 5 October 2016, withdrew its previous representation of 18 July 2016 with respect to this policy as follows:</p> <p>‘We consider the policies provide a framework to how proposals can only be progressed if they meet the conditional requirements set out in the individual policies alongside requirements set out in I3. <u>Therefore we formally withdraw these representations.</u> However for further clarity we would recommend that some wording could be clearer particularly around the potential critical infrastructure requirements to enable</p>

<ul style="list-style-type: none"> • the proposed ‘relief to the A31/A3 junction’; and, • the financial deliverability of the new junction. <p>[The representation erroneously refers to scheme LRN3 as ‘a new A3 junction’.]</p> <p>Recommended ‘that for Policy A26 to be Effective and “sound” in accordance with the NPPF’:</p> <ul style="list-style-type: none"> • The deletion of first, second, third and fourth bullet points in Requirements. • The addition of a new Requirement as follows: ‘Proposals must comply in all respects with design standards. Where there would be physical changes to the network, schemes must be submitted to road safety, environmental, and non-motorised user audit procedures, as well as any other assessment appropriate to the proposed development. The Design Manual for Roads and Bridges sets out details of the Secretary of State’s requirements for access, design, and audit, with which proposals must conform,’ • New text to be appended to the text of the seventh bullet point in Requirements: ‘Planning permission will not be granted for this site until it has been demonstrated how the adverse impacts to the safe and efficient operation of the local and strategic road networks will be mitigated or if delivery of the site compromises the delivery of emerging improvements.’ 	<p>delivery.’ (Underlining in original.)</p> <p>Policies in the Draft Local Plan 2017, including those to which amendments were made, manage the risks arising from the uncertainties regarding the delivery and timing of delivery of the key infrastructure on which the delivery of the Plan depends, including the three RIS schemes. In this regard, see Policies ID1, ID3 (point (8)) and the site Policies A24 (requirement (2)), A25 (requirement (9)), A26 (requirement (9)) and A35 (requirement (5)).</p>
<p>Highways England</p> <ul style="list-style-type: none"> • Stated that: ‘Highways England notes the proposed reduction in the number of dwellings to be delivered during the plan period. <p>Highways England also notes that it is proposed that a through vehicular link between the A31 Farnham Road and Egerton Road will now be controlled to provide a new route</p>	<p>Further evidence is to be provided in the study of the performance of A3 trunk road in Guildford borough to 2024 under development scenarios, the earliest date for the start of construction of the A3 Guildford scheme. This study assesses the impacts of mainline queuing resulting from blocking back of traffic exiting at diverge junctions in the peak periods, the operation of merging and diverging at junctions in the peak periods, and impact on peak spreading.</p>

<p>for employees, residents and emergency services. It is noted that this is now said to “reduce impact on the A31/A3 junction, in advance of the delivery of Highways England’s A3 Guildford scheme”. We are keen to work with GBC and/or the site promoter to understand the degree of impact reduction on the A31/A3 junction ahead of a potential A3 scheme. Further it is unclear at this stage what level of growth can be delivered in advance of a potential A3 improvement and the consequences for growth at the site if there is no A3 improvement.’</p>	<p>The implementation of the three Road Investment Strategy (RIS) schemes during the Plan period, alongside other critical infrastructure, is required in order to be able to accommodate future planned growth both outside and within the borough. Accordingly, Policy ID1 at points (4) and (5), as well other policies in the Submission Local Plan, require regard be had to the dependencies between planned development and key infrastructure schemes.</p> <p>Policies in the Draft Local Plan 2017 manage the risks arising from the uncertainties regarding the delivery and timing of delivery of the key infrastructure on which the delivery of the Plan depends, including the three Road Investment Strategy (RIS) schemes. See Policy ID1, particularly at points (4) and (5). Point (4) refers to the key infrastructure as being ‘set out in the Infrastructure Schedule at Appendix C, or any updates in the latest Guildford borough Infrastructure Schedule’. Policy ID3, at point (8), contains similar phrasing. Policy A26 at requirement (9) is relevant and uses phrasing similar to that in Policy ID1 at points (4) and (5).</p>
<p>Thames Water</p> <ul style="list-style-type: none"> • Water Treatment Works upgrades may be required <p>Significant infrastructure upgrades to Wastewater Treatment Works required – can take 18 months to 3 years to deliver. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years.</p> <p>Wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development.</p> <p>Upgrades required – can take 18 months to 3 years to deliver. Detailed drainage strategy and planning condition required.</p>	<p>Policy ID1 is targeted to ensure the timely provision of infrastructure necessary to support new development. At the site level, any planning permission may be subject to a Grampian planning condition, preventing occupation until any necessary upgrades have been made.</p> <p>In relation to wastewater infrastructure, the site is reflected in the Infrastructure Schedule at Appendix C and Infrastructure Delivery Plan. Whilst the developer will be required to assess capacity, and provide detailed drainage strategies, this development may also need to be considered as part of Thames Water’s investment planning.</p>

<p>Thames Water</p> <ul style="list-style-type: none"> Water network capacity in this area is unlikely to be able to support the demand anticipated from this development. <p>Strategic water supply infrastructure upgrades are likely to be required to ensure sufficient capacity is brought forward ahead of the development.</p>	<p>Policy ID1 is targeted to ensure the timely provision of infrastructure necessary to support new development. At the site level, any planning permission may be subject to a Grampian planning condition, preventing occupation until any necessary upgrades have been made.</p>
<p>University of Surrey (site promoter)</p> <ul style="list-style-type: none"> Policy should include: “The total of 1800 homes may come forward in the plan period if the market and infrastructure provision allows”. <p>The allocation boundary provides a narrow corridor for the access from the A31 - at this stage this should be less definitive given that the detailed plans for the access have yet to be drawn up. The plan should provide for flexibility in the alignment of the access road and the new junction. The plan should show a broad zone through which the access will pass, subject to detailed design.</p> <p>Content in principle to see a controlled access, but thought needs to be given to the nature of the controls being sought, and the mechanism. Without this, the policy may not be effective. The addition of a reference to a choice of vehicular access for new residents/occupiers needs to be considered in association with the ‘controlled’ access.</p> <p>The words ‘significant bus network’ and encompassing ‘existing western suburbs’ should be amended to ‘extension of existing bus services to serve the site and to link it to key destinations and the town centre’.</p> <p>In relation to the secondary school - the policy should state ‘The size of the school at this site will not exceed six forms of entry’.</p>	<p>The site allocation policy already makes provision for this. It states that a minimum of 1,500 will be delivered during the plan period. The 1,500 relates to assumptions on the most likely rate of delivery only and does not in any way preclude the earlier delivery of the remaining 300 where this is sustainable to do so.</p> <p>It is not necessary to allocate a wider corridor for the improved Down Place access road or a new adjacent parallel access road, as it is considered that an appropriate access road can be realised within the identified allocation boundary, and given that the access road will run through both AONB and AGLV landscape designations.</p> <p>The nature of the controls required for the controlled access can be determined through the planning application process and secured with appropriate planning conditions and/or obligations. There are various practical ways in which controlled vehicular links have been implemented.</p> <p>Requirement (5), as modified in the Draft Local Plan 2017, responds to Surrey County Council’s representation in 2016. Significant bus services are an important element to encourage people to travel sustainably to and from the site.</p> <p>With regard to the secondary school allocation, it is considered that the current wording “up to six form entry...” is clear and need not be amended.</p>

<p>Natural England</p> <ul style="list-style-type: none"> This site is within the setting of the Surrey Hills Area of Outstanding Natural Beauty. We advise the LPA to take into account the relevant Management Plan for the area and should seek the views of the AONB Partnership. Development proposals brought forward through the plan should avoid significant impacts on protected landscapes, including those outside the plan's area and early consideration should be given to the major development tests set out in paragraph 116 of the National Planning Policy Framework (NPPF). This site is adjacent to ancient woodland. Any direct or indirect impacts on this site should be avoided or mitigated. 	<p>Any development proposals would need to be consistent with Policy P1 and the NPPF in respect of the AONB. The presence of ancient woodland is listed as a key consideration. Appropriate mitigation will be considered as part of the planning application process.</p>
<p>Representations on Specific Issues</p>	
<p><i>Sustainability:</i></p> <ul style="list-style-type: none"> The site is divorced from the existing urban area which makes the development unsustainable. 	<p>The allocation requires permeability for pedestrians and cyclists into and from the development especially from the urban area of Guildford (requirement (6)), vehicular access from the site to Egerton Road (requirement (1)), the provision of the western route section of the Sustainable Movement Corridor (requirement (4)), a significant bus network connecting it to key destinations including the existing western suburbs of Guildford and the town centre (requirement (5)) and will be accessible to the new Guildford West (Park Barn) rail station.</p>
<p><i>Green Belt:</i></p> <ul style="list-style-type: none"> No exceptional circumstances for the site. <p>Site meets the Green Belt purposes and should be protected.</p>	<p>The site was identified as a potential development area in the GBCS. The exceptional circumstances that justify removing it from the Green Belt are set out in the Housing Delivery topic paper.</p>
<p><i>Viability:</i></p> <ul style="list-style-type: none"> Transport infrastructure costs for schemes LRN3, LRN4, 	<p>Scheme BT6 is a further scheme added in the Draft Local Plan 2017.</p>

<p>SMC1, NR2 and LRN5, of between £50-£60million to make the site acceptable are considered to be excessive in comparison to the development proposals and therefore make the site unviable and undeliverable and do not comply with paragraph 173 of the NPPF.</p>	<p>Schemes LRN3, LRN4, LRN5 (totalling £30-35m), plus an amount yet to be determined for scheme BT6 are the complete the responsibility of a developer of the Blackwell Farm site to fund, and, of this, the access road (LRN4 £20m) is, in part or whole, an element of the developer's site costs. The Blackwell Farm developer will be one of the contributors to schemes SMC1 and NR2 – which total £30m – either via CIL or Section 106 agreement.</p> <p>The Local Plan and CIL Viability Study (2016) took strategic site infrastructure costs into account in considering plan viability. As part of viability testing with respect to Blackwell Farm, transport infrastructure costs that were accounted for were estimated at £73m. The results of this testing did not provide an indication that this level of cost threatened the viability of the development of the site.</p>
<ul style="list-style-type: none"> The 2017 Plan introduces new infrastructure costs (BT6) and increases costs for other schemes (LRN5), including by shifting (more) responsibility for delivery to the developer (LRN3, LRN4, LRN5, SMC1) which are high and risk that proposed development will not be viable and deliverable, and may not comply with para 173 of NPPF. 	<p>See above response.</p>
<p><i>Inadequacy of proposed new signalised junction of A31 and Down Place access road:</i></p> <ul style="list-style-type: none"> There is insufficient space within existing public highway limits to accommodate the widening of the A31 through the A31/Down Place junction (to deliver scheme LRN3) and it will require third party land and it has not been demonstrated that this is possible to acquire. <p>Signalised junction likely to be over-capacity at peak periods.</p> <p>No Highways England approval has been obtained for widening of the A31 overbridge over A3 or the widening of bridge on the Down Place access road which crosses over</p>	<p>It is anticipated that scheme LRN3 will be realised within the highway boundary and/or within land controlled by the developer within the site boundary.</p> <p>It is considered that, at the planning application stage, an applicant will be able to demonstrate the safe operation and performance of the new junction and access road.</p> <p>A roundabout is not required.</p>

<p>the A31 to A3 slip road, as this bridge is not wide enough for vehicle, bus, pedestrian and cycle access.</p> <p>A roundabout would be required at A3/Down Place junction given the traffic flows. However, Guildford Borough Council ruled out a roundabout on landscape impact, traffic impact, construction impact on highway operation, increased cost, and because there is insufficient space on the existing A31 overbridge crossing A3 for a roundabout.</p>	
<p><i>Egerton Road access:</i></p> <ul style="list-style-type: none"> Inadequate highway network serving an Egerton Road access, specifically the A3 trunk road, Egerton Road, Gill Avenue, Egerton Road/Gill Avenue junction, Tesco roundabout, Cathedral roundabout, with existing peak time delays and significant queuing frequently occurring. <p>Potential for increase in accidents caused by additional queuing off the eastbound A3 carriageway.</p> <p>Length of on-slip road at University Interchange to the A3 eastbound carriageway is inadequate to allow drivers to find a suitable gap in traffic.</p> <p>Lack of precision of requirement "preferably via Gill Avenue" with alternative not specified.</p> <p>Tesco roundabout on Egerton Road is already highly congested and no progress demonstrated in preparation of scheme to improve Tesco roundabout</p> <p>The Guildford Borough Proposed Submission Local Plan "June 2016": Strategic Highway Assessment Report (Surrey CC, June 2016) states that 'there are some junctions that are proposed to be improved that show deterioration', and citing</p>	<p>Schemes SRN2, SRN7, LRN2 and LRN5 and SMC1 will improve the highway network in the vicinity of the Egerton Road access to the Blackwell Farm site. In March 2017, the Government committed funding for scheme SRN7 which will be delivered by spring 2020.</p> <p>New development that will generate significant amounts of movement will, at the planning application stage, be supported by a Transport Statement or Transport Assessment, and subject to the policy tests in NPPF paragraph 32 and Policy ID3. Individual new developments may be required to provide mitigation measures additional to those in the Infrastructure Schedule.</p> <p>Further evidence is to be provided in the study of the performance of A3 trunk road in Guildford borough to 2024 under development scenarios, the earliest date for the start of construction of the A3 Guildford scheme. This study assesses the impacts of mainline queuing resulting from blocking back of traffic exiting at diverge junctions in the peak periods, the operation of merging and diverging at junctions in the peak periods, and impact on peak spreading.</p> <p>There are potential alternative routes available to the site promoter to achieve vehicular access from the site to Egerton Road. A route 'via Gill Avenue' is preferred.</p>

the improvement of the Tesco roundabout (scheme LRN2) as an example, it states that 'although there is a proposal to improve it, the additional access to and from the Blackwell Farm development via Gill Avenue results in a significant increase in trips on this part of the network. This is, in turn, impacting on junctions for which there are no schemes proposed at the moment, highlighting where additional improvements may be necessary. An example of this is the Egerton Road/Gill Avenue junction adjacent to the Royal Surrey County Hospital.' Respondents further note that the Egerton Road/Gill Avenue junction serves the Royal Surrey County Hospital including emergency vehicles.

With respect to the forecast deterioration at the Tesco roundabout and consequent impact on adjacent junctions, the Guildford Borough Proposed Submission Local Plan "June 2016": Strategic Highway Assessment Report (Surrey CC, June 2016) represents a robust "worst case" in terms of transport demand and supply assumptions, as it does not assess and therefore does not account for the mitigation; including the potential for modal shift, and the new and improved sustainable transport choices provided by the rail, bus and active modes schemes included in the Draft Local Plan 2016 and makes no allowance for any internalisation of trips within the larger sites. Specifically, schemes SMC1 (Sustainable Movement Corridor: West) and NR2 (New rail station at Guildford West (Park Barn)) are not assessed. The potential mitigation provided by scheme LRN5 is also not assessed. As stated above, new development that will generate significant amounts of movement will, at the planning application stage, be supported by a Transport Statement or Transport Assessment, and subject to the policy tests in NPPF paragraph 32 and Policy ID3. Individual new developments may be required to provide mitigation measures additional to those in the Infrastructure Schedule.

Further to the above, emergency vehicles approaching from the west and bound for the Royal Surrey County Hospital will benefit from the Requirement – number (3), as amended in the Draft Local Plan 2017 – the that vehicular link through the Blackwell Farm site 'will be controlled' which will 'provide a new route for employees and emergency services to the Surrey Research Park, the University of Surrey's Manor Park campus and the Royal Surrey County Hospital, as well as a choice of vehicular access for the new residents/occupiers.'

<ul style="list-style-type: none"> • Significant additional traffic resulting from the addition of secondary school to allocation for Blackwell Farm site has not been accounted for/no changes to proposed capacity of the road network. 	<p>Blackwell Farm is a preferable location for a new secondary school in comparison with the former Policy A46 Land to the south of Normandy and north of Flexford site, in relation to both school place planning and sustainability perspectives.</p> <p>With the new secondary school delivered on the Blackwell Farm site, as opposed to the deleted Policy A46 site, it is expected that there will be an increase in the site's internalisation of trips with two of the six forms of entry at the school needed to serve the site itself.</p> <p>In addition, the Draft Local Plan 2017 includes scheme SED5 in the Infrastructure Schedule for the expansion of Ash Manor Secondary School by an additional one form of entry to provide spaces for children who will live around Ash and Tongham. The new secondary school on the Blackwell Farm site is therefore expected to provide only six forms of entry, as opposed to being a direct replacement for the formerly proposed new secondary school on the now deleted Policy A46 site which was expected to provide seven forms of entry.</p> <p>New developments that will generate significant amounts of movement will, at the planning application stage, be supported by a Transport Statement or Transport Assessment, and subject to the policy tests in NPPF paragraph 32 and Policy ID3. Individual new developments may be required to provide mitigation measures additional to those in the Infrastructure Schedule.</p>
<ul style="list-style-type: none"> • It is not clear how car drivers seeking to access the school would be able to through the controlled access. 	<p>The nature of the controls required for the controlled access can be determined through the planning application process and secured with appropriate planning conditions and/or obligations. There are various practical ways in which controlled vehicular links have been implemented.</p> <p>We have proposed a minor amendment with an addition to wording of Requirement (11) in Policy A26 that 'The location of a secondary school should be carefully considered so as to ensure convenient</p>

	<p>access via public transport and from the urban area of Guildford.’ Along the same lines, we have proposed a minor amendment to scheme SED3 in the Infrastructure Schedule, with the deletion of the sentence ‘To be located to the north of the site’ and its replacement with ‘To be located so as to ensure convenient access via public transport and from the urban area of Guildford.’ These changes will help maximise the use of the sustainable modes of transport to access the school.</p>
<ul style="list-style-type: none"> The University of Surrey has exceeded the 5% permitted increase in development traffic level for the enlarged facilities operated by the University at Stag Hill and Manor Park on top of the 1999 base traffic level, contrary to an obligation in a 2004 Section 106 agreement. 	<p>The Blackwell Farm site is not subject to this 2004 Section 106 obligation.</p> <p>The 2014 traffic survey, provided on behalf of the University of Surrey to Guildford Borough Council, is the most recent traffic survey which uses the methodology as established in the Section 106 agreement. This identifies a development traffic level for the enlarged facilities operated by the University at Stag Hill and Manor Park of 4.9% on top of the 1999 base traffic level.</p> <p>Guildford Borough Council and Surrey County Council are working with the University of Surrey to ensure a continuation of the commitment to monitor over future years.</p>
<p><i>Accidents likely to increase with more traffic turning around on A31:</i></p> <ul style="list-style-type: none"> Traffic travelling southbound from the A3 north to the site’s primary access at the Down Place access road would be likely to increase the volumes of traffic manoeuvring through two known existing accident cluster sites on the A31, namely by using the U-turn facility opposite East Flexford Lane on the A31 or turning at the B3000 Puttenham Hill/A31 Hog’s Back junction (Puttenham). 	<p>The A31 Hog’s Back Gap at East Flexford Lane has been permanently closed to all vehicular traffic, following the decision of Surrey CC’s Local Committee (Guildford) on 29 September 2016.</p> <p>The Local Plan, in the Infrastructure Schedule at Appendix C, includes scheme LRN17 B3000 Puttenham Hill/A31 Hog’s Back junction (Puttenham) improvement scheme.</p>

Through vehicular link through site via access between A31 Farnham Road and Egerton Road:

- Driver behaviour has not been thoroughly considered relating to providing LRN4 'through vehicular link' through the site and the effect of the potential attractiveness that this route may have over the A3 and A31 junctions has not been adequately considered and assessed.

Measures to discourage through route not feasible namely a winding route through the site or an Automatic Number Plate Recognition (ANPR) system.

Contrary to Paragraph 158 of the NPPF including to understand traffic impacts of trips attracted to new rail station at Guildford West (Park Barn).

The requirement with respect to the through vehicular link (scheme LRN4) has been amended to state that it will be controlled. The requirement, numbered (4), is now that '(1) A through vehicular link which will be controlled is required via the above accesses between the A31 Farnham Road and Egerton Road to provide a new route for employees and emergency services to the Surrey Research Park, the University of Surrey's Manor Park campus and the Royal Surrey County Hospital, as well as a choice of vehicular access for the new residents/occupiers. This will reduce impact on the A31/A3 junction, in advance of the delivery of Highways England's A3 Guildford scheme'.

There are various practical ways in which controlled vehicular links have been implemented. ANPR is an established method for restricting vehicular traffic.

The Guildford Borough Proposed Submission Local Plan "June 2016": Strategic Highway Assessment Report (Surrey CC, June 2016) (hereafter the SHAR 2016) assessed the mitigation provided by key highway schemes from the programme of transport schemes that were considered necessary for the delivery of the Draft Local Plan 2016, including schemes LRN3 and LRN4. See paragraph 3.2.3 in the SHAR 2016.

It is expected that, borough-wide, modal shift of car to rail trips will significantly outweigh new vehicle trips to access the new rail station at Guildford West (Park Barn). The station is not planned to be a 'parkway' station so sustainable transport options for travel to and from the site will be the priority. The new station will serve the existing community, the employment and educational destinations in the area, including the University of Surrey's Manor Park campus, the Surrey Research Park and the Royal Surrey County Hospital, as well as serving the Blackwell Farm site.

The control of the through route has been clarified in the requirements section of the Policy.

<p><i>Through vehicular link through site via access between A31 Farnham Road and Egerton Road:</i></p> <ul style="list-style-type: none"> Control would require the use of an Automatic Number Plate Recognition (ANPR) system coupled with a permit system for a private section of road, which would not be reliable or effective, with outstanding question regarding the ongoing operating costs, and system would be abandoned with resulting disadvantages of a link road to wider network realised. <p>Guildford Borough Council and Surrey County Council have not identified a suitable access route to link Blackwell Farm to Egerton Road.</p>	<p>There are various practical ways in which controlled vehicular links have been implemented. ANPR is an established method for restricting vehicular traffic.</p> <p>There are potential alternative routes available to the site promoter to achieve vehicular access from the site to Egerton Road. A route 'via Gill Avenue' is preferred.</p>
<ul style="list-style-type: none"> Uncertainty in relation to the delivery of the A3 improvements through Guildford upon which this site depends 	<p>The delivery of the scale of development contained within the Draft Local Plan is contingent on the delivery of the necessary infrastructure. This crucially includes the major scheme for the improvement of the A3 Guildford, which is referenced as scheme SRN2 in the Infrastructure Schedule at Appendix C of the Draft Local Plan. Policy A26 Blackwell Farm includes policy test to this effect as the requirement numbered 9 and a similar policy test is paragraph 5 of policy ID1 Infrastructure and Delivery.</p>
<p><i>Sustainable Movement Corridor:</i></p> <ul style="list-style-type: none"> Lack of detail on Supplementary Planning Document. <p>Egerton Road underpass – which is assumed to have four lanes, two in each direction, at present – will not have the capacity to be reduced to three lanes plus a bus lane with tidal flow routing. Unlikely to be effective enough to resolve access issues.</p> <p>Bus services no longer viable.</p>	<p>Paragraph 153 of the NPPF states that '<i>additional development plan documents should only be used where clearly justified</i>' and that '<i>Supplementary planning documents should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development</i>'. The Council consider that the Sustainable Movement Corridor Supplementary Planning Document will both 'help applicants make successful applications' and 'aid infrastructure delivery'.</p> <p>The Enterprise M3 Local Enterprise Partnership has made a</p>

	<p>provisional allocation of £12.5 million for various projects in Guildford borough, including around £3.9 million for elements of the Sustainable Movement Corridor: West route section (scheme reference: SMC1). It is proposed that Guildford Borough Council will also make a contribution. Surrey County Council and Guildford Borough Council consulted on proposals for elements of SMC1 in September–October 2017 to inform the decision as to which elements should be delivered first, with the rest of SMC1 delivered in the future when further funding is secured. A business case for those elements to be funded by the LEP and the Council is to be submitted to the LEP in November 2017.</p> <p>The consultation included proposals for the A3 Egerton Road underbridge.</p> <p>Operators predominantly provide bus services in the town of Guildford on a commercial basis.</p>
<p><i>Impact on views/AONB:</i></p> <ul style="list-style-type: none"> • Important to the setting of the Hog’s Back ridge and Guildford. <p>Impact of street lighting and earth works associated with new access road would open up public views of development from A31 / harm AONB.</p> <p>Harm existing public views.</p> <p>Acknowledged to be important in providing the setting to Guildford and an important transitional landscape.</p> <p>Contrary to Landscape Character Assessment (LCA).</p>	<p>The site area has been reduced from that identified in the GBCS and Draft Local Plan (2014). The land that no longer forms part of the allocation is the land directly adjacent to the Hogs Back which is considered more sensitive in landscape terms.</p> <p>The design of the new junction and improved Down Place access road will need to be sensitively designed to ensure that impacts on views are minimised this will include any necessary street lighting.</p> <p>The LCA does not preclude development. Instead it helps shape future development by indicating sensitivities that should be considered.</p>

<p><i>AONB boundary review:</i></p> <ul style="list-style-type: none"> Blackwell Farm was not considered in HDA study. <p>Independent landscape character assessment recommends it is included in AONB.</p> <p>Site should be protected until boundary review has been concluded.</p>	<p>Blackwell Farm was included within the Natural Beauty Evaluation Study Area but was not considered to meet the criteria to be identified as a candidate area.</p> <p>The HDA study was endorsed by the AONB Board and is the evidence by which the Board formally requested NE for a boundary review. The evidence was prepared by a Chartered independent landscape consultant. Their findings are consistent with previous studies that have been carried out in relation to this matter. The final decision regarding the AONB boundary will be made by NE.</p> <p>NE has clarified that even candidate areas should be given no additional planning status or weight. It would therefore not be appropriate to give this land, which has not been identified as a candidate area, additional protection.</p>
<ul style="list-style-type: none"> Loss of good quality agricultural land. 	<p>Whilst the NPPF seeks to direct development towards areas of poorer agricultural quality, this does need to be balanced with other considerations. The SA assesses the impact of the spatial strategy on agricultural land (section 10.10).</p>
<p><i>Impact on the ancient woodland:</i></p> <ul style="list-style-type: none"> Proximity to Strawberry Grove, Dean Bottom, Manor Copse and a strip of Ancient woodland at Wildfield Copse. <p>Proposed access will cut through ancient woodland.</p>	<p>Ancient woodland is protected under the NPPF unless it can be demonstrated that the need for, and the benefits of, the development clearly outweigh the loss. This will be a key consideration in the design of the development.</p> <p>The illustrative masterplan framework provides a 15-metre buffer alongside it. The through road link to the existing Surrey Research Park, to enable access Egerton Road via Gill Avenue, will be designed to minimise potential impacts on the ancient woodland. The ancient woodland will be used to provide Suitable Alternative Natural Greenspace, and the provision and management of this is compatible with, and will take account of, the ancient woodland characteristics of the woodland.</p>

Impact on air quality:

- Blackwell Farm development and A3 Guildford widening scheme, in combination, would substantially raise the Nitrogen Dioxide levels in Compton on the B3000 further above legal limits.

Evidence presented in the Air Quality Review of Guildford Borough Proposed Submission Local Plan: Strategy and Sites “June 2017” (GBC, June 2017) with respect to the risk of significant air quality effects in Compton are erroneous.

AECOM undertook an Air Quality Review of the Draft Local Plan (June 2017). This qualitative risk based review considered the risk of significant air quality effects – in terms of annual mean concentrations of NO₂, PM₁₀ and PM_{2.5} – occurring with the implementation of the Draft Local Plan based on the size and nature of anticipated developments, their location, ambient air quality around potential developments and the locations of sensitive receptors – including residential properties, schools and hospitals – to air quality around potential developments.

For NO₂, the findings suggest that the effect of the Draft Local Plan on annual mean NO₂ concentrations will be negligible and not a key constraint on development in the majority of the borough. Further detailed modelling was recommended as being advisable around roads where notable changes in traffic flows are predicted, at locations in close proximity to sensitive receptors, albeit in each case it was considered unlikely that these development-related increases would lead to an exceedance of the air quality objective.

For particulate matter – both PM₁₀ and PM_{2.5} – negligible effects are anticipated at all sensitive receptors for air quality. It was also recommended that the findings of the Air Quality Review be confirmed as part of the planning application processes for specific sites, and accordingly potential air quality issues has been added as a ‘key consideration’ for policies A24 Slyfield Area Regeneration Project, A25 Gosden Hill Farm, A26 Blackwell Farm and A29 Land to the south and east of Ash and Tongham.

The potential effect on European designated ecological sites such as the SPA is considered in detail within the Habitat Regulations Assessment (2017).

The Council also manages local air quality through the Local Air Quality Management regime. At present, there are no Air Quality

	<p>Management Areas (AQMA) in the borough, although an AQMA covering a small area in the village of Compton may be designated shortly, subject to the outcome of a consultation with affected residents. If an AQMA is designated, the Council will put together a Local Air Quality Action Plan to improve the air quality in this area.</p>
<p><i>Impact on biodiversity:</i></p> <ul style="list-style-type: none"> • Insufficient protection applied to the BOA in this area. <p>Important part of ecological network.</p>	<p>Policy ID4 requires that where development proposals fall within or adjacent to a BOA, biodiversity measures should support that BOA's objectives.</p>

A27 Warren Farm, White Lane, Ash Green

Main Issue	Guildford Borough Council Response
<p>Representations from Prescribed Bodies and Selected Stakeholders</p>	
<p>Thames Water</p> <ul style="list-style-type: none"> Wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. <p>Upgrades required – can take 18 months to 3 years to deliver.</p> <p>Detailed drainage strategy and planning condition required.</p>	<p>Policy ID1 is targeted to ensure the timely provision of infrastructure necessary to support new development. At the site level, any planning permission may be subject to a Grampian planning condition, preventing occupation until any necessary upgrades have been made.</p> <p>This site has extant planning permission.</p>
<p>Natural England</p> <ul style="list-style-type: none"> This site is within close proximity to the Surrey Hills Area of Outstanding Natural Beauty. We advise the LPA to take into account the relevant Management Plan for the area and should seek the views of the AONB Partnership. Development proposals brought forward through the plan should avoid significant impacts on protected landscapes, including those outside the plan’s area and early consideration should be given to the major development tests set out in paragraph 116 of the National Planning Policy Framework (NPPF). <p>This site is adjacent to ancient woodland. Any direct or indirect impacts on this site should be avoided or mitigated.</p>	<p>Any development proposals would need to be consistent with Policy P1 and the NPPF in respect of the AONB. The presence of ancient woodland is listed as a key consideration. Appropriate mitigation will be considered as part of the planning application process.</p> <p>This site has extant planning permission.</p>

A28 Land to the east of White Lane, Ash Green

Main Issue	Guildford Borough Council Response
<p>Representations from Prescribed Bodies and Selected Stakeholders</p>	
<p>Thames Water</p> <ul style="list-style-type: none"> Wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. <p>Upgrades required – can take 18 months to 3 years to deliver.</p> <p>Detailed drainage strategy and planning condition required.</p> <p>There is history of hydraulic flooding in the vicinity of this site.</p>	<p>Policy ID1 is targeted to ensure the timely provision of infrastructure necessary to support new development. At the site level, any planning permission may be subject to a Grampian planning condition, preventing occupation until any necessary upgrades have been made.</p>
<p>Site promoter</p> <ul style="list-style-type: none"> Site should be referred to as Land East of White Lane, Ash. This would reflect the Proposals Map designation which shows the site within the defined urban area <p>The site area should be increased to include additional land to the south, which may be required to facilitate access and visibility.</p> <p>Suitable for residential use, however, the site could be suitable for a C2 care village or other specialist retirement housing use.</p>	<p>The site name was changed to refer to Ash. However, this land does form part of Ash Green village and the site name should reflect this, irrespective of whether it forms part of the ash and Tongham urban area.</p> <p>A minor modification is proposed that amends the site name to refer to Ash Green rather than Ash.</p> <p>The site area was increased to ensure delivery. This is discussed in more detail in the green Belt and Countryside topic paper.</p> <p>An opportunity was added to refer to the potential to provide accommodation or older people.</p>

<p>Site promoter</p> <ul style="list-style-type: none"> The site should be extended further still to include land to the east which could be used for open space. 	<p>The current site boundary is considered to be appropriate as it is defined by the proposed new Green Belt which are defensible. Open space may still be considered appropriate in the Green Belt.</p>
<ul style="list-style-type: none"> The site forms part of Ash Green and the site allocation title should reflect this. 	<p>Agreed. A minor modification is proposed that amends the site allocation title to read “Ash Green”.</p>
<ul style="list-style-type: none"> The expanded site area includes area of ancient woodland and TPOs. 	<p>The impact of development on trees and ancient woodland is listed as a key consideration. Appropriate mitigation will be considered as part of the planning application process.</p>

A29 Land to the south and east of Ash and Tongham

A30 Land for new road bridge, Ash station (previous allocation, now part of A29)

Main Issue	Guildford Borough Council Response
<p>Representations from Prescribed Bodies and Selected Stakeholders</p>	
<p>Surrey County Council</p> <ul style="list-style-type: none"> Under “Requirements,” given the volume of potential new homes, an additional bullet should be included which refers to the existing substandard junction of White Lane with A31 Hogs Back needing to be either improved or closed. Also, the current gap in the central reservation which requires traffic turning into Ash Green from the East to cross the eastbound A31 traffic is inappropriate for any material increase in traffic. 	<p>The Infrastructure Schedule at Appendix C includes scheme LRN16 – A31 Hog’s Back (Tongham to Puttenham) road safety scheme. This is a key infrastructure requirement on which the delivery of the plan depends. The junction of White Lane with the A31 Hog’s Back will be reviewed in the development of this scheme.</p>
<p>Rushmoor Borough Council</p> <ul style="list-style-type: none"> Supportive of the planning policy framework and detailed infrastructure projects as they relate to the road network, subject to certainty regarding the delivery of these improvements as part of the overall package of implementation of development in and around Ash, Ash Vale and Tongham. <p>However, in the absence of the implementation of the full suite of transport policies and proposals to support the quantum of development set out in the Local Plan, this would potentially result in negative cross boundary transport impacts, the residual cumulative impacts of which would be severe.</p>	<p>The Infrastructure Schedule at Appendix C sets out the key infrastructure requirements on which the delivery of the plan depends. Policy ID1 and ID3 are relevant.</p> <p>The Council is progressing the development of various of these schemes in the Ash and Tongham area working with other parties including Surrey County Council, Network Rail, neighbouring authorities and developers.</p> <p>The Policy requirements have been strengthened with respect to the delivery of the key infrastructure requirements on which the delivery of the Plan depends in the Draft Local Plan 2017:</p> <ul style="list-style-type: none"> - Policy ID1 Infrastructure and delivery was amended to require that ‘If the timely provision of infrastructure necessary to support new

	<p>development cannot be secured, planning permission will be refused' – see paragraph (3).</p> <ul style="list-style-type: none"> - Policy ID3 Sustainable transport for new developments was amended to require that 'Planning applications for new development will have regard to the Infrastructure Schedule at Appendix C which sets out the key infrastructure requirements on which the delivery of the Plan depends, or any updates in the latest Guildford borough Infrastructure Delivery Plan' – paragraph (8).
<p>Waverley Borough Council</p> <ul style="list-style-type: none"> • Important for any impacts from this allocation, including impacts on the Thames Basin Heaths SPA, to be addressed. 	<p>Impacts on the SPA are dealt with through Policy P5. Other environmental impacts are dealt with through Policy ID4.</p>
<p>Thames Water</p> <ul style="list-style-type: none"> • Wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development <p>Upgrades required – can take 18 months to 3 years to deliver.</p> <p>Detailed drainage strategy and planning condition required.</p>	<p>Policy ID1 is targeted to ensure the timely provision of infrastructure necessary to support new development. At the site level, any planning permission may be subject to a Grampian planning condition, preventing occupation until any necessary upgrades have been made.</p>
<p>Natural England</p> <ul style="list-style-type: none"> • This site is in very close proximity to the Thames Basin Heaths SPA and therefore must provide an appropriate suite of mitigation to ensure that impacts upon the site are avoided. This is likely to include provision of SANG above the minimum standard of 8 ha per 1,000 persons. <p>This site allocation is in very close proximity to Thursley, Ash, Pirbright and Chobham SAC and Whitmoor Common SSSI. Any direct or indirect impacts on this site should also be avoided or mitigated.</p>	<p>Policy P5 requires provision of appropriate measures to avoid and mitigate impacts on all SPA sites and refers to the standard of 8 ha per 1,000 people as a minimum. The appropriate level of SANG provision can be addressed at the planning application stage. The Infrastructure Delivery Plan indicates that there will be spare SANG capacity available in the west of the borough.</p> <p>Policy ID4 provides protection for SACs.</p>

Representations on Specific Issues	
<ul style="list-style-type: none"> The capacity of the site should be maximised and is greater than the allocation. The allocation should be increased or specify that it is a minimum. 	<p>The overall capacity of the site is difficult to assess given the allocation is being delivered in a piecemeal rather than comprehensive way. The allocation is an approximate figure only and does not preclude additional homes being delivered if demonstrated as appropriate through the planning application process.</p>
<p><i>Object to the inclusion of self-build and custom house building plots:</i></p> <ul style="list-style-type: none"> Government has not yet published policy specifics in relation to the initiative. <p>Little evidence of the demand for self and custom built houses within the Borough. The Housing Mix Topic Paper identifies 87 individuals on the register in the first base period and 80 seeking plots of land in the Borough. This is a very small number across the 19 year plan period - 4 per annum.</p> <p>The West Surrey SHMA 2015 considered plots within larger schemes, but most new delivery would be on small windfall sites.</p> <p>The Topic Paper states that there is no definitive number of plots sought but that Guildford BC seeks their inclusion on suitable site allocations over 100 homes. The draft policy specifies that 5% of the total homes shall be available as self-build and custom housebuilding plots 'whilst there is an identified need'. This approach is both unfounded and arbitrary: There is no basis for the selection of sites of over 100 units in size particularly bearing in mind the conclusion drawn in the SHMA that the majority are likely to come forward on small windfall sites; or the selection of the 5% requirement - the need for which the Ipa itself acknowledges is uncertain: 'whilst there is an identified need'. This level of uncertainty will have an adverse impact on development decisions.</p>	<p>The Self-Build and Custom Housebuilding Act 2015 as amended by the Housing and Planning Act 2016 place a duty on local authorities to give suitable development permission for enough serviced plots of land to meet the demand for self-build and custom housebuilding in their area. Planning Practice Guidance (July 2017) has been recently updated to give further Government guidance.</p> <p>The Council can meet these duties and the demand for self-build and custom housebuilding in Guildford by allocating suitable sites and introducing a threshold through the Local Plan requiring the provision of suitable plots on larger housing sites. It is an approach also taken by other local authorities with emerging or adopted Local Plans.</p> <p>The Council has taken significant steps to address the potential future need for self-build and custom build plots. The evidence of need and demand for self-build and custom housebuilding plots is demonstrated through the numbers of applicants on the Guildford Self-Build and Custom Housebuilding Register. We have used this data, and taken into account the likely impact of the new eligibility criteria, to make reasonable assumptions about the future need for this type of housing in Guildford borough. An update to the Local Plan and CIL Viability Study looks at the impact on viability in respect of accessible homes and custom and self-build housing.</p>

<p>The requirement for self-build and custom housebuilding is unsound based on inadequate evidence, prematurity in pre-empting confirmation of the Government's future policy specifics and the level of uncertainty introduced which will have an adverse impact on development decisions. Consequently the policy will be ineffective.</p>	
<p><i>New road bridge and footbridge scheme (scheme LRN21): Physical engineering feasibility questioned:</i></p> <ul style="list-style-type: none"> • A minimum clearance of 5m needs to be achieved. With a gradient of the road of say 1 in 20 and a structural build of 1m (minimum), a ramp would need to be 120m long to both sides of the railway. The land allocated for this proposal in Policy A30 does not appear to be sufficient. 	<p>Initial engineering feasibility work has been undertaken and confirms a scheme can be delivered.</p>
<p><i>New road bridge and footbridge scheme (scheme LRN21): New car parking required near railway station:</i></p> <ul style="list-style-type: none"> • After 'new road bridge', add: 'A new off-street car park will also be provided on the north side of the railway to the east of A323 Church Road to serve additional residents in the general area and to reduce problems caused by parking on nearby roads'. The new car park will be landscaped and secure. It will be funded by contributions from developers and/or Guildford Borough Council in view of the need to address travel problems which will arise from the Council's policies of adding new homes in the area (1200 in Ash and Tongham)'. The land on both sides of railway between the diverted road via the new bridge and the existing Guildford Road should be used for additional car parking for station users and a pick up/set down area plus relocated bus stops close to the station entrance(s). 	<p>Paragraph 18 of Planning Practice Guidance on Local Plans states that 'the key infrastructure requirements on which delivery of the plan depends should be contained in the Local Plan itself'. A new off-street car park is not considered a key infrastructure requirement for delivery of this policy.</p>

<p><i>New road bridge and footbridge scheme (scheme LRN21): Bridge not necessary in highway capacity terms:</i></p> <ul style="list-style-type: none"> • Although implementing scheme LRN21 would be effective in reducing delay to the local highway network, it is not necessary in highway capacity terms as the operation of the level crossing would still be within capacity even after the Local Plan developments are implemented. 	<p>Network Rail, in its response to the consultation on the Draft Local Plan 2017, considers that the Policy A29 allocation will impact adversely on the safe operation of the level crossing at Ash, and accordingly the closure of the level crossing is required.</p>
<p><i>New road bridge and footbridge scheme (scheme LRN21): Funding sources for new bridge:</i></p> <ul style="list-style-type: none"> • Deliverability of this scheme, including to the timescale identified in the Infrastructure Schedule, is questioned on the basis that the funding sources are uncertain: <ul style="list-style-type: none"> • Understood that there has been no submission of an Expression of Interest for this scheme to the Enterprise M3 Local Enterprise Partnership by March 2016 for schemes to be delivered by 2020/21. • Network Rail's funding contribution is uncertain. • Network Rail would likely have to also fund a new pedestrian/cycle footbridge with lifts in order to maintain, or improve, the current level of accessibility for local residents, costing approximately £1.5m. • Unclear why Guildford Borough Council would classify this new bridge as 'anticipated' rather than 'aspirational' in the Guildford Borough Transport Strategy 2016 (Guildford Borough Council, June 2016). 	<p>Discussions have now progressed on this issue. Network Rail has committed funding to the project.</p> <p>Definitions of the status categories for transport schemes of 'committed' and 'anticipated' are given in the Guildford Borough Transport Strategy 2017 (Guildford Borough Council, December 2017) as follows:</p> <ul style="list-style-type: none"> • Committed: Definite funding has been secured and any remaining planning and statutory approvals will be straightforward to achieve • Anticipated: Subject to a positive business case, funding can be secured and planning and statutory approvals achieved; or where there is a planning requirement to provide the scheme. <p>These status categories are not used to categorise schemes in the Infrastructure Schedule at Appendix C of the Submission Local Plan or in the Draft Local Plan 2016 or Draft Local Plan 2017.</p> <p>When the transport schemes listed in Infrastructure Schedule at Appendix C of the Submission Local Plan are cross-referenced in the Guildford Borough Transport Strategy 2017, it can be seen that the majority have a 'anticipated', as opposed to a 'committed', status.</p>

<p><i>Cycling and pedestrian routes, including signals, to the station required:</i></p> <ul style="list-style-type: none"> • Cycling and pedestrian routes should be provided to Ash rail station. 	<p>Cycle and pedestrians improvements are within the scope of scheme LRN9 A323 Ash Road, Ash Street and Guildford Road (Ash) traffic management and environmental improvement scheme.</p>
<p><i>Traffic flow onto A323:</i></p> <ul style="list-style-type: none"> • Concerned about the increased traffic flow and congestion on the A323 Aldershot Road into Guildford as identified in the Guildford Borough Proposed Submission Local Plan “June 2016”: Strategic Highway Assessment Report (Surrey CC, June 2016), which will require a mitigation scheme to manage traffic impact including on accesses to the road. 	<p>The Guildford Borough Proposed Submission Local Plan “June 2016”: Strategic Highway Assessment Report (Surrey CC, June 2016) (hereafter the SHAR 2016) represents a robust “worst case” in terms of transport demand and supply assumptions, as it does not assess and therefore does not account for the mitigation; including the potential for modal shift, and the new and improved sustainable transport choices provided by the rail, bus and active modes schemes included in the Draft Local Plan 2016 and makes no allowance for any internalisation of trips within the larger sites.</p> <p>The SHAR 2016 concludes that “The results show that for Scenario 5, which represents the quantum and distribution of development proposed in the Proposed Submission Local Plan together with the key highway schemes, there will not be a severe impact on the local and strategic highway network” (p.62). The addendum to the SHAR 2016 (Guildford BC, June 2017) found that this conclusion was “not considered likely to change” as a result of the key changes made to proposed site policies and to the programme of transport schemes in the Draft Local Plan 2017.</p> <p>New development that will generate significant amounts of movement, will, at the planning application stage, be supported by a Transport Statement or Transport Assessment, and subject to the policy tests in NPPF paragraph 32 and Policy ID3. New developments may be required to provide mitigation measures additional to those in the Infrastructure Schedule.</p> <p>In addition, the Submission Local Plan provides the planning policy</p>

	<p>framework to allow for the consideration of such additional mitigation either through the development management process for planning applications, having regard particularly to Policy ID3 at point (7), or through any updates to the Infrastructure Schedule provided in the latest Guildford borough Infrastructure Delivery Plan, as provided for in Policy ID1 at point (4) and in Policy ID3 at point (8).</p>
<p><i>Highway changes will change the nature and character of the area:</i></p> <ul style="list-style-type: none"> Egress from the main sites onto Ash Green Road or Harpers Road is undesirable, bearing in mind the character of these roads and the risk of injury accidents. The junctions of Harpers Road/A323 Guildford Road and Wyke Lane/A323 Guildford Road have accident records. Also, at the Harpers Road/Pound Lane junction there are historic buildings close to the road. Substantial improvement to these roads would be difficult and costly, taking into account a narrow railway bridge etc. The character of the roads which lead to and from the A323, could change so that they are no longer quiet, pleasant, rural lanes. Along the A323, the provision of more traffic signals (compared with roundabouts) would change the character of the A323 from rural to urban. Road widening, which might involve taking land from the recreation ground, would not be welcome. 	<p>Several elements of the policy requirements recognise the historic location of Ash Green village.</p> <p>The links between the development sites and between Ash Lodge Drive and Foreman Road will provide connections in order to maximise accessibility and help alleviate congestion on the A323.</p>
<ul style="list-style-type: none"> Requirement (9) fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by the Policy A29 allocation. Therefore solutions to the following areas are also required before any development of A29 is permitted. <ul style="list-style-type: none"> The Street in Tongham A331/A323 intersection A31/White Lane junction 	<p>The Infrastructure Schedule at Appendix C includes the following schemes:</p> <ul style="list-style-type: none"> LRN15 The Street (Tongham) environmental improvement scheme LRN13 Aldershot Road/A331 Blackwater Valley Route (Ash) junction improvement scheme <p>The Infrastructure Schedule at Appendix C also includes scheme LRN16 – A31 Hog’s Back (Tongham to Puttenham) road safety scheme. This is a key infrastructure requirement on which the delivery of the plan depends. The junction of White Lane with the A31 Hog’s Back will be reviewed in the development of this scheme.</p>

<p>Site promoters (various)</p> <ul style="list-style-type: none"> Object to requirement (9) for 'Land and provision of a new road bridge which will form part of the A323 Guildford Road, with an associated footbridge, to enable the closure of the level crossing on the A323 Guildford Road, adjacent to Ash railway station', on various grounds as follows: <p><u><i>Not justified/necessary/technical justification has not been provided</i></u></p> <p>Requirement (9) fails the tests of soundness in terms of not being justified, positively prepared, effective or in compliance with national policy.</p> <p>The Council has not presented any evidence either as part of the policy or in any supporting documentation, and/or has not undertaken a fit-for-purpose assessment, to:</p> <ul style="list-style-type: none"> - justify why a bridge over the railway in Ash is required either as part of the housing allocation or in isolation. - determine whether the impact arising from the site Policy A29 allocation in Ash and Tongham, including considering with and without already permitted sites, would give rise to a 'severe' cumulative impact as required by paragraph 32 of the NPPF such that mitigation to the railway crossing would be required, including assessing impact of Surrey County Council's proposal for the closure of the junction of White Lane with the A31 Hog's Back, and the impact of increased frequency of rail services on the North Downs Line. Following on from this would need to be an assessment of options in the event that mitigation was required. <p>Scheme LRN21 is unlikely to offer any real benefit in terms of reducing journey times or queue lengths on the A323 Guildford Road. If scheme LRN21 can be justified, it will predominately be due</p>	<p>The Council disagrees. Network Rail, in its response to the consultation on the Draft Local Plan 2017, considers that the Policy A29 allocation will impact adversely on the safe operation of the level crossing at Ash, and accordingly the closure of the level crossing is required.</p> <p>The only way of Network Rail being able to close the crossing is by providing a bridge over or an underpass under the railway to enable the A323 to be segregated from the railway.</p> <p>It is unlikely that an underpass would be acceptable in this location, given the local surface water flooding issues.</p> <p>Feasibility work undertaken for the Council has shown that an on-line improvement on the A323 to provide a bridge is not feasible given the limitations of space and access requirements to adjacent properties.</p> <p>However, it is feasible to provide a road and bridge through site allocation Policy A29 to replace the existing section of the A323 adjacent to and over the level crossing which would then enable Network Rail to close the level crossing.</p> <p>Once this site is developed for housing, the opportunity to close the level crossing will be lost unless the allocation allows for a suitable route.</p> <p>The Draft Local Plan 2017 has taken account of comments received in the 2016 consultation by being less prescriptive on the alignment of the route and this has resulted in the removal of Policy A30.</p> <p>Not being prescriptive on the route will enable the most efficient design solution to come forward that will have the least impact on the amount of developable land,</p>
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to the increased frequency of rail services on the North Downs Line, other changes to the local and strategic road networks such as Surrey County Council's proposal for the closure of the junction of White Lane with the A31 Hog's Back, which are not related to the delivery of the site Policy A29 allocation ie. any 'need' comes about through the delivery of strategic aims within the Local Plan and not solely as a result of the proposed allocation.

The Council has not sought to establish those parts of the allocation that will have an impact on the crossing and those that will not.

Policy A29 covers a wide area with very different characteristics and as such the impacts on the local highway network differ considerably between the identified land parcels and as such not all 'Requirements' are directly related to each of the land parcels identified. A 'generic' approach to collecting an unprecedented level of transport contribution over the whole allocation towards a scheme which is yet to be justified in transport terms is therefore not fair and reasonable and does not meet the requisite tests.

On the basis of Surrey County Council's review of applications in Tongham, it is evident that a new road is not necessary to support the delivery of the sites in Tongham which are included in the Policy A29 allocation.

As has been shown through the planning applications submitted at Land North of Grange Road, Tongham (ref: 17/P/00529), Land South of Grange Road, Tongham (ref: 14/P/02398) and Land at Manor Farm, The Street, Tongham (ref: 16/P/00222) the impact in traffic terms at the existing level crossing is de-minimis and has never been raised as an issue by either Guildford Borough Council or Surrey County

The most appropriate transport masterplan for the area bounded by the A323/Foreman Road/Ash Green Road/Harpers Road would be to connect the parcels of land together through internal access roads which will enable the majority of new development in this area under site allocation Policy A29 to connect through to the new A323 route over the railway rather than sites connecting directly onto Foreman Road and Ash Green Road.

This would enable the additional development traffic to link directly with the A323, prevent development traffic flows using inappropriate lanes and minimising the impact of development traffic on the White Lane/A31 Hog's Back junction.

The contribution required from each component site of the Policy A29 site allocation towards the provision of the land and new road bridge is not set out in the Submission Local Plan. Also the scheme can be broken into a number of projects and therefore the pooling restriction of five contributions could be overcome if Section 106 contributions are required.

Although individual component sites of the Policy A29 site allocation may have up to now been able to demonstrate that they do not create a severe residual impact, cumulatively Network Rail has advised that the level of additional development from Policy A29 will impact adversely on the safe operation of the level crossing at Ash, and accordingly the closure of the level crossing is required.

Alternative options such as providing a footbridge have not been pursued because Network Rail has requested the closure of the level crossing for all traffic if the quantum of development in Policy A29 is to be acceptable.

Further information is provided in the Transport topic paper (2017).

The Sustainability Appraisal has taken account of site Policy A29.

Council as the Local Highway Authority.

Alternative options have not been considered

Alternative options have not been considered, such as improving alternative routes, traffic management or a footbridge only solution, or any cost benefit analysis provided.

The delivery of scheme LRN21 is merely to meet an aspiration of Guildford Borough Council which is not soundly founded on robust evidence.

Feasibility and deliverability of a new road bridge has not been demonstrated in engineering terms

The feasibility of a new road bridge has not been demonstrated in engineering terms.

The practicality of timeliness of delivery has not been demonstrated given the need to cross a live rail line.

The Policy A29 site does not include the land necessary to provide for a new road and footbridge over Ash railway line, such that the Council's ability to ensure delivery of this facility has not been demonstrated.

Because the Council has deleted draft Policy A30 and not replaced this area within Policy A29, significant doubt is raised as to whether there is actually sufficient land within the scope of the allocation to deliver scheme LRN21. There is no justification given for the deletion of draft Policy A30 and given that requirement (9) in Policy A29 as amended does not replicate the deleted policy, this increases the doubt on the Council's case for its inclusion.

The rationale for the deletion of Policy A30 and the proposed additions to Policy A29 are not clear, such that the deletion of Policy A30 will effectively prejudice the Local Plan's ability to

deliver the proposed crossing and is, if the bridge is justified, unsound.

Should Guildford Borough Council wish to continue with the aspiration of a replacement bridge as a strategic infrastructure project then it should be retained as Policy A30, as presented in the Draft Local Plan 2016. Alternatively, should it be retained within Policy A29, it should be relocated to the 'Opportunities' section of the Policy and clarity should be provided within the Policy to identify that Requirement (9) is not related to the delivery of the Tongham sites.

Viability and the delivery of affordable housing

It is understood that the level of developer contribution is likely to run to circa £12,000 per dwelling - an unprecedented level of transport contribution, which could potentially jeopardise the delivery of other elements of development in Ash such as affordable housing.

No assessment of financial viability has been undertaken to determine whether the costs are reasonable related in scale and kind to the residential development proposed.

No consideration has been given to the viability of delivering the bridge relative to the number of sites that have permission and those that remain subject to applications/ have yet to be bought forward in the allocated area.

Of the 1,750 homes allocated in Policy A29, 725 dwellings have already been granted planning permission, leaving only 1,025 dwellings remaining of which a further 647 dwellings are the subject of live planning applications means that the pool of available dwellings against which the costs of delivering a bridge can be levied via a Section 106 obligation is relatively small.

Not subject to Sustainability Appraisal

The introduction of requirement (9) in Policy A29 in the Draft Local Plan 2017 and its lack of detail of the bridge proposal raises a serious issue in that the Council cannot possibly contend the proposal has been the subject of Sustainability Appraisal.

Requirement (9) fails the legal test in terms of not having been the subject of Sustainability Appraisal.

CIL not appropriate to fund scheme LRN21

The proposal for scheme LRN21 in Policy A29 fails all of the statutory tests set out in Regulation 122 of the Community Infrastructure Levy Regulations 2010.

Section 106 not appropriate to fund scheme LRN21

It is understood that the Council intends to collect financial contributions for the delivery of scheme LRN21 via Section 106 planning obligations rather than using the Community Infrastructure Levy. Given the number of individual ownerships/promoters all active within the Ash and Tongham allocation area the approach the Council proposes will fail to meet the requirement of Regulation 123 of the Community Infrastructure Levy Regulations 2010 and consequently would be unlawful.

Local Growth Fund should provide funding

Guildford Borough Council's identified mitigation is not solely development related and as such the funding source should, for consistency with other infrastructure projects included in the Infrastructure Schedule, make an allowance for some funding to come from the Local Growth Fund.

<ul style="list-style-type: none"> The impacts in the locations to be mitigated by the following schemes, which may relate to the Policy A29 allocation, are already apparent and related to strategic growth, and therefore should be funded, in part, by the Local Growth Fund: <ul style="list-style-type: none"> LRN9: A323 Ash Road and Guildford Road (Ash) traffic management and environmental improvement scheme LRN11: B3411 Ash Hill Road/A323 Guildford Road (Ash) junction improvement scheme. 	<p>Funding for these schemes has yet to be determined but they will be through Section 278, Section 106 or CIL as appropriate.</p>
<ul style="list-style-type: none"> Land at South Ash Drive has already made provision for a doctor's surgery (criterion 2) such that the need for others to do so is open to debate. Furthermore, there is no claw back mechanism within the Section 106 for the land at South Ash Drive for the developer to receive contributions from others to help offset the costs of providing the doctors surgery such that this cost has been born solely by those developing the land at South Ash Drive (A2 and Bewley). It is thus questionable as to whether the inclusion of requirement (2) in Policy A29 as amended is justified, and accords with national government guidance in terms of the CIL regulations. 	<p>Land south of Ash Lodge Drive has made provision for the land only. Site allocation A29 therefore requires contributions from remaining sites in order to contribute to the cost of providing the GP surgery, or at an alternative location within the vicinity of the site. Land south of Ash Lodge Drive remains included within A29 so it remains appropriate that the requirement refers to "land and a new building" in the event that this permission lapses or another planning application is submitted.</p>
<p><i>Historic environment:</i></p> <ul style="list-style-type: none"> Land North of Ash Green Road and East of Foreman Road is close to the 13th century Manor House which has a moat, and is on or near to land which was once the village green. 	<p>A requirement has been added in relation to sensitive design at the site boundaries with the adjacent complex of listed buildings at Ash Manor.</p>
<ul style="list-style-type: none"> Requirement (8) does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows: "Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected." 	<p>The protection of views is a consideration when assessing the impact of development on a listed building. We consider that the amendment proposed merely provides more detail to the requirement.</p> <p>The Council proposes to the inspector that the following change is made to Requirement (8): Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. <u>Views to and from this heritage asset, including their approach from White Lane, must be protected.</u></p>

A31 Land northeast of Spoil Lane, Tongham

No Main Issues.

Draft

A32 Surrey Police Headquarters, Mount Browne, Sandy Lane, Guildford

Main Issue	Guildford Borough Council Response
<p><i>Representations from Prescribed Bodies and Selected Stakeholders</i></p>	
<p>Surrey County Council</p> <ul style="list-style-type: none"> An additional requirement should be included: “Close rear access to Sandy Lane for vehicular use”. 	<p>The council does not consider that this suggested requirement is necessary for this site.</p> <p>The initial information provided by the promoter of the site suggests that there will be a reduction in traffic impact on Sandy Lane compared to the existing use.</p> <p>This matter could be considered further as part of a Transport Assessment at planning application stage and if, at that stage, it is deemed necessary, then access to Sandy Lane could be restricted in order to maintain the safe operation and performance of the Local Road Network to the satisfaction of Surrey County Council as the Local Highway Authority. This would be consistent with Policy ID3 at point (7) in the Draft Local Plan 2017.</p>
<p>The National Trust</p> <ul style="list-style-type: none"> This site is close to the River Wey and is highly visible heading downstream from Shalford to Guildford. The redevelopment of this site would have a potentially major impact on the amenity of the River Wey and the setting of the River Wey Conservation Area, the AONB, the St Catherine’s Conservation Area and the setting of the St Catherine’s Scheduled Ancient Monument. 	<p>A requirement has been added to have regard to the character of the adjacent conservation area and views in and out of the River Wey Conservation Area. The key considerations include the fact that the site is within the AONB and adjacent to St Catherine’s Conservation Area.</p>

<p>Thames Water</p> <ul style="list-style-type: none"> Water and wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. <p>Upgrades required – can take 18 months to 3 years to deliver.</p> <p>Detailed water supply and drainage strategy, and planning condition required.</p>	<p>Policy ID1 is targeted to ensure the timely provision of infrastructure necessary to support new development. At the site level, any planning permission may be subject to a Grampian planning condition, preventing occupation until any necessary upgrades have been made.</p>
<p>Site promoter</p> <ul style="list-style-type: none"> The site should be expanded and capacity increased. 	<p>An expansion of the site is contrary to the findings of the GBCS. Further development here would harm the openness of the Green Belt.</p>
<p>Natural England</p> <ul style="list-style-type: none"> These sites are within the Surrey Hills Area of Outstanding Natural Beauty. We advise the LPA to take into account the relevant Management Plan for the area and should seek the views of the AONB Partnership. Development proposals brought forward through the plan should avoid significant impacts on protected landscapes, including those outside the plan's area and early consideration should be given to the major development tests set out in paragraph 116 of the National Planning Policy Framework (NPPF). <p>These sites are adjacent to ancient woodland. The policies should ensure that any direct or indirect impacts on these sites are avoided or mitigated.</p>	<p>Any development proposals would need to be consistent with Policy P1 and the NPPF in respect of the AONB. The presence of ancient woodland is listed as a key consideration. Appropriate mitigation will be considered as part of the planning application process.</p>
<p>Representations on Specific Issues</p>	
<p><i>Green Belt:</i></p> <ul style="list-style-type: none"> Green Belt should be protected. No exceptional circumstances demonstrated. 	<p>The site was recommended for inseting in the GBCS. The exceptional circumstances that justify removing it from the Green Belt are set out in the Green Belt and Countryside Topic Paper.</p>

A33 The University of Law, Guildford

Main Issue	Guildford Borough Council Response
<p>Representations from Prescribed Bodies and Selected Stakeholders</p>	
<p>Site promoter</p> <ul style="list-style-type: none"> A scheme for the site is still emerging therefore it is unreasonable at this stage to state that buildings higher than two storeys are unlikely to be suitable. 	<p>The reference to two storeys has been deleted.</p>
<p>Site promoter</p> <ul style="list-style-type: none"> The allocation should remain silent on the number of bedspaces whilst a scheme is still emerging and the likely capacity is unknown. 	<p>It is appropriate for the allocation to set out an approximate capacity of the site. The planning application will be informed through further design work, which may demonstrate that the capacity is different.</p>
<p>Natural England</p> <ul style="list-style-type: none"> These sites are within the Surrey Hills Area of Outstanding Natural Beauty. We advise the LPA to take into account the relevant Management Plan for the area and should seek the views of the AONB Partnership. Development proposals brought forward through the plan should avoid significant impacts on protected landscapes, including those outside the plan's area and early consideration should be given to the major development tests set out in paragraph 116 of the National Planning Policy Framework (NPPF). <p>These sites are adjacent to ancient woodland. The policies should ensure that any direct or indirect impacts on these sites are avoided or mitigated.</p>	<p>Any development proposals would need to be consistent with Policy P1 and the NPPF in respect of the AONB. The presence of ancient woodland is listed as a key consideration. Appropriate mitigation will be considered as part of the planning application process.</p>

A34 Broadford Business Park, Shalford

Main Issue	Guildford Borough Council Response
<p>Representations from Prescribed Bodies and Selected Stakeholders</p>	
<p>National Trust</p> <ul style="list-style-type: none"> This site also abuts the River Wey and Godalming Navigations Conservation Area yet no reference to the consideration of the Conservation Area is made in the policy. 	<p>Site removed from the plan and protected for employment use.</p>
<p>Thames Water</p> <ul style="list-style-type: none"> Wastewater network and water treatment capacity in this area is unlikely to be able to support the demand anticipated from this development. <p>Upgrades required – can take 18 months to 3 years to deliver.</p> <p>Detailed water supply strategy, drainage strategy, and planning condition required.</p>	<p>Site removed from the plan and protected for employment use.</p>
<ul style="list-style-type: none"> Object to removal of a brownfield site from the Plan. This is contrary to the brownfield first policy and national planning policy. 	<p>Broadford Business Park is required to meet the identified need for B1a employment floorspace over the plan period.</p>

<p>Site promoter</p> <ul style="list-style-type: none">• Zurich strongly objects to GBC’s decision to designate Broadford Business Park as a Locally Significant Employment site (LSES). <p>Broadford Business Park is not situated in a sequentially preferable location for employment purposes.</p> <p>The buildings have now reached the end of their economic lives, and require substantial investment to bring it up to acceptable standards or redevelop for employment use.</p> <p>The occupants of the existing development are on short term leasehold arrangements that benefit from reduced rental levels to reflect the poor condition of the existing buildings and its relatively remote location that cannot continue.</p> <p>Zurich are therefore concerned that proposed designation of the site as a LSES is unsustainable in the medium to long term and will simply result in vacant floor space that could otherwise be used more effectively i.e. for residential purposes.</p> <p>A Commercial Viability Report (CVR) prepared by Savills, has been submitted in support of these representations to evidence the challenges in maintaining employment uses at the Site.</p> <p>Occupiers are looking for modern office space either in the centre of Guildford or to the north, east or west where access to the A3 and mainline train services is more readily available.</p> <p>Public transport links are poor.</p>	<p>The site has been removed from the plan as an allocation for housing and protected as a locally significant employment site.</p> <p>More detail is set out in the Employment topic paper but the need for employment floorspace and the need to provide a mix of type and quality of floorspace meant the decision was reversed. Broadford Business Park provides a mix of B1a and B1c/B8 floorspace that is almost unique in the borough.</p>
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New build viability - location is unsuited to heavy goods vehicle activity. The narrow bridge to the west also restricts access to the A3 and the Site by larger vehicles needed to support a business park or light industrial development and is also sensitively located within close proximity to residential uses.

All of the development options that have been tested have therefore been found to unviable and would be very unlikely to attract investment from prospective developers.

The cost of refurbishing the existing buildings would not be commercially viable, due to the limited rent currently secured on existing tenants and the subsequent upward pressure on rental levels being likely to render the Site uncompetitive in the market place when compared to better serviced town centre locations.

Vacant possession - Zurich will gain vacant possession of the majority of the Site by 2019, with the remaining building by 2022. Residential development (subject to planning permission being granted) could commence from 2019 with Bishopsgate House retained in the first instance and redeveloped as a second phase.

The Site is capable of delivering a meaningful level of new market and affordable housing; and

The Site is within the single freehold ownership of Zurich with the existing tenant leases due to expire shortly or have break clauses available meaning that any redevelopment for residential purposes could come forward in the first five years of the plan.

A35 Land at former Wisley airfield, Ockham

Main Issue	Guildford Borough Council Response
<p>Representations from Prescribed Bodies and Selected Stakeholders</p>	
<p>Highways England</p> <ul style="list-style-type: none"> In its representation on the Draft Local Plan 2016 dated 18 July 2016, Highway England stated that the proposed primary vehicular access to the site allocation via the A3 Ockham interchange is 'not considered Justified, Effective, or "sound" in line with the NPPF', on the basis that: <ul style="list-style-type: none"> The congestion and safety impacts of the development at this location could be significant Lack of transport evidence base to confirm that the proposed development trips can be accommodated at the A3 Ockham interchange in terms of both capacity and safety. <p>Recommended 'that for Policy A35 to be Effective and "sound" in accordance with the NPPF':</p> <ul style="list-style-type: none"> The deletion of 1st and 2nd bullet points in Requirements. New text to be added to the text of the 3rd bullet point in Requirements: 'Interventions will be required which address the potential highway performance issues which could otherwise result from the development. The Infrastructure Schedule in the latest Infrastructure Delivery Plan identifies the locations on the Local Highway Network and the Strategic Highway Network which could be expected to experience the most significant potential highway performance issues, in the absence of mitigating 	<p>Following a meeting on 1 September 2016 to explain and clarify the approach taken to this matter in the Draft Local Plan 2016, Highways England, in a letter dated 5 October 2016, withdrew its previous representation of 18 July 2016 with respect to this policy as follows:</p> <p>'We consider the policies provide a framework to how proposals can only be progressed if they meet the conditional requirements set out in the individual policies alongside requirements set out in I3. <u>Therefore we formally withdraw these representations.</u> However for further clarity we would recommend that some wording could be clearer particularly around the potential critical infrastructure requirements to enable delivery.' (Underlining in original.)</p> <p>Policies in the Draft Local Plan 2017, including those to which amendments were made, manage the risks arising from the uncertainties regarding the delivery and timing of delivery of the key infrastructure on which the delivery of the Plan depends, including the three RIS schemes. In this regard, see Policies ID1, ID3 (point (8)) and the site Policies A24 (requirement (2)), A25 (requirement (9)), A26 (requirement (9)) and A35 (requirement (5)).</p>

<p>interventions. To include, <u>as a minimum</u>, mitigation schemes to address issues:</p> <ul style="list-style-type: none"> ▪ on the A3 and M25 and at the M25 Junction 10/A3 Wisley interchange ▪ on B2215 Ripley High Street ▪ at the junctions of Ripley High Street with Newark Lane/Rose Lane ▪ at junction of Old Lane with A3 on-slip (Guildford bound). <p><u>Planning permission will not be granted for this site until it has been demonstrated how the adverse impacts to the safe and efficient operation of the local and strategic road networks will be mitigated or if delivery of the site compromises the delivery of emerging improvements.</u> (Additions are marked in underline text as in the original.)</p>	
<p>Highways England</p> <ul style="list-style-type: none"> • In its representation on the Draft Local Plan 2017, under headings referencing policies A35, A43, A43a, A58, Appendix C and the Transport topic paper, stated that: ‘As stated in our letter dated 5 October 2017, it remains unclear if the two new slip roads at A247 Clandon Road (Burnt Common) are deliverable and what the conditional requirements are to enable the proposals to progress. It is not clear if proposals set out in Policy A43 (and now additionally Policy A58 and A35) are dependent on GBC’s aspirations set out in A43a. Appendix C Infrastructure Schedule notes that the Burnt Common slip road scheme will be wholly developer funded. To date we do not have any evidence that such an improvement is deliverable and could be designed in conformity with the Design Manual for Roads and Bridges. We would welcome further discussions on these policies. <p>We understand that the Wisley Airfield site is expected to go</p>	<p>Schemes SRN9 and SRN10, allocated in Policy A43a, are being promoted to mitigate the impact of the level of strategic planned growth and in particular the development traffic flows resulting from the development of a new settlement at the former Wisley airfield site (Policy A35), as well as limiting any increase in traffic joining and leaving the A3 at the Ockham interchange. Requirement (4) for the site allocation Policy A35, as proposed in the Draft Local Plan 2017, is that the two new slip roads are the identified mitigation to address the impacts on Ripley High Street and surrounding rural roads.</p> <p>The Council considers that site allocation Policy A43, as well as Policy A58, are not directly dependent on schemes SRN9 and SRN10, allocated in Policy A43a. Rather, as stated above, the Council has planned on the basis that these schemes will be delivered by the developer of the former Wisley airfield site (Policy A35) and that this will be ‘when first needed to serve the development’s occupants and users and/or to mitigate its otherwise adverse material impacts’ (Policy</p>

<p>to Planning Appeal in September 2017 which will likely have implications for the soundness of these policies, therefore discussions are urgent if proposals are reliant upon the improvement set out in A43A [sic] that is being promoted by Guildford Borough Council and Surrey County Council.’ [Second paragraph in text box in the original.]</p>	<p>ID1 at point (1).</p> <p>In producing a new Local Plan for its area, Guildford Borough Council as the local planning authority is required to allocate sites for development (NPPF, 2012: paragraph 157) and to assess the quality and capacity of infrastructure for transport and its ability to meet forecasts (NPPF, 2012: paragraph 162). The Submission Local Plan’s spatial strategy and key infrastructure schemes, as included in the Infrastructure Schedule, have been planned together and are interdependent in various ways. In short, the spatial strategy as proposed is dependent on the key infrastructure schemes as proposed.</p> <p>Guildford Borough Council considers that schemes SRN9 and SRN10, allocated in Policy A43a, are deliverable. Work is ongoing to demonstrate the Council’s position.</p>
<p>Mole Valley District Council</p> <ul style="list-style-type: none"> • Site is partly in Flood Zone 3 and will need to include measures to mitigate flooding in the wider area. <p>The allocation at Wisley Airfield will result in a significant increase in the local population, and it is noted that no specific provision has been made for primary health care. MVDC would expect GBC to consult with both Guildford and Waverley and Surrey Downs CCGs in order to address any cross-boundary issues that may result in a deficit of primary health care places in MVDC, specifically Bookham where the draft NHP has identified an existing need. It may be beneficial if any consultation on this topic would include NHS England South East Region and that development aligns with the strategic transformation plan as agreed by the Surrey Heartlands Collaboration which includes social care and health.</p>	<p>Appropriate mitigation for flood risk is listed as a requirement in the site allocation.</p> <p>The allocation includes 500sqm of community uses (D1) that could support a health facility. The Infrastructure Schedule at Appendix C includes the provision of this land at nil cost by the developer linked to the planned provision of a GPs surgery with pharmacy (HSC4).</p>

Elmbridge Borough Council

- The site is located in the very north west of the Guildford Borough where the Green Belt is already very fragmented and particularly vulnerable to additional development, a point that was noted by the Inspector for the examination into our Core Strategy. It is therefore considered that further evidence should be provided to indicate why this site has been identified in preference to other sites having regard to the strategic significance of the Green Belt in this location.

Unclear of the relationship between the GBCS sensitivity analysis and subsequent identification of potential sites

Council has been selective in assessing the environmental capacity and sustainability of the parcels. Query why only those parcels on the edge of the urban edge were considered. Furthermore, Parcel G18 (Wisley) is not located next to the urban edge and therefore in accordance with this general approach, should have been excluded for further consideration as have other similar parcels.

Table 1- Planned Delivery between 2018 and 2033 should be amended to show more clearly when it is envisaged that each strategic allocation would be delivered rather than generically stating the period of 1 - 15 years. Our concerns regarding the impact on the strategic road network remain, particularly in regard to the proposed development at Wisley but also other proposed development sites along and in close proximity to the A3. For example, Policy A43 Land at Garlick's Arch, Send Marsh/Burnt Common and Ripley which will further compound the impact on the road network should the appropriate mitigation measures not be implemented. Without the mitigation measures identified in the Government's Road Investment Strategy (RIS) (phases 1 and 2) the residual cumulative impact of the Proposed

The allocation of Wisley airfield is based upon the findings on the GBCS and other sustainability considerations linked to our spatial hierarchy. As set out in our SA we do not consider there to be alternatives to Wisley airfield given the housing need and the infrastructure it provides to support the development itself and wider growth proposed in the borough.

The GBCS has assessed all land parcels against the Green Belt purposes to arrive at the sensitivity analysis. Whilst this helped inform the spatial strategy it did not serve as a showstopper to the identification of potential development areas (PDAs). These were identified on the basis of a number of different potential spatial strategy options – strategic sites around urban areas, small scale growth around villages, significant growth around villages and a new settlement.

Table 1 has been deleted in the Reg 19 Local Plan (2017) as more detailed phasing is set out in the housing trajectory in the LAA. This includes a breakdown of the yearly phasing for all the strategic and larger site allocations. The estimated delivery has been informed from assumptions on the likely delivery of associated infrastructure including the RIS schemes. The delivery timescales for Road Investment Strategy schemes are based on the best knowledge of the Council following on-going liaison with Highways England. Policy ID1 requires that the necessary infrastructure is provided and available when first needed. This will be secured through planning condition and/or planning obligation.

<p>Submission Local Plan on the highway network could be considered severe. As set out in the evidence base, the RIS schemes are complicated and may involve land acquisition and planning permission and, as a result, Highways England is cautious about programming these schemes. Given these complications, and also the infrastructure required on-site to support the scheme and the securing of the land north of the site for Suitable Alternative Natural Greenspace (SANG) (in regard to the Wisley scheme), it is considered that the Borough Council could provide a better estimate in terms of delivery knowing that the development of some sites is unlikely to be in the first few years of the plan.</p>	
<p>Elmbridge Borough Council</p> <ul style="list-style-type: none"> Should the capacity, and therefore infrastructure requirements, be increased as a result of the increase in site area. 	<p>Part of the land in the southern area may be required to be delivered as SANG should the capacity of the site be increased above the level currently being pursued through the planning application. Additionally the southern extension is necessary to overcome some of the design/heritage issues identified in the planning application proposal. We therefore do not consider it is appropriate to increase the capacity of the site.</p>
<p>Surrey County Council</p> <ul style="list-style-type: none"> There are no significant implications in terms of the safeguarding of mineral resources. The proposed new settlement at the former Wisley Airfield (A35) is located within a minerals safeguarding area but it is considered very unlikely that the underlying sharp sand and gravel resource will be worked in future. Nevertheless, should the site be allocated in the Local Plan, the applicant should be required to investigate the potential for prior working before any planning application being submitted. <p>More detail is required in the column headed, "Requirements" regarding the potential interventions that will be required to</p>	<p>Its location in a minerals safeguarding area has been added to the policy under key considerations.</p> <p>A new requirement (numbered 4) has been added in the Draft Local Plan 2017: 'The identified mitigation to address the impacts on Ripley High Street and surrounding rural roads comprises two new slip roads at A247 Clandon Road (Burnt Common) and associated traffic management'.</p> <p>The site is no longer available for a waste use. This will be reflected within the new waste plan which is currently being prepared.</p>

address issues on B2215 Ripley High Street. This comprises two slip roads at A247 Send. If the land necessary for these has now been secured, it is presumed that there will not be a problem in linking these to Wisley.

Some 17 ha is allocated for waste management use under Policies WD2 & WD5 of the SWP and is also considered suitable for aggregate recycling. The proposed allocation contains no specific waste use allocation other than an allocation for general industrial purposes which could in principle include some suitable, but smaller scale, waste uses (see below).

The county council would wish to see part of the site continue to be allocated specifically for waste management purposes (the county council acknowledges that much less than 17 ha would be required for waste management purposes - perhaps of the order of 5 ha including any necessary environmental buffer). Therefore as waste planning authority, we object to this proposed policy as it involves the loss of this waste management site and is therefore contrary to SWP 2008 Policies WD2 and WD5 and government policy contained in the NPPW. We consider the Plan to be unsound in terms of being positively prepared in that it does not take account of this acknowledged requirement for waste management facilities and the SWP allocation.

In view of the ongoing need for additional waste management capacity in Surrey, including for the recycling of construction and demolition waste, the proposal would prejudice the successful implementation of the SWP by reducing land availability for such uses and limiting flexibility to make adequate strategic provision. As such it will fetter the implementation of the waste hierarchy and undermine the targets included in SMP Core Strategy Policy MC5 for the

<p>production of alternative aggregates in Surrey.</p> <p>The county council is currently in the early stages of preparing a new waste plan that will consider the need for new waste management capacity in the county.</p>	
<p>Historic England</p> <ul style="list-style-type: none"> Some of the more significant (strategic) sites will require archaeological investigation / assessment prior to development especially where there is known to be historical activities that may be retain structures or remains of heritage significance <p>For former Wisley Airfield, a heritage assessment will be needed in relation to the sites historic association with aviation development/innovation.</p>	<p>Policy D3 seeks to conserve and enhance the historic environment. It also covers designated and undesignated heritage assets, which includes areas of archaeological potential.</p>
<p>NATS LTD</p> <ul style="list-style-type: none"> Include following requirement: <i>“The airfield site hosts an aeronautical navigation beacon, known as the Ockham DVOR/DME. This is an integral part of the UK aeronautical infrastructure and serves a number of major airports in the South East. When considering planning application(s), engagement with the operator (NATS En Route PLC) should be sought as early as practicable in order to ensure that any impact may be assessed and so that any relevant conditions and obligations to planning permission(s) can be attached.”</i> 	<p>This proposed wording has been added as a requirement to the site allocation policy.</p>
<p>Wisley Property Investments (site promoter larger northern part)</p> <ul style="list-style-type: none"> Expansion of the SNCI designation is not justified. <p>The policies map should not include the Surrey Waste Plan allocations which are currently being updated.</p>	<p>The site has been resurveyed for its SNCI value in 2016. The Local Sites Partnership met in early 2017 and continue to recommend that the larger area is designated as an SNCI. The report does however note that the areas considered to be of high ecological value are concentrated on a limited number of locations. Development of the</p>

<p>100 Sheltered/ Extra Care homes should be 'C2 or C3' use.</p> <p>Evidence prepared demonstrates a need for a higher provision of convenience retail space than the allocation allows. The allocation should be increased to 1,200 sq m.</p> <p>The policy wording should be amended to require a re-assessment of secondary education needs at the time that the application is to be <u>'determined'</u>.</p> <p>Delete the requirement for an application level 'Habitat Regulation Assessment'. This is the role of GBC as the competent Authority.</p> <p>Delete the bullet point with respect to site access/ egress and flood risk mitigation – this matter will be addressed in the application FRA.</p> <p>Traveller pitches may be privately or publically managed - should be left to the planning application stage. Objection with respect to nil cost land transfer, and what this effectively means. Delete the bullet points which refer to the tenure requirements for the traveller pitches and reference to nil cost. Include reference to <u>'up to'</u> 8 traveller pitches.</p> <p>In addition, the GBLP should include a Glossary, which defines "approximately" as '+/- 10%'.</p>	<p>site is therefore still considered to be compatible with the designation.</p> <p>Surrey County Council has requested that we include the Surrey Minerals and Waste Plan sites on the policies map to aid with clarity. If either plan is updated post adoption of the Guildford borough Local Plan, then this layer will be superseded by the relevant Surrey County Council plan.</p> <p>The allocation for 100 sheltered/ Extra Care homes has been changed from C3 to C2 use</p> <p>This assessment of education need has been amended to at the time the application is determined to ensure the decision reflects the latest position in terms of education need.</p> <p>Agreed and reference to HRA removed.</p> <p>A new requirement has been added in relation to flood risk.</p> <p>The convenience retail allocation has not been increased as it is considered a greater floorspace would not be appropriate in a local centre. Policy E9 would require a retail impact assessment for any proposals greater than 500sq m.</p> <p>The traveller pitches form part of the affordable housing contribution, and affordable housing is provided at nil cost to the local authority. The provision of public pitches will be managed in a consistent and comparable way to bricks and mortar affordable housing. Phasing is also sought on the delivery of self-build plots and it is considered appropriate to require phasing on pitches to ensure delivery.</p> <p>The requirement for traveller accommodation on sites of 500 dwellings or more is in addition to the allocated sites to ensure sufficient sites are provided to meet identified need. It will guide future planning applications. Site allocations have been considered individually and decisions made on their inclusion within the Local Plan on a case-by-</p>
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	<p>case basis. Site A35 at Wisley Airfield was allocated on the basis that it would provide 8 pitches.</p> <p>Do not consider appropriate to define the term ‘approximately’. The exact capacity of a site will vary on a case-by-case basis through more detailed consideration in the planning application stage.</p>
<p>Wisley Property Investments (site promoter larger northern part)</p> <ul style="list-style-type: none"> No new Main Issues raised 	<p>The site promoter has maintained their outstanding objections made to the Reg 19 Local Plan (2016).</p>
<p>Consortium of landowners of southern parcel</p> <ul style="list-style-type: none"> Capacity should be larger given the additional land to the south compared to the planning application area - should state approximately 2,500 homes. 	<p>Approximately 2,000 homes remains appropriate given the design issues related to the appeal scheme and the need for additional SANG land should the capacity increase.</p>
<p>Consortium of landowners of southern parcel</p> <ul style="list-style-type: none"> The allocation has been increased further still and yet the capacity has not. The allocation should state: in the region of 2,000 – 2,500 homes (C3). 	<p>The allocation is approximate and is not intended to be a cap on further development should it be demonstrated following more detailed design work that additional homes are appropriate.</p>
<p>Thames Water</p> <ul style="list-style-type: none"> Wastewater treatment and network capacity in this area is unlikely to be able to support the demand anticipated from this development. <p>Upgrades required – can take 18 months to 3 years to deliver.</p> <p>Significant infrastructure upgrades to Wastewater Treatment Works required – can take 18 months to 3 years to deliver.</p> <p>Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years.</p> <p>Detailed drainage strategy and planning condition required.</p>	<p>Policy ID1 is targeted to ensure the timely provision of infrastructure necessary to support new development. At the site level, any planning permission may be subject to a Grampian planning condition, preventing occupation until any necessary upgrades have been made.</p> <p>In relation to wastewater connections and treatment infrastructure, the site is reflected in the Infrastructure Schedule at Appendix C and Infrastructure Delivery Plan. Whilst the developer will be required to assess capacity, and provide detailed drainage strategies, this development may also need to be considered as part of Thames Water’s investment planning.</p>

Representations on Specific Issues	
<p><i>Green Belt:</i></p> <ul style="list-style-type: none"> No exceptional circumstances for the site. <p>Site meets the Green Belt purposes and should be protected.</p>	<p>The site was identified as a potential development area in the GBCS. The exceptional circumstances that justify removing it from the Green Belt are set out in the Housing Delivery Topic Paper.</p>
<p><i>Sustainability:</i></p> <ul style="list-style-type: none"> Unsustainable location for development. <p>Site not big enough to accommodate everything or be self-sustaining.</p>	<p>The justification for the spatial strategy and the allocation of this site are set out in more detail in the Housing Delivery Topic Paper.</p> <p>The site allocation is considered to be of a sufficient scale to be able to support a range of uses and associated infrastructure to ensure the site is sustainable. This includes a package of sustainable transport measures which have been agreed with Surrey County Council. The site area is large enough to accommodate the proposed number of homes and supporting uses.</p>
<ul style="list-style-type: none"> Site was refused planning permissions - 14 reasons for refusal must still be valid. 	<p>The Council considers that all the reasons for refusal are capable of being overcome. This is set out in more detail in Housing Delivery Topic Paper.</p>
<p><i>Unacceptable adverse traffic impacts:</i></p> <ul style="list-style-type: none"> The planned development at the former Wisley airfield will result in significantly increased traffic volumes on local and strategic roads, with consequent adverse impacts on their safe operation and performance, on communities and on the environment including impacts on amenity and health, noise pollution and air pollution, with acute problems: <ul style="list-style-type: none"> on A3 trunk road, particularly between the Ockham interchange and the M25 Junction 10/A3 Wisley interchange at the M25 Junction 10/A3 Wisley interchange on the M25 motorway at junctions of Old Lane, Forest Road and Howard Road near Effingham Junction station 	<p>The Guildford Borough Proposed Submission Local Plan “June 2016”: Strategic Highway Assessment Report (Surrey CC, June 2016) (hereafter the SHAR 2016) represents a robust “worst case” in terms of transport demand and supply assumptions, as it does not assess and therefore does not account for the mitigation; including the potential for modal shift, and the new and improved sustainable transport choices provided by the rail, bus and active modes schemes included in the Draft Local Plan 2016 and makes no allowance for any internalisation of trips within the larger sites.</p> <p>The SHAR 2016 concludes that “The results show that for Scenario 5, which represents the quantum and distribution of development proposed in the Proposed Submission Local Plan together with the key highway schemes, there will not be a severe impact on the local</p>

- at junctions of Ripley High Street with Newark Lane/Rose Lane in Ripley
- on A245 High Street in Cobham
- on B2039 Ockham Road North through East Horsley (B2039)
- on A245 Byfleet Road

In addition:

- Unsuitable site access, including that consented access for in-vessel composting facility is not appropriate for this site allocation, that south-facing slip roads should have been considered at the A3 Ockham interchange, and that access via Elm Corner to the site is inappropriate.
- Site is too isolated to allow for trips to be made on foot or by bicycle, with services and facilities are too far away.
- Reliance on private cars for trips.
- The problems caused by lorries and vans using local and minor roads and lanes in the country and in villages, for which they are unsuitable, will be worsened.
- Local roads unsuitable for additional bus movements.
- The problems of high traffic volumes on unsuitable village roads and of parking in villages will be worsened.
- Lack of cycle lanes for cyclists and pavements for pedestrians, and unlit as in a rural area.
- Road safety issues for cyclists, pedestrians and horse riders.
- The DfT's Road Investment Strategy schemes for the M25 Junction 10/A3 Wisley interchange, M25 Junctions 10-16 and A3 Guildford are required to address existing problems.

As a consequence of the above, residual cumulative impacts of planned development at the former Wisley airfield will be severe, failing the policy test set by paragraph 32 in the

and strategic highway network" (p.62). The addendum to the SHAR 2016 (Guildford BC, June 2017) found that this conclusion was "not considered likely to change" as a result of the key changes made to proposed site policies and to the programme of transport schemes in the Draft Local Plan 2017.

The residual cumulative transport impacts of planned development in the Draft Local Plan are not considered to be severe, and so will not fail the policy test set by paragraph 32 in the NPPF.

The likely effects of the emerging plan, and alternatives, on environmental, social and economic issues/objectives, have been considered, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have, through the Sustainability Appraisal process (AECOM).

The Plan-level impacts on air quality and habitats have also been considered in detail, most particularly as evidenced in:

- Air Quality Review of Guildford Borough Proposed Submission Local Plan: Strategy and Sites "June 2017" (AECOM, 2017).
- Habitats Regulations Assessment for Guildford Borough Proposed Submission Local Plan: Strategy and Sites 2017 Update (AECOM, 2017).

The Infrastructure Schedule at Appendix C sets out a significant programme of transport schemes to mitigate the principal transport impacts of planned development in the Submission Local Plan. The development of the former Wisley airfield site will deliver a number transport schemes. As amended by the Draft Local Plan 2017, these schemes are SRN9, SRN10, LRN7, BT2, BT3 and AM3.

New developments that will generate significant amounts of movement will, at the planning application stage, be supported by a Transport Statement or Transport Assessment, and subject to the policy tests in NPPF paragraph 32 and Policy ID3. Individual new

<p>NPPF.</p>	<p>developments may be required to provide mitigation measures additional to those in the Infrastructure Schedule.</p> <p>The justification for the spatial strategy and the allocation of this site are set out in more detail in the Housing Delivery Topic Paper.</p> <p>The site allocation is considered to be of a sufficient scale to be able to support a range of uses and associated infrastructure to ensure the site is sustainable. The site area is large enough to accommodate the proposed number of homes and supporting uses.</p>
<p><i>Adverse impact on rail stations at Horsley and Effingham Junction:</i></p> <ul style="list-style-type: none"> • Adverse impact on rail stations at Horsley and Effingham Junction in terms of limited car parking and crowded rail services. • Needs a rail station nearby before any housing as existing rail stations cannot support growth and if new residents used stations in Elmbridge this will increase congestion and pollution. 	<p>The Infrastructure Schedule at Appendix C sets out a significant programme of transport schemes to mitigate the principal transport impacts of planned development in the Submission Local Plan. The development of the former Wisley airfield site will deliver a number transport schemes including the following schemes which will support the use of rail services and mitigate the adverse impacts on the rail stations at Horsley and Effingham Junction:</p> <ul style="list-style-type: none"> • BT2 'Bus interchange at Effingham Junction rail station (or alternatively Horsley rail station)' • BT3 'Significant bus network serving the Land at former Wisley airfield site and key destinations including Effingham Junction railway station and/or Horsley railway station, Guildford and Cobham to be provided and secured in perpetuity' • AM3 'Off site cycle network from the Land at former Wisley airfield site to key destinations including Effingham Junction railway station, Horsley railway station/Station Parade and Ripley, with improvements to a level that would be attractive and safe for the average cyclist'. <p>The provision of a bus service from the site to one or more rail stations will reduce the need for additional parking at the stations and with additional stops may create opportunities for existing commuters to switch to the bus.</p>

New slip roads:

- Ineffective mitigation

Will increase traffic on the A247

Schemes SRN9 and SRN10 are being promoted to mitigate the impact of the level of strategic planned growth and in particular the development traffic flows resulting from the development of a new settlement at the former Wisley airfield site (site allocation Policy A35), as well as limiting any increase in traffic joining and leaving the A3 at the Ockham interchange. Requirement (4) for the site allocation Policy A35, as proposed in the Draft Local Plan 2017, is that the two new slip roads are the identified mitigation to address the impacts on Ripley High Street and surrounding rural roads.

The A247 is an A-road. The DfT has defined A-roads as 'major roads intended to provide large-scale transport links within or between areas' (DfT, January 2012: p.6). Surrey County Council, as the Local Highway Authority, is responsible for maintenance and improvement, of adopted local roads, which collectively comprise the Local Road Network, including the A247.

The Guildford Borough Proposed Submission Local Plan "June 2016": Strategic Highway Assessment Report (Surrey CC, June 2016) (indicates that additional mitigation may need to be considered on the A247, due to the cumulative impact coupled with re-routing (paragraph 4.5.3).

It is considered that the A247 can be improved as necessary in order to maintain its safe operation and performance. Scheme LRN20 'A247 Send Road/Send Barns Lane (Send) traffic management and environmental improvement scheme' is included in the Infrastructure Schedule.

In addition, the Submission Local Plan provides the planning policy framework to allow for the consideration of such additional mitigation either through the development management process for planning applications, having regard particularly to Policy ID3 at point (7), or through any updates to the Infrastructure Schedule provided in the

	latest Guildford borough Infrastructure Delivery Plan, as provided for in Policy ID1 at point (4) and in Policy ID3 at point (8).
<p><i>Adverse impact on air quality:</i></p> <ul style="list-style-type: none"> • NO_x levels are close to or above the legal limit so air pollution would be an issue. <p>High pollution recorded near M25 Junction 10/A3 Wisley interchange.</p> <p>Questions the legality of this site.</p> <p>Acid deposition on Thames Basin Heaths SPA and on the RHS Garden Wisley.</p> <p>Adverse impact on the Cobham AQMA.</p> <p>Environmental statement submitted in support of planning application was not robust.</p>	<p>AECOM undertook an Air Quality Review of the Draft Local Plan (June 2017). This qualitative risk based review considered the risk of significant air quality effects – in terms of annual mean concentrations of NO₂, PM₁₀ and PM_{2.5} – occurring with the implementation of the Draft Local Plan based on the size and nature of anticipated developments, their location, ambient air quality around potential developments and the locations of sensitive receptors – including residential properties, schools and hospitals – to air quality around potential developments.</p> <p>For NO₂, the findings suggest that the effect of the Draft Local Plan on annual mean NO₂ concentrations will be negligible and not a key constraint on development in the majority of the borough. Further detailed modelling was recommended as being advisable around roads where notable changes in traffic flows are predicted, at locations in close proximity to sensitive receptors, albeit in each case it was considered unlikely that these development-related increases would lead to an exceedance of the air quality objective.</p> <p>For particulate matter – both PM₁₀ and PM_{2.5} – negligible effects are anticipated at all sensitive receptors for air quality.</p> <p>It was also recommended that the findings of the Air Quality Review be confirmed as part of the planning application processes for specific sites, and accordingly potential air quality issues has been added as a ‘key consideration’ for policies A24 Slyfield Area Regeneration Project, A25 Gosden Hill Farm, A26 Blackwell Farm and A29 Land to the south and east of Ash and Tongham.</p> <p>The potential effect on European designated ecological sites such as the SPA is considered in detail within the Habitat Regulations</p>

	<p>Assessment (2017).</p> <p>The Council also manages local air quality through the Local Air Quality Management regime. At present, there are no Air Quality Management Areas (AQMA) in the borough, although an AQMA covering a small area in the village of Compton may be designated shortly, subject to the outcome of a consultation with affected residents. If an AQMA is designated, the Council will put together a Local Air Quality Action Plan to improve the air quality in this area.</p>
<p><i>Environment:</i></p> <ul style="list-style-type: none"> Loss of agricultural land including a high proportion of BMV agricultural land 	<p>Whilst the NPPF seeks to direct development towards areas of poorer agricultural quality, this does need to be balanced with other considerations. The SA assesses the impact of the spatial strategy on agricultural land (section 10.10).</p>
<p><i>Ecology:</i></p> <ul style="list-style-type: none"> Impact on the SNCI <p>Proposed SANG within 400m buffer zone will harm SPA</p>	<p>Whilst the expanded SNCI area remains the recommendation of the Local Sites Partnership following a resurvey, the areas of ecological value are concentrated on limited parts of the site. Development of the site is therefore still considered to be compatible with the designation. The design of the site will need to accord to Policy ID4.</p> <p>Natural England consider the package of measures being proposed mitigate the impact of the appeal site on the SPA. Natural England also agree in principle to additional SANG to mitigate further potential development to the south of the appeal site which forms part of A35.</p>
<ul style="list-style-type: none"> The Wisley allocation refers to a bespoke SANG to mitigate rather than avoid adverse effects on the SPA, this wording is inconsistency when comparing the general policy within the Plan (P5) and this specific policy. Policy A35 is not setting out the correct tests, and is inconsistent with Policy P5's approach which seeks to adequately to avoid impacts on the SPA via a properly located and designed SANG. 	<p>This correction has been added to the minor amendments schedule.</p>

<p><i>Historic environment:</i></p> <ul style="list-style-type: none"> • Proposal would have an adverse impact on historic setting of Ockham Village, listed buildings and conservation area 	<p>The allocation refers to the setting of listed buildings and the conservation area within the key considerations. The Council considers that any impact can be mitigated through sensitive design.</p>
<p><i>Scale/density:</i></p> <ul style="list-style-type: none"> • The density proposed is too high. <p>The scale of development is disproportionate to the character of the area.</p>	<p>The site area is larger than the appeal site and has been increased further still. The approximate capacity of the site has remained the same though, acknowledging that the density and design of the appeal scheme is not considered appropriate.</p> <p>The site allocation is for a new settlement. As such, it needs to be of a sufficient scale to ensure it is capable of being made sustainable. We consider 2,000 homes achieves the mix of uses and supporting infrastructure necessary to achieve this.</p>
<p><i>Deliverability:</i></p> <ul style="list-style-type: none"> • Not deliverable in 5 years due to beacon and other infrastructure constraints • Site will take longer than plan period to deliver 	<p>It is only assumed that the site will begin to deliver homes three years after the expected adoption of the plan. The phasing of the site will be linked to the delivery of necessary infrastructure. We consider that there is sufficient certainty that the necessary infrastructure will be delivered in time to enable the site to be completed within the plan period.</p>

A36 Hotel, Guildford Road, East Horsley

Main Issue	Guildford Borough Council Response
<p><i>Representations from Prescribed Bodies and Selected Stakeholders</i></p>	
<p>Site promoter</p> <ul style="list-style-type: none"> Site allocation should be retained on the basis that it may facilitate the expansion/improvement/diversification of the hotel to make it viable as enabling development, or retain the allocation to enable the redevelopment of the hotel site, should further evidence justify the loss of the hotel. 	<p>The site falls within the proposed inset boundary of the village. For this reason, should further evidence be prepared to adequately justify the loss or diversification of the hotel, then this would not be restricted by Green Belt policy. The Council therefore considers that an allocation is not appropriate given the current uncertainty. However, it could nevertheless come forward as a windfall site during the plan period.</p>
<ul style="list-style-type: none"> Object to the removal of the site allocation as it is contrary to the brownfield first policy and is in a sustainable location. Previously developed sites should be maximised to reduce reliance on greenfield sites. 	<p>Whilst we continue to maximise previously developed land in meeting our housing need it is important that we continue to protect land that meets other needs to ensure that we retain sustainable and vibrant communities.</p>

A37 Land at and to the rear of Bell and Colvill, Epsom Road, West Horsley

Main Issue	Guildford Borough Council Response
<i>Representations on Specific Issues</i>	
<p><i>Green Belt:</i></p> <ul style="list-style-type: none"> Should be retained as Green Belt. <p>No exceptional circumstances for the site.</p>	<p>The site was identified as part of the inset area within the GBCS. The exceptional circumstances that justify removing it from the Green Belt are set out in the Green Belt and Countryside Topic Paper.</p>
<ul style="list-style-type: none"> Adverse impact on infrastructure 	<p>This is addressed in more detail under Policy ID1 and Appendix C: infrastructure schedule.</p>
<ul style="list-style-type: none"> Harm to the rural character of the area 	<p>Policy D4 includes requirements for the character and design of all new development. It also includes a set of specific considerations for development within villages. This will help shape development proposals to ensure they respect the context of their rural location.</p>
<p><i>Transport:</i></p> <ul style="list-style-type: none"> Unsafe vehicle access / junction. <p>Speeding is a local problem.</p> <p>Will increase traffic.</p> <p>Inadequate pavements / not safe for pedestrian access.</p>	<p>There are a number of existing access points to the site area currently in use by the garage and the existing dwellings direct from A246, which could be rationalised as part of redevelopment proposals. The proposed residential access could be configured to ensure that traffic uses the designated one-way system along the parallel road adjacent to A246 to egress the site via the junction to the north (shared with Cranmore School). There is also the potential to provide an access to the site from The Street.</p> <p>It is considered that, at the planning application stage, an applicant will be able to demonstrate the safe operation and performance of the Local Road Network, either as existing or improved as necessary.</p>

Scheme LRN22 is included in the Infrastructure Schedule in recognition that the housing development around East and West Horsley will have a material impact on local roads including B2039 and East Lane. It is envisaged that money will be taken from future developments for site allocation policies A37, A38, A39 and A40 through Section 106 agreements in order to mitigate the traffic and environmental impacts of these developments or alternatively the scheme will be funded through CIL.

Draft

A38 Land to the west of West Horsley

Main Issue	Guildford Borough Council Response
<p>Representations from Prescribed Bodies and Selected Stakeholders</p>	
<p>Thames Water</p> <ul style="list-style-type: none"> Wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. <p>Upgrades required – can take 18 months to 3 years to deliver.</p> <p>Detailed drainage strategy and planning condition required.</p>	<p>Policy ID1 is targeted to ensure the timely provision of infrastructure necessary to support new development. At the site level, any planning permission may be subject to a Grampian planning condition, preventing occupation until any necessary upgrades have been made.</p>
<p>Site promoter</p> <ul style="list-style-type: none"> Site capacity should be expressed as a minimum. <p>Object to the allocation of some self-build and custom house building plots. The Government has indicated a commitment to self-build and custom house building plots but have not yet issued policy in relation to the initiative. Government guidance at the time of determining a planning application would be a material consideration that will be looked at as part of the planning balance. We therefore object to the inclusion of this clause as this stage as being premature and pre-empting confirmation of the Government’s future policy.</p>	<p>The exact capacity of a site will vary on a case-by-case basis through more detailed consideration in the planning application stage. The use of the word “approximately” is considered appropriate as it gives sufficient flexibility for this to occur.</p> <p>The Self-Build and Custom Housebuilding Act 2015 as amended by the Housing and Planning Act 2016 place a duty on local authorities to give suitable development permission for enough serviced plots of land to meet the demand for self-build and custom housebuilding in their area. Planning Practice Guidance (July 2017) has been recently updated to give further Government guidance. The Council can meet these duties and the demand for self-build and custom housebuilding in Guildford by requiring the provision of suitable plots on larger housing sites through the Local Plan. It is an approach also taken by other local authorities with emerging or adopted Local Plans.</p>

<p><i>Green Belt:</i></p> <ul style="list-style-type: none"> Should be retained as Green Belt. <p>No exceptional circumstances for the site.</p>	<p>The site was identified as a potential development area in the GBCS. The exceptional circumstances that justify removing it from the Green Belt are set out in the Housing Delivery Topic Paper.</p>
<ul style="list-style-type: none"> Adverse impact on infrastructure 	<p>This is addressed in more detail under Policy ID1 and Appendix C: infrastructure schedule.</p>
<p><i>Transport:</i></p> <ul style="list-style-type: none"> Unsafe vehicle access / junction. <p>Speeding is a local problem.</p> <p>Will increase traffic.</p> <p>Inadequate pavements / not safe for pedestrian access.</p> <p>Limited parking at shops and station in East Horsley.</p>	<p>Vehicular access to the proposed site could be provided from both East Lane and Long Reach in the position of the existing accesses. It is noted that the existing access from East Lane is narrow and only allows single file traffic. However, the ownership extends beyond the boundary of the existing access road and there is the potential to widen the access to allow two way traffic flows and a separate pedestrian footway. East Lane is subject to a 30 mph speed limit and there are is footway provision on the north side of the road. It is considered that this access would be the main pedestrian and cyclist route as it provides the most direct access to local facilities.</p> <p>There is also potential to widen the existing access onto Long Reach although this road is subject to a 40 mph speed limit and does not have a dedicated footway.</p> <p>It is considered that, at the planning application stage, an applicant will be able to demonstrate the safe operation and performance of the Local Road Network, either as existing or improved as necessary.</p> <p>Scheme LRN22 is included in the Infrastructure Schedule in recognition that the housing development around East and West Horsley will have a material impact on local roads including B2039 and East Lane. It is envisaged that money will be taken from future developments for site allocation policies A37, A38, A39 and A40 through Section 106 agreements in order to mitigate the traffic and environmental impacts of these developments or alternatively the scheme will be funded through CIL.</p>

A39 Land near Horsley railway station, Ockham Road North, East Horsley

Main Issue	Guildford Borough Council Response
<p>Representations from Prescribed Bodies and Selected Stakeholders</p>	
<p>Site promoter</p> <ul style="list-style-type: none"> The self-build plots should only be required if the site achieves a capacity of 100 or more homes 	<p>New Government legislation requires Councils to give suitable development permission for enough serviced plots of land to meet the demand for self-build and custom housebuilding in their area. We can best support and meet the demand for self-build and custom housebuilding in Guildford by requiring the provision of suitable plots on larger housing sites through the Local Plan. This site is considered suitable for self-build plots and the issue will be considered in detail at the planning application stage.</p>
<p>Natural England</p> <ul style="list-style-type: none"> This site is adjacent to ancient woodland. The policies should ensure that any direct or indirect impacts on these sites are avoided or mitigated. 	<p>The presence of ancient woodland is listed within the site allocation. Appropriate mitigation will be considered as part of the planning application process.</p>
<p>Thames Water</p> <ul style="list-style-type: none"> Wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. <p>Upgrades required – can take 18 months to 3 years to deliver.</p> <p>Detailed drainage strategy and planning condition required.</p>	<p>Policy ID1 is targeted to ensure the timely provision of infrastructure necessary to support new development. At the site level, any planning permission may be subject to a Grampian planning condition, preventing occupation until any necessary upgrades have been made.</p>

<p>Environment Agency <i>Sites A39, A40, A50 and A54:</i></p> <ul style="list-style-type: none"> The new climate change allowances haven't been specifically mentioned in the Level 2 SFRA or local plan. However, the majority of allocated sites have detailed modelling where the 1 in 1000 year (0.1% annual exceedance probability) is available, these sites have been assessed against the 1 in 1000 year flood. For the purpose of accuracy and clarity we recommend that this approach of using the 1 in 1000 year flood event to account for climate change is clearly set out in the SFRA Level 2. <p>If these sites are adopted, at the planning application stage we would expect an assessment of climate change (using the new allowances) to be undertaken by applicants. We recommend applicants consult with the most recent national climate change guidance including our Thames Climate change guidance.</p>	<p>The Council has prepared an addendum to update the May 2016 Level 2 SFRA. This sets out the approach to which the respondent refers, to show that the SFRA took account of climate change in line with Planning Practice Guidance on Flood Risk and Coastal Change, published March 2014.</p> <p>The addendum has also taken on board the respondent's second suggestion by including a recommendation that potential applicants consult the more recent climate change guidance before submitting a proposal if a site is liable to be affected and to provide evidence that they have done so in a site-specific flood risk assessment. The site allocations policies refer to the need for applicants to have regard to the recommendations of the Level 2 SFRA.</p>
<p>Responses to Specific Issues</p>	
<p><i>Green Belt:</i></p> <ul style="list-style-type: none"> Should be retained as Green Belt. <p>No exceptional circumstances for the site.</p>	<p>The site was not identified as a potential development area in the GBCS on the basis that it did not have access. Two properties are proposed to be demolished in order to gain access. The site does not contribute to the openness of the Green Belt given its location behind housing, woodland and an embanked railway line. It is also very sustainably located within easy reach of a district centre and rail station. These constitute the exceptional circumstances to remove this site from the Green Belt.</p>
<ul style="list-style-type: none"> Adverse impact on infrastructure 	<p>This is addressed in more detail under Policy ID1 and Appendix C: Infrastructure Schedule.</p>

<p><i>Flooding:</i></p> <ul style="list-style-type: none"> • Site within a flood risk area. <p>Access crosses land designated as flood plain.</p> <p>Drainage / surface water flooding.</p>	<p>The allocation addresses these issues within the requirements. This has been assessed in the SFRA and through the Sequential Test.</p>
<p><i>Transport:</i></p> <ul style="list-style-type: none"> • Unsafe vehicle access / junction. <p>Speeding is a local problem.</p> <p>Will increase traffic.</p> <p>Inadequate pavements / not safe for pedestrian access.</p> <p>Insufficient parking at shops.</p> <p>Station parking.</p>	<p>Access to the site would be off Ockham Road North and would be achieved through the demolition of Chicane and Quintons residential properties.</p> <p>It is considered that, at the planning application stage, an applicant will be able to demonstrate the safe operation and performance of the Local Road Network, either as existing or improved as necessary.</p> <p>Scheme LRN22 is included in the Infrastructure Schedule in recognition that the housing development around East and West Horsley will have a material impact on local roads including B2039 and East Lane. It is envisaged that money will be taken from future developments for site allocation policies A37, A38, A39 and A40 through Section 106 agreements in order to mitigate the traffic and environmental impacts of these developments or alternatively the scheme will be funded through CIL.</p> <p>The site is within close proximity to Horsley train station.</p>
<p><i>Highway and pedestrian safety issues due to:</i></p> <ul style="list-style-type: none"> • railway bridge, <p>narrow road and pedestrian footpath, and</p> <p>proposed access.</p>	<p>A review of access arrangements will be required as part of planning application.</p> <p>It is considered that, at the planning application stage, an applicant will be able to demonstrate the safe operation and performance of the Local Road Network, either as existing or improved as necessary.</p>

A40 Land to the north of West Horsley

Main Issue	Guildford Borough Council Response
<p>Representations from Prescribed Bodies and Selected Stakeholders</p>	
<p>Thames Water</p> <ul style="list-style-type: none"> Wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. <p>Upgrades required – can take 18 months to 3 years to deliver.</p> <p>Detailed drainage strategy and planning condition required.</p>	<p>Policy ID1 is targeted to ensure the timely provision of infrastructure necessary to support new development. At the site level, any planning permission may be subject to a Grampian planning condition, preventing occupation until any necessary upgrades have been made.</p>
<p>Site promoter</p> <ul style="list-style-type: none"> Concerned by the inclusion of the element of self-build and custom house building plots within the allocation. The inclusion of this is not based on any evidence formally published which suggests that there is a need or demand for these plots on this site. Persimmon Homes fully intend to build out the dwellings themselves using their own resources. It is unclear as to where these self-build and custom plots would be located. 	<p>The Self-Build and Custom Housebuilding Act 2015 as amended by the Housing and Planning Act 2016 are concerned with increasing the availability of land for self and custom housebuilding. They place a duty on relevant authorities to grant planning permission etc and a duty with regard to registers. Government Planning Practice Guidance (July 2017) has been recently updated to give further Government guidance. The Council needs to allocate sites for self-build and custom housebuilding in order to meet these duties.</p>

Representations on Specific Issues	
<p>Green Belt:</p> <ul style="list-style-type: none"> • Should be retained as Green Belt. <p>No exceptional circumstances for the site.</p>	<p>The site was identified as a potential development area in the GBCS. The exceptional circumstances that justify removing it from the Green Belt are set out in the Housing Delivery Topic Paper.</p>
<p>Flooding:</p> <ul style="list-style-type: none"> • Site regularly floods. • Access through flood zone. • Drainage and surface water flooding. 	<p>The allocation addresses these issues within the requirements. This has been assessed in the SFRA and through the Sequential Test.</p>
<p>Sites A39, A40, A50 and A54:</p> <ul style="list-style-type: none"> • The new climate change allowances have not been specifically mentioned in the Level 2 SFRA or local plan. However, the majority of allocated sites have detailed modelling where the 1 in 1000 year (0.1% annual exceedance probability) is available, these sites have been assessed against the 1 in 1000 year flood. For the purpose of accuracy and clarity we recommend that this approach of using the 1 in 1000 year flood event to account for climate change is clearly set out in the SFRA Level 2. • If these sites are adopted, at the planning application stage we would expect an assessment of climate change (using the new allowances) to be undertaken by applicants. We recommend applicants consult with the most recent national climate change guidance including our Thames Climate change guidance. 	<p>The Council has prepared an addendum to update the May 2016 Level 2 SFRA. This sets out the approach to which the respondent refers, to show that the SFRA took account of climate change in line with Planning Practice Guidance on Flood Risk and Coastal Change, published March 2014.</p> <p>The addendum has also taken on board the respondent's second suggestion by including a recommendation that potential applicants consult the more recent climate change guidance before submitting a proposal if a site is liable to be affected and to provide evidence that they have done so in a site-specific flood risk assessment. The site allocations policies refer to the need for applicants to have regard to the recommendations of the Level 2 SFRA.</p>

<p><i>Transport:</i></p> <ul style="list-style-type: none"> • Unsafe vehicle access / junction. • Speeding is a local problem. • Will increase traffic. • Inadequate pavements / not safe for pedestrian access. 	<p>The principal vehicular and pedestrian access to the site would be achieved off the existing junction with Ockham Road North. There is the potential to provide a pedestrian/cycle link and even serve a small number of dwellings from Green Lane. The existing access road will need to be widened to accommodate two-way movement of vehicles as well as providing a narrow footway.</p> <p>There may be an opportunity to extend the existing 30mph speed limit past the site access.</p> <p>It is considered that, at the planning application stage, an applicant will be able to demonstrate the safe operation and performance of the Local Road Network, either as existing or improved as necessary.</p> <p>Scheme LRN22 is included in the Infrastructure Schedule in recognition that the housing development around East and West Horsley will have a material impact on local roads including B2039 and East Lane. It is envisaged that money will be taken from future developments for site allocation policies A37, A38, A39 and A40 through Section 106 agreements in order to mitigate the traffic and environmental impacts of these developments or alternatively the scheme will be funded through CIL.</p>
<ul style="list-style-type: none"> • Adverse impact on infrastructure. 	<p>This is addressed in more detail under Policy ID1 and the Appendix C: Infrastructure Schedule.</p>
<ul style="list-style-type: none"> • Harm to the rural character of the area. 	<p>Policy D4 includes requirements for the character and design of all new development. It also includes a set of specific considerations for development within villages. This will help shape development proposals to ensure they respect the context of their rural location.</p>

A41 Land to the south of West Horsley

Main Issue	Guildford Borough Council Response
<p>Responses from Prescribed Bodies and Selected Stakeholders</p>	
<p>Thames Water</p> <ul style="list-style-type: none"> Wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. <p>Upgrades required – can take 18 months to 3 years to deliver.</p> <p>Detailed drainage strategy and planning condition required.</p>	<p>This site has been removed from the plan due to the uncertainty regarding the deliverability of the new proposal to relocate the Raleigh School onto this site.</p>
<ul style="list-style-type: none"> Support the relocation of the Raleigh School onto this site and building houses on the current site of The Raleigh School and on Weston Lea. 	<p>This site was proposed to be allocated for housing. The site is no longer proposed to be removed from the Green Belt and allocated due to the uncertainty regarding the deliverability of the new proposal to relocate the Raleigh School onto this site. Further justification for this is set out in the Housing Delivery Topic Paper.</p>
<p>Site promoter</p> <ul style="list-style-type: none"> The relocation of the school is viable when taking account of the value released from the existing two sites, SCC education contributions and the housing proposed on the site. Site should be put back into the plan. 	<p>Surrey County Council is not looking to expand the school currently. They are also not in a position to support or progress the relocation. For these reasons, the exceptional circumstances to justify its removal from the green Belt do not exist.</p>
<ul style="list-style-type: none"> Current school is not fit for purpose and the Council should be supporting its replacement. 	<p>Surrey County Council is the Education Authority. They are not supporting or progressing the relocation of the school.</p>

A42 Clockbarn Nursery, Tannery Lane, Send

Main Issue	Guildford Borough Council Response
Representations from Prescribed Bodies and Selected Stakeholders	
National Trust <ul style="list-style-type: none"> Design must have due regard to the setting and amenity of the River Wey and the Conservation Area. 	A requirement has been added: To respect views from the River Wey Navigation.
Site promoter <ul style="list-style-type: none"> Site capacity should be increased – efficient use of land and pre-app discussions ongoing. 	Capacity has been increased to approximately 60 homes based on pre-app discussions.
<ul style="list-style-type: none"> Site capacity should be increased further as it still represents inefficient use of the site 	The exact capacity of a site will be considered in more detail in the planning application stage. The use of the word “approximately” is considered appropriate as it gives sufficient flexibility for this to occur.
Representations on Specific Issues	
Transport: <ul style="list-style-type: none"> Vehicles would use Tannery Lane /Papercourt Lane, which are single access as a shortcut through to Ripley. <p>Will increase traffic.</p> <p>Narrow roads with cars parked along.</p>	<p>The delivery of new slips roads to / from the A3 at Burnt Common (schemes SRN9 and SRN10) will result in traffic from Woking and other locations north of the A3 using the A247 through Send to access the A3. This will mean less traffic using minor roads such as Tannery Lane and Papercourt Lane.</p> <p>It is considered that, at the planning application stage, an applicant will be able to demonstrate the safe operation and performance of the Local Road Network, either as existing or improved as necessary.</p>
<ul style="list-style-type: none"> Adverse impact on infrastructure. 	This is addressed in more detail under Policy ID1 and Appendix C: Infrastructure Schedule.

<ul style="list-style-type: none">• Adverse impact on biodiversity.	This is addressed as part of ID4 which requires proposals to demonstrate how they will deliver net gains where possible.
<ul style="list-style-type: none">• Increase in capacity is not compatible with respecting the views from the River Wey.	The Council considers that good quality design is not incompatible with respecting views from the River Wey.

Draft

A43 Land at Garlick's Arch

Main Issue	Guildford Borough Council Response
<p>Representations from Prescribed Bodies and Selected Stakeholders</p>	
<p>Surrey County Council</p> <ul style="list-style-type: none"> Under the column headed "Requirements," please add the following bullet points: <ol style="list-style-type: none"> 1) "Main vehicular access via a new roundabout on A247 frontage, to also provide fourth arm for proposed A3 on slip." 2) "Permeability/ connectivity for pedestrians/ cyclists to B2215 Portsmouth Road." 	<p>The Council recommends that the following minor amendments are made to the plan by amending requirement (5) and adding a requirement (6) as follows:</p> <p><u>(5) Design and site layout to take full account of Policy A43a, including main vehicular access to the site being provided on the A247 frontage</u></p> <p><u>(6) Provide permeability for pedestrians and cyclists to the B2215 Portsmouth Road.</u></p>
<p>Highways England</p> <ul style="list-style-type: none"> In its representation on the Draft Local Plan 2016 dated 18 July 2016, Highway England stated, under headings referencing both Policy A43 and Policy A43a, that the proposed new north facing slip roads to/from A3 at Send Marsh/Burnt Common is 'not considered Justified, Effective, or "sound" in line with the NPPF', in the basis that the following have not been demonstrated: <ul style="list-style-type: none"> the need for the schemes, in line with the requirements of DfT Circular 02/2013; that the schemes and associated infrastructure can be delivered safely without compromising traffic flow along the A3; and, the financial deliverability of the schemes. <p>Recommended 'that for Policy A43 to be Effective and</p>	<p>Following a meeting on 1 September 2016 to explain and clarify the approach taken to this matter in the Draft Local Plan 2016, Highways England, in a letter dated 5 October 2016, noted that:</p> <p>'It remains unclear if these proposals are deliverable and what the conditional requirements are to enable the proposals to progress. It is not clear if proposals set out in A43 are dependent on Guildford's aspirations set out in A43a. To date, we do not have any evidence that such an improvement is deliverable and in conformity with the Design Manual for Roads and Bridges. We welcome further discussions on these policies.'</p> <p>Guildford Borough Council notes that the requirements to enable the site to progress, as amended in the Draft Local Plan 2017, plus minor modifications for the Submission Local Plan, are listed under</p>

<p>“sound” in accordance with the NPPF’, the addition of a new Requirement as follows: ‘Planning permission will not be granted for this site until it has been demonstrated how the adverse impacts to the safe and efficient operation of the local and strategic road networks will be mitigated or if delivery of the site compromises the delivery of emerging improvements.’</p>	<p>‘Requirements’ in Policy A43a.</p> <p>Guildford Borough Council considers that schemes SRN9 and SRN10, allocated in Policy A43a, are deliverable. Work is ongoing to demonstrate the Council’s position.</p>
<p>Highways England</p> <ul style="list-style-type: none"> In its representation on the Draft Local Plan 2017, under headings referencing policies A35, A43, A43a, A58, Appendix C and the Transport topic paper, stated that: ‘As stated in our letter dated 5 October 2017, it remains unclear if the two new slip roads at A247 Clandon Road (Burnt Common) are deliverable and what the conditional requirements are to enable the proposals to progress. It is not clear if proposals set out in Policy A43 (and now additionally Policy A58 and A35) are dependent on GBC’s aspirations set out in A43a. Appendix C Infrastructure Schedule notes that the Burnt Common slip road scheme will be wholly developer funded. To date we do not have any evidence that such an improvement is deliverable and could be designed in conformity with the Design Manual for Roads and Bridges. We would welcome further discussions on these policies. <p>We understand that the Wisley Airfield site is expected to go to Planning Appeal in September 2017 which will likely have implications for the soundness of these policies, therefore discussions are urgent if proposals are reliant upon the improvement set out in A43A [sic] that is being promoted by Guildford Borough Council and Surrey County Council.’ [Second paragraph in text box in the original.]</p>	<p>Schemes SRN9 and SRN10, allocated in Policy A43a, are being promoted to mitigate the impact of the level of strategic planned growth and in particular the development traffic flows resulting from the development of a new settlement at the former Wisley airfield site (Policy A35), as well as limiting any increase in traffic joining and leaving the A3 at the Ockham interchange. Requirement (4) for the site allocation Policy A35, as proposed in the Draft Local Plan 2017, is that the two new slip roads are the identified mitigation to address the impacts on Ripley High Street and surrounding rural roads.</p> <p>The Council considers that site allocation Policy A43, as well as Policy A58, are not directly dependent on schemes SRN9 and SRN10, allocated in Policy A43a. Rather, as stated above, the Council has planned on the basis that these schemes will be delivered by the developer of the former Wisley airfield site (Policy A35) and that this will be ‘when first needed to serve the development’s occupants and users and/or to mitigate its otherwise adverse material impacts’ (Policy ID1 at point (1)).</p> <p>In producing a new Local Plan for its area, Guildford Borough Council as the local planning authority is required to allocate sites for development (NPPF, 2012: paragraph 157) and to assess the quality and capacity of infrastructure for transport and its ability to meet forecasts (NPPF, 2012: paragraph 162). The Submission Local Plan’s spatial strategy and key infrastructure schemes, as included in the Infrastructure Schedule, have been planned together and are</p>

	<p>interdependent in various ways. In short, the spatial strategy as proposed is dependent on the key infrastructure schemes as proposed.</p> <p>Guildford Borough Council considers that schemes SRN9 and SRN10, allocated in Policy A43a, are deliverable. Work is ongoing to demonstrate the Council's position.</p>
<p>Natural England</p> <ul style="list-style-type: none"> The site is adjacent to ancient woodland. The policies should ensure that any direct or indirect impacts on these sites are avoided or mitigated. 	<p>The presence of ancient woodland is listed as a key consideration. Appropriate mitigation will be considered as part of the planning application process.</p>
<p>Site promoter</p> <ul style="list-style-type: none"> 2 ha that was previously allocated for employment is now available for an alternative use – more housing/ care home/ employment. <p>The allocation of 6 travelling Showpeople is not justified.</p>	<p>Allocation of 6 Travelling Showpeople plots is necessary to meet need, as evidenced by the Traveller Accommodation Assessment 2017.</p> <p>The requirement for traveller accommodation on sites of 500 dwellings or more is in addition to the allocated sites to ensure sufficient sites are provided to meet identified need. It will guide future planning applications. Site allocations have been considered individually and decisions made on their inclusion within the Local Plan on a case by case basis. Site A43 Garlicks Arch was allocated on the basis that it would provide 6 Travelling Showpeople plots.</p>

<p>Thames Water</p> <ul style="list-style-type: none"> Wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. <p>Upgrades required – can take 18 months to 3 years to deliver.</p> <p>Detailed drainage strategy and planning condition required.</p>	<p>Policy ID1 is targeted to ensure the timely provision of infrastructure necessary to support new development. At the site level, any planning permission may be subject to a Grampian planning condition, preventing occupation until any necessary upgrades have been made.</p>
<p><i>Representations on Specific Issues</i></p>	
<p><i>Green Belt:</i></p> <ul style="list-style-type: none"> Should be retained as Green Belt. <p>No exceptional circumstances for the site.</p>	<p>The site was identified as a potential development area in the GBCS. The exceptional circumstances that justify removing it from the Green Belt are set out in the Housing Delivery Topic Paper.</p>
<p><i>Employment floorspace:</i></p> <ul style="list-style-type: none"> There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing [brownfield] industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. <p>There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. Burnt Common was removed from the Plan without any reasoning.</p>	<p>The site at Garlick’s Arch is now allocated for residential development and the employment floorspace has been reallocated to the Burnt Common site.</p> <p>This 30ha site to the east of Burnt Common Lane, south of Portsmouth Road, and north of the A3 was allocated for 400 homes (to help meet early delivery) and 7,000 sqm of industrial floorspace. The swap to this site from Burnt Common was intended to lessen perceived issues of coalescence with the Gosden Hill Farm urban extension and facilitated the delivery of the new slip roads. This decision was reviewed and whilst the Garlick’s Arch site will provide residential use, the employment use is now being provided on Burnt Common (Site A58).</p>

	<p>Retaining the residential element on Land at Garlick’s Arch means the site can continue to facilitate the provision of a northbound on and a southbound off slip road onto the A3 from the A247, which will provide significant improvements to the highway network and is fully supported by Surrey County Council. It will also deliver necessary homes in the early years of the plan.</p> <p>The industrial uses that are no longer being met on Garlick’s Arch are now proposed to be met on land around Burnt Common warehouse. This site is also located on medium sensitivity Green Belt and was proposed in the draft Local Plan (2014) for industrial and housing.</p> <p>As set out above, following concerns raised regarding the allocation of industrial uses on Garlick’s Arch, this element of the allocation has been moved in the Regulation 19 Local Plan (2017) to land around Burnt Common warehouse. The site has however been reduced in area to that previously identified in 2014 which addresses the issues related to perceived coalescence.</p> <p>This site is also preferable for industrial development given it already has an element of employment on the site, is separate from residential development and has potential capacity for additional floorspace which could be justified through future borough employment land needs assessments. This provides some flexibility and certainty for future needs given the difficulty in identifying suitable industrial land.</p>
<ul style="list-style-type: none"> • No longer needed as employment need being met on Burnt Common (A58). 	<p>The site is nevertheless providing necessary homes that can be delivered early in the plan period thereby contributing towards the five year housing supply. It is also providing the Travelling Showpeople plots for which there is no other suitable site. The site also facilitates the delivery of the new slip roads at Burnt Common. For these reasons, in spite of the industrial need being met elsewhere, the site remains key to the delivery of our strategy.</p>

<ul style="list-style-type: none"> Capacity of the site is greater than indicated by the allocation. 	<p>The capacity of the site is considered appropriate and is consistent with the assumptions made on other sites. Given the scale of the site a significant part of the site will deliver other facilitating uses such as infrastructure and open space. There are also some constraints on the site including potential noise from the A3 and areas of prone to flooding. The site is also delivering Travelling Showpeople plots. The exact capacity of the site will be assessed as part of the planning application process.</p>
<p><i>Unsuitability of local and strategic roads and the need for mitigation:</i></p> <ul style="list-style-type: none"> Need for traffic calming measures - Speed restrictions, speed cameras or traffic calming measures. <p>Concern regarding traffic impact on the A247 from the new slip road access to / from the A3.</p> <p>Newark Road and Rose Lane in Ripley already suffering from severe congestion.</p> <p>Dangerous junctions including of A247 and A3, B2215 Portsmouth Road and A247 Send Barns Lane, and of A247 Send Road, A247 Send Barns Lane and Send Marsh Road that are not suitable to support increased traffic volumes.</p> <p>A3 leads directly to the Royal Surrey County Hospital; and any gridlock, closures or likely delays could cause problems if ambulances have trouble on route.</p>	<p>The traffic impacts on local and strategic roads are an important consideration.</p> <p>The Guildford Borough Proposed Submission Local Plan “June 2016”: Strategic Highway Assessment Report (Surrey CC, June 2016) (hereafter the SHAR 2016) represents a robust “worst case” in terms of transport demand and supply assumptions, as it does not assess and therefore does not account for the mitigation; including the potential for modal shift, and the new and improved sustainable transport choices provided by the rail, bus and active modes schemes included in the Draft Local Plan 2016 and makes no allowance for any internalisation of trips within the larger sites.</p> <p>The SHAR 2016 concludes that “The results show that for Scenario 5, which represents the quantum and distribution of development proposed in the Proposed Submission Local Plan together with the key highway schemes, there will not be a severe impact on the local and strategic highway network” (p.62). The addendum to the SHAR 2016 (Guildford BC, June 2017) found that this conclusion was “not considered likely to change” as a result of the key changes made to proposed site policies and to the programme of transport schemes in the Draft Local Plan 2017.</p> <p>Highways England is progressing the development of major schemes for the improvement of the A3 in Guildford from the A320 to the A31</p>

	<p>Hog's Back junction, its junction with the M25 motorway and the M25 motorway northwards from this junction, as required by the Road Investment Strategy: for the 2015/16 – 2019/20 Road Period (Department for Transport, March 2015) (hereafter the RIS). These are schemes SRN2, SRN3 and SRN5 respectively in the Infrastructure Schedule.</p> <p>These schemes will support the use of the Strategic Road Network by traffic making longer distance movements.</p> <p>The A247 is an A-road. The DfT has defined A-roads as 'major roads intended to provide large-scale transport links within or between areas' (DfT, January 2012: p.6). Surrey County Council, as the Local Highway Authority, is responsible for maintenance and improvement, of adopted local roads, which collectively comprise the Local Road Network, including the A247.</p> <p>The SHAR 2016 indicates that additional mitigation may need to be considered on the A247, due to the cumulative impact coupled with re-routing (paragraph 4.5.3).</p> <p>It is considered that the A247 can be improved as necessary in order to maintain its safe operation and performance. Scheme LRN20 'A247 Send Road/Send Barns Lane (Send) traffic management and environmental improvement scheme' is included in the Infrastructure Schedule.</p> <p>Schemes SRN9 and SRN10 are being promoted to mitigate the impact of the level of strategic planned growth and in particular the development traffic flows resulting from the development of a new settlement at the former Wisley airfield site (site allocation Policy A35), as well as limiting any increase in traffic joining and leaving the A3 at the Ockham interchange. Requirement (4) for the site allocation Policy A35, as proposed in the Draft Local Plan 2017, is that the two new slip roads are the identified mitigation to address the impacts on Ripley</p>
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	<p>High Street and surrounding rural roads.</p> <p>In addition, the Submission Local Plan provides the planning policy framework to allow for the consideration of such additional mitigation either through the development management process for planning applications, having regard particularly to Policy ID3 at point (7), or through any updates to the Infrastructure Schedule provided in the latest Guildford borough Infrastructure Delivery Plan, as provided for in Policy ID1 at point (4) and in Policy ID3 at point (8).</p>
<p><i>Travelling Showpeople:</i></p> <ul style="list-style-type: none"> • No need and unsuitable location. <p>Not consistent with the threshold in H1 (The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Showpeople plots in A43 Garlick's Arch as this development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan).</p>	<p>The Traveller Accommodation Assessment 2017 shows the need for 8 Travelling Showpeople plots over the Local Plan period. Within the Proposed Submission Local Plan 2 plots are allocated at Whittles Drive and the remaining 6 plots are allocated at Garlick's Arch. The requirement for traveller accommodation on sites of 500 dwellings or more is in addition to the allocated sites to ensure sufficient sites are provided to meet identified need. It will guide future planning applications. Site allocations have been considered individually and decisions made on their inclusion within the Local Plan on a case by case basis. Site A43 Garlick's Arch was allocated on the basis that it would provide 6 Travelling Showpeople plots.</p>
<p><i>Environment:</i></p> <ul style="list-style-type: none"> • Adverse impact on ancient woodland and trees. 	<p>The allocation lists ancient woodland as a key consideration. Ancient woodland is protected by national policy.</p>
<ul style="list-style-type: none"> • Adverse impact on biodiversity. 	<p>This is addressed as part of ID4 which requires proposals to demonstrate how they will deliver net gains where possible.</p>
<ul style="list-style-type: none"> • Loss of agricultural land. 	<p>Whilst the NPPF seeks to direct development towards areas of poorer agricultural quality, this does need to be balanced with other considerations. The SA assesses the impact of the spatial strategy on agricultural land (section 10.10).</p>

<p><i>Flooding:</i></p> <ul style="list-style-type: none"> • Site regularly floods. <p>Drainage and surface water flooding.</p>	<p>The allocation addresses these issues within the requirements. This has been assessed in the SFRA and through the Sequential Test.</p>
<ul style="list-style-type: none"> • The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 yet assessed as part of the SFRA as Flood Zone 2. 	<p>The SFRA Level 2 published in May 2016 states that the site is in flood zone 3 (see page 28) and therefore requires the exception test to be passed able to suitably accommodate more vulnerable uses, e.g. residential uses. This is the correct designation for this site as it is the highest risk flood zone for the purpose of sequential testing. The majority of the site however is located within Flood Zone 1 (low risk).</p>
<p><i>Adverse impacts:</i></p> <ul style="list-style-type: none"> • Harm to the rural character of the area. 	<p>Policy D4 includes requirements for the character and design of all new development. It also includes a set of specific considerations for development within villages. This will help shape development proposals to ensure they respect the context of their rural location.</p>
<ul style="list-style-type: none"> • Air quality and noise issues from the A3. 	<p>AECOM undertook an Air Quality Review of the Draft Local Plan (June 2017). This qualitative risk based review considered the risk of significant air quality effects – in terms of annual mean concentrations of NO₂, PM₁₀ and PM_{2.5} – occurring with the implementation of the Draft Local Plan based on the size and nature of anticipated developments, their location, ambient air quality around potential developments and the locations of sensitive receptors – including residential properties, schools and hospitals – to air quality around potential developments.</p>

	<p>For NO₂, the findings suggest that the effect of the Draft Local Plan on annual mean NO₂ concentrations will be negligible and not a key constraint on development in the majority of the borough. Further detailed modelling was recommended as being advisable around roads where notable changes in traffic flows are predicted, at locations in close proximity to sensitive receptors, albeit in each case it was considered unlikely that these development-related increases would lead to an exceedance of the air quality objective.</p> <p>For particulate matter – both PM₁₀ and PM_{2.5} – negligible effects are anticipated at all sensitive receptors for air quality.</p> <p>It was also recommended that the findings of the Air Quality Review be confirmed as part of the planning application processes for specific sites, and accordingly potential air quality issues has been added as a ‘key consideration’ for policies A24 Slyfield Area Regeneration Project, A25 Gosden Hill Farm, A26 Blackwell Farm and A29 Land to the south and east of Ash and Tongham.</p> <p>The potential effect on European designated ecological sites such as the SPA is considered in detail within the Habitat Regulations Assessment (2017).</p> <p>The Council also manages local air quality through the Local Air Quality Management regime. At present, there are no Air Quality Management Areas (AQMA) in the borough, although an AQMA covering a small area in the village of Compton may be designated shortly, subject to the outcome of a consultation with affected residents. If an AQMA is designated, the Council will put together a Local Air Quality Action Plan to improve the air quality in this area.</p> <p>Noise mitigation will be considered at planning application stage.</p>
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- Electricity pylons are a health hazard.

The promoters are proposing possibly burying the pylons. The National Grid cannot support policies or proposals in development plans, which rely on Electric and Magnetic Fields (EMF) and related health concerns as justification to control or direct development. Site level design would consider any appropriate planning and land use response to the location of the existing overhead lines (e.g. their location, which is planned below ground / addressing amenity and operational concerns).

Draft

A43a Land for new north facing slip roads to/from A3 at Send Marsh/Burnt Common

Main Issue	Guildford Borough Council Response
<p>Representations from Prescribed Bodies and Selected Stakeholders</p>	
<p>Surrey County Council</p> <ul style="list-style-type: none"> The site should be extended to provide the necessary land, including highway land, required for roundabouts on either side of the A3. 	<p>Site area amended based on the work done to support the option agreement.</p>
<p>Highways England</p> <ul style="list-style-type: none"> In its representation on the Draft Local Plan 2016 dated 18 July 2016, Highway England stated, under headings referencing both Policy A43 and Policy A43a, that the proposed new north facing slip roads to/from A3 at Send Marsh/Burnt Common is 'not considered Justified, Effective, or "sound" in line with the NPPF', in the basis that the following have not been demonstrated: <ul style="list-style-type: none"> the need for the schemes, in line with the requirements of DfT Circular 02/2013; that the schemes and associated infrastructure can be delivered safely without compromising traffic flow along the A3; and, the financial deliverability of the schemes. <p>Recommended "that for Policy A43a to be Effective and "sound" in accordance with the NPPF":</p> <ul style="list-style-type: none"> The deletion of first bullet points in Requirements. The addition of a new Requirement as follows: 'Proposals must comply in all respects with design 	<p>Following a meeting on 1 September 2016 to explain and clarify the approach taken to this matter in the Draft Local Plan 2016, Highways England, in a letter dated 5 October 2016, noted that:</p> <p>'It remains unclear if these proposals are deliverable and what the conditional requirements are to enable the proposals to progress. It is not clear if proposals set out in A43 are dependent on Guildford's aspirations set out in A43a. To date, we do not have any evidence that such an improvement is deliverable and in conformity with the Design Manual for Roads and Bridges. We welcome further discussions on these policies.'</p> <p>Guildford Borough Council notes that the requirements to enable the site to progress, as amended in the Draft Local Plan 2017, plus minor modifications for the Submission Local Plan, are listed under 'Requirements' in Policy A43a.</p> <p>Guildford Borough Council considers that schemes SRN9 and SRN10, allocated in Policy A43a, are deliverable. Work is ongoing to</p>

<p>standards. Where there would be physical changes to the network, schemes must be submitted to road safety, environmental, and non-motorised user audit procedures, as well as any other assessment appropriate to the proposed development. The Design Manual for Roads and Bridges sets out details of the Secretary of State's requirements for access, design, and audit, with which proposals must conform'.</p>	<p>demonstrate the Council's position.</p>
<p>Highways England</p> <ul style="list-style-type: none"> In its representation on the Draft Local Plan 2017, under headings referencing policies A35, A43, A43a, A58, Appendix C and the Transport topic paper, stated that: 'As stated in our letter dated 5 October 2017, it remains unclear if the two new slip roads at A247 Clandon Road (Burnt Common) are deliverable and what the conditional requirements are to enable the proposals to progress. It is not clear if proposals set out in Policy A43 (and now additionally Policy A58 and A35) are dependent on GBC's aspirations set out in A43a. Appendix C Infrastructure Schedule notes that the Burnt Common slip road scheme will be wholly developer funded. To date we do not have any evidence that such an improvement is deliverable and could be designed in conformity with the Design Manual for Roads and Bridges. We would welcome further discussions on these policies. <p>We understand that the Wisley Airfield site is expected to go to Planning Appeal in September 2017 which will likely have implications for the soundness of these policies, therefore discussions are urgent if proposals are reliant upon the improvement set out in A43A [sic] that is being promoted by Guildford Borough Council and Surrey County Council.' [Second paragraph in text box in the original.]</p>	<p>Schemes SRN9 and SRN10, allocated in Policy A43a, are being promoted to mitigate the impact of the level of strategic planned growth and in particular the development traffic flows resulting from the development of a new settlement at the former Wisley airfield site (Policy A35), as well as limiting any increase in traffic joining and leaving the A3 at the Ockham interchange. Requirement (4) for the site allocation Policy A35, as proposed in the Draft Local Plan 2017, is that the two new slip roads are the identified mitigation to address the impacts on Ripley High Street and surrounding rural roads.</p> <p>The Council considers that site allocation Policy A43, as well as Policy A58, are not directly dependent on schemes SRN9 and SRN10, allocated in Policy A43a. Rather, as stated above, the Council has planned on the basis that these schemes will be delivered by the developer of the former Wisley airfield site (Policy A35) and that this will be 'when first needed to serve the development's occupants and users and/or to mitigate its otherwise adverse material impacts' (Policy ID1 at point (1)).</p> <p>In producing a new Local Plan for its area, Guildford Borough Council as the local planning authority is required to allocate sites for development (NPPF, 2012: paragraph 157) and to assess the quality and capacity of infrastructure for transport and its ability to meet forecasts (NPPF, 2012: paragraph 162). The Submission Local Plan's</p>

	<p>spatial strategy and key infrastructure schemes, as included in the Infrastructure Schedule, have been planned together and are interdependent in various ways. In short, the spatial strategy as proposed is dependent on the key infrastructure schemes as proposed.</p> <p>Guildford Borough Council considers that schemes SRN9 and SRN10, allocated in Policy A43a, are deliverable. Work is ongoing to demonstrate the Council's position.</p>
<p><i>Representations on Specific Issues</i></p>	
<ul style="list-style-type: none"> • Scheme will create additional traffic on the A247 and B2215 through West Clandon, Send and Send Marsh, and local road junctions near to the proposed slip roads are dangerous, including the turnout of Boughton Hall Avenue onto the Portsmouth Road. 	<p>The traffic impacts on local and strategic roads are an important consideration.</p> <p>The Guildford Borough Proposed Submission Local Plan “June 2016”: Strategic Highway Assessment Report (Surrey CC, June 2016) (hereafter the SHAR 2016) represents a robust “worst case” in terms of transport demand and supply assumptions, as it does not assess and therefore does not account for the mitigation; including the potential for modal shift, and the new and improved sustainable transport choices provided by the rail, bus and active modes schemes included in the Draft Local Plan 2016 and makes no allowance for any internalisation of trips within the larger sites.</p> <p>The SHAR 2016 concludes that “The results show that for Scenario 5, which represents the quantum and distribution of development proposed in the Proposed Submission Local Plan together with the key highway schemes, there will not be a severe impact on the local and strategic highway network” (p.62). The addendum to the SHAR 2016 (Guildford BC, June 2017) found that this conclusion was “not considered likely to change” as a result of the key changes made to proposed site policies and to the programme of transport schemes in the Draft Local Plan 2017.</p> <p>The A247 is an A-road. The DfT has defined A-roads as ‘major roads</p>

intended to provide large-scale transport links within or between areas' (DfT, January 2012: p.6). Surrey County Council, as the Local Highway Authority, is responsible for maintenance and improvement, of adopted local roads, which collectively comprise the Local Road Network, including the A247.

The SHAR 2016 indicates that additional mitigation may need to be considered on the A247, due to the cumulative impact coupled with re-routing (paragraph 4.5.3).

It is considered that the A247 can be improved as necessary in order to maintain its safe operation and performance. Scheme LRN20 'A247 Send Road/Send Barns Lane (Send) traffic management and environmental improvement scheme' is included in the Infrastructure Schedule.

Schemes SRN9 and SRN10 are being promoted to mitigate the impact of the level of strategic planned growth and in particular the development traffic flows resulting from the development of a new settlement at the former Wisley airfield site (site allocation Policy A35), as well as limiting any increase in traffic joining and leaving the A3 at the Ockham interchange. Requirement (4) for the site allocation Policy A35, as proposed in the Draft Local Plan 2017, is that the two new slip roads are the identified mitigation to address the impacts on Ripley High Street and surrounding rural roads.

In addition, the Submission Local Plan provides the planning policy framework to allow for the consideration of such additional mitigation either through the development management process for planning applications, having regard particularly to Policy ID3 at point (7), or through any updates to the Infrastructure Schedule provided in the latest Guildford borough Infrastructure Delivery Plan, as provided for in Policy ID1 at point (4) and in Policy ID3 at point (8).

<ul style="list-style-type: none"> Highways England has not consented to the delivery of schemes SRN9 and SRN10. 	<p>Guildford Borough Council considers that schemes SRN9 and SRN10, allocated in Policy A43a, are deliverable. Work is ongoing to demonstrate the Council's position.</p> <p>Schemes SRN9 and SRN10 are being promoted to mitigate the impact of the level of strategic planned growth and in particular the development traffic flows resulting from the development of a new settlement at the former Wisley airfield site (site allocation Policy A35), as well as limiting any increase in traffic joining and leaving the A3 at the Ockham interchange. Highways England's new 'M25 to Solent Route Strategy' (March 2017: p.22) recognises these schemes as follows:</p> <p>'Opportunities have also been identified to the north of Guildford for including ... the introduction of north-facing slips at the A3/A247 at Ripley to support local plan aspirations and relieve some pressure on local roads accessing the A3 at Guildford.'</p>
<ul style="list-style-type: none"> Air quality issues. 	<p>AECOM undertook an Air Quality Review of the Draft Local Plan (June 2017). This qualitative risk based review considered the risk of significant air quality effects – in terms of annual mean concentrations of NO₂, PM₁₀ and PM_{2.5} – occurring with the implementation of the Draft Local Plan based on the size and nature of anticipated developments, their location, ambient air quality around potential developments and the locations of sensitive receptors – including residential properties, schools and hospitals – to air quality around potential developments.</p> <p>For NO₂, the findings suggest that the effect of the Draft Local Plan on annual mean NO₂ concentrations will be negligible and not a key constraint on development in the majority of the borough. Further detailed modelling was recommended as being advisable around roads where notable changes in traffic flows are predicted, at locations in close proximity to sensitive receptors, albeit in each case it was considered unlikely that these development-related increases would</p>

	<p>lead to an exceedance of the air quality objective.</p> <p>For particulate matter – both PM10 and PM2.5 – negligible effects are anticipated at all sensitive receptors for air quality.</p> <p>It was also recommended that the findings of the Air Quality Review be confirmed as part of the planning application processes for specific sites, and accordingly potential air quality issues has been added as a ‘key consideration’ for policies A24 Slyfield Area Regeneration Project, A25 Gosden Hill Farm, A26 Blackwell Farm and A29 Land to the south and east of Ash and Tongham.</p> <p>The potential effect on European designated ecological sites such as the SPA is considered in detail within the Habitat Regulations Assessment (2017).</p> <p>The Council also manages local air quality through the Local Air Quality Management regime. At present, there are no Air Quality Management Areas (AQMAs) in the borough, although an AQMA covering a small area in the village of Compton may be designated shortly, subject to the outcome of a consultation with affected residents. If an AQMA is designated, the Council will put together a Local Air Quality Action Plan to improve the air quality in this area.</p>
<ul style="list-style-type: none"> • Impact on rural character of the area. 	<p>The benefits associated with the delivery of the plan and associated essential infrastructure is considered to outweigh the change in character caused by the development of the slips roads.</p>
<ul style="list-style-type: none"> • Damage ancient woodland. 	<p>Ancient woodland is protected by national policy.</p>
<ul style="list-style-type: none"> • Not all the land is available to deliver the road. 	<p>The Council have undertaken full searches to ensure that land outside the Council's Option Agreement but required for the delivery of the slips is available.</p>

A44 Land west of Winds Ridge and Send Hill, Send

Main Issue	Guildford Borough Council Response
<p>Representations from Prescribed Bodies and Selected Stakeholders</p>	
<p>Surrey County Council</p> <ul style="list-style-type: none"> Under the column headed “Requirements,” please include the following bullet point: “The junction of Send Hill with Potters Lane needs improving to provide improved visibility”. 	<p>This has been included as a requirement (10).</p>
<p>Representations on Specific Issues</p>	
<p><i>Transport:</i></p> <ul style="list-style-type: none"> Road not suitable. <p>Dangerous junction.</p> <p>Will increase congestion.</p>	<p>Site access can be achieved from Send Hill. Although Send Hill does not have dedicated footways the character, speed of traffic and layout of Send Hill is suitable for shared use by vehicles and pedestrians, and it is an established residential area where pedestrians would currently be expected.</p> <p>Policy A44 includes a Requirement numbered (11), as proposed in the Draft Local Plan 2017, for improved visibility to be provided at the junction of Send Hill with Potters Lane.</p> <p>It is considered that, at the planning application stage, an applicant will be able to demonstrate the safe operation and performance of the Local Road Network, either as existing or improved as necessary.</p>
<ul style="list-style-type: none"> Adverse impact on infrastructure. 	<p>This is addressed in more detail under Policy ID1 and Appendix C: Infrastructure Schedule.</p>
<ul style="list-style-type: none"> Harm to the rural character of the area. 	<p>Policy D4 includes requirements for the character and design of all new development. It also includes a set of specific considerations for development within villages. This will help shape development proposals to ensure they respect the context of their rural location.</p>

<ul style="list-style-type: none"> Site was previously a landfill and is contaminated. 	<p>From our records this was a former sandpit turned landfill site, initially licensed in 1967 (under planning permission GU/R15658), and in 1976 and 1977 the site was re-licensed by P G Chambers (Waste Disposal) Ltd, who took over the tipping at the site in 1976. Tipping ceased in 1984 and the waste licence was surrendered in 1985.</p> <p>It is understood that sand was removed from the site to a depth of up to approximately 6m and replaced with commercial, industrial and some 'difficult waste' types.</p> <p>In addition to these waste types, records indicate that liquid waste including waste from gully clearance, factory interceptors and catchment pits was also accepted for a number of months during 1983. This site has been identified under Section 78 of the Environmental Protection Act 1990 as a potentially contaminated site but has not been designated as 'contaminated land' or a 'special site' as defined.</p> <p>We have previously monitored the site for landfill gas, and results have shown very low levels of erratic landfill gas generation. The site is typically an old, poorly compacted landfill site and the gas activity at this old landfill is very low with only occasional traces of methane detected.</p> <p>Monitoring of the eight boreholes present on the site has also indicated low gas pressures exist in the fill, allowing air ingress to occur and lowering the likelihood of lateral gas migration to adjacent residential properties.</p> <p>The remediation of this will need to be addressed as part of the planning application process.</p>
<ul style="list-style-type: none"> Not clear that the existing access is available for the use of this site. 	<p>The Council considers that access to the site is achievable from Send Hill Road.</p>

A45 Land at the rear of the Talbot, High Street, Ripley

Main Issue	Guildford Borough Council Response
<p>Representations from Prescribed Bodies and Selected Stakeholders</p>	
<p>Site promoters</p> <ul style="list-style-type: none"> • Residential allocation should be increased to 30 homes whilst the retail allocation should be reduced to 90 sq m. <p>The site area should be increased.</p>	<p>The site now has planning permission. It is recommended to amend the plan through a minor modification to reflect the detail within the approved scheme.</p> <p>The boundary follows the woodland edge which is the first continuous defensible boundary and is consistent with the recommendations in the GBCS.</p>
<ul style="list-style-type: none"> • Will increase congestion. 	<p>The delivery of new slip roads to / from the A3 at Burnt Common (schemes SRN9 and SRN10) in addition to the M25 Junction 10/A3 Wisley interchange 'Road Investment Strategy' scheme (scheme SRN3) will encourage traffic, particularly to/from the Woking direction to use the A3 rather than go through Ripley.</p>

A46 Land to the south of Normandy and north of Flexford

Main Issue	Guildford Borough Council Response
<p>Representations from Prescribed Bodies and Selected Stakeholders</p>	
<p>Surrey County Council</p> <ul style="list-style-type: none"> We note that the site was proposed to be removed from the green belt and safeguarded for potential future development in the previous draft Local Plan. The current version proposes to bring this site forward for development in this plan period to meet Guildford's housing needs. <p>Given this position and in the context of our forecast needs for additional school places over the plan period, required to support the proposed new housing to the west of Guildford, it is our view that the option to locate a secondary school here is acceptable, provided that the scale of housing proposed on this site is delivered to meet the need identified in the plan. This would also help to meet sustainable transport objectives, particularly if the scale of housing supports the delivery of the rail connectivity proposals and the station improvements.</p>	<p>An alternative school is now proposed on Blackwell Farm. Surrey County Council is supportive of this alternative school location. The exceptional circumstances that justified Normandy and Flexford are no longer there. This is discussed in further detail in the Housing Delivery topic paper.</p>
<p>Site promoters</p> <ul style="list-style-type: none"> Primary and secondary school proposed on site . 	<p>Site removed from the plan on the basis that the secondary school is now being provided on Blackwell Farm.</p>

<p>Thames Water</p> <ul style="list-style-type: none"> Wastewater network and treatment capacity in this area is unlikely to be able to support the demand anticipated from this development. <p>Upgrades required – can take 18 months to 3 years to deliver.</p> <p>Detailed water supply strategy, drainage strategy, and planning condition required.</p>	<p>Site removed from the plan on the basis that the secondary school is now being provided on Blackwell Farm.</p>
<p><i>Representations on Specific Issues</i></p>	
<p><i>Object to removal of site:</i></p> <ul style="list-style-type: none"> Results in an uneven distribution of development across the borough. <p>Site is sustainable being close to a train station.</p> <p>This site is more sustainable than A35 shown in the Sustainability Appraisal to be much more sustainable than A35. Therefore it should not have been deleted from the plan whilst A35 remains in it.</p>	<p>An alternative school is now proposed on Blackwell Farm. Surrey County Council are supportive of this school location. The exceptional circumstances that justified this site are no longer there. This, and the justification for the spatial strategy, is discussed in further detail in the Housing Delivery topic paper.</p>

A47 Land to the east of The Paddocks, Flexford

Main Issue	Guildford Borough Council Response
<p><i>Representations from Prescribed Bodies and Selected Stakeholders</i></p>	
<p>Site promoter</p> <ul style="list-style-type: none"> • Support the site allocation 	<p>This site has been removed from the plan. This site was resurveyed in 2016 and continues to be recommended as an SNCI. The SNCI value of the site is not considered to be compatible with development. This is discussed in further detail in the Housing Delivery Topic Paper.</p>
<ul style="list-style-type: none"> • The SNCI condition is assessed to be unfavourable declining. Development of the site would enable the SNCI to be protected, managed correctly and enhanced. 	<p>Whilst it is possible on certain SNCIs to carry out some development while maintaining the features of interest, it is not the case here. It is considered that most types of development would lead to a direct loss of part of the interest feature (unimproved grassland). This habitat has declined dramatically, about 97% has been lost in England in the last 60 years and therefore the remaining areas are considered important.</p>

A48 Land at Home Farm, Effingham

No Main Issues

A49 Palm House Nurseries

Main Issue	Guildford Borough Council Response
<i>Representations on Specific Issues</i>	
<p><i>Green Belt:</i></p> <ul style="list-style-type: none">• Should be retained as Green Belt. <p>No exceptional circumstances for the site.</p>	<p>The site was identified as appropriate for inseting in the GBCS. The exceptional circumstances that justify removing it from the Green Belt are set out in the Green Belt and Countryside Topic Paper.</p>

A50 Land at Whittles Drive

Main Issue	Guildford Borough Council Response
Representations on Specific Issues	
<p><i>Green Belt:</i></p> <ul style="list-style-type: none"> Should be retained as Green Belt. <p>No exceptional circumstances for the site.</p>	<p>The site was identified as appropriate for inseting in the GBCS. The exceptional circumstances that justify removing it from the Green Belt are set out in the Green Belt and Countryside Topic Paper.</p>
<p><i>Flooding - Sites A39, A40, A50 and A54:</i></p> <ul style="list-style-type: none"> The new climate change allowances have not been specifically mentioned in the Level 2 SFRA or local plan. However, the majority of allocated sites have detailed modelling where the 1 in 1000 year (0.1% annual exceedance probability) is available, these sites have been assessed against the 1 in 1000 year flood. For the purpose of accuracy and clarity we recommend that this approach of using the 1 in 1000 year flood event to account for climate change is clearly set out in the SFRA Level 2. <p>If these sites are adopted, at the planning application stage we would expect an assessment of climate change (using the new allowances) to be undertaken by applicants. We recommend applicants consult with the most recent national climate change guidance including our Thames Climate change guidance.</p>	<p>The Council has prepared an addendum to update the May 2016 Level 2 SFRA. This sets out the approach to which the respondent refers, to show that the SFRA took account of climate change in line with Planning Practice Guidance on Flood Risk and Coastal Change, published March 2014.</p> <p>The addendum has also taken on board the respondent's second suggestion by including a recommendation that potential applicants consult the more recent climate change guidance before submitting a proposal if a site is liable to be affected and to provide evidence that they have done so in a site-specific flood risk assessment. The site allocations policies refer to the need for applicants to have regard to the recommendations of the Level 2 SFRA.</p>

A51 Land at Cobbetts Close, Worplesdon

Main Issue	Guildford Borough Council Response
<p><i>Representations on Specific Issues</i></p> <p><i>Green Belt:</i></p> <ul style="list-style-type: none"> • Should be retained as Green Belt. <p>No exceptional circumstances for the site.</p>	<p>The site was identified as appropriate for inseting in the GBCS. The exceptional circumstances that justify removing it from the Green Belt are set out in the Green Belt and Countryside Topic Paper.</p>

A52 Four Acre Stables, Aldershot Road, Worplesdon

Main Issue	Guildford Borough Council Response
<p><i>Representations on Specific Issues</i></p>	
<ul style="list-style-type: none"> • Occupation should be not be restricted to a particular family only. 	<p>The policy wording makes clear that the historical personal circumstances of the particular family currently occupying the site were a significant consideration when temporary planning permission was granted. Allocating the site was a balanced judgement of considering the harm to the Green Belt and character of the area versus the benefits which include consideration of the personal circumstances of the family currently occupying the site. The same approach is taken for policies A55 and A57.</p>

A53 Roundoak, White Hart Lane, Wood Street Village

No Main Issues.

A54 Lakeview, Lakeside Road, Ash Vale

Main Issue	Guildford Borough Council Response
<i>Representations on Specific Issues</i>	
<p><i>Flooding - Sites A39, A40, A50 and A54:</i></p> <ul style="list-style-type: none"> The new climate change allowances haven't been specifically mentioned in the Level 2 SFRA or local plan. However, the majority of allocated sites have detailed modelling where the 1 in 1000 year (0.1% annual exceedance probability) is available, these sites have been assessed against the 1 in 1000 year flood. For the purpose of accuracy and clarity we recommend that this approach of using the 1 in 1000 year flood event to account for climate change is clearly set out in the SFRA Level 2. <p>If these sites are adopted, at the planning application stage we would expect an assessment of climate change (using the new allowances) to be undertaken by applicants. We recommend applicants consult with the most recent national climate change guidance including our Thames Climate change guidance.</p>	<p>The Council has prepared an addendum to update the May 2016 Level 2 SFRA. This sets out the approach to which the respondent refers, to show that the SFRA took account of climate change in line with Planning Practice Guidance on Flood Risk and Coastal Change, published March 2014.</p> <p>The addendum has also taken on board the respondent's second suggestion by including a recommendation that potential applicants consult the more recent climate change guidance before submitting a proposal if a site is liable to be affected and to provide evidence that they have done so in a site-specific flood risk assessment. The site allocations policies refer to the need for applicants to have regard to the recommendations of the Level 2 SFRA.</p>

A55 The Orchard, Puttenham Heath Road, Puttenham

Main Issue	Guildford Borough Council Response
<i>Representations on Specific Issues</i>	
<p><i>Green Belt:</i></p> <ul style="list-style-type: none">• Should be retained as Green Belt. <p>No exceptional circumstances for the site.</p>	<p>The site was identified as appropriate for inseting in the GBCS. The exceptional circumstances that justify removing it from the Green Belt are set out in the Green Belt and Countryside topic paper.</p>

A56 Valley Park Equestrian, East Shalford Lane, Shalford

Main Issue	Guildford Borough Council Response
<i>Representations on Specific Issues</i>	
<p><i>Green Belt:</i></p> <ul style="list-style-type: none"> Should be retained as Green Belt. <p>No exceptional circumstances for the site.</p>	<p>The site was identified as appropriate for inseting in the GBCS. The exceptional circumstances that justify removing it from the Green Belt are set out in the Green Belt and Countryside topic paper.</p>
<p><i>AONB:</i></p> <ul style="list-style-type: none"> Contrary to Policy LU1 of the Surrey Hills AONB Management Plan 2014-2019 which states: "That in balancing different considerations associated with determining planning applications and development plan land allocations, great weight will be attached to any adverse impact that the proposal would have on the amenity, landscape and scenic beauty of the AONB". 	<p>Its location in the AONB is listed as a key consideration and will be considered through the planning application process. The NPPF states that major development should be refused except in exceptional circumstances. The Council does not consider that this constitutes major development. Weight is also give to the provision of pitches to meet our identified need.</p>

A57 The Paddocks, Rose Lane, Ripley

Main Issue	Guildford Borough Council Response
<i>Representations on Specific Issues</i>	
<p><i>Green Belt:</i></p> <ul style="list-style-type: none"> Should be retained as Green Belt. <p>No exceptional circumstances for the site.</p>	<p>The site was identified as appropriate for inseting in the GBCS. The exceptional circumstances that justify removing it from the Green Belt are set out in the Green Belt and Countryside topic paper.</p>

A58 Land around Burnt Common Warehouse

Main Issue	Guildford Borough Council Response
<p>Representations from Prescribed Bodies and Selected Stakeholders</p>	
<p>Highways England</p> <ul style="list-style-type: none"> In its representation on the Draft Local Plan 2017, under headings referencing policies A35, A43, A43a, A58, Appendix C and the Transport topic paper, stated that: ‘As stated in our letter dated 5 October 2017, it remains unclear if the two new slip roads at A247 Clandon Road (Burnt Common) are deliverable and what the conditional requirements are to enable the proposals to progress. It is not clear if proposals set out in Policy A43 (and now additionally Policy A58 and A35) are dependent on GBC’s aspirations set out in A43a. Appendix C Infrastructure Schedule notes that the Burnt Common slip road scheme will be wholly developer funded. To date we do not have any evidence that such an improvement is deliverable and could be designed in conformity with the Design Manual for Roads and Bridges. We would welcome further discussions on these policies. <p>We understand that the Wisley Airfield site is expected to go to Planning Appeal in September 2017 which will likely have implications for the soundness of these policies, therefore discussions are urgent if proposals are reliant upon the improvement set out in A43A [sic] that is being promoted by Guildford Borough Council and Surrey County Council.’ [Second paragraph in text box in the original.]</p>	<p>Schemes SRN9 and SRN10, allocated in Policy A43a, are being promoted to mitigate the impact of the level of strategic planned growth and in particular the development traffic flows resulting from the development of a new settlement at the former Wisley airfield site (Policy A35), as well as limiting any increase in traffic joining and leaving the A3 at the Ockham interchange. Requirement (4) for the site allocation Policy A35, as proposed in the Draft Local Plan 2017, is that the two new slip roads are the identified mitigation to address the impacts on Ripley High Street and surrounding rural roads.</p> <p>The Council considers that site allocation Policy A43, as well as Policy A58, are not directly dependent on schemes SRN9 and SRN10, allocated in Policy A43a. Rather, as stated above, the Council has planned on the basis that these schemes will be delivered by the developer of the former Wisley airfield site (Policy A35) and that this will be ‘when first needed to serve the development’s occupants and users and/or to mitigate its otherwise adverse material impacts’ (Policy ID1 at point (1)).</p> <p>In producing a new Local Plan for its area, Guildford Borough Council as the local planning authority is required to allocate sites for development (NPPF, 2012: paragraph 157) and to assess the quality and capacity of infrastructure for transport and its ability to meet forecasts (NPPF, 2012: paragraph 162). The Submission Local Plan’s spatial strategy and key infrastructure schemes, as included in the Infrastructure Schedule, have been planned together and are interdependent in various ways. In short, the spatial strategy as</p>

	<p>proposed is dependent on the key infrastructure schemes as proposed.</p> <p>Guildford Borough Council considers that schemes SRN9 and SRN10, allocated in Policy A43a, are deliverable. Work is ongoing to demonstrate the Council's position.</p>
<p>Natural England</p> <ul style="list-style-type: none"> The site is adjacent to ancient woodland. The policies should ensure that any direct or indirect impacts on these sites are avoided or mitigated. 	<p>The presence of ancient woodland is listed as a key consideration. Appropriate mitigation will be considered as part of the planning application process.</p>
<p><i>Representations on Specific Issues</i></p>	
<ul style="list-style-type: none"> It was deleted from the 2014 draft because of all the objections made previously. <p>The word "minimum" is a change from the previous "maximum" in the 2016 plan and since that time there has been a decline in demand for industrial land.</p> <p>There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.</p> <p>The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt.</p> <p>The proposed additional industrial space at this site would worsen the already overburdened A3 and M25 traffic flows in the area where Highways England have no funded plans to increase vehicle capacity on these major routes.</p>	<p>The site contributes to meeting the need for industrial uses within the borough.</p> <p>No suitable alternative sites were found within the urban area.</p> <p>A structural level of vacancy is built into the need assessment to enable the economy to function efficiently.</p> <p>The it is proposed to recommend a minor modification to the wording of the policy to read - The site is allocated for a minimum of 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) <u>over the plan period with a potential for further industrial floorspace to meet future borough needs, as identified through subsequent updates to the Employment Land Needs Assessment (ELNA).</u></p> <p>A further minor modification is also recommended to be added to the Key considerations to read - (3) An initial masterplan for the site have shown that it has total capacity for more than 7,000 sq m however the ELNA anticipate that approximately this amount will be required over the plan period to</p>

	<p>2034 to meet identified needs. The ELNA will be updated every three years and if updates show a higher need for industrial class floorspace, this site would be able to provide a larger amount either within or after the plan period.</p> <p>The size of the site is in part determined by finding an appropriate green belt boundary.</p> <p>In the Draft Local Plan 2017, it was proposed to remove the allocation of 7,000 sq m of industrial land (comprising either or a mix of B1c, B2 and B8) to the Garlick's Arch site (Policy A43). Instead, the 7,000 sq m of industrial land was proposed to be allocated to the land around the Burnt Common warehouse (Policy A58).</p> <p>Both the Policy A43 and Policy A58 sites are in the same model zone as represented in transport models used for the Guildford Borough Proposed Submission Local Plan "June 2016": Strategic Highway Assessment Report (Surrey CC, June 2016) (hereafter the SHAR 2016)</p> <p>Accordingly, the SHAR 2016 assessment for this zone remains valid.</p> <p>The above was described in the addendum to the SHAR 2016 (Guildford BC, June 2017). The addendum also identifies that there is an overall reduction in the quantum of development proposed in the Draft Local Plan 2017, when compared to the Draft Local Plan 2016.</p> <p>The SHAR 2016 represents a robust "worst case" in terms of transport demand and supply assumptions, as it does not assess and therefore does not account for the mitigation; including the potential for modal shift, and the new and improved sustainable transport choices provided by the rail, bus and active modes schemes included in the Draft Local Plan 2016 and makes no allowance for any internalisation of trips within the larger sites.</p>
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	<p>The SHAR 2016 concludes that “The results show that for Scenario 5, which represents the quantum and distribution of development proposed in the Proposed Submission Local Plan together with the key highway schemes, there will not be a severe impact on the local and strategic highway network” (p.62). The addendum to the SHAR 2016 (Guildford BC, June 2017) found that this conclusion was “not considered likely to change” as a result of the key changes made to proposed site policies and to the programme of transport schemes in the Draft Local Plan 2017.</p>
<ul style="list-style-type: none"> • Even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt. 	<p>The proposed rewording of the policy makes it clear further floorspace will need to be justified in terms of contributing to meeting unmet need. This contributes to the plans flexibility.</p>
<p><i>A247 through West Clandon:</i></p> <ul style="list-style-type: none"> • The A247 through West Clandon is not suited to cope with additional traffic for reasons including: <ul style="list-style-type: none"> (i) although notionally an A-road the A247 is narrow and winding in parts and is most unsuited to carrying additional traffic, (ii) the A247 has a single non-continuous footpath in several sections, (iii) a care home, a church car park and a pub, as well as very many houses, are located on the opposite side of the road to the only footpath, making pedestrian access difficult for people moving about the village on foot, especially for elderly and disabled people; (iv) the railway station and other commercial and residential properties have poor sight lines for access onto the A247 and difficulties in accessing the A247 from these properties will be exacerbated by increased traffic volume (and fewer “gaps” between cars); (v) the A247 is popular with cyclists and because of its 	<p>The traffic impacts on the local road network are an important consideration.</p> <p>The A247 is an A-road. The DfT has defined A-roads as ‘major roads intended to provide large-scale transport links within or between areas’ (DfT, January 2012: p.6). Surrey County Council, as the Local Highway Authority, is responsible for maintenance and improvement, of adopted local roads, which collectively comprise the Local Road Network, including the A247.</p> <p>The Guildford Borough Proposed Submission Local Plan “June 2016”: Strategic Highway Assessment Report (Surrey CC, June 2016) (hereafter the SHAR 2016) represents a robust “worst case” in terms of transport demand and supply assumptions, as it does not assess and therefore does not account for the mitigation; including the potential for modal shift, and the new and improved sustainable transport choices provided by the rail, bus and active modes schemes included in the Draft Local Plan 2016 and makes no allowance for any internalisation of trips within the larger sites.</p>

narrow and winding nature the potential for accidents that additional traffic will cause is clear.

Road already has numerous accident black spots, such as: (i) the exit from Clandon station which has extremely poor sight lines due to a humped back bridge where numerous accidents have occurred; (ii) the exit from the Onslow Arms pub which is almost blind due to the pub building being adjacent the road – a vehicle has recently ended up in the garden of the cottage opposite; (iii) the narrow section outside “Summers” which is regularly littered with the wing mirrors of cars which have made contact, as well as being a dangerous area for pedestrians due to vehicles mounting the pavement to try to pass; (iv) the winding section outside Clandon Regis and near the primary school which regularly suffers from demolition of gate posts and fences as vehicles leave the road; (v) the bend near West Clandon church which has seen damage caused to the flint wall in recent years.

The SHAR 2016 concludes that “The results show that for Scenario 5, which represents the quantum and distribution of development proposed in the Proposed Submission Local Plan together with the key highway schemes, there will not be a severe impact on the local and strategic highway network” (p.62). The addendum to the SHAR 2016 (Guildford BC, June 2017) found that this conclusion was “not considered likely to change” as a result of the key changes made to proposed site policies and to the programme of transport schemes in the Draft Local Plan 2017.

The SHAR 2016 indicates that additional mitigation may need to be considered on the A247, due to the cumulative impact coupled with re-routing (paragraph 4.5.3).

It is considered that the A247 can be improved as necessary in order to maintain its safe operation and performance. Scheme LRN20 ‘A247 Send Road/Send Barns Lane (Send) traffic management and environmental improvement scheme’ is included in the Infrastructure Schedule.

In addition, the Submission Local Plan provides the planning policy framework to allow for the consideration of such additional mitigation either through the development management process for planning applications, having regard particularly to Policy ID3 at point (7), or through any updates to the Infrastructure Schedule provided in the latest Guildford borough Infrastructure Delivery Plan, as provided for in Policy ID1 at point (4) and in Policy ID3 at point (8).

<p><i>Ewbank's site:</i></p> <ul style="list-style-type: none"> The site should be extended to include the Ewbanks site to the west as was the case in the draft Local Plan (2014). Its development would not result in neighbouring settlements merging into one another - strongly refute the statement in the Borough Council's Employment Topic Paper – June 2017 (para 4.55) that the development of the Ewbank's site would result in 'perceived coalescence'. The inference is that there would be a risk of coalescence between the Ewbank's site and the proposed development at Gosden Hill Farm, Merrow Lane, Guildford to the south west. However, this would not be the case, as the two sites are separated by countryside, and also the A3 dual-carriageway trunk road. The Ewbank's site is predominantly 'brownfield' and could be accommodated on the local road network. <p>Ewbank's Auction Rooms has an urgent need for additional floor space and wishes to remain on this present site given its location, and wishes to continue their expansion. The current requirement is for an additional 700 square metre building (minimum) to accommodate existing expansion needs.</p>	<p>The extension to the site allocation is not required to meet objectively assessed need. There are therefore no exceptional circumstances to justify removing it from the Green Belt. The Green Belt boundary proposed is soundly based on physical features that are recognisable, likely to be permanent and consistent with Volume III of the GBCS. It is also considered beneficial to limit the scope of the site to the south to maintain separation of this urban land with the built up form of the proposed development at Gosden Hill Farm.</p> <p>Such an extension would need to demonstrate very special circumstances through a planning application to overcome the Green Belt designation.</p>
<p><i>Allocation A58 and Amendments to Policy E1:</i></p> <ul style="list-style-type: none"> Effectively new Allocation A58 together with the changes to Policy E2 and their associated text in the reasoned justification, provides a clear basis for the provision of a new major strategic site which would be available and treated as suitable for new waste management development on a site currently in the Green Belt. <p>The Parish Council considers that such a use on this site would be inappropriate.</p>	<p>As described in the Reasoned Justification at paragraph 4.4.23 a development of waste facilities can be appropriate on Industrial Strategic Employment sites. Any proposals will need to be assessed on their individual merits.</p>

A59 New rail station at Guildford West (Park Barn)

Main Issue	Guildford Borough Council Response
<p><i>Representations on Specific Issues</i></p>	
<p><i>Guildford West (Park Barn) rail station will attract additional traffic in congested area:</i></p> <ul style="list-style-type: none"> New rail station will create a new destination for traffic/add to severe congestion on local roads, including Egerton Road, and parking problems in Park Barn, and mitigation has not been considered. 	<p>It is expected that, borough-wide, modal shift of car to rail trips will significantly outweigh new vehicle trips to access the new rail station at Guildford West (Park Barn). The station is not planned to be a 'parkway' station so sustainable transport options for travel to and from the site will be the priority. The new station will serve the existing community, the employment and educational destinations in the area, including the University of Surrey's Manor Park campus, the Surrey Research Park and the Royal Surrey County Hospital, as well as serving the Blackwell Farm site.</p>
<p><i>No evidence of Network Rail commitment to scheme:</i></p> <ul style="list-style-type: none"> No evidence that Network Rail has approved or formally committed to technical feasibility of the scheme or cost of the scheme. 	<p>A Strategic Outline Business Case and a Network Rail compliant GRIP2 study has been completed. Network Rail have reviewed and commented on the Phase 3 Outline Business Case.</p>
<p><i>Access from south of site not allocated – therefore uncertainty:</i></p> <ul style="list-style-type: none"> The deliverability of the policy is called into question because the land is not allocated to the south of the site allocation on the Royal Surrey County Hospital estate for a facility for taxis, buses, disabled parking and 'kiss and ride'. <p>Direct pedestrian access to Surrey Research Park should be added as a requirement, rather than assuming access via the Royal Surrey County Hospital estate). It should also be stated that pedestrian access from Surrey Research Park / Royal Surrey County Hospital to Park Barn should be mandatory and available at all times (i.e. not restricted by being "station property" and "not a public right of way").</p>	<p>The Royal Surrey County Hospital is a partner in the development of the new rail station. The access is a requirement to deliver sustainable access to the station. Access will be agreed and further defined as part of the planning application.</p>

<p><i>Cost raised issue of deliverability:</i></p> <ul style="list-style-type: none">• Cost of new station (£10m) would add to the unacceptable infrastructure burden placed on developer of Blackwell Farm and danger that it would not fulfil its infrastructure commitments.	<p>Policy A26 requires a necessary and proportionate contribution to delivering Guildford West (Park Barn) railway station.</p>
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Draft

Appendix A: Glossary

No Main Issues.

Appendix A1 – Maps showing 500m buffer of Public Transport Interchange

No Main Issues.

Appendix A2 – Evidence of active and comprehensive marketing

No Main Issues.

Appendix B: Hierarchy of retail and service centres and Guildford Town Centre shopping frontages

Main Issue	Guildford Borough Council Response
<i>Representations on Specific Issues</i>	
<ul style="list-style-type: none"> Object to designation of Station Parade, East Horsley as a District Centre. 	<p>Objection noted. However, Station Parade was designated as a new district centre in the 2003 Local Plan due to its size and catchment. It contains at least 30 non-residential units including a Budgens supermarket and local services.</p>
<ul style="list-style-type: none"> Horsley Village’s “Station Parade” is being described as a “District Centre”, which is used to support the case for a very large number of new houses in the vicinity. <p>This policy is based on misleading interpretation of the facilities in the village and will make it a target for future inappropriate developments, including larger retail conglomerates.</p> <p>Station Parade has been inappropriately designated as a “Rural District Centre”, apparently partly because it has a “large supermarket”. The Budgens in Horsley is a small shop or convenience store (able to trade all day on Sunday) not a large supermarket (station parade).</p>	<p>Station Parade was designated as a new district centre in the 2003 Local Plan due to its size and catchment. It contains at least 30 non-residential units including a Budgens supermarket and local services. There is no requirement for a centre to have a ‘large’ supermarket to qualify as a district centre – the Retail and Town Centres topic paper (last updated June 2017) refers to ‘a supermarket’ without mention of its size.</p> <p>Budgens is described on its website as a ‘neighbourhood supermarket’ and it is allowed to open longer hours on Sundays than larger supermarkets as it falls below the size threshold for stores that are subject to the Sunday trading law – this applies to larger shops over 280 sq m (source: https://www.gov.uk/trading-hours-for-retailers-the-law).</p>

<ul style="list-style-type: none"> There is no space in Station Parade for expansion of shops and facilities Parking is difficult in Station Parade so cannot be a district centre. 	<p>Station Parade qualifies as a district centre (see response above). Free short stay on-street parking of one-hour duration is available outside the shops in Station Parade, with additional three-hour parking bays to the rear of units along the eastern carriageway of Station Parade within a Council-owned car park (also free of charge). The space available for expansion of shops and facilities in this area should not be a particular issue. The district centre has a large range of shops and services and the 2014 Retail and Leisure Study identified a potential opportunity to expand existing retail provision by providing a new supermarket on the Council-owned car park. The level of use of parking in the centre would need to be considered if redevelopment of the car park were to take place. It is important to direct retail development to district centres.</p>
<ul style="list-style-type: none"> Object to proposal to take Ripley out of the Green Belt and designated as a "District Centre". <p>The boundary for the Primary Shopping Area is to be contiguous with the boundary of Ripley itself, opening the door to commercial development outside of the High Street.</p> <p>This is being done without any prior consultation and without following proper procedure, which is unacceptable. It does not consider the current paucity of parking, yet proposes to add to the burden.</p> <p>It will increase the traffic on the interchange with Newark lane and Rose Lane in the village centre, identified choke points.</p>	<p>Ripley was designated as a new district centre in the 2003 Local Plan due to its size and catchment. It contains 52 (as of May 2017) non-residential units including a supermarket and local services. The Council consulted on this as part of the Submission Local Plan consultation in June 2016, which follows the correct procedure under the Local Planning Regulations 2012.</p> <p>Site A45 is the only site that is proposed in Ripley and includes new additional retail floorspace (A1-A5 uses) as well as 26 homes. It is located within the High Street, on land to the rear of the Talbot Hotel. Ripley has free on-street parking on the High Street as well as free off-street parking in the car park at White Hart Meadows. The additional usage of public parking from the new homes proposed in this area is not considered liable to significantly increase to the point of needing to abandon the proposal to develop a limited number of new homes, shops and facilities in Ripley.</p>

<ul style="list-style-type: none"> Support identification of Ripley as a District Centre (although there are limited opportunities to expand it), subject to an amendment stating: “In order to strengthen the liveliness and economic resilience of the borough’s District Centres, retail developments or other suitable District Centre uses including; restaurants, takeaways, small scale offices and community uses, consistent with the scale and function of that centre, will be supported in the Primary Shopping Area.” The policy should also allow flexibility for new units for a flexible range of town centre uses, which will support the vitality and viability of the District centre. 	<p>The issue raised has been addressed by adding ‘and other town centre uses’ after retail developments in Policy E8.</p> <p>Note that the Primary Shopping Area applies to the whole of the district centres (or the town centre PSA), and therefore has not been referred to in this policy, as the policy applies to the area within the boundary of the district centres as a whole.</p>
<ul style="list-style-type: none"> Distinction made between district and local centres in the Local Plan is illusory, and not helpful in planning terms. Distinction could perhaps be made between village centres and urban centres. The Settlement Hierarchy that sought to classify settlements by the facilities that they offered was comprehensively discredited in 2013-14, and now appears to have been downplayed to the point of invisibility in the current round of consultation. 	<p>The classification of the settlements listed in policies E8 and E9 is not the same as the system of classification used for the July 2013 Settlement Hierarchy document. The Retail and Town Centres topic paper (June 2016, updated June 2017) defines a district centre as including at least 30 non-residential units, including a supermarket and other local services. This definition was adopted in the 2003 Local Plan and was based on the national planning policy of the time. The 2003 Local Plan defines Local centres as containing at least five adjoining/neighbouring Class A retail units.</p> <p>The definition of district centres could be usefully incorporated into the ‘Definitions’ text under policy E8. This will be suggested as a minor amendment.</p>
<ul style="list-style-type: none"> Jacobs Well would seem to qualify as an existing Local Centre and should be included. 	<p>Amendment made – Jacobs Well has been included as a new rural local centre in policy E9 of the Submission Local Plan 2017.</p>

Appendix C: Infrastructure Schedule

Main Issue	Guildford Borough Council Response
<p><i>Representations from Prescribed Bodies and Selected Stakeholders (2016 Consultation)</i></p>	
<p>Surrey County Council</p> <ul style="list-style-type: none"> Surrey CC state that as transport schemes in Infrastructure Schedule are advanced as concepts and land requirements are known, appropriate action to safeguard the land will need to be taken. 	<p>Schemes are anticipated to be realised within the highway boundary and/or within land controlled by the developer within the site boundary and/or by agreement with third parties.</p>
<p><i>Retain Policy M8 safeguard Guildford to Cranleigh Movement Corridor:</i></p> <ul style="list-style-type: none"> Policy M8 (The Guildford to Cranleigh Movement Corridor) of the existing 2003 Local Plan safeguards the route of the former Cranleigh railway line. While there is little likelihood of this corridor being required for a major alternative piece of infrastructure, such as a light railway, it is nonetheless a vital facility for cyclists and walkers and will continue to serve that function. Its general quality will need to be maintained and improved where possible, so for this reason it should continue to be safeguarded as a corridor. 	<p>Site allocation policies allocate land for development during a plan period. As the representation makes clear, no development is planned during the plan period.</p> <p>Footpaths and bridleways in Surrey County Council's Rights of Way network are coincident with most of the section of the Guildford to Cranleigh Movement Corridor within Guildford borough, as defined by the existing 2003 Local Plan.</p> <p>Surrey County Council's ambition to maintain and improve the Guildford to Cranleigh Movement Corridor within Guildford borough would be best achieved by:</p> <ul style="list-style-type: none"> The use by Surrey County Council of its power as Local Highway Authority to make an order creating a Right of Way over the A281 Horsham Road to Tannery Lane section of the former railway line which is not presently so designated, or alternatively to enter into an agreement with the landowner to create a Right of Way. The maintenance and improvement of the relevant Rights of Way by Surrey County Council.

- SED1 – Surrey CC request that under the column headed “Infrastructure Type Infrastructure Project”, the reference in the first sentence to “maximum 6 FE” needs to be amended to state: “up to 7 FE”; that to be consistent with the other entries, in the column headed “likely cost and funding source,” delete: “Developer contributions (from other sites) to fund building”; and suggest that wording is added to say that the shared community use of the school playing fields will be secured by a legal agreement.

SED2 – Surrey CC request that under the column headed Infrastructure Type Infrastructure Project, remove the words: “(to age 16)” to facilitate flexibility for future provision; and in the column headed “likely cost and funding source” amend the first entry to read: “Developer to provide serviced land at nil cost and transfer it to SCC.”

SED3 – Surrey CC request that in the column headed “Infrastructure Type Infrastructure Project”, the reference in the first sentence to an “A 7- form entry (7FE) secondary school” needs to be amended to “up to 8 FE to” be consistent with the penultimate bullet point under “Allocation” in Policy A46; that in the column headed “likely cost and funding source”, after the words “...including Blackwell Farm strategic site” suggest that the following words are added: “and the site allocation comprising land to the South and East of Ash and Tongham.”; and in the column headed “likely cost and funding source”, amend the first entry to read: “Developer to provide serviced land at nil cost and transfer it to SCC.”

Strategic Road Network:

SRN4, SRN9, and SRN10: For those elements of infrastructure that are entirely the responsibility of a given developer, Surrey County Council should be deleted from the

SED 1: The maximum 6FE (and by virtue of this the opportunity to include up to 7FE) has been deleted as this would only be required should the school at Wisley not come forward. The plan is written on the basis that both sites and both schools are delivered. Should one site fall away then the plan would need to be amended to respond to this. Wording has been deleted as suggested.

Dual use included in site allocation policy for Blackwell, Gosden and Wisley.

SED2: The wording has been amended in line with suggestion.

SED3: Consistent wording changes have been included for Blackwell Farm, where appropriate. Surrey CC (2017 submission) welcome amendments made to SED3.

For those elements of infrastructure that are entirely the responsibility of a given developer, Surrey County Council has been deleted from the "Delivered by" column.

Schemes BT5 and BT6 serving Gosden Hill and Blackwell Farm have been added.

A new requirement to ‘Provide permeability for pedestrians and cyclists into and from the development, especially from the urban area of Guildford’ has been added to policies A25 and A26, for Gosden Hill Farm and Blackwell Farm sites respectively, numbered (6) in both site policies. Further, Policy ID3 has been strengthened in respect of the requirements for the provision of walking and cycling routes – see Policy ID3, point (2).

"Delivered by" column.

Local Road Network:

LRN3: The new signalised junction from Blackwell Farm site to A31 Farnham Road, would be a Section 278 Agreement, delivered in its entirety by the developer. Surrey County Council should be deleted from the "Delivered by" column.

Local Road Network:

LRN3, LRN4, LRN5, LRN6, LRN7, and LRN8: For those elements of infrastructure that are entirely the responsibility of a given developer, Surrey County Council should be deleted from the "Delivered by" column.

Bus Transport:

Under BT2, Surrey County Council should be deleted from the "Delivered by" column.

Suggest the inclusion two additional BT infrastructure entries relating to the need to provide significant bus networks serving the two east and west urban extensions.

Active Modes

Suggest the inclusion of two additional AM infrastructure entries relating to the need to provide significant cycle and pedestrian permeability improvements linking these extensions into the existing urban fabric.

Representations on Specific Issues (2016 Consultation)	
<p><i>NR1, NR2 – feasibility of delivering new rail schemes at Guildford West (Park Barn) and Guildford East (Merrow):</i></p> <ul style="list-style-type: none"> New rail stations – Not clear that all requisite land has been safeguarded. <p>NR2 New rail station at Guildford West (Park Barn) – delivery by 2018/19 is very optimistic.</p>	<p>The Draft Local Plan 2017 allocates the land for a new rail station at Guildford West (Park Barn) in Policy A59. Policy A25 Gosden Hill Farm includes requirement (7) ‘Land and necessary and proportionate contribution to delivering Guildford East (Merrow) railway station.’</p> <p>The Draft Local Plan 2016 Plan indicated that both the new rail stations will be delivered in the period ‘Between 2018 and 2029’. This has been changed in the Draft Local Plan 2017 to ‘Between 2024 and 2029’. 2024 is the likely start of the South West rail franchise subsequent to that beginning in 2017. It would be possible, at present, for the new rail station at Guildford West (Park Barn) to be built by 2022.</p>
<p><i>SRN 2 – criticisms of representation of and/or reliance of A3 Guildford (A320 Stoke interchange junction to A31 Hog’s Back junction) ‘Road Investment Strategy’ scheme:</i></p> <ul style="list-style-type: none"> The Local Plan should safeguard land for tunnel portals to ensure that a tunnel option for the improvement of the A3 Guildford could go ahead. <p>SRN2 A3 Guildford (A320 Stoke interchange junction to A31 Hog’s Back junction) ‘Road Investment Strategy’ scheme (E31) – The delivery of this scheme is years off (2025-30) and, if implemented, preceded by years of traffic disruption/gridlock on local roads during its construction.</p> <p>The outcome of ongoing Highways England study work should be reflected in the Draft Local Plan and, if necessary, used to refine the Appendix C Infrastructure Schedule.</p>	<p>Highways England is progressing the development of a major scheme for the improvement of the A3 in Guildford from the A320 to the A31 Hog’s Back junction, as required by the Road Investment Strategy: for the 2015/16 – 2019/20 Road Period (Department for Transport, March 2015) (hereafter the RIS). The RIS identifies the A3 Guildford scheme as a scheme which will be developed during this Road Period (p.30) – in the period to 2020 – to enter construction in the next Road Period (p.46). This scheme is referenced as SRN2 in the Submission Local Plan’s Infrastructure Schedule.</p> <p>Highways England ruled out options for tunnel schemes for the improvement of the A3 Guildford in 2016/17 having considered their feasibility.</p> <p>Highways England is actively developing the A3 Guildford scheme, and, in 2017, progressed the scheme from stage 0 ‘Strategy, shaping</p>

and prioritisation' to stage 1 'Option identification' of its project control framework.

Applying a cautious approach Highways England has advised that, if a scheme is approved with funding agreed, construction is unlikely to be start until 2024 at the earliest, with construction taking 2½ years.

In the early years of the new Local Plan, the delivery of planned development and the impact of new development traffic on the Strategic Road Network (SRN) is likely to be an important ongoing consideration as the existing SRN suffers from significant congestion during peak periods. Highways England's main concern is road safety and any proposal that adds significant levels of traffic to existing congested areas will need to be carefully assessed through the development management process for planning applications to ensure that it does not have a severe impact on road safety.

With this in mind, the delivery of planned development has been proposed to ensure that the sites, and phasing of sites, that will be delivered in the first years of the new Local Plan, and therefore in the absence of the Department for Transport's RIS Road Period 1 and/or Road Period 2 schemes are located where traffic associated with them will have the least impact on the SRN's links and junctions where current congestion issues are the most acute.

Highways England has developed several targeted improvement schemes for the Guildford section of the A3, primarily to improve road safety but also providing some congestion relief. In March 2017, the Government committed funding for two of these schemes, which are included in the Proposed Submission Local Plan's Infrastructure Schedule as:

- SRN7 'A3 northbound off-slip lane widening at University Interchange (approaching Tesco roundabout) improvement scheme'
- SRN8 'A3 southbound off-slip lane widening to A320 Stoke

Interchange improvement scheme’.

The two schemes will be delivered by spring 2020.

For a major highway scheme, the traffic impacts during its construction phases will be managed through a Construction Management Plan.

Policies in the Submission Local Plan manage the risks arising from the uncertainties regarding the delivery and timing of delivery of the key infrastructure on which the delivery of the Plan depends, including the three RIS schemes. In this regard, see Policies ID1, ID3 (point (8)) and the site Policies A24 (requirement (2)), A25 (requirement (9)), A26 (requirement (9)) and A35 (requirement (5)). This could include consideration of traffic impacts during the construction phases of the RIS schemes.

The development management process for major planning applications will also involve the consideration of the traffic impacts of the construction phases of the RIS schemes – see Policy ID3 point (7).

Policy ID1, as amended in the Draft Local Plan 2017, at point (4), refers to the key infrastructure as being ‘set out in the Infrastructure Schedule at Appendix C, or any updates in the latest Guildford borough Infrastructure Schedule’. Policy ID3, at point (8), contains similar phrasing. Accordingly, these policies provide the local planning authority with the flexibility to respond to the future design of schemes which will realise the key infrastructure requirements, including the RIS schemes.

<p><i>SRN9 and 10 north-facing junctions to the A3 at A247 Clandon Road (Burnt Common) – delivery planned later than growth:</i></p> <ul style="list-style-type: none"> Given that all or a proportion of new trips generated by the development of the former Wisley airfield site (Policy A35) are reliant on the delivery of schemes SRN9 and SRN10 which could be completed as late as 2027/28, and/or other interventions required to address potential highway performance issues, the form and timescale of which is currently uncertain and also could be delivered as late as 2027/28, it is unclear whether the Council will be able to allow, or rely on, the delivery of an estimated 650 homes by 2027/28. 	<p>The Draft Local Plan 2017 estimates that the former Wisley airfield site will deliver 800 new homes by 2027/28.</p> <p>At the Public Inquiry in September / October 2017 for the Planning Appeal for the residential development of the former Wisley Airfield site, Surrey County Council as Local Highway Authority and Guildford Borough Council as local planning authority were minded to enter into a Section 106 agreement with Wisley Property Investments Limited that required the developer to deliver SRN9 and SRN10 prior to the occupation of 1,000 dwellings. Highways England did not agree to this trigger and work will continue with them to agree the technical and trigger points for the SRN9 and SRN10 improvements prior to the commencement of the Examination in Public. Highways England do not object to the principle of a modification to the Burnt Common junction to provide SRN9 and SRN10.</p>
<p><i>SRN9 and SRN10 – A3 northbound on-slip and southbound off-slip at A247 Clandon Road (Burnt Common):</i></p> <ul style="list-style-type: none"> Object to the late committee stage at which schemes SRN9 and SRN10 and corresponding site allocation Policy A43a were added to the emerging draft Local Plan in the Draft Local Plan 2016, and that these proposals were not considered and made available for public comment earlier in the plan-making process, and have not been properly appraised and their inclusion is not based on proportionate evidence. <p>Previous draft allocations in 2013 and 2014 consultation documents did not require schemes SRN9 and SRN10 therefore the slip roads are not required to support the site allocation at Policy A35 at the former Wisley airfield, and the previous proposed allocation at Burnt Common Warehouse, which was allocated for same amount of B1c/B2/B8</p>	<p>The Council followed due process in adding schemes SRN9, SRN10, and Site Policy A43a to the working draft of the Draft Local Plan 2016 in the Council's committee process. The Draft Local Plan 2016 was subject to public consultation.</p> <p>The Guildford Borough Proposed Submission Local Plan "June 2016": Strategic Highway Assessment Report (Surrey CC, June 2016) (hereafter the SHAR 2016) assessed the mitigation provided by key highway schemes from the programme of transport schemes that were considered necessary for the delivery of the Draft Local Plan 2016, including schemes SRN9 and SRN10. See paragraph 3.2.3 in the SHAR 2016.</p> <p>Schemes SRN9 and SRN10 are being promoted to mitigate the</p>

<p>employment uses as proposed for A43 in the Draft Local Plan 2016, was not considered to require a new junction to A3.</p>	<p>impact of the level of strategic planned growth and in particular the development traffic flows resulting from the development of a new settlement at the former Wisley airfield site (site allocation Policy A35), as well as limiting any increase in traffic joining and leaving the A3 at the Ockham interchange.</p> <p>Requirement (4) for the site allocation Policy A35, as proposed in the Draft Local Plan 2017, is that the two new slip roads are the identified mitigation to address the impacts on Ripley High Street and surrounding rural roads.</p>
<p><i>Development of schemes SRN3 and LRN7 in respect of environmental designations:</i></p> <ul style="list-style-type: none"> The development of scheme SRN3 (M25 Junction 10/A3 Wisley interchange 'Road Investment Strategy' scheme) and potentially scheme LRN7 (Interventions to address potential highways performance issues resulting from development at Land at former Wisley airfield site) will need to take into account the designations of the Thames Basin Heaths SPA and the nearby SSSIs at Ockham and Wisley Commons and assist in the achievement of BOA objectives including protection, restoration and creation of priority habitats, especially heathland and acid grassland. 	<p>The development of scheme SRN3 will be subject to the Environmental Impact Assessment regulations including Habitats Regulation Assessment. This scheme will be delivered through the Development Consent Order process, with permission granted by a minister, and will therefore not be subject to the usual development management process.</p> <p>The development of scheme LRN7 would take into account Policy P5 and Policy ID4: Green and Blue Infrastructure of the Draft Local Plan 2017. Policy P5: Thames Basin Heaths Special Protection Area in the Draft Local Plan 2017 applies and sets out the approach to the protection of the SPA. In addition, Policy ID4: Green and Blue Infrastructure sets out the approach to Biodiversity Opportunity Areas (BOAs).</p>

<p>LRN1 Guildford Town Centre Transport Package:</p> <ul style="list-style-type: none"> • Further details are required of scheme LRN1 ‘Guildford Town Centre Transport Package’ in order to understand if the scheme involves restructuring of the Guildford gyratory – which will reduce its capacity, to assess its impact and to understand its relationship with the draft masterplan. 	<p>The committed scheme LRN1 ‘Guildford Town Centre Transport Package’ is comprised of a number of component schemes as identified in the Infrastructure Schedule at Appendix C.</p> <p>The Guildford Town Centre Transport Package: Full Business Case Submission to EM3 LEP (Surrey County Council, February 2016) is available on Surrey County Council’s website and provides further details of the component schemes.</p> <p>The only component scheme that will potentially cause a deterioration in the vehicular performance of the Local Road Network is the experimental closure of Walnut Tree Close. Surrey County Council and Guildford Borough Council undertook a public consultation on two proposals in Summer 2016.</p> <p>The Millbrook car park junction improvement scheme, which is also a component scheme, is expected to have a positive impact on the vehicular performance of the Local Road Network, specifically the gyratory, by removing the requirement for exiting vehicles to circuit the Guildford gyratory.</p> <p>The other component schemes will realise improvements for buses, pedestrians and cyclists in the urban area of Guildford, including in the vicinity of the Guildford gyratory.</p> <p>The Guildford Town Centre and Hinterland Masterplan Report (Final draft report for consultation, October 2015) was prepared by a consultant team led by Allies and Morrison Urban Practitioners. The Council’s Executive, in March 2016, agreed a recommendation as follows: ‘That the Executive approves the Town Centre Masterplan prepared by Allies & Morrison and the extensive consultation as a guide for the ongoing work of the GBC Major Projects team who will, where appropriate, present proposals in a manner that is compatible with the Local Plan and planning requirements.’</p>
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	<p>The draft masterplan is neither a Development Plan Document nor a Supplementary Planning Document. The document has limited, if any, weight as a material consideration in planning terms.</p>
<p><i>LRN3 and LRN 4 Blackwell Farm Access:</i></p> <ul style="list-style-type: none"> • Scheme LRN3 ‘New signalised junction from Blackwell Farm site to A31 Farnham Road’: <ul style="list-style-type: none"> • Flaw is that A31 as it approaches the A3 experiences congestion and periods of slow moving traffic primarily during the morning peak/gridlocked for large parts of each working day from 6am onwards; this would be exacerbated by traffic signals and development traffic. • Insufficient space within existing public highway limits to accommodate the required widening to at least four lanes through the A31/Down Place junction. • Deliverability of the scheme requires third party land and it has not been demonstrated this can be acquired. • Cost should be amended to include the bridge widening works on the A31 Farnham Road and Down Place. <p>LRN4 Access road at Blackwell Farm site with through link to Egerton Road:</p> <ul style="list-style-type: none"> • Surrey County Council has advised that primary access to the site is via Egerton Road. • Confusion between Guildford Borough Council and Surrey County Council, as Local Highway Authority, as to how the through vehicle link would operate and which access is the primary access into the site. 	<p>The Guildford Borough Proposed Submission Local Plan “June 2016”: Strategic Highway Assessment Report (Surrey CC, June 2016) (hereafter the SHAR 2016) assessed the mitigation provided by key highway schemes from the programme of transport schemes that were considered necessary for the delivery of the Draft Local Plan 2016, including schemes LRN3 and LRN4. See paragraph 3.2.3 in the SHAR 2016.</p> <p>The SHAR 2016 concludes that “The results show that for Scenario 5, which represents the quantum and distribution of development proposed in the Proposed Submission Local Plan together with the key highway schemes, there will not be a severe impact on the local and strategic highway network” (p.62). The addendum to the SHAR 2016 (Guildford BC, June 2017) found that this conclusion was “not considered likely to change” as a result of the key changes made to proposed site policies and to the programme of transport schemes in the Draft Local Plan 2017.</p> <p>It is accepted that the A31 eastbound, as it approaches its junction with the A3 trunk road, experiences congestion and periods of slow moving traffic primarily during the morning peak. This congestion primarily affects the nearside lane of the A31 which then slips onto the A3 trunk road, and to a lesser extent the offside lane which proceeds towards the existing junction with the Down Place access road.</p> <p>It is anticipated that scheme LRN3 will be realised within the highway boundary and/or within land controlled by the developer within the site boundary.</p>

The likely cost for scheme LRN3 is based on a high-level assessment and has been agreed with officer representatives of Surrey County Council. Ultimately what is required, particularly for 'front door' access and Section 106 obligations, will be determined at the planning application stage.

The requirement with respect to a vehicular access has been amended to remove the distinction between primary and secondary vehicular accesses. The requirement, numbered (1), is now that 'Vehicular access to the site allocation will be via the existing or a realigned junction of the A31 and the Down Place access road, which will be signalised, and form the site to Egerton Road, preferably via Gill Avenue.'

The requirement with respect to the through vehicular link has been amended to state that it will be controlled. The requirement, numbered (4), is now that '(1) A through vehicular link which will be controlled is required via the above accesses between the A31 Farnham Road and Egerton Road to provide a new route for employees and emergency services to the Surrey Research Park, the University of Surrey's Manor Park campus and the Royal Surrey County Hospital, as well as a choice of vehicular access for the new residents/occupiers. This will reduce impact on the A31/A3 junction, in advance of the delivery of Highways England's A3 Guildford scheme'.

There are various practical ways in which controlled vehicular links have been implemented.

<p>LRN21 New road bridge and footbridge scheme to enable level crossing closure on A323 Guildford Road adjacent to Ash railway station:</p> <ul style="list-style-type: none"> • If the proposed bridge is part of the infrastructure, required to accommodate the proposed developments in the area, should it not be in place before construction on the dwellings commences? <p>Not clear how the bridge will be delivered due to pooling restrictions.</p> <p>Justification for this scheme has not been provided.</p>	<p>Policy A29 ‘Land to the south and east of Ash and Tongham’, as amended in the Draft Local Plan 2017, includes a requirement, numbered (9) for ‘Land and provision of a new road bridge which will form part of the A323 Guildford Road, with an associated footbridge, to enable the closure of the level crossing on the A323 Guildford Road, adjacent to Ash railway station’.</p> <p>Policy ID1 requires, at point (3), that ‘If the timely provision of infrastructure necessary to support new development cannot be secured, planning permission will be refused’. When determining planning applications, and attaching appropriate planning conditions and/or planning obligations, regard will be had to the delivery and timing of delivery of the key infrastructure, or otherwise alternative interventions which provide comparable mitigation’.</p> <p>Developer funding and funding from Network Rail is expected to fund scheme LRN21, as shown in the Infrastructure Schedule at Appendix C. Where pooling restrictions may be a factor a judgement is made on whether the scale of development in a particular local area to the scheme will trigger the requirement to fund a scheme via Section 106 agreements.</p> <p>The Guildford Borough Proposed Submission Local Plan “June 2016”: Strategic Highway Assessment Report (Surrey CC, June 2016) (hereafter the SHAR 2016) assessed the mitigation provided by key highway schemes from the programme of transport schemes that were considered necessary for the delivery of the Draft Local Plan 2016, including scheme LRN21. See paragraph 3.2.3 in the SHAR 2016.</p> <p>The SHAR 2016 concludes that “The results show that for Scenario 5, which represents the quantum and distribution of development</p>
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	<p>proposed in the Proposed Submission Local Plan together with the key highway schemes, there will not be a severe impact on the local and strategic highway network” (p.62). The addendum to the SHAR 2016 (Guildford BC, June 2017) found that this conclusion was “not considered likely to change” as a result of the key changes made to proposed site policies and to the programme of transport schemes in the Draft Local Plan 2017.</p>
<p><i>LRN22 - East Horsley and West Horsley traffic management and environmental improvement scheme:</i></p> <ul style="list-style-type: none"> It is not clear what is proposed for this scheme, and its timing and funding have to be considered uncertain. It is stated that funding will, at least in part, come from developer contribution. However, it is not at all clear what development is likely to give rise to such a contribution. 	<p>Scheme LRN22 is included in the Infrastructure Schedule in recognition that the housing development around East and West Horsley will have a material impact on local roads including B2039 and East Lane. It is envisaged that money will be taken from future developments for site allocation policies A37, A38, A39 and A40 through Section 106 agreements in order to mitigate the traffic and environmental impacts of these developments or alternatively the scheme will be funded through CIL.</p>
<p><i>SMC 1-6 Sustainable Movement Corridor route sections:</i></p> <ul style="list-style-type: none"> Sustainable Movement Corridor is only shown as a concept and requires justification and detailed development. <p>The need for a ‘corridor’ is unproven and there is no quantification of potential demand to use the Sustainable Movement Corridor, also securing funding from Local Growth Fund requires an economic justification.</p> <p>The ability to deliver rapid bus services in peak periods has not been demonstrated and could not be delivered due to narrow roads and pinch points. The concepts state that ‘type 2’ design format of bus priority measures introduced at congested sections and junction will be challenging because road width on several sections will limit what can be achieved</p>	<p>The Sustainable Movement Corridor is considered necessary to deliver the level of strategic planned growth in the Guildford urban area in a sustainable way. It is considered that the transport strategy will mitigate the principal transport impacts of proposed planning growth in the borough during the period to 2034.</p> <p>Guildford Borough Council is undertaking a major study to design for the route sections of the Sustainable Movement Corridor.</p> <p>The Enterprise M3 Local Enterprise Partnership has made a provisional allocation of £12.5 million for various projects in Guildford borough, including around £3.9 million for elements of the Sustainable Movement Corridor: West route section (scheme reference: SMC1). It is proposed that Guildford Borough Council will also make a</p>

<p>without a major impact on other traffic. Scheme will increase existing congestion route through London Road in Burpham disadvantaging vehicles at huge cost and with little benefit.</p>	<p>contribution. Surrey County Council and Guildford Borough Council consulted on proposals for elements of SMC1 in September–October 2017 to inform the decision as to which elements should be delivered first, with the rest of SMC1 delivered in the future when further funding is secured. A business case for those elements to be funded by the LEP and the Council is to be submitted to the LEP in November 2017.</p> <p>This sentence in paragraph 4.6.24 has been amended in the Draft Local Plan 2017 to state that ‘The aim is for journeys to be rapid and reliable by bus and safe and direct on foot and by bike’.</p> <p>The design of scheme SMC6 ‘Sustainable Movement Corridor: East’ is currently at ‘concept’ design stage.</p>
<p>BT1 – New Guildford town centre bus facilities:</p> <ul style="list-style-type: none"> Detail on scheme BT1 is required as fluid and uncertain proposal is effectively meaningless. <p>Absence of a site for a bus station in Draft Local Plan providing a focus for town centre bus services and the Sustainable Movement Corridor is a serious weakness.</p> <p>Improvement of bus connections to Guildford rail station is also needed with bus interchange between buses and rail at/near Guildford rail station.</p>	<p>The Draft Local Plan 2017 allows for different options for the provision of scheme BT1 ‘New Guildford town centre bus facilities’. This scheme relates to site allocation Policy A6 ‘North Street redevelopment, Guildford’. This site includes the existing bus station and therefore, with potential redevelopment of this site for a mixed use scheme, the bus interchange facilities are to be provided in a suitable alternative arrangement to be located either partly or wholly on or off site. Any new facilities will need to be designed in conjunction with Surrey County Council and the bus operators.</p> <p>The replacement Walnut Bridge, a component of scheme LRN1, will provide an improved walking and cycling route between Guildford rail station and the retail heart of the town centre, where the present Guildford bus station is located.</p> <p>In addition, a Guildford Station Capacity Study is being undertaken by Network Rail and Guildford Borough Council and will review walking and cycling connections from Guildford rail station to the rest of the town centre including the present Guildford bus station.</p>

<p><i>WS1 Water Supply:</i></p> <ul style="list-style-type: none"> Upgrade to water supply network capacity to support the former Wisley airfield strategic site – Site promoter states that procurement of new water supply (including reinforcement of existing) and contributions by developers are controlled by mechanisms within the Water Industry Act 1991 and that developer contributions are generally offset against future revenue, and suggests consideration be given as to whether this scheme is required in Infrastructure Schedule. 	<p>This scheme will remain listed, as it is infrastructure that will need to be delivered to support the scale of development proposed.</p>
<p><i>WCT1 and WCT2 Wastewater connections and treatment:</i></p> <ul style="list-style-type: none"> WCT1 Upgrade to the foul water network connections to the former Wisley airfield site to provide sufficient capacity – Site promoter states that procurement of new sewerage (including reinforcement of existing) and contributions by developers are controlled by mechanisms within the Water Industry Act 1991 and that developer contributions are generally offset against future revenue, and suggests consideration be given as to whether this scheme is required in Infrastructure Schedule. <p>WCT2 Upgrade of capacity at Ripley sewage treatment works to serve increased flows from Wisley former airfield strategic site – Site promoter states that sewage treatment capacity should be provided by Sewerage Undertakers for the planned development in the STW catchment and that any necessary upgrades are normally funded by the Sewerage Undertaker through the AMP process agreed with Ofwat every five years, and suggests consideration be given as to whether this scheme is required in Infrastructure Schedule.</p> <p>The Hockford Sewage works have been omitted from para 3.6 of the Infrastructure Study in error.</p>	<p>This scheme will remain listed, as it is infrastructure that will need to be delivered to support the scale of development proposed.</p> <p>Omission of Hockford Sewage works will be picked up through amending the IDP.</p>

<p><i>FRR3 – Flood risk reduction - surface water mitigation measures:</i></p> <ul style="list-style-type: none"> • FRR3 Minimising surface water flood risk at the strategic site at Wisley former airfield – Site promoter states that surface water drainage is to be designed in accordance with the SuDS Manual (CIRIA Report C753, November 2015) and the Non-Statutory Technical Standards for Sustainable Drainage Systems (Defra, March 2015), and suggests consideration be given as to whether this scheme is required in Infrastructure Schedule. 	<p>It is considered that scheme should remain listed, as it is infrastructure that will need to be delivered to support the scale of development proposed.</p>
<p><i>ES1 – Emergency Services:</i></p> <ul style="list-style-type: none"> • ES1 Neighbourhood Policing Centre on-site at Former Wisley Airfield site – Site promoter states that this is potentially to be accommodated in conjunction with other community space provision and suggests that the reference to size be deleted. 	<p>The size reference has been retained, as there is nothing to prevent it being delivered in a different way with agreement from the Police if justified, but this gives a useful indication about the scale of provision that is likely to be needed to meet their needs.</p>
<p><i>Representations on transport schemes that are advocated, but not currently included in DLP:</i></p>	
<p><i>Rail and river crossing Guildford Vision Group Bridge:</i></p> <ul style="list-style-type: none"> • The Draft Local Plan should include a new road bridge, as promoted by the Guildford Vision Group, crossing the railway lines and the River Wey, running between Guildford Park Road and York Road in order to link the physically divided town; including safeguarding or leaving ‘undeveloped’ land to the north of the station required for the delivery of the road bridge. <p>This would provide relief to the Farnham Road bridge and the A3 trunk road between the Dennis interchange and the Cathedral / University interchange, and could be supported by potential downgrading of the Guildford gyratory system.</p>	<p>It is not considered that a new road bridge, as promoted by the Guildford Vision Group (GVG), is a key infrastructure scheme on which the delivery of the Local Plan depends.</p> <p>Arup appraised an option for a town centre road system redesign, including a GVG road bridge concept, in the Guildford Town and Approaches Movement Study (March 2015). The scheme did not form part of Arup’s recommended long-term movement strategy to 2050 for the town of Guildford.</p> <p>Arup (June 2015) subsequently prepared an initial ‘Order of Cost Estimate’ for the GVG road bridge concept including the</p>

reconstruction of the Farnham Road Bridge, for both dual and single lane carriageway options. The purpose of an order of cost estimate is to establish if the proposed project is affordable, and if affordable, help to establish a realistic cost limit for the project. The dual carriageway option was estimated at £103,469,000. The single carriageway option was estimated at £72,804,000. These costs excluded various items including land costs, Compulsory Purchase Order costs and statutory services diversions. The base date for the Order of Cost Estimate was first quarter of 2015. As an initial 'Order of Cost Estimate' and depending on a more defined final project brief and scope, the final cost of the agreed works cost may vary by - 45% to +45%. In the absence of a risk analysis, Arup applied a generic 15% risk allowance to cover design, construction and employer risk for the capital cost works only. Arup did not apply an optimism bias to this capital cost estimate and would expect this to be included within the whole project cost / overall development forecast.

WSP | Parsons Brinckerhoff (November 2016), on behalf of Guildford Borough Council, assessed the traffic impacts of the GVG road bridge concept using the 2011 Paramics base model for Guildford town centre. The GVG road bridge concept was represented as a single carriageway bridge over the railway and River Wey. The present Guildford gyratory is part converted into a restricted access shared space area with the remainder reverting to two-way traffic operation with, in option 1, Town Bridge brought back into use with two-way access in place of Friary Bridge, and, in option 2, two-way access is retained across Friary Bridge.

WSP Parsons Brinckerhoff conclude as follows: 'The results of this modelling exercise demonstrate that the proposed options reduce the capacity of the highway network, most notably the capacity for north-south movements through the town. From the north beginning at the new signalised junction of the GVG road bridge link and York Road, and from the south at the junctions with Portsmouth Road, Millbrook and Farnham Road, where traffic flows are reduced compared with

	<p>the base model.’ (p.22). WSP Parsons Brinckerhoff continue: ‘In effect traffic currently routing north and south through the town centre via Onslow Street is displaced onto the Guildford Park Road, on top of the existing traffic movements already using this route. The outcome is that the volume of traffic carried along this route is unable to clear the junctions that intersect the route as peak hour traffic flow builds, resulting in queuing back from each junction with secondary impacts downstream. These secondary impacts include increased flows on Agraria Road, Wodeland Avenue/Mount Pleasant, Sydenham Road/Quarry Street, the High Street and London Road, principally to shortcut some of the delays on Farnham Road, Millbrook, York Road, Woodbridge Road and the gyratory’ (p.22).</p>
<p><i>Road safety improvement between Station and town centre:</i></p> <ul style="list-style-type: none"> • There is a requirement for improvements to road safety, focused on the pedestrians and cyclists, on in the area and on the routes between Guildford railway station and the Friary Centre in Guildford town centre. 	<p>The replacement Walnut Bridge, a component of scheme LRN1, will provide an improved walking and cycling route between Guildford rail station and the retail heart of the town centre, including the Friary Centre.</p> <p>In addition, Surrey County Council is planning a road safety improvement at the pedestrian crossings at the junction of Bridge Street and Onslow Street. This is proposed for delivery in 2018/19.</p>
<p><i>Realistic and effective plan to manage traffic impacts is required for Guildford town centre:</i></p> <ul style="list-style-type: none"> • A realistic and effective plan to manage traffic in and around Guildford town centre is required as the proposals may make traffic conditions in Guildford town centre worse. 	<p>The Spatial Vision, as amended by the Draft Local Plan 2017, states that ‘The transport strategy and Local Plan policies will be aligned to encourage residents, employees and visitors to use alternative modes of transport and to seek to reduce car traffic especially through the town.’</p> <p>There are a number of transport schemes identified for Guildford town centre, in part or in whole. As amended by the Draft Local Plan 2017,</p>

	<p>these schemes are NR1, LRN1, LRN23, SMC2, SMC3, SMC4, BT1, AM1 and AM2.</p> <p>Points (3), (4), (5) and (11) of Policy ID3 Sustainable transport for new developments are of particular relevance to transport in Guildford town centre.</p> <p>The Council operates many of the town centre car parks, the Park and Ride sites and manages on-street parking for Surrey County Council, and so is also able to influence patterns of travel by car through its joint parking strategy with Surrey County Council.</p>
<p><i>Southbound and northbound slip roads at Ockham Roundabout:</i></p> <ul style="list-style-type: none"> • South-facing slip roads to the A3 trunk road at the Ockham interchange/roundabout should be provided. 	<p>New north facing junctions to the A3 are proposed at the A247 Burnt Common interchanges, referenced as schemes SRN9 and SRN10. These junctions are being promoted to mitigate the impact of the level of strategic planned growth and in particular the development traffic flows resulting from the development of a new settlement at the former Wisley airfield (site allocation Policy A35), as well as limiting any increase in traffic joining and leaving the A3 at the Ockham interchange.</p> <p>The new north facing junctions will encourage traffic to use the Strategic Road Network and A roads rather than rat-runs on minor roads.</p> <p>The schemes are preferred to south-facing slip roads to the A3 at the Ockham interchange.</p>

<p><i>Health and social care: existing infrastructure at capacity:</i></p> <ul style="list-style-type: none"> Doctors' surgeries / health care / medical facilities / hospitals / dental facilities will not be able to cope/already under a severe load / already at capacity, so unsustainable. Areas mentioned include Send, Ripley, Horsleys (Horsley Medical Centre), Villages Medical Centre. <p>Object to lack of immediate provision of doctors' surgeries / GP surgeries / health care. DLP takes no account / has no regard of doctors' surgeries that already operating at capacity / already problems with GP access, additional medical or hospital facilities required. No provision for General Health services, additional medical or hospital facilities.</p>	<p>GBC have engaged lead agencies, including the relevant Clinical Commissioning Groups, GPs and NHS England as part of its cooperation efforts. These engagements helped inform the compilation of the Infrastructure Delivery Plan and Infrastructure Schedule.</p> <p>There has been significant consideration of the infrastructure needed to support the Proposed Submission Local Plan. An Infrastructure Delivery Plan (IDP) provides detail on the infrastructure needed to support the development included in the IDP (see section 6 regarding health and social care facilities). This has informed the detailed preparation of the Infrastructure Schedule at Appendix C of the Local Plan, which includes proposals for a number of expanded or new health facilities. This includes GP surgery provision to service identified strategic sites.</p> <p>The IDP is regarded as a live document, which will be reviewed and modified as required throughout the plan period as further information becomes available.</p>
<p><i>HSC4 – Health and Social Care:</i></p> <ul style="list-style-type: none"> HSC4 – GPS surgery with pharmacy at the Former Wisley airfield site – Site promoter requests replace “GP surgery with pharmacy” with “appropriate healthcare provision, potentially including GP surgery with pharmacy”. 	<p>The wording has been retained, as there is nothing to prevent it being delivered in a different way if justified with agreement from the CCGs/health providers, but retaining it in the schedule gives a useful indication about the sort of facility that may be necessary.</p>

<p><i>School infrastructure planning and delivery-Existing infrastructure at capacity:</i></p> <ul style="list-style-type: none"> • Object to lack of immediate provision for new schools. Schools will not be able to cope and are already at capacity, including resulting in children being allocated to schools a significant distance away such as Dorking or Woking. Areas mentioned include West Horsley – further primary school provision required, Send, Ripley, Raleigh School. <p>It would be helpful if Appendix C reflected indicative dates for secondary school provision in alignment with when development is likely to come forward.</p>	<p>As part of GBC cooperation with infrastructure providers, Surrey County Council reviewed proposed growth (see for instance Infrastructure Delivery Plan, 206: 5.19-5.20). They are satisfied that the education need can be met.</p> <p>The need for secondary education will need to be reassessed at the time a planning application is determined (as set out in the site allocations policies). It is therefore not known at this stage when they will be required. The IDP is a living document and will be updated.</p>
<p>Representations from Prescribed Bodies and Selected Stakeholders (2017 Consultation)</p>	
<p>Highways England</p> <ul style="list-style-type: none"> • In its representation on the Draft Local Plan 2017, under headings referencing policies A35, A43, A43a, A58, Appendix C and the Transport topic paper, stated that: ‘As stated in our letter dated 5 October 2017, it remains unclear if the two new slip roads at A247 Clandon Road (Burnt Common) are deliverable and what the conditional requirements are to enable the proposals to progress. It is not clear if proposals set out in Policy A43 (and now additionally Policy A58 and A35) are dependent on GBC’s aspirations set out in A43a. Appendix C Infrastructure Schedule notes that the Burnt Common slip road scheme will be wholly developer funded. To date we do not have any evidence that such an improvement is deliverable and could be designed in conformity with the Design Manual for Roads and Bridges. We would welcome further discussions on these policies. <p>We understand that the Wisley Airfield site is expected to go</p>	<p>Schemes SRN9 and SRN10, allocated in Policy A43a, are being promoted to mitigate the impact of the level of strategic planned growth and in particular the development traffic flows resulting from the development of a new settlement at the former Wisley airfield site (Policy A35), as well as limiting any increase in traffic joining and leaving the A3 at the Ockham interchange. Requirement (4) for the site allocation Policy A35, as proposed in the Draft Local Plan 2017, is that the two new slip roads are the identified mitigation to address the impacts on Ripley High Street and surrounding rural roads.</p> <p>The Council considers that site allocation Policy A43, as well as Policy A58, are not directly dependent on schemes SRN9 and SRN10, allocated in Policy A43a. Rather, as stated above, the Council has planned on the basis that these schemes will be delivered by the developer of the former Wisley airfield site (Policy A35) and that this will be ‘when first needed to serve the development’s occupants and users and/or to mitigate its otherwise adverse material impacts’ (Policy ID1 at point (1)).</p>

<p>to Planning Appeal in September 2017 which will likely have implications for the soundness of these policies, therefore discussions are urgent if proposals are reliant upon the improvement set out in A43A [sic] that is being promoted by Guildford Borough Council and Surrey County Council.’ [Second paragraph in text box in the original.]</p>	<p>In producing a new Local Plan for its area, Guildford Borough Council as the local planning authority is required to allocate sites for development (NPPF, 2012: paragraph 157) and to assess the quality and capacity of infrastructure for transport and its ability to meet forecasts (NPPF, 2012: paragraph 162). The Submission Local Plan’s spatial strategy and key infrastructure schemes, as included in the Infrastructure Schedule, have been planned together and are interdependent in various ways. In short, the spatial strategy as proposed is dependent on the key infrastructure schemes as proposed.</p> <p>Guildford Borough Council considers that schemes SRN9 and SRN10, allocated in Policy A43a, are deliverable. Work is ongoing to demonstrate the Council’s position.</p>
<p><i>Representations on Specific Issues (2017 Consultation)</i></p>	
<p><i>Deletion of Surrey County Council as responsible for delivery of various Local Road Network schemes:</i></p> <ul style="list-style-type: none"> • Query rationale for change by which Surrey County Council is deleted as being responsible for delivery for a number of the schemes on the Local Road Network, and ask whether this is due to lack of funds or belief that nothing more required. 	<p>Surrey County Council requested in their representation to the Draft Local Plan 2016 that Surrey County Council should be deleted from the “Delivered by” column for various transport schemes ‘that are entirely the responsibility of a given developer’.</p>

SRN2 and SRN3: wording change, describing responsibility for funding and source:

- Concerned by the changes to the identified funding source for schemes SRN2 and SRN3 from 'Highways England and developer contributions' to 'Highways England and developer funded' in the Draft Local Plan 2017. Whilst the term 'developer funded' implies more financial commitment than 'developer contribution' which is welcome in respect of road network improvements which are required as a direct result of new housing, concerned that this may lead to a reduction of the proportion of affordable housing delivered. This concern is, in part, due to a change in paragraph 4.2.40, where there is some softening of the language around the issue of developers needing to demonstrate lack of economic viability of affordable homes in order to reduce their standard quota of at least 40%. This concern also applies to other developer funded schemes including scheme AM3 'Off site cycle network from the Land at former Wisley airfield site to key destinations...'

In the Draft Local Plan 2017, in the Infrastructure Schedule at Appendix C, all instances of 'developer contributions' were changed to 'developer funded' in the column for 'Likely cost (where known) and funding source'. The term 'developer funded' encompasses:

- direct improvements made by developer(s) including under a S278 Agreement (Highways Act 1980)
- funding provided by developer(s) by way of Section 106 agreement (Town and Country Planning Act 1990)
- funding provided by developer(s) by way of Community Infrastructure Levy (CIL) contributions.

Therefore the Infrastructure Schedule provides flexibility as to the means by which appropriate schemes will be, in part or in full, developer funded. Further consultation on CIL will be undertaken in preparation for introducing the levy in Guildford borough. The Regulation 123 list (to be developed) is intended to provide greater clarity on what infrastructure items CIL may be spent on and where Section 106 obligations would not be sought.

The response to issues raised with the changes to paragraph 4.2.40 in the Draft Local Plan 2017 are set out in the Policy H2 consultation statement.

<p>SRN6: Beechcroft Drive:</p> <ul style="list-style-type: none"> Object to the deletion of infrastructure project SRN6 'Beechcroft Drive new access road/road safety scheme' from the Draft Local Plan 2017. The current access – a 90-degree junction on a blind bend of the A3 – is dangerous not just to the residents of Beechcroft Drive, but to all drivers travelling on the A3 trunk road. 	<p>It is not considered that this scheme is a key infrastructure scheme on which the delivery of the Local Plan depends.</p> <p>Given this, and Highways England's advice that these schemes 'are not committed proposals' and therefore that 'they are not schemes that can be relied upon to be delivered within the plan period' (Highways England, 5 October 2016: p.2), we have removed this scheme from the Infrastructure Schedule.</p> <p>Highways England is proposing to undertake detailed design work on this scheme. The detailed design work is funded. However, there is no certainty of funding for the works.</p> <p>Nevertheless, we do consider that the scheme SRN2 'A3 Guildford (A320 Stoke interchange junction to A31 Hog's Back junction) 'Road Investment Strategy' scheme' would likely include changes to the existing access at Beechcroft Drive.</p> <p>This scheme remains under development and consideration by Highways England and accordingly we have included it as an 'aspirational' scheme in the Guildford Borough Transport Strategy 2017 (Guildford Borough Council, December 2017).</p>
<p>SRN9 and 10 north facing junctions to the A3 at A247 Clandon Road (Burnt Common) – Change in responsibility for delivery:</p> <ul style="list-style-type: none"> Notes the change in responsibility in the Draft Local Plan 2017 for delivering schemes SRN9 and SRN10 from 'Surrey County Council and/or Highways England and/or developer' to 'Highways England and/or developer' and concerned that if the schemes were delivered by Highways England alone there would be no local level control over if/when/how the schemes were delivered. 	<p>Surrey County Council requested in their representation to the Draft Local Plan 2016 that Surrey County Council should be deleted from the "Delivered by" column for various transport schemes 'that are entirely the responsibility of a given developer'. Accordingly, for those elements of infrastructure that are entirely the responsibility of a given developer, Surrey County Council has been deleted from the "Delivered by" column.</p> <p>In the Draft Local Plan 2017, the 'delivered by' column for both schemes SRN9 and SRN10 accordingly reads 'Highways England and/or developer'.</p>

Appendix D and Q1: Evidence base – employment, retail and Town Centre

Main Issue	Guildford Borough Council Response
<i>Representations on Specific Issues</i>	
<p><i>Employment / ELNA:</i></p> <ul style="list-style-type: none"> 80% reduction in employment floorspace need from previous ELNA. 	<p>The Employment Topic Paper compares the methodologies and results of previous ELA and ELNA.</p>
<ul style="list-style-type: none"> Evidence base (Employment Land Needs Assessment 2015) as flawed and inconsistent and therefore unreliable evidence. <p>ELNA figure undermined by Brexit.</p> <p>Reduce growth forecast due to referendum.</p>	<p>A new ELNA has been produced using exactly the same methodology but with new economic forecasts published after the vote on membership of the European Union.</p>
<ul style="list-style-type: none"> Evidence base is unreliable/poor/flawed. <p>GBC have not provided sound evidence on the Employment Land Needs Assessment.</p> <p>Post Brexit - with its economic uncertainties renders all the data used for this Policy unreliable.</p> <p>Policy based on shaky and obsolete (pre-referendum) data.</p>	<p>The history of the published (an unpublished ELNA) is set out in the Employment Topic Paper. The approaches that each study has taken are described and the findings of each are compared.</p> <p>The ELNA has been updated to account for economic forecasts updated and published after the European Union Membership Referendum held in June 2016 in order to ensure it is as up-to-date as possible.</p> <p>Consultants AECOM, who are experienced in producing evidence to support Local Plans, have produced the ELNA.</p>

<ul style="list-style-type: none"> There is unclear differentiation between B Class uses/clustering all B classes. 	<p>Section 1.2 of the ELNA sets out the approach taken in the document by consultants AECOM. It considers all commercial and industrial uses falling into use classes B1 (a, b and c), B2 and B8 of the Use Classes Order 1987 (as amended). It does not consider the need for land/buildings used for health, education, retail or leisure purposes, and also excludes offices provided mainly to visiting members of the public that fall into the A2: Financial and Professional Services use class.</p> <p>AECOM assessed 'office/R&D' (including B1a and B1b use classes) and 'industrial/storage' (including B1c, B2 and B8 use classes) independently. This is because the majority of employment areas in Guildford borough include either offices (mainly B1a sometimes with B1b) or industrial estates serving industrial firms (general industry - B2, light industry - B1c and storage and distribution – B8). In addition, demand forecasts and historic data on employment and employment floorspace are split into office/R&D or industrial/storage categories.</p>
<ul style="list-style-type: none"> The ELNA uses post Brexit economic forecasts around which there is uncertainty <p>There should be:</p> <ol style="list-style-type: none"> Interrogation of the forecasters' Brexit assumptions Assessment of the Brexit impacts on Guildford's economy Sensitivity testing against recessionary and non-recessionary job growth rates Avoidance of double counting of Brexit impacts on demographics and economic forecasts Consideration of M3 LEP objectives 	<p>The forecasts represented the best available information available at the time of the assessment. They take into account past trends, as well as future expected performance of sectors. There clearly remains uncertainty regarding what Brexit deal will be negotiated and the impact on the UK economy, but the appropriate way to address this is to monitor dynamics, and review local plans over time – a plan, monitor and manage approach.</p> <p>There is no issue of double counting of Brexit impacts, not least as the demographic analysis does not include a specific 'Brexit' adjustment. International migration in the longer-term is simply judged by reference to longer-term trends.</p>

- The amount of employment land that is required to meet need, which is considered to be underestimated.

Additional 10.5-20ha of 'B' use class floorspace to meet objectively assessed need. It then goes on to state that currently the Borough has the potential to deliver 7.4ha from existing urban and settlement locations, which is not enough to meet need. To put this in context 20ha of land would only equate to 1.27ha per annum over the plan period. More than 50% of the firms which responded to this survey expected their floor space requirements to increase over the next 10 years,

ELA has artificially reduced the requirement for additional employment floorspace. This is odd considering that there has been no notable commercial development since 2008,

This artificial reduction is compounded by the assumption that working from home will increase, which is likely to be the case, yet demand for B1(a) accommodation remains a constant and supply is diminishing with the loss of offices to residential use, and homeworking for B2, B8 and B1(c) industries is not practical. Therefore, this conclusion seems rather unrealistic.

Assumption in the document that unimplemented permissions will create the additional land required for development, as will existing vacant accommodation. However, this is overly simplistic and a dangerous strategy to rely on. Some of the vacant accommodation will be lost to other uses, and indeed may be more suitable to other uses, and the amount of vacant accommodation in the Borough is not a constant.

Such a policy does not therefore allow for growth and also does not take into consideration that some of the vacant,

Consultants AECOM have produced both the 2015 and 2016 ELNA and have used their standard methodology for converting the forecast increase in workers to the amount of floorspace required to meet the needs.

The ELNA does not assume that all unimplemented permissions will create the additional land required for development, as will existing vacant accommodation. It simply highlights this as a potential supply but acknowledges that it may not come forward for this use. AECOM use a "frictional vacancy rate" of 8% which they suggest is required for the "optimum level of surplus capacity in the market at any given time".

Guildford town centre remains our preferred location for this type of development, however we have only been able to identify a limited number of sites which we believe are likely to come forward for development over the plan period. This has resulted in us having to search a wider area.

B1a/b space will also be delivered at Blackwell Farm, Gosden Hill and the Former Wisley Airfield as part of mixed-use developments along with The Pirbright Institute, Surrey Satellite (outstanding planning permission), the and on the new site as Send Business Park. Industrial space will be delivered at the Burnt Common Warehouse site and as part of the Slyfield development.

<p>outworn accommodation is simply no longer desirable for commercial purposes and therefore is better placed for redevelopment to other uses, some of which will be under permitted development rights. There is also limited ability for existing employment areas in the Borough to intensify. The majority of the Borough's stock comprises of developed estates with little or no expansion capacity.</p> <p>It is clear on the basis of the very real need identified for commercial development that there is a need to identify suitable sites outside of the main urban areas and settlement boundaries, which the Local Plan seeks to do. It is important that this is integrated within largescale new housing developments as sustainable growth across the Borough and balanced communities based on mixed use principles. It is also essential that an adequate amount of land is allocated, as too little land will stagnate the Borough's economic growth and development is needed to attract growth and jobs.</p>	<p style="text-align: center; opacity: 0.5; font-size: 48px; font-weight: bold;">Draft</p>
<ul style="list-style-type: none"> The Council have adopted an unambitious target for land use efficiency. The targets show land use efficiency no better than national averages. 	<p>The employment topic paper sets out the findings of the 2013, 2014 (unpublished), 2015 and 2017 ELA/ELNA and compares them. The 2013 and 2014 ELA were produced by Guildford BC and used a different methodology. In these the estimate for the net additional floor space required was calculated by multiplying the forecast change in the number of workers by the amount of floor space (measured in sq m per worker) using standard figures. Appendix F of the 2013 ELA: Translating employment forecasts to employment floor space sets out the detail.</p> <p>In contrast, in the 2015 and 2017 ELNA AECOM compared the historic change in number of employees between 2004 and 2012 in the property market area to the historic change in floorspace in the same period.</p>

<p><i>Town centre / Master Plan:</i></p> <ul style="list-style-type: none"> • Need to satisfactorily address the gyratory traffic congestion, traffic accidents and air pollution. Preferred Scenario 2 of the Allies and Morrison plan will reduce traffic capacity by over 30% in the town centre thus reducing accessibility and the commercial success of the town with little environmental gain. 	<p>No significant changes to the highway network are planned in the town centre. The Guildford Town Centre and Hinterland Masterplan Report prepared by Allies and Morrison does not form part of the evidence base for the Proposed Local Plan (2017). This has been removed in the Proposed Local Plan version.</p>
<ul style="list-style-type: none"> • No fully comprehensive origin and destination study of traffic into and out of Guildford that should form the basis for traffic infrastructure requirements. 	<p>Origin and destination surveys focused on the Gyratory were undertaken in 2011 and 2014.</p>
<ul style="list-style-type: none"> • Bridge over the river and railway from York Road to link to Madrid Road and Guildford Park Road together with a tunnel under Bright Hill to link York Road to Millbrook has not been properly investigated. 	<p>The Council does not consider that the Guildford Vision Group proposal is key infrastructure on which the delivery of the Local Plan depends.</p>
<ul style="list-style-type: none"> • No proposal to comprehensively plan the Walnut Tree Close area to maximise its' residential potential. 	<p>An experimental closure on Walnut Tree Close (restricting through traffic from the A25 using WTC to access the gyratory) is planned for Autumn 2017. This is likely to reduce traffic using the Gyratory; the results of the closure will inform the decision of whether to implement the closure permanently and the interaction with the Sustainable Movement Corridor.</p>
<p><i>Retail and Leisure:</i></p> <ul style="list-style-type: none"> • Guildford is more than adequately provided for in the provision of retail. Further development in this area should be scrapped in favour of more appropriate residential units in the town centre which would provide a more conducive environment for residents and visitors alike. 	<p>The Retail and Leisure Study 2014 (and 2017 update) indicate a strong need for new retail space, including food and drink uses and for larger units in the town centre. The retail uses allocated in the Local Plan are in line with this assessment. The NPPF also advises that town centres are the sequentially most preferable area of the borough to accommodate new planned retail floorspace. For more information, see also the Retail and Town Centres Topic Paper (June 2017).</p>

<ul style="list-style-type: none"> • There is an important decision to be taken about retail expansion—which has a low impact on GVA and typically lower skill levels—versus higher GVA sectors of the economy. This is reflected in a general shortfall in specified areas in the Plan for high quality town centre office space to attract large companies and head offices. 	<p>The areas of the plan targeted for the majority of future retail development are in the town centre. The NPPF paragraph 23 recommends directing retail development to town centres as the most sequentially preferable and accessible location to help limit car use for shopping purposes, as well as to ensure the continued vitality and economic viability of the town centre. There are strategic employment areas allocated for higher skilled employment development that generates high GVA such as Surrey Research Park (which is proposed to be extended under policy A26 to include a further 30,000 sq m B1 office floorspace). There are also areas referred to in the ELNA that are better suited to accommodate the type and quantity of employment floor space needed.</p>
<ul style="list-style-type: none"> • Concern that the Settlement Profiles Report is so poor that much of the retail hierarchy has been arrived at without the benefit of a solid local evidence base. The lists of retail centres (town centre, district and local) ignore key leisure facilities such as pubs and restaurants, omit out-of-town retail facilities like supermarkets and retail warehouses (several of which have automatic A1 use) – these two classes are major traffic generators and have been expressly excluded (4.26 and 4.27) – and fail to identify trade counters and motor dealerships in the retail mix. The retail and food and drink floorspace targeted in the local plan do not seem to bear much relationship to the tables in the Topic Paper and underlying evidence base. There is no reference to the relatively low GVA contribution made by retail uses relative to other economic activities. The long-term impact of internet is barely mentioned (although in the underlying paper by Carter Jonas, this is given as a key factor that would result in major changes to the forecast need). 	<p>The retail centres in the hierarchy on page 12 of the Retail and Town Centres Topic Paper (2017) were not derived from the Settlement Profiles Report, but were based upon the NPPF’s definition of shopping centres, i.e. town, district and local centres. These are the areas where national policy advises that new retail development should be concentrated in order to be sustainable. This was the reason for excluding out-of-town or out of centre locations as well as small parades of shops from the hierarchy.</p> <p>The issues of the impact of the growth in internet shopping and of retail providing a lower GVA than employment uses were both addressed in response to comments submitted for the 2016 Submission Local Plan consultation (see above, and in response to comments on Policy E7).</p>

<p><i>Retail Study:</i></p> <ul style="list-style-type: none"> 40% increase in retail is excessive. 	<p>Proposed retail floorspace increase is supported by up-to-date evidence of future need and capacity in 2017 Retail and Leisure Study Addendum/2014 Retail and Leisure Study.</p>
<ul style="list-style-type: none"> Document is dated. 	<p>2014 Retail and Leisure Study was updated in February 2017 Addendum, which has adjusted the forecast floorspace need to take account of up-to-date organisational and consumer requirements as well as the latest population forecasts and local and national trends.</p>
<ul style="list-style-type: none"> The Guildford Retail Study Update lacks credibility and there is no proven case for expanding comparison retail space which is undermined by failure to implement existing retail consents at the North Street development over the last 10 years. It does not take account of changing retail patterns in relation to the threat of the internet and the “clicks and mortar” conflict. The study also assumes a number of logged retail requirements from companies already in liquidation or with national requirements that exclude Guildford. 	<p>The 2017 Retail and Leisure Study Addendum took account of the increase in Internet trading within Appendix 10. It indicates that despite the 16.2% increase in Internet sales since 2015, many of the multiples and traditional high-street retailers are actively seeking larger format bricks and mortar retail units to showcase their full product range. In addition, Guildford town centre is already very successful and has the “critical mass of retail, leisure and other uses to compete for more limited investment and development” (para. 1.35). The town centre ranked 11 in the top 500 British retail centres for vitality in 2014 and was ranked second among the top 5 centres in the South East, after the Bluewater centre in Stone, Kent. (Source: http://www.costar.co.uk/en/assets/news/2014/October/The-UKs-most-and-least-vital-retail-centres/).</p>
<ul style="list-style-type: none"> The requirement to assess need for retail and leisure has not been met. <p>No reliable evidence has been presented that another 45,000sqm of additional retail floorspace is needed. Stated retailer requirements in the 2015 Retail Study are misleading (paragraph 5.29 and Appendix 6).</p>	<p>The evidence base for the need for additional retail floorspace is the 2015 Retail and Leisure Study and 2017 Addendum. This document and the 2015 Retail and Leisure Study are both referred to in the Key Evidence box on page 97.</p> <p>The retailer requirements figure referred to in paragraph 5.29 and Appendix 6 of the 2015 Study is derived from data published by CoStar and is the largest total amount based on a requirements range stated by 64 companies based in the Borough.</p> <p>The latest figures for required floorspace for comparison and</p>

	<p>convenience retail uses are in Appendices 8 and 9 of the Retail and Leisure Study 2017 Addendum, with the forecast need for food and drink floorspace shown in Table 4.3.</p>
<p><i>Allocation A6:</i></p> <ul style="list-style-type: none"> • Retail development has a low GVA. A principal concern on this geographically-constrained site is difficult traffic access <p>The amount of retail development proposed, some 39,000 sq m, is close onto 40 % of current retail and far too great for an already constrained town centre. More specifically the retail forecast used is based on a Consultant's report by Carter Jonas, which has four basic flaws.</p> <ol style="list-style-type: none"> 6. The retail data used is national data, which ignores Guildford's access problems. 7. Internet shopping has had a huge growth in Guildford and many shops have closed. 8. The plan itself does not appear to take into account the existence of an already well-established retail centre (The Guildford Society recognises this and urges the Council to assess the impact, which it does not appear explicitly to have done). 9. Finally, and most importantly, this is a retail forecast for private development to the exclusion of other uses and assuming land is plentiful for all competing uses rather than constrained as it is in Guildford town centre. Guildford, in our judgement, needs a much better balanced solution with housing and town centre employment playing a much larger part. 	<p>The 2017 Retail and Leisure Study Addendum prepared by Carter Jonas identified the need for 46,664 sq m gross of comparison goods retail floorspace in the town centre to 2034, assuming a constant market share, which is less than the 41,000 sq m total that we have allocated for the North Street site. The NPPF advises that town centres are sequentially the most preferable area to accommodate new planned retail floorspace, due to their good accessibility and this is as much the situation in Guildford as in other town centres. The Retail and Leisure Study emphasised the success of the town centre in relation to its high ranking within the South East as a shopping and visitor destination.</p> <p>The issues of the impact of the growth in internet shopping and of retail providing a lower GVA than employment uses were both addressed in response to comments submitted for the 2016 Submission Local Plan consultation (see above, and in response to comments on policy E7). In addition, as mentioned in our previous responses to comments on the Retail and Leisure Study, the Plan already allocates a number of town centre sites including this one for a mix of uses, including an appropriate level of housing development.</p>

Appendix D and Q1: Evidence base – flooding

Main Issue	Guildford Borough Council Response
<p>Representations from Prescribed Bodies and Selected Stakeholders</p>	
<p>Environment Agency</p> <ul style="list-style-type: none"> Infrastructure Delivery Plan – Water quality. Plan does not reflect the evidence submitted in the Infrastructure Delivery Plan for wastewater capacity issues, which may result in an adverse impact on water quality. The Plan is not consistent with the National Planning Policy Framework (NPPF), paragraph 109, and is not justified by a robust evidence base. <p>Flood Risk Sequential and Exception Tests - site allocations and the justification for promoting certain sites. We do not consider that sufficient evidence has been presented in this supporting document to justify the conclusions drawn in the Plan with respect to the allocation of certain sites. Without this evidence the Plan is not justified.</p> <p>Policy P4 – Flooding, flood risk and groundwater production zones. We do not consider that sufficient reference has been made to the impacts of climate change on the flood risks associated with development. We consider that without specific mention of the flood risks associated with climate change that the Plan is not consistent with paragraph 99 of the NPPF.</p> <p>Site Allocation Policies – A5: Jewsons, Walnut Close, Guildford; A13: Kernal Court, Walnut Close, Guildford; and A14: Wey Corner, Walnut Tree Close, Guildford, do not have the evidence on access and egress to support their allocation</p>	<p>Discussions with the Environment Agency resulted in the Council commissioning a Water Quality Assessment to overcome this inconsistency with the NPPF. The Council published this document as part of the evidence base for the 2017 consultation.</p> <p>The Council updated Policy P4 to refer to the requirement for developers to demonstrate, in a site-specific flood risk assessment, that their proposed development will be safe <i>'for its lifetime, taking into account climate change'</i> (para. (2)(c)). It also now requires site drainage systems to be <i>'appropriately designed taking account of storm events up to 1 in 100 year chance of flooding with an appropriate allowance for climate change'</i> (para. (2) (f)).</p> <p>The Strategic Flood Risk Assessment (SFRA) Level 1 and Level 2 provide the evidence needed to justify the conclusions drawn in the plan. The SFRA documents were updated to more clearly explain the approach taken to assessing the flood risk on the allocated sites, which takes into account climate change. The SFRA now advises applicants to consider the Government's latest climate change guidance before submitting a planning application to us if recent national guidance amendments are liable to affect the likelihood of them being able to develop a site safely, taking account of flood risk. Policies for site allocations in the Proposed Submission Local Plan 2017 that are affected by flood risk draw on this evidence by referring to the need for applicants to have regard to the SFRA's recommendations.</p>

<p>in the Plan. Without this evidence the deliverability of these sites is questionable and their inclusion is not consistent with NPPF paragraphs 100-102 of the NPPF.</p>	<p>The Level 2 SFRA has been updated via a 2017 addendum to include specific recommendations for access and egress for the sites in Walnut Tree Close. This document takes account of the advice of the Environment Agency.</p>
<p>Environment Agency <i>SFRA and climate change allowances:</i></p> <ul style="list-style-type: none"> • The new climate change allowances have not been specifically mentioned in the Level 2 SFRA or local plan. However, the majority of allocated sites have detailed modelling where the 1 in 1000 year (0.1% annual exceedance probability) is available, these sites have been assessed against the 1 in 1000 year flood. For the purpose of accuracy and clarity, we recommend that this approach of using the 1 in 1000 year flood event to account for climate change is clearly set out in the SFRA Level 2. • If these sites are adopted, at the planning application stage we would expect an assessment of climate change (using the new allowances) to be undertaken by applicants. We recommend applicants consult with the most recent national climate change guidance including our Thames Climate change guidance. 	<p>The SFRA Level 2 and SFRA Level 1: Flood Risk Sequential and Exception Test documents have both now been updated to explain that this was the approach that these assessments took. We have also clarified that the 1 in 1,000 year modelling used in the Level 2 SFRA takes account of climate change under the Government's previous Flood Risk and Coastal Change guidance published on March 2014.</p> <p>GBC agrees that applicants should consider the Government's new climate change guidance published on 19th February 2016 before submitting a planning application to us if the changes to the advice are liable to affect the likelihood of them being able to develop a site that they are promoting or interested in safely. GBC have recommended in both SFRA documents that they do this.</p> <p>Policies for site allocations in the Proposed Submission Local Plan 2017 that are affected by flood risk refer to the need for applicants to have regard to the SFRA's recommendations. In addition, policy P4 requires that applicants should demonstrate in a site-specific flood risk assessment that their proposed development will be safe for its lifetime, considering climate change.</p>

<p><i>Water Quality Assessment – capacity issues:</i></p> <ul style="list-style-type: none"> We note that your WQA is mentioned on page 345. It is suggested the purpose of this document is just to assess waste water infrastructure. This is only one half of the assessment. The other is considering the environmental capacity of the effluent receiving waters. This environmental capacity consideration has been included as part of the assessment that AECOM has undertaken on behalf of the council. For the sake of accuracy and clarity, we recommend that this is updated to include this aspect of the WQA. 	<p>Proposed minor amendment to Appendix D: Evidence Base to include the additional information requested by the respondent.</p>
<p><i>Representations on Specific Issues</i></p>	
<p><i>Strategic flood risk assessment is dated:</i></p> <ul style="list-style-type: none"> The strategic flood risk assessment is based on old data. GBC's Level 2 Strategic Flood Risk Assessment 2016 makes no reference to Tannery Lane at all. It may be that they are relying on wet spots data from Surrey County Council but this is known to be inadequate. 	<p>The Level 1 and 2 Strategic Flood Risk Assessment is based on the most up-to-date information available and is considered to provide a robust piece of evidence.</p> <p>The SFRA only assessed sites for flood risk where they were allocated in the Submission Local Plan and the highest flood risk zone is zone 2. Send Business Centre in Tannery Lane, Send, is a strategic employment site and entirely within flood zone 1. The EA's maps of surface water flood risk do not show the area broadly as being susceptible to surface water flooding. Detailed assessments were carried out in preparing the 2014 Surface Water Management Plan, which indicated incidents of surface water flooding in the area caused by properties in the area being lower than the highway and a lack of highway drainage outside properties. The SWMP identifies the need for £140,000 worth of mitigation measures, to be funded by Surrey County Council as the lead local flood authority for funding purposes. The plan does not allocate Send Business Centre for vulnerable/more vulnerable uses e.g. housing. The 2017 Submission Local Plan allocates Clockbarn Nursery for 60 homes (site A42), however this is appropriate as the site is entirely within flood zone 1 and properties would benefit from the mitigation measures proposed by the SWMP.</p>

Strategic flood risk assessment is dated (continued):

- The GBC Sequential Test does not provide a comparative assessment of all the sites as it uses the best available information in terms of flood risk, for some sites this will be relatively coarse Environment Agency modelling others a strategic model will have been developed. Whereas in other locations, particularly those in the upper catchment no hydraulic modelling will have been undertaken to confirm flood risk. This mismatch of resolution and accuracy of the hydraulic modelling will mean that the extents of the sites shown to be within Flood Zone 3 cannot be equally compared.
- The sequential test does not undertake an assessment of the causes or flow routes, which could indicate the severity of this type of flooding, whether this is local pooling of excess water or high flows/velocities across the site. Furthermore, in many cases of development, surface water flood risk can be largely alleviated through the inclusion of a suitably designed surface water drainage strategy.

The Strategic Flood Risk Assessment (SFRA) is based on the most up-to-date information available from the Environment Agency and is considered to provide a robust piece of evidence. The majority of sites use detailed modelling for the River Wey that shows the 1 in 1,000-year flood risk (0.1% annual exceedance probability). In these cases, the data shows that smaller areas of the sites are at risk than compared to the EA's Flood Maps for Rivers and Seas.

The site allocation policies in the Proposed Submission Local Plan (2017) for sites affected by medium or high risk flood zones require applicants to have regard to the recommendations of the Level 2 SFRA. Policy P4 requires applicants for sites within these zones to demonstrate in a site-specific flood risk assessment that their proposed development will be safe for its lifetime, considering climate change. These requirements, alongside the SFRA's presentation of up-to-date maps for most sites, will ensure that applicants refer to the EA's latest data that shows the impact that climate change will have on the flood zone extents.

Data on flow routes is too detailed for a high-level SFRA. The SFRA has not ruled out any sites based on surface water flood risk, as this can be addressed through drainage strategies (as the respondent mentions) or scheme layout. The Level 2 SFRA includes data on surface water in the stage 3 assessment tables for information only, as sites have been allocated in the Plan on the basis of the extent of fluvial flood risk across them, i.e. flood zones.

Strategic flood risk assessment is dated (continued):

- GBC should update its flood risk sequential test to be based on the latest list of sites contained within the 2017 LAA prior to the GBLP being submitted for examination.

The Level 1: Flood Risk Sequential and Exception Test and Level 2 SFRA documents have both been updated to include the latest information on sites in the Proposed Submission Local Plan (2017) and 2017 LAA.

<p><i>SFRA conformity to NPPF guidance:</i></p> <ul style="list-style-type: none"> To fully conform to NPPF guidance all sources of flooding need to be considered in the Strategic Flood Risk Assessment (SFRA), including surface water and ground water flooding; Evidence presented in relation to the Narrowboat basin application 14/P/02289 John Associates Environmental Statement Vol 8 Water, pages 27-28, reference British Geographical Survey Flood Data by Envirocheck which shows the areas of Send as having high susceptibility; to Groundwater (which includes Tannery Lane). Site A42 Clockbarn Nursery is in the close proximity to the area of Tannery Lane. 	<p>The SFRA considers broad areas of flood risk as well as surface water flooding. The risk of flooding from surface water was determined using the Environment Agency's Risk of Flooding from Surface Water mapping (UFMfSW). This meets the requirements of the Flood Risk Regulations. The respondent is correct in pointing out that this does not consider flooding from ordinary watercourses, sewer systems or groundwater. However, the use of wetspot data produced by Surrey County Council (the LLFA) allowed a more detailed assessment of flood risk, which we have published in our Surface Water Management Plan. In addition, the flood mapping used in the SFRA (the 2009 Lower Wey fluvial model) models the risk of fluvial flooding during a 1 in 1000 year fluvial event, which takes account of climate change.</p>
<p><i>SFRA and sites ruled out:</i></p> <ul style="list-style-type: none"> GBCS used to rule out sites in Sequential test and exception test. Sites would otherwise have passed test. 	<p>It was not considered necessary to test sites in further detail (SFRA stage 2 assessment) that were not considered suitable based on information gleaned from the GBCS.</p>
<p><i>Surface water management plan is dated:</i></p> <ul style="list-style-type: none"> Surface Water Management Plan outdated – carried out before planning permission granted for land to the north of Tannery Lane and east of Wharf Lane. 	<p>The approval of a planning application does not necessitate the updating of the document.</p>
<p><i>Flood Risk Topic Paper:</i></p> <ul style="list-style-type: none"> The Paper cites the sequential testing in NPPF 101. This generates a circular argument in the Local Plan inasmuch as there is insufficient alternative land allocated for development to enable flood plains to be avoided, creating an increased likelihood that there will need to be development in the floodplain, and yet there is no specific flood mitigation plan in the town centre in the absence of any town centre planning within the Local Plan. 	<p>Site-specific flood mitigation on smaller sites with known flood risk is best dealt with at the application stage as it allows developers to finance the cost of masterplanning themselves.</p> <p>The sequential approach to planning for flood risk is an effective and nationally endorsed method of ensuring that flood risk in the borough does not increase as a result of new development, and may be reduced through on-site mitigation measures.</p>

- The Topic Paper does not provide any solutions to flooding, and does not really inform policy in the Local Plan.

There is also a need to address the water catchment increase beyond Waverley and in tributaries such as the Tillingbourne. This, and consequent impact on developable sites, are absent from the Topic Paper and the Plan. We understand that Guildford's flood plan is still in development, and, that it has 16 options including upstream catchment.

As there is so much missing from the plan itself and Topic Paper, we are at a loss to understand if the plan is anywhere close to being sound in terms of flood risk management. This is a shame because there is considerably more detail in the Key Evidence documents that have not been carried forward into this strategic planning document.

It is not necessary to repeat the detailed information within the key evidence documents in the Local Plan or Flood Risk Topic Paper. In areas where historic flooding information and predictive data indicate that the area is at high risk of surface water flooding, Halcrow Ltd carried out detailed flood risk assessments for the 2014 Surface Water Management Plan. The SWMP provides recommendations and an action plan for known surface water flooding hotspots. Ordinary watercourses including smaller streams are the responsibility of local authorities but any plan for reducing flood risk from them lies outside the remit of Local Plan policies. The SFRA recommends further actions to reduce flood risk at identified hotspots across the borough.

Appendix D and Q1: Evidence base – Green Belt

Main Issue	Guildford Borough Council Response
<p><i>Representations on Specific Issues</i></p>	
<p><i>Green Belt and Countryside Study:</i></p> <ul style="list-style-type: none"> Assessment is subjective, flawed, simplistic, and does not assess relative contribution to allow comparison between sites. 	<p>The GBCS is a robust study that goes into sufficient detail to be able to understand the relative contribution that land makes to the purposes of the Green Belt. There are exceptional circumstances that justify amending Green Belt boundaries, which are set out in more detail in the Housing Delivery Topic Paper. The GBCS has been used alongside other evidence base, including the Sustainability Appraisal, to inform the spatial strategy.</p>
<ul style="list-style-type: none"> Green Belt sensitivity of a land parcel should not be used to rule out smaller sites within a land parcel that, if developed would not necessarily compromise the Green Belt purposes of the wider land parcel. 	<p>Whilst PDAs have been identified on the basis that they would not fundamentally harm the main purposes of the Green Belt, there would nevertheless be, in relative terms, more harm caused by allocating sites within land parcels assessed as contributing more towards the purposes of the Green Belt than those judged to be of lesser Green Belt value.</p> <p>In giving greater weight to the sensitivity of the Green Belt, amelioration of the consequent impacts on the Green Belt has been sought as much as is reasonably possible. Justification for the spatial strategy, including the extent to which the sensitivity analysis has been used, is set out in more detail in the Housing Delivery Topic Paper.</p>
<ul style="list-style-type: none"> Bisley Camp should be inset. Detailed evidence provided. 	<p>Pegasus has carried out further work to consider the evidence put forward in relation to this site but conclude that the recommendations in GBCS Volume V remain robust and the site should remain washed over. This is included as an appendix to the Green Belt and Countryside Topic Paper.</p>

- Merrist Wood should be inset. Detailed evidence provided.

Pegasus has carried out further work to consider the evidence put forward in relation to this site but conclude that the recommendations in GBCS Volume V remain robust and the site should remain washed over. This is included as an appendix to the Green Belt and Countryside Topic Paper.

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Appendix D and Q1: Evidence base – housing

Main Issue	Guildford Borough Council Response
<p>Representations on Specific Issues</p>	
<p><i>OAN too high:</i></p> <ul style="list-style-type: none"> • Lack of transparency, model is not available. <p>Figures have not been scrutinised.</p> <p>Independent reviews of the SHMA prepared by NMSS and David Reeve which challenge assumptions and methodology used:</p> <ul style="list-style-type: none"> • migration assumptions, • un-attributable Population Change, • implications of Brexit, • household formation rates, • empty and second homes, • implications of new 2014 population projections, • uplift for market signals and affordable housing, • uplift for student housing, and • uplift for economic growth. 	<p>The SHMA has been prepared in accordance with the NPPF and NPPG. This states that the ONS population and CLG household projections form the starting point and based on nationally consistent assumptions. These figures and the assumptions underlying them are all publicly available.</p> <p>The SHMA has examined demographics in the Borough and wider HMA, including migration, UPC and household formation.</p> <p>The methodology detailing how the uplifts have been calculated are set out in the SHMA with data clearly sourced.</p> <p>The Council’s OAN consultants have considered issues raised by representors in the development of the evidence base.</p> <p>The SHMA has undergone significant scrutiny from early on its preparation. This included a review by Edge Analytics, commissioned by GBC. The Council has reviewed the evidence submitted and consider that our evidence remains robust.</p>

<p><i>The OAN should be reduced further still:</i></p> <ul style="list-style-type: none"> Independent review by NMSS challenging assumptions on: <ul style="list-style-type: none"> large population of students, net migration, uplift for student growth, uplift for market signals and affordable housing, homes forecast to meet jobs growth. <p>Brexit and reduced net migration,</p> <p>Longer term population trends,</p> <p>Underestimate of students who migrate out of Guildford,</p> <p>UPC adjustment which indicates an overestimation of population growth,</p> <p>Should not include demand from London or Woking, and</p> <p>OAN is assessed to be higher than population projections.</p>	<p>The SHMA has been prepared in accordance with the NPPG. This states that the ONS population and CLG household projections form the starting point. These figures and the assumptions underlying them are all publicly available. The SHMA has examined demographic dynamics in the Borough.</p> <p>The methodology detailing how the uplifts have been calculated are set out in the SHMA with data clearly sourced.</p> <p>The SHMA has undergone significant scrutiny from early on its preparation. This included a review by Edge Analytics, commissioned by GBC. The Council has reviewed the representations submitted, which include representations arguing for both higher and lower OAN figures and consider that our evidence remains robust and the OAN is appropriate to the housing need in Guildford.</p>
<p><i>The OAN reduction is not justified:</i></p> <ul style="list-style-type: none"> An independent review by Lichfields. <p>Previous shortfall in housing delivery.</p> <p>Evidence on market signals.</p> <p>Evidence of affordable housing need which has increased.</p> <p>Insufficient adjustment for London migration.</p> <p>Uncertainties regarding Brexit.</p> <p>The PPG indicates that adjustments to household formation</p>	<p>The SHMA has been prepared in accordance with the NPPG. It deals with housing need over the plan period. This states that the ONS population and CLG household projections form the starting point. The Addendum evidence takes account of the latest Mid-Year Population Estimates. The latest household projections point to lower growth across the Housing Market Area.</p> <p>Market signals, which includes historical housing delivery, have been considered in drawing conclusions on the OAN as has the inter-relationship between Guildford and London. Brexit uncertainties do not provide a clear basis for adjusting the OAN, but inevitably this will need to be kept under review. The uplifts included within the evidence are appropriate to Guildford.</p>

<p>rates and for market signals are separate stages in the calculation (headship rates in ID 2a-015 and market signals in ID 2a- 02o). Modelling household formation as a precise response for market signals doesn't seek to consider what impact it has on improving affordability. Market signals/affordability affects other age groups, and the PPG is clear that the purpose of a market signals uplift is to provide more than the household projections. This matter was explored in the Waverley examination.</p> <p>Failure to assess whether lower job growth in Guildford might be balanced by increased job growth elsewhere in the HMA.</p> <p>Unjustified decrease in employment forecasts.</p> <p>2014 population projections point to higher growth than previous projections.</p> <p>Latest mid-year population estimates indicate a higher growth than that contained in projections.</p> <p>Projections show greatest increase in short term whilst the plan backloads delivery.</p>	<p>These figures and the assumptions underlying the OAN evidence are all publicly available. The methodology detailing how the uplifts have been calculated are set out in the SHMA with data clearly sourced.</p> <p>The latest economic forecasts show lower employment growth across the Housing Market Area.</p> <p>The SHMA has undergone significant scrutiny from early on its preparation. This included a review by Edge Analytics, commissioned by GBC. The Council has reviewed the evidence submitted and consider that our evidence remains robust.</p>
<ul style="list-style-type: none"> • The SHMA is not consistent across/does not cover the entire HMA. 	<p>Paragraph 2a-007 in the PPG outlines that where local plans are at different stages of production, LPAs can build on the evidence of partner authorities in the HMA but should coordinate future reviews. GL Hearn has prepared a report which draws together the latest evidence on housing need (OAN) across the three HMA authorities.</p>

<p><i>Smaller properties and homes for older people:</i></p> <ul style="list-style-type: none"> • There is a chronic shortage of social housing and of one or two bed roomed properties for sale or rent in the borough. Moreover, there is a need for homes, particularly bungalows, for elderly people wanting to downsize and stay in the area. There appears to be nothing in the Plan to address these issues, except the aspiration for 40% affordable homes in the larger developments. <p>With the current level of house prices in the borough, it is doubtful that many would-be buyers would be able to afford an 'affordable' property or an 'affordable' rent. Also, developers are renowned for using their 'get-out card' to avoid building 'affordable' homes. There appears to be a serious mismatch between the housing need and where and how it could be met. Rather, the Plan simply gives a green light to developers to build all over the Green Belt and to plan for future 'easy' growth.</p> <p>No provision has been made for specialist retirement or care development accommodation in the Ash and Tongham area, despite the fact that 1,320 units are proposed in this location.</p>	<p>Policy H1 Homes For All seeks to meet a range of accommodation needs and reflect the latest SHMA, which currently shows a need for more 1,2 and 3 bedroom homes. The Policy also seeks accessible, adaptable and wheelchair friendly homes on developments of over 25 homes which will help people seeking specific accommodation. The reasoned justification gives guidance on housing for older people in our community, including smaller homes suitable for downsizing.</p> <p>Affordable housing is addressed in detail in policy H2. The Housing type, tenure and mix Topic Paper also gives further information.</p> <p>Some of the larger strategic development sites will provide either C2 care or nursing homes or extra care housing.</p>
<p><i>University Student Housing:</i></p> <ul style="list-style-type: none"> • The University has approximately 14,000 FTE students, half of whom live off-campus. This means that around 7,000 students live in the town centre, occupying homes that could be made available for University staff and other key workers. A policy to ensure that the University accommodates 80-90 per cent of its students on its existing campuses would greatly help the housing situation as it would quickly free up 1,000 - 2,000 lower-cost houses close to the Hospital, Research Park and University. 	<p>The wording of Policy H1 has been significantly reviewed.</p> <p>Our expectation that the University of Surrey will meet 60% of its students accommodation needs is considered reasonable. It originates from the last 2003 Local Plan, where the Inspector stated (para 16.2.4) that Manor Park site was removed from the Green Belt as there will be a need to increase student residential accommodation, with the aim of returning the proportion resident to about 60%. The University has by far the greatest number of students requiring accommodation and bearing in mind the extant planning permissions at Manor Park campus and historical precedent, this approach is</p>

Dedicated student accommodation would provide a range of other benefits to students and to Guildford: Better for students:

- It is more affordable for students
- Dedicated accommodation would be more appropriate
- Living on campus would be safer for students.
- Students would have the benefit of a guaranteed residence throughout their studies.
- Students can still enjoy the benefits of town life.
- Students perform better
- There would be fewer traffic movements, and fewer problems with students parking in residential areas.

If there were a dramatic swing in student numbers in the future, voids in student residences could be passed back to offer homes for local people, such as nurses.

There will be improvements in neighbourhoods vacated by students when the houses provide accommodation for families and key workers throughout the year. Businesses in Guildford Park Avenue have struggled and some have closed down because local houses are occupied for just 30 weeks of the year. It would also help to tackle issues “with noise and disturbance, car parking and sometimes with the general upkeep of the rented property”

Under a 2004 Section 106 agreement (Section 15), Hazel Farm will be released by the University to provide housing for Guildford once 2,500 units have been built on Manor Park. Whilst the site cannot be used for family housing (because of its proximity to Whitmore Common SPA), Natural England would allow the site to be used as a care home. The usage would seem appropriate given the ageing population often cited as being a reason for population growth, and it would help towards Guildford’s housing supply numbers.

considered reasonable.

The approach has been included within the policy to make clear the expectations about student accommodation. The expectations are that 60% of all University of Surrey students, not just future student growth, should be accommodated on campus; this reflects the historical approach taken as set out above. It should also be recognised that students have the freedom to choose where they live.

The Section 106 agreement relating to Hazel Farm is a matter for colleagues in Development Management.

The Submission Local Plan proposes further purpose-built student accommodation at the University of Law (112 bedspaces) and Guildford College (200 bedspaces). There is a pending application at Guildford College for 527 student bedspaces within a purpose built block. Student accommodation need has been reviewed and updated in the SHMA addendum 2017.

The University has extant outline planning permission for student accommodation on the Manor Park campus and it continues to build this student accommodation.

Students have a free choice over where they choose to live.

There are precedents for having nearly all students live on campus.

The University has ample space on its Manor Park and Stag Hill campuses to provide this accommodation.

There would be *no cost* to the University.

Some numbers in detail:

According to the University website, it provides the following number of beds:

Stag Hill: 3,002, Hazel Farm: 349, Manor Park: 1665, Total: 5,016

From the 2011/12 Financial Review, there are the following students:

Undergraduates: 10,878, Postgraduates: 3,157, Research: 1,174. Total: 15,209 (NB this includes some part-time, so the Full Time Equivalent (FTE) number is 13,576).

Student preference is an argument that the University has used in order not to build its student housing.

1) The majority of students attending Oxford University are not given the option to live in shared accommodation in town, and this does not prevent them wanting to go there.

2) Many students actively want to live on campus and want the security of knowing that they have a roof over their heads for three years. The student halls are filled every year. A number of students, for example in Onslow Village, would have preferred to remain on campus, but say they were unable to do so.

3) In 2002, when the University was pushing to take Manor Farm out of green belt, it argued that students wanted to live in student halls and that not having enough on-campus accommodation meant that it was losing students to Kingston. It also stated the following:

“The provision of on-campus accommodation for over 60% of students is a benefit of very substantial significance. On-campus accommodation is cheaper than renting in the private sector and students are closer to the University’s facilities. Other benefits include a subsequent reduction in housing demand in Guildford, further enhanced by the release of University land at Hazel Farm for general housing provision.” - University of Surrey, Manor Park Non-Technical Summary (para 19/20), November 2002. The University now promotes the opposite argument suggesting that students prefer to live in town. Pressure for housing in the town suits the University's case to develop its land holding on the green belt.

4) GRA is not being suggested students currently attending University of Surrey should be forced onto campus. This policy would only affect future students, ie those currently studying for their GCSEs. Future candidates would be applying to Guildford in the knowledge that this was a "campus university" in the true sense of the word.

5) It would be possible for the University to encourage students to live on campus by making the accommodation cheaper or by including accommodation costs within the student fees. Exceptions could be made for students who were married with families or who wished to live with their parents or who had other good reason for living in town.

Students:

- The way students, economic need and affordability are calculated inflates the housing need. Students should be housed on campus – would release homes. Student need should be calculated separately. Student need should not be added to housing need. Students only have need for 8 months a year and no intention of living in villages.

The student population has a highly significant impact on occupancy and the local market and should be dealt with separately for projection purposes.

The use of numbers of foreign students has been used to add to housing needs and therefore inflates the number of houses needed. If the population is to grow by the amount predicted then only approximately 8,000 homes will be needed and not 13,860.

International student figures have been used to influence the amount of housing needed even though once their courses are complete they will spread out or return to their respective countries.

Transient population of higher education students

The housing numbers have been exaggerated by including students in the population increase to amplify the number of new houses required.

The number of foreign students has been wrongly used to inflate the need. The required 13,860 houses in the local plan is exaggerated. If the population is to grow by some 20,000 in the plan we actually need 8,000 homes (based on an average of 2.5 persons per home).

The SHMA and SHMA addendum looks at the issue of student housing in detail and provides figures taking into account students living on campus and living within market housing in the community. For students living within market housing, it is calculated to be 23 homes per year over the plan period. Student migration has been carefully assessed within the SHMA and Addendum and they conclude that demographic projections do not show additional in-migration in student age groups, but increasing the student population would result in additional housing need over and above the demographic projections (page 70, paragraph 8.19).

The University of Surrey does have extant planning permission for student accommodation on the Manor Park Campus. It continues to build-out the detailed planning permissions for student accommodation.

The Submission Local Plan proposes further purpose built student accommodation at the University of Law (112 bedspaces) and Guildford College (200 bedspaces). There is a pending application at Guildford College for 527 student bedspaces within a purpose built block.

<p>Consider student movement separately other groups.</p> <p>The plan is distorted by large student numbers from Guildford University, which disproportionately increases the 'required' number of houses. the University must provide campus housing for the students, not destroy greenbelt land by trying to accommodate students off campus. The SHMA is not justified and should be reviewed.</p>	
<p><i>Traveller Accommodation Assessment (TAA):</i></p> <ul style="list-style-type: none"> It is clear from the Local Plan that you have used a June 2012 Traveller Accommodation Assessment policy as evidence for the June 2016 Proposed Submission Local Plan and the 2016 Land Availability Assessment. As the government published a new policy for traveller sites in August 2015, the Borough's June 2012 assessment must therefore be considered out-of-date. 	<p>A new Traveller Accommodation Assessment was published June 2017.</p>
<p><i>Land Availability Assessment:</i></p> <ul style="list-style-type: none"> The LAA should not discount sites purely on the basis that they are not identified in the Green Belt and Countryside Study. The NPPG states that <i>'When carrying out a desk top review, plan makers should be proactive in identifying as wide a range as possible of sites and broad locations for development (including those existing sites that could be improved, intensified or changed). Sites, which have particular policy constraints, should be included in the assessment for the sake of comprehensiveness but these constraints must be set out clearly, including where they severely restrict development. An important part of the desktop review, however, is to test again the appropriateness of other previously defined constraints, rather than simply to accept them. Plan makers should not simply rely on sites that they have been informed about but actively identify sites through the desktop review process that may have a part to play in meeting the development needs of an area.'</i> 	<p>The Green Belt and Countryside Study identified a range of sites (potential development areas) which would not significantly harm the purposes of the Green Belt different site options that could be utilised depending upon the Council's chosen spatial strategy. This has been informed through the Sustainability Appraisal process and other evidence. The proposed site allocations form a sub-set of these sites.</p> <p>For the reasons set out in the Housing delivery Topic Paper, there are exceptional circumstances to justify amending Green Belt boundaries for the site allocations. Developing sites that have not been identified with the GBCS would significantly compromise the purposes of the Green Belt and are not considered appropriate or reasonable options for development.</p>

Appendix D and Q1: Evidence base - infrastructure

Main Issue	Guildford Borough Council Response
<p>Representations on Specific Issues</p>	
<p><i>IDP: Inadequate infrastructure planning:</i></p> <ul style="list-style-type: none"> • There are concerns related to the evidence base to support appropriate planning including a lack of: <ul style="list-style-type: none"> • evidence of large scale infrastructure required to support growth, • an Infrastructure Report as a part of the Guildford Local Plan consultation, • account taken of schools, roads or doctor's surgeries which are already overwhelmed/ infrastructure already at capacity, and • detailed and deliverable infrastructure proposals to support the proposed local developments. (evidenced by Thames Waters' lack of capacity to absorb housing developments proposed for West and East Horsley). 	<p>An Infrastructure Baseline (2013) was compiled which fed into the compilation of the Infrastructure Delivery Plan and Infrastructure Schedule.</p> <p>See responses to ID1 in relation to this issue.</p>
<p><i>IDP: Inadequate funding provision for infrastructure:</i></p> <ul style="list-style-type: none"> • There is a deficiency in the evidence base to demonstrate detail and proper costing of infrastructure. • There is reliance on funding not yet allocated by central government. 	<p>See responses to ID1 in relation to this issue.</p>

<p><i>Local Plan and CIL Viability Study:</i></p> <ul style="list-style-type: none"> • Question the robustness of the Viability and Affordable Housing Study, Peter Brett Associates, December 2014, which was prepared in the context of a Draft affordable housing policy, which had already been set, has now been amended, and utilises the preliminary CIL figures. • Concerned that the 40% target for affordable housing provision has been determined on the basis of assumptions from the Preliminary Draft of the CIL Charging Schedule, 2015. Furthermore, the affordable housing threshold does not take account of National Guidance. 	<p>The Local Plan and CIL Viability Study (2016) updated and replaced the 2014 Study. The viability analysis contained within the report tests incorporate fully compliant affordable housing scenarios and makes recommendations of an appropriate level of CIL based on meeting the affordable housing requirements set out in the Submission Local Plan so as not to put at risk delivery of development and associated infrastructure requirements.</p>
<p><i>Infrastructure Baseline / IDP – Health and social care:</i></p> <ul style="list-style-type: none"> • Page 63 - one GP surgery is indicated on the borough boundary with Waverley – GP Surgery 10, which is referenced as New Inn Surgery. This is incorrect and we believe that what should be shown is the Binscombe Medical Practice. The list does not include the Binscombe Medical Centre, which is out of Borough but serves some of the population. 	<p>Binscombe Medical Centre is correctly indicated (annotated as no. 19) and located in Waverley Borough Council in the Infrastructure Development Plan (2016).</p>

Appendix D and Q1: Evidence base – open space, sport etc.

Main Issues	Guildford Borough Council Response
<p><i>Representations from Prescribed Bodies and Selected Stakeholders</i></p>	
<p>Sport England</p> <ul style="list-style-type: none"> Maintain objection to the proposed Local Plan submission primarily on the grounds that it is not based on a sufficiently robust and up to date assessment of sport and recreation needs in the form of a PPS and indoor built facilities strategy developed in accordance with Sport England’s guidance. 	<p>This issue is addressed in the responses to Policy ID4.</p>

Appendix D and Q1: Evidence base – Sustainability Appraisal and Habitats Regulations Assessment

Main Issue	Guildford Borough Council Response
<i>Sustainability Appraisal</i>	
<i>Representations on Specific Issues</i>	
<ul style="list-style-type: none"> Garlick’s Ash should have been a variable across the alternatives, given its late appearance. This is a fair point, worth considering further. 	<p>The reasons for treating this site as a ‘constant’, rather than as a ‘variable’ are explained at paragraph 6.6.14 of the SA Report Update (2017), with some supplementary information presented within Box 6.10. The aim is to explain that, despite comprising amber-rated Green Belt and being subject to some constraints (see Appendix IV of the report), development would support delivery of A3 junction upgrades, and would deliver a Travelling Showpeople site in an appropriate location.</p>
<ul style="list-style-type: none"> The 2014 Draft Plan supported a relatively high growth strategy around villages. In contrast, this option was ruled-out as ‘unreasonable’ in 2016 when developing reasonable alternatives, with “no justification provided as to why development opportunities around Fairford [sic] and Wood Street village were not taken forward for allocation above sites such as Normandy except solely on public perception as noted at page 29 of the Appraisal, when the allocations are subject to the same Green Belt considerations and in fact rank lower in the settlement hierarchy”. 	<p>Chapter 6 of both the SA Report (2016) and SA Report Update (2017) deals with “Developing the reasonable alternatives”. In both instances, the chapter is divided into two sub-sections: firstly, there is a discussion of the ‘context and background’; and then secondly a discussion of the ‘stepwise process’ undertaken to arrive at reasonable alternatives, in light of the ‘context and background’.</p> <p>The situation in respect of reasonable village growth options is explained at paras 6.6.13 to 6.6.17 of the SA Report Update (2017), with supplementary information presented within Box 6.10. Village Green Belt sites are essentially placed into three tiers of suitability. The sites in question (around Fairlands, in Worplesdon Ward) are discussed under ‘D’ within Footnote 36, where it is explained: “Three sites at Worplesdon Ward are in relatively close proximity to Guildford, but development would create traffic issues in the early part of the plan period, as per Liddington Hall.</p>

<ul style="list-style-type: none"> Suggests that: “The Sustainability Appraisal inappropriately fails to test the full range of alternative school strategies”. 	<p>When seeking to establish reasonable alternatives, in both 2016 and 2017, the aim was to develop reasonable alternative approaches to housing growth, or ‘spatial strategy alternatives’. The aim was not to develop alternative school strategies.</p> <p>The representor is particularly concerned by the decision not to feature a strategic scale scheme at Effingham, to include a new secondary school, within the reasonable alternatives. This site is discussed under ‘C’ within Footnote 36, where it is explained: “<i>One site in Effingham Ward would involve a large scheme delivering a relocated secondary school; however, relocation is not necessary and the site comprises red-rated Green Belt.</i>”</p>
<ul style="list-style-type: none"> The representation highlights a factual error within Appendix IV of the SA Report, which deals with the appraisal of 'site options' in isolation (linking to Chapter 6 "Establishing the reasonable alternatives"). <p>Also in relation to Appendix IV, the representation suggests that the site should be assessed as brownfield, noting that pre-application discussions have taken place.</p> <p>The representation suggests that, were these two issues to be addressed, then the site option would be shown to be ‘a highly sustainable location’.</p>	<p>The factual error, which relates to the distance between a site option and a primary school, will be corrected as part of any future SA work.</p> <p>The Council’s view was that the site is primarily greenfield. It could be that further investigation is required, noting that pre-application discussions have taken place.</p> <p>It is not the role of the SA to conclude on whether or not any given site option is sustainable. Further to this, it is important to note that GIS appraisal of site options (Appendix IV of the 2017 report) was an initial step undertaken in order to inform the selection of reasonable alternatives. It had only a very indirect influence on site selection.</p>
<ul style="list-style-type: none"> In the context of the current preferred spatial strategy, the respondent is “<i>concerned that in a previous iteration of the plan the sustainability appraisal supported a significantly more positive approach with the Council considering itself able to deliver 14% above its then significantly higher housing requirement.</i>” 	<p>In fact, neither the SA Report (2016) nor the SA Report Update (2017) ‘supported’ any particular approach to housing growth. Rather, both reports appraised the preferred approach and alternatives, highlighting the pros and cons of the various options.</p> <p>The Council does believe that the SA Report serves to ‘justify’ the preferred approach, but only on balance. Chapter 8 of the SA Report Update (2017) explains the Council’s reasons for supporting the preferred approach, on balance, in light of the appraisal of reasonable alternatives presented in Chapter 7.</p>

<ul style="list-style-type: none"> The representation is generally supporting of the SA process, and seeks only some clarifications that do not “go to the heart of the SA, and are made purely as clarifications.” <p>Most notably, the representation queries the Green Belt sensitivity rating that should be applied to the site, suggesting that the correct rating is ‘low to medium’ sensitivity.</p>	<p>The clarifications can be addressed as part of any future SA work.</p> <p>The appraisal was undertaken on the understanding that the site has a ‘medium’ (or ‘amber’) sensitivity (see para 10.11.4 of the SA Report Update, 2017), as evidenced by the Green Belt and Countryside Study.</p>
<ul style="list-style-type: none"> The representation suggests that analysis presented within the SA Report serves to demonstrate that the Council has ‘ignored’ the matter of unmet housing needs arising from Woking. <p>The representation also suggests that the SA conclusions in respect of Option 8 (OAHN plus 27%) are unduly harsh, as the effects could be mitigated.</p> <p>The representation goes on to suggest that the alternatives appraisal presented within Chapter 7 of the SA Report Update (2017) serves to demonstrate that Option 8 is ‘best’.</p> <p>Finally, the representation quotes from paragraph 6.5.26 of the SA Report, as part of an argument to suggest that the SA is supportive of a high growth option (and specifically an option that would involve providing for Woking’s unmet needs).</p>	<p>GBC disagree with this assertion. Chapter 7 of the SA Report Update (2017) presents an appraisal of eight reasonable alternatives, with Option 8 involving provision for ‘OAHN plus 27%’. This would mean in practice making provision for a proportion of Woking’s unmet needs. This point is explained on pg. 47, and in detail on pg. 136. The Council took account of the alternatives appraisal when developing the preferred approach (as explained in Chapter 8). As such, the Council has demonstrably not ignored unmet needs arising from Woking.</p> <p>This suggestion is not evidenced, and hence is not accepted. The suggestion is also made seemingly without any recognition of the ‘mitigation hierarchy’, i.e. the need to avoid effects ahead of relying on mitigation, where possible (NPPF para 152).</p> <p>The Council would disagree. Rather, the Council is of the view that the alternatives appraisal serves to justify a conclusion that Option 1 represents sustainable development, on balance (i.e. Option 1 is ‘best’). The Council’s reasoning is presented in Chapter 8.</p> <p>The quote is presented out of context, and hence is presented in an unhelpful manner. Para 6.5.26 relates to a discussion regarding whether Option 8 is a reasonable option for appraisal. It does not relate to a discussion of how Option 8 performs relative to other reasonable options.</p>

- The representation suggests that the spectrum of alternatives appraised (Chapter 7 of the SA Report Update) is deficient.

The representation also seeks to critique the appraisal itself (Chapters 7 and 10), suggesting that consideration has not been given to 'environmental limits' and also suggesting that insufficient consideration has been given to long term effects.

The Council disagrees with this comment. Eight alternatives were appraised, and the reasons for selecting these alternatives is presented in detail (over-and-above the requirement to present 'an outline of the reasons for selecting the alternatives dealt with') in Chapter 6 of the report.

The Council disagree with these suggestions:

- Where limits, or thresholds, are known, and cause-effect relationship between the plan (or a plan alternative) can be established, then a 'significant effect' is recorded through appraisal. For example, all of the alternatives appraised within Chapter 7 are predicted to result in a significant negative effect in respect of 'Biodiversity', and all except Option 1 are predicted to result in a significant negative effect in respect of 'Landscape'.
- With regards to long term effects, it is naturally the case that such effects were a consideration when completing appraisal work, recognising the reference to such effects within the SEA Directive / Regulations. For example, it might be said that a precautionary approach is taken within the report to dealing with flood risk, recognising the inherent uncertainties associated with future flood risk under a climate change scenario. The specific long-term effect referenced by the representation (that a draw-back of higher housing growth options is that there will be less land available in the future to meet the housing needs of future generations) is questionable, and it is far from clear that it necessitates discussion through SA.

<ul style="list-style-type: none"> The representation suggests that the alternatives appraised (Chapter 7 of the SA Report Update) do not represent the 'reasonable alternatives'. 	<p>The Council disagree with this comment. Eight alternatives were appraised, and the reasons for selecting these alternatives is presented in detail (over-and-above the requirement to present 'an outline of the reasons for selecting the alternatives dealt with') in Chapter 6 of the report.</p>
<ul style="list-style-type: none"> The representation highlights a factual error within Appendix IV of the SA Report, which deals with the appraisal of 'site options' in isolation (linking to Chapter 6 "Establishing the reasonable alternatives"). Specifically, the error relates to the distance between a site option and a secondary school. <p>The representation is critical of the methodological step of utilising 'as the crow flies' distances, as part of the analysis of site options presented in Appendix IV.</p>	<p>1) This factual error will be corrected as part of any future SA work. 2) The use of 'as the crow flies' distances was a necessary methodological approach, recognising the large number of site options subjected to appraisal.</p> <p>It is important to note that GIS appraisal of site options (Appendix IV of the 2017 report) was an initial step undertaken in order to inform the selection of reasonable alternatives. It had only a very indirect influence on site selection.</p>
<ul style="list-style-type: none"> The representation suggests that the alternatives appraised (Chapter 7 of the SA Report Update) do not represent the 'reasonable alternatives'. <p>The representation suggestions that the appraisal of reasonable alternatives (Chapter 7) 'assumes a generally increasing level of impacts pro-rata to the level of development proposed'.</p> <p>The representation suggests that the appraisal of reasonable alternatives (Chapter 7) fails to properly reflect the beneficial effects of locating development close to the urban area.</p>	<p>The Council disagree with this suggestion. Eight alternatives were appraised, with the reasons for selecting these alternatives presented in detail (over-and-above the requirement to present 'an outline of the reasons for selecting the alternatives dealt with') in Chapter 6 of the report.</p> <p>The second point raised is not correct.</p> <p>The Council do not agree with the final suggestion. For example, Option 4 is judged to perform best in terms of 'Communities' objectives for the very reason that it would involve high growth at Guildford Urban Area, and thereby support targeted infrastructure enhancements.</p>

Habitat Regulations Assessment	
Representations from Prescribed Bodies and Selected Stakeholders	
<p>RSPB</p> <ul style="list-style-type: none"> In relation to our concerns about the rejected Wisley Airfield scheme, we do not consider it likely that a project level assessment will be able to adequately exclude the risk of harm to the Special Protection Area, as we do not believe a SANG at this development site can be effective in drawing residents away from the SPA as a result of the Public rights of way network on the site. As this information is already known and was available to the authors of the HRA we consider it inappropriate to rely upon such an approach here – the issues of concern are ones which are not capable of being resolved at the application level. Part of the role of the HRA of the Plan should be to evaluate the likelihood that a project-level assessment can be passed – helping to give a clear understanding of the likely deliverability of key sites: the former Wisley airfield is expected to deliver 16.1% of the Borough's overall housing until 2034 – so it is essential that any risks to such a site coming forward should be clearly evaluated. 	<p>A project level HRA associated with the planning application has already concluded that the detailed SANG proposals for Wisley that were contained in their application would avoid an adverse effect on the SPA, provided they were secured in perpetuity and appropriately managed and Natural England concurred with that conclusion. Therefore it is evident that a project level assessment is able to exclude risk of harm.</p>
<ul style="list-style-type: none"> In paragraphs 3.3.6 and 3.3.7 the authors make negative assertions regarding the validity of scientific studies of disturbance and predation without presenting contrasting evidence. Under these circumstances, such assertions are merely hearsay and can make no contribution to the veracity of the scientific evidence. I propose paragraphs 3.3.6 and 3.3.7 are, either withdrawn from the document, or their assertions ignored. 	<p>The comments made in paragraphs 3.3.6 and 3.3.7 are not negative assertions about the validity of any of the studies mentioned. They do not comment on the validity of the studies at all. These paragraphs simply make two general comments that a) behavioural responses may not always reflect the population consequences of human disturbance (which is well known in the scientific community and for which a scientific reference is cited) and b) recreational use of a wildlife site is not inherently negative.</p>

Representations on Specific Issues	
<ul style="list-style-type: none"> Habitat Regulations Assessment and Sustainability Appraisal were released after the plan was approved by the full council on 25 April 2016. <p>When the consultation process for the first draft of the local plan began GBC did not have a Sustainability Assessment. The HRA was not completed until AFTER the draft local plan was sent out to consultation. The consideration given to A35 in the HRA is perfunctory. It merely 'parks' the issues.</p>	<p>The Habitat Regulations and Sustainability Appraisal processes were undertaken concurrently with the development of the Proposed Submission Local Plan Strategy and Sites in order to ensure that they were embedded into decision making, in line with best practice. Due to the deadlines involved, the HRA and SA documents were not finalised at the time the plan was approved by full council. However, officers were aware that the emerging assessments did not present any showstoppers that would stop the plan progressing. Therefore, it is considered that it was not inappropriate for full council to progress the plan without the final versions of the two documents. The Habitat Regulations Assessment and Sustainability Appraisal were in draft and appended to the Full Council committee reports.</p> <p>The plan was consulted upon under The Town and Country Planning (Local Planning) (England) Regulations 2012. The regulations state that the plan must be accompanied at examination by the proposed submission documents, which include the SA and HRA. There is no requirement for these to be available prior to consultation on the Local Plan.</p> <p>The requirement to consult on the SA for a statutory timeframe of six weeks was met. There is no legal requirement to publically consult on the HRA at all.</p> <p>Discussion of A35 (Wisley Airfield) in the HRA (specifically the entry in Chapter 5) discusses all the key impact pathways, including reference to the fact that no new residential development will be delivered within 400m of the SAC, reference to the SANG design and layout and the detailed transport and air quality calculations undertaken for the project. With regard to when detailed assessment is appropriate, There is ample case law to support the tiering of assessment in this manner, with more detailed investigation undertaken at each subsequent stage:</p>

- The Court of Appeal¹ has ruled that provided the competent authority is duly satisfied that mitigation could be achieved in practice this will suffice to enable a conclusion that the proposed development would have no adverse effect.
- The High Court² has ruled that for '*a multistage process, so long as there is sufficient information at any particular stage to enable the authority to be satisfied that the proposed mitigation can be achieved in practice it is not necessary for all matters concerning mitigation to be fully resolved before a decision maker is able to conclude that a development will satisfy the requirements of the Habitats Regulations*'.
- Advocate-General Kokott³ has commented that '*It would ... hardly be proper to require a greater level of detail in preceding plans or the abolition of multi-stage planning and approval procedures so that the assessment of implications can be concentrated on one point in the procedure. Rather, adverse effects on areas of conservation must be assessed at every relevant stage of the procedure to the extent possible on the basis of the precision of the plan. This assessment is to be updated with increasing specificity in subsequent stages of the procedure*'.

In each case the HRA report identifies whether it considers that, based on experience of similar projects in similar locations, those project-level assessments are likely to be able to conclude that no adverse effects will arise. For example, '*With appropriate design and timing of works it is considered probable that this site can be delivered for its intended purpose*'.

¹ No Adastral New Town Ltd (NANT) v Suffolk Coastal District Council Court of Appeal, 17th February 2015

² High Court case of R (Devon Wildlife Trust) v Teignbridge District Council, 28 July 2015

³ Opinion of Advocate General Kokott, 9th June 2005, Case C-6/04. Commission of the European Communities v United Kingdom of Great Britain and Northern Ireland , paragraph 49.
<http://curia.europa.eu/juris/document/document.jsf?docid=58359&doclang=EN>

<ul style="list-style-type: none"> The HRA pre-determines whether Natural England will act to approve both strategic and "bespoke" SANG submitted for planning approval. 	<p>Natural England has not raised any objection to the Local Plan or its HRA.</p>
<ul style="list-style-type: none"> There is a disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels. 	<p>On the contrary, the air quality assessment reported in Section 10.4 of the HRA report is explicitly 'in combination' in that the Do Something scenario presented in this section and in Appendix D models 2033 NOx concentrations and nitrogen deposition rates taking into account growth in Guildford Borough and also growth in housing, employment, jobs and population in all other authorities over the same period (via the government's Trip End Model Presentation Programme). Once expected improvements in vehicle emission factors and background nitrogen deposition rates over the same time period are taken into consideration (in line with government guidelines) nitrogen deposition rates in 2033 are expected to be lower than nitrogen deposition rates in the base case, notwithstanding increases in traffic on some of the modelled links.</p>
<ul style="list-style-type: none"> The HRA demonstrates that Policy S2, H3, P2, P3, E1, E2, E4-9, I3 (13 out of 27 Policies) have an impact on TBHSPA but this is not referred to in the conclusion <p>The HRA demonstrates that the majority of sites in 400m-5km mitigation zone need special HRA evaluations to be carried out (63 out of 82 sites in total) but this is not referred to in the conclusion/the HRA does not cover project level HRA for these sites.</p> <p>The HRA should include detailed assessments of these sites.</p> <p>Various proposals for employment sites, district centres, local centres and site allocations require special level HRA</p>	<p>The conclusion is not intended to summarise the entire assessment but to draw out the actual conclusions of that assessment i.e. whether the plan will, or will not, have an adverse effect on European sites. Also, this impact assessment is prior to consideration of mitigation measures and similar such as the Thames Basin Heaths Avoidance Strategy.</p> <p>The conclusion is not intended to summarise the entire assessment but to draw out the actual conclusions of that assessment i.e. whether the plan will, or will not, have an adverse effect on European sites. The 'special' HRA evaluations mentioned do not need to be lengthy or arduous given the presence of the agreed Thames Basin Heaths Avoidance Strategy but are necessary to confirm compliance with that strategy.</p> <p>With regard to when detailed assessment is appropriate, for the Local Plan HRA it is only necessary to determine if the site (e.g. A35) is deliverable in principle, not to evaluate all the details of the bespoke</p>

	<p>masterplan and SANG layout as that is the role of the lower tiers in the process. Given that SANG proposals were devised for the planning application and both the Council and Natural England deemed them suitable, there is no reason to believe that the site is not deliverable in principle. It is not the place of the strategic HRA to evaluate the detailed design of any SANG, as that would effectively require a detailed design to exist before a site could even be allocated, which is not logical. There is ample case law to support the tiering of assessment in this manner, with more detailed investigation undertaken at each subsequent stage:</p> <ul style="list-style-type: none">• The Court of Appeal⁴ has ruled that provided the competent authority is duly satisfied that mitigation could be achieved in practice this will suffice to enable a conclusion that the proposed development would have no adverse effect.• The High Court⁵ has ruled that for '<i>a multistage process, so long as there is sufficient information at any particular stage to enable the authority to be satisfied that the proposed mitigation can be achieved in practice it is not necessary for all matters concerning mitigation to be fully resolved before a decision maker is able to conclude that a development will satisfy the requirements of the Habitats Regulations</i>'.• Advocate-General Kokott⁶ has commented that '<i>It would ... hardly be proper to require a greater level of detail in preceding plans or the abolition of multi-stage planning and approval procedures so that the assessment of implications can be concentrated on one point in the procedure. Rather, adverse effects on areas of conservation must be assessed at every relevant stage of the procedure to the extent possible on the basis of the precision of the plan. This assessment is to be updated with increasing specificity in subsequent stages of the procedure</i>'.
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⁴ No Adastral New Town Ltd (NANT) v Suffolk Coastal District Council Court of Appeal, 17th February 2015

⁵ High Court case of R (Devon Wildlife Trust) v Teignbridge District Council, 28 July 2015

⁶ Opinion of Advocate General Kokott, 9th June 2005, Case C-6/04. Commission of the European Communities v United Kingdom of Great Britain and Northern Ireland , paragraph 49.
<http://curia.europa.eu/juris/document/document.jsf?docid=58359&doclang=EN>

<ul style="list-style-type: none"> The HRA fails to include an evaluation of the most recent visitor survey of TBHSPA 2012/13. <p>2012 NE visitor survey reports a 10% increase in visitor numbers. This is neither considered nor critically appraised as a contribution to the analysis of success or failure of the TBHSPA Avoidance Strategy 2009-2014 and the implications for Policy P2, P5, E8 and E9</p> <p>The HRA fails to present evidence in the HRA whether or not current SANG or SAMMS policies are effective.</p>	<p>The 2012/13 visitor survey report NECR136 finds no statistically significant increase in visitor pressure on the SPA.</p> <p>The approach to protecting the SPA through the provision of SANG and SAMM is required by policy NRM6 of the South East Plan. It is not the role of the Local Plan HRA to test whether the approach is working. Responsibility for monitoring the effectiveness of the approach falls to the Joint Strategic Partnership Board.</p>
<ul style="list-style-type: none"> The HRA fails to properly assess the potential impact of disturbance and predation rates by newly introduced pet populations. Survey suggests 31% of households own dog and 26% a cat. 	<p>Policy NRM6 of the South East Plan sets out an approach to avoiding adverse impacts on the SPA through the provision of SANG and SAMM which reduces or eliminates the impacts from both these issues (dog walking and cat predation).</p>
<ul style="list-style-type: none"> The HRA has a lack of direct measurable observations of the level of critical components of air pollution in the HRA/reliance on hypothetical projections of pollution. <p>The HRA fails to present any evidence of current air pollution, including baseline “real world” air pollution levels derived from roadside monitoring on critical routes within the 400m-5km TBHSPA mitigation zone.</p> <p>Physical measurement must be carried and the evidence presented for further public consultation.</p>	<p>It is common practice for air quality impact assessments for Local Plans to utilise NOx concentration data from the Defra Air Quality Archive which provide background NOx concentrations to a 1x1km grid square resolution. Although modelled, these data are ‘real world’. Since the year of impact assessment lies in the future (2033) it is impossible to undertake an air quality assessment without using projections. However, these are not hypothetical but are based on the extrapolation of known historic trends (for example the long term trend for NOx concentrations nationally is one of a substantial decrease since 1970), scientific evidence (supported by the Institute of Air Quality Management) regarding improvements in vehicle emissions over the plan period and advice from central government. Measured air quality data may result in an adjusted baseline but it would not affect the trends that are shown in the air quality modelling as these will arise whatever the baseline NOx concentrations and nitrogen deposition rates.</p> <p>To account for dispersion model bias, the predicted road contribution</p>

	<p>output from the model has been adjusted by a factor of 1.5. In our experience, such a factor is appropriate to account for the bias in model performance at locations near to roads that generally experience free-flowing traffic conditions in non-urban environments.</p> <p>The 400m-5km zone is irrelevant to local air quality since there is ample evidence that roads only influence local air quality up to 200m from the roadside. Therefore, it is only roads within 200m of the Thames Basin Heaths that are relevant to consideration of local air quality impacts. The average daily vehicle flows on roads that lie within 200m of European sites, coupled with consideration of their average speeds, fleet composition and emissions factors are much more relevant data and have formed the basis of the air quality assessment.</p> <p>There is no legal requirement to undertake air quality monitoring to inform a Local Plan HRA, nor is there any legal requirement to consult the general public on a Local Plan HRA or its evidence base. Natural England is the only body the Council is legally obliged to consult and it is content with the data used in the analysis and the manner in which it was used.</p>
<ul style="list-style-type: none"> The HRA should include detailed consideration of environmental impacts in the construction and operational phase of each site not included. 	<p>Where construction-related impacts are considered possible (such as with employment sites located within 400m of Thames Basin Heaths SPA) these are explicitly referenced in the HRA. The same applies to operational effects such as air quality and recreational pressure.</p>
<ul style="list-style-type: none"> In Box 1 (page 6), the reference to regulation 61(1) of the Conservation of Habitats and Species Regulations 2010 (as amended) should be changed to regulation 102(1) of the same regulations, which specifically covers the assessment of Local Plans. 	<p>Regulations 61 and 102 are identical in terms of the process they require, the legal protection conveyed and almost all wording, but we accept that Regulation 102 should be cited in the HRA rather than Regulation 61 and that this was a typographical error.</p>

- Ockham is not discussed at all in the document. It appears in a list of 'Hamlets' and there is a statement that a 'settlement hierarchy' designation does not have HRA implications. That statement is not self-evidently true - especially in relation to creating a new town in the centre of Ockham which would be the third largest settlement in the entire borough.

Identifying a settlement hierarchy does not have HRA implications since it carries with it no information regarding the quantum or any location of specific development in any of the settlements mentioned in that hierarchy.

Draft

Appendix D and Q1: Evidence base – SPA

No Main Issues.

Draft

Appendix D and Q1: Evidence base – transport

Main Issue	Guildford Borough Council Response
<i>Representations on Specific Issues</i>	
<p><i>Strategic Sites shown as beginning prior to A3 improvements:</i></p> <ul style="list-style-type: none"> Appendix 3 of the Transport topic paper (2016) shows the phasing of housing development and transport schemes. The major improvement scheme being studied by Highways England for the A3 between the A31 and the A320 is scheduled for delivery in the period 2023/24 to 2027/28. The strategic developments at Blackwell Farm and Gosden Hill Farm are shown as being phased in from 2021/22 onwards. The Garlick’s Arch development is shown as starting in 2019/20. Therefore, there will be a period in which the existing A3 will have to carry additional traffic associated with those developments before extra capacity is provided. 	<p>For the Draft Local Plan 2017, the first year in which it is anticipated that the sites at Blackwell Farm, Gosden Hill Farm and Garlick’s Arch will deliver housing has, in each case, been slipped by one year. This is as a result of the slippage of the first five years of the plan, from 2018/19-2022/23 to 2019/20-2023/24, resulting from the Council undertaking a second Regulation 19 consultation.</p> <p>Applying a cautious approach Highways England has advised that, if a scheme is approved with funding agreed, construction is unlikely to be start until 2024 at the earliest, with construction taking 2½ years. For the Submission Local Plan, we suggested as a minor modification that the earliest date for the start of construction be changed from 2023 to 2024. The end date of construction remains as 2027.</p> <p>In the early years of the new Local Plan, the delivery of planned development and the impact of new development traffic on the Strategic Road Network (SRN) is likely to be an important ongoing consideration as the existing SRN suffers from significant congestion during peak periods. Highways England’s main concern is road safety and any proposal that adds significant levels of traffic to existing congested areas will need to be carefully assessed through the development management process for planning applications to ensure that it does not have a severe impact on road safety.</p> <p>With this in mind, the delivery of planned development has been proposed to ensure that the sites, and phasing of sites, that will be delivered in the first years of the new Local Plan, and therefore in the absence of the Department for Transport’s RIS Road Period 1 and/or</p>

	<p>Road Period 2 schemes are located where traffic associated with them will have the least impact on the SRN's links and junctions where current congestion issues are the most acute.</p> <p>Highways England has developed several targeted improvement schemes for the Guildford section of the A3, primarily to improve road safety but also providing some congestion relief. In March 2017, the Government committed funding for two of these schemes, which are included in the Proposed Submission Local Plan's Infrastructure Schedule as:</p> <p>SRN7 'A3 northbound off-slip lane widening at University Interchange (approaching Tesco roundabout) improvement scheme'</p> <p>SRN8 'A3 southbound off-slip lane widening to A320 Stoke Interchange improvement scheme'.</p> <p>The two schemes will be delivered by spring 2020. The road safety and congestion relief provided by these schemes is relevant to the delivery of planned development that will be delivered in the first years of the new Local Plan.</p> <p>Further evidence is to be provided in the study of the performance of A3 trunk road in Guildford borough to 2024 under development scenarios, the earliest date for the start of construction of the A3 Guildford scheme. This study assesses the impacts of mainline queuing resulting from blocking back of traffic exiting at diverge junctions in the peak periods, the operation of merging and diverging at junctions in the peak periods, and impact on peak spreading.</p>
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<p><i>No objective related to reducing congestion – the ‘aspiration’ will not be met:</i></p> <ul style="list-style-type: none"> The Draft Local Plan 2016 does not include a strategic objective that addresses congestion. Rather, the two strategic objectives for infrastructure (in section 3) are ‘To facilitate the timely provision of necessary infrastructure to support sustainable development’ and ‘To deliver an integrated, accessible and safe transport system, balanced in favour of sustainable transport modes, to facilitate sustainable development’. However, in paragraph 2.15 there is an aspiration expressed that there are ‘significant opportunities...to improve the performance of the road networks through transport infrastructure and service improvements’, which follows from the previous paragraph which identifies the problems of congestion. The evidence provided demonstrates that the performance of the road networks will not be improved. 	<p>For the Draft Local Plan 2017, the word ‘performance’ was changed to ‘capacity’ in this sentence in paragraph 2.15. For the Submission Local Plan, the amended sentence reads: ‘There are significant opportunities to progressively improve the opportunities for making sustainable travel choices and to improve the capacity of the road networks through transport infrastructure and service improvements.’</p> <p>Whilst the site allocations and proposals in this Plan – including the significant programme of schemes to provide and improve opportunities to use active modes, bus and rail – are intended to result in a modest modal shift over the period to 2034, we forecast that there will also be an absolute increase in overall traffic volumes. Schemes to increase highway capacity and improve road safety will mitigate the principal adverse material impacts of this growth in traffic volumes.</p> <p>Key strategy outcomes, with corresponding indicators, for reduced congestion on the Local Road Network and the Strategic Road Network are included in the indicator set for the monitoring of the Guildford Borough Transport Strategy 2017 (Guildford Borough Council, December 2017).</p>
<p><i>Park and Ride at Gosden Hill will not mitigate traffic impact at site:</i></p> <ul style="list-style-type: none"> It is not evident that the Gosden Hill Farm Park and Ride scheme ‘mitigates the traffic impact of the Gosden Hill Farm site’ (Draft Local Plan 2016 Appendix C, scheme reference P&R1), though of course there may be some residents of the new development who may choose to use the Park & Ride bus service. 	<p>The promoter of the Gosden Hill Farm site, in early discussions with Highways England, Surrey County Council and Guildford Borough Council, proposed and has continued to promote a Park and Ride scheme as part of their transport strategy for the site.</p> <p>This scheme has been identified as addressing a current ‘gap’ in the Park and Ride network for Guildford that could provide an alternative option for drivers on the A3 travelling southbound with destinations in Guildford town centre.</p>

	<p>A Park and Ride facility at the Gosden Hill Farm site is expected to intercept a number of trips that would otherwise drive onwards towards Guildford town centre, including trips through the urban area of Guildford and those continuing southbound on the A3 trunk road between the Burpham and Stoke interchanges.</p>
<p><i>The case for the Sustainable Movement Corridor has not been demonstrated as being necessary or deliverable:</i></p> <ul style="list-style-type: none"> The Draft Local Plan 2016 states, in paragraph 4.6.24, that ‘Journeys will be rapid and reliable by bus and safe and direct on foot and by bike’. The ability to deliver rapid bus services in peak periods has not been demonstrated. There has been no quantification of the potential demand to use the Sustainable Movement Corridor. Securing funding from the Local Growth Fund will require an economic justification. 	<p>This sentence in paragraph 4.6.24 has been amended in the Draft Local Plan 2017 to state that ‘The aim is for journeys to be rapid and reliable by bus and safe and direct on foot and by bike’.</p> <p>Guildford Borough Council is undertaking a major study to design for the route sections of the Sustainable Movement Corridor.</p> <p>The Enterprise M3 Local Enterprise Partnership has made a provisional allocation of £12.5 million for various projects in Guildford borough, including around £3.9 million for elements of the Sustainable Movement Corridor: West route section (scheme reference: SMC1). It is proposed that Guildford Borough Council will also make a contribution. Surrey County Council and Guildford Borough Council consulted on proposals for elements of SMC1 in September–October 2017 to inform the decision as to which elements should be delivered first, with the rest of SMC1 delivered in the future when further funding is secured. A business case for those elements to be funded by the LEP and the Council is to be submitted to the LEP in November 2017.</p>

<p><i>Feasibility and deliverability of rail improvements:</i></p> <ul style="list-style-type: none"> Supporting evidence to demonstrate the forecast demands that are addressed by the proposed rail schemes. <p>No information has been provided on the demands for and capacity of rail services.</p> <p>States that there is no supporting evidence from Network Rail or the Department for Transport to recognise the case for new rail stations at Guildford West (Park Barn) and Guildford East (Merrow).</p>	<p>The Transport Topic Paper (2017) describes the justification for the rail schemes that are included in the Infrastructure Schedule at Appendix C of the Proposed Submission Local Plan.</p> <p>In short, Network Rail’s Wessex Route Study (August 2015), supplemented by discussions with Network Rail, has informed the identification of the following schemes:</p> <p>NR1 Guildford rail station capacity and interchange improvements NR4 Electrification of North Downs Line, facilitating increased service frequency NR5 Portsmouth Direct Line improvements (together with South West Main Line Peak Demand improvements).</p> <p>Scheme NR6, North Downs Line (Great Western Railway) service frequency and timetable improvements, has been identified based on discussions with Great Western Railway and Network Rail.</p> <p>The case for the new stations at Guildford West (Park Barn) and Guildford East (Merrow), schemes referenced NR2 and NR3 respectively, was made in both the Surrey Rail Strategy: Surrey Rail Strategy Report (Surrey County Council, September 2013) and the Guildford Town and Approaches Movement Study: Strategy Report (Arup, March 2015). Guildford Borough Council is undertaking a feasibility study to consider further the case for the Guildford West (Park Barn) station, which will provide evidence to Network Rail’s GRIP 2 standards, and Network Rail considers that, subject to further assessment and approval, the delivery of a new station at Guildford East (Merrow) is feasible and viable. FirstGroup MTR South Western Trains, which was recently awarded the South Western franchise for a period of seven years from August 2017, has publically committed to work with stakeholders to progress the plans for new stations at Guildford West (Park Barn) and Guildford East (Merrow).</p>
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Air Quality impact:

- Air pollution should be considered in the light of the measurements taken on the A3 at the junction with the M25 (very little traffic can leave the A3 between these two points) which exceed national and international safety levels.

An increase in the pollution levels by some 30% cannot be considered 'sustainable' and must be considered unsound planning as it fails the legislative requirement on Pollution Levels.

AECOM undertook an Air Quality Review of Guildford Borough Proposed Submission Local Plan: Strategy and Sites "June 2017" (June 2017). This was a qualitative-risk based review, which considered the risk of significant air quality effects (in terms of annual mean concentrations of NO₂, PM₁₀ and PM_{2.5}) occurring with the implementation of the Draft Local Plan 2017. Consideration of risk was based on the size and nature of anticipated developments, their location, ambient air quality around potential developments and the locations of sensitive receptors to air quality around potential developments (including residential properties, schools and hospitals).

The findings suggest that the effect of the Draft Local Plan on annual mean NO₂ concentrations will be negligible and not a key constraint on development in the majority of the borough. Further, detailed modelling was recommended as being advisable around roads where notable changes in traffic flows are predicted, at locations in close proximity to sensitive receptors; albeit in each case it was considered unlikely that these development-related increases would lead to an exceedance of the air quality objective.

For particulate matter – both PM₁₀ and PM_{2.5} – negligible effects are anticipated at all sensitive receptors for air quality.

It was also recommended that the findings of the Air Quality Review be confirmed as part of the planning application processes for specific sites. Accordingly potential air quality issues have been added as a 'key consideration' for policies A24 Slyfield Area Regeneration Project, A25 Gosden Hill Farm, A26 Blackwell Farm and A29 Land to the south and east of Ash and Tongham.

The potential effect on European designated ecological sites such as the SPA is considered in detail in the Habitat Regulations Assessment (2017). This finds that the Local Plan will not result in likely significant effects upon the SPA as a result in changes in air quality,

	<p>notwithstanding the likely elevation in NOx concentrations along some road links (HRA, paragraph 10.4.14).</p> <p>The Council also manages local air quality through the Local Air Quality Management regime. At present, there are no Air Quality Management Areas (AQMAs) in the borough, although an AQMA covering a small area in the village of Compton may be designated shortly, subject to the outcome of a consultation with affected residents. If an AQMA is designated, the Council will put together a Local Air Quality Action Plan to improve the air quality in this area.</p>
<p><i>SHAR 2016: Trip generation does not include pass-by trips, diverted trips and internalisation of trips for the large sites:</i></p> <ul style="list-style-type: none"> In the Guildford Borough Proposed Submission Local Plan “June 2016”: Strategic Highway Assessment Report (Surrey CC, June 2016) (hereafter the SHAR 2016), the trip generation for the large sites does not include any consideration of the effect of pass-by and diverted trips or of the effect of the internalisation of trips. For a development the size of Blackwell Farm, with a mix of uses that are likely to result in significant internalisation of trips, the overall trip generation should be reduced to reflect these factors. Taken together with the other large sites with mixed uses such as Gosden Hill Farm, the former Wisley airfield and the land to the south of Normandy and north of Flexford, the overestimation is likely to be several hundred vehicle trips in each peak. The SHAR 2016 acknowledges that the large sites will generate trips that are wholly contained within their boundaries, for example school trips. 	<p>It is agreed that there is an over-estimation of the number of trips generated/attracted by the Draft Local Plan 2016 sites in the SHAR 2016 due to these factors.</p> <p>The inclusion of Pass-by trips and diverted trips will be considered for inclusion in further modelling runs.</p>

<p><i>SHAR 2016: Trip generation does not include pass-by trips, diverted trips and internalisation of trips for the large sites:</i></p> <ul style="list-style-type: none"> • The SHAR 2016 attaches limited weight to the negative effects of Scenario 5 in terms of increased car use overall attracted by the provision of additional capacity on the Strategic Road Network. The capacity improvements appear to attract additional vehicles to the network that are unrelated to development. 	<p>The implications of the SHAR 2016 has been assessed by both Surrey County Council and Highways England as local and strategic highway authorities.</p> <p>Their comments are contained in their responses to the Regulation 19 consultations on the Draft Local Plan.</p>
<p><i>SHAR 2016: Error in Strategic Highways Assessment:</i></p> <ul style="list-style-type: none"> • The site referenced as 2258 in Appendix A is described as “Land south east of London Road Land south east of London Road, Send (part of B13-d) (known as Burnt Common)” and allocated for 260 homes and 140 flats – appears that this refers to the site Land around Burnt Common Warehouse, which was not a site allocation in the Draft Local Plan 2016. This shows high degree of inconsistency in the appraisal and unclear if the site is appraised. 	<p>GBC acknowledges that the site was incorrectly described in Appendix A of the SHAR 2016, and this entry is related to the Garlick’s Arch site (Policy A43).</p> <p>However, this does not affect the outputs from the transport model as the increased flows associated with this site was applied to the centroid connector for a zone which encompasses both the Garlick’s Arch site (Policy A43) and Burnt Common site (Policy A58) and therefore there would be no differential impact on the forecasts.</p> <p>In the Draft Local Plan 2017 (and in the Submission Local Plan), it is proposed to remove the allocation of 7,000 sq m of industrial land (comprising either or a mix of B1c, B2 and B8) from the Garlick’s Arch site (Policy A43). Instead, the 7,000 sq m of industrial land is proposed to be allocated to the land around the Burnt Common warehouse (Policy A58).</p>

<p><i>SHAR 2016: Averaging of peak hours is an unsuitable methodology:</i></p> <ul style="list-style-type: none"> The SHAR 2016 understates existing traffic levels by using a process of averaging over the three peak hours. For the recent planning application for the former Wisley Airfield site, Highways England found the averaging approach unsatisfactory for the Strategic Road Network. Accordingly, there is no justification for using it to assess the Local Road Network. 	<p>Different parts of the road network have different peak periods and therefore modelling one peak hour may not necessarily reflect traffic conditions across the whole borough.</p> <p>Further evidence is to be provided in the study of the performance of A3 trunk road in Guildford borough to 2024 under development scenarios, the earliest date for the start of construction of the A3 Guildford scheme. This study assesses the impacts of mainline queuing resulting from blocking back of traffic exiting at diverge junctions in the peak periods, the operation of merging and diverging at junctions in the peak periods, and impact on peak spreading.</p> <p>This further work will complement the SHAR 2016 and its Addendum.</p>
<p><i>SHAR 2016: Trip generation for Policy A35 excludes various items, TRICS data is not relevant and traffic impact understated against empirical traffic counts:</i></p> <ul style="list-style-type: none"> The SHAR 2016 assumes decrease in vehicle movements and does not include traffic from secondary school, waste lorries, buses. The TRICS data used for comparison is not relevant and the traffic counts are not consistent with counts submitted to council. The modelling is flawed as not consistent with real experience and understates by 1,000 vehicles movements and uses 2001 census based data. 	<p>The SHAR 2016 forecast traffic flows for site Policy A35 based on the Draft Local Plan 2016 quantum of development. The assumptions are set out in the SHAR 2016 and its appendices; in the appendices the allocation for Policy A35 are those in zone number 577. The development traffic flows for this site are shown in Tables 3.3 and 3.4 of the SHAR 2016.</p>
<p><i>SHAR 2016: Additional traffic from RHS permission is not included:</i></p> <ul style="list-style-type: none"> The SHAR 2016 does not account for additional traffic from RHS planning permission. 	<p>The assessment is for a point in time and therefore can only take account of the committed development at that time.</p>

<p><i>SHAR 2016: Adjacent borough growth modelled using growth factors rather than actual:</i></p> <ul style="list-style-type: none"> • Whilst the draft Local Plans for Waverley and Guildford boroughs were modelled together, it is not clear whether other adjacent boroughs have been dealt with adequately as they appear to rely on general growth factors rather than proposed site developments near Guildford borough that could have a very significant impact on the road network in Guildford borough. 	<p>Outside of Guildford and Waverley boroughs, all scenarios account for trips representing full development in the rest of the United Kingdom to 2031, including background growth, using the Department for Transport’s forecasts.</p>
<p><i>SHAR 2016: Too much capacity in the model – baseline incorrect:</i></p> <ul style="list-style-type: none"> • The link capacities used in SINTRAM are too high having regard to local knowledge concerning the effect of pinch points and considering the implied gap between vehicles, bearing in mind that traffic does not flow evenly spread and weather and road conditions are not always ideal. <p>The result of modelling understated baseline traffic flows is a failure to fully identify existing congestion hotspots, and accordingly the highways infrastructure requirements have been severely underestimated.</p> <p>SINTRAM uses only a very crude approach to assessing issues at junctions and concentrates only on link capacities and the associated ratios of link flow to capacity (RFC approach). The separate “Level of Service” (LOS) approach appears to be limited to just a small selection of the many congested junctions across the borough.</p>	<p>The SINTRAM model looks at average peak hour trips – this is standard transport modelling methodology.</p> <p>The SHAR 2016 represents a robust “worst case” in terms of transport demand and supply assumptions, as it does not assess and therefore does not account for the mitigation; including the potential for modal shift, and the new and improved sustainable transport choices provided by the rail, bus and active modes schemes included in the Draft Local Plan 2016 and makes no allowance for any internalisation of trips within the larger sites.</p> <p>A strategic model is the most suitable model for testing draft Local Plans to determine the high-level traffic impacts and infrastructure requirements.</p> <p>It is at the planning application stage that the detailed traffic impacts of a site or site allocation should be assessed through the provision of a Transport Statement or Transport Assessment and a Travel Plan in accordance with Policy ID3 and the NPPF.</p>

<p><i>SHAR 2016: Cannot compare results with previous strategic highway assessment studies of Guildford borough:</i></p> <ul style="list-style-type: none"> • The model has been revalidated, though this was not stated in the SHAR 2016. The latest version contains less traffic than the previous one. This makes it infeasible to compare results with those of the earlier studies for Guildford borough, namely the Preliminary Growth Scenarios Transport Assessment and the Options Growth Scenarios Transport Assessment. 	<p>The SHAR 2016 is a stand-alone document that is a technical report on the strategic highway assessment of the spatial strategy in the Draft Local Plan 2016. It is not required to be comparable with previous work as the SHAR 2016 has a number of options including a 'Do-Minimum' scenario that the impact of the Draft Local Plan 2016 can be assessed against. The fact that the model has been revalidated is purely a function of the requirement to provide a robust traffic model that reflects traffic issues at the year of the validation.</p>
<p><i>SHAR 2016: Does not model changes to town centre (TCMP):</i></p> <ul style="list-style-type: none"> • The SHAR 2016 has not assessed the masterplan for Guildford town centre, which includes potential road closure and re-routing. 	<p>The SHAR 2016 assessed the mitigation provided by key highway schemes from the programme of transport schemes that were considered necessary for the delivery of the Draft Local Plan 2016.</p> <p>The Guildford Town Centre and Hinterland Masterplan Report (Final draft report for consultation, October 2015) was prepared by a consultant team led by Allies and Morrison Urban Practitioners. The Council's Executive, in March 2016, agreed a recommendation as follows: 'That the Executive approves the Town Centre Masterplan prepared by Allies & Morrison and the extensive consultation as a guide for the ongoing work of the GBC Major Projects team who will, where appropriate, present proposals in a manner that is compatible with the Local Plan and planning requirements.'</p> <p>The draft masterplan is neither a Development Plan Document nor a Supplementary Planning Document. The document has limited, if any, weight as a material consideration in planning terms.</p> <p>Accordingly, highway schemes identified in the draft masterplan were not assessed in the SHAR 2016.</p>

<p><i>SHAR 2016: Impact of Slyfield Area Regeneration Plan not accounted for in traffic modelling:</i></p> <ul style="list-style-type: none"> Slyfield – there are no remarks relating to SARP, and as there are no additional trips shown in and out of the Slyfield residential zone in Tables 3.3 and 3.4, it is possible that this development has been omitted in error. If so, this means that further tests should be carried out with the extra trips included. There is a significant increase in trips to and from the Slyfield industrial zone, which will impact on the A320 and Clay Lane. 	<p>The SARP site allocation was included in zone 306 ‘Slyfield Industrial’ as this was considered the most appropriate zone. Therefore, the strategic site has been accounted for in the SHAR 2016 and the impact on the A320 and Clay Lane has been assessed.</p>
<p><i>No highways mitigation for Guildford town centre:</i></p> <ul style="list-style-type: none"> The Draft Local Plan 2016 provides no policy statement relating to transport in Guildford town centre, which means that there is no vision set out, in spite of the work that has been carried out for Guildford Borough Council over the past two years. <p>The SHAR has very little to say about the town centre. The model results forecast severe congestion on the approaches to the town centre including A281 Millbrook, the A31 Farnham Road, and A322 Woodbridge Road for example. There are no highway mitigation measures in the Draft Local Plan 2016 for Guildford town centre.</p>	<p>The Spatial Vision, as amended by the Draft Local Plan 2017, states that ‘The transport strategy and Local Plan policies will be aligned to encourage residents, employees and visitors to use alternative modes of transport and to seek to reduce car traffic especially through the town.’</p> <p>There are a number of transport schemes identified for Guildford town centre, in part or in whole. As amended by the Draft Local Plan 2017, these schemes are: NR1, LRN1, LRN23, SMC2, SMC3, SMC4, BT1, AM1 and AM2.</p> <p>Points (3), (4), (5) and (11) of Policy ID3 Sustainable transport for new developments are of particular relevance to transport in Guildford town centre.</p> <p>The Council operates many of the town centre car parks, the Park and Ride sites and manages on-street parking for Surrey County Council, and so is also able to influence patterns of travel by car through its joint parking strategy with Surrey County Council.</p>

<p><i>SHAR 2016: Scenario 5 does not show improvement i.e. reduction in congestion with A3 scheme:</i></p> <ul style="list-style-type: none"> It is necessary to combine information from several tables in the SHAR. Table 4.5 shows that the M25 and A3 will be at capacity in Scenario 5. The other roads that will have poor levels of service include those in Table 4.5 but also those in 4.12 (except the A3), and those in Tables 4.3 and 4.4 with levels of service E and F that will not benefit from the improvement of the A3 in Scenario 5. Paras 4.10.3, 4 and 5 point out that there will be increased congestion. Given that the starting point is unsatisfactory, there can be no expectation that the schemes in the Infrastructure Development Plan will provide an overall improvement. 	<p>The SHAR 2016 concludes that “The results show that for Scenario 5, which represents the quantum and distribution of development proposed in the Proposed Submission Local Plan together with the key highway schemes, there will not be a severe impact on the local and strategic highway network” (p.62). The addendum to the SHAR 2016 (Guildford BC, June 2017) found that this conclusion was “not considered likely to change” as a result of the key changes made to proposed site policies and to the programme of transport schemes in the Draft Local Plan 2017.</p> <p>It is conceded that the full impacts of traffic from new developments cannot always be cost-effectively mitigated through highway improvements and National Planning Policy Framework recognises this at paragraph 32.</p> <p>The implications of the site allocations and proposals in the Local Plan on the highway network are explained in paragraph 4.6.28 of the Draft Local Plan 2017.</p>
<p><i>No mitigation for A3100 / B2234 Burpham roundabout:</i></p> <ul style="list-style-type: none"> The SHAR 2016 shows that there will be significant problems at the A3100/B2234 roundabout under all scenarios which is not addressed and there is no discussion of the potential air quality impacts. 	<p>The SHAR 2016 concludes that “The results show that for Scenario 5, which represents the quantum and distribution of development proposed in the Proposed Submission Local Plan together with the key highway schemes, there will not be a severe impact on the local and strategic highway network” (p.62). The addendum to the SHAR 2016 (Guildford BC, June 2017) found that this conclusion was “not considered likely to change” as a result of the key changes made to proposed site policies and to the programme of transport schemes in the Draft Local Plan 2017.</p> <p>It is considered that the Local Road Network can be improved as necessary in order to maintain its safe operation and performance. Scheme LRN6 Interventions to address potential highway</p>

	<p>performance issues resulting from development at Gosden Hill Farm site is included in the Infrastructure Schedule.</p> <p>See above for the Council's response regarding 'Air Quality impact'.</p>
<p><i>SHAR 2016: Traffic impacts of new rail station at Park Barn (A59) not assessed:</i></p> <ul style="list-style-type: none"> Anticipated vehicle activity associated with the policy A59 allocation (2017 Plan) for the new station has not been included in the traffic model, and increase in traffic in local area and vehicle routing across the network has not been assessed. <p>Added congestion a cause for concern given congested nature of local road network.</p>	<p>It is expected that, borough-wide, modal shift of car to rail trips will significantly outweigh new vehicle trips to access the new rail station. The station is not planned to be a 'parkway' station so sustainable transport options for travel to and from the site will be the priority.</p> <p>The SHAR 2016 did not account for the potential for modal shift encouraged by new and improved sustainable transport choices provided by rail, bus and active modes schemes in the draft Local Plan 2017.</p> <p>The new station will serve the existing community, the employment and educational destinations in the area, including the University of Surrey's Manor Park campus, the Surrey Research Park and the Royal Surrey County Hospital, as well as serving the Blackwell Farm site.</p>
<p><i>Need to future proof for the impact of new technology:</i></p> <ul style="list-style-type: none"> The local road strategy in the Guildford Borough Transport Strategy 2017 (Guildford Borough Council, June 2017) allows for 30 electric car charging points, this is likely to be an underestimate in the coming 20 years, given the rapid increase in acceptance and adoption of electric/hybrid cars in recent years. 	<p>The increasing numbers of electric and hybrid vehicles will require additional infrastructure to be put in place to maintain the uptake of these vehicles.</p> <p>The Local Plan will not prevent new charging points from being installed, as and when demand dictates.</p>

<p><i>Changes which the Addendum to the SHAR (2017) should have taken into account:</i></p> <ul style="list-style-type: none"> • There is uncertainty over the highway capacity implications of the Sustainable Movement Corridor in the town centre and possible changes to the town centre gyratory, as discussed in the Guildford Town Centre Regeneration Strategy 2017 (Guildford Borough Council, January 2017), which indicates that the intention is to reduce the capacity of the town centre network. The experimental closure of Walnut Tree Close is already being planned. Taking into account the demand forecast on the A281, the A322 and A31 in Table 4.12, the consequences of such a reduction will be far-reaching. 	<p>The SHAR 2016 assessed the mitigation provided by key highway schemes from the programme of transport schemes that were considered necessary for the delivery of the Draft Local Plan 2016.</p> <p>The Guildford Town Centre Regeneration Strategy 2017 was approved in January 2017 by the Council's Executive. The Guildford Town Centre Regeneration Strategy 2017 has limited, if any, weight as a material consideration in planning terms.</p> <p>The councils have, at various points in time, considered options for changes to the gyratory in the town centre since at least since the 1990s. At present, there are no preferred or committed proposals, and none are expected to be brought forward in the near future. Therefore, we did not consider that it was appropriate to consider the traffic impacts of such options in the preparation of the Draft Local Plan.</p> <p>The Walnut Tree Close scheme is an experimental scheme. Surrey County Council will undertake impacts monitoring. Therefore, we did not consider that it was appropriate to consider the traffic impacts of such options in the preparation of the Draft Local Plan.</p>
<p><i>Changes which the Addendum to the SHAR (2017) should have taken into account:</i></p> <ul style="list-style-type: none"> • Policy A26: New secondary school at Blackwell Farm will add to morning peak hour traffic which was not included in the 2016 modelling. <p>The change to Policy A29: Land to the south and east of Ash and Tongham involving more houses which means that there will be more traffic locally. While this will not be 'major' in terms of the borough as a whole, it will be significant locally. Ash and its surroundings will be impacted by the large Wellesley expansion in Aldershot. It is not clear to what extent the modelling reported in the SHAR allowed for this development. The pressure on the A331 and the roads</p>	<p>Blackwell Farm is a preferable location for a new secondary school in comparison with the former Policy A46 Land to the south of Normandy and north of Flexford site, in relation to both school place planning and sustainability perspectives.</p> <p>With the new secondary school delivered on the Blackwell Farm site, as opposed to the deleted Policy A46 site, it is expected that there will be an increase in the site's internalisation of trips with two of the six forms of entry at the school needed to serve the site itself.</p> <p>In addition, the Draft Local Plan 2017 includes scheme SED5 in the Infrastructure Schedule for the expansion of Ash Manor Secondary</p>

connecting Aldershot to Guildford and Woking will increase.

The DfT/HE M25 south-west quadrant strategic study: stage 3 report concludes that the focus should not be on widening the existing road further beyond currently planned schemes but on how to reduce pressures and provide parallel capacity to relieve this part of the network. If the M25 and A3 are at capacity, then the Wisley development will add pressure on local roads that are not well-suited to carrying higher volumes of traffic. This is also relevant to the proposed developments at Burnt Common. The consequences for Ripley are likely to be serious.

A comprehensive up-to-date analysis is required to inform decision-making. This should include analysis of the mid-term stage of the plan, before the A3 improvement is complete, as well as 2034.

School by an additional one form of entry to provide spaces for children who will live around Ash and Tongham. The new secondary school on the Blackwell Farm site is therefore expected to provide only six forms of entry, as opposed to being a direct replacement for the formerly proposed new secondary school on the now deleted Policy A46 site which was expected to provide seven forms of entry.

New developments that will generate significant amounts of movement will, at the planning application stage, be supported by a Transport Statement or Transport Assessment, and subject to the policy tests in NPPF paragraph 32 and Policy ID3. Individual new developments may be required to provide mitigation measures additional to those in the Infrastructure Schedule.

With respect to Policy A29, as stated in the Addendum to the SHAR 2016: 'The overall scale of growth in this strategic location for development has remained consistent but the capacity of the allocation for this site policy has been increased from 1,200 to 1,750 homes. The site policy now includes the various planning permissions in this area that have not yet commenced. There are no implications for the SHAR 2016 of this change.' (p10.) In addition, the SHAR 2016 modelling utilised TEMPRO data for areas outside of Guildford and Waverley to take account of growth levels.

Schemes SRN3 and SRN5 for the improvement of the M25 Junction 10 Wisley interchange and the M25 Junctions 10-16 are currently planned schemes.

Further evidence is to be provided in the study of the performance of A3 trunk road in Guildford borough to 2024 under development scenarios, the earliest date for the start of construction of the A3 Guildford scheme. This study assesses the impacts of mainline queuing resulting from blocking back of traffic exiting at diverge junctions in the peak periods, the operation of merging and diverging at junctions in the peak periods, and impact on peak spreading.

Air Quality Review of Guildford Borough Proposed Submission Local Plan: Strategy and Sites “June 2017” (Aecom, June 2017):

- Evidence presented in the Air Quality Review of Guildford Borough Proposed Submission Local Plan: Strategy and Sites “June 2017” (GBC, June 2017) with respect to the risk of significant air quality effects in Compton are erroneous.

AECOM undertook an Air Quality Review of Guildford Borough Proposed Submission Local Plan: Strategy and Sites “June 2017” (June 2017). This was a qualitative-risk based review, which considered the risk of significant air quality effects (in terms of annual mean concentrations of NO₂, PM₁₀ and PM_{2.5}) occurring with the implementation of the Draft Local Plan 2017. Consideration of risk was based on the size and nature of anticipated developments, their location, ambient air quality around potential developments and the locations of sensitive receptors to air quality around potential developments (including residential properties, schools and hospitals).

The findings suggest that the effect of the Draft Local Plan on annual mean NO₂ concentrations will be negligible and not a key constraint on development in the majority of the borough. Further, detailed modelling was recommended as being advisable around roads where notable changes in traffic flows are predicted, at locations in close proximity to sensitive receptors; albeit in each case it was considered unlikely that these development-related increases would lead to an exceedance of the air quality objective.

For particulate matter – both PM₁₀ and PM_{2.5} – negligible effects are anticipated at all sensitive receptors for air quality.

It was also recommended that the findings of the Air Quality Review be confirmed as part of the planning application processes for specific sites. Accordingly potential air quality issues have been added as a ‘key consideration’ for policies A24 Slyfield Area Regeneration Project, A25 Gosden Hill Farm, A26 Blackwell Farm and A29 Land to the south and east of Ash and Tongham.

The potential effect on European designated ecological sites such as the SPA is considered in detail in the Habitat Regulations Assessment (2017). This finds that the Local Plan will not result in likely significant

effects upon the SPA as a result in changes in air quality, notwithstanding the likely elevation in NOx concentrations along some road links (HRA, paragraph 10.4.14).

The Council also manages local air quality through the Local Air Quality Management regime. At present, there are no Air Quality Management Areas (AQMAs) in the borough, although an AQMA covering a small area in the village of Compton may be designated shortly, subject to the outcome of a consultation with affected residents. If an AQMA is designated, the Council will put together a Local Air Quality Action Plan to improve the air quality in this area.

Draft

Appendix E: Superseded policies

No Main Issues.

Appendix F: Policies Map

No Main Issues.

Appendix G: Policy and Monitoring

No Main Issues.

Draft

Main Issues - Questionnaire

Question 1 – The evidence base and submission documents

Main issues in relation to the evidence base are covered in Appendix D.

Main issues in relation to Policy and Site Allocations are covered in the respective section.

Draft

Question 2 – Legal compliance

Main Issues	Guildford Borough Council Response
<i>Representations on Specific Issues</i>	
<p><i>Changes are significant therefore Reg. 19 not suitable:</i></p> <ul style="list-style-type: none"> • These changes are significant so require another full consultation under Regulation 18, not the short-cut of Regulation 19 which the Council is using. <p>The regulation 19 consultation is flawed as major changes have taken place since the last consultation.</p>	<p>Regulation 19 is the only requirement for consultation after Regulation 18 so consultation process has been legally compliant. The Council considered all comments but only made changes where considered necessary or appropriate.</p>
<p><i>Plan not balanced:</i></p> <ul style="list-style-type: none"> • The plan is not balanced in line with the NPPF - focuses on economic development and growth at the expense of the other aspects such as environmental protection. <p>The Plan preparation process has had inadequate regard for national policy which attaches “great importance” to the “openness” and “permanence” of Green Belt</p>	<p>The plan does achieve the balance required by the NPPF. Exceptional circumstances have been demonstrated to justify alterations to the Green Belt boundary. Protection has been afforded to environmental constraints within the context of seeking to meet needs.</p> <p>Revision to Green Belt boundaries as part of local plan reviews is sign posted in the NPPF (para. 83) and becoming increasingly necessary to meet future housing requirements and avoid future unplanned development. The Government has clarified in the new Housing White Paper that housing need can constitute a valid reason for reviewing a green belt boundary. This was found to be the case in the Waverley Examination in June 2017.</p>
<p><i>Not developed or assessed alternatives:</i></p> <ul style="list-style-type: none"> • The Council has not (a) taken a meaningful approach to developing alternatives and options nor (b) assessed them against evidence, or applied a sustainability appraisal in a logical manner. 	<p>Comment does not have factual basis and is incorrect. The plan is the outcome of two previous consultations which included an issues and options consultation (including site options, initial SA and HRA screening) and a draft Local Plan Strategy and Sites consultation.</p>

<p><i>Exceptional circumstances not demonstrated:</i></p> <ul style="list-style-type: none"> • Huge areas have been taken out of green belt for development without any exceptional circumstances being put forward to justify this, without any exceptional circumstances being put forward for a major road through the AONB or a major settlement in the setting to the AONB 	<p>Revision to Green Belt boundaries as part of local plan reviews is becoming more necessary to meet future housing requirements and avoid unplanned, unsustainable development in future. NPPF paragraph 83 indicates that boundaries can be amended as part of a local plan review. The Government has clarified in the new Housing White Paper that housing need constitutes an acceptable reason for doing this.</p> <p>Most of site A26 (Blackwell Farm) falls outside of the AONB and development should not have an impact. The allocation policy states that the access road will be sympathetically designed to avoid adverse impact. Other sites also abut the AONB but not an issue. The Green Belt and Countryside Topic Paper provides the justification for amending the Green Belt boundary.</p>
<p><i>Impact on TBHSPA unavoidable therefore not legally compliant:</i></p> <ul style="list-style-type: none"> • RSPB considers that it would not be possible for the proposed mitigation measures to overcome the impacts upon the TBHSPA. Therefore cannot conclude that the Plan will avoid adverse effect on integrity of TBHSPA. 	<p>The Local Plan Strategy and Sites has progressed through the Habitats Regulations Assessment (HRA) process. The HRA for the plan concludes that the plan as a whole would not have an adverse impact on the integrity of the TBHSPA</p> <p>Individual development proposals are considered against the Council's adopted Thames Basin Heaths Special Protection Area Avoidance Strategy, which is compliant with the requirements of the Habitats Regulations and policy NRM6 of the South East Plan. Local Plan Strategy and Sites Policy P5 codifies these requirements into Local Plan policy. As a result, the Council will not grant permission for developments that would have an adverse impact on the TBHSPA (except where there are Imperative Reasons of Overriding Public Interest, as set out in the Habitats Regulations).</p>

<p><i>Restriction of consultation to ‘changes only’ in Proposed Draft Local Plan not legally compliant:</i></p> <ul style="list-style-type: none"> • Many of the changes impact on policies and site allocations which are unchanged. The limitation in this consultation conflicts with NPPF para 155. The significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes. <p>The consultation statement on the responses to the 2016 draft plan was not published. The restriction to changes is not legally compliant.</p>	<p>The Council disagrees with this comment. Our legal advice indicates that it was appropriate to undertake a targeted consultation on changes to the plan only.</p>
<p><i>Exceptional circumstances not demonstrated:</i></p> <ul style="list-style-type: none"> • The Plan does not provide evidence of the exceptional circumstances, which would justify this use of Green Belt land. Nor does the Plan justify the exclusion of further development on brownfield sites and urban areas sites. More such sites should be included to make the Plan legally compliant. 58% of this is on Green Belt (Gosden Hill, Wisley, Blackwell Farm). 	<p>The Plan adopts a spatial hierarchy set out in S2. This seeks to sequentially meet our development needs in areas that are most sustainable and outside the Green Belt. However, there are insufficient suitable and sustainable sites within these areas to meet our needs. For this reason, we need to consider whether there are exceptional circumstances to justify amending Green Belt boundaries. The Council considers there are and the justification for this is set out in more detail in the Housing Delivery Topic Paper.</p>

Question 3 – Soundness

Main Issue	Guildford Borough Council Response
<p>Representations from Prescribed Bodies and Selected Stakeholders</p>	
<p>Environment Agency <i>Infrastructure Delivery Plan – Water quality:</i></p> <ul style="list-style-type: none"> Plan does not reflect the evidence submitted in the Infrastructure Delivery Plan for wastewater capacity issues, which may result in an adverse impact on water quality. The Plan is not consistent with the National Planning Policy Framework (NPPF), paragraph 109, and is not justified by a robust evidence base. <p><i>Flood Risk Sequential and Exception Tests - site allocations and the justification for promoting certain sites:</i></p> <ul style="list-style-type: none"> We do not consider that sufficient evidence has been presented in this supporting document to justify the conclusions drawn in the Plan with respect to the allocation of certain sites. Without this evidence the Plan is not justified. <p><i>Policy P4 – Flooding, flood risk and groundwater production zones:</i></p> <ul style="list-style-type: none"> We do not consider that sufficient reference has been made to the impacts of climate change on the flood risks associated with development. We consider that without specific mention of the flood risks associated with climate change that the Plan is not consistent with paragraph 99 of the NPPF. <p><i>Site Allocation Policies</i></p> <ul style="list-style-type: none"> Policies A5: Jewsons, Walnut Close, Guildford; A13: Kernal Court, Walnut Close, Guildford; and A14: Wey Corner, Walnut Tree Close, Guildford, do not have the evidence on 	<p>Discussions with the Environment Agency resulted in the Council commissioning a Water Quality Assessment to overcome this inconsistency with the NPPF. The Council published this document as part of the evidence base for the 2017 consultation.</p> <p>The Council updated Policy P4 to refer to the requirement for developers to demonstrate, in a site-specific flood risk assessment, that their proposed development will be safe <i>‘for its lifetime, taking into account climate change’</i> (para. (2)(c)). It also now requires site drainage systems to be <i>‘appropriately designed taking account of storm events up to 1 in 100 year chance of flooding with an appropriate allowance for climate change’</i> (para. (2) (f)).</p> <p>The Strategic Flood Risk Assessment (SFRA) Level 1 and Level 2 provide the evidence needed to justify the conclusions drawn in the plan. The SFRA documents were updated to more clearly explain the approach taken to assessing the flood risk on the allocated sites, which takes into account climate change. The SFRA now advises applicants to consider the Government’s latest climate change guidance before submitting a planning application to us if recent national guidance amendments are liable to affect the likelihood of them being able to develop a site safely, taking account of flood risk. Policies for site allocations in the Proposed Submission Local Plan 2017 that are affected by flood risk draw on this evidence by referring to the need for applicants to have regard to the SFRA’s recommendations.</p> <p>The Level 2 SFRA has been updated via a 2017 addendum to include</p>

<p>access and egress to support their allocation in the Plan. Without this evidence the deliverability of these sites is questionable and their inclusion is not consistent with NPPF paragraphs 100-102 of the NPPF.</p>	<p>specific recommendations for access and egress for the sites in Walnut Tree Close. This document takes account of the advice of the Environment Agency.</p>
<p><i>Representations on Specific Issues</i></p>	
<p><i>Lack of evidence:</i></p> <ul style="list-style-type: none"> Plan not based on proportionate evidence and no evidence for housing number. 	<p>Evidence for overall housing target is from the SHMA, which is available on the evidence base page of the Council's website.</p>
<p><i>Question over deliverability:</i></p> <ul style="list-style-type: none"> To be considered sound the Plan needs to demonstrate which of the proposed allocated sites are considered deliverable (as opposed to developable) and will be expected to deliver the full range of housing necessary to demonstrate and maintain a five-year supply of housing land to meet the housing target from the base date of 2018. 	<p>Issue covered in the Housing Delivery Topic Paper. This is also discussed in the responses to S2 Policy comments as a Main Issue.</p>
<p><i>Lack of detail on key infrastructure:</i></p> <ul style="list-style-type: none"> No detailed plans for the railway station at Park Barn and Network Rail has not confirmed the status of either. These schemes must have a sounder footing to be included in the Plan. 	<p>GRIP 2 study underway. Network Rail is supportive. Site now included in the Plan.</p>
<p><i>5 year housing supply unlikely to be achieved:</i></p> <ul style="list-style-type: none"> Housing numbers are heavily 'back loaded' – means immediate significant shortfall in the housing land supply not addressed and five year housing supply is unlikely to be achieved. Too great a proportion of housing will come forward towards end of plan period. Plan fails to achieve 5-year land supply. <p>Plan needs to identify more sites in 1-5 year period. Spatial Strategy and proposed phasing of housing will not deliver Guildford's Objectively Assessed Need within a reasonable timeframe.</p>	<p>Issue discussed in the Housing Delivery Topic Paper.</p>

<p><i>Reliance on key infrastructure poses risk to supply:</i></p> <ul style="list-style-type: none"> Reliance on bringing key items of infrastructure forward for a significant proportion of identified sites poses risk on supply coming forward early in the plan period at a sustained rate and does not allow for choice or competition within the market. <p>Reliance on large strategic sites delivered in the latter part of the plan period, for both housing and infrastructure delivery has not been justified against reasonable alternatives. Nor has it been demonstrated to be deliverable and is therefore not effective.</p> <p>Plan should include additional smaller sites to improve delivery and avoid under-supply in the event that the strategic sites do not come forward on time, or, are proved to be not viable.</p>	<p>The rationale for the proposed spatial strategy is set out in more detail in the Housing Delivery Topic Paper. Whilst strategic sites have longer lead in times, they are also able to provide for a greater level of associated infrastructure. Whilst we have sought to maximise the number of smaller greenfield sites that are less reliant upon the delivery of significant infrastructure, it is not possible using only these to sustainably accommodate the level of growth required to meet our OAN.</p> <p>The Council accepts that there is a degree of risk to the delivery of these large sites and therefore we have reduced the quantum assumed to be delivered on strategic sites within the plan period and in addition to this have built in a buffer of approximately 10% over and above the housing requirement.</p>
<p><i>Alternatives not explored:</i></p> <ul style="list-style-type: none"> In relation to Custom and Self-build, the Plan does not represent the most appropriate strategy when considered against reasonable alternatives - relies too heavily on the four strategic sites, which in turn rely heavily on central Government infrastructure funding to move forward. 	<p>The Self-Build and Custom Housebuilding Act 2015 as amended by the Housing and Planning Act 2016 place a duty on local authorities to give suitable development permission for enough serviced plots of land to meet the demand for self-build and custom housebuilding in their area. Planning Practice Guidance (July 2017) has been recently updated to give further Government guidance. The Council can meet these duties and the demand for self-build and custom housebuilding in Guildford by requiring the provision of suitable plots on larger housing sites through the Local Plan. It is an approach also taken by other local authorities with emerging or adopted Local Plans.</p>
<p><i>Fails to deliver housing to meet needs of constrained neighbouring boroughs:</i></p> <ul style="list-style-type: none"> Effective joint working not demonstrated - Failed to deliver more housing to meet needs of neighbouring boroughs whom are more heavily constrained. 	<p>See Duty to Cooperate Topic Paper.</p>

<ul style="list-style-type: none"> Given previously The Council had identified additional capacity for development through a range of safeguarded sites which would have ensured sufficient flexibility in the plan, the removal of sites with minimal justification and The Council stating that it is unable to meet some of WBC unmet need is unfounded and demonstrates that the plan has failed to be positively prepared. <p>Does not seek to 'promote sustainable patterns of development' as required by the NPPF and does not incorporate sufficient flexibility through the review of the Green Belt to satisfy that the Green Belt boundary will not need to be altered.</p>	<p>Ability to meet a proportion of Woking's unmet need is discussed in the Housing Delivery Topic Paper.</p> <p>The reasoning behind not safeguarding land for potential future development is explained in the Green Belt and Countryside Topic Paper.</p>
<p><i>Guildford BC's approach to education planning unsound:</i></p> <ul style="list-style-type: none"> Failed to positively plan for education needs, including the needs of existing schools – plan does not undertake proper analysis of the timing of requirements or a proper matching of the location and nature of demand for places. 	<p>The Council have worked closely with SCC as the education authority in assessing need arising from the planned growth and the educational provision needed to satisfy it. This evidence has been made available as part of the submission evidence base.</p>
<p><i>Biodiversity:</i></p> <ul style="list-style-type: none"> There will be a significant <u>net loss of Biodiversity</u> if this Plan goes ahead in full. The Spatial Vision states "Over 250ha, equivalent to more than 350 football pitches, will be provided in perpetuity for the use of residents and visitors. This space will also support and improve the borough's biodiversity". This is disingenuous. The council plans to use 467ha of land that is either farmland or other green space for building. Against this it is creating 249.8ha of mixed-use Suitable Alternative Greenspace (SANG) <u>a net loss 218.2 ha</u> of fields and other green space. 	<p>Minimal but unavoidable loss of biodiversity due to selecting sites with lower biodiversity value, and offsetting their development impacts with SANGs and other forms of open space.</p> <p>This approach would not lead to a significant net loss of wildlife. It has been found to be necessary to develop on greenfield sites to provide sufficient land to meet housing requirement and to promote sustainable patterns of development. The sites chosen have been those of generally low biodiversity value (not designated sites) and all planning applications will be required to minimise impacts on biodiversity and where possible provide net gains on site. Where developments support SANGs, this will provide further improvements to biodiversity off-site.</p>

	<p>Through Policy ID4, biodiversity measures, either on development sites, on SANGs or on other forms of open space, will be targeted at the priority species and habitats identified in the Surrey Nature Partnership's Biodiversity Opportunity Areas evidence base, ensuring that biodiversity measures achieve "best value" in order to deliver net gains where possible. This approach also accords with the emerging Natural Capital work being produced by the Surrey Nature Partnership, which will eventually provide a scientific and quantifiable approach to measuring and delivering net gains.</p>
<p><i>Retail study inaccuracies:</i></p> <ul style="list-style-type: none"> Object to the reliance on the Carter Jonas study update 2017 which includes "demand" for retail space from companies already in administration. 	<p>The retailer requirements in Appendix 6 of the 2014 retail study were based on the most up-to-date snapshot of information available at that time and it is possible that some retailers may have closed down since that data was first published. The list of companies in that appendix was not included in the 2017 update as there had not been time to update the list and it was not fundamentally important to do so from the perspective of ensuring that the evidence base was sufficiently up to date.</p>
<p><i>Proposed changes:</i></p> <ul style="list-style-type: none"> There is no explanation in the 2017 local plan document or the Council report as to why the 2016 plan is unsound, the ways in which it is unsound, why the proposed changes would render the plan sound and why they are the best changes to make. WAG of course consider that the plan is unsound. 	<p>The updated draft Local Plan (2017) contained significant changes to the earlier version which reflected consideration of representations received, changes in circumstance and changes to the evidence base. The changes are outlined in the Council report to Full Council on 16 May 2017 'Proposed Submission Local Plan: strategy and sites June 2017'. The current draft Plan is considered to be sound.</p>
<p><i>Spatial vision to meet housing needs at odds with reduction in housing no.:</i></p> <ul style="list-style-type: none"> Spatial Vision (para 2) states that GBC is seeking to meet communities' needs in relation to housing. Yet in the third paragraph, the Vision confirms that the Council has taken the conscious decision to reduce its overall housing requirement for the Plan. This decision is compounded by the fact that it has extended the plan period by a further year to 2034. 	<p>The Local Plan recognises the need in the borough and has sought to address this as appropriate with the significant constraints of the borough.</p>

<p><i>Affordability levels indicate substantial uplift to housing no. needed:</i></p> <ul style="list-style-type: none"> The approach set out in the Addendum report to deal with market signals is appalling. As a starting point it is relevant to note, by the evidence set out in the Addendum report, that the affordability ratio in Guildford Borough is currently 11.5 times average earnings. This is far in excess of the national average, which is approximately 8 times average earnings. Guildford Borough is therefore an inherently unaffordable place to live and by the evidence presented in the Addendum report one of the least affordable places in the Country (outside of London). This alone should dictate a substantial uplift to address affordability across the Plan period. 	<p>The Local Plan recognises the need in the borough and has sought to address this as appropriate with the significant constraints of the borough.</p>
<p><i>Reduction in housing no. makes plan unsound due to unmet need in HMA:</i></p> <ul style="list-style-type: none"> By reducing the housing requirement in the plan to 12,426 new homes the Plan is unsound as the Council have failed to plan positively in relation to meeting the needs of neighbouring authorities. <p>Concerns regarding the Guildford Borough Council's co-operation with its partners in the Housing Market Area.</p> <p>Significant amount of unmet housing needs within Woking and consideration needs to be given within the HMA how this unmet need is going to be addressed.</p> <p>The Housing Topic Paper 2017 does consider the issue of unmet need in relation to the reduced housing requirement. However, its position within this topic paper relates to the Council's consideration as to the relative appropriateness of using specific allocations to address unmet needs from other authorities. In particular the Council focuses on the potential adverse impacts in relation to some allocations. Further deliberation doesn't appear to have been given to the</p>	<p>The Council do not consider that unmet needs within the HMA can be met. The Council do acknowledge that the inspector concluded that Waverley Borough Council could sustainably meet 50% of Woking's unmet need, the same conclusions cannot be drawn from the specific set of circumstances within Guildford. The justification is set out in more detail in the Duty to Cooperate and Housing Delivery Topic Papers.</p> <p>The Council are continuing to cooperate with both Woking and Waverley borough councils in relation to meeting housing need across the HMA. Pursuant to this the Council has signed a Memorandum of Understanding and Statement of Common Ground, which sets out in more detail how the Council propose to continue cooperating on this matter. Further detail is set out in the Duty to Cooperate Topic Paper.</p>

benefits of meeting the wider housing needs of the HMA given the level of need and significant affordability issues identified in the West Surrey SHMA.

There does not appear to be any commitment from Guildford or Waverley with regard to meeting Woking's unmet housing needs. In fact it would appear that GBC are seeking to do the opposite by reducing their own housing requirement. This situation was addressed by the Inspector during of the recent examination in public of the Waverley Local Plan. During the hearing the inspector outlined his concern that there was unmet need within the HMA as a result of Woking being unable to meet their housing needs in full. As a result of this concerns he proposed that half of this unmet need, circa 150 dwellings per annum, be met by Waverley. Whilst recognising that the Guildford Local Plan would be examined separately and it would be for that Inspector to draw their own conclusions he suggested that Guildford adopt a similar approach to take account of Woking's unmet housing need. We would endorse the Inspector's comments and recommend Guildford increase their housing requirement to include a proportion of Woking's unmet needs.

Addendum to SHMA contradicts commitment to work with neighbouring authorities:

- The decision of Guildford Borough Council to prepare an Addendum to the joint West Surrey SHMA (2015) is clearly contrary to the MoU and the commitment to "work jointly". The Addendum Report prepared by Guildford fails to take into account the wider HMA within which both Woking and Waverley Council lie.

The West Surrey SHMA: Guildford Addendum was prepared in cooperation with Waverley and Woking. It is intended to sit alongside and provide a factual update to the West Surrey SHMA.

Paragraph 2a-007 in the PPG outlines that where local plans are at different stages of production; LPAs can build on the evidence of partner authorities in the HMA but should coordinate future reviews. GL Hearn has subsequently prepared a report, which draws together the latest evidence on housing need (OAN) across the three HMA authorities.

Housing no. makes plan unsound, further smaller sites required with uniform trajectory across plan period:

- Revision to the SHMA and the Plan to correct the OAN which should be higher;

Allocation of further smaller sites to address shortfall in provision in the early and middle years of the Plan period arising from the over reliance on a small number of strategic allocations;

Removal of stepped trajectory and replacement with a uniform trajectory across the Plan period.

GL Hearn has responded to substantive challenges made in relation to the robustness of the SHMA. This is included in as an appendix to the Housing Delivery Topic Paper.

The rationale for the proposed spatial strategy is set out in more detail in the Housing Delivery Topic Paper. Whilst strategic sites have longer lead in times, they are also able to provide for a greater level of associated infrastructure. Whilst we have sought to maximise the number of smaller greenfield sites that are less reliant upon the delivery of significant infrastructure, it is not possible using only these to sustainably accommodate the level of growth required to meet our OAN.

The Council considers that there are a number of factors unique to Guildford that justify a phased approach. The justification for this is set out in more detail in the Housing Delivery Topic Paper.

Question 4 – Duty to Co-operate

Main Issue	Guildford Borough Council response
<p><i>Representations from Prescribed Bodies and Selected Stakeholders</i></p>	
<p>Highways England</p> <ul style="list-style-type: none"> A statement of common ground between Highways England, Surrey CC and Guildford BC would be beneficial; and there is and will continue to be a need for collaborative working between these parties; and although this does not remove uncertainties, it could provide reassurance that work will continue up to and beyond the Local Plan adoption. 	<p>The Council agrees that a statement or statements of common ground would be beneficial. We will work with Highways England and Surrey County Council to seek to achieve a statement or statements of common ground.</p>
<ul style="list-style-type: none"> There is significant development proposed in neighbouring councils that will impact upon the infrastructure in Guildford borough. This has not been taken account of in plan preparation. 	<p>The Council have cooperated with neighbouring authorities, particularly Rushmoor, Waverley and Woking borough councils, and Surrey and Hampshire county councils in understanding the impact that the development of the Aldershot Urban Extension and Dunsfold Aerodrome will have on Guildford borough.</p> <p>The Guildford Borough Proposed Submission Local Plan “June 2016”: Strategic Highway Assessment Report (Surrey CC, June 2016) (hereafter the SHAR 2016) accounts for all planned development proposed in Waverley Borough Council’s Draft Local Plan 2016 in the period to 2032, including at Dunsfold Aerodrome, and all transport demand in the rest of the United Kingdom to 2031. The latter is represented using the Department for Transport’s TEMPRO forecasts for full development, including background growth.</p> <p>The impacts of development will be assessed in more detail through the planning application process as and when sites come forward. GBC have also worked closely with Surrey County Council officers to understand the impact of demographic and planned growth on</p>

	<p>schools. The Schools Commissioning Officer (South West) that covers the part of Surrey including Guildford borough works closely with the adjoining Schools Commissioning Officer to ensure that cross boundary development is assessed where catchment areas overlap. The Schools Commissioning Officer has also liaised with colleagues at Hampshire County Council to assess the impacts of development in Rushmoor Borough Council, as some children living in Rushmoor borough attend schools in Guildford borough.</p>
<ul style="list-style-type: none"> There is no discussion in the transport evidence base about the traffic generated by developments Dunsfold Aerodrome or Cranleigh wanting to use Guildford's roads. For example, the A281 is forecast to be far over capacity at Millbrook. Guildford BC is saying, in its views on the Town Centre Master Plan and the Transport Strategy, that it wants to opt for Scenario 2 which means a reduction of 30% in capacity. So what will happen to traffic from Waverley that wants to go to the hospital or University? This does not appear to have been thought about. 	<p>The SHAR 2016 accounts for all planned development proposed in Waverley Borough Council's Draft Local Plan 2016 in the period to 2032, including at Dunsfold Aerodrome.</p> <p>The SHAR 2016 assessed the mitigation provided by key highway schemes from the programme of transport schemes that were considered necessary for the delivery of the Draft Local Plan 2016.</p> <p>Highway schemes identified in the Guildford Town Centre and Hinterland Masterplan Report (Final draft report for consultation, October 2015) were not assessed in the SHAR 2016. The draft masterplan is neither a Development Plan Document nor a Supplementary Planning Document. The document has limited, if any, weight as a material consideration in planning terms.</p> <p>Surrey County Council, the Local Highway Authority, and Guildford Borough Council have, at various points in time, considered options for changes to the gyratory in Guildford town centre since at least the 1990s. At present, there are no preferred or committed proposals, and none are expected to be brought forward in the near future. Therefore, we did not consider that it was appropriate to consider the traffic impacts of such options in the preparation of the Draft Local Plan.</p> <p>The 'Scenario 2' scheme, as identified in the draft masterplan is neither a 'committed' nor an 'anticipated' scheme in the Guildford Borough Transport Strategy 2017 (Guildford Borough Council, 2017).</p>

<p>Surrey Heath BC</p> <ul style="list-style-type: none"> • Objection regarding the removal of Pirbright Barracks and Keogh Barracks from the Green Belt, and the potential cross-boundary implications of doing so. 	<p>GBC have liaised with Surrey Heath in relation to the perceived uncertainty of the future of the land that is now proposed to be inset from the Green Belt at Pirbright Barracks and Keogh Barracks. GBC are not aware of any intentions from the MoD to change the way in which these sites are currently used or for them to relocate from them entirely. This view is substantiated by no reference to either site within the Footprint Strategy.</p> <p>In spite of this, it is worth noting that their proximity to the Thames Basin Heaths Special Protection Area, which results in them being almost entirely within the 400m buffer zone, already places a significant constraint as to the sort of development that could be considered appropriate on the sites. In addition to this, their rural location means that they are not sequentially preferable for other high trip generating uses which might otherwise be appropriate so close to the SPA. We therefore consider that insetting the sites from the Green Belt is unlikely to result in any significant changes to the overall use or impacts of the sites but has potential to help to support their current uses and functioning.</p> <p>Surrey Heath has confirmed their concerns have been addressed by this clarification.</p>
<p>Elmbridge and Woking BC</p> <ul style="list-style-type: none"> • Significant objections raised regarding Wisley planning application. 	<p>These were objections to the planning application. The allocation contains several requirements, which did not form part of the planning application.</p>

Representations on Specific Issues	
<ul style="list-style-type: none"> Should plan for more homes to meet unmet needs from within the housing market area and London 	<p>The NPPF (para 182) requires that unmet requirements from neighbouring requirements should be met “where it is reasonable to do so and consistent with achieving sustainable development”. We do not consider we can meet unmet needs. Further justification is set out within the Housing Delivery Topic Paper.</p> <p>Ongoing work being undertaken by GBC, and neighbouring HMA authorities, in relation to meeting unmet needs is set out in more detail in the Duty to Cooperate Topic Paper.</p>
<ul style="list-style-type: none"> The OAN and housing target has been reduced in spite of unmet needs within the housing market area. The plan should seek to positively meet unmet needs. 	<p>The Council does not consider we can meet unmet needs from within the HMA. The justification is set out in more detail in the Duty to Cooperate and Housing Delivery Topic Papers.</p> <p>The Council are continuing to cooperate with both Woking and Waverley borough councils in relation to meeting housing need across the HMA. Pursuant to this we have signed a Memorandum of Understanding and Statement of Common Ground which sets out in more detail how we propose to continue cooperating on this matter. Further detail is set out in the Duty to Cooperate Topic Paper.</p>
<ul style="list-style-type: none"> Rushmoor should be included within the Housing Market Area given strong linkages that exist 	<p>The West Surrey SHMA does consider the influences on/from Rushmoor. However, there is a stronger set of interactions between Rushmoor, Surrey Heath and Hart. This is also evidenced in their SHMA. There is nevertheless a need for continued joint working.</p>
<ul style="list-style-type: none"> The Guildford Addendum has been prepared for Guildford only. This is not justified when it should be prepared on an HMA basis. 	<p>The West Surrey SHMA: Guildford Addendum was prepared in cooperation with Waverley and Woking. It is intended to sit alongside and provide a factual update to the West Surrey SHMA. It is consistent with the methodology used in the West Surrey SHMA and does not undermine the findings of it.</p> <p>Para 2a-007 in the PPG outlines that where local plans are at different stages of production; LPAs can build on the evidence of partner authorities in the HMA but should coordinate future reviews. GL Hearn has subsequently prepared a report that draws together the latest evidence on housing need (OAN) across the three HMA authorities.</p>

Wider economic area:

- GBC has not explored any joined-up ways of providing employment across the region.

GBC has not explored in detail any joined-up approaches to providing employment land across the region.

The study area for the 2014 ELNA (<http://www.guildford.gov.uk/newlocalplan/CHttpHandler.ashx?id=19966&p=0>) is the borough itself but it also considers the economic situation and growth trends across the FEMA (the property market area). This is a normal way of assessing a local authority's employment needs and opportunities. Planning Practice Policy Guidance (PPG) published in March 2014 recommends a consideration of the wider property market area, also referred to as the Functional Economic Market Area (FEMA), in assessing the employment land needs of a given location (see in particular paragraphs 012 and 030-032 of the guidance). The Council along with Woking and Waverley Borough Councils have worked together and agreed the extent of the West Surrey FEMA (Functional Economic Market Area) which covers the whole geographic area of all three boroughs. This was published in August 2016.

Question 5 – The content of the plan / Representation form

Main issues on the content of the plan are covered in the respective sections.

No main issues on Representation form.

Question 6 / Question 7 – Any other comments

No main issues.

(Comment on soundness of draft Local Plan moved to Question 3 section on Soundness).

Draft

Appendix 11:

Regulation 18 Consultation Statement (2016)

Draft

Guildford borough

Regulation 18

Consultation Statement

June 2016



GUILDFORD
BOROUGH

Alternative formats

If you would like to read this consultation document in a different format such as large print or a different language please contact Planning Policy:
Telephone: 01483 444471
Email: planningpolicy@guildford.gov.uk

Draft

**Local Plan Strategy and Sites
Consultation Statement**

to accompany the Reg 19 pre-submission consultation plan, we must include a consultation statement. This is

“a statement setting out—

- (i) which bodies and persons were invited to make representations under regulation 18,
- (ii) how those bodies and persons were invited to make such representations,
- (iii) a summary of the main issues raised by those representations, and
- (iv) how the main issues have been addressed in the local plan”

Draft

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2. Consultation on Draft Local Plan: strategies and sites Issues and Options document	6
3. Consultation on Draft Local Plan: strategy and sites	8

Appendices

- Appendix 1: List of consultees
- Appendix 2: The representation forms
- Appendix 3: List of acronyms
- Appendix 4: Copies of all representations

Draft

1. Introduction

This consultation statement presents how Guildford Borough Council (GBC) undertook consultation during 2013 and 2014 to inform the Proposed Submission Local Plan: strategy and sites document.

The following document summarises how we consulted , who was invited to make representations, the comments that were received and how we have responded to these in the Proposed Submission Local Plan

GBC undertook two Town and Country Planning (Local Development) (England) Regulations 2012 (Regulation 18) consultations, as detailed below:

- The first consultation was undertaken on the Draft Local Plan: Strategy and Sites (Issues and Options) during October and November 2013 over an eight-week period.
- The second consultation was undertaken on the draft Local Plan: Strategy and Sites between July and September 2014 over a 12.5-week period.

Therefore, in total we have consulted for over 20 weeks and given the community significant opportunities to provide input and comment on the emerging Draft Local Plan. This significantly exceeds the six weeks statutory period stipulated in the Regulations. Over 40,000 comments and just over 12,000 people/organisations inputted into both rounds of consultation.

This statement sets out both consultations, and our response to the comments received during the consultations. It sets out what consultation was undertaken, when, with whom and how it has influenced the new version of the plan (Regulation 19 Proposed Submission Draft Local Plan).

The consultation that forms the basis of this report and has been produced in accordance with Town and Country Planning (Local Development) (England) Regulations 2012 (Regulation 22) (1) (i)-(iii) which state that a Consultation Statement has to be produced to show:

Which bodies and persons GBC invited to make representations under Regulation 18

- How those bodies and persons were invited to make representations under Regulation 18
- A summary of the main issues raised by the representations made pursuant to Regulation 18
- How any representations made pursuant to regulation 18 have been taken into account

The Consultation Statement will assist the Inspector at the Examination in determining whether the borough's Local Plan complies with the requirements for public participation and government guidance.

The report shows that the consultation carried out by the borough has complied with the statutory requirements set out in the Town and Country Planning (Local Development) (England) Regulations 2012 (Regulation 18). The report also shows that public involvement was carried out following the approach set out in GBC's Statement of Community Involvement (SCI). This is contained in our Community Involvement in Planning document (2013).

2: Consultation on Local Plan Strategy and Sites (Issues and Options) document

Consultation on the Local Plan Strategy and Sites (Issues and Options) took place between Tuesday 1 October and Friday 29 November 2013 (an eight week period).

Key Consultation Methods and Analysis

Promotion of the consultation period

The Draft Local Plan (Issues and Options) consultation was promoted through a wide variety of means. The Local Plan website was launched in June 2013 to make information on consultation more accessible. Furthermore, the associated Local Plan documents were made available in hard copy and online.

Public posters and banners were distributed across the borough to raise awareness of the drop-in events, workshops and exhibitions.

An information leaflet was also produced and 10,000 copies distributed at venues across the borough and at consultation events. The leaflet provided a brief description on the Draft Local Plan, this stage of consultation and raised awareness of the consultation events.

Consultation events

The following community engagement events took place during the eight week period in October and November 2013:

- Swan Lane consultation hub in the town centre (open 10am until 4:30pm , Monday to Saturday, with a late night opening until 8pm on Thursdays. Open between 10am and 4pm on Sundays)
- 11 one to one meetings with local stakeholders and community groups;
- drop-in events in eight different locations e.g. Sainsbury's, Burpham and Ripley Farmers' Market ;
- five targeted outreach events e.g. Women on a Wednesday, Guildford College and Surrey University;
- three school workshops and three youth events;
- four workshops across the borough held at St Peter's Centre, Ash and Radisson Blu, and;
- two exhibitions in the west (St Peter's Centre, Ash) and east (East Horsley Village Hall) of Guildford borough.

At the events a copy of the Draft Local Plan and documents were available, the questionnaire was distributed, Guildford Borough Council officers were available for informal discussions and representatives from the consultancy, Soundings were available to facilitate discussions. General and ad-hoc comments could be provided through a number of means including; written on 'canvass cards' placed on the 'wheel of fortune', conversation wall and the aerial view map.

Feedback and the questionnaire

Feedback from the community was sought through a few methods but primarily through questionnaires (available both online on the Draft Local Plan website and in hard copy versions). Comments could be made online via the Councils consultation system, Inovem, which makes submitting comments easy and accessible, allowing people the time to consider what they wanted to say and in their own time.

Questionnaires were also tailored to the youth and distributed at six targeted engagement events

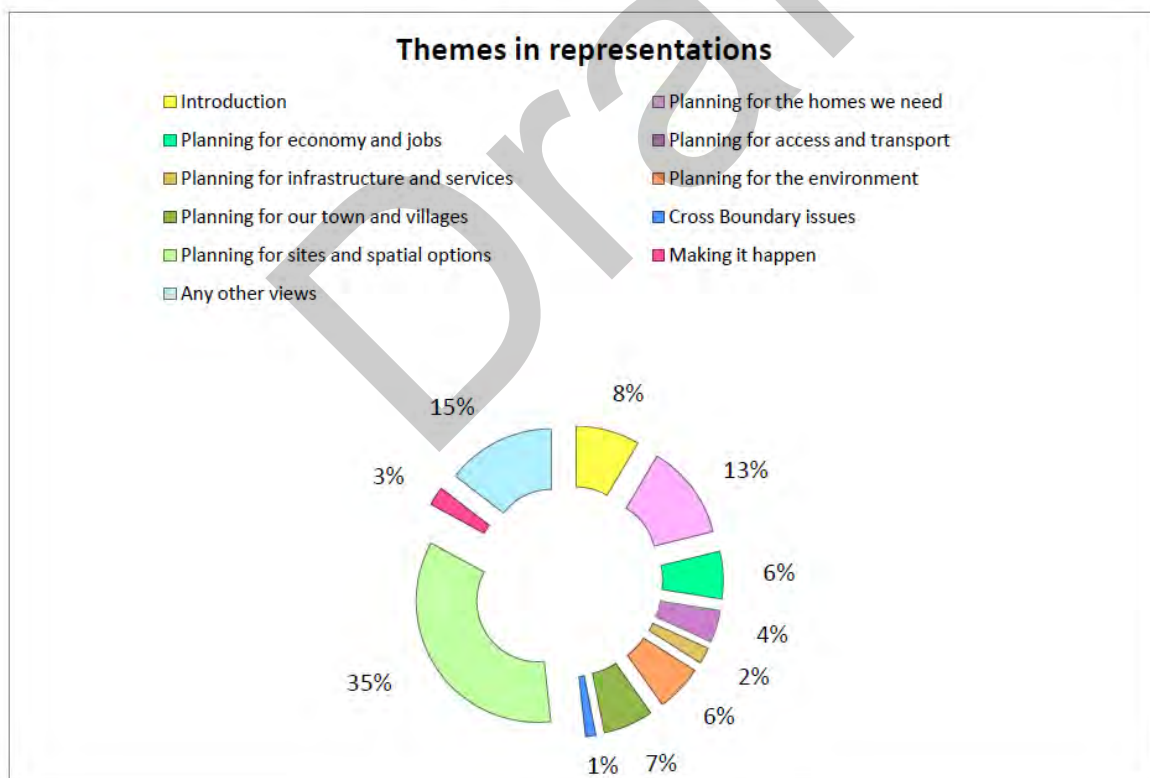
for the youth which took place during the consultation period.

The main questionnaire contained 41 questions (see Appendix 2 for a copy of the Questionnaire).

The questions were grouped around common themes and sought views on;

- the introduction section of the Draft Local Plan ; facts and figures, strengths and weaknesses of the borough, a vision and objectives for the Local Plan;
- planning for the homes we need;
- planning for the economy and jobs;
- planning for access and transport;
- planning for infrastructure and services;
- planning for the environment;
- planning for our towns and villages;
- cross boundary issues i.e. the approach to the duty to cooperate , and;
- planning for sites and spatial options

As a result, of this questionnaire and other feedback mechanisms, over 20,000 comments were received from over 5,000 people or organisations during this round of consultation. As illustrated in the chart below (figure 1) the topic areas most frequently commented on were 35% of comments about planning for sites and spatial options, followed by 15% providing 'any other views' and 13% centred on planning for homes.



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Figure 1 Themes in representation

To review all the main issues raised from the consultation on the Draft Local Plan (Issues and Options) refer to appendix 4.

3. Consultation on Draft Local Plan (Strategy and Sites)

Consultation on the Draft Local Plan (strategy and sites) took place from 1 July to 26 September 2014 (a 12-week period). The consultation period of 12.5 weeks vastly exceeded the six-week period required under the regulations and ensured that 6 weeks were outside of school holidays (3 weeks before and 3 weeks after).

After significant updates to the previous version of the plan in part as a result of comments from the previous consultation in 2013, GBC aimed to achieve in depth and meaningful engagement with the community. An extensive consultation schedule was developed, which included an active publicity and media campaign, a variety of events across the borough and focussed stakeholder workshops. In addition to this, we provided full time access to the Planning Policy team officers, six days a week (Monday to Saturday) between 10am and 4pm throughout the consultation period to discuss the Draft Local Plan in Guildford town centre, in the Swan Lane Local Plan 'drop-in' consultation hub.

Promotion of the consultation period:

Whilst the primary method of promotion of the consultation period were emails, local newspaper adverts, posters and the website, we also used a variety of other methods (building on those used in the previous consultation period) which included:

- local radio;
- mass-mail out;
- public display boards Guildford Railway Station and in Council Offices;
- High Street banner;
- displays on refuse trucks, taxis and buses;
- adverts on the Council website;
- media briefings and interviews;
- promotion via social media (Facebook, Twitter and Pinterest);
- posters in community areas (post offices, libraries, GP surgeries and Child Care Centres), and;
- internal Council communications to officers and elected members.

Consultation events:

Throughout the consultation we applied a flexible approach to make sure that as many people as possible could get involved, this included holding events at different times of the day, over weekend and bank holidays and in many different locations. Approximately 40 events were held with the local community and other stakeholders (refer to map below figure 2).

Event	Recorded attendees
1. Swan Lane consultation hub	1,600+
2. Five pop-ups	324
3. Nine public exhibition	441
4. Five outreach events	153
5. Eight targeted meetings	47
6. Five workshops	78
Total attendees	2,643

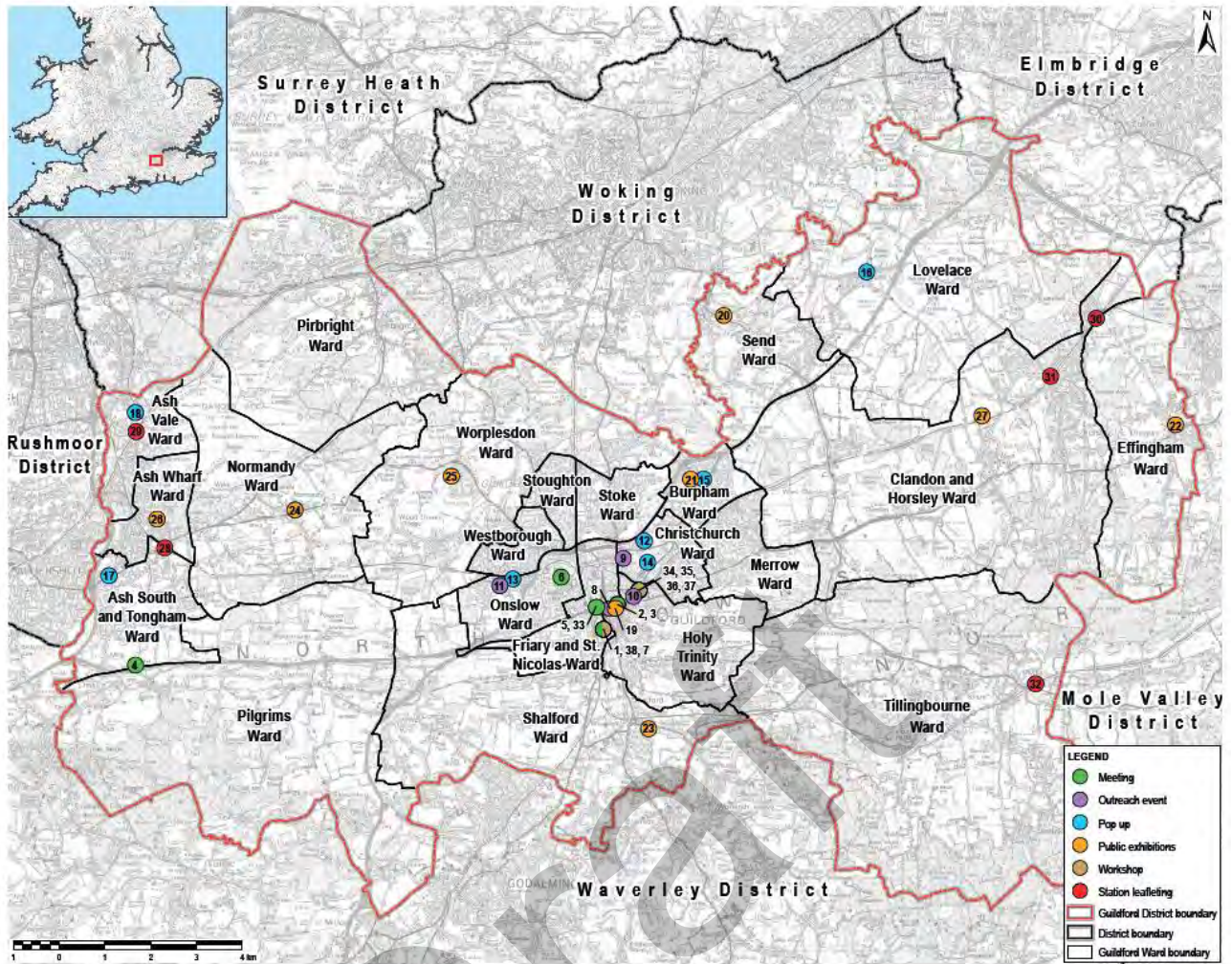


Figure 2 Distribution of events across Guildford Borough

Events took place across the borough as illustrated in the map (figure 2). As seen on the map the events were evenly distributed east to west, with a higher concentration in the more central location of Guildford urban core which served to be more accessible for events such as the workshops.

Feedback and the questionnaire

The questionnaire was available online (on the Inovem system) and in hard-copy.

Over 20,000 comments from over 7,000 individuals, organisations and stakeholders were received during this consultation period.

Options for providing feedback	
Online consultation system- Inovem	<p>The online system also allowed people to save their response and add or review it at a later stage. By adding their details people also had the option of registering for notifications on other consultations.</p> <p>You can access the portal here: https://getinvolved.guildford.gov.uk</p> <p>Hard copies of questionnaires were available at all events and from the Guildford Council offices to help people structure their responses to the consultation.</p> <p>A youth questionnaire was also distributed.</p> <p>The primary questionnaire consisted of seven questions, including; the evidence base, National Policy and guidance, Sustainability Appraisal and Habitats Regulations Assessment, The vision, the Key Diagram and the content, paragraphs, policies and site allocations.</p>
Email and post	<p>We set up a project postal address and email so people could send their written responses to us.</p>
Comment slips at events	<p>Simple comment slips to capture feedback at the public events. They were unstructured so people could provide any feedback they wanted in writing.</p>

Appendix 1: Local Plan consultees

Specific consultation bodies

- The Coal Authority.
- The Environment Agency.
- English Heritage
- Natural England.
- The Civil Aviation Authority.
- Network Rail Infrastructure Ltd.
- Highways England
- Environment Agency
- Historic England
- Homes and community agency
- Marine Management Organisation
- Thames Water
- Surrey Police
- Albury Parish Council
- Artington Parish Council
- Ash Parish Council
- Basingstoke Canal Authority
- Compton Parish Council
- East Clandon Parish Council
- East Horsley Parish Council
- East Horsley Parish Council
- Effingham Parish Council
- Elmbridge Borough Council
- Enterprise M3
- Environment Agency
- Epsom and Ewell Borough Council
- Guildford Borough Council
- Hampshire County Council
- Albury Parish Council
- Artington Parish Council
- Ash Parish Council
- Basingstoke Canal Authority
- Compton Parish Council
- East Clandon Parish Council
- East Horsley Parish Council
- East Horsley Parish Council
- Effingham Parish Council
- Elmbridge Borough Council
- Enterprise M3
- Epsom and Ewell Borough Council
- Guildford Borough Council
- Hampshire County Council
- Highways England
- Historic England
- Mole Valley District Council
- Normandy Parish Council
- Ockham Parish Council
- Pirbright Parish Council
- Puttenham Parish Council
- Ripley Parish Council
- Royal Mail
- Seale and Sands Parish Council
- Send Parish Council
- Shalford Parish Council
- Shere Parish Council
- South East Water Ltd
- St. Martha Parish Council
- Surrey County Council
- Surrey Heath Borough Council
- Sussex and Surrey Police
- Wanborough Parish Council
- Waverley Borough Council
- West Clandon Parish Council
- West Horsley Parish Council
- Woking Borough Council
- Wokingham Borough Council
- Womersley Parish Council
- Worplesdon Parish Council

General Consultation Bodies

- 4-Get-Me-Nots
- Abbotswood Women in Touch
- Ash Residents Association
- Ashenden Residents Association
- Cobham Conservation and Heritage Trust
- Compton Village Association
- CPRE Surrey Branch & Guildford District
- Diocese of Guildford
- East Guildford Residents Association
- Edwin Road Residents Association
- Fairlands Liddington Hall and Gravetts Lane Community Association
- Guildford Access Group
- Guildford Dragon
- Guildford Environmental Forum
- Guildford society
- St Catherines Assoc.
- Lynx Hill Residents Association
- Guildford Residents association
- Guildford Vision Group
- Roseacre Gardens Residents Assoc.
- Shalford Conservation Society
- St Catherines Village Association
- St. Peters Shared Church
- Surrey Chambers of Commerce
- Surrey Wildlife Trust
- The Clandon Society
- The Guildford Society
- The Ripley Society
- University of Surrey
- Weyfield Residents Association

All other residents, business owners and other stakeholders who have either previously responded to a Local Plan consultation or asked to be notified of future Local Plan consultations, currently this stands at over 13,000 individuals and organisations.

Appendix 2 - The representation forms

Draft



Guildford borough

Local Plan Strategy and Sites Issues and Options

Questionnaire and Monitoring Information



**GUILDFORD
BOROUGH**

Local Plan Strategy and Sites Issues and Options Questionnaire and Monitoring Information

Alternative formats

If you would like this document in a different format such as large print or a different language please contact the Planning Policy Team on **01483 444471** or email us at planningpolicy@guildford.gov.uk

Draft

Questionnaire

Please spare some time to let us know what you think.

We are interested in the views and opinions of all people who live, work or otherwise use the borough.

Please use this questionnaire to let us know your thoughts on the Local Plan Strategy Issues and Options document. The closing date for completed forms is **5:00 pm on 29 November 2013**.

Please complete as much or as little of as you would like. You may decide to concentrate only on the issues you feel strongly about.

Your views are important to us. The more information you provide, the more we will understand the issues that are important to you.

While you are completing this questionnaire you will need to refer to the Issues and Options document. This document can be found at www.guildford.gov.uk/localplanstrategy

Please note that comments cannot be treated as confidential. Your comments will be summarised as part of a public document and made publicly available on the Council's website and we will publish the names of individuals and organisations that responded. We will retain your contact details for future Local Plan consultations, unless you specifically ask us not to. We will not disclose personal information to third parties for marketing purposes.

Help and information

If you need any help or have any questions, please contact the Planning Policy Team on **01483 444471** or by email at planningpolicy@guildford.gov.uk or by post at:

Planning Policy
 Planning Services
 Guildford Borough Council
 Millmead House
 Millmead
 Guildford
 GU2 4BB

Name

Address

.....

Email

Q1

Understanding the borough of GuildfordDo you agree with the summary in **Appendix B**?

If not, can you please explain why?

Q2

Our researchDo you think the research listed in **Appendix C** appropriately covers what we need to know to write the new Local Plan? If not, can you please explain why?

Q3

How do you want the borough to develop?

What are your views on a new vision for the Local Plan and the possible objectives?

Q4

The right mix and density of homes

Which approach to the mix and density of housing do you think is appropriate?

Q5

Affordable homes

Which approach to affordable housing do you think is most appropriate?

Q6

Affordable homes

Would you support an increase in the proportion of affordable housing and the types of developments that are required to contribute towards affordable housing?

Q7

Affordable homes

Which approach to rural exception housing do you think is most appropriate?

Q8

Homes for travellers

Which approach to meeting travellers' accommodation needs do you think is the most appropriate?

Q9

Homes for our ageing population, vulnerable members of our community, students, low paid workers and young working people

Which approaches to meeting the different accommodation needs of our community, including older people, students, low paid workers and young working people do you think is most appropriate?

Q10

Supporting our tourism, arts and cultural facilities

Are there any other issues that you think we should cover in relation to tourism, arts and cultural development - if so what are they?

Q11

Offices, industrial spaces and our rural economy

Which approaches to meeting the existing and new employment needs of our borough, including supporting the economy of the rural areas, do you think are most appropriate?

Q12

Supporting our local centres, our district centres and Guildford town centre

Is this the correct approach to guide the future development of the town centre?

Q13**Supporting our local centres, our district centres and Guildford town centre**

Would you support the proposed approaches to helping support our local centres, district centres and Guildford town centre?

Q14**Balancing development with traffic and congestion**

Are there any other options we can consider to try and help balance development with traffic and congestion?

Q15**Minimising the impact of traffic congestion, promoting alternative ways of moving around and working with our partners**

Which approaches to addressing access and transport issues do you think are most appropriate?

Q16**Infrastructure and services provision**

Are there any other options available to the Council for addressing infrastructure issues?

Q17

Green Belt, countryside, green open spaces and habitats

Which approaches to the Green Belt, countryside and green open spaces do you think are most appropriate?

Q18

Built environment

Which approaches to the built environment do you think are most appropriate?

Q19

Climate change and sustainability

Which approaches to dealing with climate change and sustainability do you think are most appropriate and have we missed anything out?

Q20

Settlement hierarchy

Do you support using the Settlement Hierarchy to help us decide where new development should go or is there other research that we should rely on?

Q21

Villages in the Green Belt

Do you support using the GBCS to help us decide whether we should identify new settlement boundaries for our villages?

Q22

Ash Green

Which option do you think would be the best for the long-term future of Ash Green and its residents?

Q23

Duty to cooperate

Do you agree with this analysis? Are you aware of any other strategic cross boundary issues you think that we should be considering?

Q24

Spatial options

Which of these choices do you think are most appropriate and are there any others we should be considering?

Q25

Guildford, Ash, Tongham, the villages and previously developed land in the countryside

Are you aware of any other land in the existing urban areas of Guildford, Ash and Tongham, within the existing boundaries of our villages or previously developed land in the countryside that could help meet our future needs?

Q26

Land around Ash and Tongham (including countryside)

Do you support using more land surrounding Ash and Tongham to help meet our future needs and is there any other land we should be considering?

Q27

New Green Belt land

Should we alter the Green Belt boundaries to make the changes detailed?

Q28

Land surrounding Guildford urban area

Do you think that we should develop this land to help meet our future needs or are there other more suitable sites?

Q29**Land surrounding villages**

Do you think that we should develop this land to help meet our future needs or are there other more suitable sites?

Q30**Land surrounding villages**

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

Q31**Significant expansion of existing villages**

Do you think we should do more work to assess potential development areas such as those outlined in the Issues and Options document and is there any other land we should be considering?

Q32**A new settlement**

Do you think we should do more work to assess a potential development area, large enough to be a new settlement, at the former Wisley airfield and / or elsewhere?

Q33

Land for Park and Ride sites

Do you support a new Park and Ride in the Worplesdon area or is there other land we should be considering?

Q34

Suitable Alternative Natural Green space (SANG)

Do you know of any potential SANG in the borough and can you suggest a location for a small car park for Effingham Common SANG?

Q35

Land for burials and cremations

Do you support the use of this land to help meet our future burial and cremation needs or is there other land we should be considering?

Q36

Allotments

Do you support the use of this land to help meet our future allotment needs or is there other land we should be considering?

Q37**Open space**

Do you know of any more land that we should consider for open space to help meet future needs?

Q38**Making it happen**

Do you think there are other issues we should be looking at as part of the Local Plan Strategy and Sites document?

Q39**Detailed policies**

Do you think there are other issues we should be looking at as part of the Local Plan Development Control Policies document?

Q40**Implementation and monitoring**

Do you have comments on the delivery information, including the future work to develop our CIL?

Q41

Any other views?

Do you have any other comments or suggestions you wish to make on matters not covered by other questions this consultation?

Draft

Monitoring information

Tell us about you so we can help everyone...

We are committed to ensuring that our services are provided fairly and are accessible to those who need them.

To help us meet this commitment we would like you to complete an equality and diversity monitoring form. The information on the form provides a picture of who contacts us. It helps us to understand who may find it difficult to get involved in consultations, and enables us to make positive changes to make it easier for them to do so.

Some questions on the monitoring form may feel personal, but the information we collect is anonymous, and it cannot be traced back to you. This section of the questionnaire will be detached from your response and will be used for monitoring purposes only. If you would like to know how we use this information, please contact us.

Please answer the questions below by ticking the boxes that you feel most describes you. If you do not want to answer a specific question then please leave it blank.

If you have any questions about this form or how your information will be handled please contact the Planning Policy Team on **01483 444471** or by email at planningpolicy@guildford.gov.uk or by post at:

Planning Policy
Planning Services
Guildford Borough Council
Millmead House
Millmead
Guildford
GU2 4BB

Q1 Gender identity	
At birth, were you described as:	
<input type="checkbox"/>	Male
<input type="checkbox"/>	Female
<input type="checkbox"/>	Other e.g. intersex
<input type="checkbox"/>	I prefer not to say
Which of the following describes how you think of yourself?	
<input type="checkbox"/>	Male
<input type="checkbox"/>	Female
In another way...	
<input type="text"/>	

Q2 Age			
Please select the relevant box:			
<input type="checkbox"/>	16 - 24	<input type="checkbox"/>	45 - 54
<input type="checkbox"/>	25 - 34	<input type="checkbox"/>	55 - 64
<input type="checkbox"/>	35 - 44	<input type="checkbox"/>	65 or over

Q3 Ethnicity			
White			
<input type="checkbox"/>	British	<input type="checkbox"/>	Irish
Other European (please state)			
<input type="text"/>			
Other white background (please state)			
<input type="text"/>			

Asian or Asian British			
<input type="checkbox"/>	Indian	<input type="checkbox"/>	Pakistani
<input type="checkbox"/>	Bangladeshi	<input type="checkbox"/>	Chinese
Other Asian background (please state)			
<input type="text"/>			
Other Ethnic Group			
<input type="checkbox"/>	Gypsy / Traveller	<input type="checkbox"/>	Arab
Other ethnic group (please state)			
<input type="text"/>			
Mixed			
<input type="checkbox"/>	White and Black Caribbean		
<input type="checkbox"/>	White and Black African		
<input type="checkbox"/>	White and Asian		
Other mixed background (please state)			
<input type="text"/>			
Black / African / Caribbean or Black British			
<input type="checkbox"/>	Caribbean		
<input type="checkbox"/>	African		
Other Black background (please state)			
<input type="text"/>			
Language preference			
<input type="checkbox"/>	English		
Other (please state)			
<input type="text"/>			
<input type="checkbox"/>	British Sign Language		

Q4 Disability	
The Equality Act 2010 states that a person has a disability if he or she “has a physical or mental impairment that has a substantial and long-term adverse effect on his or her ability to carry out normal day-to-day activities”	
Do you consider yourself to have a disability as defined by the Equality Act 2010?	
<input type="checkbox"/>	Yes
<input type="checkbox"/>	No

Q5 Sexual orientation	
Do you consider yourself to be?	
<input type="checkbox"/>	Bi-sexual
<input type="checkbox"/>	Gay man
<input type="checkbox"/>	Straight / heterosexual
<input type="checkbox"/>	Lesbian / gay woman
Other (please say if you wish)	
<input type="text"/>	

Q6 Marital status	
Are you:	
<input type="checkbox"/>	Married
<input type="checkbox"/>	In a civil partnership
<input type="checkbox"/>	Not married

Q7 Caring responsibilities	
Please tell us about your childcare responsibilities:	
<input type="checkbox"/>	Children under 11
<input type="checkbox"/>	Children 11 - 18
Do you provide regular and substantial care for:	
<input type="checkbox"/>	Relative (such as disabled child, partner, parent)
<input type="checkbox"/>	Another person (please state)
<input type="text"/>	

Draft

Internal use only

Comment ID:

Name of respondent

Draft Guildford borough Local Plan: strategy and sites

Summer 2014



Consultation questionnaire

We are inviting you to take part in the consultation on the draft Guildford borough Local Plan: strategy and sites. This document sets out the vision for the borough and the approach to development between now and 2031.

The 12 week consultation period will run from **1 July to 5pm on 22 September 2014**.

When adopted the plan will play an important role in shaping Guildford's future – how our towns and villages develop, protecting and enhancing our natural environment, developing our local economy, improving leisure and visitor facilities and supporting more sustainable forms of travel.

In autumn 2013, we consulted on the Guildford borough Local Plan Strategy and Sites Issues and Options and had a great response. Over 5,000 organisations and individuals made comments. These comments helped us to identify what is important to address for the borough's future and, alongside an extensive evidence base, have been used to prepare the draft Guildford borough Local Plan: strategy and sites document on which we are now consulting. Comments received during this consultation will, once again, feed into the plan making process.

The draft Local Plan has a range of policies and site allocations that are proposed to be taken forward. You may comment on as many policies, site allocations and other aspects of the document as you wish. You will need to refer to the draft Guildford borough Local Plan: strategy and sites document whilst you are completing the questionnaire.

The Council wishes to encourage as many people to respond as possible - please inform your neighbours, colleagues or other contacts about this consultation and get them to be part of the plan.

All questionnaires and comments must be received by 5pm on 22 September 2014 and we will only accept comments on the draft Local Plan in a written format.

Part A: Your contact details

Data Protection

The information you provide will be processed in accordance with the Data Protection Act 1998. Information from the questionnaire will be stored on a computer database used solely in connection with the Guildford borough Local Plan consultation and engagement process. As we are required to make all representations available for public inspection, representations cannot be treated as confidential. All representations will be retained in full by Guildford Borough Council and will be available for public viewing at the Guildford Borough Council offices at Millmead. A respondent's address, postcode, telephone numbers, email addresses and signatures will remain confidential.

Copies can be made of the questionnaire if you require more space, or you can simply continue on other sheets of paper, making clear which policy, proposal, paragraph, section or site allocation you are referring to.

Personal Details

Title	<input type="text"/>
First name	<input type="text"/>
Last name	<input type="text"/>
Organisation (if applicable)	<input type="text"/>
Address	<input type="text"/>
Postcode	<input type="text"/>
Telephone	<input type="text"/>
Email address	<input type="text"/>
Preferred method of contact	<input type="text"/>

Agent's details (if applicable)

<input type="text"/>
<input type="text"/>
<input type="text"/>
<input type="text"/>
<input type="text"/>
<input type="text"/>
<input type="text"/>
<input type="text"/>
<input type="text"/>

You can let us know your views in several ways

Please comment on the plan in any of the following ways:

Online questionnaire

<https://getinvolved.guildford.gov.uk>

Paper questionnaire

Paper copies of the questionnaire can be obtained at

- any of the borough's public libraries
- Guildford Borough Council's offices at Millmead
- 25 Swan Lane, Guildford
- from one of our events that are happening across the borough throughout the consultation period (see the guildfordlocalplan.info website for details).

Copies can also be posted to you - please contact us by email or post.

The questionnaire can also be downloaded from www.guildfordlocalplan.info

Completed paper questionnaires should be returned by post to:

Local Plan Consultation 2014
Planning Policy
Guildford Borough Council
Millmead House
Guildford
Surrey, GU2 4BB

Write to us

by email: localplan@guildford.gov.uk
or by post to the address above.

Questions about procedure

Question 1: The evidence base

All Local Authorities should prepare a Local Plan for their areas. The draft Local Plan: strategy and sites document sets out how we can direct and manage development across the borough up to 2031, making provision for homes and employment and environmental assets. It is based on up-to-date evidence. Evidence contributing to the preparation of the draft Local Plan: strategy and sites, is listed in Appendix C.

Do you agree that the evidence used for the draft Local Plan: strategy and sites is adequate, up-to-date and relevant?

Yes No

Comments

Question 2: National policy and guidance

Local Plans are required to be in line with the National Planning Policy Framework (NPPF) and the National Planning Policy Guidance (NPPG).

To the best of your knowledge, do you think that the draft Local Plan: strategy and sites is consistent with national policy and guidance?

Yes No

Comments

Question 3: Sustainability Appraisal and Habitats Regulations Assessment

As part of the preparation of the draft Local Plan: strategy and sites, we carried out a Sustainability Appraisal and Habitats Regulations Assessment which considered the likely significant effects that the draft Local Plan: strategy and sites may have on environmental, economic and social factors in the borough, including European Designated Habitats.

Having looked at the Sustainability Appraisal and Habitats Regulations Assessment do you agree with:

a) the Sustainability Appraisal of the draft Local Plan: strategy and sites?

Yes No

Comments

b) the Habitats Regulations Appraisal of the draft Local Plan: strategy and sites?

Yes No

Comments

Questions about the document

Question 4: The vision

The draft Local Plan: strategy and sites vision statement should be both aspirational and achievable and set out the kind of borough we will strive to become by 2031. It should also identify objectives that we will meet in order to achieve the vision. The vision for the draft Local Plan has been developed from a range of locally specific strategies and through consultations and feedback from stakeholders.

a) Do you think the vision of the draft Local Plan: strategy and sites depicts the borough that communities would want to be living and working in by 2031?

Yes No

Comments

b) Do you think the ambitions, issues and strategic objectives of the draft Local Plan: strategy and sites are representative of the issues the borough faces and the things that we will need to achieve to meet our vision for 2031?

Yes No

Comments

c) Is there anything you think should be included?

Yes No

Comments

Question 5: The Key Diagram

The Key Diagram is a representation of the draft Local Plan: strategy and sites. It provides a broad indication of how the borough will develop over the lifetime of the plan.

a) Do you think that the Key Diagram is representative of the key aspects of the draft Local Plan: strategy and sites?

Yes No

Comments

b) Is there anything missing or is there a way to make the Key Diagram clearer?

Yes No

Comments

Please note: The Key Diagram is not intended to identify specific sites or street names which can be seen on the individual settlement maps in Appendix G.

Question 6: The content - paragraphs, policies and site allocations

Which paragraph, policy or site allocation of the draft Local Plan: strategy and sites document do you wish to make comment on and do you wish to support or object and/or comment?

A separate response should be completed for each individual paragraph/policy/site you are making comment on. Please state your comments fully and clearly and your reasons for supporting/objection to this paragraph/policy/site.

Please indicate what changes i.e. wording, alternative site/boundary, you feel should be made.

Paragraph number/Policy number/Site allocation number or any other aspect:

Support Object

Comments

Question 7: Any other comments

Do you have any other comments that have not been covered by the previous questions?

Yes No

Comments

Draft Guildford borough Local Plan: strategy and sites

Summer 2014



Consultation monitoring form

Please answer the questions by ticking the boxes that you feel best describe you. If you do not want to answer a specific question then please leave it blank. We will use it for monitoring purposes only, to help us understand which groups find it difficult to get involved in consultations. This will enable us to improve the way we do consultations in the future. We will separate this form from your comments.

Question 1 Your age

- Under 16 16 - 24 25 - 34 35 - 44 45 - 54 55 - 64 65 or over
- I prefer not to say

Question 2 Your gender

- Male Female I prefer not to say

Question 3 If you live in the borough, which settlement do you live in?

Question 4 Your ethnicity

Tick one box and add details below if necessary

White

- English/ Welsh/ Scottish/ Northern Irish/ British
- Irish
- Traveller (including Gypsy, Roma or Irish Traveller)
- Other White

Asian or Asian British

- Bangladeshi
- Indian
- Pakistani
- Other Asian
- White and Asian
- White and Black African
- White and Black Caribbean
- Other Mixed

Black or Black British

- African
- Caribbean
- Other Black

Other backgrounds

- Chinese
- Arab
- Any other background, please write
-
- I prefer not to say

Question 5 Disability

The Equality Act 2010 states that a person has a disability if he or she “has a physical or mental impairment that has a substantial and long-term adverse effect on his or her ability to carry out normal day-to-day activities”.

Do you consider yourself to have a disability as defined by the Equality Act 2010?

Yes No I prefer not to say

Other (please say if you wish)

Question 6 Dependents

Do you have any dependents:

Yes No

What is the age of your dependent(s)? (Tick all that apply if more than 1 dependent)

Under 5 5-10 11-15 16 - 24 25 - 34 35 - 44

45 - 54 55 - 64 64 or over I prefer not to say

If you have any questions about this form or how your information will be handled please contact the Planning Policy Team.

Telephone: 01483 444471

Email: localplan@guildford.gov.uk

Post :
Local Plan Consultation 2014
Planning Policy Planning
Services Guildford
Borough Council Millmead
House
Guildford
Surrey, GU2 4BB

Appendix 3

List of Acronyms

AGLV – Area of Great Landscape Value

AONB – Area of Outstanding Natural Beauty

B1a – office land use class

B1b – Research and Development land use class

B1c – light industry land use class

B2 – General industrial land use

B8 – Storage and distribution land use

BOA- Biodiversity Opportunity Area

CIL – Community Infrastructure Levy

DfT – Department for Transport

DLP – Draft Local Plan

DPD – Development Plan Document

DTC – Duty to Cooperate

EIP – Examination in public

ELA – Employment Land Assessment

ELNA – Employment Land Needs Assessment

EqIA – Equalities Impact Assessment

FEMA – Functional Economic Market Area

GBC – Guildford Borough Council

GBCS – Green Belt and Countryside Study

GP – General Practice

HA- Housing Association

HCA – Homes and Community Agency

HMO – Houses in multiple occupation

HRA – Habitat Regulations Assessment

IDP – Infrastructure Development Plan

LAA- Land Availability Assessment

LCA – Landscape Character Assessment

LEP – Local Enterprise Partnership

LRN – Local Road Network

NE – Natural England

NPPF - National Planning Policy Framework

NPPG – National Planning Practice Guidance

OAN – Objectively assessed need

OGSTAR- Options Growth Scenarios Transport Assessment Report

ONS – Office for National Statistics

PMA – Property Market Area

R+D – Research and Development

SA – Sustainability Appraisal

SACs – Special Areas of Conservation

SAMM - Strategic Access Management and Monitoring

SANG – Suitable Alternative Natural Greenspace

SCC – Surrey County Council

SEA – Strategic Environmental Assessment

SHLAA- Strategic Housing Land Availability Assessment

SHMA – Strategic Housing Market Assessment

SNCI – Site of Natural Conservation Importance

SPD - Supplementary Planning Document

SRN- Strategic Road Network

SSSI – Site of special scientific interest

SuDS- Sustainable Drainage Systems

Appendix 4a: Comments on Draft Local Plan issues and options

1. Comments on the Introduction Chapter

Issues	Guildford Borough Council Response
The information provided was too limited in scope and contradictory in places.	This is a summary of a number of various issues without an overarching strategy so there may be some apparent contradiction that goes away when more detailed examination of different issues takes place.
The analysis of strengths and weaknesses did not feature strongly enough the link between the quality of life and landscapes and the economic success of the borough.	It is important that we have a good understanding of the borough including its strengths and weaknesses. It is acknowledged that there is a link between the quality of life and landscapes and the economic success of the borough. It is the role of the Local Plan to balance the competing demands of protecting and enhancing our environment and the accommodation our objectively assessed housing need.
A number of respondents were of the opinion that Guildford is relatively affordable because it is cheaper than London	Whilst Guildford may be cheaper than London in terms of house prices, affordability is still an issue for many residents of the borough and many of the workers especially those in lower paid jobs who cannot afford housing in the borough. This is why the issue of affordability must be considered within the Guildford context as we need to provide adequate housing for our residents and workers.
The River Wey represents a significant strength for the town centre and this is currently under exploited	It is recognised that the River Wey represents a considerable opportunity to improve the environment of the Town Centre and that its leisure and cultural capital should be taken advantage of. Issues relating to the treatment of the River Wey will be dealt with via the Town Centre Vision and subsequent Town Centre Supplementary Planning Document.
There was significant concern that the Evidence Base was not consulted on and that there were flaws with some of the documents most notably the Green Belt and Countryside Study.	The Evidence Base has been prepared in part by technical experts and by the Planning Policy Team in conformity with current guidance and best practice. Whilst the Evidence Base studies have not been available for consultation they have been made available for examination and the conclusions drawn from them can and have been questioned. The Joint Scrutiny Committee has taken a particular interest in the Evidence Base and considered a reappraisal including public involvement, particularly with regard to the Green Belt and Countryside Study. Work has been commissioned to look at issues raised by the consultation and subsequent engagement process.
The information presented was biased and that there was a hidden pro-development agenda	There is no bias in the information presented as it is factual. There is no hidden pro development agenda but the Local Plan is being produced in line with the guidance in the National Planning Policy Framework that states that there should be a presumption in favour of sustainable development

There was a great deal of feeling about the Green Belt with substantial objection to the loss of Green Belt for housing or other uses.	We appreciate the strength of feeling about the Green Belt but that until the housing number is determined it is not possible to be absolute that no Green Belt will be required to accommodate our identified levels of development including the need for homes, jobs and infrastructure.
There was a strongly expressed preference for the use of brownfield sites rather than greenfield/Green Belt sites with a number of representations expressing the opinion that there was no need for any Green Belt releases as sufficient capacity existed in the urban areas to accommodate the need from the borough.	The preference for the use of brownfield sites is in the main the more sustainable choice for development but that until the housing number is determined it is not possible to say that brownfield land will be capable of accommodating all of the identified level of need for development
There was a large degree of objection to the need to provide housing for in migrants to the borough with commentary suggesting that housing provision should only be made for existing residents	Guidance is clear that we must allow for migration to the borough. A zero net migration model is not a true reflection of reality and adopting such an approach would lead to an unsound plan.
It is difficult to comment on the Issues and Options in the absence of a housing number	It is appreciated that the lack of an adopted housing number makes it difficult to come to some judgements about the issues and options outlined but that it was considered important to embark on public consultation at the earliest possible point in time
Existing infrastructure capacity represents a significant weakness	We are aware of the significant issues relating to infrastructure capacity but the Local Plan needs to look at what infrastructure is required to support the level of development in the plan and not to make good deficiencies in existing provision. The Local Plan will be accompanied by an Infrastructure Delivery Plan that sets out what infrastructure is required, where it will be located, who will provide it and who will pay for it.
There needs to be a clear and coherent vision for the future development of the borough.	The Local Plan will provide a clear and coherent vision for the future development of the borough when it is finalised. At the present time the plan is in its initial stages of production

2. Planning for the homes we need

Issue	Guildford Borough Council response
The vision needs to give the same level of protection to the Area of Great Landscape Value (AGLV) as other designations such as Area of Outstanding Natural Beauty and Green Belt.	The NPPF says distinctions should be made between the hierarchy of international, national and locally designated sites so that protection is commensurate with their status. AGLV is a local designation and we will consider how we will take protection of this area forward. We will not be able to give AGLV the same status as national or international designations.

Density of new development should be decided on a case by case basis according to the character of the area	Whilst it is not appropriate to set a blanket density across the borough there should be some parameters to ensure that the best and most efficient use is made of land. Determination of planning applications will be according to the development control policies in part two of the Local Plan and these will take into account the impact on the character of the surrounding area.
Density above 300 dwellings per annum would be unsustainable	300 dwellings per annum would not meet our objectively assessed need for development and therefore adoption of such a low target would lead to an unsound Local Plan. The Evidence Base does not support a target of 300 dwellings per annum.
Density should be increased in the urban areas to avoid the use of Green Belt	Increasing density in the urban area would help towards the efficient and effective use of land but consideration must be given to the impacts of increasing density in the urban area especially with regard to congestion and impact on the character and appearance of the area. Increasing density in the urban area does not automatically mean no Green Belt will be needed for development
There is a need for more 2 and 3 bedroom houses	The Strategic Housing Market Assessment (SHMA) will look at the mix of housing that is required to meet our identified level of need. Informed by our housing needs survey work this will suggest whether more 2 and 3 bedroom houses are needed. We will then use this as guidance for suggesting an appropriate policy approach to this issue.
There is a need for more housing suitable for elderly people downsizing	The Strategic Housing Market Assessment (SHMA) will look at the mix of housing that is required to meet our identified level of need. Informed by our housing needs survey work this will suggest whether more housing suitable for people downsizing is required. We will then use this as guidance for suggesting an appropriate policy approach to this issue.
More affordable housing is needed	We have assessed our affordable housing need via the 2009 SHMA that is currently being updated. The 2009 SHMA indicated that our affordable housing need is in excess of 1,000 dwellings per annum but in order to provide for balanced and mixed communities and in the interests of the overall viability of schemes we have currently adopted a policy that looks to achieve at least 35 per cent provision.
Less affordable housing is needed	We have assessed our affordable housing need via the 2009 SHMA, which is currently being updated. The 2009 SHMA indicated that our affordable housing need is in excess of 1,000 dwellings per annum but in order to provide for balanced and mixed communities and in the interests of the overall viability of schemes we have currently adopted a policy that looks to achieve at least 35 per cent provision.
Housing cannot be affordable given prices in the borough	We are aware of the issues relating to affordability and this is a reason why more affordable housing is needed in the borough. The provision of affordable homes will enable people on lower incomes to live in the borough. A variety of housing is required in order to provide for balanced and mixed communities.

In the absence of an identified housing number it is premature to talk about new settlements	We need to explore all options available to meet our identified need including the provision of new settlements however, no decisions have yet been taken on the level or location of housing to be provided. New settlements remain in contention for consideration.
Local need should be the priority not accommodating overspill from London	We do not have powers to limit in migration to the borough from London or any other destination of origin. Anyone is entitled to buy a house in the borough. Affordable housing is, in the main, allocated in the borough to people with a local connection
Protection should be given to the maintenance of a stock of small houses	The SHMA will look at what is an appropriate mix of housing to meet our identified need. This will be used to guide what protection could be given to the maintenance of existing stock.
What is meant by affordable housing and how can you quantify actual need as opposed to desire	We have adopted the definition of Affordable Housing from the National Planning Policy Framework that states that this is social rented, affordable rented and intermediate housing provided to eligible households whose needs are not met by the market. We are required to assess need and this is what the Strategic Housing Market Assessment as well as the Housing Needs Surveys look at. Our studies are carried out in conformity with national policy and guidance
There is a need to ensure that affordable housing remains so in perpetuity	We generally secure affordable housing through use of a planning obligation, to be retained as affordable housing, or for the subsidy (if there is one) to be recycled to help provide other affordable housing. Affordable housing in the rural settlements (except for East Horsley and Send) is exempt from the rights to buy and acquire, but in all other parts of the borough (ie. the two towns and East Horsley and Send) the sale of affordable housing on the open market is permitted subject to certain conditions. Where we can protect affordable housing from being "lost" to the open market, we will use planning obligations to aim to do so.
Students should be required to live on campus so freeing up affordable housing for the community	Whilst we cannot insist that students live on campus we are doing all that we can to encourage the University of Surrey to increase the amount of student accommodation on campus. However, it does not necessarily follow that building more student accommodation will free up affordable housing for the open market.
The threshold for providing affordable housing should be as low as possible/high was possible/there should be no threshold at all	We recognise that the provision of affordable housing may impact on the viability of schemes but in order to secure some provision a threshold is an appropriate policy tool. We are looking at what the threshold should be and what level of provision should be required but these decisions will need to be based on robust and defensible evidence.
More use should be made of empty homes	We are currently working to bring long term empty homes back into use through our Empty Homes Strategy although there is limited action that the Local Plan can take

Rural exception housing has been abused	Rural housing is made available for people with local connections, and that sites are provided according to strict criteria. We are doing all we can to ensure that the rural exception housing policy is properly applied but in parts of the borough we are unable to prevent the onward sale of affordable housing to the open market.
There should be no rural exception housing on Green Belt	Such housing is provided on sites not normally considered for housing and in this borough that is Green Belt given that the borough is 89 per cent Green Belt. It is therefore generally not possible to provide rural exceptions sites anywhere except for on the Green Belt.
Traveller accommodation is not needed	We have a duty to assess the current and future needs of travellers residing in or resorting to Guildford and make appropriate provision in line with our assessment. Our responsibilities in this are set out in the Housing Act 2004 and Planning Policy for Travellers 2012 published by CLG.
Traveller accommodation should be spread evenly across the borough	Accommodation should be provided in the most sustainable manner and this may mean that there isn't an even spread across the borough. Available and deliverable sites for traveller accommodation are not evenly spread across the borough and need should be addressed where it arises.
There should be some/no market housing allowed on affordable housing sites	National guidance in the NPPF requires us to consider allowing a small number of market homes on rural exception sites. Inclusion of any market housing would be at our discretion and would need to be robustly justified.
Existing Council estates should be demolished and rebuilt at much higher densities	Whilst the Council strives to make the most efficient use of land existing Council estates are in the main, fully occupied and not available for redevelopment.

3. Planning for the economy and jobs

Issue	Guildford Borough Council Response
What definition of travellers is Guildford Borough Council using?	We use the definition of Travellers enshrined in the national policy guidance that says Travellers are persons of nomadic habit of life whatever their race or origin, including such persons who on grounds of their own or their family's or dependant's education or health needs or old age have ceased to travel temporarily or permanently. Travellers are a recognised ethnic minority protected under race relations legislation.
There should be more support for cultural and arts facilities	We provide financial support to a number of arts and cultural facilities throughout the borough including GLive and the Yvonne Arnaud Theatre. The Council is aiming to develop a tourism strategy that will look at future funding for new and existing facilities.
The important contribution that the environment and landscape makes to tourism should be acknowledged	We do acknowledge the contribution that the environment and landscape makes to the success of tourism in the borough. It is the role of the Local Plan to balance the competing demands of protecting and enhancing the environment and accommodating our identified level of need.
There is a need for a proper art gallery and digital exhibition space in the town	Consideration will be given to the provision of additional arts facilities through the

Issue	Guildford Borough Council Response
centre	Tourism Strategy and via the Town Centre Vision and the Town Centre Supplementary Planning Document (SPD).
There is no need to support culture, arts or tourism as the market will sort this out	Tourism, arts and culture make a valuable contribution to the economy of the town and the Council will continue to offer support as appropriate
There is a need for a dedicated sports ground for Guildford City Football Club	The Council will consider the case for a dedicated sports ground if a suitable site becomes available.
The River Wey could provide a focus for cultural development	The treatment of the River will be dealt with in the Town Centre Vision and subsequent SPD. It is acknowledged that more could be made of the River and proposals coming forward for development in the Town Centre will be expected to contribute to this.
There is a need for dedicated coach parking close to or within the Town Centre	Consideration will be given to the provision of dedicated coach parking through the Town Centre Vision and the subsequent Supplementary Planning Document
There is a need for good business accommodation	The contribution that business tourism makes to the overall success of the borough's economy is acknowledged. Additional business orientated hotels will be encouraged in appropriate locations close to business locations
Dunsfold Aerodrome should be used for business accommodation	Dunsfold Aerodrome is outside of the borough boundaries and we therefore have little ability to influence development on that site. We will continue to cooperate with neighbouring authorities including Waverley over sites such as this.
Rural enterprise should be encouraged	The Local Plan will aim to encourage appropriate scale rural enterprise in appropriate locations taking into account the impact of the character and appearance of the local area.
Bus services need improvement in the rural areas to encourage employment	Whilst we agree that bus services may need improvement in the rural areas to encourage employment, and we would support it, this would currently be outside of the remit of the Local Plan.
Farms should be retained in agricultural use and not used for housing	The role of the Local Plan to balance the competing demands of retaining land in agricultural use and accommodating our assessed level of need
There should be no economic development in the Green Belt	It is the role of the Local Plan to balance the competing demands of the protecting and enhancing the environment and accommodating our level of need for development of all types including economic development
Investment should focus on the knowledge based economy	We acknowledge the contribution that knowledge based industries makes towards the overall success of the Local Plan. The Local Plan will aim to support investment in this sector of the economy.
Provision of high speed broadband would help support jobs	Surrey County Council is rolling out a programme of Superfast broadband and this endeavour is supported by GBC

Issue	Guildford Borough Council Response
Analysis of skills required shows a mismatch between what is needed and what residents have	We are working closely with partners who provide education to ensure that the skills the business community requires are being delivered. This is also an aim of our Economic Strategy.
There is a need for incubator facilities for small businesses in the borough and 'grow on' units for expanding companies	We need to ensure that the amount and type of accommodation available for businesses matches the needs of businesses across the whole of the borough. We have identified a need for some smaller units and more research is being carried out.
There is little need to provide industrial floorspace	The Employment Land Assessment which forms part of the Evidence Base supports the need for industrial floorspace across the borough
Additional office accommodation should only be provided for the existing population	According to the NPPF paragraphs 18 – 20 we cannot restrict provision to that needed only for the existing population. The NPPF requires us to commit to ensuring that the Local Plan does everything it can to support sustainable economic growth. We do not have powers to limit migration and commuting into the borough and therefore need to make provision for need arising in the borough regardless of its origin.
There is a need to make appropriate accommodation available for growing sectors of science, oil and medicine based jobs	We are keen to support local businesses that in turn support our thriving economy. We are looking at the accommodation needs of existing and new employers through the ELA
There are too many empty offices in the town so no new ones should be built	We need to balance carefully planning for future employment. Whilst it is acknowledged that current vacancy rates are high we are recovering from a recession. We are likely to go through an economic cycle over the lifetime of the plan and need to build in an element of flexibility to provide choice for the business community. We must also protect existing major employment sites and retain them in employment use rather than grant planning permission for alternative uses
There is a need to support the rural economy	The rural economy makes an extremely valuable contribution to the overall success of the borough with rural parishes accounting for approximately 25 per cent of all employment in the borough, and 36 per cent of all firms in the borough. Rural wards accounted for almost half of all new jobs created in the borough between 2002 and 2008. We take seriously the need to continue to support the ongoing development of the rural economy
Employment provision should take account of home working	The ELA looks at factors that impact on new job creation and the need for additional floorspace, specifically the impact of off-shoring and home-based working
There is no need for additional employment land unless there is housing to match it	The new Local Plan will set out policies and proposals to guide the future development of Guildford up to 2031. Our new plan will determine the best locations for the development we need. The new Local Plan seeks to achieve sustainable development which includes balancing the provision of new homes and new employment floor space.
The Employment Land Assessment should have been consulted on	The Evidence Base was published for information and not for consultation.

Issue	Guildford Borough Council Response
	Comments have been received on the ELA and other Evidence Base documents. The Joint Scrutiny Committee has reappraised the Evidence Base and the ELA will be updated to ensure that it is as up to date as possible.
The Town Centre should have underground parking	Whilst we acknowledge that underground parking enables more efficient use to be made of land which we would support, economic viability and land stability issues need to be considered
Demand for retail floorspace is lower than stated	The figures we state come from our 2011 Retail and Leisure Study and provide for additional retail floorspace across the whole of the borough over the plan period up to 2031. We will be updating our retail research in line with government recommendations.
Provision for retail floorspace should take account of the impact of the internet	We acknowledge the impact of internet retailing but note that more affluent areas have lower levels of internet retailing. New patterns of commercial practice may lead to the need for different types of retail floorspace such as that needed to support Click and Collect type operations. Retail habits will continue to evolve and although it is anticipated that internet retail activities will increase town centres will continue to act as the hub of the community and will remain a focus for retail activity.
North Street should be redeveloped as soon as possible	The North Street Development site is the key regeneration site in the Town Centre and we are working with our development partners to ensure that this site is able to make a valuable contribution to the ongoing success of the Town Centre and the borough's economy.
There should be a Town Centre Masterplan	We have appointed consultants to help produce a Vision for the Town Centre and this will feed into the production of a Town Centre Supplementary Planning Document. A Town Centre Masterplan cannot make site allocations or prescribe development proposals as this would mean it would become a Local Plan document in competition with the new Local Plan. A Town Centre SPD would serve to plan and co-ordinate overall improvements to the Town Centre and it would be rooted in and consistent with the Local Plan.
Congestion is the biggest issue in the Town Centre	We recognise that congestion is an important issue to consider in relation to the ongoing success of the Town Centre and we will continue to work with our partner agencies such as the Highways Authority and the Highways Agency to produce solutions.
Guildford does not need discount stores	According to government guidance it may be appropriate to support different types of retail stores and it is important that we provide for a range of different choices for consumers
None of the village centres should expand to retain their character	Villages need to be able to grow to retain their vitality and viability as local centres. In some cases, this means that some facilities within the village centre may need to expand and provision may need to be made for additional facilities. Any additional development will be required to respect the character of the village and where appropriate respect the character, appearance and setting of any

Issue	Guildford Borough Council Response
	Conservation Areas.
Why have any designated centres	Government tells us we must include a hierarchy of centres in our plan and that they must have designated boundaries. We have the opportunity in the Local Plan to confirm existing boundaries to alter and amend boundaries
Ripley should/should not be a designated centre	Ripley is proposed to be upgraded to a district centre to reflect the function and role of the centre to the local community
The Town Centre boundary needs adjustment	The Town Centre boundary needs to be adjusted to remove peripheral mainly residential areas, and to include land between the Policy Station and the Cricket Ground on Woodbridge Road, and to include much of Walnut Tree Close and the Riverside Business Centre within the boundary.

4. Planning for access and transport

Issue	Guildford Borough Council Response
Large supermarkets should not be allowed	Large supermarkets in locations which are not ideal and which we would not have planned for are a matter of concern. In the absence of an up to date plan we have to consider planning applications for large supermarkets on their individual merits using national guidance. We will still need additional supermarkets but these will be planned for in the Local Plan.
Development should be focused where the need for travel is minimised	This approach would be in line with the need to promote sustainable patterns of development. The Local Plan will have sustainable development as a central theme.
There should be more and better public transport especially buses	We will continue to work with our partners to encourage the provision of more public transport and improved choice
There should be pedestrian and or cyclist priority	We will look at the opportunities for increased priority for pedestrians and cyclist in the development control policies of the Local Plan as part of the emphasis on sustainable development.
The bus station needs improvement and or relocation	We are looking at the future of the bus station as part of the North Street redevelopment project.
New railway stations should be provided	We will continue to work with our partners to seek the provision of additional facilities that help promote sustainable patterns of development.
There are massive problems with existing infrastructure	The Local Plan acknowledges that there are problems with existing infrastructure but it will look to ensure that additional infrastructure that is required due to new development is provided for alongside that development. The Local Plan cannot make provision for improvements required as these will be dealt with outside of the Local Plan process.

There should be more/ no more park and ride facilities provided	We will continue to work to support the provision of additional facilities that promote sustainable patterns of development. Consideration will be given to the provision of additional facilities where appropriate sites can be provided.
Development should provide mitigation for the impacts of the increase in traffic it provides	An Infrastructure Delivery Plan that sets out the infrastructure that is required, where it should be located and how it will be paid for will accompany the Local Plan.

5. Planning for infrastructure and services

Issue	Guildford Borough Council Response
Parking needs attention	We acknowledge that parking is an issue of concern, and within the Town Centre this will be looked at in the Town Centre Vision and the subsequent Town Centre SPD.
Existing infrastructure cannot cope with current levels of development and therefore cannot cope with any more development.	The Local Plan must be positively prepared and forward looking. We will continue to work with our partners and where appropriate, developers of strategic sites to plan and coordinate the funding and delivery of infrastructure to support planned new development in the Local Plan. The Local Plan cannot deal with issues relating to existing infrastructure which are the responsibility of infrastructure providers such as Surrey County Council acting as the Highways Authority.
Infrastructure needs to be provided in advance of development	Infrastructure cannot be provided in advance of development as development funds the provision of infrastructure. However the Council will give consideration to providing pump priming to ensure that development is not held back by issues relating to infrastructure provision.
Development should not occur in areas prone to flooding	We are in the process of producing a Strategic Flood Risk Assessment and this will be used to help guide decisions about the level and location of development.

6. Planning for the environment

Issue	Guildford Borough Council Response
There should be no need to provide Suitable Alternative Natural Green Space (SANG) as providing SANG encourages more development	We are required to provide SANG to accompany housing development occurring within a 400metre to 5km boundary of the Special Protection Area designated under European legislation. It is not that the provision of SANG encourages housing development but that housing development requires the provision of SANG.
There should be no building anywhere on the Green Belt	We are required to make adequate provision for our objectively assessed level of development need and this may involve the requirement for the Green Belt boundary to be rolled back to allow for this. No decisions have yet been made.
Green Belt should be protected and enhanced	The Local Plan will aim to protect the Green Belt but that there must be a balance drawn between protection of the Green Belt and the need to accommodate development.
The Green Belt and Countryside Study (GBCS) is fatally flawed and should be abandoned	The GBCS has been the subject of a scrutiny reappraisal and some additional areas of work have been identified to ensure that the study is as robust as possible. It is part of the Evidence Base and has been published so it would be inappropriate to withdraw it.
The area around Ash Green should be designated as Green Belt	Land can only be considered for designation as Green Belt if it fulfils the purposes of the Green Belt and we will look at the potential for additional Green Belt as part of the overall development strategy for the borough.
The Borough's landscape is worthy of protection	We acknowledge that the borough's landscape is worthy of protection and will aim to balance that against the need to make appropriate provision for our identified level of need.
The Green Belt and Countryside Study identifies inappropriate potential areas for development	The Green Belt and Countryside Study is one piece of evidence that will not be used in isolation to determine where development should be located. Identification as a Potential Development Area does not mean that those sites will be allocated for development as the GBCS only looked at Green Belt issues and did not take into account other considerations such as flooding and land designations.
Villages should not be inset into the Green Belt	The proposals to inset villages into the Green Belt is in line with guidance in the National Planning Policy Framework. No decisions have yet been made about which villages will remain in the Green Belt and which will be inset
Green Belt boundaries should not be altered	Any alteration to Green Belt boundaries would be taken in light of the need to make adequate provision for our identified housing need
Flooding should be dealt with at a strategic level	We will continue to work with our partner organisations who share responsibility for dealing with flooding issues to ensure that flooding is dealt with at an appropriate level

7. Planning for our towns and villages

Issue	Guildford Borough Council Response
Groundwater protection and water quality should be strategic issues	We will continue to work in partnership with those bodies and organisations who are responsible for dealing with issues of groundwater protection and water quality. The Local Plan will contain appropriate policies to deal with these issues.
The scoring and information is wrong and leads to incorrect conclusions and ranking of settlements is incorrect	The information in the main came from the Parish Councils but we are checking this information and will amend it where necessary. We will no longer use the functional score to help determine where development should occur
There is a need to use other factors to help determine distribution, not just the Settlement Hierarchy	The Settlement Hierarchy is one piece of evidence and we will use other evidence to help direct and support decisions on where development should be located
Growth should be proportionate	The NPPF seeks to achieve sustainable development. It also states that in the rural areas development should be located where it will enhance or maintain the vitality of rural communities. We are therefore seeking to direct development towards those areas that are sustainable or can be made so. We also need to consider the availability of sites and how to best maximise improvements to supporting infrastructure. Given this it is not necessarily appropriate to evenly distribute development across the borough.
Disagreement with the scoring for certain settlements	We acknowledge that local circumstances will change over time and that some of the scoring has been applied incorrectly so we will no longer be using the functional score element of the Hierarchy. We are reviewing the information submitted and have invited the Parish Councils to resubmit information which we will then look at and assess to see if any of the ranking in the Hierarchy should be amended. It is unlikely, however that any changes would materially affect the position of different settlements in the Hierarchy.
Villages should not be inset and should remain covered by Green Belt.	The NPPF states if it is necessary to prevent development in a village primarily because of important contribution that the open character of the village makes to the openness of the Green Belt, the village should be included within the Green Belt. If however the character of the village needs protection for other reasons, alternative means should be used, such as conservation area status or normal development management policies, and the village should be excluded from the Green Belt. (Our emphasis) For the Local Plan to be found sound we need to be in conformity with the NPPF and the Green Belt and Countryside Study (GBCS) has assessed all of our villages and concludes that some villages do not contribute to the openness of the Green Belt and therefore should be inset. However, no decisions have yet been made about which villages will be inset and the GBCS is only one piece of evidence that does not direct policy.
The Green Belt and Countryside Study is biased in favour of development and did not consider other factors, its methodology is so flawed it should be abandoned.	The Green Belt and Countryside Study only forms part of the Evidence Base in helping us to direct development towards the most sustainable locations. However we will need to use a range of other evidence base documents to help us decide where development should go.
Green Belt boundaries should not be amended, Green Belt is sacrosanct	Green Belt designation is not a blanket ban to all development and that we have

Issue	Guildford Borough Council Response
	been urged by the Department for Communities and Local Government to 'leave no stone unturned' in our search for land to accommodate our assessed level of need. The Borough is 89 per cent Green Belt and it is unlikely that we will be able to accommodate all of our assessed need within the urban areas.
Insufficient attention has been paid to the potential for development on brownfield sites	Whilst we would wish to locate most of the development on brownfield sites, our current research suggests that we do not have sufficient amounts of this land to accommodate our development needs. We have assessed capacity within the urban areas and on previously developed land and will continue to update this assessment through the Strategic Housing Land Availability Assessment.

8. Cross boundary issues

Issue	Guildford Borough Council Response
There should not be a presumption in favour of development	We are required to produce a plan in conformity with the NPPF and the presumption in favour of sustainable development is the central theme of the NPPF. The Local Plan will therefore reflect that theme in its overall strategy and in the detailed policies.
Parish Councils should be treated the same as prescribed bodies for the purposes of discharging the duty	The prescribed bodies for the purposes of discharging the duty to cooperate are set out in guidance/legislation and Parish Councils are not within that list. We will however continue to work closely with Parish Councils in developing the policies to form the new Local Plan.
The University should be treated as a prescribed body for the purposes of discharging the duty.	The University is not one of the bodies set out in the guidance as a prescribed body for the purposes of discharging the duty to cooperate. We do acknowledge the valuable contribution that the University makes and will continue to work in partnership.
You need to work with neighbouring authorities including the County Council	We will continue to cooperate and work in partnership with neighbouring authorities including the County Council to help discharge our responsibilities under the Duty to Cooperate.
Housing assessment should not take into account need arising from other council areas	We have to make provision for all need in the borough where it arises. We have no power to stop people moving into the borough from other areas and we have to reflect the reality of the situation including making an allowance for in migration.
Bus providers should be treated as prescribed bodies	The Bus providers are not one of the bodies set out in the guidance as a prescribed body for the purposes of discharging the duty to cooperate. We do acknowledge the valuable contribution that Bus providers make and will continue to work in partnership with them to ensure that adequate and appropriate services continue to be provided.

9. Planning for sites and spatial options

Issue	Guildford Borough Council response
Cooperation is required over the issue of accommodation for travellers	We are in active cooperation with our neighbours over the issue of Traveller accommodation. We have agreed a common methodology to help us accurately assess the demand for traveller accommodation.
Support for the redevelopment of buildings and spaces in the towns and villages	We welcome support for the redevelopment of buildings and spaces in towns and villages, as this is often the most sustainable choice for development.
None of the choices make an appropriate level of provision for housing as they are all too high	We need to make provision for our identified level of need. We have identified the need we need to accommodate according to best practice and in line with current guidance. We will then need to assess how much of that need the borough can accommodate in a sustainable manner
Objection to any development that impacts on the AONB., Green Belt and AGLV	Given the borough is 89 per cent Green Belt and 46 per cent AONB it is unlikely that any level of development however low will impact on the designated areas. It is the role of the Local Plan to balance the competing demands of protecting and enhancing our environment and accommodating our identified level of need.
It is not possible to object or support any of the choices in the absence of a housing number	It would be premature at this initial stage in the Local Plan process to prescribe what the housing number should be. We will look at all the evidence we receive and at our research to determine what the appropriate level of new homes should be.
An allowance should be made for windfall development	The regulations have recently changed regarding windfall development so we will be reassessing how we incorporate this element into our calculations.
The SHLAA needs updating to show all available land for development	The Strategic Housing Land Availability Assessment will be updated on an annual basis to reflect the most up to date assessment of land that is available for development to help meet our identified need.
Concern about the cumulative impact of new housing and other development	It is the role of the Local Plan to balance the competing demands of protecting the environment and accommodating our identified need and this includes carefully assessing the impact of new housing and other development on the local area and beyond.
Countryside beyond the Green Belt should continue to be protected from development	Countryside Beyond the Green Belt (CBGB) is a local designation that is given a relatively high level of protection in the Local Plan (2003) but which is no longer consistent with national policy. Given the important status that the Green Belt designation has in the National Planning Policy Framework it is important that we assess the extent to which this land could accommodate future growth thereby reducing where possible the reliance on Green belt land.
Support for the provision of new Green Belt land	We support in principle the idea of new Green Belt but any land designated as such should fulfil the purposes of the Green Belt as set out in guidance and legislation.
Objection to the use of blanket densities	Wherever possible we have used densities calculated on an individual site basis, but we acknowledge that the GBCS uses a blanket density figure of 40 dwellings per acre. As our spatial strategy develops we will be able to consider appropriate

	densities for development sites.
Support for the development of higher densities in urban areas	We acknowledge that higher densities can be achieved in the urban areas but this cannot be to the detriment of the character and appearance of the area. Higher densities are not always appropriate bearing in mind the impact on townscape and landscape matters.
Objection to the development of certain sites including Wisley, Ash and Tongham, Gosden Hill, Blackwell Farm, Gunners Farm, Bullens Hill Farm, land north and south of Salt Box Road, West Clandon. Pewley Down, Aldi in Burpham and Waitrose in Guildford Town Centre, Wood Street Village, Shalford, Chilworth. Park and ride at Worplesdon,	We acknowledge that there are sites that people would wish see not be developed but the Local Plan has to seek to direct development towards the most sustainable locations. Determination of the spatial strategy will take into consideration all relevant factors.
Outstanding planning permissions should be implemented before any new permission is granted	We currently have no powers to insist on the implementation of extant planning permissions before granting any new consents. We will however continue to encourage developers to build out any existing permissions where development remains viable and sustainable
Provision should be made for more natural and green cemeteries	We need to continue to seek additional capacity in the borough for natural and green burial space as well as traditional burial space and crematoria. Consideration will be given as to whether developers of any strategic sites will be required to provide or contribute towards the provision of burial space.

10. Making it happen

Issue	Guildford Borough Council Response
There is a need for an assessment of open space across the borough	We acknowledge that we need to assess the provision of open space including Blue and Green infrastructure so that we can plan properly for the provision of any additional open space required due to the impact of new development. This will include assessing where deficiencies in provision occur and how this can be met.
There is a need for a Town Masterplan	Whilst we acknowledge that the Town Centre requires a bespoke approach a Masterplan cannot make any site allocations or prescribe any policy approach as this is the role of the Local Plan. Consultants have been appointed to produce a Town Centre vision which will lead to a Town Centre Supplementary Planning Document.
The Surrey Hills AONB needs greater emphasis	We acknowledge that the AONB is amongst the most strongly protected land in the country from major development due to its nationally important landscape value. We are not suggesting that major development occurs within the AONB
The Green Belt needs greater protection	Whilst our plan will recognise the enormous value that the Surrey Hills AONB landscape and the Green Belt makes to the character of the borough, the National Planning Policy Framework (NPPF) 2012 also requires us to plan positively, i.e. not simply be protectionist and say no to development. It requires us to make every effort to identify and meet the housing, business and other development needs of the area. This is one of the tests to which our draft plan will be subjected to, at independent examination in order for us to be able to adopt a new local plan

Current infrastructure is inadequate especially transport	We acknowledge that there are issues with the current level and capacity of infrastructure but the plan must be positively prepared and forward looking. We will continue to work with partners such as the Highways Agency and Surrey County Council as the Highways Authority to ensure that issues relating to infrastructure especially transport related infrastructure is adequately addressed.
Local designations should be protected and enhanced.	The NPPF says distinctions should be made between the hierarchy of international, national and locally designated sites so that protection is commensurate with their status. AGLV is a local designation and we will consider how we will take protection of this area forward. We will not be able to give AGLV the same status as other national or international designations.
Development should be sustainable	We are required to produce a plan in conformity with the NPPF and the presumption in favour of sustainable development is the central theme of the NPPF. The Local Plan will therefore reflect that theme in its overall strategy and in the detailed policies and will direct development towards the most sustainable locations
Guildford should retain its character	The Local Plan will aim to protect and enhance the character of Guildford whilst at the same time seeking to balance the need to accommodate our objectively assessed level of development.
The current Local Plan should be rolled forward	We cannot simply roll the extant 2003 Local Plan forward. There have been considerable changes in both legislation such as the Localism Act since the adoption of the 2003 Local Plan and in guidance such as the National Planning Policy Framework and the National Planning Practice Guidance, which means that the policy approaches adopted in 2003 are not necessarily in conformity with current guidance and legislation
CIL must be affordable and must not affect the cost of new homes	CIL will be subject to a viability assessment that will look at the affordability of the charging levy and its impact on house prices and supply of new homes.
Delay in implementing CIL must not be allowed to adversely affect the provision of infrastructure	We are progressing the adoption of a CIL charging schedule alongside the production of the Local Plan. CIL has a long legal process that must be followed to ensure that the proposed level of charging is viable and achievable and that we have identified appropriate projects to be funded by CIL.
Development should be conditional upon the provision of appropriate infrastructure	We will require the provision of adequate and appropriate infrastructure to accompany major development proposals and will provide for all development to contribute towards the funding required through Section 106 Legal Agreements or CIL as appropriate.

11. Any other views

Issue	Guildford Borough Council response
Diagrams in Appendix D are misleading as they are at different scales	The diagrams in Appendix D are of differing scales as the sites vary in size considerably. The commentary alongside each site form illustrates the scale of the site and the scale of development that has been used as an illustration of what site capacity might be.
Consultation on the Issues and Options has been inadequate	Consultation on the Issues and Options has exceeded the statutory requirement by a large margin. The Issues and Options featured in three separate articles in About Guildford, was the subject of a major publicity campaign and had a very wide consultation exercise associated with it. Workshops and pop up events were held around the Borough and a leaflet campaign was also carried out. In addition a separate youth engagement strategy was devised and followed and particular efforts were undertaken to reach hard to reach groups.
West Horsley should be kept in the Green Belt	The NPPF gives us a very clear direction about how villages in the Green Belt should be treated. The suggestion that West Horsley is inset into the Green Belt is in line with the NPPF.
Chilworth should be protected from inappropriate development	We acknowledge that there is a conservation area, and we need to relook at whether it should remain as a potential development option. This will be done as part of further work on the Green Belt and Countryside Study (volume V). We will take account of the findings of this as we update the Strategic Housing Land Availability Assessment, and move towards preparing a draft Local Plan.
Save the Hogs Back and remove it from the consultation	The consultation exercise on the Issues and Options has concluded and that it was carried out containing a suggestion that development might occur on Blackwell Farm. It is not possible to re run the consultation and remove this site as this would be considered premature in advance of any decisions being made about what the level and location of development should be.
E22 and E23 must not be built on	E22 and E23 have been identified as Potential Development Areas (PDAs) by the Green Belt and Countryside Study. This study is one part of the evidence base and no single part of the Evidence Base will dictate policy or direct development towards particular locations. There are a number of considerations that will need to be taken into account to determine what the level and location of development might be. At this stage in the process no decisions have been made about where and how much to build and it is therefore premature to rule in or out any particular sites.
The questionnaire is too long and complicated	We appreciate that the questionnaire has 41 questions in it and that it might be felt to be overly long and complicated. The Issues and Options by its very nature is seeking to ascertain what issues the Local Plan should deal with and what options might be available to deal with those issues. The questionnaire was not the only means of engaging in the consultation process. We will take on board all comments received about the consultation process in designing the consultation to accompany the publication of the draft Local Plan.

Draft

Appendix 4: Responses to comments on Policies 1-19 of the Draft Local Plan: strategy and sites (2014)

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Comments on the Introduction chapter

Issue	Guildford Borough Council Response
<p>Infrastructure:</p> <ul style="list-style-type: none"> • Impact of housing on road and rail infrastructure • Town centre congestion • The inadequacy of the A3 • Flood risk must be addressed • Growing air, light, noise and water pollution • Aviation impact in Surrey • Change may be beneficial but continued population growth is not inevitable or necessarily desirable. 	<p>The impact of development on infrastructure is addressed in greater detail in the table for Policy 17</p>
<p>Structure:</p> <ul style="list-style-type: none"> • Review the order and description of the chapter headings, it lacks coherence and is not simple to explore. • Chapter headings from the Surrey Structure Plan 2004: PART 1: Spatial Strategy, Location of Development, Managing Urban Areas, Town Centre, Countryside & Green Belt, Rural Settlements, Housing Provision, Employment Land, Retail Development PART 2 : Natural Resources & Planning Control, Renewable Energy & Energy Conservation, Flooding & Land Drainage, Design & Quality of Development, Protecting the Heritage, Biodiversity, Nature Conservation, Landscape, Trees & Woodland, River Corridors & Waterways.PART 3 : Infrastructure Provision, Parking Provision, Public Transport, Aviation, Housing, Tourism and Recreation. 	<p>The structure of the 'Draft Local Plan: strategy and sites' has been reviewed and updated. Policies within the 'Proposed Submission Local Plan: strategy and sites are grouped into the following categories: strategic policies, housing policies, protecting policies, economy policies, design policies and infrastructure and delivery policies.</p>
<p>Foreword: Cllr Mansbridge</p> <ul style="list-style-type: none"> • Structure of the document with political statements at the start of the document • Phrasing of statement particularly comments on Green Belt • Has the full potential for brownfield sites been fully explored? • Applaud the frankness of these comments in the Foreword • Concerned over the level of growth planned for Guildford and the number of errors and peculiarities in methodology are undoubtedly borne out of this statement. This confirms that there is planned growth for the UK and confirms Guildford's position as a 'growth hub'. This is therefore not about the needs of today but of tomorrow. It is not about Guildford's needs, but is about a wider desire to become an economic powerhouse. • We recognise the council's "intensely difficult balancing act" and the anxiety stated in the Foreword about resolving data "which may affect the housing number". Nonetheless we stress the importance of moving forward with a plan that offers certainty and confidence in regard to the housing numbers 	<p>Comments noted. The previous forewords have been deleted.</p>

Issue	Guildford Borough Council Response
<p>so that optimal sites that are shown to be deliverable can be brought forward at the earliest opportunity.</p> <ul style="list-style-type: none"> Paragraph 6 of Stephen Mansbridge's introduction is not correct and gives a misleading impression to readers. The Green Belt and Countryside Study does not allocate land for development nor does it imply that land is suitable for development however the study does purport to offer a range of sites that the Council may choose to allocate through the Local Plan process. However that list has been arrived at in an arbitrary and unfair way, putting forward some sites whilst ignoring other similar sites. Sites which have been promoted for some time have been the subject of arbitrary selection by Officers <u>before</u> the latest Strategic Housing Land Availability Assessment (SHLAA) was prepared. It does not represent a sound approach to plan making which will satisfy the Statement of Community Involvement. A figure of 652 dpa does appear in the Foreword on p3 in the section written by the Leader of the Council, who appears to want to make it stick without exposing himself by tabling a formal policy proposal. Since the form of the online consultation makes it difficult for the public to comment on the Foreword, this is underhand. 	
<p>Foreword Cllr Juneja</p> <ul style="list-style-type: none"> '<i>Whilst it is not desirable to develop on Green Belt sites... gives us a situation where we have no alternative.</i>' it has already been decided that there is no alternative and that for financial reasons, development of brown field will not bring about the level of finance needed for the plans Guildford has. This is not what the NPPF is about. We are also told by both Councillors that legal precedents have been set and that development by appeal is very likely if we don't have a plan in place. Ministers have refuted this claim. It is stated in the Foreword that the plan will "not overburden any single area of the borough". But is this true when applied to the potential effect on Effingham Lead Councillor for Planning and Governance has stated in her introduction that 'We have sought to select sites carefully and in a way which does not overburden any single area of our borough and ensure that the right infrastructure is in place'. This is clearly not the case. 	<p>Comments noted. The previous forewords have been deleted.</p>
<p>Development document:</p> <ul style="list-style-type: none"> Explanation of the role of the "Development" document When will the 2nd part of the Local Plan "delivering development" be available for consultation, and where does it fit into the consultation/submission schedule? (e.g. Stages Of Preparing The Local 	<p>The timetable and role of the development management document has been set out in the Local Development Scheme (LDS).</p>

Issue	Guildford Borough Council Response
<p>Plan diagram at end of this section).</p> <p>Evidence base:</p> <ul style="list-style-type: none"> • Wording implies evidence base is complete • Inaccuracies in some of evidence base highlighted by me have not been corrected • Evidence base constantly changing, with no document tracking so that respondents cannot be sure that they respond to the most recent version. • Additions to the evidence base during the consultation, (Vol 6 GBCS, Sustainability Appraisal) may render comments made beforehand invalid and incomplete. Draft joint SHMA yet to be published – but the housing number is supposed to be the driver for everything else that informs the Local Plan. Unable to comment rationally when we do not have the most important piece of information • In the face of a changing and incomplete evidence base the wording of this section should recognise the incompleteness of the Evidence Base • the draft Local Plan has proceeded to this consultation stage before any real studies have been undertaken and proven to provide evidence for its content, even in draft • The Scrutiny Committee voted to revise the housing number in the draft Strategic Housing Market Area (SHMA) prior to issue of this consultation, because the SHMA number is overstated (errors in the ONS key data used, misapplication of ONS data, using a time period that is short and that inflates the projection and other matters). The housing number is overstated, and therefore should be reviewed prior to the issue of this document. Since the housing forecast informs most of this document it is fundamental and so changes in the housing forecast should be taken on board prior to this consultation process; a view shared by the Scrutiny Committee, by the MPs in the borough and by 15 councillors who opposed the plan to go to consultation at this stage. As a result, this plan should be revised prior to consultation. 	<p>Much of the evidence base has been updated since the regulation 18 consultation.</p> <p>A detailed response to the evidence base is provided in the table for Appendix C: Evidence Base.</p>
<p>Consultation</p> <ul style="list-style-type: none"> • Summary of the comments made in earlier consultations, such as number of submissions, by ward; those in support, those against has never been provided by GBC, fueling the suspicion that previous submissions have been disregarded. • Previous comments by residents have been ignored and not informed production of draft LP • This process does not allow residents to see and comment upon how their feedback has been integrated into the final plan - it makes a mockery of consultation. Undemocratic if we cannot vote upon the plan or endorse it 	<p>Comments noted.</p> <p>Consultation responses have been looked at and taken into account where possible.</p> <p>The previous consultations on the Council's Issues and Options publication and Draft Local Plan have provided several opportunities to comment on the Local Plan. Public consultation will also be held for the 'Proposed Submission Local Plan: strategy and sites'.</p>

Issue	Guildford Borough Council Response
<p>before it is presented to the secretary of state.</p> <ul style="list-style-type: none"> • The whole process is being rushed through. The citizens of Guildford Borough are not permitted enough involvement or actually being listened to. • Consultation is designed to confuse people to be discouraged from commenting in order that you do not get objections. This is not a democratic process and it certainly does not reflect the wishes of the people of Guildford Borough. You do not have their support - listen hard to the objections that have been made. 	<p>The consultation process has been in accordance with, and indeed exceeded, the relevant regulations. The consultation was well publicised, and officers were available to help explain (in person or on the phone) how to respond to the Local Plan, either online, through email or by writing.</p>
<p>Overall document:</p> <ul style="list-style-type: none"> • Some of the document is too vague and passive, e.g. "we expect...", "...should..." etc, instead of stating firm requirements. • Sometimes it tends to mimic the NPPF by only projecting general aspirations rather than distilling them into enforceable local policy statements backed up by solid reasoning - looks more like a manifesto than a plan, and makes it easier for lawyers to pick holes in it. • If real policies are to be defined in various off-shoot documents, e.g. Delivering Development, Development Control, Visitor Strategy, those documents should presumably always be referenced in the policy boxes themselves. • There seems to be quite a lot of unnecessary padding and repetition in the policy sections • The current Draft Local plan is so devoid of any meaningful proposals apart from an overblown annual housing number that such significant changes will have to be made that "consideration" of the results of public consultation will not be sufficient, it will need to be redrafted and re consulted. • I do not agree with the way this Local Plan is being delivered. • Object to all policies in the draft local plan • Object to para 1 Starting "This draft local plan...." The vision for the town centre has only just been seen, and is exactly that, a "vision". The finances to bring this about are not in place, and much remains to agree, especially the traffic concepts and flows • Object - Paragraph 6 Starting "Our Housing Number...." This is misleading as all constraints have not been applied and no consideration appears to have been taken of environmental factors like the Thames Basin Heaths and Common land. • Object - Paragraph 7 Starting "Whilst this is emotive...." "This encapsulates the problem with this draft local plan. There is an assumption, which is not supported by the facts, on the SHMA number. Many of the presentations to the public gave this view, in what can only be described as an attempt to 	<p>Comments noted.</p> <p>The 'Proposed Submission Local Plan: strategy and sites' document aims to set out the strategic priorities for the borough with carefully worded clear policies. The policies need to comply with the National Planning Policy Framework. Detailed responses to specific planning issues are addressed in the relevant sections of this document..The Land Availability Assessment has taken an overall look at potential development sites across the borough.</p>

Issue	Guildford Borough Council Response
<p>drive a growth agenda.</p> <ul style="list-style-type: none"> Enterprise M3 urges Guildford Borough Council to proceed with policies focused on delivery of new development (housing, commercial space and infrastructure) in order to accelerate what can otherwise tend to be a relatively slow process. Too many simultaneous potential development schemes under consideration – impinging upon making a rational decision -pause and take stock rather than proceed in what appears to be a somewhat confused and random master planning process 	
<p>Area of Outstanding Natural Beauty:</p> <ul style="list-style-type: none"> Agree Natural England should review/expand AONB boundaries to include AGLV 	<p>Comments noted. Natural England are likely to undertake this work within the next few years.</p>
<p>Timetable:</p> <ul style="list-style-type: none"> Process be expedited Stick to the timetable This will ensure the delivery of a five year land supply. 	<p>The timetable is set out in the LDS, available to view at www.guildford.gov.uk/lds</p>
<p>Policies map: The intention in para 1.13 to identify safeguarded sites and designated safeguarding areas in the Surrey Minerals and Waste Development Framework is strongly supported. (SCC)</p>	<p>The policies map has been reviewed and this issue has been addressed.</p>
<p>All Policies as laid out in the Guildford Draft Plan: I object where the Guildford Greenbelt Group objects and support where the Guildford Greenbelt Group supports</p>	<p>Comment noted.</p>

Comments on Key Facts about the borough chapter

Issue	Guildford Borough Council Response
<p>Policies are poorly worded</p>	<p>This comment has been responded to in the table on national guidance</p>
<p>Policies unenforceable</p>	<p>This comment has been responded to in the table on national guidance</p>
<p><i>Evidence and data:</i></p> <ul style="list-style-type: none"> Evidence base is incomplete and inaccurate Demographic projections are incorrect, so housing need is wrong Data for Index of Multiple Deprivation is out of date Should not use old data with the view of reviewing it Not made clear that SHMA will be updated To have such a high housing projection, we must be catering for inward migration Only need 5000 new homes and they can all be built on brownfield 	<p>The Council's objectively assessed housing, employment, retail and leisure needs have been determined in the Strategic Housing Market Assessment, Employment Needs Assessment and Retail and Leisure Study (each published in Autumn 2015). The documents are considered to adopt a sound methodology and the figures contained within deemed accurate. Comments relating to the evidence base have been responded to in further detail in the table for Appendix C: Evidence Base.</p> <p>Other facts and figures used in Chapter two have been updated in preparation of the proposed-submission Local Plan.</p>

Issue	Guildford Borough Council Response
<ul style="list-style-type: none"> • No satisfactory explanation for the need for housing number • Too much in a small town • Trends have been assumed to continue but may well not- rise in university attendance before increase in fees, entrance into UK after EU access changed • Have surveys in 2.13 been taken into account? • Past population projections do not have fixed gaps between and are actually incorrect • The % of those in employment has actually fallen, not grown 	
<p>Strategy for growth:</p> <ul style="list-style-type: none"> • No real effort to focus development in the urban areas • Focus development in the town centre to mitigate transport issues. • Borough is already close to capacity • Affordable housing will create a need that can't be met 	<p>Comments not specifically related to Facts and Figures chapter. However, the introduction notes the Council's approach to delivering the borough's objectively assessed needs. The Council will deliver growth through the development of a small number of strategic sites on the urban fringe and the controlled realignment of the green belt.</p>
<p>Green Belt:</p> <ul style="list-style-type: none"> • No reason to remove land from Green Belt • No reason to inset any villages • Must accept that the objective to build thousands of homes, and therefore sacrifice Green Belt are wrong • Housing is not an exceptional circumstance • Building on Green Belt ruins a natural flood defence 	<p>Comments not specifically related to the Facts and Figures Chapter. Comments relating to the Green Belt are addressed in the policy 10 table and the table for Appendix C: Evidence Base.</p>
<p>No evidence that extra infrastructure will be put in place</p>	<p>The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure to support the planned development which is expected to place extra pressure on existing infrastructure, or to need new or improved infrastructure. The IDP will be updated as further detail on supporting infrastructure is available. Developer contributions and other funding sources will be used to ensure that key infrastructure is delivered when it is needed, including at the planning application stage.</p>
<p>Water pressure is already very low</p>	<p>Comment not specifically related to the Facts and Figures Chapter. Water pressure within the water delivery network is generally a matter for the water providers. This comment could refer to pressure on water supplies. The Council has already adopted the most stringent water efficiency standard allowed by national policy for new build dwellings to help improve water efficiency and conserve stocks. This standard is continued within Policy D2 Sustainable Design, Constructions and Energy.</p>

Issue	Guildford Borough Council Response
Disregard to the environment and nature conservation	Comment not specifically related to the Facts and Figures Chapter. However, the introduction highlights the plan's intention to meet the borough's objectively assessed needs whilst protecting our special heritage and natural environment. The Green Belt, AONB and other areas of biodiversity/natural importance will be protected from inappropriate development. These points are reiterated in Vision and Strategic Objectives.
Response system is too complex	Comment responded to in the table for Question 7.
No mark up of changes	Comment responded to in the table for Question 7.
No evidence of how constraints have been applied	Comment responded to in the table for Question 7.
Impact of the Plan: <ul style="list-style-type: none"> • No one will benefit from this Plan • Plan isn't balanced due to the scale • Plan as it is would ruin Guildford 	Comment is not related to the Facts and Figures chapter specifically. However, the plan is designed to meet the borough's objectively assessed needs whilst protecting our special heritage and natural environment. The plan aims to improve the prosperity of the borough and residents quality of life. Comments relating to the evidence base are responded to in the table for Appendix C: Evidence Base
It's good to travel to and from work, and live near a school instead	Comment noted.
If University cost less, people could save for a deposit sooner	The Council is not responsible for determining university tuition fees.
Need for housing: <ul style="list-style-type: none"> • People need a place to live, so housing is necessary • Houses should be built for people who work locally as travel to London is too expensive • Support that housing is a strategic issue and there is a need for more housing to meet OAN 	Comments noted
Student numbers should not outweigh general population growth	The Strategic Housing Market Assessment looks at student numbers in detail, and we expect a proportion of students to be accommodated on land owned by the university. Policy H1 of the Proposed Submission Local Plan: strategy and sites addresses student housing.
Housing strategy: <ul style="list-style-type: none"> • What is the Interim Housing Strategy and the Homelessness Strategy? • What is the Homelessness Strategy 2013-2018? 	The Draft Housing Strategy (formerly known as the Interim Housing Strategy) outlines the Council's ambitions for housing provision in the borough over the next five years. The document focuses on affordable housing and the use and quality of existing homes. The Homelessness Strategy (2013-2018) was published by the Council in 2013. The document reviews homelessness in the borough and outlines a strategy for preventing it. National legislation requires housing authorities to carry out a review of homelessness and produce such a strategy every five years.
Unhelpful to look at Guildford in National context, but rather in relation to London, given this is the real driver of house prices	The Facts and Figures chapter compares local statistics with those for the wider Surrey region and national picture. This approach provides a useful overview of the borough's context and how it is performing nationally and regionally. Whilst the

Issue	Guildford Borough Council Response
	borough's proximity to London undoubtedly has an influence on house prices, comparisons with London are not considered appropriate given the contrasting demographics, land values and urban forms of the borough and the city.
<p>Infrastructure:</p> <ul style="list-style-type: none"> • Infrastructure is needed before Guildford can grow • No point building houses if infrastructure cannot support 	The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure to support the planned development which is expected to place extra pressure on existing infrastructure, or to need new or improved infrastructure. The IDP will be updated as further detail on supporting infrastructure is available. Developer contributions and other funding sources will be used to ensure that key infrastructure is delivered when it is needed, including at the planning application stage.
I&O was a sham with no formal analysis response	Comment not specifically related to Facts and Figures chapter. Comment has been responded to in the table for Question 7.
So many new residents, but given the aging population, why so many new jobs?	The Employment Needs Assessment (2015) identifies the borough's objectively assessed needs for employment land use. The document outlines the required floorspace and explains how it has been derived. Comments relating to employment needs are responded to in greater detail in the tables for Policy 13 and Appendix C: Evidence Base.
HRA and SA published too late and too hard to understand	Comment not relevant to the Facts and Figures chapter. The issue has been responded to under Question 7 of the questionnaire.
Evidence base should have summary docs too	Comment not relevant to the Facts and Figures chapter. The issue has been responded to under Question 7 of the questionnaire.
Council is following a business interest, not the interests of residents	Comment not specifically related to the Facts and Figures chapter. The comment has been responded to in the table for Question 7.
Need to stop landlords buying the cheap houses and renting for high profit	Issue not in the power of planning policy.
Section should highlight the importance of the University of Surrey and Surrey Research Park for employment	Comment noted. However, the importance of the university and Surrey Research Park are recognised elsewhere in the Plan.
Blackwell should be for 3200 homes, making full use of the space, including land to extend Surrey Research Park	Comment not specifically related to Facts and Figures chapter. Comments relating to specific site allocations are responded to in Planning for sites - around Guildford urban area.
Urgent need to address the fact that workers cannot afford homes- do not want to undermine the future prosperity of Guildford	This point is noted within the Facts and Figures section of the 'Proposed Submission Local Plan: strategy and sites'.
<p>Sustainable travel:</p> <ul style="list-style-type: none"> • Avoid development where private cars would be necessary to access facilities • Developments linked to the Sustainable Movement Corridor should be favoured- hence development at University of Surrey and Surrey Research Park would be appropriate 	The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'. Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The

Issue	Guildford Borough Council Response
	Transport Strategy and IDP may therefore be updated to include these. As planning applications are considered for the sites identified in the new Local Plan, additional transport schemes to address site access and other localised issues may be secured.
Review of SHMA suggests number could be higher, to provide more affordable homes	Comment not specifically relevant to the Facts and Figures section. Comments relating to the SHMA are responded to greater detail in the table for Appendix C: Evidence Base.
Skill shortages in the borough due to high house prices	Comment noted and reflected in the chapter
Guildford borough also has 151 designated Areas of High Archaeological Potential (AHAP); 37 County Sites of Archaeological Importance (CSAI); 35 Scheduled Monuments and 10 Registered Parks/Gardens. These all contribute to the heritage significance of the borough	This point has been noted and added to the revised text.
<p>Confuses the contents of the SWP with the contents of the SMP as the SWP does not contain a Policies Map and does not include safeguarding areas. It is suggested that the final sentence of paragraph 2.23 is revised as follows: “The Key Diagram and Site Maps identify the allocated sites for waste management use which are safeguarded from development.” It is suggested that references to ‘minerals safeguarding areas’, ‘Aggregate Recycling Joint DPD’ and Surrey Minerals and Waste Plan’ in paragraph 2.24 are replaced with “mineral safeguarding areas”, “Aggregates Recycling Joint DPD” and “Surrey Minerals and Waste Plans”.</p> <p>It is suggested that the fourth sentence in paragraph 2.25 is amended to read, “The Aggregates Recycling Joint DPD allocates...facilities”, and the fifth sentence is amended to read, “It should be read...Minerals Plan Primary Aggregates DPD 2011”.</p>	Comments regarding the Surrey Waste Plan have been noted and amendments made accordingly (as suggested). The Policy map has also been revised.
The borough council should consider including a reference to the Enterprise M3 LEP Strategic Economic Plan in this section or the following chapter of the document.	The Regulation 19 Local Plan makes reference to the LEP and its role in the growth of the region.
Staff (consultants) have little knowledge of area so cannot answer questions	Comment responded to in the table for Question 7
Officers have stuck to a script so do not engage in discussion	Comment responded to in the table for Question 7
Notes have not been made	Comment responded to in the table for Question 7
Presentations have been inaccurate	Comment responded to in the table for Question 7
<p>Key Diagram:</p> <ul style="list-style-type: none"> • No reference to Seale and Sands in Key Diagram • New land around Burnt Common should be on Key Diagram • Should include the clay lane link road on key diagram • Should include the River Wey corridor on key diagram • Would be better to have more maps with less info as hard to comprehend 	The Key Diagram is an illustrative way to bring together the main components of the spatial strategy across the borough. Since the draft Local Plan 2014, this has been significantly redrafted to show the proposed key changes for the borough. This includes the proposals for strategic development areas, strategic employment sites, new railway stations and park and ride sites and changes to the Green Belt and countryside boundaries. A clearer base map has also been used which denotes places across the borough to allow readers to orientate themselves including villages and the River Wey. Specific site allocations, which are smaller in scale but

Issue	Guildford Borough Council Response
	still key to the delivery of the plan, are shown on individual site proformas within the Local Plan.
Need to make reference to the fact that new employment land is needed	Comment noted and reflected in the updated chapter.
UoS supports controlled realignment of GB and development of strategic sites	Comment noted
Completely wrong for the key retail areas to be the town and East Horsley, as East Horsley only has a handful of shops	Comments relating to local centres are responded to in greater detail in the table for policy 1 East Horsley is the largest village in the borough. Reflecting this, it has a district centre close to the station and a local centre
What is the new area of separation and why is it required?	Comment not specifically relevant to the Facts and Figures Chapter. Comments regarding the Green Belt are addressed in the table for Chapter 10.
The figures used in the Facts and Figures chapter misrepresent the demographic and economic context of the borough.	<p>The Facts and Figures Chapter of the 'Proposed Submission Local Plan: strategy and sites' is intended to provide an objective overview of the borough's physical, social, demographic, economic and environmental context. It points to both the strengths and weaknesses of Guildford as a place to visit, work and live in. The Chapter has been updated to include the latest statistics available (collected from various well known and reliable sources)</p> <p>Points relating to the borough's objectively assessed needs and the Council's evidence base are addressed in the table for Appendix C: evidence base.</p>

Comments on Our Vision and ambition

Issue	Guildford Borough Council Response
<p>General comments:</p> <ul style="list-style-type: none"> • Progressive objectives are well defined. Vision whilst futuristic is sensibly and sensitively balanced relative to increasing population demands • Juggling the needs of all groups, ages, needs & financial backgrounds is not going to be easy • It is important to tackle traveller integration head on • Believe the aspirations are reasonable and achievable • The vision for Guildford states the need for key aspects that would facilitate residential development. We support the principles outlined within the plan. • Vision is good. But you always fall down re "infrastructure"- & small businesses outside of towns closing • Could be more ambitious, cleanest, greenest, most high tech, super fast broadband in the country etc • Must be a positive strategy that plans appropriately for identified need • Will be hard to implement • If infrastructure improvements are not given priority they could get left out and forgotten due to budget cuts caused by another recession • Relies on mechanisms such as CIL to fund infrastructure once development has started however may never come to fruition. • The rest of the plan does not match with the vision, only focuses on housing development. Development should be contingent on being able to implement the infrastructure • Insufficient focus on providing new business premises, encourage high-tech start-ups, • Economic development of villages is important and that can be achieved by removal of strategic land from the greenbelt around current settlements. • Council must ensure that it gets the best use out of development sites. Council should decide what is needed and not the developers who just want to make a profit • Vision paints a picture of a very different environment to the one enjoyed today • The vision presents a strategy for unrestrained growth largely ignoring the social and environmental consequences • Our town will be ruined, vision for future communities is very bleak • Vision does succeed in depicting the borough of 2031. • Given that the vision itself is flawed, the strategy and plans are worthless • Vision for people or the council's ambitions? 	<p>The vision is an aspirational statement emphasising the place we want Guildford to be in 2033. Whilst it is intended to be ambitious and encourage us to plan positively, as we are required to do so by the NPPF, it also needs to provide a realistic and achievable strategy for development. The strategic objectives and policies of the plan set out how we intend to achieve the vision and create a prosperous borough which supports and provides opportunities to all of its residents.</p> <p>The vision and strategic objectives of the 'Proposed Submission Local Plan: strategy and sites' strategy and sites' outline the Council's ambition for developing an economically, environmentally and socially sustainable borough. We will meet our objectively assessed needs whilst protecting and conserving our special natural landscapes.</p> <p>The vision and strategic objectives of the plan are considered to comply with the principle in favour of sustainable development promoted by the NPPF and the NPPF as a whole.</p> <p>The strategic objectives are considered to be suitable, measurable, attainable, realistic and timely. We will measure the success of our Local Plan against these objectives using the monitoring indicators identified in each policy</p>

<ul style="list-style-type: none"> • Issues have not been addressed adequately • Vision is simply incorrect and inappropriate • The objectives are crazy and will destroy the area • Keep Guildford a lovely little town, not a suburb of London • The vision in the draft Local Plan is woeful and lacks any kind of ambition. It is a generic, any-town vision, is not aspirational • This proposal won't meet the hopes and expectations of the communities in the future by the year 2031. The emphasis on growth within the plan is too great and will destroy Guildford and its surroundings, its historical importance and its importance as positioned in the Metropolitan Greenbelt. • Work is required to ensure flexibility and deliverability • The scale of developments proposed means the aims won't be achieved. • The objectives are imprecise, not measurable and have no dates as to when they will be achieved. • More detail required in terms of the existing residue of non- implemented existing consents and likely permitted plot ratios and height restrictions to minimise impact on Green Belt • Consideration of the impact on current resident's enjoyment of the community • Consideration of the impact on neighbouring districts/ boroughs • Increase community based places • Suggest that the second bullet point in the box in the paragraph should be amended to read: • To be a place fostering world-class businesses and a centre for learning and research, development, design and innovation with capacity to expand and deliver growth in an evolving, vibrant and thriving economy 	<p style="text-align: center; opacity: 0.5; font-size: 48px; transform: rotate(-45deg);">Draft</p>
<p>Must be a positive strategy that plans for identified need, The overall vision for the borough needs to be more exciting</p>	<p>The vision is an aspirational statement emphasising the place we want Guildford to be in 2033. Whilst it is intended to be ambitious and encourage us to plan positively, as we are required to do so by the NPPF, it also needs to provide a realistic and achievable strategy for development. The strategic objectives and policies of the plan set out how we intend to achieve the vision and create a prosperous borough which supports and provides opportunities to all of its residents.</p> <p>The vision and strategic objectives of the 'Proposed Submission Local Plan: strategy and sites' strategy and sites' outline the Council's ambition for developing an economically, environmentally and socially sustainable borough. We will meet our objectively assessed needs whilst protecting and conserving our special natural landscapes.</p> <p>The vision and strategic objectives of the plan are considered to comply with the principle in favour of sustainable development promoted by the NPPF and the</p>

	<p>NPPF as a whole.</p> <p>The strategic objectives are considered to be suitable, measurable, attainable, realistic and timely. We will measure the success of our Local Plan against these objectives using the monitoring indicators identified in each policy</p>
<p>Vision and Ambitions:</p> <ul style="list-style-type: none"> • Vision should recognise the importance of maintaining the wildlife and environment. "Ensure the environment and green space is maintained and enhanced for the future." • The vision should be viewed holistically - no one component to be afforded any greater or overriding weight. • Vision should recognise ties with London, and that ensuring ready access to London will provide cultural and economic prosperity • Protecting and enhancing the environmental, historic and cultural assets of the borough should be made explicit as a fundamental part of the vision. • Specifically outline an ambition to meet the 'objectively assessed needs of the borough' • Seems like vision is to create a mini London or a city like Reading • Make environmental protection explicit in the vision 	<p>The vision is an aspirational statement emphasising the place we want Guildford to be in 2033. Whilst it is intended to be ambitious and encourage us to plan positively, as we are required to do so by the NPPF, it also needs to provide a realistic and achievable strategy for development. The strategic objectives and policies of the plan set out how we intend to achieve the vision and create a prosperous borough which supports and provides opportunities to all of its residents.</p> <p>The vision and strategic objectives of the 'Proposed Submission Local Plan: strategy and sites' strategy and sites' outline the Council's ambition for developing an economically, environmentally and socially sustainable borough. We will meet our objectively assessed needs whilst protecting and conserving our special natural landscapes.</p> <p>The vision and strategic objectives of the plan are considered to comply with the principle in favour of sustainable development promoted by the NPPF and the NPPF as a whole.</p> <p>The strategic objectives are considered to be suitable, measurable, attainable, realistic and timely. We will measure the success of our Local Plan against these objectives using the monitoring indicators identified in each policy</p>
<p>Too ambitious/not suitable long term:</p> <ul style="list-style-type: none"> • Too vague to form a judgement and creates aspirations that can never be met. • There is a lack for affordable homes and the jobs proposed would not pay enough for people to buy in the area - your vision is to ambitious • Your vision is not suitable in the long term. Lacks a suitable vision for the future • Vision should specify the kind of industry we want to attract 	<p>The vision is an aspirational statement of what we want the borough to look like in 2033. Whilst it is intended to be ambitious and encourage us to plan positively, as required by the NPPF, it also needs to provide a realistic and achievable strategy for development.</p> <p>The need to provide more affordable homes is recognised within our strategic objectives and other policies of the plan (most notably policies 3,4 and 5).</p>
<p>Housing:</p> <ul style="list-style-type: none"> • Existing community don't want 625 homes a year • Growth too high • We do not consider enough housing provision is being made in sustainable locations that will not have a negative impact on its surroundings • Not all dev needs for houses can be met by brownfield so other areas needed & chosen on good basis • The vision seems mainly intent on inflicting communities with unwanted 	<p>The vision and our strategic objectives outline the place we want the borough to be in 2033. Our housing target is informed by our objectively assessed need which has been derived from the West Surrey Strategic Housing Market Assessment (SHMA). Comments regarding the SHMA and objectively assessed need are responded to in the table for Appendix C: Evidence Base, whilst concerns relating to housing types are addressed in the response table for policy 3. The 'Proposed Submission Local Plan: strategy and sites' Policy H1 seeks a mix of housing tenures, types and sizes appropriate to the site size, characteristics and location. The SHMA found a need</p>

<p>housing developments throughout the borough</p> <ul style="list-style-type: none"> • Provides a choice of homes to meet the identified needs which supports the economic growth and much needed housing. • Need to ensure there is adequate provision in Guildford of housing for all social classes and age groups • Better facilities for the elderly required - housing suggested largely geared towards family homes and flats for younger people • Affordable accommodation for vulnerable & homeless • Focus more on the amount of housing, achieving the Objectively Assessed Housing Needs. • Housing number is too high. It is unsupported by sound data or data analysis and is unrealistic for a borough with the landscape and infrastructure constraints of Guildford • Emphasis must be on affordable, renting housing not millionaire mansions in the nice bits of the borough. • Limit amount of Buy to Let properties • The proposed achievements will be to the detriment of rural areas. The problem will not be resolved by 'hiveing off' no's into villages which are unable to sustain such large no's. • Build new villages from scratch instead of insetting current ones 	<p>for predominantly one and two bedroom affordable houses and two and three bedroom market housing and the supporting text of the policy sets this out.</p> <p>Other chapters of the Plan highlight how we will accommodate our objectively assessed need through the development of a small number of strategic sites and the controlled realignment of the green belt. Points regarding development in existing villages and the realignment of the green belt boundary are responded to in the tables for policy 9 and 10 and Appendix C: Evidence Base.</p>
<p>Employment/Economy:</p> <ul style="list-style-type: none"> • Guildford is an expensive area and the jobs you are providing will still not allow people to buy • Doesn't increase work opportunities in the locality • Opportunity to create a dynamic, knowledge based economic hub capable of creating jobs for future generations and significantly enhance GVA. • Supports economic growth in sustainable and accessible locations. • Support the expansion of the economic vitality of our rural areas. • Jobs, growth and services should wherever possible be grouped together. • The CLLR will support the continued economic growth of Guildford - strategic priority of the CLLR can be strengthened through revised wording • Too much focus on business growth • Enhancing Guildford's existing local centres, district centres and in particular, the town centre. These central areas contribute significantly to the success of the borough 	<p>The vision and strategic objectives of the 'Proposed Submission Local Plan: strategy and sites' outline our ambition to sustainably grow the borough's economy, with a particular focus on research and innovation. An emphasis is also placed on developing our rural economy and providing further training opportunities and access to employment.</p>
<p>Retail:</p> <ul style="list-style-type: none"> • Town centre retail expansion should be lower than in DLP • Put more shops in the suburbs • Light industry and retail does not seem like it will foster world-class 	<p>Retail and Leisure Study Update 2014 identified need for significant additional comparison floorspace. It is suitable to accommodate most of this within the shopping core of Guildford town centre.</p> <p>The hierarchy of retail and service centres that the draft Local Plan identifies</p>

<p>business of a dynamic economy.</p>	<p>provide access to essential everyday services to the whole population of the borough.</p> <p>Retail is a service that is needed to support residents lives.</p>
<p>Infrastructure:</p> <ul style="list-style-type: none"> • Insufficient understanding of day to day living in the area; infrastructure issues inadequate • I would prefer Guildford Town Centre to be less congested. Infrastructure will become overwhelmed. If GP surgeries, schools etc are not built it will put too much strain on existing resources • As the roads, welfare and schools are not managed correctly at the moment we can't be sure these will be managed correctly in the future and enough resources put in place • The infrastructure issues are not adequately addressed, particularly traffic/road matters • Catastrophic effect on the infrastructure of the borough and is totally unsustainable • Congestion isn't being addressed, especially the A3 access • Put more emphasis on public transport • Would be good to develop train lines to the suburbs (Merrow/Burpham) • The vision is one of growth with no regard to connect communities or sustainability. No view of the faulty infrastructure/ traffic etc • If "Themes" is part of this question then much of this material is doubtful. Eg while there may be peak hour overcrowding on train [infrastructure]. This is not within the competence of the Guildford Local Plan, but is a regional or national issue in the hand of Department for Transport • The proposed infrastructure improvements show little insight of current issues or vision on how these might be addressed • Hindhead Tunnel style bypass required for town centre • Radical realistic approach of siting schools near park and ride facilities • Need long term flood defences - more thought should be paid to sites that flood • Housing, schools and transport need to work together • Greater focus on buses and green transport 	<p>The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure to support the planned development which is expected to place extra pressure on existing infrastructure, or to need new or improved infrastructure. The IDP will be updated as further detail on supporting infrastructure is available. Developer contributions and other funding sources will be used to ensure that key infrastructure is delivered when it is needed, including at the planning application stage.</p> <p>The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'. Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Transport Strategy and IDP may therefore be updated to include these. As planning applications are considered for the sites identified in the new Local Plan, additional transport schemes to address site access and other localised issues may be secured</p>
<p>Road infrastructure/ congestion /transport:</p> <ul style="list-style-type: none"> • Need Road/Traffic studies • Evidence/ backing from Railtrack/SWT/Highways Agency • How will the necessary infrastructure projects be provided – cost of providing requisite infrastructure will be enormous • The University's development will ensure that supporting infrastructure 	<p>The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission</p>

needs are included.	Local Plan: strategy and sites'. Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Transport Strategy and IDP may therefore be updated to include these. As planning applications are considered for the sites identified in the new Local Plan, additional transport schemes to address site access and other localised issues may be secured.
<p>Quantum and type of development:</p> <ul style="list-style-type: none"> • There is too much development and not enough thought about the current population - population pressure needs to be addressed • Balance is not even. Puts developers first & not the existing population. • Smaller areas of development over wider area/ expand villages • Development would ruin the countryside character of much of the borough. Proposals seek to urbanize many villages. Ruin the historic heritage • The vision depicts a bleak future with scarcer facilities, more built-up areas, consequent social degradation, and greater traffic congestion. • The vision seems mainly intent on inflicting communities with unwanted housing and industrial developments • Opposed to high-rise development • There is an opportunity to improve Guildford as a visitor destination • The opportunity to make better use of Guildford's riverside • Maintain character and minimize impact on town • Require new developments to contribute towards making environmentally sustainable places. • Proper independent and unbiased needs and impact assessments for each new development required • Additional land supply/site allocations • Developers must provide the required amount of affordable houses 	<p>Our vision and strategic objectives outline the place we want the borough to be in 2033. The housing and employment targets contained within the Plan are informed by our objectively assessed need for each. These have been derived from the West Surrey Strategic Housing Market Assessment (SHMA) and the Employment Land Needs Assessment. Further detail regarding our objectively assessed needs are provided in Appendix C: Evidence Base.</p> <p>Other chapters of the Plan highlight how we will accommodate our objectively assessed need through the development of a small number of strategic sites and the controlled realignment of the green belt. Points regarding development in our existing villages and the realignment of the green belt are responded to in tables for policy 9 and 10.</p> <p>Whilst the vision and strategic objectives highlight the Council's ambition to meet our objectively assessed needs, they also emphasise our intention to protect and enhance the borough's special heritage and natural landscape so that Guildford remains an attractive place for people to live, work and visit in.</p> <p>Requirements placed on developers will be outlined within the relevant policies of the Strategy and Sites document and the forthcoming 'Development Management Policies' DPD.</p>
<p>University:</p> <ul style="list-style-type: none"> • Policies to reflect the impact of the University on the town • Should be a clear strategy for the University campuses • Should be a clear analysis showing what capacity exists for development on the two campuses 	Comments not specifically related to the vision and strategic objectives of the Local Plan. However, the issues relating to the University are addressed in greater detail in responses to comments on Policy 3 and in 'Proposed Submission Local Plan: strategy and sites' policy H1. The Manor Park Masterplan sets out the approach to implementing the outline planning permission at the Manor Park campus.
<p>Green Belt</p> <ul style="list-style-type: none"> • Too much Green Belt destroyed • No building on Green Belt • Consideration needs to be given to wider settlement boundaries around those settlements being inset from the green belt. • Object to insetting 	Comments not specifically related to the vision and strategic objectives of the Local Plan. However, concerns and queries relating to the Green Belt are responded to in detail in the response table for Policy 9 and 10.
Brownfield sites:	The vision and strategic objectives outline that the Council will seek to protect our

<ul style="list-style-type: none"> • Clear plans/ assessment to use brownfield sites first 	natural environment and direct development towards the most sustainable locations. Where possible, development will be encouraged on brownfield sites.
<p>Sustainability/environment:</p> <ul style="list-style-type: none"> • Nobody wants this, the draft local plan is unsustainable • Add an environment that is truly sustainable, with generous public green space • The local plan opens the door for wholesale destruction of the environment. • Information on planning, design and standards for local outdoor space 	The vision and strategic objectives emphasise that the Council will seek to meet our objectively assessed needs whilst conserving our special natural and built environment. The Local Plan seeks to achieve this through a controlled realignment of the Green Belt boundary and the development of a small number of strategic sites. This is considered to be the most sustainable and appropriate approach for the growth of our borough.
<p>Population:</p> <ul style="list-style-type: none"> • We cannot cope with any further impulse of people in the Surrey area • The issues we face are overcrowding and infrastructure problems. These should be addressed first before seeking to increase the local population further • Vulnerable communities should be included - accessibility for all needs to be considered in all plans/ designs 	The planned growth of the borough outlined in the plan is based on our objectively assessed need. The vision and strategic objectives emphasise that the planned growth will be supported by enhancements to, and the provision of new, infrastructure and will not be detrimental to our special natural landscapes. The strategic objectives and vision also outline the Council's intention to provide opportunities for betterment to all residents and to ensure that development is of a high quality design.
<p>Conformity with NPPF:</p> <ul style="list-style-type: none"> • A vision for the borough must be in conformity with the NPPF and the principle of sustainable development – stronger emphasis needed on environmental and social concerns • We will become a feeder town for London. This is not in accordance with NPPF policy. 	The vision and strategic objectives of the 'Proposed Submission Local Plan: strategy and sites' outline the Council's ambition for developing an economically, environmentally and socially sustainable borough. We will meet our objectively assessed needs whilst protecting and conserving our special natural landscapes. The vision and strategic objectives of the plan are considered to comply with the principle in favour of sustainable development promoted by the NPPF and the NPPF as a whole.
<p>Structure/wording:</p> <ul style="list-style-type: none"> • There needs to be a clear set of strategic objectives, not merely generalised heading • Lack of appreciation of the main objectives.. Overkill in rural areas in order to meet these aims will destroy many areas • Produce a coherent policy and not piecemeal development as at present - faster plan is necessary • The plan is a patchwork of mostly housing developments; the vision is loose with no relation to Guildford 	The vision chapter has been amended since the 'Draft Local Plan: strategy and sites' so that it now contains a clear set of strategic objectives. The vision and objectives are specific to Guildford and relevant to the planned growth of the borough. They cover a wide range of themes and are considered to provide a comprehensive framework for the rest of the plan.
<p>Consultation:</p> <ul style="list-style-type: none"> • The local population has not been adequately consulted or informed • Not heeding local residents views • Local views have been overlooked or ignored – need to be more inclusive 	Comments not specifically related to the Vision Chapter of the Local Plan. However, the public have been consulted on two previous stages of the Plan making process and the comments received have been utilised to revise the Draft Local Plan. These amendments are reflected in the 'Proposed Submission Local Plan: strategy and sites'.
The option for the local electorate to veto the draft Local Plan through a referendum	Comment not specifically related to the Vision of the Local Plan.
<p>Evidence base:</p> <ul style="list-style-type: none"> • Doubts over evidence base • Need accurate population figures 	Comments not specifically related to the Vision Chapter of the Local Plan. However, queries relating to the evidence base are addressed in the table for Appendix C: Evidence Base. Similarly, concerns regarding the duty to co-operate and the facts

<ul style="list-style-type: none">• The plan should be flexible and performed in stages and then need reassessed after each stage• No sign of cooperation with mole valley district council	and figures contained within the plan are answered in the response tables for national guidance and chapter two.
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Draft

Comments on Policy 1: Presumption in favour of sustainable development

Issue	Guildford Borough Council Response
<p>NPPF Should be pursued as a whole instead of copying and pasting one policy.</p> <ul style="list-style-type: none"> • Guildford draft Plan embraces priorities that are unbalanced in their emphasis on economic expansion at the expense of environmental and social objectives. • “empowering local people to shape their surroundings” 	<p>Policy S1 of the ‘Proposed Submission Local Plan: strategy and sites’ reflects the principle of sustainable development running through the NPPF and adopts model wording suggested.</p> <p>The Proposed Submission Local Plan aims to balance the economic, environmental and social needs of the borough.</p>
<p>Support the adoption of the current draft of the local plan as many of its policies support these particular groups which I know will be important to our Borough in the future</p>	<p>Comment noted</p>
<p>Policy and monitoring do not sufficiently cover and make explicit the “sustainable” part of sustainable development. Without reference to sustainability this policy is effectively a “Positive and efficient planning policy”.</p> <ul style="list-style-type: none"> • Current monitoring indicators only focuses on number of houses, and does take into account the sustainable part of sustainable development. Need to monitor economic, social and environmental aspect to ensure the policy is being applied correctly. Unsuitably built houses should not indicate the success of this policy. • Infrastructure monitoring • For clarity, Policy should make explicit the specific policies within NPPF that restrict development and thus adherence to this policy. For example, those policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion. • The presumption in favour of development does not apply on the green belt • IUCN definition of sustainable development • Building on the green belt is not sustainable 	<p>The NPPF (page 2) draws on the UN General Assembly definition of sustainable development. This is therefore the most appropriate definition to use in a planning document. Policy S1 does not restate this definition, as there is no benefit in simply restating national guidance.</p> <p>The plan will be read as a whole and policy S1 (presumption in favour of sustainable development) will be read alongside the other policies in the plan. Policy I4 Green and Blue Infrastructure provides protection for areas that carry environmental designations. Policy P2 provides specific protection for the Thames Basin Heaths SPA and policy D2 requires sustainable design, construction and development. The plan as a whole directs development to sustainable locations.</p> <p>It is not agreed that building on the Green Belt is unsustainable in every circumstance. For example, previously developed sites in the Green Belt and sites near sustainable transport hubs and services can be considered sustainable locations for development.</p>
<p>Plans and decisions need to take local circumstances into account so that they respond to the different opportunities for achieving sustainable development in different areas“.</p>	<p>The ‘Proposed Submission Local Plan: strategy and sites’ largely sets out policies that deal with strategic matters. Local circumstances are largely considered during the planning application stage.</p> <p>The plan as a whole directs development to the most sustainable locations. Potential development sites have been assessed against their local circumstances. Other policies in the plan also set out criteria for considering development proposals against local circumstances, for example opportunities for low and zero carbon energy (policy D2) and environmental designations that should apply (policy I4).</p>
<p>University of Surrey is over developing</p> <ul style="list-style-type: none"> • Enough students congesting the stations 	<p>The University of Surrey already has outline planning permission for their development at Manor Park. They are only expected to work within this permission. Planning has no remit over who uses the stations.</p>
<p>Key evidence is “Development control performance statistics” – GBC Planning in</p>	<p>The Proposed Submission Local Plan does not list key evidence relating to this</p>

Issue	Guildford Borough Council Response
<p>early 2014 (under FOI request) were unable to demonstrate statistically which planning conditions were being enforced on individual sites and had no historic records to indicate compliance of any planning conditions – This would suggest the claimed key evidence does not, at this time, exist.</p>	<p>policy.</p>
<p>The definition of what is sustainable should be based on core principles</p>	<p>Sustainability is assessed according to the objectives in our Sustainability Appraisal.</p>
<p>Policy opens the door for “first bird gets the worm” mentality when the second bird might be better. More considered comprehensive plan-led development is preferable and would lead to more productive, effective and efficient use of land.</p>	<p>We have considered all reasonable alternative spatial strategy and site options in the Sustainability Appraisal.</p>
<p>Support the policy</p> <ul style="list-style-type: none"> • GBC’s proactive approach in considering development proposals, aligning them with the NPPF’s ‘presumption in favour of sustainable development’ and working with applicants (this commitment needs to be used positively at ground level in the decision making process when determining planning applications) • Agree brownfield sites should be developed first, as long there’s a clear commitment to and plan of how to deliver infrastructure to support the new developments. • welcome the suggestion of small-scale developments providing affordable homes and feel every village in the borough should have this opportunity. • presumption in favour is sensible as the need for homes is high with an aging population, more separations and society having children • give high priority to helping local businesses grow • Support the principles adopted to ensure sustainable development (Policy 1) • small-scale developments providing affordable homes and feel every village in the borough should have this opportunity • this commitment does need to be used positively at ground level in the decision making process when determining planning applications • Enterprise M3 Planning Charter which seeks to ensure that planning applicants and Local Planning Authorities can work together efficiently and effectively • This is of particular importance to residential development in light of the Government’s objective to provide to 240,000 additional homes per year by 2016. Within Guildford, a key development policy necessary to achieve the Council’s aim to provide of a higher quantum of housing supply to meet what has been an historic under-supply of housing. In the case of Manor Farm we are located adjacent to a proposed ‘SANG’ and within 5-10 minutes walk of a range of local services. • the principle of sustainability includes three key considerations: these are environmental, economic and social sustainability. All three need to be 	<p>Comments noted.</p>

Issue	Guildford Borough Council Response
<p>balanced and this should be made clear throughout the draft plan.</p> <ul style="list-style-type: none"> the requirements of the Duty to Cooperate have been fulfilled, we would request that this information be published as soon as possible to allow a judgement on the levels of 'cooperation' as a priority 	
<p>Support the policy but have concerns over the:</p> <ul style="list-style-type: none"> Deliverability of infrastructure how the current infrastructure deficit can be remedied what infrastructure is necessary to deliver development evidence base the desire of the borough to grow may be seen to be in conflict with the environmental focus of many of the draft Plan policies 	<p>Planned development, both the strategic sites and the cumulative impact of smaller sites, will place extra pressure on existing infrastructure and will need new or improved infrastructure.</p> <p>The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure to needed support this planned housing.</p> <p>The IDP will be updated as further detail is available. Developer contributions (including the "pooled" Community Infrastructure Levy), planning contributions and other funding sources will be used to ensure that key supporting infrastructure is delivered to be available when it is needed.</p>
<ul style="list-style-type: none"> If there is a presumption in favour of development the Local Plan must also state how that development is to be delivered. The draft does not suggest how the current infrastructure deficit can be remedied nor does it suggest exactly what infrastructure is necessary to deliver development in the major areas proposed for development. Development proposals must address infrastructure robustly. Assessment of the ability of local infrastructure to cope with increased development should have a high priority. The extent of the need for it properly demonstrated. Need for concrete proposals to enhance the infrastructure to cope with any new building. Failure to assess whether your proposals are genuinely sustainable and how they will impact on the quality of life of existing residents. for development in the villages, transportation and utility infrastructure are the key components – most journeys will be by car as bus transport is derisory roads already highly congested at peak times, will become grid locked, impact of traffic noise , pollution and delays, risks to cyclists are already high and the bus service is wholly inadequate new homes will cause our greatly ailing infrastructure to implode The Council has failed to consider the infrastructure issues when drawing up this Local Plan, and hence the Plan is incomplete and ill thought through Both the Local Plan and Strategic Vision should be supported by an ambitious, phased Infrastructure Investment Plan, The Strategic Vision should address the factors impeding the sustainable development of Guildford's high added value 	<p>Planned development, both the strategic sites and the cumulative impact of smaller sites, will place extra pressure on existing infrastructure and will need new or improved infrastructure.</p> <p>The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure needed to support this planned housing.</p> <p>The IDP will be updated as further detail is available. Developer contributions (including the "pooled" Community Infrastructure Levy), planning contributions and other funding sources will be used to ensure that key supporting infrastructure is delivered to be available when it is needed.</p>

Issue	Guildford Borough Council Response
<p>economy, improve the quality of life for residents and arise from a community focused process involving Residents' Associations, Guildford needs to tackle the significant challenges it faces rather than allow ever more piecemeal development without adequate assessment of cumulative impact or contributions to necessary investment.</p> <ul style="list-style-type: none"> • The nature of the recent flooding and the need to avoid key areas for development to ensure appropriate protection against flooding highlights the need to make reference to this restriction here • Section 2 (Key facts about the borough) disseminating the business impacts of the lack of infrastructure improvements and the impact that this has upon the borough's competitiveness. Indeed this is a key priority in relation to the Slyfield Industrial Estate and the principal reason for the Council seeking to implement a strategic link road providing a second access in to the Industrial Estate. 	
<p>Support the building of "community hubs" in sizeable settlements. Such buildings provide a one-stop place for people to access council services, see their GPs, begin adult education course and access IT and library services. They would help provide a strong community focus – especially in new settlements like the proposed Wisley airfield site – and offer local people educational and health opportunities on their doorstep. e.g Slough</p>	<p>The 'Proposed Submission Local Plan: strategy and sites' includes proposals for new community buildings at the planned strategic sites, alongside new local centres.</p>
<p>Object to the policy</p>	<p>Comment noted.</p>
<p>Little notice taken of public's voice of opposition to the original draft local plan</p>	<p>Previous consultation responses have been taken into account.</p>
<p>Sustainable definition</p> <ul style="list-style-type: none"> • is not adequately defined in terms that make sense to community. Base definition of sustainability on core principles. • By definition 'Sustainable' in itself means: hold up, keep from falling or sinking, enable to last out, keep from failure, endure without giving way, stand, bear up against, court – give decision in favour of, bear out, keep going continuously (Concise Oxford Dictionary fifth edition reprint) • What is meant by sustainability? Are there constraints? Have these still to be defined in development control documents? Does it apply only to sites listed in the Local Plan? Will the council be able to resist poorly designed developments under this policy? • Sustainability wording agreed internationally by the United Nations General Assembly. To do this would require : <ul style="list-style-type: none"> • 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 (ie not just growth) 	<p>Sustainable development is defined in the NPPF on page 2. The Council has decided not to repeat this definition in policy S1 as there is a general presumption against repeating national policy. The NPPF sets out the generally accepted international definition of sustainable development (adopted by the UN) and this is the most appropriate definition for a planning document.</p> <p>The plan, if adopted, will become part of the development plan for the borough and will apply to all developments, not just those listed in the plan. The plan must be read as a whole and constraints on development are presented in other policies. This includes policies D1 to D4 which set out policy and guidance on design standards.</p> <p>The Council acknowledges the meaning of sustainable development and the aims in the five bullets. The 'Proposed Submission Local Plan: strategy and sites' aims to balance competing needs and deliver the most sustainable outcome across the three dimensions of sustainable development (social, environmental and economic). There will sometimes be conflict between these dimensions and in those cases the Local Plan seeks to deliver a balanced outcome.</p>

Issue	Guildford Borough Council Response
<ul style="list-style-type: none"> • Promoting good governance (working with the community) • Using sound science responsibly <p>This is a wholly integrated package which includes community engagement for Guildford, an inclusive society, applying Green Belt policy, and affording the highest protection to Areas of Outstanding Natural Beauty (AONB) and adjacent AGLV land.</p> <ul style="list-style-type: none"> • This Local Plan does not follow the UK Sustainable Development Strategy 2005 in regard to 'Living within environmental limits'. The sustainability appraisal is not complete. The requirement of NPPF para 165 has not been met • sustainability refers to our infrastructure including land to farm for healthy home grown produce and habitat, from where I'm coming from, refers to countryside and nature reserves • Sustainability" in the words of Greg Clark (MP) in the foreword to the NPPF means: "...ensuring better lives for ourselves doesn't mean worse lives for future generations. GBC totally ignores this aspect 	<p>The aim of "living within environmental limits" must be balanced with the other aims. The Local Plan seeks to deliver a balanced outcome.</p> <p>NPPF paragraph 165 is met: the plan is based on up-to-date information, Policy 14 (a significant update to reg. 18 policy 19) in particular is based on up-to-date information about the natural environment, including River Basin Management Plans, and incorporates a strategic approach developed by the Surrey Nature Partnership. Sustainability Appraisal has been embedded into the process and has resulted in significant changes to the plan (for example, the inclusion of a bespoke SPA policy following a recommendation in the SA).</p>
<p>Overlooks the NPPF:</p> <ul style="list-style-type: none"> • plans and decisions need to take local circumstances into account so that they respond to the different opportunities for achieving sustainable development in different areas (para10) • 12 core principles – At least half have not been fully implemented and communities are dissatisfied with the process and do not feel empowered – this has been borne out by a survey of Guildford Parish Councils and Parish based Residents' Associations. http://www.guildfordparishforum.co.uk • It is in breach of NPPF 119 which states "the presumption in favour of sustainable development does not apply where development requiring assessment under the Birds or Habitats directive is being considered, planned or determined". • It is in breach of NPPF 17 which outlines 12 core principles which should underline the plan e.g. "Be genuinely plan-led, empowering local people to shape their surroundings..." "Actively manage patterns of growth to make the fullest use of public transport..." • take account of the different roles and character of different areas including Green Belt • presumption in favour of sustainable development does not apply where specific policies indicate that development should be restricted including land designated as Green Belt • support the transition to a low carbon future • contribute to conserving and enhancing the natural environment and reducing pollution 	<p>This policy is based on guidance within NPPF paragraph 14 and adopts Communities and Local Government model wording.</p>

Issue	Guildford Borough Council Response
<ul style="list-style-type: none"> • encourage the effective use of land by reusing land that has been previously developed (brownfield land) provided it is not of high environmental value (use for housing before retail or office as working and shopping habits are changing) • conserve heritage assets in a manner appropriate to their significance • actively manage patterns of growth to make the fullest possible use of public transport walking and cycling and focus significant development on locations which can be made sustainable • The presumption in favour of sustainable development (para 14) does not apply where development requiring appropriate assessment under the Birds or Habitats Directives is being considered, planned or determined (para 119) • policy conflicts with Planning Practice guidelines which were published to clarify the meaning of “the presumption in favour of sustainable development” in the NPPF and in Policy 4.1 of the GDLP. For example in para 7 of the guidance:” <i>(there is a) need for the planning system to perform... an environmental role contributing to protecting and enhancing our natural, built and historic environment and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution... “Para 8. “... environmental gains should be sought... through the planning system. “Para 9. “...sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment as well as people’s quality of life...moving from a net loss of biodiversity to achieving net gains for nature.”</i> • For Burpham residents “adverse impacts” (para 14) of the DLP “would significantly and demonstrably outweigh the benefits.” • Policy has ignored the following key requirements from paragraph 17 of the NPPF: <i>“take account of the different roles and character of different areas, promoting the vitality of our urban areas, protecting the Green Belts around them” “recognising the intrinsic character and beauty of the countryside and supporting thriving communities within it” “contribute to conserving and enhancing the natural environment and reducing pollution“ “encourage the effective use of land by reusing land that has been previously developed (brownfield land) provided it is not of high environmental value” “conserve heritage assets in a manner appropriate to their significance“ “actively manage patterns of growth to make the fullest possible use of public transport walking and cycling and focus significant development on locations which can be made sustainable“.“empowering local people to shape their surroundings”</i> • This policy is incomplete and misleading. Policies should be written with 	<p style="text-align: center; opacity: 0.5; font-size: 48px; font-weight: bold;">Draft</p>

Issue	Guildford Borough Council Response
<p>the intention of being enforceable for the life of the plan.</p> <ul style="list-style-type: none"> • Ignoring NPPF invalidates plan. This policy has not be written with the intention of being enforceable for the life of the plan. • NPPF 14 “specific policies in this framework indicate development should be restricted” [e.g. sites protected by the Birds and Habitats Directive, land designated SSSI/AONB/Green belt, locations at risk of flooding etc • The policy needs to specify constraints that apply such as environmental considerations, e.g. AONB and Thames Basin Heaths SPA. • The policy states that development applications will be ‘approved wherever possible’ regardless of sustainability. NPPF 14 notes that policies within the framework may require development to be restricted. The draft Plan should therefore not imply that development applications will be approved whatever their merits. Policy 1 fails to distinguish between presumption in favour of sustainable development and a presumption in favour of any development at all • In accordance with the NPPF, development on the Green Belt must only be in exceptional circumstances and to my mind these have yet to be adequately proved • communities are dissatisfied with the process and do not feel empowered 	
<p>Sustainable development</p> <ul style="list-style-type: none"> • The plan does not understand the concept of sustainable development. Ensure that development is sustainable. The draft plan contains all the possible options and impacts without joining these together into a sustainable plan. • The presumption in favour of sustainable development gives far too much power to developers. • Revise policy so it recognises that there is no presumption in favour of sustainable development in the Green Belt • Some of your criteria for what constitutes ‘sustainability’ are laughable • Planning applications must consider policies in neighbourhood plans as well as material considerations looking at the impact as a whole • The only sustainable development is that which increases the long-term survivability of the inhabitants of the borough which precludes any development on green-belt and agricultural land. • “sustainability” means an obligation to pass on things which we currently enjoy to the next generation undiminished and untarnished. It is therefore unsustainable to develop in Green Belt areas or to re-draw the boundaries of the Green Belt so that villages fall outside its protection. 	<p>We have assessed all reasonable spatial strategy and site options through the Sustainability Appraisal process in terms of various issues/objectives, and in doing so we are able to understand the pros and cons of each. It is inevitably the case that there are likely to be ‘trade-offs’ between competing objectives). Informed by SA, consultation responses and technical evidence, we consider that our plan strikes a balance between these objectives and delivers a sustainable outcome.</p> <p>Our spatial strategy is discussed further in the Housing Delivery topic paper. Comments relating to the green belt are further addressed in the table for policy 10.</p> <p>Site specific comments are addressed in the table ‘Planning for sites’.</p>

Issue	Guildford Borough Council Response
<ul style="list-style-type: none"> • By virtue of Approved Document “L” of the Building Regulations complying new homes to meet Code 3 (and soon Code 4) of the code for sustainable homes means that every new house will effectively be “sustainable”. So the presumption that an “Eco home” should be given planning permission because it is sustainable is abject nonsense, and just creates a “Developers Charter”. • Even though the individual houses may be sustainable the wholesale of introduction of development sites into the Green Belt villages is not. The overloading of the infrastructure is not sustainable and the proposal to increase the amount of housing in West Horsley by 44% is the antithesis of sustainability and contrary to the Council’s policy and will not improve the economic social and environment of Horsley or any other village. It is unsustainable to build the majority of all new housing on the Eastern side of the Borough whilst locating the majority of all new business development on the Western side of the Borough. • On what basis does the statement of the principle in favour of sustainable development lead to the conclusion that this gives GBC the basis for inseting villages? Swallowing up many hectares of green belt land, swamping the existing settlement and removing the consequent openness that villages (eg West Horsley) enjoy is not sustainable. • the definition of sustainable development as given In the National Planning Policy Framework leaves too much room for local interpretation • Rural development is unsustainable. The economic factors seem to greatly outweigh the environmental impact. • Sustainable plans need to take account of the dynamic effects that the policies themselves may have; eg increased demand. Restriction may be required to avoid unintended consequences. • GBC must embrace a wider vision of how we develop without compromising Guildford for future generations. This will include: <ul style="list-style-type: none"> • Deciding what are our irreplaceable assets • Ensuring that character, community identity and distinctive architecture and design 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. • strain and dire uncertainty of our infrastructure, while the work is in progress – road closures and diversions everywhere 	<p style="text-align: center; font-size: 48px; opacity: 0.3; transform: rotate(-45deg);">Draft</p>

Issue	Guildford Borough Council Response
<ul style="list-style-type: none"> • increased flood risk, causing more potholes and subsidence which could lead to sinkholes because the less natural earth we have left for rain and river spate water to drain off into the greater the flooding on our roads and in our towns, villages and housing estates, as well as ruining crop fields unto reduced crop yields, reduced yields of healthy home grown produce on account of farmland being turned into housing • how does earmarking all those 13-15 villages for ‘release’ from the greenbelt to allow all this housing support promise to look at brownfield sites first? • It is a legal requirement of the planning system that local plans should seek to deliver sustainable development. This requirement is also set out in the NPPF. • Housing needs to be located in accessible locations where appropriate provision has or can be been made for employment, shops, community facilities and open space. Patterns of development and additional travel are therefore important. • uses accurate figures on proposed housing need, ensure development is within Brownfield land before considering Green Belt and makes sure that all developments are truly sustainable • Countryside is an ideal space for the health and well-being of growing families. Building on Green Belt can never be sustainable 	
<p>Object to the presumption in favour of sustainable development and its impact on:</p> <ul style="list-style-type: none"> • the local area, visual and recreational amenity • infrastructure deficits • transportation, roads (poor road maintenance) (lack of capacity on local road system and trunk roads including the A3), existing crowded trains and other public transport capacity • drainage • flooding • sewerage capacity • lack of state primary and secondary school capacity, • insufficient local dental and medical facilities • lack of capacity • loss of agricultural land • negative impact of wildlife • destruction of the Green Belt • pressure on all services <p>“Sustainable” is simply taken to mean “commercially viable”. The Policy suggests</p>	<p>This policy is based on guidance within the National Planning Policy Framework paragraph 14 and adopts Communities and Local Government model wording.</p>

Issue	Guildford Borough Council Response
<p>the early release of “safeguarded” land for development. This is not a defence of the public interest against private speculators – it is a developer’s charter.</p>	
<p>Housing number is unsustainable</p> <ul style="list-style-type: none"> • The increase in housing/expanding settlements/new settlements will impact on already crowded infrastructure, existing flooding and drainage problems and the shortage of school places and is unsustainable. • Housing number is too high • SHMA –which the full council required to be amended- has not taken place. A new, revised, SHMA on a joint basis with Woking and Waverley has not yet been published and is not part of the evidence base. How can an objective and defensible consultation be held when the critical factor – the fundamental housing number is still so uncertain • Guildford’s future housing requirements has been peculiarly inept. For “Issues and Options”= interim housing number of 322, 2014 Draft Plan = 650 (or 750 • The figure quoted is incorrect and has not been revised despite Office of National Statistics data. This policy pursued wholesale will become a developers charter and will strain infrastructure to destruction. Hardly a ‘sustainable’ solution. 	<p>These comments have been responded to in Appendix C: Evidence Base</p>
<p>Economy</p> <ul style="list-style-type: none"> • no proven need for 14,800 more jobs in the borough. Much is made of sustainability, expanding the workforce on this scale is not sustainable. • not sustainable local jobs to support this proposed increased to our local population, and that people will have longer and more expensive commutes to their place of work, or that investors will continue to buy up housing stock • Without explaining the nature of economic and social change this section is seriously flawed. Failure to take into account the economic revolution which made Guildford a knowledge based economy is flaw which needs to be rectified. • grabbing of farmland for housing. The UK has the lowest food security in the western developed world and it is estimated in a recent Cambridge study that more than 35% of the UK’s existing agricultural land will be needed by 2030 to support the needs of a population of 70M. The UK, in addition, must become more self- sufficient as the population in the world obviously continues to grow too creating more competition for food. Where is this land going to be found to feed future generations if GCC appease greedy developers now and 	<p>The floorspace figures in the Reg 19 Local Plan are based on the Employment Lands Needs Assessment which was published in September 2015 produced by consultants AECOM. It is available to view on the Council’s website. It seeks to meet the need for 3,200 additional B class jobs.</p> <p>The level of new employment floorspace has been calculated from the need generated by the anticipated growth in jobs. It is based on the Objectively Assessed Need (OAN) and not aspirational growth. The need has been assessed by consultants AECOM who produced the Employment Land Needs Assessment (ELNA), published in September 2015. The mean average of three economic forecasts of the number of employees in the borough. AECOM then translated this into the need for floorspace using historic trends.</p> <p>The Guildford Local Plan is required by the NPPF to promote sustainable development through the balancing of social, environmental and economic considerations to achieve the best overall outcome. This is done through assessing the Local Plan documents at each stage of their preparation to consider potential social, environmental and economic impacts. This process, and the resulting report is called Sustainability Appraisal (SA).</p> <p>SA incorporates Strategic Environmental Assessment (SEA) which is also required by law. SEA assesses potential significant environmental impacts of the plan being prepared, and where needed may recommend mitigation measures.</p>

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	The sustainability appraisal (SA), incorporating the strategic environmental assessment (SEA), and a non-technical summary of the SA, which accompanied the Draft Local Plan strategy and sites 2014 can be viewed on the Council's website. A further SA of the proposed submission Local Plan: strategy and sites will be published on the website to accompany the main document.
<p>Ecology</p> <ul style="list-style-type: none"> Concerned about maintaining an ecological balance, the effect of building on the land and the negative effect on our habitat EVERY possible alternative must be explored before GB – including demolition of existing sites in order to create visually appealing multi storey dwellings. Cost must not be a prohibitive factor. We will never have the opportunity to take back the land. The local plan must look at the whole picture this policy means the continued urban sprawl on the Green Belt, with the resulting loss of biodiversity and abundance of species 	<p>Local Plans must deliver net gains in biodiversity, as well as balance the needs of the environment against other competing needs (like the need for housing and employment). Policy I4 Green and Blue Infrastructure has been substantially enhanced in order to protect important habitats and deliver improvements in biodiversity and green and blue infrastructure.</p> <p>We have sought to maximise brownfield development which is at the top of our spatial hierarchy however there is insufficient land to meet our objectively assessed housing needs.</p> <p>Comments related to the Green Belt have been responded to in the table for Policy 10</p>
<p>Design</p> <ul style="list-style-type: none"> More savvy design in our development plans Why are we not thinking outside the box in term of how we build? Housing that is greener, that has a lighter footprint, more compact housing, more flats, communal gardens, parks, MORE ALLOTMENTS or Community Supported Agriculture. More shared car schemes, more facilities for cyclists to help reduce pollution and perhaps some of the anticipated traffic overload. 	Design will be addressed in greater detail in our Development Management document. The 'Proposed Submission Local Plan: strategy and sites' contains strategic policies on Making Better Places and Sustainable transport for new developments. There are two site allocations for allotments (A21 and A31).
<p>Gardens</p> <ul style="list-style-type: none"> No explicit direction for residential gardens a.k.a. "garden grabbing" has been included under this policy, as suggested by NPPF 53, unless the Council is intentionally allowing this. 	Development proposals on private residential gardens will be considered against policy D4 Development in Urban Areas and Inset Villages, and all relevant planning policies and material planning considerations. Development of private residential gardens may be appropriate and has historically contributed towards housing supply.
<p>Policy approach</p> <ul style="list-style-type: none"> Insufficient rigor in this policy – relies on satisfying Policy 7 for sustainable development which requires developers to use measures that are "...practical and viable". The Building Regulations already have specific requirements for sustainability which are 'practical and viable' so ANY development proposal would have to meet Building Regulations standards and would be acceptable under Policy 1 and Policy 7. Policy is naïve, constitutes a developers charter and abdicates the obligation of the council to control development Too much detail seems to have been left until a time when consultation is 	Comments responded to in the table for policy 7.

Issue	Guildford Borough Council Response
<p>past or is only in a very preliminary draft form, based on questionable data</p> <ul style="list-style-type: none"> • Policy is far too pro development. See the Reigate & Banstead Plan approach which states that “It will work proactively with applicants to secure development that improves the economic, social and environmental conditions in the area” rather than the section about working “proactively with applicants jointly to find solutions that mean that proposals can be approved wherever possible”. • Plans should not be rushed through, the buildings have to be lived with for decades. • Danger that the Guildford draft Plan will embrace priorities which are unbalanced in their emphasis on economic expansion at the expense of environmental and social objectives. • Illogical to put this as the number Policy when it must surely only be relevant when other considerations have been met. • The policy should outline the general position on the increase in housing necessary and the plan to make sure the infrastructure is in place to maintain the additional development. The lack of detail and clarification only emphasizes the obvious, which is to eliminate the greenbelt in favour of development. The question of what we want our community to look like and how we are going to achieve it is not addressed. The policy should uphold long-established Green Belt boundaries and protections, setting a sound and defensible parameter to future planning decisions. • Support in principle but object in the context of poor Evidence Base – its inadequate to support such a presumption as it is not possible to determine what development would be sustainable • State how that development is to be delivered • The draft does not suggest how the current infrastructure deficit can be remedied nor does it suggest exactly what infrastructure is necessary to deliver development in the major areas proposed for development. So far as Merrow is concerned this criticism is directed at the proposed development of Gosden Hill Farm • wording of this policy does not indicate that all the sustainable development requirements of the NPPF will have to be accounted for in the preparation of planning applications in a way that truly provides developments of highly sustainable quality • work to develop a sustainable plan properly underpinned with accurate facts – revise the housing number, and to amend the Local Plan to utilise brownfield/previously used land rather than green field sites – of which there are significant amounts within the Borough • It is important that the policy is not simply perceived as a ‘bolt on’. Instead 	<p style="text-align: center; opacity: 0.5; font-size: 48px; transform: rotate(-45deg);">Draft</p>

Issue	Guildford Borough Council Response
<p>the presumption and need for a positively prepared plan should run throughout, notably in respect of housing delivery, infrastructure planning and sustainability.</p> <ul style="list-style-type: none"> • Brownfield sites should be developed first, as long there's infrastructure to support the new developments, especially in congested areas in the town centre • The presumption in favour of such huge 'sustainable growth' is overstated and seems to risk leading to over development in a borough already constricted by the downs and the valley. The do less or nothing options don't appear to have been considered in any real seriousness. Guildford is already a successful, attractive and well proportioned town, proposed development can only change its character for the worse. • This Plan does not show sustainable development • The various designations of international, national, regional and local land use restrictions (such as SPAs, AONB, Green Belt, Sites of Special Scientific Interest, Areas of Great Landscape Value (subject to any future redesignation) and Conservation Areas) are not highlighted in the context of Policy 1 • University plays a major role in supporting innovation and competitiveness and makes positive contribution to UK's economic and social development. University recognises the need to be able to attract people with skills and talent to support its evolving role. Blackwell Farm includes employment land plus new homes close to existing and proposed employment. Blackwell Farm will provide resources for University to reinvest in its activities in Guildford. • All previously developed land in borough is not necessarily in most sustainable locations. Sustainable locations should include urban extensions to Guildford in preference to inset villages. Expansion of town is more sustainable approach (cf village expansion and Wisley airfield) Suggest rewording policy 	<p style="text-align: center; opacity: 0.5; font-size: 48px; font-weight: bold;">Draft</p>
<p>Policy wording</p> <ul style="list-style-type: none"> • We suggest that the current third paragraph is deleted as there should be an up to date plan once this is approved so the paragraph will be irrelevant. We suggest a new paragraph 3 which states that proposed developments which conflict with the Development Plan will be refused. • This policy should set out guidelines that restrict development such as Birds and Habitats Directive, SSI, Green belt and Areas of Natural Beauty. • revise the wording of this policy so that it is quite clear that it is the policies in the NPPF as they stand, in combination with the Local Plan policies, that 	<p>The policy adopts model wording. Material considerations are generally defined by case law.</p>

Issue	Guildford Borough Council Response
<p>need to be adhered to. This is particularly important as in some cases the Local Plan policies are out of alignment themselves with the NPPF/NPPG as in the case of Policy 8</p> <ul style="list-style-type: none"> • Policies should be written with the intention of being enforceable for the life of the plan. • This policy is incomplete and misleading. • This policy does not show the intention of being enforceable for the life of the Plan • A policy that presumes approval for development in all circumstances is completely unacceptable. The Policy must make it absolutely clear that there will be a presumption in favour of approval in defined areas, and that in protected areas there will be a presumption against development except in exceptional circumstances. There should be a presumption against development in the Green Belt • The constraints are not clearly set out and are not identified as restrictions by default (subject to the various tests required by NPPF) • The infrastructure restrictions (notably the severe deficits in historic infrastructure provision) are not articulated • The policy states that development applications will be approved wherever possible' regardless of sustainability. NPPF 14 notes that policies within the framework may require development to be restricted. The draft Plan should therefore not imply that development applications will be approved whatever their merits. Policy 1 fails to distinguish between presumption in favour of sustainable development and a presumption in favour of any development at all. Of the 12 core principles set out in NPPF 17, Policy 1 seems to be disregarding at least 7 of these. These core principles must be taken into account in order to meet the requirement to comply with NPPF 17. • The generality of this section, briefly described as it appears, seems to contradict National Planning Policies • this policy is too prescriptive and may not give sufficient weight to local circumstances and local opinions. Secondly, the policy should not be worded in such a way as to make the Council slavishly follow it in a dogmatic fashion • The first two lines should state "When considering development proposals we will take a positive approach that reflects as far as possible the presumption in favour of sustainable development contained in the National Planning Policy Framework." The third paragraph consists of one sentence 77 words long and it is more difficult to understand than it needs to be. • You should be aiming for sentences of no more than 21 words 	<p style="text-align: center; opacity: 0.5; font-size: 48px; font-weight: bold;">Draft</p>

Issue	Guildford Borough Council Response
<ul style="list-style-type: none"> • third paragraph, line 3, "...indicate otherwise. The Council will take into account whether any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits. Any adverse impacts will be assessed against the policies in the National Planning Policy Framework taken as a whole. The Council will also take into account specific policies in that Framework which indicate that development should be restricted • Delete the words..." and the policy above follows the model wording suggested." There should be no need in a local plan, to follow the exact 'model wording' of central government • revise the wording of this policy so that it is quite clear that it is the policies in the NPPF as they stand, in combination with the Local Plan policies, that need to be adhered to • no explanation of what considerations might be regarded as "material" inconsidering planning application or how "adverse impacts" and "benefits" would be weighed • Paragraph 4 of this policy, which states, "Planning applications that accord with the policies in this draft Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise," should be extended to include, not just Local Plan policies, but other Government/European policies, for example those set out in the National Planning Policy Framework (NPPF), the Habitats Directive eg Policy 8 does not follow the National Planning Policy Guidance (N PPG) 	
<p>Green Belt</p> <ul style="list-style-type: none"> • no mention of Green Belt in the policy yet almost 90% of the land in the borough is such. • It is protected specifically to preserve the individual nature of towns and villages and prevent the urbanisation of those with a rural nature. Yet it is exactly this which is being proposed in this Plan for several of the Borough villages • Paragraph 4 of this policy should be extended to include other Government/European policies, eg those set out in NPPF, the Habitats Directive etc. It should be noted that not all of the policies in this draft Local Plan accord with national policy • No mention of the Green Belt, despite the fact that this covers nine-tenths of the borough and is Britain's biggest contribution to Sustainable Development ever instituted 	<p>The Local Plan must be read as a whole. There is a separate policy (P2) which seeks to protect Green Belt.</p>
<p>Monitoring</p> <ul style="list-style-type: none"> • don't show how many homes have been delivered as not what the people 	<p>Policy S1 of the Proposed Submission Local Plan: strategy and sites does not include any monitoring indicators because it is not considered that the success of</p>

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<p>living in the borough want</p> <ul style="list-style-type: none"> • should include flooding, new and existing properties • no monitoring is proposed for reductions in growth estimates and the effect this would have on housing or employment land and this is an omission. • no monitoring is proposed for the cumulative effect of development and this is an omission • Similarly monitoring the numbers of properties or amount of development or employment land that is delivered demonstrates a predilection for development at the expense of the environment. Monitoring of delivered infrastructure and impact on environment must be included. • Monitoring of this policy seems to relate primarily to land use for housing and commercial development. Sustainability in the NPPF covers economic, social and environmental indicators. • Allow for adjustment of the housing target should parameters change • The review should also include an assessment of local infrastructure and its ability to cope with development; and the environmental and ecological impacts of development [impact assessment] • An environmental impact assessment of new development to check that this was as planned • Reductions in targeted housing and employment land if new demographic and other studies indicate lower growth than forecast. • A form of monitoring indicator is developed that records the sustainability credentials of all approved developments against which the quality and not just the quantity of sustainable developments can be assessed. This will allow the Council and the public to evaluate whether presumption is actually being given to development that can legitimately be described as sustainable and therefore whether this policy is being applied in the spirit for which it is intended. • inclusion of indicators outlining how the presumption is to be monitored is welcomed. What is important is that sustainable sites are approved without delay, as required by NPPF Paragraph 14 • the Monitoring Indicators section of Policy 1 fail to recognise the combined influences on each other of housing, employment and infrastructure. • First paragraph "For each policy, there is a summary delivery strategy, monitoring and review indicators." Do you mean strategy or procedure? The grammar in this sentence is not good. Why not say "For each policy, there is a summary delivery strategy. There are also monitoring and review indicators." Regarding line 6 in paragraph 3, "safeguarded sites" should be changed for clarity to "safeguarded future development sites." 	<p>the policy can be quantitatively measured.</p>

Issue	Guildford Borough Council Response
<ul style="list-style-type: none"> • Policy 8 (see below).We suggest that a form of monitoring indicator is developed that records the sustainability credentials of all approved developments against which the quality and not just the quantity of sustainable developments can be assessed. This will allow the Council and the public to evaluate whether presumption is actually being given to development that can legitimately be described as sustainable and therefore whether this policy is being applied in the spirit for which it is intended • the monitoring criteria reveal that they are more interested in development taking place rather than whether it is "sustainable" in my understanding of the word • Local Plan review - We believe that this review should also include an assessment of local infrastructure and its ability to cope with development, and environmental impact assessment. 	
<p>Evidence Base</p> <ul style="list-style-type: none"> • “Evidence base” documents (that ostensibly support draft Local Plan – but which are in fact often deeply flawed) attempt (often incorrectly) to record precise low-level details of proposed development sites, with the aim of generating mechanistic numerical measures that are apparently intended to magically produce the “right” answer. This is no substitute for competent fundamental thinking, and it is very unlikely to result in the goal that <i>“sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system”</i> (NPPF 8). • Plan is constructed on a naïve and out-of-date population projection. G L Hearn’s projection (that was used to generate the housing figure in the Local Plan) was based on ONS mid-year figures for 2011, instead of the considerably lower ONS SNPP 2012 projection that was published on 29th May 2014. It also used a simple flat profile for migration for the entire period until 2031 (see Figure 1). • population projections underlying the plan are out of date and the methodology underlying them is flawed • The current draft Local Plan is not fit for purpose. It cannot be considered to be sustainable until the process used to develop the Plan itself takes full account of the points below • The gross difference between the mechanistic procedures used to produce the evidence base documents, and the essentially human judgements needed to balance the economic, social and environmental gains required by NPPF: 1. Up-to-date data (as per NPPF 158).2. Sensitivity studies on projections or forecasts to quantify the impacts of future uncertainty on the 	<p>The Evidence Base has been refreshed following the previous consultation on the Draft Local Plan and is considered to be up-to-date and robust. The Evidence Base will be scrutinised by the Planning Inspector at the EIP and used to determine whether the plan is sound. Further comments relating to the Evidence Base are addressed in the table for appendix C.</p>

Issue	Guildford Borough Council Response
<p>Plan.3. Periodic formal checkpoints to allow future uncertainty to be recognised and managed effectively within the Plan itself</p> <ul style="list-style-type: none"> • The Evidence Base is inadequate to support such a presumption as it is not possible to determine what development would be sustainable. Equally, the lack of integration between housing, employment and infrastructure needs is at best unhelpful in this regard. • the Evidence Base is not good enough to provide a framework for testing sustainability, and the Sustainability Appraisal ('SA') has flaws identified in response to the SA consultation. • The Evidence Base should be kept under regular review in addition to the developments and infrastructure completed in each year of the Plan. Policy is based on the need to provide 13,040 homes - this is flawed – doesn't account for constraints, inadequate infrastructure, not based on the latest ONS figures, re-use of office buildings for residential, Government policy to reduce international migration, fails to require Surrey University to house its own students it proposes 'insetting' 16 out of 24 villages in the Borough and identifying a few very large areas of land to be 'safeguarded' without presenting the 'very special circumstances' 	
<p>Horsleys</p> <ul style="list-style-type: none"> • These plans and decisions have not taken local circumstances into account and have placed an unreasonable development burden in the areas of East and West Horsley that would totally change the character of these rural villages. • Object to inseting • inseting of West Horsley North and South does not appear to comply with the overarching ethos of the NPPF. 	<p>These comments have been responded to in the table for Planning for Sites</p>
<p>Wisley</p> <ul style="list-style-type: none"> • Shops and school provided 'if' enough children – not sustainable • Surrounding villages will suffer from increase to traffic from 'sustainable' new town, pollution, delays, B367 Newark Lane too narrow • Would overshadow Ockham • Gridlock Ripley without full junctions to A3 • GBC is not meeting its legal duty to deliver sustainable development by promoting the new settlement option at Wisley. The SA is an important component in forming a judgment on this issue and WAG considers it is inadequate and that more sustainable alternatives exist for development 	<p>These comments have been responded to in the table for Planning for Sites</p>
<p>Normandy</p> <ul style="list-style-type: none"> • proposed major expansion of the village not sustainable • no shops • a surgery working at near maximum capacity 	<p>We are planning the infrastructure to support this planned strategic development. This includes the expansion of Wyke primary school, a new secondary school, and improvements to the railway line serving Westborough station.</p>

Issue	Guildford Borough Council Response
<ul style="list-style-type: none"> • a primary school which is over subscribed • Flexford end of the village has a minimal bus service 	
Effingham <ul style="list-style-type: none"> • During the wars, food was even grown on Effingham Common, a lifesaver in different circumstances. Incidentally and sadly, GBC wish to build a car park even on it. 	The Thames Basin Heaths Special Protection Area Avoidance Strategy supports the delivery of a small parking (six spaces) area to improve access to Effingham Common. The Council is considering a number of options and it is not considered preferable to deliver one on the common.
Ockham <ul style="list-style-type: none"> • Local plan for this village is not sustainable. Presumption in favour of sustainable development needs to be tempered by the social, economic and environmental constraints as required by the NPPF • requires development to work inside the limitations of land which is not Green Belt designated. The NPPF accepts the permanence of Green Belt and doesn't permit unlawful development except in exceptional circumstances. • local plan disregards the restrictions on Green Belt development by threatening to remove 15 out of 24 villages from the Green Belt. Inset agricultural land, commonage, SPA protected land and SSSI sites are all included for development. Exceptional Circumstances have not been shown. • What happens in 2031? – Development demand will once have gone up! When the bank of assets is depleted, who will sustain all these people who still need houses that don't flood, food, clean water? Why is 'climate change' strategy not GBC's primary policy. Numbers of bees are falling at alarming rates 	These comments have been responded to in the table for Policy 10
Planning principles - should be applied to underpin both plan-making and decision-taking and so these should be taken into account in the framing and the administering of the Local Plan. This has not been done leading to an unreasonable proposal and breach of the principles.	The 'Proposed Submission Local Plan: strategy and sites' is considered to reflect the principle of sustainable development and conform with the NPPF and NPPG.
Neighbourhood Plans - Planning applications must consider policies in neighbourhood plans as well as material considerations looking at the impact as a whole.	Comment not relevant to the Local Plan-making process. In determining planning applications, the Council will have regard to the Development Plan (including adopted and emerging Neighbourhood Plans).
Self Build <ul style="list-style-type: none"> • <i>"We urgently need to build more homes and now is the time for councils to act and earmark areas that encourage people to buy a plot of land and get a builder to build them a home."</i>The above comments from the Planning Minister, at the time of comment, clearly outlines how the government intended LPA to respond to the requirements set out in the NPPF when drawing up new Local Plans. Councils should take a proactive position to providing land and should undertake rigorous and effective evidence gathering to measure custom and self build need in their districts. National 	The Self-build and Custom Housebuilding Act 2015 requires Local Planning Authorities to set up and publicise a self-build register by April 1 st 2016. The Council have met this duty and will have regard to it in its future planning, housing, regeneration and disposal functions. The interest in self-build is acknowledged in the reasoned justification of Policy H1 paragraph 4.2.12 of the 'Proposed Submission Local Plan: strategy and sites' and some of the strategic site allocations.

Issue	Guildford Borough Council Response
<p>Custom & Self Build Association</p> <ul style="list-style-type: none"> Requirement of NPPF to plan for <i>people wishing to build their own homes</i>" 	
<p>Process</p> <p>We ask GBC to lead the process and be inclusive. It should be a joined up, borough-wide exercise not just focused on the town centre, research park and Slyfield. We suggest strong, long term community partnership will be needed. The Strategic Vision should encompass matters not under GBC's direct control. Wider partners with a pivotal role should be involved from the outset.</p> <p>ACTIONS:</p> <ol style="list-style-type: none"> 1. Set up effective mechanisms for working more closely with the community to shape Guildford's future. 2. Prepare a longer term Strategic Vision, with full public engagement, for the town and surrounding villages. 3. Press ahead with producing a robust Local Plan to overcome vulnerabilities to inappropriate development and shape any initiatives pursued under the Localism Act, engaging with the community throughout working to a clear and meaningful consultation programme. 4. Identify any sites that need safeguarding to prevent development that would impede subsequent construction of critical infrastructure (eg road bridge over railway, space for rail link to Heathrow, cross Guildford road link). 5. Ensure all developers contribute to new infrastructure. Break down long term aspirations into bite sized chunks of work that can be costed and funded using mechanisms such as Community Infrastructure Levy. 6. Encourage businesses to strengthen their links with the community and make greater provision for their traffic and parking impact. 7. Plan for the economic opportunities of the future. Heed changes in retailing and do not assume retail-led development will resume with economic recovery. 	<p>The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure to needed support this planned housing. The IDP will be updated as further detail is available. Developer contributions (including the "pooled" Community Infrastructure Levy), planning contributions and other funding sources will be used to ensure that key supporting infrastructure is delivered to be available when it is needed.</p> <p>The floorspace figures in the Reg 19 Local Plan are based on the Employment Lands Needs Assessment (ELNA) which was published in September 2015, produced by consultants AECOM. It identifies the need for 3,200 additional B class jobs which has been calculated from an average of three employee forecasts. AECOM then translated this into the need for floorspace using historic trends which will take into account the growth of homeworking. The ELNA takes into account B class jobs and does not include any other sectors including retail.</p> <p>The Retail and Leisure Update Study 2014 assesses the need for retail, food and drink floorspace and leisure needs over the plan period to serve the growing population, whilst retaining consistent market share.</p>
<p>NPPF says SPA, green belt, SSSI's, heritage sites and conservation areas are excluded from presumption in favour of development</p>	<p>These comments have been responded to in the table for Planning for Sites</p>

Issue	Guildford Borough Council Response
<p>All of Ockham and the former Wisley airfield are within 800 m of the SPA protected, much of it lying inside the 400m protected zone, and the green belt. The SSSI of Ockham Common is also in the former Wisley airfield site.</p> <p>There are 29 grade 1 and grade 2 listed buildings in Ockham, several are within 10m of the proposed new town in the heart of Ockham.</p> <p>Parts of the Ockham conservation area are within 100 meters of the site</p> <p><i>Object to GBCs failure to examine the bigger picture, regarding the long-term sustainability of Thames Basin SPA. GBC have other choices than to build near SPA</i></p> <p>The 1987 United Nations Brundtland report definition of Sustainable development is: 'Development that meets the needs of the present without compromising the ability of future generations to meet their own needs.'</p>	

Comments on Policy 2 Planning for the borough – our spatial development strategy

Issue	Guildford Borough Council Response
<p>NPPF Should be pursued as a whole instead of copying and pasting one policy.</p> <ul style="list-style-type: none"> • Guildford draft Plan embraces priorities that are unbalanced in their emphasis on economic expansion at the expense of environmental and social objectives. <p>“empowering local people to shape their surroundings”</p>	<p>Policy S1 of the ‘Proposed Submission Local Plan: strategy and sites’ reflects the principle of sustainable development running through the NPPF and adopts model wording suggested.</p> <p>The ‘Proposed Submission Local Plan: strategy and sites’ aims to balance the economic, environmental and social needs of the borough.</p>
<p>Support the adoption of the current draft of the local plan as many of its policies support these particular groups which I know will be important to our borough in the future</p>	<p>Comment noted</p>
<p>Policy and monitoring do not sufficiently cover and make explicit the “sustainable” part of sustainable development. Without reference to sustainability this policy is effectively a “Positive and efficient planning policy”.</p> <ul style="list-style-type: none"> • Current monitoring indicators only focuses on number of houses, and does take into account the sustainable part of sustainable development. Need to monitor economic, social and environmental aspect to ensure the policy is being applied correctly. Unsuitably built houses should not indicate the success of this policy. • Infrastructure monitoring • For clarity, Policy should make explicit the specific policies within NPPF that restrict development and thus adherence to this policy. For example, those policies relating to sites protected under the Birds and Habitats Directives 	<p>The NPPF (page 2) draws on the UN General Assembly definition of sustainable development. This is therefore the most appropriate definition to use in a planning document. Policy S1 does not restate this definition, as there is no benefit in simply restating national guidance.</p> <p>The plan will be read as a whole and Policy S1 (presumption in favour of sustainable development) will be read alongside the other policies in the plan. Policy I4 Green and Blue Infrastructure provides protection for areas that carry environmental designations. Policy P2 provides specific protection for the Thames Basin Heaths SPA and policy D2 requires sustainable design, construction and development. The plan as a whole directs development to sustainable locations.</p>

<p>and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion.</p> <ul style="list-style-type: none"> • The presumption in favour of development does not apply on the Green Belt • IUCN definition of sustainable development <p>Building on the green belt is not sustainable</p>	<p>It is not agreed that building on the Green Belt is unsustainable in every circumstance. For example, previously developed sites in the Green Belt and sites near sustainable transport hubs and services can be considered sustainable locations for development.</p>
<p>Plans and decisions need to take local circumstances into account so that they respond to the different opportunities for achieving sustainable development in different areas“.</p>	<p>The ‘Proposed Submission Local Plan: strategy and sites’ largely sets out policies that deal with strategic matters. Local circumstances are largely considered during the planning application stage.</p> <p>The plan as a whole directs development to the most sustainable locations. Potential development sites have been assessed against their local circumstances. Other policies in the plan also set out criteria for considering development proposals against local circumstances, for example opportunities for low and zero carbon energy (Policy D2) and environmental designations that should apply (Policy I4).</p>
<p>University of Surrey is over developing Enough students congesting the stations</p>	<p>The University of Surrey already has outline planning permission for their development at Manor Park. They are only expected to work within this permission. Planning has no remit over who uses the stations.</p>
<p>SUPPORT The definition of what is sustainable should be based on core principles Policy opens the door for “first bird gets the worm” mentality when the second bird might be better. More considered comprehensive plan-led development is preferable and would lead to more productive, effective and efficient use of land.</p>	<p>Sustainability is assessed according to the objectives in our Sustainability Appraisal. We have considered all reasonable alternative spatial strategy and site options in the Sustainability Appraisal.</p>
<p>Support the policy</p> <ul style="list-style-type: none"> • GBC’s proactive approach in considering development proposals, aligning them with the NPPF’s ‘presumption in favour of sustainable development’ and working with applicants (this commitment needs to be used positively at ground level in the decision making process when determining planning applications) • Agree brownfield sites should be developed first, as long as there is a clear commitment to and plan of how to deliver infrastructure to support the new developments. • Welcome the suggestion of small-scale developments providing affordable homes and feel every village in the borough should have this opportunity. • Presumption in favour is sensible as the need for homes is high with an aging population, more separations and society having children • Give high priority to helping local businesses grow • Support the principles adopted to ensure sustainable development (Policy 1) • Small-scale developments providing affordable homes and feel every 	<p>Support noted</p>

<p>village in the borough should have this opportunity</p> <ul style="list-style-type: none"> • This commitment does need to be used positively at ground level in the decision making process when determining planning applications • Enterprise M3 Planning Charter which seeks to ensure that planning applicants and Local Planning Authorities can work together efficiently and effectively • This is of particular importance to residential development in light of the Government's objective to provide to 240,000 additional homes per year by 2016. Within Guildford, a key development policy necessary to achieve the Council's aim to provide of a higher quantum of housing supply to meet what has been an historic under-supply of housing. In the case of Manor Farm we are located adjacent to a proposed 'SANG' and within 5-10 minutes walk of a range of local services. • The principle of sustainability includes three key considerations: these are environmental, economic and social sustainability. All three need to be balanced and this should be made clear throughout the draft plan. <p>The requirements of the Duty to Cooperate have been fulfilled, we would request that this information be published as soon as possible to allow a judgement on the levels of 'cooperation' as a priority</p>	
<p>Support the policy but have concerns over the:</p> <ul style="list-style-type: none"> • Deliverability of infrastructure • how the current infrastructure deficit can be remedied • what infrastructure is necessary to deliver development • evidence base • the desire of the borough to grow may be seen to be in conflict with the environmental focus of many of the draft Plan policies 	<p>Planned development, both the strategic sites and the cumulative impact of smaller sites, will place extra pressure on existing infrastructure and will need new or improved infrastructure.</p> <p>The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure to needed support this planned housing.</p> <p>The IDP will be updated as further detail is available. Developer contributions (including the "pooled" Community Infrastructure Levy), planning contributions and other funding sources will be used to ensure that key supporting infrastructure is delivered to be available when it is needed.</p>
<ul style="list-style-type: none"> • If there is a presumption in favour of development the Local Plan must also state how that development is to be delivered. • The draft does not suggest how the current infrastructure deficit can be remedied nor does it suggest exactly what infrastructure is necessary to deliver development in the major areas proposed for development. Development proposals must address infrastructure robustly. • Assessment of the ability of local infrastructure to cope with increased development should have a high priority. The extent of the need for it properly demonstrated. • Need for concrete proposals to enhance the infrastructure to cope with any new building. 	<p>Planned development, both the strategic sites and the cumulative impact of smaller sites, will place extra pressure on existing infrastructure and will need new or improved infrastructure.</p> <p>The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure needed to support this planned housing.</p> <p>The IDP will be updated as further detail is available. Developer contributions (including the "pooled" Community Infrastructure Levy), planning contributions and other funding sources will be used to ensure that key supporting infrastructure is delivered to be available when it is needed.</p>

<ul style="list-style-type: none"> • Failure to assess whether your proposals are genuinely sustainable and how they will impact on the quality of life of existing residents. • for development in the villages, transportation and utility infrastructure are the key components – most journeys will be by car as bus transport is derisory • roads already highly congested at peak times, will become grid locked, impact of traffic noise , pollution and delays, risks to cyclists are already high and the bus service is wholly inadequate • new homes will cause our greatly ailing infrastructure to implode • The Council has failed to consider the infrastructure issues when drawing up this Local Plan, and hence the Plan is incomplete and ill thought through • Both the Local Plan and Strategic Vision should be supported by an ambitious, phased Infrastructure Investment Plan, The Strategic Vision should address the factors impeding the sustainable development of Guildford’s high added value economy, improve the quality of life for residents and arise from a community focused process involving Residents’ Associations, Guildford needs to tackle the significant challenges it faces rather than allow ever more piecemeal development without adequate assessment of cumulative impact or contributions to necessary investment. • The nature of the recent flooding and the need to avoid key areas for development to ensure appropriate protection against flooding highlights the need to make reference to this restriction here • Section 2 (Key facts about the borough) disseminating the business impacts of the lack of infrastructure improvements and the impact that this has upon the borough’s competitiveness. Indeed this is a key priority in relation to the Slyfield Industrial Estate and the principal reason for the Council seeking to implement a strategic link road providing a second access in to the Industrial Estate. 	<p style="text-align: center; opacity: 0.5; font-size: 48px; font-weight: bold;">Draft</p>
<p>Support the building of “community hubs” in sizeable settlements. Such buildings provide a one-stop place for people to access council services, see their GPs, begin adult education course and access IT and library services. They would help provide a strong community focus – especially in new settlements like the proposed Wisley airfield site – and offer local people educational and health opportunities on their doorstep. e.g Slough</p>	<p>The ‘Proposed Submission Local Plan: strategy and sites’ includes proposals for new community buildings at the planned strategic sites, alongside new local centres.</p>
<p>Object to the policy</p>	<p>Comment noted.</p>
<p>Little notice taken of public’s voice of opposition to the original draft local plan</p>	<p>Previous consultation responses have been taken into account.</p>
<p>Sustainable definition</p> <ul style="list-style-type: none"> • is not adequately defined in terms that make sense to community. Base definition of sustainability on core principles. • By definition ‘Sustainable’ in itself means: hold up, keep from falling or 	<p>Sustainable development is defined in the NPPF on page 2. The Council has decided not to repeat this definition in policy S1 as there is a general presumption against repeating national policy. The NPPF sets out the generally accepted international definition of sustainable development (adopted by the UN) and this is</p>

<p>sinking, enable to last out, keep from failure, endure without giving way, stand, bear up against, court – give decision in favour of, bear out, keep going continuously (Concise Oxford Dictionary fifth edition reprint)</p> <ul style="list-style-type: none"> • What is meant by sustainability? Are there constraints? Have these still to be defined in development control documents? Does it apply only to sites listed in the Local Plan? Will the council be able to resist poorly designed developments under this policy? • Sustainability wording agreed internationally by the United Nations General Assembly. To do this would require : <ul style="list-style-type: none"> • 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 (ie not just growth) • Promoting good governance (working with the community) • Using sound science responsibly • This is a wholly integrated package which includes community engagement for Guildford, an inclusive society, applying Green Belt policy, and affording the highest protection to Areas of Outstanding Natural Beauty (AONB) and adjacent AGLV land. • This Local Plan does not follow the UK Sustainable Development Strategy 2005 in regard to ‘Living within environmental limits’. The sustainability appraisal is not complete. The requirement of NPPF para 165 has not been met • sustainability refers to our infrastructure including land to farm for healthy home grown produce and habitat, from where I’m coming from, refers to countryside and nature reserves <p>Sustainability” in the words of Greg Clark (MP) in the foreword to the NPPF means: “.....ensuring better lives for ourselves doesn’t mean worse lives for future generations. GBC totally ignores this aspect</p>	<p>the most appropriate definition for a planning document.</p> <p>The plan, if adopted, will become part of the development plan for the borough and will apply to all developments, not just those listed in the plan. The plan must be read as a whole and constraints on development are presented in other policies. This includes policies D1 to D4 which set out policy and guidance on design standards.</p> <p>The Council acknowledges the meaning of sustainable development and the aims in the five bullets. The ‘Proposed Submission Local Plan: strategy and sites’ aims to balance competing needs and deliver the most sustainable outcome across the three dimensions of sustainable development (social, environmental and economic). There will sometimes be conflict between these dimensions and in those cases the Local Plan seeks to deliver a balanced outcome.</p> <p>The aim of “living within environmental limits” must be balanced with the other aims. The Local Plan seeks to deliver a balanced outcome.</p> <p>NPPF paragraph 165 is met: the plan is based on up-to-date information, Policy 14 (a significant update to draft Local Plan policy 19) in particular is based on up-to-date information about the natural environment, including River Basin Management Plans, and incorporates a strategic approach developed by the Surrey Nature Partnership. Sustainability Appraisal has been embedded into the process and has resulted in significant changes to the plan (for example, the inclusion of a bespoke SPA policy following a recommendation in the SA).</p>
<p>Overlooks the NPPF:</p> <ul style="list-style-type: none"> • plans and decisions need to take local circumstances into account so that they respond to the different opportunities for achieving sustainable development in different areas (para10) • 12 core principles – At least half have not been fully implemented and communities are dissatisfied with the process and do not feel empowered – this has been borne out by a survey of Guildford Parish Councils and Parish based Residents’ Associations. http://www.guildfordparishforum.co.uk • It is in breach of NPPF 119 which states “the presumption in favour of sustainable development does not apply where development requiring 	<p>Policy S1 of the ‘Proposed Submission Local Plan: strategy and sites’ is based on guidance within NPPF paragraph 14 and adopts Communities and Local Government model wording.</p>

assessment under the Birds or Habitats directive is being considered, planned or determined”.

- It is in breach of NPPF 17 which outlines 12 core principles which should underline the plan e.g. “Be genuinely plan-led, empowering local people to shape their surroundings...” “Actively manage patterns of growth to make the fullest use of public transport...”
- take account of the different roles and character of different areas including Green Belt
- presumption in favour of sustainable development does not apply where specific policies indicate that development should be restricted including land designated as Green Belt
- support the transition to a low carbon future
- contribute to conserving and enhancing the natural environment and reducing pollution
- encourage the effective use of land by reusing land that has been previously developed (brownfield land) provided it is not of high environmental value (use for housing before retail or office as working and shopping habits are changing)
- conserve heritage assets in a manner appropriate to their significance
- actively manage patterns of growth to make the fullest possible use of public transport walking and cycling and focus significant development on locations which can be made sustainable
- The presumption in favour of sustainable development (para 14) does not apply where development requiring appropriate assessment under the Birds or Habitats Directives is being considered, planned or determined (para 119)
- Policy conflicts with Planning Practice guidelines.
- in favour of sustainable development and a presumption in favour of any development at all
- In accordance with the NPPF, development on the Green Belt must only be in exceptional circumstances and to my mind these have yet to be adequately proved
- communities are dissatisfied with the process and do not feel empowered historic environment as well as people’s quality of life...moving from a net loss of biodiversity to achieving net gains for nature.”
- For Burpham residents “adverse impacts” (para 14) of the DLP “would significantly and demonstrably outweigh the benefits.”
- policy has totally ignored key requirements from paragraph 17 of the NPPF
- This policy is incomplete and misleading. Policies should be written with the intention of being enforceable for the life of the plan.
- Ignoring NPPF invalidates plan. This policy has not be written with the

<p>intention of being enforceable for the life of the plan.</p> <ul style="list-style-type: none"> • NPPF 14 “specific policies in this framework indicate development should be restricted” [e.g. sites protected by the Birds and Habitats Directive, land designated SSSI/AONB/Green belt, locations at risk of flooding etc • The policy needs to specify constraints that apply such as environmental considerations, e.g.AONB and Thames Basin Heaths SPA • The policy states that development applications will be ‘approved wherever possible’ regardless of sustainability. NPPF 14 notes that policies within the framework may require development to be restricted. The draft Plan should therefore not imply that development applications will be approved whatever their merits. 	
<p>Sustainable development</p> <ul style="list-style-type: none"> • The plan does not understand the concept of sustainable development. Ensure that development is sustainable. The draft plan contains all the possible options and impacts without joining these together into a sustainable plan. • The presumption in favour of sustainable development gives far too much power to developers. • Revise policy so it recognises that there is no presumption in favour of sustainable development in the Green Belt • Some of your criteria for what constitutes ‘sustainability’ are laughable • Planning applications must consider policies in neighbourhood plans as well as material considerations looking at the impact as a whole • The only sustainable development is that which increases the long-term survivability of the inhabitants of the borough which precludes any development on green-belt and agricultural land. • “sustainability” means an obligation to pass on things which we currently enjoy to the next generation undiminished and untarnished. It is therefore unsustainable to develop in Green Belt areas or to re-draw the boundaries of the Green Belt so that villages fall outside its protection. • By virtue of Approved Document “L” of the Building Regulations complying new homes to meet Code 3 (and soon Code 4) of the code for sustainable homes means that every new house will effectively be “sustainable”. So the presumption that an “Eco home” should be given planning permission because it is sustainable is abject nonsense, and just creates a “Developers Charter”. • Even though the individual houses may be sustainable the wholesale of introduction of development sites into the Green Belt villages is not. The overloading of the infrastructure is not sustainable and the proposal to increase the amount of housing in West Horsley by 44% is the antithesis of 	<p>We have assessed all reasonable spatial strategy and site options through the Sustainability Appraisal process in terms of various issues/objectives, and in doing so we are able to understand the benefits and disadvantages of each. It is inevitably the case that there are likely to be ‘trade-offs’ between competing objectives. Informed by Sustainability Appraisal, consultation responses and technical evidence, we consider that our plan strikes a balance between these objectives and delivers a sustainable outcome.</p>

sustainability and contrary to the Council's policy and will not improve the economic social and environment of Horsley or any other village. It is unsustainable to build the majority of all new housing on the Eastern side of the borough whilst locating the majority of all new business development on the Western side of the borough

- On what basis does the statement of the principle in favour of sustainable development lead to the conclusion that this gives GBC the basis for inseting villages? Swallowing up many hectares of green belt land, swamping the existing settlement and removing the consequent openness that villages (eg West Horsley) enjoy is not sustainable.
- the definition of sustainable development as given In the National Planning Policy Framework leaves too much room for local interpretation
- Rural development is unsustainable. The economic factors seem to greatly outweigh the environmental impact.
- Sustainable plans need to take account of the dynamic effects that the policies themselves may have; eg increased demand. Restriction may be required to avoid unintended consequences.
- GBC must embrace a wider vision of how we develop without compromising Guildford for future generations. This will include:
 - Deciding what are our irreplaceable assets
 - Ensuring that character, community identity and distinctive architecture and design 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.
- strain and dire uncertainty of our infrastructure, while the work is in progress – road closures and diversions everywhere
- increased flood risk, causing more potholes and subsidence which could lead to sinkholes because the less natural earth we have left for rain and river spate water to drain off into the greater the flooding on our roads and in our towns, villages and housing estates, as well as ruining crop fields unto reduced crop yields, reduced yields of healthy home grown produce on account of farmland being turned into housing
- how does earmarking all those 13-15 villages for 'release' from the greenbelt to allow all this housing support promise to look at brownfield sites first?
- It is a legal requirement of the planning system that local plans should seek to deliver sustainable development. This requirement is also set out in the

Our spatial strategy is discussed further in the Housing Delivery topic paper. Comments relating to the green belt are further addressed in the table for policy 10.

Site specific comments are addressed in the table 'Planning for sites'.

<p>NPPF.</p> <ul style="list-style-type: none"> • . Housing needs to be located in accessible locations where appropriate provision has or can be been made for employment, shops, community facilities and open space. Patterns of development and additional travel are therefore important. • uses accurate figures on proposed housing need, ensure development is within Brownfield land before considering Green Belt and makes sure that all developments are truly sustainable • Countryside is an ideal space for the health and well-being of growing families. Building on Green Belt can never be sustainable 	
<p>Object to the presumption in favour of sustainable development and its impact on:</p> <ul style="list-style-type: none"> • the local area, visual and recreational amenity • infrastructure deficits • transportation, roads (poor road maintenance) (lack of capacity on local road system and trunk roads including the A3), existing crowded trains and other public transport capacity • drainage • flooding • sewerage capacity • lack of state primary and secondary school capacity, • insufficient local dental and medical facilities • lack of capacity • loss of agricultural land • negative impact of wildlife • destruction of the Green Belt • pressure on all services <p>“Sustainable” is simply taken to mean “commercially viable”. The Policy suggests the early release of “safeguarded” land for development. This is not a defence of the public interest against private speculators – it is a developer’s charter.</p>	<p>This policy is based on guidance within the National Planning Policy Framework paragraph 14 and adopts Communities and Local Government model wording.</p>
<p>Housing number is unsustainable</p> <ul style="list-style-type: none"> • The increase in housing/expanding settlements/new settlements will impact on already crowded infrastructure, existing flooding and drainage problems and the shortage of school places and is unsustainable. • Housing number is too high • SHMA –which the full council required to be amended- • has not taken place. A new, revised, SHMA on a joint basis with Woking and Waverley has not yet been published and is not part of the evidence base. How can an objective and defensible consultation be held when the 	<p>These comments have been responded to in the table for Appendix C: Evidence Base</p>

<p>critical factor – the fundamental housing number is still so uncertain</p> <ul style="list-style-type: none"> • Guildford’s future housing requirements has been peculiarly inept. For “Issues and Options”= interim housing number of 322, 2014 Draft Plan = 650 (or 750 <p>The figure quoted is incorrect and has not been revised despite Office of National Statistics data. This policy pursued wholesale will become a developers charter and will strain infrastructure to destruction. Hardly a ‘sustainable’ solution.</p>	
<p>Economy</p> <ul style="list-style-type: none"> • no proven need for 14,800 more jobs in the borough. Much is made of sustainability, expanding the workforce on this scale is not sustainable. • not sustainable local jobs to support this proposed increased to our local population, and that people will have longer and more expensive commutes to their place of work, or that investors will continue to buy up housing stock • Without explaining the nature of economic and social change this section is seriously flawed. Failure to take into account the economic revolution which made Guildford a knowledge based economy is flaw which needs to be rectified. • grabbing of farmland for housing. The UK has the lowest food security in the western developed world and it is estimated in a recent Cambridge study that more than 35% of the UK’s existing agricultural land will be needed by 2030 to support the needs of a population of 70M. The UK, in addition, must become more self- sufficient as the population in the world obviously continues to grow too creating more competition for food. Where is this land going to be found to feed future generations if GCC appease greedy developers now and 	<p>The floorspace figures in the ‘Proposed Submission Local Plan: strategy and sites’ are based on the Employment Lands Needs Assessment (ELNA) which was published in September 2015 produced by consultants AECOM. It is available to view on the Council’s website. It seeks to meet the need for 3,200 additional B class jobs.</p> <p>The level of new employment floorspace has been calculated from the need generated by the anticipated growth in jobs. It is based on the Objectively Assessed Need (OAN) and not aspirational growth. The need has been assessed by AECOM in the ELNA. The mean average of three economic forecasts of the number of employees in the borough. AECOM then translated this into the need for floorspace using historic trends.</p> <p>The Guildford Local Plan is required by the NPPF to promote sustainable development through the balancing of social, environmental and economic considerations to achieve the best overall outcome. This is done through assessing the Local Plan documents at each stage of their preparation to consider potential social, environmental and economic impacts. This process, and the resulting report is called Sustainability Appraisal (SA).</p> <p>SA incorporates Strategic Environmental Assessment (SEA) which is also required by law. SEA assesses potential significant environmental impacts of the plan being prepared, and where needed may recommend mitigation measures.</p> <p>The sustainability appraisal (SA), incorporating the strategic environmental assessment (SEA), and a non-technical summary of the SA, which accompanied the Draft Local Plan strategy and sites 2014 can be viewed on the Council’s website. A further SA of the ‘Proposed Submission Local Plan: strategy and sites’: strategy and sites will be published on the website to accompany the main document.</p>
<p>Ecology</p> <ul style="list-style-type: none"> • Concerned about maintaining an ecological balance, the effect of building on the land and the negative effect on our habitat • EVERY possible alternative must be explored before GB – including demolition of existing sites in order to create visually appealing multi storey dwellings. Cost must not be a prohibitive factor. We will never have the 	<p>Local Plans must deliver net gains in biodiversity, as well as balance the needs of the environment against other competing needs (like the need for housing and employment). Policy I4 Green and Blue Infrastructure has been substantially enhanced in order to protect important habitats and deliver improvements in biodiversity and green and blue infrastructure.</p>

<p>opportunity to take back the land. The local plan must look at the whole picture</p> <ul style="list-style-type: none"> • this policy means the continued urban sprawl on the Green Belt, with the resulting loss of biodiversity and abundance of species 	<p>We have sought to maximise brownfield development which is at the top of our spatial hierarchy however there is insufficient land to meet our objectively assessed housing needs.</p> <p>Comments specifically related to the Green Belt have been responded to in the table for Policy 10</p>
<p>Design</p> <ul style="list-style-type: none"> • More savvy design in our development plans • Why are we not thinking outside the box in term of how we build? • Housing that is greener, that has a lighter footprint, more compact housing, more flats, communal gardens, parks, more allotments or Community Supported Agriculture. <p>More shared car schemes, more facilities for cyclists to help reduce pollution and perhaps some of the anticipated traffic overload.</p>	<p>Design will be addressed in greater detail in our Development Management document. The 'Proposed Submission Local Plan: strategy and sites' contains strategic policies on Making Better Places and Sustainable transport for new developments. There are two site allocations for allotments (A21 and A31).</p>
<p>Gardens</p> <p>No explicit direction for residential gardens a.k.a. "garden grabbing" has been included under this policy, as suggested by NPPF 53, unless the Council is intentionally allowing this.</p>	<p>Development proposals on private residential gardens will be considered against Policy D4 Development in Urban Areas and Inset Villages, and all relevant planning policies and material planning considerations. Development of private residential gardens may be appropriate and has historically contributed towards housing supply.</p>
<p>Policy approach</p> <ul style="list-style-type: none"> • Insufficient rigor in this policy – relies on satisfying Policy 7 for sustainable development which requires developers to use measures that are "...practical and viable". The Building Regulations already have specific requirements for sustainability which are 'practical and viable' so ANY development proposal would have to meet Building Regulations standards and would be acceptable under Policy 1 and Policy 7. • Policy is naïve, constitutes a developers charter and abdicates the obligation of the council to control development • Too much detail seems to have been left until a time when consultation is past or is only in a very preliminary draft form, based on questionable data • Policy is far too pro development. See the Reigate & Banstead Plan approach which states that "It will work proactively with applicants to secure development that improves the economic, social and environmental conditions in the area" rather than the section about working "proactively with applicants jointly to find solutions that mean that proposals can be approved wherever possible". • Plans should not be rushed through, the buildings have to be lived with for decades. • Danger that the Guildford draft Plan will embrace priorities which are unbalanced in their emphasis on economic expansion at the expense of 	<p>Comments responded to in the table for policy 7: Sustainable design, construction and energy</p>

environmental and social objectives.

- Illogical to put this as the number Policy when it must surely only be relevant when other considerations have been met.
- The policy should outline the general position on the increase in housing necessary and the plan to make sure the infrastructure is in place to maintain the additional development. The lack of detail and clarification only emphasizes the obvious, which is to eliminate the greenbelt in favour of development. The question of what we want our community to look like and how we are going to achieve it is not addressed. The policy should uphold long-established Green Belt boundaries and protections, setting a sound and defensible parameter to future planning decisions.
- Support in principle but object in the context of poor Evidence Base – its inadequate to support such a presumption as it is not possible to determine what development would be sustainable
- State how that development is to be delivered
- The draft does not suggest how the current infrastructure deficit can be remedied nor does it suggest exactly what infrastructure is necessary to deliver development in the major areas proposed for development. So far as Merrow is concerned this criticism is directed at the proposed development of Gosden Hill Farm
- wording of this policy does not indicate that all the sustainable development requirements of the NPPF will have to be accounted for in the preparation of planning applications in a way that truly provides developments of highly sustainable quality
- work to develop a sustainable plan properly underpinned with accurate facts – revise the housing number, and to amend the Local Plan to utilise brownfield/previously used land rather than green field sites – of which there are significant amounts within the borough
- It is important that the policy is not simply perceived as a ‘bolt on’. Instead the presumption and need for a positively prepared plan should run throughout, notably in respect of housing delivery, infrastructure planning and sustainability.
- Brownfield sites should be developed first, as long there’s infrastructure to support the new developments, especially in congested areas in the town centre
- The presumption in favour of such huge ‘sustainable growth’ is over stated and seems to risk leading to over development in a borough already constricted by the downs and the valley. The do less or nothing options don’t appear to have been considered in any real seriousness. Guildford is already a successful, attractive and well proportioned town, proposed development can only change its character for the worse.

<ul style="list-style-type: none"> • This Plan does not show sustainable development • The various designations of international, national, regional and local land use restrictions (such as SPAs, AONB, Green Belt, Sites of Special Scientific Interest, Areas of Great Landscape Value (subject to any future redesignation) and Conservation Areas) are not highlighted in the context of Policy 1 • University plays a major role in supporting innovation and competitiveness and makes positive contribution to UK's economic and social development. University recognises the need to be able to attract people with skills and talent to support its evolving role. Blackwell Farm includes employment land plus new homes close to existing and proposed employment. Blackwell Farm will provide resources for University to reinvest in its activities in Guildford. • All previously developed land in borough is not necessarily in most sustainable locations. Sustainable locations should include urban extensions to Guildford in preference to inset villages. Expansion of town is more sustainable approach (cf village expansion and Wisley airfield) Suggest rewording policy 	
<p>Policy wording</p> <ul style="list-style-type: none"> • We suggest that the current third paragraph is deleted as there should be an up to date plan once this is approved so the paragraph will be irrelevant. We suggest a new paragraph 3 which states that proposed developments which conflict with the Development Plan will be refused. • This policy should set out guidelines that restrict development such as Birds and Habitats Directive, SSI, Green belt and Areas of Natural Beauty. • Revise the wording of this policy so that it is quite clear that it is the policies in the NPPF as they stand, in combination with the Local Plan policies, that need to be adhered to. This is particularly important as in some cases the Local Plan policies are out of alignment themselves with the NPPF/NPPG as in the case of Policy 8 • Policies should be written with the intention of being enforceable for the life of the plan. • This policy is incomplete and misleading. • This policy does not show the intention of being enforceable for the life of the Plan • A policy that presumes approval for development in all circumstances is completely unacceptable. The Policy must make it absolutely clear that there will be a presumption in favour of approval in defined areas, and that in protected areas there will be a presumption against development except in exceptional circumstances. There should be a presumption against development in the Green Belt 	<p>The policy adopts model wording. Material considerations are generally defined by case law.</p>

- The constraints are not clearly set out and are not identified as restrictions by default (subject to the various tests required by NPPF)
- The infrastructure restrictions (notably the severe deficits in historic infrastructure provision) are not articulated
- The policy states that development applications will be approved wherever possible' regardless of sustainability. NPPF 14 notes that policies within the framework may require development to be restricted. The draft Plan should therefore not imply that development applications will be approved whatever their merits. Policy 1 fails to distinguish between presumption in favour of sustainable development and a presumption in favour of any development at all. Of the 12 core principles set out in NPPF 17, Policy 1 seems to be disregarding at least 7 of these. These core principles must be taken into account in order to meet the requirement to comply with NPPF 17.
- The generality of this section, briefly described as it appears, seems to contradict National Planning Policies
- this policy is too prescriptive and may not give sufficient weight to local circumstances and local opinions. Secondly, the policy should not be worded in such a way as to make the Council slavishly follow it in a dogmatic fashion
- The first two lines should state "When considering development proposals we will take a positive approach that reflects as far as possible the presumption in favour of sustainable development contained in the National Planning Policy Framework." The third paragraph consists of one sentence 77 words long and it is more difficult to understand than it needs to be.
- You should be aiming for sentences of no more than 21 words
- third paragraph, line 3, "...indicate otherwise. The Council will take into account whether any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits. Any adverse impacts will be assessed against the policies in the National Planning Policy Framework taken as a whole. The Council will also take into account specific policies in that Framework which indicate that development should be restricted
- Delete the words..." and the policy above follows the model wording suggested." There should be no need in a local plan, to follow the exact 'model wording' of central government
- revise the wording of this policy so that it is quite clear that it is the policies in the NPPF as they stand, in combination with the Local Plan policies, that need to be adhered to
- no explanation of what considerations might be regarded as "material" inconsidering planning application or how "adverse impacts" and "benefits"

<p>would be weighed</p> <ul style="list-style-type: none"> • Paragraph 4 of this policy, which states, "Planning applications that accord with the policies in this draft Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise," should be extended to include, not just Local Plan policies, but other Government/European policies, for example those set out in the National Planning Policy Framework (NPPF), the Habitats Directive eg Policy 8 does not follow the National Planning Policy Guidance (N PPG) 	
<p>Green Belt</p> <ul style="list-style-type: none"> • No mention of Green Belt in the policy yet almost 90% of the land in the borough is such. • It is protected specifically to preserve the individual nature of towns and villages and prevent the urbanisation of those with a rural nature. Yet it is exactly this which is being proposed in this Plan for several of the borough villages • Paragraph 4 of this policy should be extended to include other Government/European policies, eg those set out in NPPF, the Habitats Directive etc. It should be noted that not all of the policies in this draft Local Plan accord with national policy • No mention of the Green Belt, despite the fact that this covers nine-tenths of the borough and is Britain's biggest contribution to Sustainable Development ever instituted 	<p>The Local Plan must be read as a whole. There is a separate policy (P2) which seeks to protect Green Belt.</p>
<p>Monitoring</p> <ul style="list-style-type: none"> • Does not show how many homes have been delivered as not what the people living in the borough want • Should include flooding, new and existing properties • No monitoring is proposed for reductions in growth estimates and the effect this would have on housing or employment land and this is an omission. • No monitoring is proposed for the cumulative effect of development and this is an omission • Similarly monitoring the numbers of properties or amount of development or employment land that is delivered demonstrates a predilection for development at the expense of the environment. Monitoring of delivered infrastructure and impact on environment must be included. • Monitoring of this policy seems to relate primarily to land use for housing and commercial development. Sustainability in the NPPF covers economic, social and environmental indicators. • Allow for adjustment of the housing target should parameters change • The review should also include an assessment of local infrastructure and its ability to cope with development; and the environmental and ecological 	<p>Policy S1 of the 'Proposed Submission Local Plan: strategy and sites': strategy and sites does not include any monitoring indicators because it is not considered that the success of the policy can be quantitatively measured.</p>

<p>impacts of development [impact assessment]</p> <ul style="list-style-type: none"> • An environmental impact assessment of new development to check that this was as planned • Reductions in targeted housing and employment land if new demographic and other studies indicate lower growth than forecast. • A form of monitoring indicator is developed that records the sustainability credentials of all approved developments against which the quality and not just the quantity of sustainable developments can be assessed. This will allow the Council and the public to evaluate whether presumption is actually being given to development that can legitimately be described as sustainable and therefore whether this policy is being applied in the spirit for which it is intended. • Inclusion of indicators outlining how the presumption is to be monitored is welcomed. What is important is that sustainable sites are approved without delay, as required by NPPF Paragraph 14 • The Monitoring Indicators section of Policy 1 fail to recognise the combined influences on each other of housing, employment and infrastructure. • First paragraph "For each policy, there is a summary delivery strategy, monitoring and review indicators." Do you mean strategy or procedure? The grammar in this sentence is not good. Why not say "For each policy, there is a summary delivery strategy. There are also monitoring and review indicators." Regarding line 6 in paragraph 3, "safeguarded sites" should be changed for clarity to "safeguarded future development sites." • Policy 8 (see below).We suggest that a form of monitoring indicator is developed that records the sustainability credentials of all approved developments against which the quality and not just the quantity of sustainable developments can be assessed. This will allow the Council and the public to evaluate whether presumption is actually being given to development that can legitimately be described as sustainable and therefore whether this policy is being applied in the spirit for which it is intended • the monitoring criteria reveal that they are more interested in development taking place rather than whether it is "sustainable" in my understanding of the word • Local Plan review - We believe that this review should also include an assessment of local infrastructure and its ability to cope with development, and environmental impact assessment. 	<p style="text-align: center; opacity: 0.5; font-size: 48px; font-weight: bold;">Draft</p>
<p>Evidence Base</p> <ul style="list-style-type: none"> • "Evidence base" documents (that ostensibly support draft Local Plan – but which are in fact often deeply flawed) attempt (often incorrectly) to record precise low-level details of proposed development sites, with the aim of 	<p>The Evidence Base has been refreshed following the previous consultation on the Draft Local Plan and is considered to be up-to-date and robust. The Evidence Base will be scrutinised by the Planning Inspector at the Examination in Public (EIP) and used to determine whether the plan is sound. Further comments relating to the</p>

<p>generating mechanistic numerical measures that are apparently intended to magically produce the “right” answer. This is no substitute for competent fundamental thinking, and it is very unlikely to result in the goal that <i>“sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system”</i> (NPPF 8).</p> <ul style="list-style-type: none"> • Plan is constructed on a naïve and out-of-date population projection. G L Hearn’s projection (that was used to generate the housing figure in the Local Plan) was based on ONS mid-year figures for 2011, instead of the considerably lower ONS SNPP 2012 projection that was published on 29th May 2014. It also used a simple flat profile for migration for the entire period until 2031 (see Figure 1). • Population projections underlying the plan are out of date and the methodology underlying them is flawed • The current draft Local Plan is not fit for purpose. It cannot be considered to be sustainable until the process used to develop the Plan itself takes full account of the points below • The gross difference between the mechanistic procedures used to produce the evidence base documents, and the essentially human judgements needed to balance the economic, social and environmental gains required by NPPF: 1. Up-to-date data (as per NPPF 158).2. Sensitivity studies on projections or forecasts to quantify the impacts of future uncertainty on the Plan.3. Periodic formal checkpoints to allow future uncertainty to be recognised and managed effectively within the Plan itself • The Evidence Base is inadequate to support such a presumption as it is not possible to determine what development would be sustainable. Equally, the lack of integration between housing, employment and infrastructure needs is at best unhelpful in this regard. • The Evidence Base is not good enough to provide a framework for testing sustainability, and the Sustainability Appraisal ('SA') has flaws identified in response to the SA consultation. • The Evidence Base should be kept under regular review in addition to the developments and infrastructure completed in each year of the Plan. Policy is based on the need to provide 13,040 homes - this is flawed – doesn’t account for constraints, inadequate infrastructure, not based on the latest ONS figures, re-use of office buildings for residential, Government policy to reduce international migration, fails to require Surrey University to house its own students it proposes ‘insetting’ 16 out of 24 villages in the borough and identifying a few very large areas of land to be ‘safeguarded’ without presenting the ‘very special circumstances’ 	<p>Evidence Base are addressed in the table for appendix C.</p>
<p>Horsleys</p>	<p>These comments have been responded to in the table for Planning for Sites</p>

<ul style="list-style-type: none"> • These plans and decisions have not taken local circumstances into account and have placed an unreasonable development burden in the areas of East and West Horsley that would totally change the character of these rural villages. • Object to inseting • Insetting of West Horsley North and South does not appear to comply with the overarching ethos of the NPPF. 	
<p>Wisley</p> <ul style="list-style-type: none"> • Shops and school provided 'if' enough children – not sustainable • Surrounding villages will suffer from increase to traffic from 'sustainable' new town, pollution, delays, B367 Newark Lane too narrow • Would overshadow Ockham • Gridlock Ripley without full junctions to A3 • GBC is not meeting its legal duty to deliver sustainable development by promoting the new settlement option at Wisley. The SA is an important component in forming a judgment on this issue and WAG considers it is inadequate and that more sustainable alternatives exist for development 	<p>These comments have been responded to in the table for Planning for Sites</p>
<p>Normandy</p> <ul style="list-style-type: none"> • Proposed major expansion of the village not sustainable • No shops • A surgery working at near maximum capacity • A primary school which is over subscribed • Flexford end of the village has a minimal bus service 	<p>We are planning the infrastructure to support this planned strategic development. This includes the expansion of Wyke primary school, a new secondary school, and improvements to the railway line serving Westborough station.</p>
<p>Effingham</p> <p>During the wars, food was grown on Effingham Common, a lifesaver in different circumstances. Incidentally and sadly, GBC wish to build a car park on it.</p>	<p>The Thames Basin Heaths Special Protection Area Avoidance Strategy supports the delivery of a small parking (six spaces) area to improve access to Effingham Common. The Council is considering a number of options and it is not considered preferable to deliver one on the common.</p>
<p>Ockham</p> <ul style="list-style-type: none"> • Local plan for this village is not sustainable. Presumption in favour of sustainable development needs to be tempered by the social, economic and environmental constraints as required by the NPPF • Requires development to work inside the limitations of land which is not Green Belt designated. The NPPF accepts the permanence of Green Belt and doesn't permit unlawful development except in exceptional circumstances. • Local Plan disregards the restrictions on Green Belt development by threatening to remove 15 out of 24 villages from the Green Belt. Inset agricultural land, commonage, SPA protected land and SSSI sites are all included for development. Exceptional Circumstances have not been shown. 	<p>These comments have been responded to in the table for Policy 10</p>

<ul style="list-style-type: none"> • What happens in 2031? – Development demand will once have gone up! When the bank of assets is depleted, who will sustain all these people who still need houses that don't flood, food, clean water? Why is 'climate change' strategy not GBC's primary policy. Numbers of bees are falling at alarming rates 	
<p>Planning principles - should be applied to underpin both plan-making and decision-taking and so these should be taken into account in the framing and the administering of the Local Plan. This has not been done leading to an unreasonable proposal and breach of the principles.</p>	<p>The 'Proposed Submission Local Plan: strategy and sites' is considered to reflect the principle of sustainable development and conform with the NPPF and NPPG.</p>
<p>Neighbourhood Plans - Planning applications must consider policies in neighbourhood plans as well as material considerations looking at the impact as a whole.</p>	<p>Comment not specifically related to the Local Plan-making process. In determining planning applications, the Council will have regard to the Development Plan (including adopted and emerging Neighbourhood Plans).</p>
<p>Self Build</p> <ul style="list-style-type: none"> • <i>"We urgently need to build more homes and now is the time for councils to act and earmark areas that encourage people to buy a plot of land and get a builder to build them a home."</i>The above comments from the Planning Minister, at the time of comment, clearly outlines how the government intended LPA to respond to the requirements set out in the NPPF when drawing up new Local Plans. Councils should take a proactive position to providing land and should undertake rigorous and effective evidence gathering to measure custom and self build need in their districts. National Custom & Self Build Association <p>Requirement of NPPF to plan for <i>people wishing to build their own homes</i></p>	<p>The Self-build and Custom Housebuilding Act 2015 requires Local Planning Authorities to set up and publicise a self-build register by April 1st 2016. The Council have met this duty and will have regard to it in its future planning, housing, regeneration and disposal functions. The interest in self-build is acknowledged in the reasoned justification of Policy H1 paragraph 4.2.12 of the 'Proposed Submission Local Plan: strategy and sites' and some of the strategic site allocations.</p>
<p>Process</p> <p>We ask GBC to lead the process and be inclusive. It should be a joined up, borough-wide exercise not just focused on the town centre, research park and Slyfield. We suggest strong, long term community partnership will be needed. The Strategic Vision should encompass matters not under GBC's direct control. Wider partners with a pivotal role should be involved from the outset.</p> <p>ACTIONS:</p> <ol style="list-style-type: none"> 6. Set up effective mechanisms for working more closely with the community to shape Guildford's future. 7. Prepare a longer term Strategic Vision, with full public engagement, for the town and surrounding villages. 8. Press ahead with producing a robust Local Plan to overcome vulnerabilities to inappropriate development and shape any initiatives pursued under the Localism Act, engaging with the community throughout working to a clear and meaningful consultation programme. 	<p>The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure to needed support this planned housing. The IDP will be updated as further detail is available. Developer contributions (including the "pooled" Community Infrastructure Levy), planning contributions and other funding sources will be used to ensure that key supporting infrastructure is delivered to be available when it is needed.</p> <p>The floorspace figures in the 'Proposed Submission Local Plan: strategy and sites' are based on the ELNA. It identifies the need for 3,200 additional B class jobs which has been calculated from an average of three employee forecasts. AECOM then translated this into the need for floorspace using historic trends which will take into account the growth of homeworking. The ELNA takes into account B class jobs and does not include any other sectors including retail.</p> <p>The Retail and Leisure Update Study 2014 assesses the need for retail, food and drink floorspace and leisure needs over the plan period to serve the growing population, whilst retaining</p>

<p>9. Identify any sites that need safeguarding to prevent development that would impede subsequent construction of critical infrastructure (eg road bridge over railway, space for rail link to Heathrow, cross Guildford road link).</p> <p>10. Ensure all developers contribute to new infrastructure. Break down long term aspirations into bite sized chunks of work that can be costed and funded using mechanisms such as Community Infrastructure Levy.</p> <p>8. Encourage businesses to strengthen their links with the community and make greater provision for their traffic and parking impact.</p> <p>Plan for the economic opportunities of the future. Heed changes in retailing and do not assume retail-led development will resume with economic recovery. NPPF says Special Protection Area, Green Belt, SSSI's, heritage sites and conservation areas are excluded from presumption in favour of development</p> <p>All of Ockham and the former Wisley airfield are within 800 m of the SPA protection, much of it lying inside the 400m protected zone, and the green belt. The SSSI of Ockham Common is also in the former Wisley airfield site. There are 29 grade 1 and grade 2 listed buildings in Ockham, several are within 10m of the proposed new town in the heart of Ockham. Parts of the Ockham conservation area are within 100 meters of the site</p> <p><i>Object to GBCs failure to examine the bigger picture, regarding the long-term sustainability of Thames Basin SPA. GBC have other choices than to build near SPA</i></p> <p>The 1987 United Nations Brundtland report definition of Sustainable development is: 'Development that meets the needs of the present without compromising the ability of future generations to meet their own needs.'</p>	<p>consistent market share.</p> <p>These comments have also been responded to in more detail in the table for Planning for Sites</p>
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Comments on Policy 3: Homes for all

Issue	Guildford Borough Council Response
<p>Support as -</p> <ul style="list-style-type: none"> • Council has worked hard to develop an inclusive approach to the policies and proposals • Policy covers spectrum of future home owners • Catering for all types of housing on all sites including those inset from Green Belt and previously developed • Communities with a good mix of housing to accommodate everyone tends to lead to a healthier community both physically and mentally. We would want to see a sympathetic mix of housing. • We agree with the proposed Policy. The absence of an up to date Local Plan has led to a shortage of housing through inadequate land supply and the consequent inability to provide small units, family sized units and affordable housing. There is not enough housing, especially affordable housing, to meet the natural increase of the population, the inward migration population increase, the increase in household units, and accommodation for first time buyers, and those unable to compete in the housing market. The analysis of the Housing Market in the SHMA shows that there are extreme affordability issues in Guildford when compared to the wider South East. • Mix of housing should meet the needs of a broad range of socio-economic citizens but not be so prescriptive that it suffocates development • Many workers can't afford homes close to work so more new homes are needed to increase supply and ensure house prices don't exceed salaries • The Homes for all (Policy 3) and appropriate levels of housing that is affordable (Policy 4) which will help with recruitment and retention of young staff • While the spirit of this policy is welcome, the detail is problematic • Homes for all (Policy 3) and appropriate levels of housing that is affordable • Housing mix and traveller pitches are all vital • Some well planned, sympathetic additional housing in the Horsleys would be welcomed and most especially housing that will enable the older generation to downsize and remain in the area, and the young to buy their first homes. • I support the proposal not to allow clusters of housing of one type • Not against development if it meets the needs of the community, especially key workers • We welcome this statement and hope that this aspect of the policy will reduce the number of new developments for large "executive " homes which do not meet local need. • Focus on one and two bedroom affordable houses and two and three bedroom 	<p>Support noted and welcomed.</p> <p>Ensuring a mix of housing types, tenures and sizes is addressed in the Local Plan policies on housing and affordable housing.</p> <p>We recognise the need for additional housing to support local employment.</p> <p>The wording of policy H1 is considered to reflect these comments.</p> <p>Topography is considered to be covered by character of an area.</p> <p>Building a variety of homes to meet a range of needs as set out in the Strategic Housing Market Assessment (SHMA) will ensure more 1,2 and 3 bedroom homes are provided. The redrafted policy reasoned justification sets out the findings of the SHMA 2015 in respect of the number of bedrooms required for affordable and market housing.</p> <p>Policy H1 has been drafted to give flexibility to determine density on a case by case basis.</p>

Issue	Guildford Borough Council Response
<p>market houses in section 4.17 is welcome as there is a real shortage</p> <ul style="list-style-type: none"> • The policy is also considered to reflect Objective 1 of the Sustainability Appraisal, prepared by URS and published in August 2014, which seeks to provide a sufficient housing of a suitable mix taking into account local housing need, affordability, deliverability, the needs of the economy and travel patterns. • We support the flexible approach that this policy seeks to adopt, particularly with regard to housing mix and density which allow for greater consideration to be given to the characteristics and location of an application site. These aspects of this policy will help to ensure that new development complements existing built and natural environments • Many of the members of the Chamber have experienced difficulties with recruitment due to the high house prices within Guildford • The policy does however provide flexibility in recognising that regard will need to be paid to the characteristics of the site and its location, as well as the viability of the scheme. It is considered that this approach is appropriate and accords with the Council's strategic objective to: "require new developments to be of the highest quality design, have a positive relationship with their surroundings and contribute towards making environmentally sustainable places." • We support social inclusion and are pleased that the plan's economic and sustainable community strategies have this aim at their heart. • Support the growth and development of the local economy that the plan aspires to deliver • The plan is so wide ranging that we hope people aren't going to take a narrow interest in what it means for their house, their street or their locale. We trust that enough people can get to see it and understand it in its fullest sense to enable support for the actions that are needed to make Guildford work for everyone. 	<p style="text-align: center; opacity: 0.5; font-size: 48px; transform: rotate(-45deg);">Draft</p>

Issue	Guildford Borough Council Response
<p>Homes for all title</p> <ul style="list-style-type: none"> • "Homes for All", but notes this is a somewhat generic heading that is not defined clearly enough in the ensuing verbiage. • Why should Guildford be providing homes for all? • The concept of Homes for All could loosely be taken to mean 'meeting all demand' where, to all intents and purposes, demand in Guildford is limited only to the extent excessive development does not do irreparable harm to the town and borough. Need, however, is a different matter. • The title is misleading. The GBC SA (July 2013) defined "SA Objective 1 – To provide sufficient housing of a suitable mix taking into account local housing need, affordability, deliverability, the needs of the economy, and travel patterns." This better reflects the constraints affecting housing delivery in Guildford and the role of commuting. The objective is not to provide "homes for all" • Guildford Borough seek to provide homes for all? It should only provide sufficient homes to meet a properly quantified need which is within the capability of the borough to provide. • Homes for all is a meaningless objective • The title "Homes for all" is nonsense and not aligned with the SA Objective 1. 	<p>The title of the policy promotes inclusivity by suggesting that homes for all types of people are provided. This is qualified by the text which clarifies the housing should meet the needs and demands of different people in our community.</p> <p>The policy reflects the ambitions of the National Planning Policy Framework to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities (para 49).</p> <p>The National Planning Policy Framework (NPPF) (para 47) requires local planning authorities to meet the full objectively assessed needs for market and affordable housing as far as is consistent with the policies set out in the National Framework.</p>
<p>Homes for all</p> <ul style="list-style-type: none"> • Building lots of houses won't create affordable homes. • <i>"New residential development is required to deliver a wide choice of homes and meet a range of housing needs as set out in the latest Strategic Housing Market Assessment."</i> However Local Plan policy for provision of Homes must fit with NPPF Section 6 paras 47 to 55 where the parameters for delivering new homes are comprehensively set out. • Until the SHMA housing number is arrived at using sound and accepted methodology, it is both disingenuous and perverse to discuss how that number might be split into dwelling types • This is an admirable policy in principle but it misses out so much of what needs to be delivered within neighbourhoods and communities. A large part of the issue here is the poor quality of the assessments of the Guildford Urban Area. • The absence of critical data overall and character assessments of settlements across the borough and neighbourhoods within the Guildford Urban Area means that opportunities have been missed to use spatial planning to contribute to solutions which address the most serious areas and elements of relative deprivation, increase density in some locations, ensure development enhances local areas, prevent overdevelopment of particularly sensitive areas and help ensure the viability of local services whilst respecting the quality of local environments • Why should Guildford be providing homes for all? The number of homes 	<p>Larger housing developments will have a proportion of affordable housing, as set out in detail in the new policy H2.</p> <p>Paragraphs 47 to 55 of the NPPF 'Delivering a wide choice of high quality homes' has been the starting point when drafting this policy; In particular paragraph 49 and planning for a mix of housing based on trends and needs of different groups in the community.</p> <p>The West Surrey SHMA September 2015 has assessed the housing need for Guildford borough and a breakdown of housing types, sizes and tenures. The number of homes needed over the plan period are set out in policy S2.</p> <p>It is important to make the most efficient use of land with an appropriate density.</p> <p>The Residential Design Guide has looked at the character of residential areas of Guildford borough.</p>

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<p>provided should not exceed the capacity of the borough.</p> <ul style="list-style-type: none"> • I object to GBC not recognizing that ‘homes for all’ should be built where needed, i.e. locally. GBC must ensure new homes are spread fairly and proportionally throughout the borough. Nobody is fooled into believing that dumping new towns on Green Belt will be for local people, or that they will be affordable • It puts building homes as a higher priority than (a) preserving the Green Belt and (b) making attempts to reduce the growth that feeds the need for new housing. • development of smaller personal businesses and smart growth from home • Policy 3 is not supported by correct statistics or have the appropriate data to make a proper decision. There should be current and projected information broken down by Housing mix, density, specialist housing, students, travellers, and houses in multiple occupation. There should also be a specific blueprint for each of these categories to be measured and regulated. • Most ordinary first-time buyers cannot afford to get on the housing market in Guildford so new homes will be bought by high earners moving out of London. • Object as infrastructure and local services are inadequate to cope with more houses (mains sewer can’t cope, flooding issues) • Planners must continue to take into account the different local styles and densities of housing in the different areas of Guildford and its surroundings. Particular care should be taken to avoid putting strain on already over-crowded streets by building too densely without sufficient parking provision. • More explanation of why so many new homes need to be built • Small scale in-fill, redevelopment or subdivision to meet need • Meet the housing need of local residents who need to move • High Rise development was the answer to our housing needs but they became unsafe and blown up. • will affect current house prices • We live in a wonderful county with a unique history and beauty. More housing will lead to a fundamental change of character of our area. I do respect the need for housing for all – but our area is already full of people, the traffic is too much, the infrastructure cannot be expanded in the way needed. There are many areas further out which may provide more space • Based as it is on the SHMA this policy is to some extent flawed • The number of homes provided should not exceed the capacity of the borough, only provide those homes it can sustainably • it is absurd to attempt to backdate assessment of housing need. I understand there are serious errors in the need calculations upon which this provision is based 	<p>Green spaces are addressed in Policies D1 and I4.</p> <p>The relevant findings of the SHMA in relation to this policy have been summarised in paragraph 4.2.3. The reasoned justification goes into further detail.</p> <p>The dwelling per annum target figure/ number of homes is set out in Policy S2 Borough Wide Strategy. It is not necessary to repeat the target in this policy.</p> <p>Density will be determined on a case by case basis taking into account local context and character. The detail on numbers and mix is set out in the SHMA. In para 4.17 we state that there is a predominant need for 1 and 2 bedroom affordable houses and 2 and 3 bedroom market houses.</p> <p>The introduction (para 1.10) states that that the plan should be read as a whole.</p> <p>The SHMA looks at the housing mix, tenure, student accommodation, specialist housing etc. Travellers accommodation needs are looked at in the Traveller Accommodation Assessment. Where possible we monitor the different types of housing granted planning permission.</p> <p>The NPPF (para 47) requires local planning authorities to meet the full objectively assessed needs for market and affordable housing as far as is consistent with the policies set out in the National Framework. The SHMA shows a predominant need for 1,2 and 3 bedroom homes.</p> <p>Infrastructure is addressed in policy I1 and Appendix B.</p> <p>Density is determined on a case by case basis taking into account local context and character.</p> <p>Policy S2 addresses the scale and distribution of development and sets the housing target.</p>

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<ul style="list-style-type: none"> • The housing needs are based on the SHMA and National Frameworks. These both suggest housing development well beyond local immediate need and include growing student populations, Government immigration expectations etc. Thus the 670 or so homes a year, well up from the previous target of approx. 450, will include many for people who would like to live in Guildford, but are not on essential housing requirement. • the SHMA appears to be a work of fiction and no justification for the number reached has been provided to the people of Guildford. There has been no adjustment for constraints; there is no requirement to provide a “wide choice of homes”- unless it is to satisfy the various house builders who have enjoyed hospitality provided by GBC. Therefore, this and all policies stemming from the SHMA are flawed and need to be reconsidered. • Is GBC seriously suggesting that new house building should continue until everyone who wants to live in the borough can do so? Totally unreasonable! • Therefore any presumptions for development in the plan should prioritise those needs and policies should be drafted accordingly. The draft should be amended accordingly • suggesting that each community should facilitate a small number of low cost, non profit making units to create homes for low income families or key workers • Policy 3 and 4 are based on unproven assumptions that create totally unsuitable unjustifiable high density development out of character with its surround on Green Belt land and is based on implausible interpretations of a flawed plan • sufficient homes for local people and particularly that there are sufficient affordable homes for key workers and young people. • lack of availability of suitable brownfield sites within the borough and the need to protect the green belt so far as possible, it is essential that housing development should meet local needs – more affordable housing for those on middle and lower incomes who want to buy their own homes – prioritise these • This policy, as it stands, is unenforceable and very ill defined. This policy does not discuss density, and is very loosely worded so that it has no legal force and cannot be used to make policy decisions or determine planning applications. Until the housing number is right, it is impossible to discuss how that should be broken down into categories; when the housing number is determined, the proportion of mix etc., density will need to be determined. • Guildford Borough principally needs: affordable houses, and homes for older people it does not need more large mansions for wealthy migrants to the area. • Object - Paragrah 159 requires local planning authorities to have a clear understanding of housing needs in their area. They should prepare a Strategic Housing Market Assessment • Whatever decision is reached about the number of houses Guildford there needs 	<p>Small scale in-fill, redevelopment or subdivision is appropriate in certain locations but this alone will not meet our housing need.</p> <p>Planned strategic development sites can help address the infrastructure needs.</p> <p>The SHMA has been updated since the original drafting of this policy and comments on the SHMA are addressed in detail in Appendix C the evidence base section.</p> <p>The Land Availability Assessment has assessed the potential of suitable and available brownfield sites.</p> <p>The wording of the policy has been reviewed. Density is addressed by the policy. This policy aims to get the mix and balance of homes right for the borough.</p> <p>A SHMA has been prepared which looks at a variety of accommodation needs and quantum. This local plan, through the site allocation policies, identifies where the new development should go.</p> <p>Affordable housing is addressed in greater detail under Policy H2. This policy seeks a variety and mix of affordable housing to meet the various identified needs of our community.</p> <p>Providing more housing of a suitable mix should enable essential workers more opportunity to access housing.</p>

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<p>to be an analysis of how the number of houses should be allocated to different groups and where they should go.</p> <ul style="list-style-type: none"> • There are three groups who will need “affordable” housing. There is the welfare group, estimated to be around 1,500 who are regarded as “homeless” and fall within a social welfare category. Another category “skilled worker housing” are those young scientists and professionals who can find work in Guildford but cannot market rates. They are key to the growth of the economy and who indirectly provide resources for welfare expenditure. They need to be given top priority for without growth social affordable housing cannot be funded. Thirdly there are the elderly who will need help – although these could fall within the welfare umbrella. There is a frustrated demand for elderly housing by asset rich home owners desperate to move to smaller and more conveniently located homes. These could be in the town centre and could help fund housing for less well off elderly. There is then the need to plan locational priorities. Which houses need to be near to work places so as to minimize traffic flows, which need to be near shops, and which need to have more space. As an example one could following the above considerations allocate key worker housing adjacent to the University and Research Park, housing for the elderly in the town centre, and family housing around the Borough. The manner in which houses should be allocated will entail a judgement but should be guided by the different social and economic objectives established by the above policies. 	
<p>Homes for all – executive housing</p> <ul style="list-style-type: none"> • No more executive homes or large mansions, enough already which attract commuter/ wealthy migrants. This has pushed the house prices up and made the town unaffordable for the locals • Allowing more executive houses will be excessive and catering for this demand will destroy the beauty of the area and Green Belt. Large scale development out of character • Experience in East Horsley shows that there is a continuing process of builders buying up the smaller buildings and replacing them with “footballer” size properties which are unaffordable by the locals and therefore does nothing for local people who need accommodation. 	<p>This policy requires new residential development to deliver a wide choice of homes to meet a range of accommodation needs as set out in the latest Strategic Housing Market Assessment.</p> <p>The findings of the SHMA will help promote more one, two and three bedroom houses within development schemes and a mix of tenures.</p>
<p>Housing Mix</p> <ul style="list-style-type: none"> • We need a wide range of house sizes and prices to address the needs of the market/affordability • Changing eligibility criteria for social housing masks real need • Catering for demand for 5 bed homes will destroy that beauty and the continuity of the Green Belt. There is no ‘right’ for people to be able to fulfill a desire to live in one of the most beautiful parts of the country (certainly in the over-crowded 	<p>We recognise the need for a wide range of accommodation, and this policy requires new residential development to deliver a wide choice of homes to meet a range of accommodation needs as set out in the latest Strategic Housing Market Assessment.</p>

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<p>South-East of England). It would be perverse to the point of madness to try to assuage such desire by additional development. Providing infrastructure in attempts to meet the new needs of migrants into the Borough would simply encourage even more. As with policy 3 this policy would also inevitably lead to exponentially growing numbers without end.</p> <ul style="list-style-type: none"> • A mix of homes is clearly desirable, which should at present reflect current needs, rather than the marketability of new dwellings to people who may be attracted to the area by them. The future needs can only be assessed in the future, and will need ongoing reassessment. Assumptions about future need should not be based on a growth scenario. • Why is there an emphasis on providing such a mix of property types and sizes when there is a definite shortage of smaller lower priced properties? It would seem appropriate that flats close to the town centre (along areas in Walnut Tree Close) would seem appropriate - particularly with more traditional terraced houses and larger buildings in the neighbouring areas of town. • The statement that 'New residential development is required to deliver a wide choice of homes and meet a range of housing needs as set out in the latest Strategic Housing Market Assessment' is erroneous. All detailed surveys of housing need in the Borough conducted by local organisations (i.e. by local people who, by dint of NPPF paragraph 17, should be empowered; not by remote, development-biased consultants) conclude that the most pressing need is for affordable housing. Consequently, the proportion of affordable housing catered for in the Local Plan should be as high as possible, ideally about 80% of total projections. These are the only houses that the borough actually <i>needs</i> for its indigenous population. • Need for more affordable houses (the only type of housing needed for our indigenous population) • It is naive in the extreme to expect developers to do anything but construct houses that will maximise their profits. high priced "executive" homes will result in a huge increase in traffic and demand on local services. The "affordable" homes will, even at £146,000 (the figure quoted in the Plan) be out of reach of the people • developers, who wish to build larger houses which are more profitable, usually manage to minimise the number of smaller homes either by the splitting of the whole into smaller parcels or deals to have the smaller homes built in other locations which results in developments not having the 'affordable' homes they should • There is no detail with regard to the mixture of the types of property to be built. We know it is the view of our residents that the needs of the parish are strongly aligned to smaller and affordable properties. 	<p>The housing numbers are established and addressed in greater detail in the response section for Policy S2.</p> <p>The SHMA will be updated in the future as required. The findings of the SHMA will help promote more one, two and three bedroom houses within development schemes and a mix of tenures. The SHMA found that the demand for four bed properties is significantly lower.</p> <p>We want a flexible housing stock that can be adapted to meet the changing needs of people over their lifetime, and this can include 'step-free' properties.</p> <p>Many of the principles of Policy D1 Making Better Places are compatible with dementia friendly environments.</p> <p>The SHMA is an important piece of evidence base for the Guildford local plan and it considers and quantifies the variety of affordable housing needs.</p> <p>Housing for our ageing population is addressed within the reasoned justification of the policy.</p> <p>Housing numbers are given in policy S2. The breakdown of housing numbers has</p>

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<ul style="list-style-type: none"> • the fundamental question of housing need makes us question the ability of the Local Plan to deliver the appropriate mix of housing stock. • The need is to cater for all types of houses, but no numbers relate to each, except for the category of Travelers, which is also confusing in its meaning with homes shown against plots. • It is also worth considering a “Housing Needs Analysis” be carried out so that types can be identified • ensure that housing mix genuinely does take account of the “size, characteristics of the site and location” to ensure that homes are commercially attractive. SHMA gives a realistic summary position and the Council should support schemes which broadly follow these principles. The Council should not, however, seek to unduly influence the proposed mix. • Local housing need is critical, along with the housing mix. Affordable, social and market housing must be mixed together to ensure an integrated community • more mixed development would be preferred on the periphery of Guildford and in other certain areas. • object to this policy as currently worded. If the policy related to local need then it could be supported. • We will expect new residential development to be on sustainable sites and to offer a real choice of homes to meet the accommodation needs of our communities. Concentrations of any one type of accommodation in any one place will be avoided, with HMOs limited to no more than 40% and the creation of gated communities not permitted. • All development should embrace good design principles with design proposals for sites of larger than 0.01 ha, situated within conservation areas or other sensitive heritage or natural environment sites being subject to review by the design panel to be implemented by GBC. • housing tenure of new housing estates should be better-integrated than has been the case in recent years. • Retain degree of flexibility to comply with NPPF para 173 so that affordable housing requirement does not impact on viability of scheme • Housing mix should be appropriate to site and location • consider housing mix carefully rather than seeking to create Sheltered accommodation schemes where older people are housed together - instead look to create housing schemes which offer a mix and encourage mixed communities and engagement between different members of the community . Look at intentional communities or co-housing schemes (Dutch model) as ways of reclaiming communities that support each other • all private developments will be based on profitability • evidence of persistent under delivery - affordability and affordable housing needs 	<p>not been specified to retain flexibility if the SHMA is updated.</p> <p>The local need for travellers pitches has been assessed in the TAA. We are aware of recent Government guidance on travellers. Pitches are located across the borough. Strategic development sites will deliver a mixture of uses and housing including pitches.</p> <p>The SHMA gives a breakdown on tenure and number of bedrooms for development schemes which will be a guide when negotiating housing mix on development sites.</p> <p>The Land Availability Assessment looks in detail at potential development sites and their location.</p> <p>HMO's are addressed in the reasoned justification. Gated communities is considered to be a more detailed issue for Development Management policies or a SPD.</p> <p>Guildford does have an independent design review panel for significant schemes. Significant schemes are defined as those that incorporate 100 new homes or more, or exceed 10,000sqm of development floor space, or by nature of their location or complexity or otherwise are deemed to constitute a significant development.</p> <p>Policy H2 aims to help create balanced, sustainable and inclusive communities.</p> <p>The SHMA recognises the need for more 2 and 3 bedroomed market housing suitable for families.</p> <p>Policy S2 addresses the quantum of development in greater detail.</p>

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<p>are critical issues locally, which are creating socially inequitable communities. In this context, the planning system is failing to deliver balanced and thriving communities, which offer sufficient housing choice to all parts of society.</p> <ul style="list-style-type: none"> • If no further development the price of the existing housing stock will continue to rise and this will further erode affordability for key workers in the community. The key focus of any further development must be to bridge this affordability gap for those most at risk of exclusion. Attempting to satisfy the natural demand for this area is not a sustainable proposition as further development will only lead to further demand, leading to ongoing erosion of the green belt and its replacement with the urban sprawl Green Belt was originally created to prevent • It is not clear if mixing traveller accommodation with market housing development on strategic sites is practical. • Appeal of Guildford to: a) Young professionals - natural flat dwellers - whose employment may equally as well be London based as local. Well-off families looking for safe family housing, near to good schools and with either open countryside around them, or situated within the environs of a County Town type area - but whose work / economic focus is London/City based or Internationally orientated. Wealthy often non economically active households, wanting to move out from within the M25/South west London conurbation for improved quality of living after retiring or downsizing – either physically or economically. Plus of course we should not forget the continuing appeal and convenience - but less so affordability - it holds for its already established community, including in the rural areas a significant proportion with long standing family connections • As the housing number is incorrect the categories cannot be correctly identified and so it is not possible to say that Guildford will provide housing for all • Concern over Social Housing alongside Affordable Homes being built: Changing criteria for gatekeeping of Social Housing means needs are underestimated. Appropriate-sized Private rented sector housing is unaffordable by the working poor - with numbers of these families increasing, as seen by welfare agencies in the Borough. Increase cost to GBC from Housing Benefit is no answer. • Self- build homes increases the diversity of buildings within developments. 	<p>Providing pitches and plots on strategic development sites will help meet the targets as set out in the Traveller Accommodation Assessment; we are not aware of any considerations which make this unpractical.</p> <p>The demand for different types of accommodation has been assessed in the up to date SHMA.</p> <p>New wording on self build and custom housebuilding has been added to the reasoned justification.</p>
<p>Housing mix – 1,2,3 bedroom homes</p> <ul style="list-style-type: none"> • I don't believe that Guildford needs more flats and small houses (1-2 bedrooms) with little or no outdoor space. The people currently in them would love to move to bigger houses (such as ourselves as we would like to have more children but don't have the space) but can't afford any of the limited number of 3/4 bedroom semi-detached or detached houses available. • It has been shown that small homes are needed for young couples as starter 	<p>The findings of the SHMA identified the need for more one, two bedroom affordable houses and more two and three bedroom market houses.</p> <p>The findings have been added to the reasoned justification in paragraph 4.2.3.</p>

Issue	Guildford Borough Council Response
<p>homes and Older People to downsize yet allowing them to remain in their local area</p> <ul style="list-style-type: none"> • Normandy survey (high return from over 80% of households) showed a need for smaller 1 or 2 bedroom dwellings. Something of this nature is good as a starter home or for single older persons wishing to down size but stay local, near friends and or family. Also preference for small developments containing 2 or 3 bedroomed housing and part ownership was preferred over rental • There are already a lot of large executive homes within the borough. The need is for more affordable housing for those people who are on middle and lower incomes. At present many of those people are priced out of the market in Guildford. They often still want to buy their own homes and any policy on affordable housing should include that possibility. Therefore any presumptions for development in the plan should prioritise those needs and policies should be drafted accordingly • The type of development should be focused on local need and include first time buyers, "down sizing" properties and a proportion of affordable housing that the will not stifle development or can be publically funded. This would indicate that smaller two bedroom properties should be encouraged in sustainable locations. The occupation study indicates that a large proportion of the existing housing stock is underutilised. There is a need for down sizing properties, first time buyer and affordable housing. This would indicate that new properties should be smaller, say 1 and 2 bedroom to allow for down sizing and new local entrants. These smaller properties should be sited in truly sustainable locations; not rural settings. • actively discouraging the development of more large houses, especially as they have high CO2 emissions, and positively encourage any new building to be of smaller and more sustainable and affordable homes. • there is no detail with regard to the actual numbers and mixture of the types of property to be built. This can only lead to developers paying lip service to the affordable aspect in these aims and continue to build the 5+ bedroom East Horsley houses that are outside the reach of most local people. 	<p>The policy aims to achieve a mix of housing, including properties suitable for downsizing.</p>
<p>Housing mix – concentrations of one type</p> <ul style="list-style-type: none"> • Concern over wording ‘concentrations of one type of housing will be avoided’ – campus specifically for student accommodation and other types inappropriate • “concentrations of any one type of accommodation in any one place will be avoided.”We welcome this statement and hope that this aspect of the policy will reduce the number of new developments for large “executive “ homes which do not meet local need • Concentrations of any one type of accommodation in any one place will be avoided. <i>There is already a high number of Traveller pitches along the</i> 	<p>The wording on concentrations of one type of housing will be avoided has been deleted.</p> <p>The wording ‘new development should provide a mix...’ will help ensure a mix of accommodation within new development schemes.</p>

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<i>Worplesdon/Normandy/Ash Green Belt corridor.</i>	
<p>Housing mix – bungalows</p> <ul style="list-style-type: none"> Bungalows should be ‘safeguarded’ in the real sense of the word, in order to allow older people who wish to ‘downsize’ to free up a family home, then there is somewhere that is suitable for them to move to. Bungalows are also needed for people of all ages who have disabilities. Many bungalows converted loft space making them less affordable Protection should be granted to bungalows to maintain the current number of this type of property and to prevent them being demolished and replaced with two storey dwellings. 	<p>It is not within the remit of planning to have a blanket approach to protect existing bungalows as each planning application must be determined on its own merits. However, what the policy aims to do is to encourage good design which encourages flush thresholds etc which can help people who wish to live in a step-free home.</p>
<p>Family Housing</p> <ul style="list-style-type: none"> Need for housing for young families who want to stay locally to support parents/grandparents Children need safe places to play outside and we don’t feel any flat-type developments would be suitable for families. Page 30 – The number of children under 15 is projected to increase significantly up to 2031 an increase of around 3,300. <i>Despite the proposal for 2 new secondary schools at inappropriate sites this will still be insufficient for the anticipated need. Where will the 1,300 remaining children attend school?</i> support - there may be a need for 3-4 bedroom affordable housing e.g. for a family with 2 children. This is more important than simply 'encouraging a reasonable quality and size of accommodation in the private rented sector' and must extend to opportunities for small families to purchase a house at a price less than 8x joint income. the houses built will not be affordable housing and therefore will still preclude young people and couples with young children from buying in the area providing affordable housing (mostly 3/4 bedroom semi and detached houses) makes a mockery of providing housing for an 'identified need' - they will be bought as most family houses by those with young families moving out of smaller properties in larger towns and the greenbelt sacrificed for profit. 	<p>A good mix of housing will cater for all types of housing needs, including families and those wishing to have garden areas for children.</p> <p>The Infrastructure Delivery Plan (IDP) and the Local Plan Infrastructure Schedule set out the key infrastructure to support the planned development. The IDP will be updated as further detail on supporting infrastructure is available. Developer contributions and other funding sources will be used to ensure that key infrastructure is delivered when needed, as outlined in draft Policy I1.</p> <p>The SHMA found a need for predominantly one and two bedroom affordable houses and two and three bedroom market housing. The reasoned justification of the policy sets this out.</p>
<p>Ageing population</p> <ul style="list-style-type: none"> More housing suitable for the elderly, particularly in the villages Demographic changes in ageing population requires more consideration for facilities/resources for infirm and disabled - not only housing - but for health and social needs. The policy recognises the need to provide a wide choice of homes and thus offer the opportunity for people to access housing which may support them in better ways, particularly housing to address the needs of the ageing population and has the potential to allow people who are ageing to downsize yet remain local. 	<p>The policy requires new development to deliver a wide choice of homes to meet a range of accommodation needs as set out in the latest Strategic Housing Market Assessment. A good mix of housing in new developments will cater for all types of housing needs, including suitable housing for older people.</p> <p>The SHMA has identified a need for 242 care or residential bedspaces and 1,334 specialist homes for older people over the plan period. The reasoned justification for this policy has been updated to reflect this (paragraph 4.2.3).</p>

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<p>An intergenerational mix in any development is important in addressing the social isolation which can befall older people and we support the aim to avoid concentrations of any one type of accommodation in any one place. In relation to an ageing population and specialist accommodation, the design of the built environment can have a huge impact on how safe and secure people with dementia feel. Lighting, appropriate materials such as floor tiles, room layout and signage can all improve orientation so that people with dementia are less likely to get confused and can therefore continue to live as independently as possible. Reference to this should be included in paragraph 4.24. You may find the following links helpful:- Dementia Friendly Environments design guidelines: http://www.surreyinformationpoint.org.uk/kb5/surrey/sip/site.page?id=3sisRwG0dAE</p> <ul style="list-style-type: none"> • Dementia Services Development Trust document, outlining how living spaces for people with dementia and sight loss can be made more supportive and accessible: http://dementia.stir.ac.uk/design/good-practice-guidelines. • Mention is made for improved options for elderly yet there is little evidence of this being implemented? The USA has areas the size of small villages totally equipped for elderly permitting people to live safely in homes they can call their own for as long as possible. Residential care homes are not the only solution to our ageing population. • A proportion of those homes could be properties capable of being adapted to meet special needs. A large proportion of the overall new provision should be focused on 1 and 2 bed roomed development. It is common ground amongst the aging population that if such accommodation is not to be found in their local area a move to an urban setting is desirable because of the need for improved access to facilities as a result of increasing frailty • Need some specific words on houses for the elderly particularly bungalow provisions. There seems to be a growing trend to remove bungalows and out in higher density housing stock. We need to preserve bungalows for the elderly and disabled population. Some research and safeguarding from development is required. • need for sheltered housing where vulnerable residents can look after themselves for the normal processes of life but have call systems and daily checks should they have problems • preference should be given to building small blocks of flats (1 and 2 bed) in all wards of Guildford. allowing residents to down size within an area where they already have roots- there is a shortage of smaller homes. • There is no clear strategy for the provision of so-called 'affordable' homes. Whilst key workers and retired people clearly need to be assisted to afford to live and/or find suitable accommodation in the Guildford Area, I can (sadly) see no 	<p>The reasoned justification for the ageing population (paragraphs 4.2.10 to 4.2.11) has been updated to cover good design considerations that help ensure accommodation is adaptable and wheelchair friendly.</p> <p>Additional wording has also been added to the reasoned justification which states 'Considering factors including a buildings layout, materials and lighting can also help people with dementia or sight loss to continue to live as independently as possible.</p> <p>The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure to support the planned development which is expected to place extra pressure on existing infrastructure, or to need new or improved infrastructure.</p> <p>It is recognised that residential care homes are not the only solution for our ageing population.</p> <p>The policies in this plan will apply to new developments and therefore be implemented in the future.</p> <p>The supporting text on our ageing population recognises that different types of homes are required to offer a real choice and enable people to remain in their own homes for longer should they wish.</p> <p>The supporting text has been updated to cover good design that help ensure accommodation is adaptable and wheelchair friendly.</p> <p>The supporting text recognises the need for a flexible and adaptable housing stock.</p> <p>The SHLAA has been replaced by the Land Availability Assessment, which identifies separate sites for student accommodation and C2 care or residential homes; they are treated as different needs.</p>

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<p>mechanism to facilitate this, in the current plan. I suggest that local community planning would be the best way to address this issue, through the facilitation of low-cost starter-homes, retirement communities and housing association development.</p> <ul style="list-style-type: none"> Given an aging population, the policy should also address the issues of homes, sheltered and other for the elderly A purpose built mix of housing for older people would be far more amenable to the residents of Ash Green compared with the Ghetto type developments proposed thus far. This policy discusses elderly housing but makes little or no recommendation as to where it should be placed as the SHLA simply lumps student housing with elderly housing; both having differing needs. National Planning Practice Guidance reaffirms this in the guidance for assessing housing need in the plan making process entitled "How should the needs for all types of housing be addressed? {Paragraph: 021 Reference ID: 2a-021-20140306) and a separate subsection is provided for "Housing for older people". This stipulates that "the need to provide housing for older people is critical given the projected increase in the number of households aged 65 and over accounts for over half of the new households (Department for Communities and Local Government Household Projections 2013). Plan makers will need to consider the size, location and quality of dwellings needed in the future for older people in order to allow them to move. This could free up houses that are under-occupied. The age profile of the population can be drawn from Census data. Projections of population and households by age group should also be used. The future need for older persons housing broken down by tenure and type (e.g. Sheltered, enhanced sheltered, extra care, registered care) should be assessed and can be obtained from a number of online tool kits provided by the sector. The assessment should set out the level of need for residential institutions (use class C2). But identifying the need for particular types of general housing, such as bungalows, is equally important." "What Housing Where Toolkit" table below has been replicated from the toolkit and shows the projected changes to the demographic profile of Guildford between 2008 and 2033: the demographic profile of the Authority is projected to age. The proportion of the population aged 60 and over is projected to increase from 20.7% to 25.6% between 2008 and 2033. The largest proportional increases in the older population are expected to be of the 'frail' elderly, those aged 75 and over, who are more likely to require specialist care and accommodation. We commend the Council for taking a positive approach in seeking to provide appropriate accommodation to meet the needs of its ageing population particularly within Policy 3, but concerns over the wording of Policy 4: Affordable 	<p>This policy acknowledges the different types of accommodation needed and aims to deliver a mix of accommodation and a flexible housing stock that can be more readily adapted to suit the occupants needs.</p> <p>Good design in properties, such as level access and flush thresholds can provide step-free living as an alternative to bungalows.</p> <p>The principal requirements are set out in the draft affordable housing policy.</p> <p>A good mix of housing across the borough will cater for all types of housing needs, and provide suitable smaller properties should residents in larger homes wish to downsize.</p> <p>The Land Availability Assessment has been updated and specific sites for C2 use class care or residential homes have been identified within the Regulation 19 Local Plan. Specialist homes for older people are expected to be provided in the housing mix on larger development sites.</p> <p>We recognise that each planning application for extra care housing will need assessing in detail to establish whether it falls within C2, C3 or sui generis use class. The Clockhouse extra care home has since been granted planning permission.</p> <p>The creation of a separate home within a backgarden development for a relative would need to be considered on a case by case basis through a planning application.</p>

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<p>Homes (this policy applies to retirement homes, sheltered housing, Extra Care Housing, and all other types of housing that fall within Use Class C3) Assumption that Extra Care accommodation sits within Use Class C3 of the Use Classes Order. Extra Care accommodation (also known as Assisted Living accommodation) while supporting independent living and importantly self-contained units, also falls within Use Class C2 by virtue of the significant level of care provided and the requisite on-site facilities that enable that care. This has been established by a number of recent appeal decisions dealing specifically with Extra Care development .Concurrently the enhanced facilities and services that define an Extra Care development are provided at an extra cost to the developer and as a result the financial viability of such developments is more finely balanced than that of conventional housing. (Extra Care) development at The Clockhouse, London Road was ultimately refused but the Council did accept that this development was Use Class C2</p> <ul style="list-style-type: none"> • Housing should cater for an ageing population including single persons. This means smaller houses on smaller plots but not in some kind of ghetto. Older people like to be part of a wider community, which might include their own family, and therefore in any larger developments a range of housing sizes and types should be provided. One justification for back garden development is for a small dwelling for use by a relative which would also have less impact due to the smaller size and lack of a car. The development would need to be conditioned such that the two units could only ever be sold as one which would create a rare and very useful commodity which would serve an entirely justifiable planning purpose; flexibility to let to non related elderly people would be allowed. 	
<p>Ageing population – downsizing</p> <ul style="list-style-type: none"> • Para 4.24 The aging demography of the Borough’s population is a major issue and an opportunity for well thought out and appropriate development. The second sentence would better read: “....to downsize and either remain within their local community or move to a more urban area where they have improved access to local facilities.” • Future developments are approved they should include the provision of ‘sheltered’ type housing for older people and those with disabilities of all ages, along with the provision of bungalows for these groups. Bungalows that currently exist should be ‘safeguarded’ in the real sense of the word to allow older people to ‘downsize’ therefore freeing up larger family homes. Protection should also be provided to bungalows to maintain the current number and not allow them to be demolished and replaced with two storey dwellings • Under occupancy of larger houses where ageing parents live alone and cannot move easily owing to the shortage of appropriate housing for their needs to live 	<p>A good mix of housing across the borough will cater for all types of housing needs, and provide suitable smaller properties should residents in larger homes wish to downsize.</p> <p>Paragraph 4.2.3 outlines the need for homes with one, two or three bedrooms.</p> <p>The paragraph of the reasoned justification (4.2.11) has been updated to reflect comments made about remaining in local area or moving to an alternative area with good access to local facilities.</p> <p>It is not within the remit of planning to have a blanket approach to protect existing</p>

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<p>an independent life close to the facilities they require</p> <ul style="list-style-type: none"> • specialised, attractive smaller homes for the elderly to free up larger homes • Need for down-size accommodation of a decent-sized apartment, or ground-floor accommodation with enough space to accommodate my visiting family and with a decent outside space, e.g. a balcony or a courtyard. There appear to be very few appropriate properties available in Guildford town centre. Today's 'older generation' are leading more active and healthier lives and wish to retain their independence for as long as possible without resorting to assisted living accommodation. <i>Please bear this demographic in mind when planning new homes.</i> • There is a shortage of homes for local older people, especially in the rural villages: if they could be accommodated in specialised, attractive smaller homes, they would free up a number of larger houses for younger people. Future housing developments should also include suitable housing for older/disabled people whether in 'sheltered' type accommodation or in the provision of more bungalows. • Need for housing to enable downsizing • Many people downsizing are asset rich but cash poor and can afford to buy homes with less but large rooms (to use the furniture they have) and if such properties are found this releases the larger family homes which are under occupied. • there is a considerable amount of accommodation in the Borough which is under-occupied by the aging population whose needs for accommodation are changing and will change in the coming years. The Borough Council should place an emphasis on the building of one and two bed roomed homes 	<p>bungalows as each planning application must be determined on its own merits. However, what the policy aims to do is to encourage good design which encourages flush thresholds etc which can help people who wish to live in a step-free home.</p>
<p>Density</p> <ul style="list-style-type: none"> • GBC should opt for higher densities and less use of land. We believe that high density can be achieved which also provides each dwelling with green spaces. BedZed is just one example of such an approach. • The policy on density is very loosely defined/ imprecise. • There should be a degree of flexibility in terms of the development potential of sites being considered in context of the local character area and the viability of the site, ensuring that the spirit of paragraph 173 of the NPPF is upheld. • High density of housing, does not reduce housing cost- merely increases Developers profits. It provides less than ideal homes in the long term. It is rational to ensure that future homes do not promote unhealthy living and over crowding • Planning policy normally works in terms of dwellings per hectare but since there is increasing variance in the size of a dwelling, density by reference to habitable rooms or even floor area might be more appropriate. High-density development 	<p>The policy supports a mix of housing at various densities appropriate to the location, for a variety of users.</p> <p>The policy states that new residential development is required to make the best use of land whilst responding to local character, context and distinctiveness. This retains a degree of flexibility towards density.</p> <p>The wording of the reasoned justification on densities (paragraph 4.2.8) has been expanded to include considerations when assessing planning applications, such as established street patterns, plot sizes, spaces around buildings, relationship with nearby buildings as well as form, massing, height of existing buildings and structures and materials.</p> <p>It is our preference to use dwellings per hectare to calculate density.</p>

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<p>could be permitted where the occupants undertake not to own a car. This is difficult to enforce but when combined at the outset by on street parking restrictions might be achievable. The policy could also be reinforced in a positive way by, for example, requiring the developer to provide long-term entitlements to free public transport and by the council ensuring that public transport was improved; similarly by ensuring that within a larger scheme there is provision for car sharing which is available on a commercial basis within the town already.</p> <ul style="list-style-type: none"> • We support the view expressed in para 2.6 that many workers are unable to afford homes close to work, and consider that there is an urgent need to address this problem that risks undermining Guildford's future prosperity. This is an important task for the Local Plan, which should provide for more new homes to be built to increase supply, so that house prices do not continue to accelerate beyond growth in salaries. • Density as an issue should be considered in more detail within the spatial strategy in Policy 2 • At present if two sites are promoted by the same developer all Low cost housing could be placed on one site and all expensive homes on another and still meet the requirement, While creating a future ghetto or slum to the detriment of the occupants of the rented accommodation. • New residential development is required to make the most efficient use of land whilst responding to local character, context and distinctiveness; the practice of developing new, free-standing residential property within existing gardens (so-called "garden grabbing") where such development would result in a materially higher plot density than for the surrounding area and where suitable access to existing highways is not available will be discouraged. Residential densities will vary dependant upon the local area context and character and the sustainability of the location. Higher density development will be supported in Guildford town • High density of housing does not reduce housing cost – merely increases Developers Profits. It provides less than ideal homes in the long term. It is rational to ensure that future homes do not promote unhealthy living and over crowding • The statement on density says almost nothing of substance • Local residents should be consulted/involved in the development of their neighbourhoods and acceptable density. • Degree of flexibility for density needed to take into account local character and viability of site (uphold para 173 of NPPF) • The Plan should set out a framework of indicative housing density ranges for different areas and a clear policy that appropriate density, building height, spaces between buildings and the ratio of hard to soft surfaces should be decided on a case by case basis according to the areas character. To support 	<p>Car free development, or the use of car clubs is a possibility in suitable locations.</p> <p>Density is addressed in this policy, whilst policy S2 focuses on the Borough Wide Strategy.</p> <p>Densities of individual development sites have been considered in more detail in the Land Availability Assessment, taking account site specific constraints. However, the most appropriate densities for various sites would be considered on a case by case basis in more detail once a planning application is submitted; Each planning application is determined on its own merits, and density of surrounding area taken into account.</p> <p>Our current approach is to encourage a good mix of different housing tenures pepper-potted throughout larger schemes.</p> <p>Local residents sharing a boundary with a proposed development sites are consulted on submitted planning applications and can comment on proposed density.</p> <p>Para 173 of the NPPF addresses site viability and deliverability. Paragraph 47 of the NPPF states that to boost significantly the supply of housing local planning authorities should...set out their own approach to housing density to reflect local circumstances.</p> <p>We aim to provide further detail on density and local context and character in the Delivering Development document and /or supplementary planning guidance.</p> <p>Policy D1 addresses design of new developments in greater detail and Policy I3 addresses transportation considerations.</p> <p>The Residential Design Guide Supplementary Planning Guidance document does encourage an appropriate transition in density and height for development sites adjoining the countryside edge; this is likely to be updated in due course.</p> <p>The SHMA has been updated and the housing target is set out in Policy S2. The wording of the supporting text on density has been reviewed. The policy supports a</p>

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<p>this framework, the Evidence Base should include a database of the current density of development in different communities across Guildford, including recent developments. Where it is not out of character, the framework should allow reasonable increases in density in urban areas where appropriate to allow for blocks of flats and to allow for increases in the density of affordable housing. Access to public transport should be taken into account, as one factor among several, when considering appropriate density and parking requirements.</p> <ul style="list-style-type: none"> • Access to public transport should be taken into account when considering appropriate density and parking requirements. However, inappropriately high density that harms character would be unacceptable and unsustainable regardless of whether a location is close to a bus stop or railway station. • High density and taller buildings should be avoided around the edge of built areas to continue the approach of soft green edges that are a valued feature of Guildford. • Should have dense housing, good for sustainable public transport, for people who don't own cars, central for bus and train. Concentrate on building apartment blocks (with good sound insulation) rather than separate housing. • Over-density of housing reduces quality of life still further in an area where it is already under pressure. It is important that the size of houses is not reduced by developers to a point where small rooms and lack of window space affect residents' health, as shown in recent research. • New homes in Urban areas should avoid over development. High Densities simply in order to meet housing targets are not acceptable. New homes in Villages should be of the size and type to meet the needs of that Village Community • This policy evades all of the important issues on housing, it does not discuss density, and it is so loosely worded that it is effectively meaningless. Until the housing number has been corrected, it is not possible to break it down into categories. The requirement is to meet the housing target, not to meet the number in the SHMA as stated in this Policy. The SHMA has been clearly demonstrated to be not fit for purpose. • Density figures for allocated sites must be agreed in consultation with landowners and should be based on robust analysis. • There are no character assessments that indicate the existing densities in any particular area. LSOA data which gives an indication of the densities in a wider area but there needs to be more direction to understand where densities should be preserved at more or less current levels and where (if anywhere) these might be increased through good design. Density could be used as a force for good in some areas where there is relatively low density development but little public realm and where social or environmental and deprivation issues are prevalent. 	<p>mix of housing at various densities appropriate to the location, for a variety of users.</p> <p>The methodology behind densities for specific sites is discussed in more detail in the Land Availability Assessment, but a planning application would enable more detailed consideration of an appropriate density for a site.</p> <p>Appropriate densities for various sites would be considered on a case by case basis in more detail once a planning application is submitted.</p>

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<ul style="list-style-type: none"> Housing density policy needs to be more clearly defined and the issue of high-rise developments, which would be immensely damaging to Guildford, should be confronted. 	
<p>Density – specific sites</p> <ul style="list-style-type: none"> Density and building heights -for example, along the River Wey to the north of the town centre -could, through careful master planning, deliver substantial numbers of homes whilst leaving the key views to and from the north-downs relatively unaffected. In other areas, however, height and mass would have a major and detrimental impact on long distance views and on street-scenes. The accompanying Planning and Design Analysis Document shows that the Land at White Horse Yard can deliver a density of circa 40 dwellings per hectare. opportunities created by new strategic development, notably the new settlement at Wisley, it is important that a suitable reference related to the opportunity to create new character and hence a density reflective of that new character is included. Attractive higher density redevelopment to enhance Park Barn and support the needs of the Hospital and Research Park is preferable to nearby green field development below the Hog’s Back. There is no available evidence that this policy is being applied in relation to Site 69, a proposed development on the boundary with Bookham, which is in the existing Green Belt close to Effingham Village. Any proposed development must adhere to this policy and be refused if the density does not match the local area and character of Effingham Village and Bookham. the stated policy regarding housing mix and density is inconsistent with the actual proposals. The proposed development of 434 homes on 3 sites in West Horsley is at a considerably higher density than we have currently in the village high density housing is completely out of character with the existing village (West Horsley) and contrary to the statement in the local plan that new residential development should respond to "to local character, context and distinctiveness"; the scale of the proposed development would have a devastating effect on the village Policy 3 Homes for all says residential densities will vary depending on the local area. This has not been applied in the case of West Horsley. Although the policy states that density will vary dependent “upon the local area context and character” the number of houses planned for the designated developments areas in Horsley and the other Green Belt villages indicates that this policy has already been forsaken There is enormous scope for higher density developments along Walnut Tree Close to take advantage of the river frontage and access to the town centre and 	<p>The policy states that new residential development is required to make the best use of land whilst responding to local character, context and distinctiveness. This retains a degree of flexibility towards density.</p> <p>The wording of the reasoned justification on densities (paragraph 4.2.8) has been expanded to include considerations when assessing planning applications, such as established street patterns, plot sizes, spaces around buildings, relationship with nearby buildings as well as form, massing, height of existing buildings and structures and materials.</p> <p>Appropriate densities for various sites have been considered in more detail in the Land Availability Assessment and would be considered on a case by case basis once a planning application is submitted.</p> <p>Opportunities for new development to create a sense of place are addressed in Policy D1.</p>

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<p>mainline station. The town centre master plan should develop these opportunities</p>	
<p>Density – heights of buildings</p> <ul style="list-style-type: none"> • Developments above 4 or 5 storeys would be unacceptable in Guildford due to topography and of views into and from the town. • Height of buildings in a town with distant views is very important and should not normally exceed 5 storeys. too much recent development has been of large housing stock that take up large areas of land with few occupants. • generally low rise but in the centre of town centres and larger villages up to say 4 to 6 storeys would be acceptable. 	<p>Potential heights of proposed buildings will be considered on a case by case basis through a planning application. An additional sentence has been added (4.2.8) which considerations include height of existing buildings and structures.</p> <p>Further detail on design will be included in the Delivering Development document and /or supplementary planning guidance.</p>
<p>Density – Green Belt</p> <ul style="list-style-type: none"> • development of homes on Green Belt sites at much higher densities that currently exist would be completely out of character with the existing mix of housing styles and layout of the Parish. • do not support high density housing especially on Green Belt sites. It provides greater developer profits and not a greater quality of life for residents • The housing mix and density supports high density housing in the Green Belt. • If Green Belt land is used it is essential that it is used efficiently whilst reflecting character of area • Development of Green Belt sites is at a higher density than currently exist in the village and would be totally out of character with the existing housing mix and the layout of the village. • Will result in high-density housing in the Green Belt • The Borough Council has failed to publish density proposals for the greenbelt area, particularly inset villages which promote urbanization. • Will lead to high density housing in the Green Belt. 	<p>Appropriate densities for various sites would be considered on a case by case basis in more detail once a planning application is submitted.</p> <p>The reasoned justification on densities (paragraph 4.2.8) has been expanded to include consideration when assessing planning applications, such as established street patterns, plot sizes, spaces around buildings etc.</p>
<p>Density - baseline</p> <ul style="list-style-type: none"> • The Policy wording should be adapted to include reference to a minimum baseline density per hectare. • the Council should set a <u>minimum</u> baseline density per hectare. It is suggested either a blanket minimum density of 30 dph or potentially a sliding scale between greenfield and brownfield sites – should be based on robust analysis and agreed in consultation with landowners/developers • To ensure that the most productive use is made of any site released for development it is recommended that the Council set a minimum baseline density per hectare. It is suggested either a blanket minimum density of 30 dph or potentially a sliding scale between greenfield and brownfield sites. 	<p>It is not the intention within this strategic policy to set a minimum baseline density per hectare. Appropriate densities for various sites would be considered on a case by case basis in more detail once a planning application is submitted.</p>
<p>Density – range</p> <ul style="list-style-type: none"> • Previous versions of the plan were more precise in advising on housing density 	

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<p>by area -40 dwellings per hectare (dph) for extensions to urban areas and new settlements, 30 dph for extensions to villages. This policy seeks to advise rather than control development</p> <ul style="list-style-type: none"> • Lower densities of 20-30 dwellings per hectare may be appropriate to retain character in some parts of garden suburbs and villages. 30-40 dwellings per hectare will often be an appropriate range, with building height confined to 2 -3 storeys. • Wouldn't it be safer to specify some density limits or ranges? The lack of precision in density in the Plan will surely leave the Council completely open to challenge/appeal from developers • it is important that densities on brownfield sites do not exceed the current planning levels of 30-50 dwellings per hectare and that developments include open spaces, play areas and leisure facilities. They should meet the needs of a wide age-range including adolescents and adults and should not be built just for small children • Previous versions of the plan were more precise in advising on housing density by area. The Issues and Options document stated: "These are 40 dwellings per hectare (dph) for extensions to urban areas and new settlements, 30 dph for extensions to villages." Whilst the policy indicates that residential densities will vary dependent upon the local area context and character and the sustainability of the location, this seeks to advise rather than control development. 	<p>It is not the intention to set a range of density per hectare within this strategic policy. The focus is on making the most efficient use of land whilst responding to local character, context and distinctiveness.</p> <p>Appropriate densities for various sites would be considered on a case by case basis in more detail once a planning application is submitted.</p>
<p>Specialist Housing</p> <ul style="list-style-type: none"> • Support this policy • Would like specifically highlighted, the need for accommodation for adults with learning difficulties and special needs. I would hope that the council have worked closely with Surrey County Council to make sure that opportunities are found to bring specialist housing back into the county. A detailed analysis with Surrey County Council specifically on specialist housing is very necessary. • Local nursing homes on the Hogs Back and at Puttenham are highly Successful • support the provision of specialist forms of accommodation in appropriate sustainable locations, taking into account local housing needs. • Much credence is being given to Specialist Housing yet there is little evidence of this being implemented. Why is student housing being compared with Retirement Housing in the SHLA. Both have different needs. • We have two hostels in Guildford. There is an increased need for more beds. Surrey has a large population of people who misuse drugs and alcohol. SADAS and other community services do sterling work supporting people with drugs and alcohol problems, but they need to be much better supported to cope with a large increase in population, as the NHS can't (or often won't as people are not deemed 'severe enough to warrant NHS treatment) help 	<p>Additional wording on specialist accommodation has been added to the reasoned justification of the policy to include people with learning difficulties. It is understood that Surrey County Council are undertaking work on the need for specialist accommodation for adults with learning difficulties and special needs.</p> <p>The SHLAA has been replaced by the Land Availability Assessment, which identifies separate sites for student accommodation and C2 care or residential homes; they are treated as different needs.</p> <p>This policy acknowledges the different types of accommodation needed and aims to deliver a mix of accommodation and a flexible housing stock that can be more readily adapted to suit the occupants needs.</p>

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<ul style="list-style-type: none"> • There is increasing need for specially adapted housing for those with chronic ill health, those who are elderly and those who need a more supportive environment. • It is not accepted that for those who are extremely frail i.e. in need of nursing care need to be in accommodation close by to other areas for accessibility by the residents. As such thought should be given to the use of Henley Park which at one stage was proposed for elderly housing. 	
<p>Specialist Housing – homelessness</p> <ul style="list-style-type: none"> • The Homelessness Strategy is a key document in this regard and we would want to see it at the heart of the local plan insofar as no-one in Guildford should be at risk of homelessness because there isn't enough affordable, good quality housing and people are sufficiently supported to remain in their homes. At this time this is particularly pertinent because of the restricted support to those on benefits if staying in too large, long term family homes (the spare room subsidy) or not able to afford high private sector rents when benefits have been lowered (the benefit cap) 	<p>Guildford Borough has a Homelessness Strategy which addresses this issue in greater detail. Providing more affordable housing will help to address housing needs including that of homeless people and this is addressed in Policy 4.</p>
<p>Students - general</p> <ul style="list-style-type: none"> • Student numbers should be removed from the SHMA calculations. • Wide choice of homes should also be available for students who are not a homogenous group and have different needs • The student policy must be a coherent one which enables the learning sector to thrive but which ensures there is no detrimental effect on the wider community. • The university and other educational centres should be encouraged to develop their own land for student accommodation. No further allocation or permissions should be granted until they have developed their own sites. • Students at Guildford University are the only migrants that the borough needs in significant numbers; they should be accommodated in dedicated buildings around the University. • some tensions created by those living in rented student and temporary accommodation, often in houses of multiple occupation. I am pleased to see acknowledgement of this in the Plan. However I would hope that there are policies beyond this document that aim to reduce these tensions. I would like to see actions that enhance the important positive contribution that our students, visiting research staff and academic staff make whilst also diminishing the challenges that comes from 'visiting' groups of residents. • Student accommodation can be provided much more densely than family homes (as it allows larger groups to share communal areas and facilities), which allows the University to provide safer and better quality accommodation (better value for the money) on campus than can be found in converted houses in the town. • the students of the University and their requirements for accommodation are 	<p>Paragraph 159 of the NPPF states that the SHMA needs to address the need for all types of housing, including affordable housing and the needs of different groups in the community. For Guildford this includes the needs of students.</p> <p>Planning Practice Guidance: Methodology – assessing housing need 'How should the needs for all types of housing be addressed?' was updated on 26/03/15 and adds the following paragraph:</p> <p><u>Student housing:</u> Local planning authorities should plan for sufficient student accommodation whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus. Student housing provided by private landlords is often a lower-cost form of housing. Encouraging more dedicated student accommodation may provide low cost housing that takes pressure off the private rented sector and increases the overall housing stock. Plan makers are encouraged to consider options which would support both the needs of the student population as well as local residents before imposing caps or restrictions on students living outside of university-provided accommodation.</p> <p>Students have a free choice over where they choose to live. Some students do choose to remain in Guildford after completing their studies.</p>

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<p>different from other education establishments in town and should be treated on a different basis: There is a strong case (on grounds of sustainability and performance outcome) that accommodation should be provided for the vast majority of University students on campus. There will be some exceptions (mature students with families, local students preferring to remain with their parents).</p> <ul style="list-style-type: none"> • The remaining student accommodation should be distributed across the urban area of the town to avoid the creation of student ghettos and encourage the development of a society that includes students and permanent residents. • Effects of Buy-to-let impact on first time home buyers. • I do not want to live in Guildford after I leave university. I do want the Green Belt and countryside to be protected. Do not seek to build a house in order to provide for my needs & don't assume I will stay in the area, because I do not plan to do this, nor will most of my friends. You should adjust your projections as a result. The assumptions you are making about my generation are wrong. Focus on those who have a stake in the area Those who know and understand an area should be listened to more carefully than students who are only moving through and spend 9 short terms there living focussed on the University and its activities. The local town is an irrelevant backdrop. • The Local Plan needs to make reference to student accommodation both for students and residents and their communities. • The treatment of student housing has a major impact on the immediate surroundings of the town centre and in terms of development in areas such as Walnut Tree Close. The University and its corresponding knowledge based businesses are key success factors for Guildford and GVG is keen to ensure that a II elements II of the housing market are fit for purpose • the multiple occupancy of former affordable housing which is now used for students • The University and other colleges may be excellent and do provide employment, but the accommodation of student population within the the community, particularly in west Guildford, has not been generally acceptable to local residents. The students are not part of the community and some subject residents to high levels of noise and unacceptable behaviour. To allow the University and other colleges to expand further, can only cause further problems. In addition, the development of internet education courses may reduce the demand for student attendance at Universities, which could limited University development in the near future. • page 27 - How or where do increased student flats/units fit into this table? • Oxford Local Plan policy; "Core Strategy Policy CS25 – Student Accommodation seeks to manage the number of students in the private housing market. It does 	<p>From the Draft Local Plan Strategy and Sites consultation responses we know that many local residents are concerned about the amount of students living in market housing which could potentially be occupied by families. We also recognise that students have a free choice over where they choose to live.</p> <p>The University is building more student accommodation on its Manor Park campus. The University currently has over 5000 student bedspaces at its various sites.</p> <p>The SHMA 2015 has looked at student numbers. It is not within the remit of planning to restrict the number of students living off campus. The university is already within the top 5% in the UK for provision of accommodation on campus.</p> <p>The example of Oxford's approach to student housing has been looked at and we appreciate the details provided.</p>

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<p>this by only allowing planning permission to be granted for additional teaching or administrative accommodation where it can be demonstrated that the number of full-time students, at whichever University is proposing the development, who live in Oxford outside University-provided accommodation, does not exceed 3000 at the time of completion. It must also be demonstrated that all future increases in academic or administrative floor-space must be matched by a corresponding increase in student accommodation. "Policy CS25 is used when assessing planning applications by the two universities. If the evidence is that the university does not have sufficient student accommodation then either: 1. Planning permission would be refused if the institution had no way of complying with the policy; or 2. If it was a timing issue, then either a condition or obligation would be imposed at the time of granting planning permission which would prevent development or occupation of the development until sufficient student accommodation was provided (a so-called "Grampian" style condition). "Following a binding recommendation made by an independent Planning Inspector, the Core Strategy removes the Local Plan policy condition that restricted occupancy of new student accommodation to Oxford Brookes University or the University of Oxford. Instead Policy CS25 includes the requirement that student accommodation be restricted to occupation by students in full-time education and on courses of an academic year or more. Any speculatively built student accommodation may be occupied by students of private colleges or language schools provided they are studying full-time and are enrolled on a course for at least one academic year. "The above restriction does not apply outside the semester or term-time, provided that during term-time the development is occupied only by university students. This ensures opportunity for efficient use of the buildings for short-stay visitors, such as conference delegates or summer language school students, whilst providing permanent university student accommodation when needed. When the Core Strategy was adopted, the previous Local Plan policies relating to the University of Oxford and Oxford Brookes University were superseded. However, policies in the Local Plan relating to private colleges have been saved and therefore remain relevant. "Local Plan Policy ED.10 – Private Colleges: Student Accommodation indicates that planning permission will only be granted for the establishment of new educational establishments or the expansion of existing ones where the applicant agrees to a limit on the overall number of students, and to</p>	<p>The current SHMA calculates student bedspaces in halls of residence or purpose built student accommodation on campus this to be 2425 bedspaces over the plan period.</p> <p>Buy-to-let can also provide an important source of housing to all members of our community.</p> <p>We appreciate that students are not a homogenous group and they have various accommodation needs.</p> <p>It is not considered appropriate to included text along suggested lines as we have not done so for other organisations that contribute to the prosperity of the borough. The wording of student section has been reviewed.</p>

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<p>accommodate the students in other educational premises, purpose built accommodation or family lodgings.” [see: http://www.oxford.gov.uk/Library/Documents/Planning/Student%20Numbers%20in%20Oxford%20Report%20April%202012.pdf] Guildford Borough Council should impose similar requirements (with a limit, say, of 1,750 students living off-campus).</p> <ul style="list-style-type: none"> • Wide choice of homes should also be available for students who are not a homogenous group and have different needs. • Add sentence on continuing growth of University is important to prosperity of borough and local plan should include provision for future student needs. Delete sentence requiring any increase in student population due to increase in floorspace being matched by student accommodation provision. 	
<p>Student numbers and the SHMA</p> <ul style="list-style-type: none"> • Current student numbers and future numbers are determined by the Policy / commercial decisions of the University. Such student numbers are not predictable by trend analysis, nor discernible by reference to a settled and deliverable University Long Term Plan – there is not one at present. Neither is it possible to know the University’s land utilization plans are or its intentions about provision of student accommodation in University provided accommodation. All we can be certain of is that a University is in the business of bringing ‘bodies’ to its site. • I object to the numbers, which must be revised downwards and not backdated, applying only to 2016-2031. The student accommodation factor should be removed from the calculation entirely and subjected to a separate study as it totally distorts the figure • Students are included in the housing needs calculation in full, one student counting as a member of the population. The housing calculation does not allocate a student room on a one-for-one basis but on a fractional basis in any case - and now GBC is proposing to allocate only incremental housing provision. This is a deliberate distortion. One approach to this might be to exclude student numbers completely from the SHMA. This would be consistent with the comment in 4.19 that "Student accommodation needs are considered as separate from general housing needs". If student needs are separate from housing provision, then they should not be included in the assessment of the population size in order to determine the needs for new housing. This distortion is particularly serious since the 20-24 age band - including most but not all of the student population in the borough – is the single largest age band in the borough, representing approximately 8% of the population. This distortion in the housing analysis must be corrected so as not to cause major planning errors. 	<p>The University predicts to increase its total student population by 3,300 in the next 10 years up to a maximum of 6,300 by 2033.</p> <p>The growth aspirations of the University of Surrey are dependent upon the proposals already secured through their extant planning permission. We cannot control their numbers growth so long as they work within this permission.</p> <p>The final West Surrey SHMA which covers the period 2013-2033 identifies a separate need for student bedspaces based on growth expected at the University of Surrey. It also includes an additional uplift for Guildford for general C3 housing to take account of the element of student growth in population that will continue to choose to live in general market housing rather than student halls.</p> <p>The West Surrey SHMA has identified separate figures for students living on campus and students that will live within the household population. A detailed response on the Students and migration /demographic projections is in the section below.</p>

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<p>Student accommodation counted in overall housing figures</p> <ul style="list-style-type: none"> Students are included in the housing needs calculation in full, one student counting as a member of the population. The housing calculation does not allocate a student room on a one-for-one basis but on a fractional basis in any case – and now GBC is proposing to allocate only incremental housing provision. This is a deliberate distortion. One approach to this might be to exclude student numbers completely from the SHMA. This would be consistent with the comment in 4.19 that “<i>Student accommodation needs are considered as separate from general housing needs</i>”. If student needs are separate from housing provision, then they should not be included in the assessment of the population size in order to determine the needs for new housing. This distortion is particularly serious since the 20-24 age band – including most but not all of the student population in the borough – is the single largest age band in the borough, representing approximately 8% of the population. This distortion in the housing analysis must be corrected so as not to cause major planning errors. “Any additional student accommodation built over and above projected need (as identified in the most up to date SHMA) will count towards the general housing requirement, based on the amount of accommodation it releases into the general housing market.” In fact, as clarified by Nick Boles in ministerial guidance and letters to our MPs, all built student accommodation should count towards the general housing requirement, not only the additional student accommodation. increasing the level of student accommodation in the private housing sector actually reduces the use of the private rented sector by student residents. This increases housing supply elsewhere. Paragraph 4.19 is therefore supported in the recognition this use offers to overall supply. SHMA should reflect guidance from MP that on-campus student housing can be counted against local housing needs. This approach is also sound as it is consistent with PPG Paragraph 039 (March 2014) that highlights that student accommodation, including halls of residence, can be included towards a Plan’s housing requirement; based on the amount of accommodation it releases in the housing market. Your explanatory point at 4.19 regarding student accommodation seems to show a flaw in your projected figures as all student accommodation will be counted to meet the projected need which is identified in the SHMA. This is in direct conflict with a statement by Nick Boles MP (former Parliamentary Under Secretary of State – Planning) in ministerial guidance and letters the Borough’s local MPs that “<i>Student housing makes a significant contribution towards housing supply by taking pressure off demands on local housing stock. This Government has clarified guidance to make it clear that local authorities can include student housing in the calculation of, and the monitoring</i> 	<p>The Governments’ Housing and economic land availability assessment methodology (NPPG, para 038 ref ID 3-038 20140306) states that all student accommodation, whether it consists of communal halls or residence or self-contained dwellings, and whether or not it is on campus, can be included towards the housing requirement, based on the amount of accommodation it releases in the housing market. Notwithstanding, local authorities should take steps to avoid double-counting.</p> <p>It is our understanding that the approach in NPPG is that student needs should be identified separately from general housing needs. It follows that student accommodation to be provided will meet that separate identified need and generally speaking will not go to meet general housing needs. However, the guidance also recognises that if student accommodation is provided, it may be occupied at least in part by students who would otherwise occupy general market housing. The net effect of this is to release housing to the general market. Therefore the provision of new student accommodation can result in the release of housing to meet general housing needs. Where this occurs the guidance is saying the extent of that release can be counted towards meeting general housing needs.</p> <p>The DCLG guidance on Definitions of general housing terms (November 2012) defines purpose built (separate) homes, such as a self-contained student flat clustered with four to six bedrooms, as counting as one dwelling.</p> <p>In summary, student bedspaces can only be counted towards general market housing based on the level of market housing they release. We can therefore only count those bedspaces that are delivered which are over and above what our student bedspace need is calculated as. It is important to note that one bedspace does not equal one dwelling.</p> <p>We will monitor the level of student accommodation that is delivered and, should we exceed the need identified in the SHMA, then we will count these towards our general housing target as it is considered that at this stage they would begin to release homes in the general market.</p> <p>Focusing on the future growth of the University of Surrey the SHMA estimates that up to 2,425 student bedspaces are required on campus and 500 additional market dwellings (25 dwellings per year based on 4 students per dwelling) over the period 2013-2033 are needed to meet the growth in the student population. This is based on the assumption that 50 to 60% of students will live within halls and purpose built</p>

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<p><i>against, local housing needs regardless of whether they are communal sited or on a university campus”.</i></p> <ul style="list-style-type: none"> • The housing number must be corrected to take include student housing in the calculation – and to include the maximum permissible number. • <i>ALL students housing counted towards the 13,040 target.</i> • As specifically clarified in ministerial guidance and letters to our MPs, all built student accommodation should count towards the general housing requirement, not only additional student accommodation. An incorrect approach to this issue introduces huge distortions into the housing figure. • MP Paul Beresford – I met with Nick Boles personally to discuss this point and following this meeting received written confirmation that “Yes. Student housing makes a significant contribution towards housing supply by taking pressure of demand for housing stock. This government has clarified guidelines to make it clear that local authorities can include student housing in the calculation of, and the monitoring against, local housing needs, regardless of whether they are communal or sighted on a university campus. This is another very important point which had not been fully appreciated at the time the Local Plan was put together and it is vitally important that the council consider this development and reduce the planned number of new houses accordingly • Point 4.19 is flawed. It notes "Any additional student accommodation built over and above projected need (as identified in the draft SHMA for Guildford alone, which is all that has been published at the date of writing) will count towards the general housing requirement, based on the amount of accommodation it releases into the general housing market." In fact, as clarified by Nick Boles in ministerial guidance and letters to our MPs, all built student accommodation should count towards the general housing requirement, not only the additional student accommodation. This is worryingly distorting and inflates other housing need to a significant degree. The proportion of student accommodation that is provided by the University and other academic institutions should be monitored formally. • Unutilised permission for student accommodation should be enforced as a precondition for further development, as is specifically encouraged in the ministerial statement by Nick Boles dated 9 March 2014 which noted that "councils should also be able to consider the delivery record (or lack of) of developers or landowners, including a history of un implemented permissions; this will also serve to encourage developers to deliver on their planning permissions". Students are included in the housing needs calculation in full - one student counts as a member of the population. The housing calculation does not allocate a student room on a one-for-one basis but on a fractional basis in any event – and now GBC is proposing to allocate only incremental housing 	<p>student accommodation.</p>

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<p>provision. This appears to be a deliberate distortion and the reasons for this bear examination. One solution to this might be that the student numbers should be excluded from the SHMA in their entirety, which would seem consistent given the comment in 4.19 that "Student accommodation needs are considered as separate from general housing needs." If student needs are separate from housing provision, then why are student numbers included at all in the assessment of the population size in order to determine the needs for new housing? In fact, this distortion is particularly acute since the 20-24 age band - including most but not all of the student population in the borough- is the single largest age band, representing approximately 8% of the population of Guildford. This distortion in the housing analysis must be corrected since it will give rise to serious error in the planning process.</p>	
<p>Students and migration /demographic projections</p> <ul style="list-style-type: none"> Students/20-24 year olds represent the largest group in the forecast. The majority of these are students yet they have been treated "normally" for future projections ie remain in the Borough, form families etc. However, they leave. The ONS has agreed that the methods used in the calculations are wrong. The population growth in the past has been due to international migration at around the time of the enlargement of the EU. This is unlikely to be repeated and central Gov is pledging to limit this net migration in to the UK. This historic growth driver cannot be expected to continue. The University is a main driver of growth of the Borough. From numbers I have seen from the ONS 2001 Students = 7004 Population =129,800 2011 Students = 10727 Population = 137,200 Student Growth = 3723 or 50.3% of Population growth of 7400. When you add the lecturers & families, support staff etc the University is a considerable factor in the historic growth rates. It appears to us that student numbers have been aggregated into the demographic and population data upon which trends have been identified and forward population projections and profiles made. Yet at 10% of Guildford's population they will represent a significant 'segment' within these projections – projections which are a key determinant of identifying 'housing need'. And certainly at 10% of the community they will have a significant impact both directly and indirectly on the local market and housing stock utilization. But just what the scale of that impact will be will depend on their choices and options for accommodation. He basic translation of undifferentiated population numbers and demographic profiles into projections of household formation rates and consequent additional houses needed in the Borough, based on standard assumptions regarding household generation dynamics is certainly not going to produce a reliable answer for difficult decisions about how many additional houses to build each year until 2031. 	<p>The NPPF requires that our assessment of housing need takes account of migration. University expects an increase in international students in the coming years, which we must take account of in assessing future need. We can only consider the evidence that is available and cannot predict what future changes in Government policy may be. We will continue to update the SHMA as and when new evidence becomes available.</p> <p>Whilst international migration is a significant proportion of our projected growth it is not possible to simply remove a component of population change and continue to rely on the figures in the remaining components of population change as this does not acknowledge the relationship between them. This is particularly the case between international and internal migration patterns.</p> <p>Guildford's population is expected to grow much more strongly for younger age groups than the national population (younger than 29 age group) and generally weaker for older age groups. Younger age groups are much more likely to be mobile (i.e. migrate outside of Guildford) than older age groups. The effect of this type of population change means that our population is growing in the age groups that are more likely to migrate at a greater rate than nationally. This means that Guildford's level of out-migration is also expected to increase by a higher proportional amount thus reducing the level of population growth and associated housing need.</p> <p>The SHMA at Figure 17 and Figure 18 sets out the age groups of those people that have in the past migrated into Guildford from elsewhere in the country and internationally. There is clear spike in the 18 year group for internal in-migration whereas there is a bigger spike for international in-migration occurring between the late teens and mid-twenties age group. The greater comparative growth in younger</p>

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<ul style="list-style-type: none"> The demographic projections are distorted by the effect of student numbers at Surrey University, for example, which inflate the need for housing. Work to review and revise the statistical analysis has not been done or disclosed – as requested by the Council’s own Scrutiny Committee. The requirement of NPPF para 159 has not been properly met. Students in this Policy are being treated wrongly as permanent residents, and the blip in the student population before student fees increased is erroneously taken as a long-term trend. 	<p>people in Guildford is therefore being principally driven by international in-migration. Given this is the age range that is more likely to migrate out of the borough either internally or internationally, a greater increase in this age range results in a greater comparative growth in the level of out-migration that is projected.</p> <p>It is for these reasons that one cannot state that the growth is due entirely to international in-migration because without this element of growth, Guildford would not see the level of internal out-migration that is forecast to occur.</p> <p>A SHMA that did not include international migration would not define our full objectively assessed housing need and would therefore not be considered robust or sound by a planning inspector. The level of international in-migration is a function of what makes Guildford and is due to factors such as the Royal Surrey County Hospital, University of Surrey and Surrey Research Park.</p> <p>Appendix C of the SHMA looks at this issue in more detail.</p>
<p>Student 30% and 60% target, use of term ‘eligible’ and ‘on University owned land’</p> <p>The target of housing 60% of students in University owned accommodation is extremely high and above the norm for universities. This type of accommodation is inefficient as it is not used intensively all year round. Better to leave the private sector to cater for increased student numbers through letting privately owned flats.</p> <ul style="list-style-type: none"> I expect that the University will argue quite rightly that students live where they want to and they are entitled to do so. You are therefore imposing unrealistic and potentially enormously expensive conditions on a University whose record on accommodating students has been outstanding throughout 75% of University students should be housed on campus. when a 60% target was set in 2003, it was ignored and that the University does not provide clear data. Monitoring of performance will be essential. To be effective, the policy should only refer to campus accommodation. Help with recruitment and retention of staff. However, the proposed requirement for the University to accommodate 60% of University students on site does not look realistic or workable. The hospital itself has a student population of nurses/medics and others and so we are aware that students vary in their accommodation needs and are relatively flexible in where they choose to live. This policy will not change that and would appear difficult, if not impossible, to enforce. We would suggest that this requirement is deleted and replaced with a policy that broadly encourages new purpose-built accommodation in appropriate locations well-related to the University and the hospital. An appropriate cap should be set for other higher education establishments in 	<p>The wording of the policy and reasoned justification with regards to student accommodation has been amended. The wording has retained the expectation that 60% of the University of Surrey eligible student population (full time equivalent) is to be provided on campus. The expectation for other higher education establishments to provide student accommodation should they expand has been removed, and the wording ‘University owned land’ has also been deleted.</p> <p>The target of 60% of University of Surrey student accommodation on campus originates from the last Local Plan, when the Manor Park site was removed from the Green Belt. It is considered important to maintain a percentage of student accommodation on campus in proportion to the increase in student numbers to help minimise the impact on local housing and the community and to provide students with a choice of accommodation to meet their needs. A figure higher than 60% is not considered reasonable and would not offer students the choice and flexibility of where to live.</p> <p>The University of Surrey aim to house 50 to 60 per cent of ‘eligible’ students on campus. The University consider that providing campus accommodation over the 50 to 60 per cent rate would see higher vacancy rates as a proportion of students will</p>

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<p>Guildford</p> <ul style="list-style-type: none"> • UNIS can continue to expand provided 60% of FTE students housed – the remaining uncapped 40% will continue to exert upward pressure on housing costs to the detriment of local people. • The UNIS should have a separate policy requiring it to build accommodation for a great % of students and to build extant pp's • The expectation is that the University should provide for 60% and that other institutions should provide for 30%. These figures seem too low. The pressure on local rented housing would be reduced if these figures were increased. Not clear why the 'other higher educational establishments' need only provide 30% accommodation. Advice is that there are 10,000 such students in Guildford. • This policy is unspecific. One shortcoming is the lack of specific control on the proportion of the university students to be housed on campus. This should be 75% to free smaller rental properties and increase council tax • The University first undertook to achieve a 60% target in 2003 (Manor Farm Master Plan (2003), Section 5.2) when it lobbied to have Manor Farm released from the Green Belt and has so far failed to achieve it, and so monitoring of their performance is crucial • Does not place enough emphasis on ensuring that further and higher education bodies provide sufficient accommodation for their students. The Uni of Surrey has built much accommodation over recent years and has the space at Blackwell Farm to provide more, which could be arranged in tandem with Housing Associations if appropriate as in the past. Other colleges should also be expected to come nearer to the 60% provision expected of the University rather than only 30% as stated in Policy 3 of the Plan • Not clear why other higher educations are expected to provide 30%, which appears discriminative. Aspiration is unrealistic and unjustified. University students have same rights as other members of the public and cannot be compelled to live in University accommodation. • Cannot expect University to build on campus accommodation beyond demand – which is 50 to 55% of eligible students. • 30% of Merrist Wood students should be housed on campus. • It should be policy that the University is required (not 'expected') to provide accommodation for a minimum of 60% of its students. • Why are higher education establishments other than the University of Surrey "expected" to provide "up to 30 per cent" student accommodation whereas the university is "expected" to provide a "minimum of 60 per cent"? The expression "up to 30 per cent" effectively imposes no requirement on these institutions at all. • How to enforce 60% of Surrey University students should be housed in University 	<p>continue to choose to live off campus within the local community.</p> <p>The University of Surrey continues to build new student accommodation on its Manor Park campus. A site has also been allocated within the Regulation 19 Local Plan Strategy and Sites at the University of Law, which if granted planning permission, could provide purpose built student accommodation (site A33).</p> <p>The term 'eligible' has been used within the West Surrey SHMA and for consistency it is also used within the Regulation 19 Local Plan Strategy and Sites. The term eligible is defined within the reasoned justification accompanying the Homes for all policy (paragraph 4.2.19): it applies to students requiring accommodation in the locality and excludes those students not requiring student accommodation such as those on distance learning courses, year out placements, part-time students and those living in their own or family home.</p> <p>The Manor Park site was allocated for University purposes in the 2003 Local Plan. Outline planning permission for student and staff residences, buildings for research and academic purposes, support services, sports facilities, landscape and other associated works was granted planning permission in 2004.</p> <p>Since then the University has undertaken a significant amount of building at its Manor Park campus – over 1,800 bedspaces to date. There is outline planning permission to build a total of 4,171 bedspaces at Manor Park as set out in the Manor Park Masterplan. Over all University of Surrey sites this equals to a total of approximately 7,221 bedspaces. Building works are ongoing so this figure may need updating.</p> <p>The University continue to progress development on the Manor Park campus and there are two current planning applications for new student buildings with 200 and 953 bedspaces on the Manor Park campus.</p> <p>Applications for student accommodation outside campus' will be determined on their own merits.</p>

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<p>accommodation?</p> <ul style="list-style-type: none"> • The university should be pressed to build the student accommodation which they have contracted to and to build further properties on their land for up to 70% of their students. With such a large number of foreign students there should be no problem in filling these properties, releasing a large number of rentals in the town for locals • The University of Surrey has sufficient resources available within the land allocated to it and not presently bounded by green belt to house 75% of their students – for students from without the UK this would not seem unreasonable. This would be easily enforceable by making it a condition of acceptance of a place at the University. Other universities have conditions of residency that allow only those in their final year to look for accommodation outside of the University or for permission to be sought. • Why does the Policy state that 60% of students should be housed “on the University campus or on University owned land”,? The University target should be on the campus only – otherwise there is the opportunity to retain land at Hazel Farm, buy up land in town that is better suited to full-time Guildford residents, or build on its other landholdings, such as Blackwell Farm, where the need to do so can’t be demonstrated on sustainability grounds. • Object to wording requiring 60% student accommodation provided on campus or university owned land. Phrase eligible student is working definition not appropriate for use in local plan policy. No context on how this could be achieved and is an aspiration not a policy. • The term “eligible” should be removed from the students on campus % used for the calculations. It is not there in the 2003 plan or updates, is not clear what that means, and will allow manipulation by the University. The University is already misquoting the existing number. • We are appreciative of the proposed restriction of university accommodation to amount not exceeding 40% off-campus. • The scarcity of land in our area mean that even at 40% of the University Full-Time-Equivalent students plus the students at University of Law, the Academy of Contemporary Music, Italia Conti, Performance Preparation Academy, and any other further education establishments, there will be large numbers of dwellings unavailable to the market or for affordable homes. • The Parish Council considers that a 60% provision of onsite accommodation is quite modest. Students will of course live where they choose to live but it is only by restricting their access to the accommodation needed by local families that the fundamental shift will take place. Land and housing is scarce in Guildford • The policy as worded gives a carte blanche for the UNIS to continue to expand 	<p>It is not considered appropriate to place a cap on the number of students living off campus and it should be recognised that the university is within the top 5% in the UK for provision of accommodation on campus.</p>

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<p>provided that it has the ability to house 60% of its FTE students. The housing demand from the remaining uncapped 40% will continue to exert upward pressure on housing costs to the detriment of all local people in need of accommodation.</p> <ul style="list-style-type: none"> • The UNIS should be the subject of a separate policy which requires it to build accommodation for a greater % of its students, and that requires it to build out its existing extant permissions. • The University target should be on the Campus only - otherwise there is the opportunity to retain land at Hazel Farm, buy up land in town which is better suited for full-time Guildford residents, or build on other landholdings such as Blackwell Farm, where the need to do so can't be demonstrated on sustainability grounds. Little past evidence to show that the University has attempted to fulfil the target of 60% (first set in 2003), but has instead changed the target (from 60% to 40%) in order to meet it. Likewise it has successfully land banked several thousand units of housing, by not fulfilling a 'need' that was established in 2003. Adding 'University owned land' to the proposition would effectively remove any barriers for University growth which is unlikely to be acceptable to anyone outside the University. • 60% of students to be housed on the University campus or University owned land. This was a promise that the University made at the time of the Manor Farm development and it has failed to keep. Worryingly, the University states in 2009 Estates Plan that it is only targeting 42% of students on campus. This part of the policy needs tightening up to avoid the one sided relationship between the University and the Council that is the perception of residents. Additionally this target should be monitored and permission for further development predicated on the success of the University achieving this target. • There were firm commitments on accommodation supporting growth which have flagrantly not been enforced by GBC. We specifically refer to the University of Surrey's agreement to build 4790 student residences, and 300 staff residences. To date only around 1665 residences and 30 staff houses have been build, while the University has expanded by 5850 full time students (SHMA Appendix C). Other conditions in Section 16 of the 2003 2003 Local Plan remain unfulfilled, and section 16 itself was quietly expired in 2007 leaving a massive gap in housing in Guildford, and several local facilities never provided. The University has taken advantage of this and to our knowledge GBC has not monitored or managed the MPDB. GBC recently (August 20th planning meeting) announced that agreement known as the Manor Park Development Brief was old and not of serious weight. To WSVA, this makes a mockery of the local plan process. University committed to 60% of full time students on site. It currently admits to 54%, but with 11523 (under and post graduate) full time students (SHMA appendix C) and only 5100 accommodation units (SHMA Appendix C) this is calculated 44% on site. We 	

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<p>further aximizin that the current University Estates Plan of 2009 states clearly the University <u>only plans for 42%</u>, in direct breech of that 2003 agreement. We note the slight fall after 2011 is more likely to do with the introduction of student grants, than a plan reduction by the University as stated in SHMA Appendix C.</p> <ul style="list-style-type: none"> • For such an important indicator, the plan should state what the actual ratio is now and how it has developed over the past decade. Further it should be made clear that the indicator refers to the Surrey campus and does not include data referring to other sites at which the university operates. UNIS states that currently 54% of students live on campus but this is not verifiable and may not include all students • The draft Guildford SHMA suggests that the University’s expansion plans will attract further overseas students. The University will benefit financially from this and we therefore question why accommodation for them all is not provided on campus and the 60% target increased It is particularly of concern that the University has consent for campus accommodation that has not been built and that it is developing the veterinary school on the site of a proposed accommodation block which could have been sited elsewhere. • The target for student accommodation on campus should be a minimum of 85% across all full-time equivalent students. This would be in line with targets set by Oxford City Council. • If the university is to buy land in the town for student accommodation that could otherwise be used to provide housing for the general population then the situation is not improved, so the phrase “or on university owned land” should be deleted. • The policy as worded gives a carte blanche for the UNIS to continue to expand provided that it has the ability to house 60% of its FTE students. The housing demand from the remaining uncapped 40% will continue to exert upward pressure on housing costs to the detriment of all local people in need of accommodation. • The UNIS should be the subject of a separate policy which requires it to build accommodation for a greater % of its students, and that requires it to build out its existing extant permissions. • The University has not fulfilled the target of 60% of students living on campus (first set in 2003),but has instead reduced the target from 60% to 42% (in its 2009 Estates Strategy). It has land banked thousands of units of housing, by not fulfilling a “need” that was established in 2003. Removing the wording “University owned land” from this Policy would ensure that University growth is confined to Manor Park – the area that the 2003 Local Plan set aside for its growth over the next 30 years. • the University states in 2009 Estates Plan that it is only targeting 42% of students on campus. This part of the policy needs tightening up to avoid the one sided relationship between the University and the Council that is the perception of residents. Additionally this target should be monitored and permission for further 	

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<p>development predicated on the success of the University achieving this target.</p> <ul style="list-style-type: none"> • Not clear why other higher educations are expected to provide 30%, which appears discriminative. Aspiration is unrealistic and unjustified. University students have same rights as other members of the public and cannot be compelled to live in University accommodation. • should be higher than 60% • It has land banked several thousand units of housing, by not fulfilling a “need” that was established in 2003. Adding “University owned land” to the proposition would effectively remove any barriers to University growth – a growth that is unlikely to be acceptable to anyone outside the University. • The target for student accommodation on campus should be a minimum of 85% across all full-time equivalent students. This would be in line with targets set by Oxford City Council • There is little evidence to show that the University has attempted to fulfil the target of 60% of students living on campus • Students of the University and their requirements for accommodation are different from other education establishments in town and should be treated on a different basis: There is a strong case (on grounds of sustainability and performance outcome) that accommodation should be provided for the vast majority of University students on campus. • There will be some exceptions (mature students with families, local students preferring to remain with their parents). This isn’t unrealistic – top American Universities (which incidentally sit much higher up the international rankings than the University of Surrey) typically have more than 90% students living on campus • 60% of the University of Surrey eligible student population ...accommodation on their campus or on university owned land. There should however be recognition in the Policy that student accommodation is supported in appropriate locations outside the campus or University owned land. An arbitrary percentage based target should therefore not be applied. As previously stated, TCG’s site on Walnut Tree Close is such an appropriate site due to its proximity to the University and ease of access to the Railway Station and Town Centre • too much wiggle room in the policy as currently stated, which would result in a larger number of students living off campus than written in the policy and the percentages quoted mean that the numbers living off campus are too high • local plan policy imposes an absolute cap on the number of students living off campus and a figure of 1,500 students (which equates to approximately 85% of the population) would be a good target. As the student population grows, the percentage of students living on campus would grow too. • Appropriate that the local plan policy imposes an absolute cap on the number of students living off-campus and a figure of 1,500 students (approximately 85% of 	<p style="text-align: center; opacity: 0.5; font-size: 48px; font-weight: bold;">Draft</p>

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<p>the population) would be a good target. Limit numbers of students living off campus. As per Oxford</p> <ul style="list-style-type: none"> • Few of the promises made then by the University have been fulfilled, and GBC have been remiss in not holding them to their promises, for example, by not granting any further planning permissions until progress towards agreed targets (such as 60% of students to be accommodated in university residences) was made. So I support this policy but object to the way that GBC are failing to monitor and implement this policy. • The requirement on the University for 60% of students to live on campus or on owned land could be met by the purchasing of housing or land. How would that help the housing situation in Guildford? • The policy as worded gives a carte blanche for the UNIS to continue to expand provided that it has the ability to house 60% of its FTE students. The housing demand from the remaining uncapped 40% will continue to exert upward pressure on housing costs to the detriment of all local people in need of accommodation. • Cannot expect University to build on campus accommodation beyond demand – which is 50 to 55% of eligible students. • The wording “eligible students” has not been defined in the draft plan. Without defining this, the University could argue that this means students on fulltime courses who do not live in Guildford etc. The original policy from the Manor Park Development Brief refers to 60% of all full-time-equivalent students, no allowance is made for “eligible” and, as this was one of the conditions upon which Manor Farm was removed from Green Belt • Removing the wording “University owned land” from this Policy would ensure that University growth is confined to Manor Park the area that the 2003 Local Plan set aside for its growth over the next 30 years. • There is a precedent for local authorities in the UK to limit numbers of students living off-campus. Oxford University, for example, has nearly 20,000 students and only 3,000 of these live off-campus. This is because Oxford City Council recognises the problems with student accommodation in the city and stipulates limits in Oxford’s Local Plan. The same limits are placed on Oxford Brookes University. • The UNIS should be the subject of a separate policy which requires it to build accommodation for a greater % of its students, and that requires it to build out its existing extant permissions. • Object to wording requiring 60% student accommodation provided on campus or university owned land. Phrase eligible student is working definition not appropriate for use in local plan policy. No context on how this could be achieved and is an aspiration not a policy • In the paragraph on “Students”, the phrase “or on university owned land” should 	<p style="text-align: center; opacity: 0.5; font-size: 48px; font-weight: bold;">Draft</p>

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be deleted.	
<p>Student accommodation location</p> <ul style="list-style-type: none"> • Encourage purpose built student accommodation on or close to campus or other higher ed establishments or in town centre – will help vitality and night time economy and attract students away from family housing. • Students should be in dedicated buildings around the University. • The campus at UniS does provide accommodation very close to the town centre. This still enables students to feel very much part of the town • The large numbers of students living off-campus does have a bad effect on residential areas, including noise and disturbance, and upkeep of the property (as described in Issues and Options document). The impact is made worse by the void left in the town outside term time, when most students return to their parent's home. Houses and flats being let to students are therefore generally vacant for about 40% of the year. This isn't efficient, good for Guildford or good for the environment. There is a particular concern that the Council is proposing to remove areas of Green Belt when these properties could be used more efficiently. • Student accommodation can be provided much more densely than family homes (as it allows larger groups to share communal areas and facilities), which allows the University to provide safer and better quality accommodation (better value for the money) on campus than can be found in converted houses in the town 	<p>The University continues to build purpose built student accommodation on its Manor Park campus, and a site has also been allocated within the Regulation 19 Local Plan Strategy and Sites at the University of Law, which if granted planning permission, could provide purpose built student accommodation (site A33).</p>
<p>University of Surrey</p> <ul style="list-style-type: none"> • The University's expansion is vital to Guildford's future but has the supporting data on student housing has been updated • Has the University met previous similar commitments? Has the Borough Council made any requirement on it to do so? • The majority of private houses rented in Guildford are to University students. If these were reclaimed then there would be a considerable number of houses available for private occupation. • no reason why substantial student accommodation could not be built and completed within the nought to five year requirement • Census data and empty homes data arising from the census give a misleading picture -the student population are counted in their non-term-time residence and this leads to high levels of notionally empty properties in the town centre: • The expansion of the university has put direct strain onto the housing stock. The council should put more efforts into working with the university to ensure that the current expansion, and any further expansion, is met with additional student accommodation and does not rely on private landlords taking up even more local housing stock. There needs to be a much more intelligent usage of the current 	<p>We recognise the importance of the student population in Guildford and the contribution it makes to the development and growth of the local economy as well as contributing towards a highly skilled graduate workforce.</p> <p>Since the previous consultation the SHMA has been updated and the West Surrey SHMA was published in September 2015.</p> <p>We understand that the university is within the top 5% in the UK for provision of accommodation on campus. It continues to build student accommodation on its Manor Park campus and there are currently two pending planning applications for further student accommodation blocks.</p> <p>We recognise that students have a free choice over where they live and they are not one homogenous group.</p> <p>Brownfield sites have been looked at in great detail in our Land Availability</p>

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<p>housing stock available and where possible we should be looking to build specific housing types, such as student accommodation, to free up the current housing.</p> <ul style="list-style-type: none"> • Current draft plan states there is a shortage of “brownfield” sites in Guildford, but such sites available in Guildford are either reserved for commercial development or held by the University. • void left in the town outside term time – generally vacant for about 40% of the year. This isn’t efficient, good for Guildford or good for the environment. There is a particular concern that the Council is proposing to remove areas of Green Belt when these properties could be used more efficiently. • Expansion of Surrey University has distorted the property rental market in Guildford and contributed to housing shortage • In particular, there needs to be clear agreement with the University on student housing and a way of enforcing any agreement. • The University must take responsibility for providing Halls of Residence for its students, as they are transient group of people who place a massive burden on existing housing stock, contributing little to community sustainability and depriving long term residents of suitable accommodation • price it in such a way that it encourages students to live off campus • Why hasn’t GBC addressed the problem of Surrey University? Why haven’t they been forced to meet their 2003 commitment to build student accommodation? Students should be accommodated on site as other University’s are encouraged to do. Families around Guildford could move straight in to the freed up rented accommodation, taking the pressure off the need to build on Green Belt. • price it in such a way that it encourages students to live off campus by sharing what would otherwise be family housing • The number of homes provided should not exceed the capacity of the borough. • We also propose this be enforced with strong measures, be subject to public scrutiny and annual local plan review. GBC have failed in the scrutiny over the last 11 years, we recommend similar measures to Oxford be taken to control the university growth until this situation is fully rectified in favour of the people of Guildford. • Significant low end houses would be released to the market c1800 houses • Add sentence on continuing growth of University is important to prosperity of borough and local plan should include provision for future student needs. Delete sentence requiring any increase in student population due to increase in floorspace being matched by student accommodation provision. 	<p>Assessment.</p> <p>From these consultation responses we know that many local residents are concerned about the amount of students living in market housing which could potentially be occupied by families, and that are vacant outside term time. We also recognise that students have a free choice over where they choose to live.</p> <p>All first-year undergraduate students at the university are offered a place in University accommodation and International students are offered on-campus accommodation for the duration of their course. Many students in their 2nd 3rd and 4th years of study choose to live in Houses in Multiple Occupation (HMOs) with fellow students, some of which are University Managed Houses. If students live as a single household, the house is not an HMO, but is classed as a C3c dwellinghouse. You do not currently need planning permission to convert a house to an HMO for under six people.</p> <p>Student accommodation needs have been assessed in the SHMA (Appendix C).</p> <p>The wording of the policy has been reviewed and the reference to requiring any increase in student population due to increase in floorspace being matched by student accommodation provision has been deleted. Additional wording on the growth of the University is not considered appropriate and has not been included for any other educational establishment.</p>
<p>University of Surrey planning permissions</p> <ul style="list-style-type: none"> • University has consent for campus accommodation that has not been built and 	

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<p>that it is developing the veterinary school on the site of a proposed accommodation block which could have been sited elsewhere. Over 9,000 university students are estimated to live in private rented homes within the town and this is likely to increase with the opening of a medical, veterinary and business school. This represents a large number of more affordable homes that could potentially be made available to the wider community if the university had more accommodation on their own campus.</p> <ul style="list-style-type: none"> • Object to student housing being included in the figures when Surrey University has unused planning permission for over 2,000+ student housing. The university must build those homes and GBC remove them from the Plan. • Why has the University not fulfilled its obligations and provided sufficient student and staff accommodation on campus for which planning permission was granted a long time ago? • GBC have actively encouraged the University development through the new Veterinary School approval (against the agreement), and by selecting Site 60 as a strategic site, in the face of the evidence of wrong doing. • Surrey University has not met its 2003 commitment to provide accommodation on their own property, using up housing stock, while increasing student numbers • University of Surrey has been given permission to build student accommodation on its own land (which was taken out of the Greenbelt for this purpose) but has yet to deliver this accommodation, which would provide for in excess of 2000 students and would relieve pressure on the affordable end of the housing market. Surely this should be progressed before destroying our Green Belt? • Analysis of town homes occupied by students needed – if University built all planned student accommodation extra new build would not be needed and family homes would be freed up • University's failure to build onsite student accommodation under planning permissions previously granted. • Require that all historic planning permissions covering accommodation for 2,121 students be built (as student accommodation or affordable housing) before any new applications by the university are approved and before the university is allowed to make speculative gains from the development of Green Belt land it owns. • Student accommodation should be provided by Guildford University itself: it already has the Manor Farm site allocated for that purpose. • Student accommodation should be excluded from the overall numbers and provided on campus as previously agreed with Surrey University. It begs the question as to why the University has been allowed to get away with not doing this? 	<p>The Manor Park site was allocated for University purposes in the 2003 Local Plan. Outline planning permission for student and staff residences, buildings for research and academic purposes, support services, sports facilities, landscape and other associated works was granted planning permission in 2004.</p> <p>Since then the University has undertaken a significant amount of building at its Manor Park campus – over 1,800 bedspaces to date. There is outline planning permission to build a total of 4,171 bedspaces at Manor Park as set out in the Manor Park Masterplan. Over all University of Surrey sites this equals to a total of approximately 7,221 bedspaces. Building works are ongoing so this figure may need updating.</p> <p>The University continue to progress development on the Manor Park campus and there are two current planning applications for new student buildings with 200 and 953 bedspaces on the Manor Park campus.</p>

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<ul style="list-style-type: none"> The current housing needs of many people in the borough could be met if Surrey University built the student accommodation for which they already have planning permission, enabling students to vacate the private accommodation they currently occupy 	
<p>University of Surrey accommodation on campus and costs</p> <ul style="list-style-type: none"> They price it in such a way that it encourages students to live off campus by sharing what would otherwise be family housing. The University charges £127-£197 pounds per week, one of the highest levels outside London, and significantly more than the local housing market can demand or afford. The net effect is that students want to live off campus (as its cheaper), driving up local demand, and causing a housing problem in Guildford. 	<p>The rental cost of student accommodation is outside the remit of planning considerations.</p>
<p>University of Surrey car parks</p> <ul style="list-style-type: none"> The University has plenty of existing space (including open air car parks) which could be developed recommend that the number of students be agreed and enforced equivalent to 85% of fulltime students. This to be set and monitored 3-5 years period ahead with severe penalties for failure to comply. The University is maximizing⁹⁷ in extending surface car parks at Stag Hill (Approx 17Ha's) and Manor Park instead of building the student accommodation they committed to build when the greenbelt boundary was adjusted to accommodate the Manor Park campus. They are in essence creating housing demand so they can solve "the problem", this is a conflict of interests. It should be noted that Manor Park was originally designated as a "car free campus in 2003" when the greenbelt was previously rolled back to accommodate the University's expansion plans. We note that with the continuing development, including the Veterinary School, the University continues to submit planning applications for surface car parking and if the current requests are approved this will mean there will be 2,480 car parking spaces on their Stags Hill and Manor Park facilities. The latest approvals will also mean that the 5% traffic cap imposed on the Manor Park site will now be breached. 	<p>As far as we are aware the University has no current plans to redevelop its car parking areas on the Stag Hill campus.</p> <p>The University continues to build on its Manor Park campus, and there are currently two pending planning applications for student accommodation. Vehicular access to the student accommodation on campus is restricted by barrier.</p>
<p>University of Surrey Blackwell Farm site</p> <ul style="list-style-type: none"> Unclear about how it comes to be the case that The University of Surrey has been allowed to develop land at Manor Farm by way of leasing land to the Borough Council to provide an underused parking provision for the Park and Ride whilst claiming that they also need to expand their building programme into further areas of green belt along The Hogs Back and to the northwest of Guildford. Site 60 Blackwell Farm, next to this location, and wants to build 3000 houses (not 2250 as stated here) to help the Guildford Housing problem. We note there is a direct conflict of interest in the University, which has been allowed to continue by GBC. 	<p>The site at Blackwell Farm, off the Hogs Back has been allocated within the Regulation 19 Local Plan Strategy and Sites document as a site (A26) for mixed use development, which includes housing, retail, traveller pitches, self-build plots, employment land and a primary school. It is not proposed to use the land for University purposes. The Manor Park site was allocated in the Local Plan 2003 specifically for university purposes.</p>

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<ul style="list-style-type: none"> Surrey University own the land around Blackwell farm and wish to sell it for housing. Perhaps they may reconsider this strategy and preserve this area for the enjoyment of the residents of Guildford. 	
<p>University of Law</p> <ul style="list-style-type: none"> Significant demand from students who are seeking on-site student accommodation. The cost of housing in Guildford is high and short in supply. This deters students from enrolling at the University. The UOL's new student accommodation proposal will help to address some of this existing need and reduce the pressure for housing elsewhere in Guildford. This will meet existing need rather than any associated with a proposal for new academic floorspace. Policy 3 shouldn't only relate to new student accommodation associated with a proposal for new academic floorspace. It should encourage new student accommodation at the UOL whether or not new academic floorspace is provided. 	<p>The preferences of students attending the University of Law for on-site accommodation have been noted.</p> <p>The University of Law site is proposed to be inset from the Green Belt and the upper car park has been allocated for student accommodation (Policy A33). Key considerations include the setting of the Grade II listed building, conservation area and Area of Outstanding Natural Beauty.</p> <p>The text of Policy H1 has been amended to address the concern raised about the links between student accommodation and academic provision.</p>
<p>RHS Wisley</p> <ul style="list-style-type: none"> RHS Wisley accommodates the main education and research function of the Society and the School of Horticulture is based at RHS Wisley, which offers Diplomas in Horticulture and a Master of Horticulture. As part of its development, the Society is seeking to develop its educational activities further based upon its reputation for research as a centre of excellence for horticulture. Volunteers, interns and apprentices all benefit from the Society's work at Wisley. Paragraph 4.29 of the LPSSDLP lists further and higher educational institutions within the Borough of Guildford. As a provider of higher education, RHS Wisley should be recognised within the policy as a provider of higher education. We request that RHS Wisley should be listed in paragraph 4.29 to recognise it as one of the Borough's higher education institutions. At present there are 17 purpose-built student accommodation units located within Wisley Village with teaching and research facilities. The RHS accommodates other students, interns and apprentices in the village, so wish to invest in student accommodation to complement the expansion of higher education courses by providing an additional 17 units. As set out within the representations, dated 27 November 2013, the desire is to provide this additional accommodation within the Village in order to develop a mini student hub within close proximity to the practical experience offered to students in the Gardens. However, additional development is constrained by the TBHSPA and Green Belt policy, which will be addressed to enable this development to proceed. We have held discussions with Guildford Borough Council and Natural England to establish the principle of student accommodation within the Village or possibly within the Gardens as an alternative. 	<p>Amendments have been made and RHS Wisley School of Horticulture has been added to the policy reasoned justification (paragraph 4.2.16).</p>

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<p>Travellers</p> <ul style="list-style-type: none"> • People are looking for equality, consistency and fairness across the borough. • There is no evidence for a traveller transit site in the Borough, but this will be addressed if the need becomes apparent. <i>Effect of East/West Sussex transit Traveller site policy? A site will be needed somewhere in Surrey.</i> • Provision of traveller sites needs to be proportionate taking into account all the relevant constraints. • when travellers cease travelling they should not be treated differently from others who want or need social housing. • The Plan should include policies that prevent hard standing created for aximizi sites becoming a justification for future permanent housing development. • Retrospective planning permission on special grounds is prevalent. We believe a specific policy to rule against this behaviour is warranted. • inconsistencies of selection criteria on sites selected in the policy specified in this chapter. Will note inconsistencies on a site by site basis in comments. • Provision of traveller sites needs to be proportionate taking into account all the relevant constraints. • Where are all the traveller extra sites going to be sited in the whole Guildford Borough? • The draft Plan makes traveller sites conditional on safe vehicular access, turning space, parking, access to schools, health service facilities and other local services. When normal housing sites are considered, however, these requirements disappear: lack of infrastructure is not considered a constraint on housebuilding. This is a case of double standards • Travellers sites should be proportionate taking into account all relevant constraints • no support for Travellers pitches – I would much rather Guildford invested in affordable homes and appropriate infrastructure to support people with low income • Travellers usually prefer open settings where such are available. These are suitable due to the nature of their normal work, storage area, lorries etc . Also to the bias which often exists against them. Sites in suitable areas could be used by multiple families • art of traveller culture that the accommodation they occupy is on one floor, i.e. that of a mobile home. What is unfortunate is that this has the effect of doubling the amount of land that is needed in order to provide them with appropriate sites. The Parish Council therefore questions the need for space to be allocated for "related business activities" given the pressure on resources and the fact that this is a luxury most cannot afford • include policies that prevent hard standing created for traveller sites becoming a 	<p>The needs of travellers residing or resorting to our area have been assessed in the Guildford borough Traveller Accommodation Assessment. There was no need for a transit site identified within Guildford borough at that time.</p> <p>The total number of pitches and plots required over the period 2012 to 2027 is 73 pitches for travellers, and 8 plots for travelling showpeople.</p> <p>Planning policy for traveller sites August 2015 states that the Government's aims in respect of traveller sites include: for local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies to increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply to enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure for local planning authorities to have due regard to the protection of local amenity and local environment.</p> <p>Specific details of what we would expect to see on new traveller sites is set out within this policy as this policy replaces existing Local Plan 2003 policies H13 and H14 on Gypsy and Travelling Showpeople sites. Regulation 19 Local Plan policies including D1, D4 and P2, I1 and I3 do set out more overarching expectations for new developments.</p> <p>The location of traveller sites is addressed in greater detail in the section Planning for sites. Travelling showpeople traditionally have space within their plot to accommodate their business equipment.</p> <p>Creating hard standing is not a justification for permanent housing development, and adjacent neighbours are consulted when planning permissions are submitted.</p> <p>Many travellers have an aversion to living within bricks and mortar housing. Many travellers also wish to have a permanent place for their mobile homes/caravans.</p> <p>The day to day running of travellers sites is not within the remit of planning policy.</p> <p>Introducing a policy on retrospective planning applications is not within the scope of Local Plan making.</p>

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<p>justification for future permanent housing development.</p> <ul style="list-style-type: none"> • Consult with local residents before traveller sites are developed • the local plan the proposals for traveller sites appear to be woefully inadequate. This is a controversial issue that predates this local plan and deserves more sympathetic and proper consideration. • Need to have some places for travellers but normal houses should be provided for them (permanently). • Traveller sites should be run with a booking in system, proper facilities (paid for by the travellers) rubbish containers and perhaps a max stay of 28 days. Travellers do need somewhere to camp on route. Sites should be carefully chosen for accessibility for their large caravans which are not very manoeuvrable in tight spaces. • We need a policy to stop retrospective planning applications. It is widely abused. 	
<p>Traveller – numbers</p> <ul style="list-style-type: none"> • There seems to be more sites than are necessary • It is not clear that there is a requirement for four additional travellers caravan sites in the borough. • Do we need to provide so many? • the proposal between 2012-2027 to build over 70 sites for travellers and gypsies seems excessive and without grounds considering the reasoned extent of the well-established and integrated provision already present in the Guildford • Traveller accommodation should be proportionate to national need; by definition travellers move. While it would be clearly discriminatory to fail to provide a due proportion of those plots needed for travellers (especially those, per ministerial guidelines, that are genuinely travellers as opposed to actually part of the settled population) it is not clear that Guildford Borough should offer a higher proportion of accommodation than would be proportionate to the national traveller population. • Traveller accommodation should be proportionate to national need since, by definition, genuine travellers who are not part of the local settled population are mobile. It is not clear why Policy 3 proposes to offer more accommodation than this. 	<p>Planning policy for traveller sites August 2015 states that local planning authorities should make their own assessment of need for the purposes of planning.</p> <p>The needs of travellers residing or resorting to our area have been assessed in the Guildford borough Traveller Accommodation Assessment.</p> <p>The total number of pitches and plots required over the period 2012 to 2027 is 73 pitches for travellers, and 8 plots for travelling showpeople.</p>
<p>Travellers- support for policy and smaller sites</p> <ul style="list-style-type: none"> • Traveller pitches are vital. • I am pleased to note that you would plan to develop plots for travellers on a number of small sites. These small sites should be distributed on an equitable basis across the borough and not concentrated in just a few of the villages on the edges of the borough. • encourage smaller traveller sites which could be provided from within the travelling community by using land they own or would be easier to manage by 	<p>Within the reasoned justification for policy H1 we have stated our support for small scale Traveller sites as we believe these will better integrate with the locality (paragraph 4.2.20).</p> <p>Rather than focusing on the dispersal of development across the borough we have prioritised the most suitable sites. Our spatial strategy is based on sustainability</p>

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<p>local authorities.</p> <ul style="list-style-type: none"> • This is supported. It is refreshing to see Gypsy-Travellers included in a policy for housing generally and not a separate consideration at the end of the housing chapter. I support the reference to a need for a mixture of tenures-but in practice I see little evidence of this. I support reference to the need for small sites. Most allocations are for small sites. • In general we support the policy on this. In numerical terms this is not a large problem (though it is for the people suffering from inadequate housing) and it should be possible to meet it on normally developable land, or as a rural exception site. Consideration should be given to making the provision of pitches part of the affordable housing allocation. • I support the simple, uncomplicated and easily understood criteria which I am sure your colleagues in Development Management will be grateful for. • amended to encourage smaller traveller sites which could be provided from within the travelling community by using land they own or would be easier to manage by local authorities 	<p>considerations and our spatial hierarchy rather a proportionate growth approach.</p> <p>Brownfield land is at the top of our spatial hierarchy however there is insufficient land to meet our objectively assessed housing needs. Whilst seeking to make the best use of land it is important that we consider factors such as character when planning for development within our urban areas.</p>
<p>Traveller definition</p> <ul style="list-style-type: none"> • Dictionary defines a traveller as a person who travels or is travelling from one place to another, why are you providing sites? • Traveller sites are for non- travelling “travellers” and guidelines are about going to change in the near future. Guidance is now been amended to mean no special conditions apply and we believe this should be reflected in the Local Plan. These sites should all remain in the Green Belt and not be turned over due to political necessity, or because the last debacle was not managed or fought. http://www.localgov.co.uk/Councils-given-extra-power-to-tackle-unauthorised-traveller-sites/37203 • The section on travellers will need to be updated to take account of very recent Government pronouncements on the definition of travellers and the Traveller Accommodation Assessment will also need to be revisited in the light of the new definition of traveller which will exclude those who intend to settle permanently. • As The Local Plan will run from 2016-2031 it will now have to take into account the Department of Local Communities proposals that the definition of travellers in planning law will be changed so that local authorities would only be asked to plan ahead to meet the needs of those who lead a genuine travelling lifestyle. Applications for permanent sites by someone who has stopped physically travelling would be considered in the same way as an application for a bricks and mortar development on Green Belt. In Normandy we have two temporary sites that you are considering changing to permanent. The Local Plan will need to consider these changes in law. • In deciding whether to increase provision for travellers the question is why they 	<p>Planning policy for traveller sites (August 2015) defines gypsies and travellers for planning policy purposes as ‘Persons of a nomadic habit of life whatever their race or origin, including such persons...who have ceased to travel temporarily...’ It also gives advice on what to consider when establishing whether people are gypsies and travellers for the purpose of the Government planning policy.</p> <p>We have assessed the need for all types of accommodation within our borough and this includes the need for pitches and plots.</p>

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<p>need to be here. Travellers by definition should be footloose.</p> <ul style="list-style-type: none"> GBC should also not that census details show that 0.4% of the borough's population were classed as travellers, compared with 0.2% of the population of Surrey and 0.1% of the national population. GBC must not treat ex travellers as a privileged minority, and sites provided should go only to those who actually travel. Thus I object to this policy, as it treats ex-travellers and travellers the same, as a privileged minority. The traveller policy needs to take into account the latest government thinking and it needs to be proportionate and for true "Travellers" not permanent Travellers. This is not currently the case. emphasis must be on provision for those families who genuinely travel, otherwise each pitch on which someone settles permanently is immediately taken away from the travelling population 	
<p>Traveller site location</p> <ul style="list-style-type: none"> The large table at the front of the 'Planning for Sites' document identifies sites and their proposed uses in more detail. Numbers are indicated for those proposed solely as Gypsy, Traveller and Travelling Showpeople sites, however, where pitches/plots are proposed to be provided as part of a mixed use scheme numbers are not provided. It is therefore difficult to work out the total number of pitches/plots that are proposed. We recognise this is a difficult and challenging issue but consider that it will be necessary to specifically allocate sites for a specific number of pitches/plots to ensure they are deliverable and provide certainty. more evenly distributed within the Guildford area/borough, rather than the majority being situated close to the Wood Street Village object to the number of extra Traveller Pitches allocated to Worplesdon Parish and the inseting of Green Belt in order to create these Traveller pitches – Worplesdon, Normandy and Ash overburdened this west side of Guildford has more sites temporary residences on land which would otherwise be prevented from building on will be made permanent, to the financial benefit of those who built on it in the first place. Traveller sites should be spread over the whole County. It is no argument to say they want to be all together. We would all like to have our families together nearby. why does the Plan seek to inset land to allow for the Traveller Community in the same Parishes time and time again? why doesn't the plan seek to distribute the traveller community equally across all of GBC parishes. Surely this would allow for greater integration of the traveller community Traveller sites should be allocated to the periphery of existing developments 	<p>The site allocation policies allocate specific traveller sites, and these are listed at the beginning of the site allocation policies section of the Regulation 19 Local Plan. They are site numbers A48 to A57. The Land Availability Assessment (LAA) also now provides a breakdown of realistic sites for traveller development (Appendix A). Land needs to be suitable, available and achievable over the plan period.</p> <p>The LAA explains in Appendix A why we have looked to inset appropriate sites from the Green Belt to enable delivery of traveller accommodation, which includes the significant unmet need, the difficulty of providing traveller accommodation in urban areas and village settlements and the lack of availability on any public sites in Guildford or within wider Surrey.</p> <p>Rather than focusing on the dispersal of development across the borough we have prioritised the most suitable sites. Our spatial strategy is based on sustainability considerations and our spatial hierarchy rather a proportionate growth approach.</p> <p>Brownfield land is at the top of our spatial hierarchy however there is insufficient land to meet our objectively assessed housing needs. Whilst seeking to make the best use of land it is important that we consider factors such as character when planning for development within our urban areas.</p>

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<p>areas. By their nature the occupation should be considered transitory. Plots adjacent to existing residential caravan parks should be considered.</p>	
<p>Traveller sites in Green Belt</p> <ul style="list-style-type: none"> • Traveller sites (temporary or permanent) in the Green Belt are considered “inappropriate development”, except in very special circumstances and should not be considered to form part of a strategic site development located on the Green Belt. • The last minute inclusion of GBC’S vol VI which removes 9 traveller sites from the Green Belt is not acceptable. This is against the permanence of the Greenbelt and provides a loop hole by which the travelling community will be able to get benefit from in appropriate locations and developments. • The erection of 2 travellers pitches on Green belt is “positive discrimination” There would be no way a private individual would be allowed to build a house on Green Belt land so why should one portion of society be allowed to have a special preference over another? The use of travellers sites is also a very poor use of land and more families could be housed in the same floor area through more conventional housing • Cannot be sited in the green belt large swathes of green belt adjustment will need to be made. Provision of traveller sites needs to be proportionate taking into account all the relevant constraints. • Traveller sites have been specifically excluded from changing of Greenbelt sites by Government edict therefore this policy within the plan fails to follow planning statutes. • The NPPF Traveller Policy states that “Traveller sites are inappropriate development within the Green Belt unless very “special circumstances” have been identified.”In Nick Bowles Ministerial statement dated March 6th 2014 he reaffirmed Green Belt protection, noting that unmet housing need is unlikely to outweigh harm to the Green Belt to constitute very “special circumstances” justifying inappropriate development. • If we are not able to build on Green Belt land then the same rules should apply to Traveller sites. • The borough is required to provide sites through the plan-making process. However, Government policy is very clear that “Inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances”. Traveller sites (temporary or permanent) in the Green Belt are inappropriate development. • Guidance is clear that any boundary review to meet an identified need for a traveller site should be “an exceptional limited alteration” in “exceptional circumstances”, “to meet a specific identified need” and “specifically allocated in the development plan as a traveller site only”. 	<p>Paragraph 83 of the National Planning Policy Framework states that once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. This is the process we are currently going through, and we propose to inset sites from the Green Belt for various uses.</p> <p>Planning policy for traveller sites (August 2015) sets out Governments planning policy for traveller sites.</p> <p>Existing traveller pitches within the Green Belt are proposed to be inset from the Green Belt, as are the strategic development sites including those for housing.</p> <p>The need for accommodation for travellers is set out in the Travellers Accommodation Assessment. We know there is a backlog of need with overcrowded and concealed households.</p>

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<ul style="list-style-type: none"> • It is aximizing that the borough is required to provide sites through the plan-making process. However, Government policy is very clear that “Inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances”. Traveller sites (temporary or permanent) in the Green Belt are inappropriate development. This has recently been reinforced by the Planning Minister in a letter to Guildford’s MP in which he expresses concern that Inspectors have not always given the Green Belt “sufficient protection that was the policy intent of Ministers”. Guidance is also clear that any boundary review to meet an identified need for a aximizi site should be “an exceptional limited alteration” in “exceptional circumstances”, “to meet a specific identified need” and “specifically allocated in the development plan as a aximizi site only”. • Given this statement, there is no point considering any Green Belt sites as potential sites for travellers. And illegal settlements on Green Belt sites by “travellers” should receive exactly the same treatment given to others who build illegal buildings on the Green Belt. • Traveller sites (temporary or permanent) in the Green Belt are considered “inappropriate development”, except in very special circumstances and should not be considered to form part of a strategic site development located on the Green Belt. • It would appear that the borough wishes to provide more than its fair share of traveller sites and as these cannot be sited in the green belt large swathes of green belt adjustment will need to be made 	
<p>Traveller provision on strategic development sites</p> <ul style="list-style-type: none"> • object to traveller pitches being integrated into all new developments above 500 homes. This will make the proposal less viable to developers. Areas around the traveller pitches will inevitably be higher-density housing in order to meet the development cost brought about by the requirements for sustainability measures, contributions to upgrade poor or non-existent infrastructure and the 45% affordable units • objection to the requirement for Traveller provision to be made on strategic sites at the scale proposed, which compromises site deliverability through the loss of developable land. This objection may be overcome, should it be made clear that the most efficient use of land should also be made for Travellers site provision. The requirements may then be less onerous on development • The implied requirement for any large site of in excess of 500 homes to provide traveller sites is unenforceable on some sites due to environmental constraints. This eventuality is not covered in the policy. This is an omission • Mixing traveller accommodation with market housing development on strategic sites is impractical. The Plan should include policies that prevent hard standing created for traveller sites becoming a justification for future permanent housing 	<p>Paragraph 50 of the National Planning Policy Framework states that to create sustainable, inclusive and mixed communities local planning authorities should...plan for a mix of housing based on...the needs of different groups in the community.</p> <p>Integrating traveller pitches or plots within large development sites is considered to reflect the aims of national planning policy whilst helping to provide needed pitches and plots over the plan period.</p>

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development.	
Travellers Accommodation Assessment TAA <ul style="list-style-type: none"> You haven't explained what TAA 2012 is 	<p>TAA stands for Travellers Accommodation Assessment, and we have amended the text to refer to this in full.</p>
HMO's (and rented accommodation) <ul style="list-style-type: none"> Support HMOs Support the principle of this policy Houses of multiple occupation for students should be disallowed and the properties systematically returned to family and individual residences. much tighter and specific detailed rules to control HMO's should be introduced. Volumes and changes should be reported annually in the local plan report. The current wording is inadequate. rented housing –we trust the plan allows for the enforcement of high standards, affordable rents and longer tenancies There needs to be some positive intervention through the planning system to systematically reduce the numbers of HMOs in these areas. Para 4.36, which describes the policy on HMO, should be extended so that no undergraduate university students should be able to rent an HMO. concerned about those who are in private rented sector where housing costs take over 40% of their income (from their HNA) and hope the aspirations for more affordable homes can be achieved HMO issues are not confined to the Urban area of Guildford or just student accommodation, but are increasingly used by young professionals, as well as migrant workers. A report by John Perry "UK migrants and the private rented sector" Joseph Rowntree Foundation (2012) noted (ONS) 2011 census data, 75% of migrants who came to the UK in the past five years, reside within the private rented sector. I suggest that GBC is possibly unaware of the full extent of the number of HMOs across the borough because the council does not operate a licensing of small HMOs outside of the mandatory licensing requirement of the 2004 Housing Act. I further suggest GBC should seriously consider a licensing scheme to incorporate all HMOs to ensure that housing development in Guildford will be based on a better informed understanding of the needs and extent of the various groups of people living in the private rented sector across the borough. The problem of the concentration of HMOs must have a strong policy to avoid creating blight in an area. An increase in the number of homes may eventually decrease the need for HMOs but the current housing market would suggest that this will take time (and may never happen). The lack of long term, secure leases in the rental market make leasing properties a challenge for younger people who can't afford a mortgage. We need to address the stigma attached to long term 	<p>The Government sets out when the conversion of a building to a House in Multiple Occupation requires planning permission (The Town and County Planning Act Use Classes Order). Currently you do not need planning permission to convert a house into a HMO for less than six people.</p> <p>This policy sets out when we will support applications for HMO's (when they require planning permission) and what considerations will be taken into account. The reasoned justification expands upon this.</p> <p>The Council has set up an HMO Task and Finish group who have looked in detail at the issue of HMO's in the borough. This project included setting up an HMO stakeholders group and launching a Guildford Lettings Accreditation Scheme.</p> <p>The wording of this section has been amended slightly and we have added HMO's (where planning permission is required) to the monitoring indicators section.</p>

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<p>rentals and take a more European approach.</p> <ul style="list-style-type: none"> • Most HMOs cater for less than 6 people so the planning regulations do not currently apply. There is nothing to stop whole streets being overtaken by HMOs. Additional controls would be helpful. • HMO are not monitored properly in Guildford. York Road has rubbish dumped in the front gardens and sewage coming out from the flats. The park close by is populated by vagrants leaving litter. • a clear and unambiguous policy for Homes in Multiple Occupation ('HMOs') must be included in the Local Plan. The conversion of homes into HMOs has been envisaged but the management of existing HMOs has not. There must be a limit or some similar control on numbers (whether by reference to percentages of housing stock in any particular given area or by absolute numbers) and this must be capable of being managed through the planning system. • A clear and unambiguous policy for Homes in Multiple Occupation ('HMOs') must be included in the Local Plan. The conversion of homes into HMOs has been envisaged but the management of existing HMOs has not. There must be a limit or some similar control on numbers (whether by reference to percentages of housing stock in any particular given area or by absolute numbers) and this must be capable of being managed through the planning system. 	
<p>Disability</p> <ul style="list-style-type: none"> • No reference to the needs of disabled people, particularly accessibility. • Would prefer more recognition of access matters, and of sensory impaired people & people with learning difficulties. Access needs of disabled people should be taken into consideration. 	<p>Additional wording added to specialist accommodation section to read 'accommodation should be well designed to ensure it is adaptable and wheelchair friendly.' Building regulations will also help achieve this. People with learning difficulties have been added to paragraph 4.2.14 in the reasoned justification.</p>
<p>Self Build</p> <ul style="list-style-type: none"> • The draft plan has not taken into account the Governments' clear policy on custom build housing set out in the NPPF, its accompanying Planning Practice Guidance and the Housing Strategy for England. • The policy should encourage self build or serviced self build plots. This will be very good for low income families to get property which are very sustainable and eco friendly • Significant risk that the plan could be found unsound unless the Council makes an urgent assessment of local demand for people who want to build their own homes, to comply with Para. 159 of the NPPF and accompanying Guidance and take steps to meet any demand through its housing policies and proposals • The LPA are not in a position to only assess types of need they see as a priority. All types of need, including people who wish to build their own homes, should be evidenced and referenced in new Local Plans as per the requirements of the NPPF. It does not appear that Guildford Borough Council has done this and as such serious concerns remain over the representative nature of the draft 	<p>The policy has been reviewed in light of recent Government guidance and legislation and now includes a section on self-build and custom housebuilding (para 4.2.12). The Housing and Planning Bill is progressing through the House of Lords and has a section on self build and custom housebuilding which we will keep under review.</p> <p>The existing wording 'New development should provide a mix of housing tenures, types and sizes...' covers self build homes, and a new section on self build and custom housebuilding has been added to the reasoned justification.</p> <p>The SHMA 2015 has updated the section on self-build properties and the Council has since set up a Register for people with an interest in self-build or custom house building plots.</p> <p>Any site that is suitable for market housing is also suitable for self-build or custom</p>

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<p>document.</p> <ul style="list-style-type: none"> • Currently only option for self build is to demolish existing house and rebuild. • Teignbridge Local Plan 2013-2033 was adopted in 2014 and includes a policy for people wanting to build their own home after robust evidence gathering. Paragraph 4.22 states: <i>“In accordance with the National Planning Policy Framework the Council has collected evidence to understand demand for custom build. A leading land agent has provided figures indicating over 3,000 individual customers have paid subscriptions to search for residential plots in Teignbridge since 2001, indicating a high demand.”</i> 	<p>housebuilding as this type of housing falls within the same planning C3 use class category.</p> <p>Teinbridge example noted.</p>
<p>Self Build demand</p> <ul style="list-style-type: none"> • The robustness of the conclusions of the Housing Needs Assessment (HNA) 2013 which identified no demand from “people wishing to build their own home” is considered questionable. The relevant Housing Needs Assessment (Guildford 2013) contained one question which related to building your own home and is based on the answer of just 93 respondents. The Government are maximizing 107 the self-build market and the policy should maximize the contribution which can be made through this specialist type of housing. Given the nature of the product the level of self-build will be hard to quantify, however, the Council should put in place measures to allow for individual plots or larger development sites to come forward as self-build projects. • The methodology for collecting evidence on custom and self build is not robust and does not reflect the requirements set out in the NPPF. This has led to a potentially skewed evidence base which policy relies and derives from. • If a larger demand was evidence from a more robust data gathering exercise then the LPA would have been required to reflect this in the policies contained in the Local Plan: strategy and sites document. This could be included as a standalone policy to respond to individual plots of land and/or a requirement for a percentage of larger housing sites to set outside plots for self or custom build. • The methodology for assessing the demand of people who wish to build their own home appears flawed. Firstly, the number of respondents is not appropriate to measure a need such as this. This type of survey is not the most effective way of generating robust evidence on this subject. Secondly, the format of the question is rather confusing. Building your own home and living in a detached house for example are not mutually exclusive. Including the option of building your own home in this question is misconceived. It should be considered in as a separate question and not attached on the end with a list of options that do not relate properly • I do not believe that GBC could not find people wishing to build their own homes and would like to see the evidence to support this statement. • It is inconceivable that Guildford Borough has 0% demand for custom or self build 	<p>The SHMA 2015 looked in greater detail at the demand for self-build and custom build properties (pg 157).</p> <p>Following the enactment of The Self-Build and Custom Housebuilding Act 2015 in March 2015, and in accordance with The Self-build and Custom Housebuilding (Register) Regulations 2016 the Council has now set up a formal register for people or associations interested in a plot of land to construct a self-build and custom build house as a sole or main residence. We will be monitoring the level of interest and will have regard to the information on the register when carrying out our planning, housing, land-disposal and regeneration functions.</p> <p>The Regulation 19 Local Plan Strategy and Sites document now specifically allocates some self-build plots within the strategic development sites.</p> <p>The policy H1 has now been revised to include a section on self-build and custom housebuilding (para 4.2.12).</p>

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<p>from its population. If one in 50 people around the country (as surveyed by Ipsos MORI) expect to buy a building plot in the next 12 months for custom or self build purposes then this lack of interest in people from the Borough of Guildford is incomprehensible.</p> <ul style="list-style-type: none"> The 2013 Ipsos MORI survey questioned nearly 2,000 people and the results indicated that one in eight Britons expect to research how to build a home for themselves in the next 12 months. 	
<p>Self Build provision of plots</p> <ul style="list-style-type: none"> Councils should take a proactive position to providing land and should undertake rigorous and effective evidence gathering to measure custom and self build need in their districts. Require a proportion of the plots to be reserved / sold off for self build properties The housing proposals and site allocations do not consider self build 	<p>The Regulation 19 Local Plan Strategy and Sites document specifically allocates some self-build plots within the strategic development sites. However, it should be noted that any site that is suitable for market housing is also suitable for self-build or custom housebuilding as this type of housing falls within the same planning C3 use class category.</p>
<p>Viability</p> <ul style="list-style-type: none"> A clear indication of the level of information required to support a viability case should be embedded within this policy, or at least the supporting text. However, it is importance that the policy requirements comply with paragraph 122 of the CIL Regulations. The Guildford Society does not have a sense from the Local Plan as to how the Council will approach any viability test, nor the sequential approach to any concessions that might be made. If the Local Plan is to be predictable and defensible, there must be a clear hierarchy of need and a settled approach to determining the viability of any development in the context of CIL, Affordable Housing levies and in terms of other design and content provisions in this Local Plan when seen against the provisions of Policy 1 (Presumption in favour of Sustainable Development) The inclusion of this statement in the policy essentially means that all other policies in the Local Plan may be overridden if the Planning Department and Committee accept a non-viability case put forward by the applicant and his advisers. This is wrong and the Policy must be considerably strengthened to ensure that the appropriate safeguards and unbreakable links with other Local Plan policies are in place and enforceable. Viability is enshrined in the policy (see p32) as the final point: "We will consider on a case-by-case basis evidence of viability if an applicant can demonstrate that the requirements of this policy cannot be met." If this is included in the policy then it invalidates all other policies and so cannot be allowed to stand- it would become the only policy which had any effective force in the whole Local Plan, and would render the whole exercise meaningless. This is a get-out-of-jail-free card for developers. In practice viability will be used to both reduce the CIL and the affordable housing ratio, so that the people of Guildford will not benefit to the 	<p>The sentence on viability has been removed from the draft policy, as it repeats national planning policy (NPP F, paragraph 174) and guidance (PPG) without adding a local dimension to it.</p> <p>The viability issues that we will consider and the cascade approach to affordable housing contributions are set out in the draft Affordable Housing policy and its reasoned justification.</p> <p>Policy 11 addresses infrastructure and delivery, including viability (see paragraph 4.6.8 of the reasoned justification).</p> <p>We have removed the phrase "<i>subject to viability</i>" these affordable homes will be</p>

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<p>anticipated extent either in terms of additional affordable housing or in terms of CIL receipts</p> <ul style="list-style-type: none"> • NPPF paragraph 173 states: <i>“Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable”</i>. As Guildford is an area of high house prices, it would be very surprising if developers in this area ever failed to make “competitive returns”, which is supported by paragraph 4.53 of the draft Local Plan, where it states <i>“Our viability evidence shows that the vast majority of developments in most locations in the borough are viable with an affordable housing contribution of 40 per cent”</i>. Instead of virtually inviting developers to apply for waivers on the grounds of NPPF’s comment on viability, the Plan should instead be giving a very clear signal that applications by developers for viability waivers in this borough are expected to be very unusual indeed. Doing anything else displays a less than charming commercial naiveté. • It should be near impossible for developers not to make very substantial profits, and the way they dance rings around councils to eliminate the requirement for affordable housing. So GBC need to say no to developers who argue providing affordable homes as part of their development. If they can’t, then get someone else in to do the development who can. Change this policy to say that affordable housing is a fixed and non-negotiable part of planning permission. • Viability is a get out of jail free card for developers that will invalidate all other policy and should be removed. • Mix of housing should be agreed in advance. CIL should be agreed and money in the bank, before a tree is cut down or a blade of grass disturbed. This needs to be part of the developer financial cost. • This is too vague/ unenforceable and is open to abuse by developers who should not be protected by GBC if they overpaid for the land making the development uneconomic • This policy is not robust enough – developers are expert at arguing that they can’t make money if the council insists on all that affordable housing. The real need in Guildford is for affordable housing which is affordable to rent or buy to for shared ownership by people on middle and lower incomes in the borough. Without that developments are completely unacceptable. 	<p>provided.</p>

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<ul style="list-style-type: none"> • The wording of Policy 3 almost invites developers to apply for waivers from planning obligations, infrastructure provision, affordable housing provision, etc. The wording should robust to reflect your own evidence that the vast majority of developments can sustain a 40% mix of affordable housing and waivers should be granted only in exceptional circumstances. • Support for the realistic and flexible policy approach to viability which has potential to allow a wider range of development proposals to come forward and a case by case consideration • The sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened.’ (paragraph 173- NPPF) the provision of policy burdens such as an area’s affordable housing requirement (thresholds and percentage), may impact on the viability, especially when other environmental factors are taken into account on certain sites • This is too vague and is open to abuse by developers who should not be protected by GBC if they overpaid for the land making the development uneconomic. • Developers are expert at arguing that they can’t make money if the council insists on all that affordable housing. The real need in Guildford is for affordable housing and that means housing which is affordable to rent or buy to for shared ownership by people on middle and lower incomes in the borough. Without that developments are completely unacceptable • Viability’ should not be a get-out clause for developers: if they have not costed correctly, they should still have to provide the promised services. • “Viability” is not defined and looks like a “get out” clause for developers. • This policy is unenforceable and gives developers an opt-out on alleged viability waivers. Why should Guildford be providing homes for all? • Support the approach that is taken to viability, though a clearer indication of the level of information required to support a viability case should be provided in the supporting text of the policy. Officers need to be clearly aware of the implications. It should be made clear in the DLP that contributions toward this infrastructure, either by a physical provision or financial contributions are proportionate to the development proposed and are fairly and reasonably related to the development and the area in which it is located. Generally, any contributions sought from developments are only those that are needed and appropriate, as development should not be unnecessarily hindered but rather supported in a pragmatic and viable manner. In this regard contributions sought must be compliant with paragraph 122 of the Regulations, which states that a planning obligation must be (a) necessary to make the development acceptable in planning terms; (b) directly related to the development; and (c) fairly and 	<p style="text-align: center; font-size: 48px; opacity: 0.3; transform: rotate(-45deg);">Draft</p>

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<p>reasonably related in scale and kind to the development.</p>	
<p>Wording</p> <ul style="list-style-type: none"> • Policy 3 states: “<i>New residential development is required to deliver a wide choice of homes and meet a range of housing needs as set out in the latest Strategic Housing Market Assessment</i>”. In fact, the requirement is to meet a housing need target, not to meet the number in the SHMA unadjusted for constraints. It is first necessary to show that the SHMA is fit for purpose, that constraints have been applied etc. This has not been done. • The requirement is to meet the housing target, not to meet the Objectively Assessed Housing Need (OAN) number in the SHMA, and in any event it is necessary to demonstrate that the SHMA is fit for purpose - which, at present, it is not. • Assertions in point 4.17 should be subject to revision, since they depend on the 2014 draft SHMA which is deeply flawed and due for revision • it does not discuss density, and it is so loosely worded that is effectively meaningless. Until the housing number is corrected, it is not possible to break it down into categories. The requirement s to meet the housing target, not to meet the number in the SHMA as stated in this policy. In any event, the SHMA has been clearly demonstrated to be not fit for purpose. • The plan should run from the date of approval – housing need for past years is not relevant. • The policy should include wording which states that “All new homes require access to roads, healthcare provision, education and local community centres prior to being occupied” • Is too loosely worded to provide a clear and constraining framework for practical decision-making • Page 29 – Typing ERROR reads as 500 – 99 homes <i>should read as 500 to 999 homes</i>. • This is a "blanc mange" of a policy which on closer review appears to read more like a corporate mission statement than a serious policy statement. What on earth do you mean by houses that are "flexible, adaptable and age friendly" . That they have brackets pre-fitted for installation of a stair lift? • How is it proposed to assess what mix of type/house/size is "appropriate to the site". • Have specific mention in the Policy to the effect that 'the practice of developing new, free-standing residential property within existing gardens (so-called 'garden-grabbing') where such development would result in a materially higher plot density than that for the surrounding area, and where suitable frontage and 	<p>This policy is worded to focus on the range of housing needs (rather than the number) set out in the SHMA such as the number of bedrooms for affordable and market housing, tenure, specialist housing, care and residential home need etc.</p> <p>The housing number is established in policy S2. Please refer to the response to S2 and Appendic C on the evidence base for a more detailed response to the Objectively Assessed Housing Need (OAN) number in the SHMA</p> <p>Density is addressed in the policy text and supporting text.</p> <p>We are required to take into account the backlog of housing need and this is addressed in greater detail in the response to Appendix C - evidence base section on the SHMA.</p> <p>Policy I1 states that we will ensure that new infrastructure needed arising from a proposed development is provided and available when first needed to serve the occupants and users of the development.</p> <p>Typo noted and text updated.</p> <p>This is a strategic policy that seeks a flexible housing stock that can be adapted as the needs of the occupants change and paragraph 4.2.11 gives more detail such as level thresholds, wheel chair friendly and adaptable.</p> <p>Each site is assessed during the planning application process, and the most up to date SHMA will be used to calculate the right balance of housing sizes.</p> <p>More detailed housing and design policies will be in the Local Plan Delivering Development document. Paragraph 4.2.8 has been revised and does state that applications must have regard to the character of the surrounding area and plot sizes.</p> <p>When considering planning applications the impact of the proposal on local character, context and distinctiveness will be taken into account.</p> <p>Paragraph 4.17 has been updated to reflect the latest SHMA which covers Guildford, Woking and Waverley. Evidence base documents are not normally</p>

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<p>access onto adopted highways is not available, will be discouraged.</p> <ul style="list-style-type: none"> • What does “<i>re-ponding to local character, context and distinctiveness</i>” mean? Unless this is drafted to make it clearer and more prescriptive, the character of my village will be in the hands of developers aximiz on aximizing their commercial return unless the Local Plan defines far more tightly what is acceptable. • How is it proposed to assess what mix of type/house/size is “appropriate to the site”. This is not stated anywhere for reasons that are obvious ie to avoid cramping the developers who have options on the prime sites. • Some of the assertions included in point 4.17 should be subject to revision, given that they are reliant on the 2014 draft SHMA which, is, as further explored below, a deeply flawed document which is due for revision. The housing number is based on a Guildford only draft which is acknowledged to be flawed, and is superseded by a combined HMA draft covering Guildford, Woking and Waverley, which has not been subject to consultation and has not been seen by the public or even by councillors • What is needed is a very policy statement <u>for each settlement</u> that defines in clear prescriptive terms the standards that will be applied to developments (in terms maximum density, architectural style, height, size, etc, including different sets of such standards for different purposes. Eg. Full redevelopments of brownfield sites; conservation areas, infill developments, flood risk areas etc). Anything less will result in a fudge that fails to comply with NPPF, and will leave developers in a position where they can drive a coach and horses through ill-worded policies. If it’s not properly specified, it won’t happen! • Good design across all types of homes is essential, along with high ‘green’ credentials and BREAM ratings. • The Policy wording should be adapted to include reference to a minimum baseline density per hectare. • That development needs to respond to ‘local character, context and distinctiveness’ should afford us a degree of reassurance, but given the proposed numbers of new builds in areas of low density housing, with buildings of significant architectural interest, in close proximity to AONB and within existing Green Belt, we cannot see that GBC have taken any account of local character, context or distinctiveness. • statements in this policy are insufficiently precise • The drafting must be changed to plug all potential loopholes. • Is GBC seriously suggesting that new house building should continue until everyone who wants to live in the borough can do so? Totally unreasonable • headline wording which we find both unrealistic and misleading. It conflicts with 	<p>subject to consultation.</p> <p>We do not propose to have a minimum baseline density for this policy as the wording emphasises that density is dependent on local context and character. Paragraph 4.2.8 has been updated to state that planning applications will be assessed on a case by case basis having regard to the local context, character of area and sustainability of location. More detailed design policies will be provided in the Local Plan Delivering Development policy. The Residential Design Guide Supplementary Planning Document is likely to be updated .</p> <p>Without specifying the ‘loopholes’ it is difficult to ascertain whether the reviewed Local Plan has addressed them.</p> <p>The wording has been altered to reflect that this policy is about accommodation rather than housing numbers. The wording of the introductory text has also been updated.</p> <p>The approach towards density applies to all residential development, including traveller sites.</p> <p>Policy D1 requires all development to achieve high quality design. Policy D2 addresses sustainable design and construction.</p> <p>The housing target for the plan period of 2013 to 2033 is set out in Policy S2. The focus is on providing a range of accommodation rather than the specific quantity of housing.</p>

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<p>the Guildford Sustainability Appraisal which defines the objective as follows: “to provide sufficient housing of a suitable mix to take into account local housing need, affordability, deliverability, the needs of the economy and travel patterns”. The title of this policy is not helpful</p> <ul style="list-style-type: none"> • noted that paragraph 4.19 outlines the inclusion of C2 uses (residential intuitions) in the monitoring of housing delivery • policy wording should be amended to make clear that the ‘most efficient use of land’ should be made for Traveller sites. • Paragraph 4.21 , add the following text ‘There are opportunities created by large scale strategic development to create unique or new character, and hence facilitate appropriate densities’. • The policy states ‘new residential development is required to deliver a wide choice of homes and meet a range of housing needs as set out in the latest strategic housing market assessment’. In fact the requirement is to meet the housing need target not to meet the number in the SHMA unadjusted for constraints. As noted above the SHMA is defective and the consequences drawn from it in Policy 3 are consequently flawed. • “New housing developments must take account of local need to create balanced sustainable communities and give a genuine choice in housing.”The proposed 40% increase in housing for West Horsley is not balanced nor based on local need. • absence of a housing number, questions of how you break it down are pointless. This Policy is a sloppy piece of drafting that does not set out any clear boundaries to what planners can or can’t do. • In this there is the statement “the number of children under the age of 15 is expected to increase markedly to 2013.” Then under the heading Family Homes an expected increase of 3,300 is given. Statistics from the ONS (revised 2012 projections) show that in 2014 there is expected to be 24,400 children under 15 across the borough, and by 2031 this was projected by them to have increased to 27,400, an increase of 3,000, or an increase over 17 years of 12%. Thus to suggest the population of under 15 year olds will increase markedly was a gross exaggeration. Even this increase is entirely dependent on the birth rate continuing at the high level of the 5 years up to 2012, which is extremely unlikely. So this statement is not just an exaggeration, it was based on a projection that did not consider social trends, as GBC should have done. This is an illustration of the poor quality of analysis that features across many documents in the entire evidence base. • We suggest that this section of the Local Plan should include one or two paragraphs on GBC’s policy and ambitions towards the development of residential housing for commuters. 	<p>Comments noted and the sentence (4.2.9) has been revised to read ‘The number of children under 15 is projected to increase up to 2033’. This is based on the findings of the SHMA.</p> <p>Policy 3 looks at the mix of housing types; it is not appropriate to focus on who the occupants of the housing will be.</p>

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<p>Wording – typo’s</p> <ul style="list-style-type: none"> • Policy 3 Homes for All – First line of “Houses in Multiple Occupation”: transpose “only” to come before “where”. Insert “Where” after “and”. These suggestions may seem to be pedantic but they refer to a policy, not any old bit of text! • 4. 17 Policy 3 Homes for All – Correction to grammar needed in respect of line 7: “the number of children under 15 years old is...” Lines 9 & 11 “indicative need”: delete “indicative” as this is meaningless jargon. • 4.20 Density – line 5 needs a hyphen at the end. 4.22 Family Housing –line 4 needs a hyphen at the end. See also the lack of hyphens on page 34. 	<p>The policy wording has been updated and the text amended where appropriate such as the sentence (4.2.9) has been revised to read ‘The number of children under 15 is projected to increase up to 2033’ and the word ‘indicative’ has been deleted.</p>
<p>Wording – concentrations of development types</p> <ul style="list-style-type: none"> • It is unclear what is meant by “Concentrations of anyone type of accommodation in anyone place will be avoided.” Unclear statements or those designed to obscure meaning should also be avoided. This sentence is unclear, and its intentions are unclear, so it should be deleted. It is also undesirable. In the town centre, developers are likely to wish to build smaller units, which could well be socially desirable in terms of providing less expensive homes, so this is not only unclear, it is unhelpful as a policy. • Concern over wording ‘concentrations of one type of housing will be avoided’ – campus specifically for student accommodation and other types inappropriate 	<p>The wording of the policy has been reviewed and the sentence on concentrated types of development has been deleted.</p>
<p>Wording - expectation</p> <ul style="list-style-type: none"> • The policy is worded very badly and represents a wish list rather than a definitive policy: E.g.o We will expect a minimum...o They will be expected to make...o We will consider on a case by case basis evidence of viability. The policy needs to be reworded with a view to implementation I.e. We require... • the documentation refers to an expectation rather than a requirement. • In the paragraph on “Housing Mix”, the word “expect” is too weak. • Within the policy there is a proliferation of tentative language - e.g. "We will expect a minimum", "up to 30 per cent." etc. A policy must be clear and prescriptive or it cannot be implemented or be used to set planning decisions. All that these vague aspirations do is to assert a preference, which, given the viability clause, can be avoided in all circumstances by any developer. There must be a much stricter set of requirements enshrined within the plan that can become enforceable. • Replace ‘we will expect etc’ with ‘we require’ • The wording is very weak, “we expect” surely it should be a minimum requirement! • The policy needs to be reworded with a view to implementation I.e. We require... • draft Local Plan simply “expects” developers to meet the aspirations expressed 	<p>The wording of Policy H1 has been reviewed and amended. We have used stronger wording where appropriate.</p> <p>The first sentence states ‘New residential development is required...’ The same wording is used for the paragraph on density.</p> <p>The paragraph on viability has been deleted.</p> <p>The revised wording of policy H1 alongside the reasoned justification is considered to give a clear indication of how a decision maker should react to a development proposal.</p>

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<p>in this policy, then underachievement of those aspirations will inevitably occur because developers will be seeking to maximise their profits by developing to suit their objectives rather than those of the borough; therefore, the word “requires” should be used.</p> <ul style="list-style-type: none"> • The policy is worded incorrectly and represents a wish list rather than a definitive policy: E.g. We will <i>expect</i> a minimum..., They will be <i>expected</i> to make..., We will consider on a case by case basis evidence of viability • In summary, there is far too much woolliness for the existing wording to be described as a Policy. It reads as though it is intended to provide the widest possible flexibility for planners to make unfettered ad hoc decisions in the future. This Policy fails totally to comply with the requirement in paragraph 154 of NPPF that <i>“Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan”</i> the draft Local Plan simply “expects” developers to meet the aspirations expressed in this policy, then underachievement of those aspirations will inevitably occur to maximize their profits by developing to suit their objectives rather than those of the borough. The word “require” should be used. 	
<p>Infrastructure</p> <ul style="list-style-type: none"> • Local services are inadequate to service the homes proposed. The Main Sewer cannot cope with discharges in heavy rain and frequently bursts the manhole covers flooding gardens and farm land with raw sewerage and unmentionable detritus • The proposed high level of development would be unsustainable in terms of road capacity, public transport, drainage and schools • I don’t understand why the number of homes provided should exceed the capacity of the borough. Anything newly built need to have proper access to roads, schools etc • Is the Royal Surrey equipped to deal with an increase in the number of residents in the Guildford area? Areas such as the Maternity ward • Increase the number of houses in currently small places such as Normandy and Send – Please can you ensure that the plans will include schools and Doctors for the increased numbers of people that will move to this area. • Proposal is not based on local need and is contrary to the Council’s stated commitment in the plan to develop only where “the infrastructure is able to cope”. West Horsley has one shop, no post office and only a limited bus service. The size of the proposed expansion is ridiculous. • Affordable public transport to encourage social inclusion, thriving bus companies in rural areas to help alleviate living remotely with few facilities. Those on low incomes find moving around Guildford very expensive. Improve traffic 	<p>Planned development, both the strategic sites and the cumulative impact of smaller sites, will place extra pressure on existing infrastructure and will need new or improved infrastructure. The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure to needed support these sites.</p> <p>The IDP will be updated as further detail is available. Developer contributions (including the “pooled” Community Infrastructure Levy) and other funding sources will be used to ensure that key infrastructure is delivered to be available when it is needed.</p> <p>Infrastructure comments are addressed in greater detail under Policy I1 and Appendix B - Infrastructure Schedule. Surrey County Council are responsible for school buses.</p> <p>Infrastructure is addressed in Policy I1 with wording to ensure its provided when needed by the occupants of the new development.</p>

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<p>congestion during school terms with safe and affordable school buses</p> <ul style="list-style-type: none"> The policy should also state how the housing (residents) will be serviced by additional roads, healthcare, education, community centres etc., before the houses are occupied. The policy should include wording which states that “All new homes require access to roads, healthcare provision, education and local community centres prior to being occupied” 	
<p>Key workers</p> <ul style="list-style-type: none"> Recruitment of health and social care workers is hard in the local area. We would want to see good ‘key worker’ housing for this sector. There is a need for one and two bedroomed homes for the purposes of affordable housing to assist key workers in our important services and industries who cannot afford to live reasonably close to their place to their place of employment, in particular those who work in our hospitals, police and fire services .These individuals need to be close to their places of employment in order to give the flexibility in hours required by emergency services. Policy needs expansion and emphasis on the economic need for key worker housing for it is this sector upon which Guildford’s economic future depends. 	<p>The need for a good mix of tenures, sizes and types of houses is recognised to meet the needs of different people in our community. This policy aims to ensure that more 1, 2 and 3 bedroomed affordable and market houses are provided in residential development schemes, as justified by the findings of the SHMA. Sites have been allocated for housing development across the borough, including sites in close proximity to places of employment (such as the hospital).</p>
<p>Farming and forestry workers</p> <ul style="list-style-type: none"> Essential that developments including all agriculture buildings and structures, agriculturally tied buildings and any barn conversions are able to gain planning permission easily and without any additional costs. Overlooks the specific requirements of housing for farming and forestry workers –suggest an additional policy which encompasses the need for occupational accommodation for rural workers in the countryside, reference the functional and financial tests specified in PPS7, although superseded by NPPF, gives a sound and reasonable way to justify when and where rural workers accommodation is needed. Privately owned and managed accommodation to satisfy a specific local employment need, often providing accommodation for those with an existing connection to the local parish Agricultural developments should be exempt from payment of an affordable housing contribution, and the policy should be re-worded to reflect this. 	<p>All planning applications must be determined on their own benefits. We understand that recent changes to planning legislation enables the conversion of up to 3 agricultural buildings (outside of Areas of Outstanding Natural Beauty) to residential use.</p> <p>NPPF paragraph 55 addresses housing for rural workers and the re-use of redundant or disused buildings in the countryside.</p> <p>Agricultural development is not required to contribute to affordable housing provision</p>
<p>General</p> <ul style="list-style-type: none"> This policy is fluffy and unspecific I would strongly urge the council to re-consider this DLP to better in-keep with the values, spirit and soul of Guildford. It is a wonderful place to live and work, let’s please work hard to keep it as such Failure to resolve some of the major causes of relative deprivation needing 	<p>This policy aims to provide a strategic policy addressing the criteria set out in the NPPF and reflect the findings of our evidence base documents. The policy is based upon the ambitions of the National Planning Policy Framework to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities (para 49).</p>

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<p>remedy.</p> <ul style="list-style-type: none"> • This policy has some components that will challenge the planning department. • Concern over rental rates and the price of houses in the area, so appreciate the desperate need for more housing but feel it is important to get the development right for the sake of existing communities and the new communities you will be creating • the plan is ill conceived based upon flawed or unsubstantiated data/requirement and fails to address the significant infrastructure burden. • an example of a more sympathetic and successful development is the newly built village of Mawsley near Kettering. By building a new village in a suitable location a large number of houses were accommodated on sensibly sized plots whilst fully considering the needs of the residents by also building a school, Drs Surgery, Dentist, nursery, shops and community centre. This allows building targets to be met without excessive strain on existing services and infrastructure • Immigrants, the vast number being allowed into the country 	<p>It is hoped that the policies within the Local Plan will help address some issues of deprivation within the planning remit.</p> <p>Without further detail it is difficult to ascertain what the challenges to the planning department are considered to be by the respondent.</p> <p>Comments noted and it is the aim of the Local Plan to get good development schemes in the right locations.</p> <p>The SHMA has projected the housing numbers and calculated the need for size, type and tenure of housing over the period 2013 to 2033. Please see the evidence base and infrastructure section for further details.</p> <p>Example noted. The proposed strategic development sites provide a mixture of infrastructure, including schools and community uses.</p> <p>Immigration is addressed in the SHMA.</p>
<p>Affordable housing</p> <ul style="list-style-type: none"> • Identifying sites for building enough affordable homes – we are pleased that this problem is being addressed along with the attendant needs for infrastructure and dealing with traffic congestion • extra housing, particularly affordable housing must be found within existing towns and villages, using brown field sites and land trapped from agricultural or leisure use. Development must not be too dense that it spoils the relaxed aspect of these places. • Due to proximity of the Guildford Borough Council area to London, homes here will always sell and will not reduce prices or be 'affordable' • only way in which a greater measure of "equality" could be achieved is if the GBC start to build or finance affordable homes along the council house approach previously discarded • Since the building of council houses was discontinued, and the "right to buy" policy established, a significant percentage of the less well off population have very little chance of owning their own home • It may be desirable to have a for the world's wealthy elite. The primary goal for GBC is protect access to affordable homes for its own population and to confine its appetite for development to the constraints of the environment. GBC is required to honour its commitments to protect the borough's environmental assets for future generations. 	<p>Affordable housing is addressed in more detail in Policy H2. The Land Availability Assessment looks in detail at potential development sites including brownfield sites across the borough, and sites are allocated for development within the redrafted Regulation 19 Local Plan Strategy and Sites in the 'Site Allocation Policies' section.</p>
<p>Location of development</p> <ul style="list-style-type: none"> • With shopping moving to on-line purchasing and big business parks, there must be possibilities of using some of the old centre shopping space for 	<p>The town centre is the appropriate location for town centre uses that generate many trips, as it is generally the more accessible location by public transport (called the</p>

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<p>housing. Most of the suggested spots for development in this area represent small incursions into the Green Belt and must be resolutely resisted.</p> <ul style="list-style-type: none"> • Make development of brownfield sites for housing in the town the top priority, and a better understanding established that all land in the town of Guildford is so precious that it cannot be used for ground level parking. • We believe council should have policies to actively encourage the development of brown field sites 	<p>“town centre first” principle). Whilst housing is also needed in town centres, this should not be their primary use, housing can also be located away from public transport and areas for linked trips.</p> <p>The need for amendments to Green Belt boundaries is addressed in more detail in the response to comments on Policy S2 and planning for sites.</p> <p>Our spatial strategy is based on sustainability considerations and our spatial hierarchy rather a proportionate growth approach.</p> <p>Brownfield land is at the top of our spatial hierarchy however there is insufficient land to meet our objectively assessed housing needs. Whilst seeking to make the best use of land it is important that we consider factors such as character when planning for development within our urban areas.</p> <p>Whilst our spatial hierarchy prioritises sites in and around the urban areas as part of meeting our supply over the plan period, it is the smaller sites particularly around villages which are able to deliver homes in the early part of the plan period.</p>
<p>Deprivation</p> <ul style="list-style-type: none"> • The principle of the policy seems to be one of inclusivity. The failure to look to explicitly solve some of the major causes of relative deprivation is troubling. Impact assessment of proposed allocations on relative deprivation, as well as some positive policies designed to overcome some of the extreme deprivation scores. The Local Plan needs to make specific numerical reference to student homes and ensure we plan properly both for the students and their institutions, and also for current and aspiring residents and their communities. • Although data on a Lower Super Output Area basis is readily available, this does not seem to have been taken into account. The LSOA Deprivation Indices highlight specific challenges for particular areas in such topics as: Multiple Deprivation Index (overall Deprivation);Income; Employment; Health & Disability; Education Skills and Training; Barriers to housing and Services; Crime; Living Environment; 	<p>This policy focuses on housing to meet a variety of needs and this will help address one aspect of deprivation. It picks up on paragraph 50 of the NPPF to deliver a wide choice of homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities.</p> <p>Student housing is addressed in Policy H1 but also in detail within the SHMA.</p> <p>Lower super output areas are discussed within the Regulation 19 Local Plan in paragraph 2.6.</p>
<p>Extensions/ replacement of dwellings</p> <ul style="list-style-type: none"> • The Council should review Policy H9: Extensions to Dwellings in the Countryside of the Guildford Borough Local Plan 2003. The wording of Policy H9 on ‘small dwellings’ which aims to maintain a mix and balance of dwelling types and sizes to cater for a range of housing needs. housing and decent homes standards have changed since 2003 and we think the constraint in the policy is too restrictive and could cause hardship to small dwelling householders who wish to replace or add to the volume of houses 	<p>We plan to write more detailed policies in the Local Plan: Development Management Policies’ document. However, redrafted policy P2 now includes wording on extensions or alterations and replacement buildings in the Green Belt. It is not proposed to retain the small dwelling criteria in the Development Management Policies document.</p>

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<p>Number of homes</p> <ul style="list-style-type: none"> • Question number of homes proposed • Does not actually state the number of homes that are proposed, and so it is not possible to express a view on that number in terms of the proposed policy. • Policy 3 provides little by way of useful parameters for practical decision-making on planning issues. It does not state any dpa target figure, concealing the flaws of the SHMA report and GBC's true intention of promoting excessive housebuilding. • Unconvinced that the projections for numbers of houses required are valid, and as such the statements regarding types of housing are meaningless. 	<p>Policy S2 'Borough Wide Strategy' in the Regulation 19 Local Plan Strategy and Sites sets out the number of homes we will make provision for over the plan period.</p> <p>It is not considered necessary to repeat the target in this policy (now labelled H1).</p>
<p>Scale and character</p> <ul style="list-style-type: none"> • Take into account the impact of new build on Guildford's roof line and history so scale and character should be a critical determinant of building size particularly in the centre. 	<p>Policy H1 states that new residential development is required to...respond to local character, context and distinctiveness. Paragraph 4.2.8 in the reasoned justification now states that planning applications....will consider relationship with nearby buildings aswell as form, massing, height of existing buildings and structures and materials.</p>
<p>National Planning Policy Framework (NPPF)</p> <ul style="list-style-type: none"> • The NPPF sets three dimensions to sustainable development; economic, social and environmental. The third point has not been met, as this plan causes significant harm to the countryside. I object to the weight given to economic dimensions in this plan. As a result the plan cannot be considered to be promoting sustainable development. • Paragraph 150 of the NPPF advises that "Local Plans are the key to delivering sustainable development that reflects the vision and aspirations of local communities". In this respect, we have serious concerns regarding the effectiveness of the current public consultation exercise, given the level of uncertainty surrounding key aspects of the evidence base, in particular housing evidence, up to date employment evidence and information pertaining to the Duty to Cooperate which was previously requested by various parties at Issues and Options stage. Also have concerns regarding the accompanying SA and the manner in which it has been produced. • Paragraph 152 of the NPPF advises that where significant adverse impacts against any of the three dimensions of sustainable development are noted, these should be avoided and where possible, alternative options which reduce or eliminate the issues should be pursued. We do not consider that the Council has sufficiently considered alternative options. • The NPPF makes clear that Local Plans "must be prepared with the objective of contributing to the achievement of sustainable development" which is consistent with the principles and policies of the Framework (paragraph 151). NPPF, Section 39(2) of the Planning and Compulsory Purchase Act 2004 allows for local authorities to exercise plan making functions provided that they do so with 	<p>Policy S1 follows guidance from Communities and Local Government on sustainable development. Environmental considerations are addressed throughout the plan and the plan needs to be read as a whole.</p> <p>Comments noted and addressed in more detail in Policy H2 on affordable housing and Policy I1 on infrastructure and delivery.</p> <p>Comments noted and addressed in greater detail in the evidence base section and the Duty to Cooperate topic paper.</p> <p>Alternative options are considered in the Sustainability Appraisal.</p> <p>These comments are addressed in greater detail under the section on policy S2 and within the site allocations section.</p>

Issue	Guildford Borough Council Response
<p>the objective of contributing towards sustainable development.</p> <ul style="list-style-type: none"> The proposal to allocate the FWA site is contrary to the principles of sustainable development and is therefore also contrary to the basic principles to plan making. We do not consider the reasons for site selection have been justified through the SA and the plan. In light of the alternatives available we do not consider that the FWA site is the most appropriate for development or that the proposal can be justified in light of its location within the Green Belt. 	
<p>Consultation</p> <ul style="list-style-type: none"> Impressed with the wide ranging scope of the plan and appreciate the efforts that have gone into making everyone aware of it and to encourage everyone to give their views Support the widest possible involvement and comment to allow all views to be taken into account. Local involvement should extend beyond this consultation period and allow for continued involvement through to implementation of the proposals. We would be especially keen for the early engagement of the young in the development of strategic policies and the next local plan. Commitments to ensuring the continued support of accessible information, advice and support within Guildford is a welcome addition. This policy needs to be re-consulted after the SCMA document is released. 	<p>Comments noted and welcomed.</p> <p>Significant draft Local Plan consultation periods and events have been held. For full details please see the Community Engagement Statement Jan 2014 and the Statement of Community Engagement October 2014. Previous public consultations have specifically targeted and involved young people and their comments taken on board.</p> <p>The Council aims to provide accessible information, advice and support including the availability of relevant documents online, in our offices and in local libraries where appropriate.</p> <p>The Regulation 19 consultation will take place after the latest SHMA has been released.</p>

Comments on Policy 4: Affordable Homes

Issue	Guildford Borough Council Response
Support the principle of building more affordable homes	We acknowledge your support for more affordable housing to be built in the borough, for which there is great need
Confusion between need (local) and demand (proximity to London)	Need generally refers to affordable housing and demand is for market housing.
Would like to see greater commitment to affordable housing	We acknowledge that you would like to see higher affordable housing delivery
No explanation of which group in society affordable housing will apply to Should be more affordable housing for first time buyers, young families and older people wishing to downsize	Affordable homes are allocated to those on the Council's Housing Register, as being in need of affordable housing.
More affordable homes needed for first time buyer, young families, key worker rather than more "executive" homes	Agreed, this is where the greater need is
House prices driven by London market demand	Demand does come in part from outside of the borough, including from London. Demand is not the same as housing need, which is specifically for those whose

Issue	Guildford Borough Council Response
	housing need are not met by the market
<p>No evidence for this policy approach - Building a lot of market housing in the hope of getting a few affordable homes is a risky strategy</p> <p>High housebuilding numbers are cynically justified in the name of providing affordable homes, without any account taken of the supply-pull this would create from London.</p> <p>The borough needs affordable housing but building lots of housing will not mean these will be built. Building lots won't bring other prices down and there is no right for anyone to be able to afford the place or house type they want</p>	<p>Delivery of affordable housing as part of market developments is the government's current mechanism for delivering affordable housing.</p> <p>Additionally Councils can now build affordable homes themselves, but this is unlikely to result in anywhere near the number of affordable homes needed</p>
<p>Requiring investors to provide 40% of affordable pushes up the prices of market homes</p>	<p>When there is no government grant available to private developers, they need to take the cost to them of providing affordable housing into account in the price they pay for development land.</p>
<p>Building more affordable housing will not lead to lower house prices; just attracts more people to the area</p> <p>Building more homes will not reduce market prices because housing is a capital good influenced mainly by the price of capital rather than supply-and-demand mechanisms like consumer goods.</p> <p>Edge Analytics came to the same conclusion.</p> <p>Lots of other factors are ignored – ONS population data, windfalls, vacant properties, constraints on development etc.</p>	<p>These comments have been responded to in the table for Appendix C: Evidence Base</p>
<p>Calculation of affordable housing need is flawed, exaggerating need</p> <ul style="list-style-type: none"> • The backlog in affordable housing provision should not be included in calculating future needs. • Without a full council agreed housing number based on final complete SHMA, the evidence in draft LP is unsound • Evidence base is flawed, for split provision of affordable housing 70% for rent and rest by other means • Data on affordable housing need is not current • Where is the evidence to justify the additional homes being built (W. Horsley) • Population data is flawed 	<p>The SHMA has assessed affordable housing need using the Basic Needs Assessment Model, in accordance with the NPPG.</p>
<p>Calculation of affordable housing need is flawed and exaggerates need. This policy should be redrafted when the final SHMA is completed</p>	<p>The policy has been redrafted following the publication of the 2015 SHMA</p>
<p>Statement “half of Guildford’s residents cannot afford to buy or rent a home” is rubbish</p>	<p>Over the Plan period, the SHMA predicts that over half of future household demand will be from households that cannot meet their housing needs in market housing.</p>
<p>Affordable homes owned by GBC and under its financial control could be built using</p>	<p>The Council already builds its own affordable homes in the borough, with 65 new</p>

Issue	Guildford Borough Council Response
<p>council land</p> <p>GBC should build affordable homes on land it owns, so that it is in control, rather than rely on whether private developers are able to make sufficient profit from the building of accompanying market houses</p> <p>GBC should build affordable homes on its land rather than spending on commercial property investments as it has been.</p> <p>Within areas of borough, GBC more amenable to this style of housing</p>	<p>affordable homes built since 2012, and a further 12 on site and 18 more in pipeline. These are all within the Housing Revenue Account (HRA)</p> <p>The Council has also recently set up a Housing Company to build both affordable and housing on other sites.</p>
<p>Paragraph 4.46 should be part of Policy 4, rather than in commentary.</p> <p>“Developments that seek to avoid the requirements of this policy by failing to make most efficient use of land (having regard to Policy 3 Homes for All), or by artificially subdividing land into smaller sites will not be permitted”.</p> <p>The wording should be robust to reflect your own evidence that the vast majority of developments can sustain a 40% mix of affordable housing and waivers should be granted only in exceptional circumstances</p>	<p>We do not consider it necessary to include this wording in policy</p>
<p>Possible percentage rounding down will be applied to all new developments</p>	<p>The policy justification explains why we propose using mathematical rounding, which is considered to be most fair</p>
<p>Land may be unavailable due to assumption that it will become available for market value</p>	<p>Sites of qualifying size will have to provide affordable housing</p>
<p>Housing should remain affordable after the first occupancy in perpetuity rather than being sold into the market as they have been.</p> <p>Not clear the meaning of affordable housing and mechanisms to control prices of houses. People buy cheap houses and then they sell it higher price.</p>	<p>The NPPF definition of affordable housing, includes a requirement for all affordable housing to be retained in perpetuity, or for the subsidy to be recycled.</p> <p>Due to the government’s Right to Buy initiative, all we are able to do if it is sold is to make sure that any government subsidy (if there was one) is recycled</p> <p>Only rural exception housing is specifically exempt from the Right to Buy and Right to Acquire</p>
<p>Need flexibility regarding viability to prevent stalling of developments</p>	<p>Provision to consider this is set out in national planning policy and in the justification to this policy</p>
<p>Affordable housing should remain at 35%</p> <p>45% requirement could undermine viability</p> <p>40% target may be too high and may prevent many small sites being developed</p> <p>Object to provision of 40% affordable at a threshold 5 dwellings – unsupported by meaningful evidence/financial burden</p>	<p>Our development viability evidence shows that market housing developments can contribute more, and our housing needs evidence shows that affordability is an issue and the need for affordable housing remains high</p>

Issue	Guildford Borough Council Response
Should change wording from “at least 40%” to “up to 40%”	
GBC should explore ways to build a reasonable number of affordable houses within an overall housing target.	The 40% is the split between affordable (40%) homes and market homes (60%) on qualifying sites. These homes are all part of the overall housing number.
Council unable to achieve consistent 30% (affordable housing)	The Council have a good track record of securing affordable housing on qualifying sites
Support a single percentage target for all sites	Agreed. In the interest of simplicity of operation of the policy, we have amended the policy to include a single proportion of 40% as a requirement
Target for all sites should be 40%, subject to viability	
Object to requirement for 45% on rural sites of at least 5 units	This is viable and we have demonstrated need. However, in the interest of simplicity of operation of the policy, we have redrafted it to include a single proportion of 40% as a requirement.
How is the required affordable homes % of development arrived at?	The policy justification explains the need and viability evidence considered in drawing up this draft policy
Affordable housing target should be 80-90% of any new development	Our viability evidence shows that this would not be viable, the developments would not proceed and no housing would get built as a result
Support 45% on greenfield land, should be higher 50%	
If affordable housing proportions are set too high it will preclude valuable sites from coming forward	
Support lower requirement for brownfield sites reflecting generally higher development costs	In the interest of simplicity of operation of the policy, we have amended the policy to include a single proportion of 40% as a requirement.
Support the proposed lower threshold for affordable housing, and the proposed different percentages of affordable housing to be required on brownfield and greenfield sites	
Need for contributions from all housing developments, not just developments of five or more homes. Small developments can contribute to off-site provision.	Whilst very small site of four or less homes could contribute, we do not want to deter small developments, which may not realise sufficient profit to act as an incentive to the owner to release the land for development.
Why exempt developments of 5 homes from the obligation to provide affordable housing, levy on all new homes, and pool contributions from developments of 1-5 homes	Including a site size threshold will ensure that the unit site size threshold does not drive down housing density.
Further study is required to justify small development in very special circumstances for proven local need	
Site size threshold of 5 unit (gross) is too low and likely to impact medium sized house builders; suggest 10 unit threshold	Our viability evidence demonstrates that developments over five new homes are generally viable with 40% contribution
Specialist housing should contribute to affordable housing	Where suitable and viable, specialist housing will be required to contribute. Qualifying housing developments are set out in the reasoned justification to the policy.
Specialist housing (care homes / student halls) should not contribute to affordable housing	

Issue	Guildford Borough Council Response
<p>Threshold for contributing affordable housing should be higher, at 10 dwellings, and for schemes over this threshold there should be a scale for contributions, for example</p> <p>10 - 20 dwellings - 15%</p> <p>20 - 40 dwellings - 25%</p> <p>50 - 100 dwellings - 30%</p> <p>100+ dwellings - 35-40%</p>	<p>Our viability evidence does not support this approach. The borough would be missing out on many affordable homes from developments that could have provided them. This would not help to meet the borough's need for more affordable housing.</p>
<p>Use brownfield sites in the town centre for housing not commercial</p>	<p>Guildford town centre is the appropriate location for town centre uses that generate many trips, as it is generally the more accessible location by public transport (called the "town centre first" principle). Whilst housing is also needed in town centres, this should not be their primary use, housing can also be located away from public transport and areas for linked trips.</p>
<p>Rural exception sites can play a role in meeting local housing need</p>	<p>Comment noted.</p>
<p>Draft policy risks housing forced onto much less acceptable sites</p>	<p>The Council do not consider that the draft policy would result in housing coming forward on inappropriate sites.</p>
<p>Affordable homes for local people only in Shalford</p>	<p>Shalford has very little housing planned and so very little affordable housing will be developed. Rural Exception housing for local needs may be possible here where local need is demonstrated.</p>
<p>Housing register at parish level and not borough, allocate for local people</p>	<p>Parishes do undertake rural housing needs surveys. This type of house, allocated to those in housing need with a village or Parish connection is called rural exception housing.</p> <p>General affordable housing is allocated to those in greatest housing need.</p>
<p>More recent evidence on viability and need is required to support policy</p> <p>Support the principle of providing more affordable housing but no up to date proof of its viability</p> <p>Cost of land not a material consideration in determining viability</p>	<p>Both the "Local Plan Viability and Affordable Housing Study" and the "West Surrey SHMA" have been revised since the 2014 Local Plan consultation, and reissued in 2016 and 2015 respectively.</p> <p>Cost of land is a material consideration, as policy requirements should be taken into account in the cost paid.</p>
<p>Housing along river banks will not be affordable and will exacerbate the flooding issue</p>	<p>Housing development will be directed away from areas of flood risk and only approved in such areas where a sequential test and exceptions test are passed.</p>
<p>Affordable housing number must be secured in planning applications</p>	<p>These are almost always secured by planning obligation (a type of legal agreement), and occasionally by condition.</p>
<p>The Council should divide greenfield land into plots and sell them to families to develop their own homes, restrict to local families needing 3 plus bedroom houses</p> <p>The Local Plan should identify sites for self-build homes</p>	<p>Individuals and associations can apply to be placed on the Council's self-build and custom housebuilding register. The Council are required to keep such a register and have regard to it in our planning, regeneration, disposal and housing functions.</p>
<p>No information on density of individual areas for development</p>	<p>Density considerations are not set out in the design policies of the Proposed</p>

Issue	Guildford Borough Council Response
	Submission Local Plan: strategy and sites’.
Key worker housing provision should be either allocated to specific jobs or tied housing	There is no such category as key worker. Affordable housing is for those who cannot meet their housing needs in the market. Tied housing may be developed by particular organisations for their own staff.
<p>The policy will not lead to more affordable housing for those that need it because of clause “subject to viability”.</p> <p>This developer “get out” clause should be removed, as it encourages developers to avoid providing affordable housing</p>	This has been removed from the draft policy, as it repeats national planning policy (NPPF) and guidance (PPG) without adding a local dimension to it.
Requiring developers to provide affordable housing increases house prices	<p>There is a high demand and need for both market and affordable housing.</p> <p>Policy requirements such as affordable housing are taken into account in negotiating land sales.</p> <p>This is currently the government’s preferred method for affordable housing delivery.</p>
<p>All affordable housing built should be retained by a Housing Association. This would avoid them simply making money for the “buy to let” investment market</p> <p>I would like to see affordable housing protected from buy-to-let purchases who perpetuate high rents and low housing availability</p>	Currently, affordable housing must be provided by a Registered Provider, which is most unlikely to be a private “buy to let” investor
<p>Affordable homes should be in locations needed, close to jobs, community services and transport links</p> <p>Young people will move away because of house prices, which would be a loss to the community balance / sustainability of employment</p>	Whilst affordable housing is needed in the town centre, close to jobs, there is also a need for affordable housing in rural areas, close to rural jobs and families, in order to ensure our communities are balanced and mixed
More affordable housing would promote social cohesion, allowing people to live near their families and provide care	Comment noted. Affordable homes across the borough can help families to remain living close together, increasing social cohesion. This can also assist with care for the elderly or sick
<p>Affordable homes should be in keeping with rural character and community mix, and existing market homes</p> <p>Affordable homes should be on small sites, possibly such as Site 51, or mixed within a larger housing site, and not in large areas of only social housing</p>	Affordable homes are generally most suitably located mixed in with market housing in a single development. There should be not significant difference in design nor quality.
<p>Financial contribution will be difficult to use due to shortage of sites, and could delay main development. It should only be allowed as a very last resort</p> <p>Financial contributions in lieu of on-site provision should be possible, where on-site provision is not reasonable or viable</p>	The default position required by the National Planning Policy Framework and the ‘Proposed Submission Local Plan: strategy and sites’ policy is for provision to be on-site if suitable and possible. This is set out in the policy justification
Shared ownership is useful to assist key workers in accessing home ownership	A variety of affordable housing is needed to meet needs. This is likely to include some shared-ownership, starter homes, and homes for rent.

Issue	Guildford Borough Council Response
We need a wide range of house sizes and prices to address the needs of the market.	
Dearth of affordable homes for first time buyers, and any new development should target this sector of the market	The specific needs of first time buyers is being addressed by the proposals to introduce “starter homes” via the Housing and Planning Bill and its related changes to national planning policy and secondary legislation
<p>There appears to have been no viability assessment of the proposed development of the FWA site, particularly in terms of the provision of infrastructure such as the vehicle access and off site works, and exceptional costs that would arise from the provision of main services such as water, waste water, electricity, gas and broadband to serve a development of the size suggested in this location, rather than an extension to existing services in other locations closer to urban areas and main settlements.</p> <p>WPI submission on the Issues and Options consultation reference is made to viability issues in the potential provision of affordable housing (5.3). As such, in line with advice in the Planning Practice Guidance, if the cost of delivering the scheme suggested in draft policy 66 area are high, the Council cannot be certain that it would provide the suggested 40% affordable housing required to fulfil the social role in delivering sustainable development</p>	<p>Guildford Local Plan Viability and Affordable Housing Study 2014 does include consideration of the viability of this site (see Table 5.2). As not all infrastructure costs were known at that time, the Study acknowledges that a larger buffer is suitable, and caution should be exercised due to “currently unknown site specific Section106 costs”</p>
<ul style="list-style-type: none"> • No new student housing off-campus • Off campus, does this include land owned by UniS in town centre • Third parties put off from developing student accommodation in town centre • Allocate some town centre sites specifically for student housing 	<p>It would not be reasonable for all students to live on campus, which is generally more expensive than house-shares. There are also a number of other universities and colleges in Guildford whom do not have large enough campuses to accommodate students.</p> <p>The need for student housing is identified in the Strategic Market Housing Market Assessment (SMHA)</p>
<p>Homes and Community Agency– refurbishing and upgrading existing houses, first preferred option</p> <p>Developers to partner with Housing Associations on large housing sites to achieve real affordable and lively mixed development</p>	<p>We can use off-site contributions to upgrade existing market home and where suitable, convert them to affordable homes.</p>
<p>Introducing rent controls would lead to a withdrawal of significant buy-to let funds from the market, which cause prices to fall and increase the supply of affordable housing</p> <p>Rent checks to ascertain suitability for the area</p> <p>“Affordable Rent must be no more than the maximum percentage of market rent set out in our most recent housing guidance or strategy” It is proposed that this will only mean 80% of market rents. How this will enable those in genuine poverty to afford homes in Guildford, even "affordable" homes, is unclear</p>	<p>Whilst this would help to make homes more affordable, the government has said it will not introduce rent controls for the private sector.</p> <p>All affordable rented housing in the borough is in effect capped (it must be provided at Local Housing Allowance or lower)</p>
Scale of development proposed for West Horsley does not reflect in local need. The	This number is the need for affordable housing by existing households currently

Issue	Guildford Borough Council Response
West Horsley Housing Needs Survey May 2014 reports a need for 20 affordable homes	living in the area who cannot meet their housing needs in market housing. Over the course of the plan period, new households will form, and will move to work in the area and may need affordable housing.
<p>No housing in Guildford borough is truly affordable. This is especially so once council tax and rent increase are taken into account</p> <p>Ripley affordable homes are £379,000 object to GBC abdicating their duty to provide affordable homes</p> <p>Key workers' wages do not increase as rapidly</p> <p>The term "affordable housing" is not widely understood. Suggest using term "subsidised housing"</p>	The government's planning definition of affordable housing (set out in the NPPF's glossary) is the relevant definition for the Local Plan.
<p>Building flats and smaller homes that are more affordable but privately owned should be given greater consideration</p> <ul style="list-style-type: none"> • Tower blocks in centre of Guildford, young couples and family prefer to live in the centre of town, • Empty houses and businesses premises put into community use 	<p>Low cost market housing is currently specifically excluded from the government's planning definition of affordable housing (set out in the NPPF's glossary)</p> <p>The Council has an initiative to bring back into use long term empty homes.</p>
<p>Affordability is more of an issue for single people.</p> <p>Part of the affordability problem is connected to student loans and the debts that people have on leaving University</p>	These factors will certainly reduce the amount that a household can spend on rent / mortgage. However, the Council is not responsible for determining university tuition fees.
<p>No assessment has been made of any of the councils own housing estates many of which were built to very generous densities, or if it has it has not been made available as part of this consultation process.</p> <p>Most local authorities and housing associations have looked very closely at their older stock and introduced regeneration proposal that have seen significant net gains in numbers of units</p>	We do consider how we can make the best use of the land which we own to provide more affordable housing. This includes redeveloping underused garages
Affordable housing will encourage the building of fewer larger houses	Whilst intentional avoidance of thresholds can be an issue, we have addressed this in the policy, including new site size threshold by hectares, so developers will not have an incentive to build at a lower density.
Monitoring completion of new homes needed to see if affordable homes target is being met	We currently report the delivery of affordable homes annually in our Monitoring Report, and include suitable indicators in the 'Proposed Submission Local Plan: strategy and sites'
McCarthy and Stone has concerns over the wording of Policy 4: Affordable Homes (his policy applies to retirement homes, sheltered housing, Extra Care Housing, and all other types of housing that fall within Use Class C3) Assumption that Extra Care accommodation sits within Use Class C3 of the Use Classes Order.	This has been updated in the redrafted policy to reflect the need for supported living. This reflects the findings of Guildford's Local Plan and Affordable Housing Viability Study 2014 (updated 2016).

Issue	Guildford Borough Council Response
<p>Based on the case of development at The Clockhouse, London Road in 2013 (Application Ref: 13/P/01559), which was refused, we do note that the Council's officer report did accept that this development is within Use Class C2. It has therefore been established that Extra Care accommodation may sit within use class C2: Residential Institutions and as such the presumption in paragraph 4.43 that it is a C3: Residential use is therefore misleading and overly simplistic. We therefore respectfully request that the Council recommend amend the wording of Paragraph 4.43 so that it reads as follows: "...This policy applies to retirement homes, sheltered housing and all other types of housing that fall within Use Class C3, as well as student flats. It does not apply to residential institutions such as care homes, nursing homes and extra care accommodation which are within Use Class C2"</p>	
<p>We are concerned with the findings regarding affordable housing tenure and that the Draft Local Plan is suggesting that there is a need for a 90/10 split between social rented and intermediate equity based products. If this conclusion is carried through into policy it is very likely that many schemes will be rendered unviable and the Council will have to undergo a detailed viability process for every application.</p> <p>The lack of grant funding already hampers the delivery of affordable housing and increasing the pressure to largely provide social rented accommodation only will artificially prevent sites coming forward.</p> <p>We also question whether this conclusion is correct; as developers report that there is a very significant demand and need for shared-equity based products. They are very popular and are always quick to sell, demonstrating real demand and need as well as insufficient supply.</p>	<p>The proposed split of affordable housing tenure, based on identified needs (in the West Surrey Strategic Housing Market Assessment) is 70% rented and 30% other forms, including shared ownership.</p> <p>The draft Policy, alongside the 'Proposed Submission Local Plan: strategy and sites' as a whole, has been subject to viability testing in the Local Plan Viability and Affordable Housing Study 2014 (updated 2016), and shown to be viable.</p>
<p>Guildford Council had the opportunity to fulfil a definite need for affordable 1/2 bedroom homes for sale in the New Road development in Gomshall but chose not to do so in favour of taking a few more people off the Guildford town housing list by giving us all social housing, in direct contravention of their own existing local plan.</p> <p>The new development in New Road and Gravel Pits Lane in Gomshall has been allowed specifically to take people off the Guildford housing list as there is no proven need for social housing in Gomshall and Shere parish.</p> <p>We were also told that the council intended to charge rents at current private market rates for this new social housing so I fail to see how this helps families on low incomes. If they could afford private rents they would already be in private rented accommodation!</p>	<p>Every part of the borough has to contribute to meeting the housing need of the borough as a whole. The Council consider that affordable accommodation should be available in both urban and rural areas of the borough. People from Gomshall are entitled to apply for social housing in Guildford town, and vice versa. Applications are determined on need. The development at New Road was within the settlement boundary, so was not subject to 'rural exception' local / Parish connection rules, which are applied when affordable housing development is permitted in the Green Belt where residential development would not ordinarily be permitted.</p> <p>The development did not contravene the Local Plan. It followed the Local Plan, which stated that limited infilling within the settlement boundary in villages is acceptable.</p>

Issue	Guildford Borough Council Response
<p>We were promised a mix of housing - some social and some shared ownership or fully owned as affordable housing to buy such as 1/2 bedroom starter homes are needed by young people in the village but this is not what we have in this new development. It is specifically for the benefit of Guildford town.</p>	<p>The Council is not charging rents at market rates. The rents are set at Local Housing Allowance, which is roughly 70% of the market rate in Gomshall. This is a higher rent level than the original council properties in the area, and this is a function of a change in government policy which requires housing providers to fund the build of new affordable housing from the income from higher rents rather than from government capital grants.</p> <p>We considered shared ownership but felt at the time that rented housing was the greatest priority, particularly as shared ownership is related to market sale prices which were very high in Gomshall and might therefore have meant that shared ownership was out of reach of those who were eligible for the scheme.</p>

Comments on Policy 5: Rural Exception Homes

Issue	Guildford Borough Council Response
Support the policy	Comment noted
Do not support any development on greenfields, in green belt nor in rural areas	This is identified in the NPPF as suitable development on greenfield, green belt land
<p>Compliance with NPPF:</p> <ul style="list-style-type: none"> • This Policy falls foul of both Ministerial guidance and the NPPF by allowing development outside settlements even in Green Belt, and even suggests extending this to market housing. • This is a Trojan horse to allow development where it would otherwise be prohibited. • The Policy in the blue box needs to make it clear that the overriding requirements of the NPPF, especially NPPF 87, 88 and 89, fully apply 	<p>Allowing Rural Exception Housing in the Green Belt is compliant with national government policy.</p>
Commendable that the Council has worded the policy to include sites which adjoin or closely relate to an existing settlement; either defined or non-defined.	The suggested wording is to enable greater opportunities for rural exception housing than the current Local Plan 2003 policy whilst being suitably located
<p>Viability:</p> <ul style="list-style-type: none"> • Object to the commentary that allows developers to avoid the policy altogether if they deem it non-viable. Rural exception sites should not be used for market housing. • There are no circumstances where it should be permissible to build market housing under the rural exceptions scheme • This policy is contrary to the policies given within the NPPF. Planning 	<p>The NPPF's glossary definition of affordable housing tells us we may allow small numbers of market housing at our discretion where this would help with viability</p> <p>Viability of rural exception housing is a valid consideration</p>

Issue	Guildford Borough Council Response
<p>permission cannot be given for market housing in the green belt.</p> <ul style="list-style-type: none"> • The “viability” get out clause at paragraphs 4.66 and 4.67 should therefore be deleted • Paragraph 4.66 (inclusion of some market housing if needed to deliver rural exception housing) is unlikely to be observed • Object to exceptions, create loop holes, the original reason will be forgotten and taken advantage of. 	
<p>Is there actually any legal mechanism to enforce this, will developer not just go through the back door and purchase land as agricultural land for a huge price and then ask to develop it.</p> <p>Inclusion of market housing will increase the price of the land and thus negate purpose.</p> <p>Money can be raised through alternative mechanisms and self build programs.</p> <p>'ten times the agricultural land value at the time' in 4.67 is far too high and would encourage land banking and possible neglect of agricultural land.</p>	<p>Inclusion of any market homes would be at our discretion, as set out in national policy. Whilst we may consider allowing these where vital to deliver a scheme, this will be the exception, in order to comply with national policy.</p> <p>From experience of rural exception housing, we have calculated this as a reasonable multiple.</p>
<p>The explanatory notes on rural exception housing at 4.66 and 4.67 states that enabling market housing may be allowed. This has not taken para. 89 of the NPPF into account which states that exceptions to Green Belt policy are limited to affordable housing.</p>	<p>This reflects NPPF paragraph 89 “limited affordable housing for local community needs under policies set out in the Local Plan. Such housing is also referred to as “rural exception sites”, which, as set out at paragraph 54 and in the glossary “Rural exception sites”. Our Local Plan policies must be consistent with national policy, and we must therefore be willing to consider, at our discretion, market homes where needed for viability</p>
<p>Whilst we support Policy 5 in principle, given the findings of the Sustainability Appraisal, there is a need for a more flexible approach to facilitate the provision of affordable housing on rural exception sites where there is a lack of public subsidy.</p> <p>Policy 5 should therefore be amended, in accordance with paragraph 4.66 to allow for more market housing to act as ‘enabling development’ on such sites where it will deliver affordable housing for the local population if there is a known need.</p>	<p>The chosen policy approach reflects both options in the 2014 Interim SA report. Potential for provision of some market housing is included in the policy justification.</p>
<p>Traveller sites are not appropriate in the green belt, and rural exception sites are therefore not appropriate for travellers</p>	<p>The NPPF says, “To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community” (page 13). The ‘Proposed Submission Local Plan: strategy and sites’ proposes to amend Green Belt boundaries to meet the need for housing (C3), employment land, and traveller accommodation.</p>

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	Policy D of Planning Policy for Traveller Sites (national planning policy) is called rural exception sites, and promotes use of rural exception policy for Traveller sites, in line with rural exception for bricks and mortar housing, to help meet local needs.
Support traveller pitches in this policy	Comment noted.
We understand the thinking behind this proposal and welcome in particular the statement made in paragraph 4.63. We believe that the Parish Councils must have input and involvement in connection with Local Needs Surveys	We welcome working with local communities to help to deliver affordable housing to meet local needs
The cascade provision implies that such housing may be built without a demonstrated need in the parish. For locals only	Approval for a scheme will not be given for a rural exception scheme unless there is proven need for this type of housing in the Parish. Between carrying out the local needs survey and completing the housing, local needs may have changed, but this is a last resort for rural exception housing, which almost all gets allocated to those with a Parish connection.
We do not find the wording of Policy 5 sufficiently concise. It is too open to interpretation, and insufficiently precise.	Care has been taken to ensure wording is sufficiently clear and precise.
It would be more robust strategy to specifically allocate all of the suitable sites within or immediately adjoining the defined village settlement boundaries in order to directly contribute to the Council's housing target. However if Policy 5 is kept para 4.66 should be amended to allow for more market housing to act as 'enabling development' on sites where it will deliver affordable housing for the local population if there is a known need. Also public subsidy should be made explicit in the policy.	We did consider allocating land for rural exception housing, but this was not the preferred approach as it could well lead to land banking in the hope of a higher value land allocation or permission.
These policies could produce different type of policy outcomes for public sector/ affordable homes and private housing sector residents, with a more discretionary policy working for public sector/ affordable homes which would appear to be at risk of producing unfairness between owners.	Rural exception housing is specifically for those who cannot afford to access market housing.
No mention of alternative rural housing delivery models in the plan such as Community Right to Build / Community Land Trusts; these should be included here	These do not currently meet the government's definition of Affordable Housing providers in the NPPF, except for intermediate housing for sale, which Community Land Trusts are unlikely to deliver. The definition of affordable housing is likely to change soon, which will change who can deliver affordable housing.
Surely paragraph 4.62 <i>"We will facilitate provision of rural exception sites and small sites in the Green Belt for local traveller needs where such a need is demonstrated"</i> is contrary to Policy E in the NPPF Planning Policy for Travellers document. It states traveller sites are inappropriate development in the Green Belt, except in very special circumstances. What are the very special circumstances here?	The proposal to enable rural exception sites for Traveller accommodation conforms with national planning policy – Planning Policy for Traveller Sites Policy D Rural Exception Sites. Rural exception sites can be provided for traveller accommodation in the same way they are for bricks and mortar housing. We consider that there are exceptional circumstances that justify amending Green Belt boundaries. In the case of traveller accommodation, this will create small insets

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	from the Green Belt. The 'Proposed Submission Local Plan: strategy and sites' will include a series of topic papers to help readers understand the exceptional circumstances.
Oppose traveller sites being imposed on rural communities which are not occupied by the persons listed as permitted occupants, as has happened in the past. Do not have good reputation of environmental protection	Rural exception traveller sites would be required to meet a local need, therefore the residents of the new accommodation would have a local connection, in accordance with Policy D Rural Exception Sites of Planning Policy for Traveller Sites (national planning policy), which says, "Rural exception sites should only be used for affordable traveller sites in perpetuity. A rural exception site policy should seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection, whilst also ensuring that rural areas continue to develop as sustainable, mixed, inclusive communities." The conditions of planning permissions (including temporary permissions) are subject to enforcement where appropriate.
The selection of land for traveller sites should take account of the fact that many residential pitches need to have space for appropriate business activities in their proximity	Planning Policy for Traveller Sites says, "Local planning authorities should consider, wherever possible, including traveller sites suitable for mixed residential and business uses, having regard to the safety and amenity of the occupants and neighbouring residents." Where appropriate, business use has been included in site allocations, however, the majority of sites are solely residential. This is due to the location of the sites in residential areas, the landowner preference (in relation to small private sites) and the need to make the most efficient use of the land.
Normandy has taken a lot of traveller sites over last 15 years, other areas have to take their fair share	The identified need is proposed to be met through a combination of direct provision by the Council, developer provision from sites over 500 homes, and some temporary permissions becoming permanent. This achieves a distribution across the borough.
A clear need within Effingham for some rural exception homes for Travellers with strong local connections. Should be used instead of inseting village from green belt.	The 'Proposed Submission Local Plan: strategy and sites' allocates six new Traveller pitches at Home Farm in Effingham, to be delivered as rural exception pitches, and not inset from the Green Belt.
Policy 5 should be more flexible to accommodate 'enabling development' and alternative models of housing delivery, such as 'community right to build' and 'community land trusts'	

Comments Policy 6: Making better places

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Evidence of Burpham shows no intention of making it a better place in the past few years	This policy is one of a number of policies that will be used to ensure a high standard of design in all new development.
Design Panel: <ul style="list-style-type: none"> • Should have a Design Review Panel • Should not set up a Design Panel 	The NPPF recommends the use of design review panels. A Design Review Panel was therefore set up in 2015.
Merrow could actually become a worse place	This policy is one of a number of policies that will be used to ensure a high standard of design in all new development.
Historic buildings recently knocked down	Demolition of a heritage asset is a rare occurrence and will only be permitted under exceptional circumstances if criteria in local and national policy have been fulfilled.
Must protect heritage	Policy D3 of the 'Proposed Submission Local Plan: strategy and sites' relates to the historic environment. The policy will be used to ensure that the boroughs heritage assets are conserved and enhanced.
Planning permission should only be given to places with architectural merit and once a traffic impact assessment has been carried out	Development proposals will be assessed against all policies in the plan including the specific transport policies.
HGVs should be removed from town centre and towards industrial sites	Comment not relevant to this policy.
Words in policy won't be met with actions	Once the Local Plan is adopted it will become part of the Council's Development Plan. Planning applications will be assessed against the policies of the Development Plan and permission for development will only be granted if proposals fulfil the criteria of the relevant policies.
Policy is unenforceable	Once the plan is adopted development proposals will be assessed against all of the policies in the plan and will be refused if they do not meet the criteria.
Good to give priority to non-car based transport	The policy recognises the need for new developments to give priority to non-car based modes of transport.
Use "require" rather than "expect"	Noted, the opening line of the policy now reads "We will require all new development, ..."
What kind of public space can be built on 0.5ha	0.5hectares is the minimum size of site for which this policy will apply, the policy requires developments to "provide places for communities to meet and interact, such as play and recreation and other public spaces in large development." This requirement could be in met in different ways, the size of the site will play a role in how this is achieved but the policy will apply to all sites over 20 dwellings or on sites of over 0.5 hectares.
More emphasis on the context of new developments	Agree, the policy has been re-drafted to say that all developments will "respond meaningfully and sensitively to the site, its characteristics and constraints, and the layout, grain massing and height of surrounding buildings."
No commitment to design quality to ensure attractive design	The draft policy sets the standards that will be required to ensure design quality in the borough.
Landscape Character Assessment should be observed more closely	The Landscape Character Assessment is Key Evidence for policy D4 'Development

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	in urban areas and inset villages.
No mention of controlling street clutter or pollution	Policy D2 of the Proposed Submission Local Plan covers sustainable design and construction.
Policy should apply to all developments	This is one of a number of design policies that development proposals should conform with.
Wisley is only accessible by car yet this policy wants to encourage non-car based	The policy will be applied, along with others in the plan, to all new developments.
Take advantage of renewable energy technologies	This policy will be used in conjunction with others in the plan that cover sustainable energy sources
Definition of large developments needs to be revised upwards (100+ and a medium of 20-40)	As a general principle the 'Proposed Submission Local Plan: strategy and sites' allocates sites that are over 25 homes. These are considered to be key to the delivery of our strategy and we still consider it appropriate that these sites are delivered with regard to the criteria set.
Small dwelling definition should be referred as one that which typically has 4 or fewer bedrooms	This policy is specifically aimed at site of 20 or more dwellings or over 0.5 hectares.
Housing and infrastructure: <ul style="list-style-type: none"> • Building new homes is not the only way to meet unmet housing need • Make better use of existing buildings • Improve infrastructure 	Comments not directly relevant to this policy. Policy D1 (formerly known as policy 6) is specifically aimed at developments of 20 or more dwellings or sites with an area over 0.5 hectares.
Precision of areas to be improved	This is a strategic policy and the site allocations document contains all of the sites that we expect to come forward over the life of this plan.
Some areas could be made better use of- houses on work hours used car parks (40 hours/week)	This is outside the scope of the policy.
Improve transport networks and road safety	The 'Proposed Submission Local Plan: strategy and sites' addresses transport issues through: <ul style="list-style-type: none"> • Policy I3 Sustainable transport for new developments • Appendix C Infrastructure Schedule which sets out the transport schemes that are considered necessary for the delivery of the draft Local Plan.
Keep verges cut back and neat	This is outside the scope of the policy, the local plan will not have an impact on existing maintenance regimes.
Regular litter collection and litter education	This is outside the scope of this policy, there will be no impact on existing litter collection arrangements from this policy.
If 89% of Parish Forum Survey could see no benefit, is plan really going to make places better	The policy will be applied to all new developments of 20 or more dwellings or 0.5 hectares or more in size.
Support	Comment noted
Cannot work with current proposals for sites in flood plains	The 'Proposed Submission Local Plan: strategy and sites' is supported by evidence base relating to flood risk, including the Guildford surface water management plan, the SFRA (level 1 and 2) and the flood risk sequential test. Further detailed consideration to flood risk would be taken during the determination of a planning application. The NPPF states that, "When determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere". Policy P4

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	of the 'Proposed Submission Local Plan: strategy and sites' also sets out the Council's approach to ensuring that development is safe from flooding and appropriately located.
<p>This plan will lead to:</p> <ul style="list-style-type: none"> Loss of visual amenity Loss of recreational amenity Loss of agricultural land Negative impact of wildlife Destruction of the Green Belt Pressure on all services 	Any proposals will need to demonstrate at planning application stage that they are of high quality design and in keeping with the character of the surrounding area. There are a number of policies in the 'Proposed Submission Local Plan: strategy and sites' that will be used to assess this.
The scale, form, siting, materials and landscaping are appropriate to their setting and take into account the context in which they are sited.	This policy has been amended to require all new development to "respond meaningfully and sensitively to the site, its characteristics and constraints, and the layout, grain, massing and height of surrounding buildings."
Should have an equivalent of the Lightbox in Woking	This policy is aimed at developments of 20 or more dwellings or development proposals on sites 0.5 hectares or more in size.
No proven track record in Guildford for design	This policy will help us to encourage applicants to come forward with high quality new schemes.
Is it good to mix residential and commercial?	National guidance suggests that mixed used schemes should be encouraged where appropriate. Policy D1 asks for an integrated mix of uses that fosters a sense of community and contributes to the creation of inclusive communities.
Density of housing proposed is too high	The policy is not proposing density standards, all development will be required to respond to its context.
<p>Cycle routes:</p> <ul style="list-style-type: none"> • Provision of bike paths and walking routes is essential • Existing cycle lanes cannot be made better without changing the character of the area • Unrealistic to use just bikes as a form on non-fuel based transport • Too many cyclists - should cut down on cycle lanes so there are fewer opportunities 	<p>The policy has been revised to ensure that cycle and pedestrian routes are designed into new developments. The policy also ensures that developments will take into account the characteristics and constraints of each individual site.</p> <p>The 'Proposed Submission Local Plan: strategy and sites' also addresses transport issues through:</p> <ul style="list-style-type: none"> • Policy I3 Sustainable transport for new developments • Appendix C Infrastructure Schedule which sets out the transport schemes that are considered necessary for the delivery of the draft Local Plan. <p>Schemes AM2, AM4 and AM5, as included in the Appendix C Infrastructure Schedule, will realise the comprehensive Guildford borough cycle network programme of cycle improvements, including off site cycle networks from both the Land at former Wisley airfield site and the Land to the south of Normandy and to north of Flexford site to key destinations.</p> <p>As planning applications are considered for the sites identified in the new Local Plan, additional transport schemes to address site access and other localised</p>

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	<p>issues may be secured.</p> <p>The National Planning Policy Framework states that “The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel. However, the Government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas.” (paragraph 29).</p>
Should not use planning policies as a form of social engineering to limit parking	Policy I3 Sustainable transport for new developments in the ‘Proposed Submission Local Plan: strategy and sites’ states that: “We will expect new development to: ... provide off-street vehicle parking for both residential and non-residential developments at a level which prevents overspill parking on the public highway where there is a clear and compelling justification that it is necessary to manage the Local Road Network [and] within or adjacent to Controlled Parking Zones A, B, C and D where there is existing on-street parking stress, planning permission for residential developments will be subject to a planning obligation to require that future occupants will not be eligible for on-street residents parking permits”
Development should be in towns not countryside	The spatial hierarchy in the ‘Proposed Submission Local Plan: strategy and sites’ sets out the preference for the location of development. The priority for development is within the town and urban areas, but this is unable to accommodate all of the development needs.
Water/ sewage not mentioned	Thames Water will work the planned housing into their investment programme only once a site has planning permission. Any planning application for development of the site would therefore need to be conditional on upgrades to the water supply system being implemented, with the developer paying a contribution where needed.
Broadband not mentioned	Broadband is outside the scope of the policy.
Need schools at all levels	We are working with the Local Education Authority, Surrey County Council, to identify schools that can be expanded to meet future needs at all levels. One of the strategic sites allocated in the local plan, new primary and secondary schools are proposed.
Health - all levels, need expansion	We are working with the CCG to ensure that GPs surgeries can expand to meet future needs, and where sizeable new developments are proposed, new primary and secondary schools are proposed. Details of planned expansions and new schools are set out in the Infrastructure Schedule appended to the draft new Local Plan.
Any plans for new cultural facilities	The policy requires a mix of uses and asks that large scale developments provide places for communities to meet and interact.
Town Centre - building should be of scale and character, and flat roofs and TV aerials should be reduced.	New development will be required to respond to the individual sites characteristics and constraints which will include the existing scale.
Roads also are not suitable for buses, so people are forced to use cars	Comment noted.

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	<p>The National Planning Policy Framework states that “The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel. However, the Government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas.” (paragraph 29).</p>
Remove phrase that people are of different types	This phrase has been removed and the supporting text re-worded.
Need a joined up Local Transport Policy	<p>The ‘Proposed Submission Local Plan: strategy and sites’ also addresses transport issues through:</p> <ul style="list-style-type: none"> • Policy I2 Supporting the Department for Transport’s “Road Investment Strategy” • Policy I3 Sustainable transport for new developments • Appendix C Infrastructure Schedule which sets out the transport schemes that are considered necessary for the delivery of the draft Local Plan. <p>In addition, the Guildford Borough Transport Strategy (Guildford Borough Council, April 2016) an up-to-date and forward-looking strategy which proposes a programme of schemes covering all modes of surface transport in the borough. The transport strategy is consistent with the ‘Proposed Submission Local Plan: strategy and sites’ with the transport schemes on which we consider the delivery of planned growth will depend written into the Appendix C Infrastructure Schedule. The transport strategy will inform the preparation and review of Surrey County Council’s Local Transport Plan, including the proposed Local Transport Strategy and Forward Programme for the Guildford borough area, as and when this is prepared, revised and adopted.</p>
Walnut Tree Close can be used to accommodate up to 5000 dwellings without impacting on traffic	<p>Walnut Tree Close is in the town centre, and there are many brownfield sites in this area. Brownfield land is at the top of our spatial hierarchy. Potential development sites have been considered in the Land Availability Assessment (LAA) in accordance with the criteria set out in the NPPG. The LAA identifies sites that are realistic candidates for development, and sites that have been discounted, giving a reason. Areas of Walnut Tree Close are at high flood risk, and in accordance with national planning policy, not suitable for residential development. Many sites also are within the Corridor of the River Wey, which is a consideration which means high buildings may not be appropriate close to the river. The LAA has identified sites that are at present, considered to be realistic candidates for development in Walnut Tree Close over the plan period. The evidence does not support accommodating 5000 homes in this area.</p>
Internet shopping - less shop space needed so can use for housing	The Retail and Leisure Update Study 2014 (published 2014) includes considerations of changes in level of internet shopping and how much of this is

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	sourced from warehouses rather than stores.
Need a tougher policy so University will accommodate all students	Policy H1 'Homes for All' of the 'Proposed Submission Local Plan: strategy and sites' expects 60% of student accommodation to be provided on the university campus. Students have a free choice over where they live so it is not reasonable to expect all students to be accommodated on campus.
Residential areas can benefit from some open space as well as schools and medical facilities	Agreed, the policy recognises this and requires play and recreation and other public spaces to be integrated into large new developments. A number of sites have been identified for education uses, and health uses.
Better to provide mixed uses only in new developments and focus on well-designed residential areas.	The policy will apply only to new build schemes over 20 or more dwellings or 0.5 hectares or more.
Town centre- should build flats above shops to increase night time economy	The policy recognises the need for a mix of uses in appropriate locations.
Town centre - already enough commercial land	A more detailed response to such commercial land is included within the table relating to Policy 13
Too easy for developers to ignore	The 'Proposed Submission Local Plan: strategy and sites' will hold some weight in the planning process once public consultation is underway, if the document is subsequently adopted it will be a statutory document that will form the basis of planning decisions.
Flexible approach: <ul style="list-style-type: none"> • A one size fits all approach is not the right one • Designs should be flexible to avoid homogeneity • New builds make homogeneity easier 	<p>The policy will require development proposals to address the individual site's context. It is not our intention to have a one size fits all approach.</p> <p>All development will be required to respond to its individual context and site characteristics.</p>
Shouldn't be used to restrict or control development	This policy will be applied to all new developments of 20 dwellings or more or proposals on sites with an area of 0.5 hectares or more. The policy will be used to help ensure high quality new development.
Lifetime homes shouldn't be included within housing provision to support Government policy of integrated and community care	Not covered by this policy, 'Policy H1 Homes for All' says that "We will support the provision of well designed specialist forms of accommodation in appropriate sustainable locations, taking into account local housing needs." The reasoned justification explains that we want a flexible housing stock that is accessible, adaptable and age-friendly. This will enable people to be supported in their own homes for longer should they wish.
Cannot have community places on all large sites (0.5ha)	Each site will be reviewed against the policy on an individual basis and the policy applied accordingly.
Shouldn't just be for residential	The policy will apply to all forms of development and not just residential where the site area is more than 0.5 hectares.
Building in rural areas cannot support the statement where people can move around easily without the need for a car	<p>Comment noted.</p> <p>The National Planning Policy Framework states that "The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice</p>

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	about how they travel. However, the Government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas.” (paragraph 29).
<p>Height of buildings:</p> <ul style="list-style-type: none"> • High-rise should be avoided as they can be detrimental to TC • Only two storeys of a building should be allowed above ground. 	The policy will ensure that all development take account of its immediate context. However, we cannot restrict development to two stories through this policy.
Development should be better integrated to the River - can also improve transport problems with cycling and walking	<p>The policy will ensure that all development take account of its immediate context.</p> <p>The River Wey towpath around Parsonage Watermeadows (linking the A25 to A320) is to be improved in 2016, in a project funded by the Enterprise M3 Local Enterprise Partnership and Guildford Borough Council, and working with the National Trust.</p>
Policy is just a statement of current and good practice	Whilst the policy is based on national guidance it has been amended and expanded since the first draft.
We don't follow our own guidelines	If adopted the policy, together with the rest in the proposed Submission Local Plan will form the basis for all planning decisions.
4.72 - In line 2, after "improvements in the built environment" add "(eg the removal of wooden electricity poles and overhead cables which are ugly and environmentally intrusive in many roads in Ash etc). Many telephone cables should also be underground. But...".	We cannot require the removal of overhead cables through this policy which is directed towards developments of 20 or more dwellings or sites of 0.5 hectares or more.
Countryside properties are capable to deliver a benchmark for design quality	Comment noted
Won't be a sudden shift to non-car based - no car parks mean dangerous parking on road	The policy requires new developments to design in sustainable transport options and will also ensure that car parking is integrated into the design of new developments.
Would like restrictions to make sure every bit of land is used to maximum efficiency	We will expect development to respond to local character and take into account the existing grain and layout of the area.
Why are houses being built where a commute will be necessary?	This policy will not be applied in isolation, Policy S1 'Presumption in favour of Sustainable Development' of the 'Proposed Submission Local Plan: strategy and sites' will be used to ensure that developments are in sustainable locations.
New houses often have small rooms and windows with poor lighting and this leads to poor health	This is a strategic policy and does not cover this element of detailed design. The 2004 Residential Design Guide will remain in place.
Object that we need to accommodate growth, could do this until we are urbanised, need to maintain existing character	These comments have been responded to in Appendix C: Evidence Base and Policy 9.
Should not provide mix used areas as they are unsafe	Mixed use schemes, especially in town centres, help to provide safer environments and create places where services and facilities are readily accessible to residents.
Guildford Borough Council will want to build to gain CIL but real infrastructure needs will have to be provided by other bodies which could create a gap	CIL is only intended to provide funding to fill the gap in main funding sources
Walnut Tree Close would mean people can walk to amenities and most of 5 year housing can be taken up in this area	The sites that we expect to come forward during the life of the plan are set out in the sites allocations document.

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More provision of open space	The policy will require developers to provide places for communities to meet and interact, such as play and recreation and other public spaces in large developments.
Rules to ensure smaller homes do not degrade an area	The policy will ensure that a high quality design of all new homes on sites over 20 dwellings or 0.5 hectares.
Should only allow development that <ul style="list-style-type: none"> • Does not impinge on GB • Have adequate, fully funded infrastructure • Truly sustainable 	This policy will not be applied in isolation, Policy S1 Presumption in favour of Sustainable Development will be used to ensure that developments are in sustainable locations.
Big builds would severely impact on sense of place and ability of villages to do fund raising events due to lack of parking	The site allocations show the sites that we expect to come forward during the life of the plan. This policy will not be applied in isolation, Policy S1 Presumption in favour of Sustainable Development will be used to ensure that developments are in sustainable locations.
Need further monitoring indicators than building for life criteria- perform well	Monitoring indicators have been expanded to include numbers of appeals for applications won on design issues.
Wording for cyclists is too vague - need major improvements	This policy will not be used in isolation and there are a number of transport policies that cover this issue.
Proposals in Ash Green are polar opposite to this	Comment noted
Need to make sure that high quality design is enforced	Development will be assessed against the criteria in this policy which will help to ensure quality of design of new development.
Need a Residential Design Guide, like July 2004	The 2004 Residential Design Guide remains in place until such a time as a replacement is drafted.
Should excel as much in design as we do in other areas	Agreed.
Opposition to incineration may mean a need to study effects before implementing	Incineration is generally considered more sustainable than disposal to landfill in most cases. Policy 7 (policy D2 of the Proposed Submission Local Plan) sets this out in more detail. Energy from waste is a nationally used technology and studying the effects of this technology would be the responsibility of national government.
Flooding needs to be seriously considered in all developments	The 'Proposed Submission Local Plan: strategy and sites' includes a policy on flood risk (Policy P4 Flood Risk). The proposed site allocation policies have also been informed by a Strategic Flood Risk Assessment (Level 1 and 2) and flood risk sequential test.
Could build high rise in Ladymead to provide a mix of housing	The sites that we expect to come forward during the life of the plan are set out in the sites allocation document.
Need to protect green distinctiveness of Guildford	The policy requires developments to respond sensitively to the characteristics of each individual site.
It is car use we need to discourage, not car ownership, or else people will just park on the roads	<p>Comment noted.</p> <p>The National Planning Policy Framework states that "The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice</p>

Issue	Guildford Borough Council Response
	about how they travel. However, the Government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas.” (paragraph 29).
Need a design and access statement	The design and access statement for certain types of development is a national requirement.
Para. 4.70. We recommend an insertion here to read as follows; “.We are keen that development is shaped to create places that are good to live in, sociable and interesting, with access to green and wildlife-rich [or] bio-diverse open space.”	The policy includes a requirement for new developments to create open space
Places should be designed to provide open spaces and support biodiversity	The policy requires developments to provide recreation and open space.
Should master plan for all major developments	This is a strategic policy and does not provide specific guidance for individual sites.
Preserve skylines	This policy will require developments to respond to their setting, views and skylines will be taken into account.
<p>Large scale residential developments (20 or more dwellings or 0.5 hectares or more:), informed by the Guildford design principles must:</p> <ul style="list-style-type: none"> • provide a harmonious, integrated mix of uses that fosters a sense of community and contributes to the creation of inclusive communities that provide the facilities and services needed by them; • provides places for communities to meet and interact, such as play and recreation and other public spaces in large developments; • Are provided with adequate vehicular and public transport links • Plan positively for non-car based modes of transport; • Be designed to facilitate and promote walking as a means of transport, providing a high quality environment for pedestrians. Where possible residential areas should allow short walking distances to amenities; and • Provide convenient and safe routes through the development and to nearby areas for cyclists. 	The policy has been amended to ensure that new development creates places that are easy to go to and through and provides convenient and safe routes through the development for pedestrians and cyclists.
Mix of uses should only apply to large scale urban developments	The policy only applies to developments 20 dwellings or 0.5 hectares or more.
Cities should not be solely made up of statement buildings	Comment noted.
Make more of park and ride facilities	Comment noted.
Agree that developments over 20 dwellings should provide for mix of uses	Comment noted.
Don't want to become completely urbanised	The Borough has a large proportion of Green Belt land that will remain undeveloped, the sites allocation document shows the development sites that we expect to come forward during the life of this plan.
Support innovative architecture as don't want Guildford to become undesirable	Comment noted.
Normandy is unlikely to become a better place	This policy is one of a number of policies that will be used to ensure a high standard of design in all new development.
Should use BREEAM ratings Good design across all types of homes is essential, along with high 'green'	The Council currently requires a BREEAM Very Good rating for new commercial buildings through the Sustainable Design and Construction SPD. Policy D2 of the

Issue	Guildford Borough Council Response
credentials and BREEAM ratings.	Proposed Submission Local Plan Strategy and Sites requires sustainable design and construction practice as a strategic matter. The implementation of BREEAM standards in policy may be more appropriately addressed through development management policies in the Local Plan Development Management document.
Should include details on how to create communities and how the plan will support	This policy will be used in combination with the others in this plans to help sustain and create sustainable communities in the Borough.
Policy should be made more concise	The policy has been amended together with the supporting text. We believe that it could not be more concise and still include all the elements that are required to ensure a high standard of design.
Would also like to see something in this and in plan around creating community - i.e. how the plan will support and develop safer stronger more caring communities. We would also like to see something in this and in plan around creating community - i.e. how the plan will support and develop safer stronger more caring communities	This policy recognises the need to create communities, it requires developers to provide a mix of uses that foster a sense of community and also to provide places for communities to meet and interact.
Policy 6 (Making Better Places) could be condensed into a few points. - "4.86 The NPPF sets out the government's vision of sustainable development, and highlights the key themes that should be addressed including...etc " This essentially repeats what is already stated in more detail in previously points. - Paragraphs 4.186 and 4.187 essentially say the same thing. Could be made more concise and easier to plough through	The policy has been amended together with the supporting text. We believe that it could not be more concise and still include all the elements that are required to ensure a high standard of design.
The Parish Council [Normandy] has been particularly concerned to note that recent planning permissions (Tatra now Cunningham Close and Beech Lane Affordable Homes) have approved construction of houses with ridge heights far higher than surrounding properties and that these have interfered with the openness of the general landscape. This is a new phenomenon. The ridge heights are more in keeping with 3 story build than 2. They are also concerned regarding density upon which we have commented throughout. In respect of Tatra permission was given to lower the slab height in order to accommodate the ridge height but this still did not mitigate the effect.	The Proposed Submission Local Plan policy D2 requires all developments to "respond meaningfully and sensitively to the site, its characteristics and constraints, and the layout, grain, massing and height of surrounding buildings." Following adoption of the Local Plan, new development proposals will be considered against this policy, and all other relevant policies and material planning considerations.

Comments on Policy 7: Sustainable design, construction and energy

Issue	Guildford Borough Council Response
Wording: <ul style="list-style-type: none"> The policy is a statement of ideals, not a policy We should require rather than expect, avoid wishy washy terms like 'give strong support and encouragement' The statement of "our ambition" is the planning equivalent of the lawyers' "agreement to agree" which is barely worth the paper it is printed on. 	The language in the revised policy has been strengthened and the requirements are now clearer.
Targets:	The monitoring section now includes targets. The policy now includes a specific target for a minimum 10 per cent reduction in carbon emissions on new

<ul style="list-style-type: none"> • The policy needs to establish specific targets rather than use terms such as "the highest... as are practical and viable" even if the two concepts work in tandem by adding "...but not lower than..." • The policy needs to include targets • There needs to be clarity of targets and a clear understanding of what third party involvement needs to be secured (eg., infrastructure providers). 	<p>development and support for the currently adopted "optional building regulation" for water efficiency. The Sustainable Design and Construction SPD provides greater detail on what the policy means.</p> <p>The policy has been made clearer so there is less ambiguity in what development proposals should achieve or avoid. The policy primarily deals with design and construction practice on-site so third party involvement is not expected to be a significant issue. Regarding district heat and decentralised energy, it is acknowledged that this may involve infrastructure providers. However, it is expected that applicants will consult with third parties as appropriate, and that further consultation will be undertaken during the planning application stage.</p>
<p>Negotiation:</p> <ul style="list-style-type: none"> • Negotiation should not be permissible. • Developers will be able to cook the books to negotiate lower standards 	<p>The planning application stage can include some element of negotiation. This is a function of the UK planning system and is outside the Council's control.</p>
<p>The viability reference should be removed as it is a get-out clause</p>	<p>The viability references have been removed from the policy.</p>
<p>Biodiversity:</p> <ul style="list-style-type: none"> • 'biodiversity improvements' and 'water efficiency measures' need to be expanded upon, currently it has no meaning • 4.101 (biodiversity) is woolly and meaningless • reword "Biodiversity improvements" to "The policy ensures that new developments increase our biodiversity..." (instead of "contribute to maintaining"...) • the Government's policies relating to biodiversity reflects both its conservation (maintenance) and enhancement. These should therefore be enshrined in the policy. 	<p>The policy now refers to the Sustainable Design and Construction SPD, where a standard for water efficiency is given. The policy supports the currently adopted target of 110 litres per occupant per day. This may be reviewed at a later date. Biodiversity is now dealt with under Policy I4 Green and Blue Infrastructure, which sets out an approach to biodiversity within developments. A detailed approach will be set out in a future SPD. Enhancement is enshrined in policy in Policy I4 and will be further addressed in the SPD</p>
<p>The policy is weak on how conflicting priorities will be resolved</p>	<p>The 'Proposed Submission Local Plan: strategy and sites' must be read as a whole. Any conflicting priorities will be resolved during the planning application process.</p>
<p>The policy should introduce minimum technical standards/Code BREEAM requirements</p>	<p>The government has withdrawn the Code for Sustainable Homes. The policy supports the Sustainable Design and Construction SPD which includes a minimum BREEAM standard for commercial buildings.</p>
<p>Paragraph 4.77 should state "Our Corporate Plan sets out how we will ensure good practice in sustainable development across the borough."</p>	<p>The supporting text has been rewritten.</p>
<p>Where still functional buildings are to be demolished, the cost of wasted materials and embodied energy should be included in the overall sustainability evaluation.</p>	<p>The policy discourages the waste of materials. Requiring developers to perform a life cycle analysis of all the materials on site in order to establish the carbon cost of demolition is likely to be considered onerous.</p>
<p>Emerging Policy 7 clearly needs to be explicit on both viability and feasibility, in order to be effective in NPPF terms. The present wording serves no purpose in respect of seeking to enforce any particular standard, and thus simply seeks an aspiration. Further consideration is required as to how the policy may be articulated in development proposals at the development control stage and ensure compliance with the emerging Housing Standards Review.</p>	<p>The policy has now been strengthened and made more clear in order to set out the proposals a development should seek to achieve or avoid. The policy avoids setting technical standards, except for the minimum proportion of on-site low and zero carbon energy, so is compatible with the housing standards review. The policy supports the Sustainable Design and Construction SPD which implements the new optional building regulation for water, one of the outcomes of the housing standards</p>

Requirements should be clear as per NPPF 154	review.
The policy should exceed the national Zero Carbon standard – Passivhaus	Government has stated that technical standards for energy efficiency should be set only through building regulations.
The current requirement for a 10% reduction through renewable energy is far too low. The policy should increase a more ambitious requirement.	The policy retains 10 per cent as a minimum percentage for carbon reduction, but asks for a reasonable reduction. The SPD may set out guidance for what may be considered reasonable as the evidence base in this area develops. It is likely that the reasonable requirement may change over time as technology improves and becomes cheaper, so the Council is reluctant to lock a particular figure into a strategic policy.
All new developments should incorporate solar gain and solar heating	National policy prevents local planning policy from being too prescriptive. Mandating particular technologies (solar heating) is likely to be considered as such. The policy requires sustainable design including the use of building orientation and layout, which cover solar gain.
The policy should support a knowledge bank of research and consultants' reports identifying what is possible in the borough and what can broadly be ruled out. For example, ground permeability studies might enable the installation of more Sustainable Urban Drainage Solutions ('SUDS').	The evidence base supporting the Proposed Submission Local Plan: strategy and sites' includes the Renewable Energy Mapping Study (referred to in the supporting text) which identifies parts of the borough suitable for particular technologies and an updated Strategic Flood Risk Assessment which identifies areas suitable for the provision of Sustainable Drainage Systems (SuDS).
Wind turbines and solar farms must have planning guidance or presumption against such installations unless they can be shown to have minimal visual impact on key views.	National guidance is available for both these development types which deals with the impacts on views.
Where possible otherwise, new development should drain to soakaways and land drains rather than add to the pressure on surface water drains.	Policy P4 covers flooding and supports and encourages the use of SuDS.
The Local Plan should facilitate water company infrastructure for storage of water for the water supply	The 'Proposed Submission Local Plan: strategy and sites' infrastructure schedule considers where the water supply network will need upgrades to support development
There should be a clear link between increased rainfall and rainwater harvesting, and slowing the flow of rainwater (e.g. permeability and SUDS), and flood risk resilience. Redevelopment should be seen as an opportunity to deliver this.	This detailed point would more appropriately be explored within development management policy or guidance. We will consider this when producing the Sustainable Design Construction and Energy SPD and the Local Plan: Development Management Policies DPD.
Specific targets for energy efficiency, renewable energy	The policy supports a target for low carbon energy. The government has signalled that technical standard for energy efficiency should be delivered through building regulations only.
The policy should explicitly support grey water re-use	Water use efficiency is considered the first step. The policy does not explicitly support grey water reuse as this is less sustainable than using less water. Grey water reuse systems are usually powered so produce carbon emissions.
The policy should require car charging points in all new developments There should be a minimum renewable energy requirement that includes energy for charging electric cars	This is unlikely to be considered achievable in all developments. The policy now includes support for measures that support the sustainable lifestyle of building occupants, which includes vehicle charging points.
Emphasis on waste material reuse is supported, Supports policy CW1 of the Surrey Waste Plan and SM5 of the Surrey Mineral Plan	Comments noted.

Core Strategy	
The policy does not go far enough to support para 4.100 (resource efficiency) or SMP Core Strategy policy MC4.... A fourth bullet point should therefore be added to the second paragraph of Policy 7 under 'the use of materials, both in terms of embodied carbon and energy efficiency' to read as follows: "the efficient use of mineral resources and the incorporation of a proportion of recycled and/or secondary aggregates in new development" ..	This sentence has been added to the policy.
This chapter should include references to facilitating allowable solutions to achieve zero carbon homes and to BREEAM levels for commercial buildings or indicate whether these issues will be dealt with in the second part of the Local Plan.	Policy D2 supports the Sustainable Design and Construction SPD which includes a BREEAM standard for commercial buildings. As guidance, the SPD sets out what is considered to constitute sustainable development as required by Policy D2. The government has signalled that zero carbon homes will now not be introduced in 2016 and has not indicated when/whether it will. If the national situation changes, or circumstances change, guidance can be updated through an update to the SPD.
The chapter should indicate how the design and construction of developments can contribute to sustainable transport such as through building design, on site infrastructure and layout. The policy should have more emphasis on sustainable transport	Sustainable transport is addressed through Policy I3 "Sustainable transport for new developments". Policy D2 requires the provision of measures that support sustainable lifestyles, which would include the provision of bicycle parking and electric vehicle charging points.
The policy should future proof all new homes to the highest degree and set the percentage of energy need through on-site provision of renewable and low carbon technologies at well above the minimum as the technologies are available for this to be feasible.	The policy requires a minimum carbon reduction through the provision of low and zero carbon technologies. The policy now supports the Sustainable Design and Construction SPD which sets out the percentage. This SPD can be reviewed as more evidence on feasibility becomes available.
The policy should cover air quality	The policy is a sustainable design, construction and energy policy. There is limited scope for the Local Plan to govern air quality, except through policies on sustainable transport and pollution emitting development. The borough does not have particular issues with polluting emissions from industrial buildings. Sustainable transport is addressed through Policy I3 "Sustainable transport for new developments".
There should be a monitoring indicator of estimates of energy saved by elimination and efficiency.	It is not clear that this data exists. The Council intends to largely use national data on domestic and commercial energy use to monitor changes in energy efficiency.
The Policy should be an SPD, and include Code and BREEAM	SPDs must form guidance and not policy. Policy D2 supports the Sustainable Design and Construction SPD which includes a BREEAM requirement for commercial buildings as guidance on how sustainable development as described in the policy can be achieved. The government has now withdrawn the Code for Sustainable Homes so this has been removed from the SPD.
Could address/reference growth in the environmental technology sector	We want to keep the hierarchies succinct, but have amended the supporting text to make it clear that other steps may be more sustainable than recycling.
Step 3 of 'The Waste Hierarchy ' should include the following insertion "where recycling is the most sustainable option"	The supporting text has been rewritten and makes it clear that the steps should not be followed where there are more sustainable options.
The policy should make a great distinction between actions to improve resilience and actions to improve sustainability	Policy D2 refers to an SPD which will be updated in due course. The policy requires both climate change mitigation and adaptation, as well as other sustainability actions. The SPD will provide guidance on appropriate actions and will make a

	distinction between mitigation/sustainability actions and adaptation measures.
The policy should discuss the three dimensions of sustainability, possibly at para. 4.86. It should be made clear where the list at 4.86 is drawn from.	References to NPPF paragraphs have been added to the list. The objectives of the plan are now structured according to the three dimensions of sustainability.
The policy could include flood risk, but this should ideally have its own strategic policy.	The 'Proposed Submission Local Plan: strategy and sites' includes policy P4 to specifically address flood risk.
Benefits will be swamped by the scale of development	The NPPF requires that we meet our objectively assessed development needs where sustainable to do so.
The policy should require water metering	New dwellings are generally required to have water meters already and water companies are currently rolling out meters to all dwellings.
The policy should commit to a timed and council-funded programme of renewable energy sources in rural villages based on digesters, reducing the need to collect recyclable domestic and green waste using municipal waste vehicles powered by fossil fuels. These should form the basis of micro-CHP schemes in villages.	Council funded programmes such as this are not generally a matter for the local plan. However, Policy D2 provides strong support for decentralised energy. These comments have been passed on to the relevant team in the Council.
The plan needs to programme in infrastructure to avoid retrofitting later on (carbon costs)	Infrastructure is programmed into the Local Plan. The Infrastructure Delivery Plan sets this out.
Building on Green Belt should include a requirements that: all roof areas not needed for solar energy recovery or essential services covered with "green" or "living" roofs the sites should be built without any street lighting installed.	Green roofs may not be appropriate on all developments. Such a prescriptive requirement would likely be considered onerous. Policy I4 Green and Blue Infrastructure supports the provision of biodiversity enhancements and specifically references green roofs and walls. The future Green and Blue Infrastructure SPD may develop guidance setting out how and where green roofs should be delivered.
Existing homes need to improve energy efficiency. The plan doesn't address this.	The majority of energy retrofitting measures do not require planning permission so cannot be regulated by planning policy. However, the supporting text in Policy D2 identifies the need to improve efficiency in existing buildings and offers support for this.
New homes should demonstrate/be designed to accommodate future loft conversions efficiently.	This is not considered a matter for strategic policy. This may be considered in the development management policies.
The Wey floodplain should be identified as a resource for reducing flood risk and an area that needs to display designs that promote resilience for flooding	The Council's approach to development in areas at risk of flooding is set out in Policy P4 of the 'Proposed Submission Local Plan: strategy and sites'. The sequential approach will be applied to ensure development is directed towards areas at least risk first. Where development meets the sequential test and is located in areas at greater risk of flooding, the proposal will be required to meet various requirements including demonstrating that it will be safe and resilient to flooding across its lifetime.
All homes should meet the water target in Code 3 (110 litres pp pd) as a minimum	The Council has already adopted this standard (which is an "optional building regulation"). Policy D2 continues support for this standard.
The policy should include explicit support for: <ul style="list-style-type: none"> rainwater harvesting Swift nest boxes designs that take account of solar gain 	The policy supports rainwater harvesting (in line with the energy and waste hierarchies) and designs that take account of solar gain. Policy I4 Green and Blue Infrastructure requires biodiversity enhancements on new developments. A future SPD may identify swift nest boxes as an appropriate option.
Developers should be required to prove that sustainability targets are being met,	Planning applications are assessed on the evidence provided. Developers cannot

with a requirement for additional measures if they fall short.	be compelled to provide further evidence after planning permission has been granted. If developments do not meet the standards they have set out in their application, there could be a case for enforcement action. However, this is likely to be difficult for matters relating to sustainable construction.
There should be a requirement that the responsibility for the maintenance of SUDS and other green areas is clearly defined through the planning permission.	This is not considered to be a matter for strategic policy. This may be considered when development management policies are produced.
The policy should support a solar farm for Guildford (potentially on Liddington Hall).	The policy supports decentralised and renewable energy, which could be based around solar power. The Guildford Renewable Energy Mapping Study identifies areas that are suitable for certain types of renewable energy. The owner of the land at Liddington Hall has not indicated that they want to use the site this purpose.
The policy should ban wind and solar farms. Studies show that these developments do very little to reduce carbon emissions. Wind developments cause additional fuel consumption. Wind turbines will harm the special character of the borough.	It is unlikely that local planning policy would be able to ban onshore wind and solar farm developments outright in all circumstances. National policy regarding these developments is robust and they are tested against their impact on the character of the area as a matter of course.
There should not be a policy regulating carbon emissions <ul style="list-style-type: none"> National policy is for carbon emissions to be controlled through building regulations The ongoing changes to the Building Regulations requirements successfully drives forward sustainable construction and facilitates the reduction in carbon emissions. Therefore, it seems unnecessary to force the applicant to prove upon submission of a planning application that a development will meet a minimum percentage of its energy needs. This adds an additional layer of expense and red tape for what is, at that stage, just a paper project and something which will be need to be proven at a later date once a building regulations application is submitted. 	The Planning and Energy Act 2008 grants Local Authorities the power to require developments to provide a percentage of the energy on-site through the provision of renewable and low carbon energy technologies. Since this comment was written, the government considered removing this power when drawing up the Deregulation Bill, but decided not to remove it following a debate in parliament.
The policy should not support waste incineration by including it on the hierarchy/supporting text	Waste incineration is considered to be more sustainable than landfill in most cases as it provides a substitute for fossil fuel energy.
There is text missing from the end of step 4 in the energy hierarchy	This text was cut off in the PDF version of the plan and has been replaced.
It is not clear that the policy is viable/costs have not been researched	National policy prevents requirement being applied where they are not viable. Developers have a chance to demonstrate this during the planning application process.
The Draft Local Plan contains no suggestion of how water supply will be increased to meet the new demand.	The Local Plan infrastructure schedule considers where the water supply network will need upgrades to support development
The policy should favour higher density development within existing urban areas <ul style="list-style-type: none"> Potential for sustainable transport More efficient use of land 	The 'Proposed Submission Local Plan: strategy and sites' needs to balance competing demands, and positively seek opportunities to meet the development needs of the area. There are opportunities for high-density development in sustainable locations, but this needs to be considered alongside other considerations, particularly where there is a conservation area or listed buildings. The Land Availability Assessment has considered individual sites and identified a potential suitable density for development, making the most efficient use of land possible urban areas and within villages.

<p>Car pollution levels in Guildford should be monitored and published so help people understand the need to reduce car use.</p>	<p>The Environment Act 1995 established a system of Local Air Quality Management whereby local authorities review current, and likely future, air quality. If concentrations of pollutants exceed the Government's national air quality objectives at 'relevant receptors', which are typically where people live or spend prolonged periods of time, an Air Quality Management Area is designated and a plan is formulated to address the issues.</p> <p>Guildford Borough Council's first review and assessment for the borough was published in November 2000 and further annual reports have been produced to date. Recent annual reports can be found at http://www.guildford.gov.uk/airqualityreport</p> <p>There has been no exceedance of the Government's national air quality objectives at relevant receptors in Guildford borough. Accordingly, there are no Air Quality Management Areas.</p>
<p>It is unclear how the policy will relate to rural exception homes and Green Belt developments</p>	<p>The policy sets standards for sustainable design, construction and development and will apply to rural exception homes and Green Belt developments.</p>
<p>How will this policy be monitored?</p>	<p>Monitoring indicators are given at the end of the chapter.</p>
<p>National policy is not supporting renewable energy enough</p>	<p>Comment noted.</p>
<p>The monitoring indicators for both waste and biodiversity are not given.</p>	<p>Monitoring indicators for waste have now been included. Monitoring indicators for biodiversity are included under Policy 14.</p>
<p>The policy should be accompanied by a Supplementary Planning Guidance document</p>	<p>The policy now supports the Sustainable Design Construction and Energy SPD.</p>
<p>To ensure sustainable use of water supply, the Council/policy should provide planning guidance and support for the development of on farm reservoirs or shared reservoirs, and by requiring larger development proposals to assess the impacts on availability of water supply to agriculture.</p>	<p>The Local Plan infrastructure schedule considers where the water supply network will need upgrades to support development included in the 'Proposed Submission Local Plan: strategy and sites'</p>
<p>Paras. 4.89 and 4.98 are confused.</p>	<p>The supporting text has been rewritten</p>
<p>The policy needs to discuss conflicts in sustainability, e.g. between solar power and a valued landscape, corkscrew turbine harming wildlife – constraints</p>	<p>We think it appropriate that conflicts should be balanced at the planning application stage by the decision taker.</p>
<p>The policy should rule out the use of countryside land/Green Belt as unsustainable because:</p> <ul style="list-style-type: none"> • Rural developments will be more reliant on oil based transport • Greenfield land is a limited resource • Green space is needed to mitigate flood risk/absorb flood water • Agricultural land is needed for food security and to reduce food imports • Green space improves air quality • Green space provides recreational opportunities • The countryside is a heritage asset • The countryside provides health benefits • Urban environments are often shabby and need regeneration 	<p>These comments have been responded to in the table for Policy 10 (Green Belt).</p>

<ul style="list-style-type: none"> • Countryside land may contribute to meeting energy needs through fracking • There is ample brownfield land (including on Walnut Tree Close) to meet the borough's housing and other development needs 	
<p>The policy does not address protection and improvement of the countryside</p>	<p>Please refer to Policy I4 'Green and Blue Infrastructure' of the 'Proposed Submission Local Plan: strategy and sites'.</p>
<p>The scale of development proposed in the Local Plan is not sustainable</p> <ul style="list-style-type: none"> • The infrastructure will not be able to cope • Character will be detrimentally impacted 	<p>Our spatial strategy is based on sustainability considerations. See Sustainability Appraisal for more information.</p> <p>The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure to support the planned development which is expected to place extra pressure on existing infrastructure, or to need new or improved infrastructure. The IDP will be updated as further detail on supporting infrastructure is available. Developer contributions and other funding sources will be used to ensure that key infrastructure is delivered when it is needed, including at the planning application stage.</p> <p>Any proposals will need to demonstrate at planning application stage that they are of high quality design and in keeping with the character of the surrounding area. In response to this concern the 'Proposed Submission Local Plan: strategy and sites' includes a new policy on development in urban areas and inset villages.</p>
<p>The policy should rule out certain developments:</p> <ul style="list-style-type: none"> • Where the water supply is under pressure • Where there would be impacts on a SSSI, SNCI, SPA, ancient woodland • Where sustainability of the environment as a whole would be threatened • That uses land that is needed for food production • Developments that would be dormitory suburbs/require carbon heavy transport 	<p>Policy D2 (and Policy 7 which it replaces) deal with sustainable design, construction and energy. The location of development is dealt with under Policy S2 Borough Wide Strategy.</p> <p>The majority of constraints to development are not showstoppers. The NPPG says, <i>"Where constraints have been identified, the assessment should consider what action would be needed to remove them (along with when and how this could be undertaken and the likelihood of sites/broad locations being delivered)."</i></p> <p>The 'Proposed Submission Local Plan: strategy and sites' needs to balance competing demands, and positively seek opportunities to meet the development needs of the area. Where land is too constrained to be sustainably developed, it has not been allocated in the 'Proposed Submission Local Plan: strategy and sites'.</p>
<p>The site selection process did not take account of surface water flooding and has allocated sites in those areas. This is not sustainable. The sequential test should be rigorously applied.</p>	<p>The 'Proposed Submission Local Plan: strategy and sites' is supported by a sequential test and Level 1 and 2 SFRA.</p>
<p>Wisley Airfield is significant in preventing flooding around Ockham and should not be built on</p>	<p>The 'Proposed Submission Local Plan: strategy and sites' is supported by evidence base documents relating to flood risk, including the Guildford Surface Water Management Plan, the SFRA (level 1 and 2) and the flood risk sequential test. Further detailed consideration to flood risk would be taken during the determination of a planning application. The NPPF states that "When determining planning</p>

	applications, local planning authorities should ensure flood risk is not increased elsewhere”.
The site selection process did not take account of groundwater protection zones and aquifers, this information was not published. The policy should rule out building in flood zones.	The ‘Proposed Submission Local Plan: strategy and sites’ is supported by a sequential test and Level1 and 2 SFRA.
The number of homes proposed in the DLP is not sustainable/will prevent us from meeting climate change targets	This has been considered as part of the Sustainability Appraisal process.

Comments on Policy 8: Surrey Hills Area of Outstanding Natural Beauty (AONB)

Issue	Guildford Borough Council Response
Detail needed to consider policy 8, which will be set out in the DC policy is missing.	Policy P1 (the renamed Policy 8 of the Draft Local Plan) of the ‘Proposed Submission Local Plan: strategy and sites’ provides a strategic overview of how planning applications for development proposals in the AONB and adjacent AGLV will be considered and the requirements they will need to comply with if they are to be considered for approval. Landscape character outside of the AONB will be protected through criteria based policies outlined in the forthcoming ‘Development Management Policies’ DPD.
Wording clarity needed in regards to ‘specific types of development’	The wording has been used to emphasise that the AONB designation does not in itself prevent the development of any particular land use in the AONB. The wording has been retained in Policy P1 of the ‘Proposed Submission Local Plan: strategy and sites’ because it is considered to be clear and concise.
No development at all in AONB or AGLV No significant transport improvements should be allowed in the AONB either	The AONB will be awarded the highest level of protection and proposals for major development will be refused unless exceptional circumstances exist and the development is in the public interest. This approach is in line with that outlined in the National Planning Policy Framework. However, communities within the AONB will have their own development needs and the policy wording has been designed to allow small developments which are appropriate and sensitive to the site’s AONB location. The AONB also provides significant benefits to the borough’s population and visitor economy. The Council may therefore also support sensitive development proposals which increase access to the AONB.
<ul style="list-style-type: none"> • Actions of the Council to date and the proposal of the Local Plan don’t support the AONB and AGLV and conflict with Policy 8 • Expansion of Chilworth as an AONB settlement is contrary to the purposes of the AONB • Blackwell Farm should not be a strategic site – goes against NPPF • Shouldn’t build on the Pewley Downs 	<p>Comments relevant to site allocations are addressed in the ‘Planning for sites’ tables. However, Policy P1 of the ‘Proposed Submission Local Plan: strategy and sites’ states that any future proposals for major development in the AONB will only be approved in exceptional circumstances and where the development is in the public interest. All development proposals within the AONB or AGLV will be required to respect the AONB’s setting and comply with a range of principles designed to protect the AONB’s special landscape and built heritage.</p> <p>The ‘Proposed Submission Local Plan: strategy and sites’ does not propose</p>

	<p>development sites on Pewley Down, or major development in the AONB.</p> <p>Paragraph 86 of the NPPF states that unless a village makes an important contribution to the openness of the Green Belt it should not be included within the Green Belt. Volume 4 of the Green Belts and Countryside Study (GBCS) has assessed all our villages based on the requirements of the NPPF.</p>
Policy in DM should look at enforcement of land up keeping within the AONB in accordance with its designation.	Comment noted. Development Management policies will be considered following the adoption of the 'Proposed Local Plan: strategy and sites' document.
Support giving the AGLV protective status	Development proposals in the ALGV will need to comply with the same principles as those in the AONB. The ALGV will retain its status until after a review of the AONB boundaries is undertaken by Natural England. Landscape character outside of the AONB will be protected through criteria based policies.
Policy protects the views but not the actual AONB itself	Policy 8 has been updated and renamed as policy P1. Policy P1 states that the AONB will be awarded the highest level of protection. Major development proposals in the borough will be refused unless exceptional circumstances exist or the development is in the public interest. This stance aligns with that of the National Planning Policy Framework.
Local Plan 2003 AONB policy wording should be retained	Policy P1 of the 'Proposed Submission Local Plan: strategy and sites' has been updated from the Draft Local Plan (Policy 8) to reflect new national planning guidance and the current management plan for the Surrey Hills AONB. The policy attempts to retain the same principles of the previous Local Plan whilst recognising, and not constraining, the borough's development needs.
Need to strengthen emphasis on the impact on view in and from the AONB and the setting not just from the AGLV	Policy P1 states that development which adversely affects the setting and views of the AONB will not be approved. As the AGLV surrounds the AONB, development within these areas is likely to have the most significant impact on the AONB's setting (except for development within the AONB itself). Views into the AONB will also be protected by ensuring that development proposals in the AGLV comply with the same principles required for development in the AONB.
Need a separate policy for the SPA	The 'Proposed Submission Local Plan: strategy and sites' Strategy and Sites includes new Policy P5 for the SPA.
Shouldn't remove Green Belt from an area designated as AGLV in Shalford	A review of the Green Belt boundary has been undertaken as part of the new Local Plan. The exercise is likely to result in the 'insetting' of some villages. Justification for this approach is provided within the response table for Policy 9 and Appendix C: Evidence Base. Green Belt is not a landscape designation. It should also be noted that the AGLV will retain its status until a review of the AONB is undertaken by Natural England. Any development proposed in the AGLV will have to consider the principles outlined in policy P1.
The Horsleys are in the AONB	The AONB boundaries have not changed since the area's original designation and are illustrated on the Council's proposals map. Most of West and East Horsley lie adjacent to, but not within, the AONB.
Support the policy	Comment noted

Policy states the obvious	The policy emphasises that the Council will seek to protect and enhance the AONB in accordance with the NPPF. This policy is required to ensure that the council fulfils its responsibility to preserve the AONB.
By excluding the AONB from development it puts more pressure on the Green Belt	The NPPF makes clear that AONB's should be given the same level of protection as National Parks. Policy P1 of the 'Proposed Submission Local Plan: strategy and sites' does not seek to prevent all development from the AONB but will afford it the highest level of protection in accordance with the NPPF. The borough is constrained by a number of planning designations and balancing our growth needs with protecting the natural environment is a key theme of the Local Plan. We have decided to approach this through the realignment of the Green Belt boundary and development of a small number of strategic sites primarily located on the urban fringe.
A more expansive 'Green fabric' policy is required	Comment noted. A broader green infrastructure policy is included in the 'Proposed Submission Local Plan: strategy and sites'.
Proposed extension of the AONB has not been considered	The supporting text to Policy P1 of the 'Proposed Submission Local Plan: strategy and sites' notes that Natural England hope to undertake a review of the AONB boundaries in 2018. Natural England have advised Guildford Borough Council that the candidate areas to be considered for inclusion within the AONB cannot be afforded the same level of protection as the AONB in the interim period.
AGLV designation should be removed as it is a local designation	The AONB boundaries will be reviewed by Natural England in 2018. Following the conclusion of the review the status of remaining AGLV land will be determined. Landscape character outside of the AONB will be protected through criteria based policies included in the forthcoming Local Plan: Development Management Policies DPD.
AGLV protection is not strong enough	Development proposals in the AGLV should demonstrate that they have complied with the same principles required of development in the AONB. However, as the AGLV designation is a local designation, it carries less planning weight than the AONB.
AONB is equivalent of a national park	In line with the National Planning Policy Framework, Policy P1 states that the AONB will be afforded the highest level of protection (the same as a National Park is) and there will be a presumption against major development within it.
Not enough info on the waste & minerals plan and how it is being considered.	Surrey County Council's Waste and Minerals Plan and its status in the Development Plan is described in the introduction to the plan.
Needs to include that development will include efforts to enhance biodiversity and extend public access	Policy P1 emphasises that all proposals will be considered against whether they maintain or enhance access to the AONB and conserve or enhance it's wildlife and natural beauty. The policy has also been updated to reiterate the NPPF's stance that AONB's will be afforded the highest level of protection in terms of landscape and scenic beauty
Paras 4.105 and 4.106 should be included in the policy	Comment noted.
Need to ensure DTC on the AONB	Guildford Borough Council will work collaboratively with Natural England and the Surrey Hills Management board throughout the AONB review process. We will also

	use the Surrey Hills Management Plan as a material consideration in the determination of planning applications. However, it will be for the Planning Inspector to decide if we have met the Duty to Co-operate.
AGLV should be protected beyond the natural England review	Following the Natural England review the status of AGLV land not incorporated into the AONB will be considered. Landscape character outside of the AONB, including any current AGLV which is not later redefined as AONB, may be protected through criteria based policies outlined in the forthcoming Local Plan: Development Management Policies DPD.

Comments on Policy 9: Villages and majorly previously developed sites

Issue	Guildford Borough Council Response
Support policy / facilitates sustainable development	Comment noted
Infrastructure must accompany development	The infrastructure needed to support the planned development is outlined in the Infrastructure Schedule in the 'Proposed Submission Local Plan: strategy and sites'.
Support development that doesn't harm the main purposes of the Green Belt / follows defensible features/appropriate to location	Comment noted
Clarification on what is meant by development of new businesses in villages	The NPPF supports a prosperous rural economy which includes the sustainable and appropriate growth and expansion of all types of business and enterprise in rural areas.
Main town centre uses not appropriate in villages	The NPPF states that the sequential test should be applied to planning applications for main town centre uses that are not in an existing centre. However small-scale development of these uses in the villages are not subject to the sequential approach. Small-scale in Guildford means less than 100 sq m (gross). This size threshold will limit the type of main town centre use that can be built areas outside existing centres in the villages.
Need to balance housing and jobs	As part of determining our objectively assessed need we need to consider the level of jobs growth that is expected in the borough to ensure there is an alignment with the level of housing that is planned.
Need more affordable housing/smaller homes	The 'Proposed Submission Local Plan: strategy and sites' proposes to require more sites to contribute, and at a higher proportion. The starter homes price cap will mean that they will be smaller homes.
Guildford has a high housing need	Comment noted
Object to inseting / no NPPF requirement to do it	Paragraph 86 states that unless a village makes an important contribution to the openness of the Green Belt it should not be included within the Green Belt. Volume 4 of the GBCS has assessed all our villages based on the requirements of the NPPF.
Exceptional circumstances should be applied site by site	Green Belt boundaries should only be altered in exceptional circumstances (NPPF, para 83). We consider that there are exceptional circumstances that warrant an

Issue	Guildford Borough Council Response
	amendment to our Green Belt boundary due to the level of need that we have and our limited capacity to meet it outside the Green Belt. As we moved through our spatial hierarchy we need to balance the benefits of doing so with the harm that this creates. There will reach a point where it will no longer be sustainable to provide more homes and we need to move to the next development option in the spatial hierarchy. We therefore do need to consider each site on its merits within this overall balancing act.
Green Belt should be protected / important countryside/meets purposes	The NPPF attaches great importance to the protection of the Green Belt and boundaries should only be altered in exceptional circumstances through the plan-making process. We consider there are exceptional circumstances however we have only proposed to remove land from the Green Belt that would not harm the main purposes of the Green Belt.
Have not demonstrated exceptional circumstances/Unmet housing need is not one / Green Belt and AONB can be reasons for not meeting need	We consider that exceptional circumstances exist across the borough. These are the requirement to allocate sufficient land for market and affordable housing and employment development, combined with the significant adverse consequences of not doing so.
Housing numbers too high / SHMA flawed /does not consider constraints	The housing requirement has been based on the OAN set out in the final West Surrey SHMA. The SHMA has been subject to extensive scrutiny and has been prepared by specialist consultants whose methodology has been tested at numerous examinations. We are confident that it is a robust study. The NPPF requires that we maximise opportunities to meet our full needs where this is sustainable to do so. Based on the evidence we have, we consider that we are able to meet our need in spite of constraints within our borough.
Detailed issues with SHMA	Comment has been responded to in the table for Appendix C: Evidence Base
Council has made concerted effort to accommodating its housing need	Comment noted.
Impact on wildlife /environment	We need to consider the environmental impact of our spatial strategy, policies and site allocations through the Sustainability Appraisal process. Our site allocations have also been influenced by environmental constraints. Any subsequent planning application will need to demonstrate how any adverse impacts on biodiversity are being mitigated.
Harm rural character /not consistent with NPPF to protect intrinsic character of countryside and supporting thriving communities	<p>Any proposals will need to demonstrate at planning application stage that they are of high quality design and in keeping with the character of the surrounding area. In response to this concern the 'Proposed Submission Local Plan: strategy and sites' includes a new policy on development in urban areas and inset villages.</p> <p>The 'Proposed Submission Local Plan: strategy and sites' now includes a policy which supersedes the former Local Plan 2003 R5 policy. This policy seeks to protect areas of open land within non-Green Belt areas that is of public value due to its amenity.</p>
Should not be identified as a Growth Hub / overemphasis on economic growth /	The 'Proposed Submission Local Plan: strategy and sites' is seeking to meet, not

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growth agenda	exceed, our employment needs.
Need to consider cross border development	The transport modelling that we have undertaken on our spatial strategy has tested the impact of growth arising outside our borough.
Need greater detail on conservation areas	The 'Proposed Submission Local Plan: strategy and sites' will not include a development management policy on Conservation Areas. Any proposal for development within a Conservation Area will be considered in accordance with our Local Plan 2003 policy until such time that this is completely superseded by the new Local Plan.
'small scale developments and main town centre uses' includes uses that are inappropriate in villages	Only small-scale development will not require the sequential test in rural areas. For Guildford this is 100 sq m. Given the scale of the development that is allowed, this is unlikely to enable the sorts of uses that are not appropriate in a rural setting.
Monitoring indicators only concerned with net addition e.g. quality design, smart working, income	The monitoring indicators that are set need to be measurable and linked to planning applications.
Rural economy includes uses such as agriculture, filming etc that don't require building	Comment noted. The 'Proposed Submission Local Plan: strategy and sites' will include a policy on the Rural Economy.
Homes should be built to design standards	The 'Proposed Submission Local Plan: strategy and sites' includes four strategic policies that deal with design.
Need to protect agricultural land	The NPPF requires that we seek to direct development away from Best and Most Versatile agricultural land. We have considered this as part of our Sustainability Appraisal process.
Local views being ignored /issues and options views/actions not taken forward/ goes against localism	The Consultation Statement will need to demonstrate how we have responded to the issues raised in previous consultations.
Safeguarding – all available land should be allocated in this plan period if needed	No longer applicable as the 'Proposed Submission Local Plan: strategy and sites' does not include safeguarded land.
New homes not affordable for local people / London's growth	Part of the uplift applied to our OAN is as a result of issues with affordability and seeking to increase supply of homes.
Safeguarded sites should only be considered after 2031 / review can happen any time / uncertainty/blight	No longer applicable as the 'Proposed Submission Local Plan: strategy and sites' does not include safeguarded land.
Para 4.11 should require a full not partial review	No longer applicable as the 'Proposed Submission Local Plan: strategy and sites' does not include safeguarded land.
Need to include DC policies along lines of RE policies in LP 2003	'Proposed Submission Local Plan: strategy and sites' is primarily strategic policies and site allocations. We have only included detailed development management policies where these are necessary in order to implement the strategic policy or where the 2003 policy is no longer effective due to the policies in the 'Proposed Submission Local Plan: strategy and sites'.
Safeguarded land should have its own policy with criteria for use	No longer applicable as the 'Proposed Submission Local Plan: strategy and sites': does not include safeguarded land.
Major previously developed sites out of place in this policy – should be separate	Comment noted. The 'Proposed Submission Local Plan: strategy and sites': no longer includes this policy as aspects of it are covered by other policies.
Major previously developed sites need to be controlled – intensification can impact	Development of these sites and the impact this may have on surrounding areas will

Issue	Guildford Borough Council Response
surrounding areas	be considered and controlled by other development management policies.
Major previously developed sites should remain washed over as NPPF allows redevelopment of PDL	National policy requires that land which it is unnecessary to keep permanently open should not be included in the Green Belt. If major previously developed sites are of sufficient scale and do not possess an open character, it is not considered necessary for them to remain within the Green Belt.
Safeguarded should be around urban areas as required by NPPF	No longer applicable as the 'Proposed Submission Local Plan: strategy and sites': does not include safeguarded land.
Should not have 20% buffer	Where there has been persistent under delivery of homes, the NPPF requires an additional 20% buffer in the first five years brought forward from later on in the plan period
Limited infilling of settlements within the Green Belt (not identified) should be supported by the Council in Policy 9 provided it helps the present and future economic, environmental and social sustainability of rural settlements (in accordance with NPPF para 89)	Comment noted.
Safeguarded does not offer 'flexibility in this plan period' as could not come forward following LP review	No longer applicable as the 'Proposed Submission Local Plan: strategy and sites' does not include safeguarded land.
More development in east than in west	<i>Our spatial strategy is based on sustainability considerations and not necessarily even distribution.</i> In spite of this, there is a relatively even distribution between the level of development planned in the east and the west.
Worplesdon parish/NW Guildford getting disproportionate amount of development (impact on traffic A320, A323, A322, Saltbox Road /SPA)	<i>Our spatial strategy is based on sustainability considerations and not necessarily even distribution. Having said that a number of sites are no longer being allocated in Worplesdon as a result of the new spatial strategy.</i>
Openness along A246/A3 corridor important /contributes to setting of AONB	We have a policy that protects the scenic quality and setting of the AONB. Any development proposals will need to demonstrate how they have mitigated impact on eth landscape.
Issues with the methodology of the Settlement hierarchy / settlement profiles	The Settlement Hierarchy was reviewed following feedback as part of the Joint Scrutiny Committee process. We consider that the Settlement Hierarchy is a robust yet proportionate piece of evidence base. Given the range of considerations that have informed the spatial strategy we do not consider it necessary to revise the Settlement Hierarchy. Its primary purpose is to better understand the range of services and facilities that are present in each village.
Must take account of AONB / boundary review	Comment noted. This is included in Policy P1 of the 'Proposed Submission Local Plan: strategy and sites'
Infrastructure cannot cope with level of development	The infrastructure needed to support the planned development is outlined in the Infrastructure Schedule in the 'Proposed Submission Local Plan: strategy and sites'.
No definition of main town centre uses	The 'Proposed Submission Local Plan: strategy and sites' will include a definition of this in the glossary.
Support commitment to improved broadband	Comment noted

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Contains no proposals to improve internet/mobile coverage/essential for businesses - Surrey County Council's Superfast scheme and BT's commercial roll-out areas have left some pockets of stranded residents	Whilst the Council supports improvements to broadband speeds across the borough, it has not able to affect delivery of upgrades
Should include settlement hierarchy in the Local Plan to help justify spatial strategy/ direct development to most sustainable settlements	The extent to which the Settlement Hierarchy has been used to direct development is outlined in the Housing delivery Topic Paper. It is not considered necessary to include the Settlement Hierarchy in the Local Plan as only those villages which are inset from the Green Belt will be able to accommodate more than limited infilling.
When considering sites bordered by large areas of common/heathland, due regard should be made to the National Risk Register. In particular the dangers of wildfires and the impacts they have on the local community. Mitigations such as managed low fuel load/ low level interfaces between the heathland and the development should be considered (Surrey Fire and Rescue Service)	Comment noted.
Development should not be focussed in urban areas	The urban areas are the most sustainable and therefore are at the top of our spatial hierarchy.
Development should be more evenly distributed across borough to help support communities and infrastructure	<i>Our spatial strategy is based on sustainability considerations and not necessarily even distribution. Our spatial strategy does however direct growth to the urban and village settlements. Insetting of certain villages will help enable some development to help maintain thriving communities. Limited infilling and rural exception sites will ensure that even washed over villages are able to accommodate some development.</i>
Development should be directed to brownfield first /urban areas	These spatial options are at the top of our hierarchy.
Development should be informed by assessment of surrounding heritage assets	We have taken account of heritage assets as part of considering site allocations. Proposals near heritage assets will need to demonstrate at planning application stage that they have mitigated against any adverse impacts.
Development should be located close to jobs and transport links	We have sought to create mixed and sustainable communities by seeking an element of employment provision at our strategic sites. We have also directed development to those places that are well served by public transport. Guildford Borough Council has published a Guildford Borough Transport Strategy 2016 that sets out how to mitigate the key transport impacts of proposed planned growth in our borough
Development should be built at higher densities	Whilst we will ensure that we make efficient use of land, we nevertheless need to ensure that we create high quality places that responds to the surrounding character.
Development should be land allocated for commercial/retail uses	The NPPF requires that we align our housing and economic strategies. It is

Issue	Guildford Borough Council Response
	important that we provide a mix of uses to minimise the need to travel.
University should be made to provide their student accommodation and the residences / better use of surface car parks	The University has undertaken a significant amount of building at its Manor Park campus, approximately 1,750 bedspaces to date. There is outline planning permission to build a total of 4,171 bedspaces at Manor Park as set out in the Manor Park Masterplan There are current planning applications for 200 and 953 new student bedspaces on the Manor Park campus.
Development should be focussed on larger sites – garden cities	We have allocated a number of strategic sites that can deliver a greater level of supporting infrastructure.
Make developers build unimplemented permissions	We can count all planning permissions where there is a reasonable chance that they will be delivered in our housing supply.
Development should be on Non-Green Belt land	We have sought to maximise sites in the countryside beyond the Green Belt where sustainable to do so ahead of Green Belt sites.
Development should be in town centre along river using car parks	We have sought to maximise sites within our town centre where sustainable to do so given flooding constraints.
Detailed issues with the GBCS	These comments have been responded to in the table for Appendix C: Evidence Base
Ash Green	
Ash Green should be listed as an identified village	Identified villages are washed over by the Green Belt. Ash Green was never in the Green Belt.
Areas of woodland within boundary should be protected or removed (might encourage felling)	Felling trees does not generally require planning permission. Open space of public value is protected by the NPPF. The Council is currently producing an updated Open Space, Sports and Recreation study that will identify land of public value within villages, which can include areas of woodland. This land will be protected in line with the NPPF. Where areas of woodland are assessed and not considered to have public value, there is no basis for protection. Where trees have significant amenity value and may be under threat (e.g. from development), they may be protected through Tree Preservation Orders.
Development should be proportionate to the size of the village and density and mix are in character with the area, nearby developments should be taken into consideration	<i>Our spatial strategy is based on sustainability considerations and our spatial hierarchy rather a proportionate growth approach.</i>
Should be considered in Policy 11 as was never washed over/inset	The 'Proposed Submission Local Plan: strategy and sites'; strategy and sites' proposes that Ash Green is a fully inset village, separate to the Ash and Tongham urban area.
Has limited services and facilities	There will be opportunities to improve access to services and facilities through the allocation of the strategic site around Ash and Tongham. Once built there will be better connections to the facilities within the urban area.
Concern regarding availability of SANG	There is sufficient SANG to deliver the level of growth identified in the 'Proposed Submission Local Plan: strategy and sites'

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Chilworth	
Will harm views from the south side of the Downs at The Chancies / setting of Guildford	Any development proposals will need to consider impact of the landscape.
Limited services and facilities	Comment no longer considered relevant as the 'Proposed Submission Local Plan: strategy and sites' does not include any large site allocations in this village. Any development coming forward here is therefore likely to be proportionate to the size of the village and will need to be in accordance with all remaining Local Plan policies.
Should not include Old Manor Farm due to AONB/landscape and open character	There are other local plan policies which prevent inappropriate development that would have an adverse impact on the AONB, landscape or character of the area.
Should not include Tillingbourne Junior School and playing fields – should be protected	Policy I4 of the 'Proposed Submission Local Plan: strategy and sites' resists against the loss of community facilities and playing fields
Should not include land to south and east of the A248 as different character to rest of village and impact on AONB/landscape	There are other local plan policies which prevent inappropriate development that would have an adverse impact on the AONB, landscape or character of the area.
East Clandon	
Support appropriate infilling in the village – conservation area will ensure good quality design	Support noted
Boundary should be extended northwards in accordance with Volume III	As the village extends northwards into the countryside, the built form becomes much looser and rural in character. Accordingly it is not considered appropriate to define this part of the village and any planning applications for limited infilling will need to be assessed on its own merits.
Object to settlement boundary because very limited services and facilities other than a pub/ will harm conservation area/ character/ impact on AONB/AGLV / village already compact	The NPPF allows limited infilling in villages. Any proposals will be determined in accordance with other development management policies which consider issues such as conservation and landscape.
Effingham	
Support provision of smaller and affordable homes to create a balanced community	We have a policy which seeks to provide a mix of homes.
Support sheltered/warden assisted accommodation for elderly	We have a policy which seeks to provide a mix of homes.
Support development accompanied by infrastructure/off road parking	We have a policy on infrastructure provision.
Makes an important contribution to openness of the Green Belt	This is not supported by Volume IV of the GBCS
Oppose to inseting Effingham due to Conservation Area	Any applications would still need to be in accordance with our Local Plan policy on Conservation Areas. The Green Belt designation should only wash over land that contributes to the openness of the Green Belt.
Expansion is inconsistent with settlement hierarchy (unsuitable for substantial growth)/ not proportionate to size of village	Comments are no longer considered relevant as the 'Proposed Submission Local Plan: strategy and sites' does not include a site allocation in this village. Any development coming forward here is therefore likely to be proportionate to the size of the village and will need to be in accordance with all remaining Local Plan
Would impact on historical setting on conservation area	
Effingham Lodge Farm does not follow defensible features (middle of a field)	

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Lack of services and facilities to support growth (medical facilities, train station facilities, water supply, drainage, sewage, sports clubs, public transport)	policies.
Browns Field important for setting of conservation area/amenity space/ not identified as PDA/proposed to be Local Green Space	
Local road network already congested (Effingham Common Road/Lower Road/The Street/A246)	
Need to take account of proposed developments in Mole Valley –may lead to merging of settlements	
Oppose Effingham Common land being used for car parking	
Oppose relocation of school and associated housing	
Concern regarding designating Effingham Common as SANG	
Without Effingham Common SANG the development cannot mitigate impact on SPA	
Impact rural character of the village	
Would harm wildlife	
Increase air pollution	
Impact on existing residents	
Flooding issues (not investigated in SWMP) – surface water, springs, ground water, major aquifer high vulnerability to surface pollution)	
Local Plan inaccurately states that site is not within 5km of SPA – part of it is	
Effect on SSSI – no EIA undertaken	
Contrary to Landscape Character Assessment	
School can continue to rent KGV fields – important funding source for them, impact on loss of funding	
Subsidence risk building on clay/impacts use of SUDS	
Prevent brownfield/infill sites from coming forward	
Would increase crime	
Lack of jobs in area	
Effingham Lodge Farm serves as a wildlife corridor	
Contrary to what agreed with parish council	
School not needed/supported by SCC/alternative sites should be considered in Mole Vally	
Number of homes not needed by parish	
Home Farm pitches could be delivered through Rural exception housing / not agreed with Parish Council	The 'Proposed Submission Local Plan: strategy and sites' allocates six rural exception pitches at Home Farm, Effingham, and does not propose amendments to

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	the Green Belt in this area.
Existing boundary follows defensible features (residential curtilage bordering agricultural land) / new boundaries not defensible (fencelines)	We should be seeking to define features which, in accordance with the NPPF, are physical features that are readily recognisable and likely to be permanent. On the whole the Green Belt boundary follows features such as tree belts, woodland and roads.
Boundary should not include North of A246/centre of village is open and should remain washed over	This is not supported by the findings of the GBCS
Boundary should not include Browns Field	Browns Lane forms a continuous defensible boundary. There is a policy that resists against the loss of community facilities and playing fields.
Boundary should not include the allotments	The hedgerow adjacent to the allotments forms an easily recognisable and continuous boundary with open Green Belt to the west. The allotments are protected from development under other policies.
Boundary should not include the former school field on Church Street	This land is within the built up area of the village and does not contribute towards the openness of the Green Belt
Boundary should not include Effingham Lodge farm	This site is no longer allocated in the 'Proposed Submission Local Plan: strategy and sites'
Boundary should not include St Lawrence Primary School	The GBCS does not recommend that this be inset. This land was only included in the proposed inset in the draft Local Plan as a result of the adjacent proposed site allocation at Effingham Lodge Farm. This site is no longer allocated in the 'Proposed Submission Local Plan: strategy and sites'.
Boundary should include:developed areas of St Lawrence Primary School	Lower Road forms a strong defensible boundary with open Green Belt to the north.
Boundary should include:Developed areas of the Howard of Effingham School	The draft Local Plan included current Howard of Effingham within the inset. It will continue to do so in the 'Proposed Submission Local Plan: strategy and sites'
Boundary should include:The housing site at The Grove on the A246	The draft Local Plan included the housing site at the Grove within the inset. It will continue to do so in the 'Proposed Submission Local Plan: strategy and sites'
Fairlands	
Support growth in villages around Guildford town	Comment noted.
Traveller sites concentrated in this area / Disproportionate amount of development in Worplesdon /Development should be more evenly distributed	The 'Proposed Submission Local Plan: strategy and sites' proposes to meet the need for Traveller accommodation across the borough, including the provision of Traveller pitches on strategic development sites.
Housing should meet local need – affordable/retirement	<i>Comments no longer considered relevant as the 'Proposed Submission Local Plan: strategy and sites' does not include a site allocation in this village. Any development coming forward here is therefore likely to be proportionate to the size of the village and will need to be in accordance with all remaining Local Plan policies.</i>
Development will harm rural character	
Green Belt important to maintaining separation from Ash and Normandy / Will join Fairlands with Guildford/surrounding villages	
Roads narrow/congested (A323/A322/A31/A320/A3/Worplesdon Roads/Dennis Roundabout)	
Only one access road	
Services can't cope (GPs/schools/hospitals/electricity/water)	
Flooding/drainage/sewage issues	

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Impact on wildlife / SPA/SSSI	
Gomshall	
Support that remains washed over	Comment noted
Should include land on the north side of Highview	This land is open and therefore not considered to form part of the village core.
East and West Horsley	
Support Bell and Colville site (brownfield)	Comment noted
Support BT site for housing	Comment noted
Support Thatchers	Comment noted
Need smaller homes to have greater mix of community	Local Plan Policy H1 seeks a mix of housing sizes appropriate to the site size, characteristics and location. The SHMA found a need for predominantly one and two bedroom affordable houses and two and three bedroom market housing and the supporting text of the policy sets this out.
Support more affordable homes	Comment noted
Development must be supported by additional infrastructure that could improve the village	The infrastructure needed to support the planned development is outlined in the Infrastructure Schedule in the 'Proposed Submission Local Plan: strategy and sites'
Support conclusions of inseting	Comment noted
Expansions planned are inconsistent with settlement hierarchy /not proportionate in scale to size of village (as required by Policy 9)	The Settlement Hierarchy assesses East Horsley as a Rural Service Centre and West Horsley as a Large village. Directing growth to sustainable locations such as this is consistent with the NPPF. The spatial hierarchy is based on sustainability and is not necessarily going to be proportionate due to the different constraints that exist across the borough.
Development will harm wildlife/SSSI (Sheeples)/SPA	The sustainability Appraisal process considers the effect that our policies and sites may have on environmental factors. The sites are not located on any statutory designations and the mitigation that will be required in response to any biodiversity on site will be considered in more detail at planning application stage.
Development will merge villages	East and West Horsley (north) is still considered to remain visually and physically separate to West Horsely (south). East and West Horsley (north) are currently physically joined.
No proposals to expand shopping area/car parking – already stretched in East Horsley	A council-owned car park at the back of Station Parade acts as an overflow for when the on-street parking is full. This car park is rarely full.
Development not in keeping with character / density too high	Any proposals will need to demonstrate at planning application stage that they are of high quality design and in keeping with the character of the surrounding area. In response to this concern the 'Proposed Submission Local Plan: strategy and sites' includes a new policy (Policy D4) on development in urban areas and inset villages.
Impact tourism/leisure/recreation (cyclists, walkers)	The development of these sites is unlikely to impact on any of the areas significant tourist walking or cycling routes.
Impact on house values	This is not a material planning consideration.
Scale of homes not needed in village (as evidenced in parish survey/economic	The need for homes is assessed across the housing market area and borough.

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strategy)	Given factors such as constraints and the availability of suitable sites, this means certain location will need to accommodate more development than others.
Very few job opportunities in east of borough	The 'Proposed Submission Local Plan: strategy and sites': strategy and sites' seeks to meet both our housing and our employment needs. Needs are assessed across the borough rather than at a local scale.
Village contributes to openness of Green Belt	This is not supported by Volume IV of the GBCS.
<p>Development sites inappropriate in Horsleys because:</p> <ul style="list-style-type: none"> • Lack of capacity of services and facilities to support growth (schools/GPs/shops/sewage/water supply/library) • Local road network already congested/narrow (the Drift/A246/A3/East Lane/Ockham Road North and South/Ripley Lane/Forest Road/B2039/lane leading to Waterloo Farm/Long Reach/especially during school drop off) / narrow pavements • Infrastructure can't cope • Development would ruin countryside • West Horsley specifically lacks services (one shop, no post office, a primary school, a shared medical facility, limited bus service) • Train station/parking/network already over capacity • Lack of public transport • New Wisley residents likely to look towards Horsley for services • Suffers from flooding (including roads Silkmore Lane, Green Lane, Ripley Lane, The Street, Ockham Road North, Guilehill Lane)/drainage issues • Would impact on AONB/AGLV / aspiration to extend this to cover Hatchlands Park • Would harm character of area/conservation area/listed buildings /contrary to policy 12 • Will impact on the camping and caravanning club • Loss of hotel when DLP states elsewhere that hotels are needed • Traveller pitch would harm setting of conservation area/listed buildings – contrary to Policy 12 • Lead to loss of Benswood / valuable amenity 	<p>These comments are considered to relate to the proposed sites at East and West Horsley. These comments have been responded to in Planning for Sites</p>
West Horsley should not be classed as part of East Horsley / West Horsley is one village	We recognise that East and West Horsely are two villages however given that East Horsely is contiguous with the northern part of West Horsley, the inset boundary surrounds them both.
East Horsley should not be designated a rural district centre	It is already designated as a District Centre in Guildford Local Plan 2003. This plan

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	would continue that designation.
East Horsley not appropriate for town centre uses	A settlement of this size needs to have some services to be sustainable. If not, people would need to travel to do everything, including buying food, visiting the pub, getting a takeaway, etc.
East Horsley - inaccurately states there is a large supermarket here (Budgens exempt from Sunday trading hours)	Agreed that the Budgens supermarket is under the "small" convenience threshold for Sunday Trading and is not a large supermarket
Manor Farm should be site of new school	This site is not available for a school
Object to insetting of:Horsley Sports Club – this will lead to development pressure on important facility	The woodland edge is the first continuous defensible boundary. There is a policy that resists against the loss of community facilities and playing fields.
Object to insetting of:paddock at the end of Norrels Drive and High Park Avenue – wildlife habitat and access road narrow	The woodland edge is the first defensible boundary. There are other policies that seek to protect biodiversity and ensure safe access
Object to insetting of:Horsley Towers due to historic significance and impact on character	The boundary was extended in the Draft Local Plan from that recommended in the GBCS in order to help create a more easily recognisable defensible boundary. Whilst this site would be protected from inappropriate development given its Conservation Area status, it is considered that, on balance, the open character of this area contributes to the openness of the Green Belt. This area is no longer included in the 'Proposed Submission Local Plan: strategy and sites'.
Object to insetting of:Thatcher's Hotel due to historic significance and impact on character	There are other policies that protect heritage and character.
Object to insetting of:community playing fields in Kingston Meadow	The woodland edge is the first continuous defensible boundary. There is a policy that resists against the loss of community facilities and playing fields.
Object to insetting of:BT exchange – impact on conservation area and listed buildings	The site is within the built up area of the village. There are other policies that protect the setting of conservation areas and listed buildings.
Object to insetting of:Pincott Farm	The hedgerows to the north of Pincott Farm form a strong defensible boundary. This land does not contribute towards the openness of the Green Belt and should therefore be included within the inset.
Insetting should include land around Waterloo farm and up to Green Lane	The woodland edge identified in the GBCS is the first continuous defensible boundary. To extend the Green Belt boundary here would lead to encroachment of the countryside.
Insetting should include Foxbury, Epsom road, West Horsley	The tree belt to the east of Cranmore School is a strong and defensible boundary. To extend the Green Belt boundary here would lead to encroachment of the countryside.
Insetting should include Heathway	Heathway forms a strong defensible boundary and creates a clear eastern edge to the village with open countryside beyond. To extend the Green Belt boundary here would lead to encroachment of the countryside.
Insetting should include Land below A246. GBCS inaccurately described the north as woodland whereas it is south	The A246 Epsom Road forms a strong defensible boundary. However there may be appropriate opportunities for limited infilling south of the

Issue	Guildford Borough Council Response
	A246 which is considered to form part of the village. An identified settlement boundary has been defined for this area.
Insetting should include (The boundary should include) the land to the north of Fangate Manor Farm	It is considered that the tree belt to the west of Fangate Manor Farm would form a strong defensible boundary and create a clear western edge to the village with open countryside beyond. The 'Proposed Submission Local Plan: strategy and sites' has been amended to reflect this.
Jacobs Well	
Green Belt surrounding village important to prevent merging of settlements	<i>The 'Proposed Submission Local Plan: strategy and sites' does not include a site allocation in this village. Any development coming forward here is therefore likely to be proportionate to the size of the village and will need to be in accordance with all remaining Local Plan policies.</i>
Harm wildlife	
Flooding issues	
Harm rural character	
Normandy	
GB should be protected / serves purposes	This comment is addressed in the table for Policy 10
Should build retirement homes	<i>The 'Proposed Submission Local Plan: strategy and sites': strategy and sites identifies sufficient sites to meet our need for care homes, one of which is part of the Normandy and Flexford site.</i>
Oppose crematorium – prefer cemetery	<i>The 'Proposed Submission Local Plan: strategy and sites' identifies a site for a cemetery not a crematorium.</i>
Consultation event poorly advertised	The Statement of Community Engagement consultation report details the publicity campaign
Limited services and facilities in Normandy (no shops/PO/pub)	These comments are considered to relate to the proposed safeguarded site at Normandy and Flexford. These comments have been responded to in Planning for Sites
Services can't cope (primary school/GP/sewage/electricity)	
Should not be inset because it lacks conservation area status	
Development will harm character / countryside / footpaths, access to countryside	
Impact on local tourism	
Limited parking at Wanborough station	
Local road network already congested/narrow (A323/Westwood Lane/Glaziers Lane/A31/Cobbett Hill Road/Wanborough Hill)	
Increase in noise/air pollution	
Flooding/drainage issues	
lacks cycle ways/public transport	
Harm to wildlife SPA	
Disproportionate	
Merge Ash and Guildford	
Should not assess Normandy and Flexford as one	
Merge two villages	
train station too far away / lack pavement/parking	
Does contribute to openness of GB	

Issue	Guildford Borough Council Response
Loss of agricultural land	
Will harm rural economy (farming)	
Safeguarding leads to blight	
Change in traveller policy	
Crematorium/cemetery inappropriate near primary school	
Score for 'wider employment market' when other villages don't	
Parish council has enhanced beneficial use of GB in accordance with NPPF 81	
Impact on listed buildings and Romano British Temple Exhibit 1	
Impact on AGLV/soon to be AONB	
Inset boundary should include all permanent properties down Green Lane East - old tree line to the West of Northrepps Cottage which is natural, permanent and defensible	The access road off Green Lane East is a preferable Green Belt boundary as it is continuous and easily recognisable. The density here is also lower and the built form of development is looser. Opportunities for limited infilling may still be appropriate and any planning applications will be assessed on their own merits.
Inset boundary should include Lynwood Nurseries	This site extends into open countryside and would join up with the ribbon development located off Beech Lane. This would impact on the openness of the Green Belt.
Inset boundary should not permanently allocate a temporary traveller permission	It is not a given that temporary Traveller sites become permanent through the new Local Plan. However, in order to meet the identified need, the 'Proposed Submission Local Plan: strategy and sites' does propose some temporary permissions are inset from the Green Belt and become permanent. The need is also proposed to be met in part through provision on strategic development sites and direct council provision on its own land.
Green Lane East traveller pitch not defensible /permanent	This site is no longer a site allocation in the 'Proposed Submission Local Plan: strategy and sites'.
Ripley	
South eastern boundary should be in accordance with GBCS	The 'Proposed Submission Local Plan: strategy and sites' identifies the inset boundary as recommended by the GBCS.
Consider the village is open (esp northern, eastern and southern parts)	This is not supported by the assessment undertaken in Volume IV of the GBCS
Impact on rural character	Any proposals will need to demonstrate at planning application stage that they are of high quality design and in keeping with the character of the surrounding area. In response to this concern the 'Proposed Submission Local Plan: strategy and sites' includes a new policy on development in urban areas and inset villages.
Roads narrow/congested (Newark Lane/A3/Ripley roundabout/High Street)	Any development sites in Ripley are likely to be proportionate to the size of the village and will need to be in accordance with all Local Plan policies.
Infrastructure cannot cope (schools, health facilities, drainage)	Any development sites in Ripley are likely to be proportionate to the size of the village and will need to be in accordance with all remaining Local Plan policies.
Lack of parking spaces (Ripley High Street/Clandon station)	Any development sites in Ripley are likely to be proportionate to the size of the village and will need to be in accordance with all remaining Local Plan policies.

Issue	Guildford Borough Council Response
Flooding issues	The Green Belt boundary must follow defensible boundaries. There are other policies which would prevent inappropriate development on community facilities.
Lacks shops	
Should not include village green	
Should not include graveyard	
The boundary should be extended behind the Talbot Inn in accordance with the findings of the GBCS	The 'Proposed Submission Local Plan: strategy and sites' extends the boundary to the woodland edge as recommended by the GBCS
Send/ Send Marsh/Burntcommon	
Support insetting of Send and boundary proposed	Comment noted
Character of Send does allow for some development	Comment noted
Development planned/ inset boundary is not proportionate / not consistent with settlement hierarchy	The spatial hierarchy is based on sustainability and is not necessarily going to be proportionate due to the different constraints that exist across the borough. The inset boundary is based in part on defensible boundaries. Depending on the village some of these may be located beyond the built up area of the current village. The settlement hierarchy is only one mechanism to assess the suitability of that village for growth. Send and Send Marsh/Burntcommon are categorised as large villages near the top of the hierarchy.
Send and Send Marsh/Burntcommon should not be identified separately	They are identified separately in the 'Proposed Submission Local Plan: strategy and sites' because they each have their own inset boundary. This does not imply that both areas do not necessarily have close functional links.
Settlement hierarchy incorrectly counts GP in both Send and Send Marsh but not Ripley / infant/primary school also in centre	Feedback from the parish council was that the GP surgery was exactly in the middle and could not be attributed to only one village. Given both villages are able to access this service equally it is reasonable that it is counted in both. The Junior school is within the built up area of Send however Send Marsh score highly too as a result of having one close by.
Playing field should not be included as may be developed / important facility for children/contrary to NPPF	There is a policy that resists against the loss of community facilities and playing fields
GBC owned nature reserve and one Millennium Green Space should be designated a Local Green Space	Local Green Space is to be designated through the forthcoming Green and Blue Infrastructure SPD, but support for this site is noted.
Insetting and boundary drawn is contrary to NPPF	Paragraph 86 states that unless a village makes an important contribution to the openness of the Green Belt it should not be included within the Green Belt. Volume 4 of the GBCS has assessed all our villages based on the requirements of the NPPF.
Lack of employment opportunities / Send business centre not allocated as a strategic site in Policy 13	Send Business Centre has been identified as a Locally Significant Employment Site in new Policy E1: Sustainable Employment.
Object to traveller pitch / loss of garages / garages in use / loss of amenity contrary to PTTS	No longer applicable as this site is no longer included as a site allocation in the 'Proposed Submission Local Plan: strategy and sites'.
Surrey has the greatest population density	There will always be variation in the level of population in different areas of the country based on a range of factors. We are required to meet our development

Issue	Guildford Borough Council Response
	needs where consistent with the NPPF.
No environmental assessment carried out	The Sustainability Appraisal assesses the sustainability of our policies and sites. This incorporates Strategic Environmental Assessment (SEA) which assesses environmental aspects of sustainability.
Local road network already congested / safety issues / difficulty crossing (Tannery Lane/ Ripley High Street/Burntcommon roundabout/Send Barns Lane /Send Road /Potters Lane/Portsmouth Road) / seen during recent closure of the Newark Priory Bridge / dangerous to cross road	These comments are considered to relate to the proposed sites at Send, Send Marsh/Burntcommon. These comments have been responded to in Planning for Sites
lack of public transport/cycleways	These comments are considered to relate to the proposed sites at Send, Send Marsh/Burntcommon. These comments have been responded to in Planning for Sites
Limited parking in village / Clandon station	
Overcrowding on train services	
Increase in air/noise pollution	
Services can't cope (schools/GPs/gas/electricity/ water supply/telecoms/sewage/ hospital) / Lack of infrastructure planned to support growth	
Loss of agricultural land	
Development will harm heritage/rural character of area	
Contrary to LCA	
Already experienced development in recent years (63 at Old Tannery/23 at Vision Engineering) / developments not counted	
Flooding issues	
Harm wildlife/SSSI/SNCI	
Harm River Wey navigation/contrary to Policy 19/NPPF heritage assets	
Contamination issues	
Will lead to loss of recreational land (footpaths/bridleways)	
Will lead to merging of send with Guildford/Woking/Send Marsh/Send/Ripley	
Shalford	
Support inset – sustainable location for development	Comment noted
Support small infill developments	Comment noted
Inset not suitable because no need for more development in Shalford / other large developments planned	The need for homes is assessed across the housing market area and borough. Given factors such as constraints and the availability of suitable sites, this means certain location will need to accommodate more development than others.
Inset not suitable because Shalford and Chilworth should not be inset alongside all other villages in Tillingbourne Valley – role in AONB	The Green Belt is not a landscape designation. The AONB policy will continue to protect this area from inappropriate development.
Inset not suitable as development will cause harm to wildlife	The land is not subject to any statutory designations. The impact on biodiversity will be considered in more detail at planning application stage.
Inset not suitable as local roads already congested / Limited opportunities for pedestrians/cyclists	Guildford Borough Council has published a Guildford Borough Transport Strategy 2016 that sets out how to mitigate the key transport impacts of proposed planned growth in our borough

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	Please also refer to the table for Appendix C "Infrastructure Schedule" .
Inset not suitable as services and facilities already at capacity (schools, GP)	An Infrastructure Schedule in the draft Local Plan will identify new and improvements to existing infrastructure to support the planned development
Inset not suitable as will merge Chilworth and Shalford	Shalford and Chilworth are considered to remain visually and physically separate.
Inset boundary should only include developed parts of village / Upper Village Hall, tennis courts and bowling green	The boundary must follow defensible features which means that may need to extend beyond the built up parts of the village.
Change in boundary since meeting with Shalford PC	The boundary for Shalford follows that recommended by the GBCS. The parish council were shown a map that had not been finalised prior to consultation.
Inset not suitable as it is contrary to Landscape Character Assessment	The Landscape Character Assessment does not imply the need to 'freeze' the landscape. Instead it will guide the direction of any future change or evolution through development or management, by indicating sensitivities that should be considered, and providing the most positive opportunities for change and minimising negative impact.
South of Kings Road very different in character to north / should remain washed over	The character may be different however the process of inseting is about contribution to the openness of the Green Belt.
Inset not suitable as scores similar to Albury yet Albury remaining washed over	Albury exhibits more of an open character and has incomplete defensible boundaries. This is not applicable to Shalford.
Land behind bowling green, tennis courts and village hall (SHLAA site): <ul style="list-style-type: none"> • Designated AGLV / contrary to Policy 8/NPPF/has similar characteristics to AONB • Not deliverable (access crosses common land and includes a public footpath) • land is elevated and visible from common/village green / contributes to open character of village Lane lacks pavement / narrow /congested due to parking	The 'Proposed Submission Local Plan: strategy and sites' now includes a policy which supersedes the former Local Plan 2003 R5 policy. This policy identifies open space within non-Green Belt areas that is of public value due to its amenity and/or sports and recreation value and protects it in line with the NPPF. The 'Proposed Submission Local Plan: strategy and sites' will designate this land as Open Space on the Policies Map.
<ul style="list-style-type: none"> • Flooding issues / small stream flowed from this elevated land into the village pond via a drainage pipe 	Proposed site allocations are considered in accordance with the Strategic Flood Risk Assessment and flood risk sequential test.
Density too high for surrounding area	The number of homes is indicative. The exact number of homes will be considered

Issue	Guildford Borough Council Response
	at planning application stage. This will take account of the surrounding character of the area
<p>Boundary should exclude land behind the bowling green, tennis courts, village hall and houses on Kings Road in Christmas Hill because:</p> <ul style="list-style-type: none"> • the proposed boundary is a hedgerow on private land • this part of the village is elevated and contributes to the open character of the village <p>designated AGLV</p>	A mature hedgerow is considered to constitute a defensible boundary. In order to include land within the Green Belt, the NPPF states that the land should contribute towards the openness of the Green Belt, rather than the village. There are other policies that will prevent inappropriate development due to impact on landscape, character or amenity.
<p>Should not include common land:</p> <ul style="list-style-type: none"> • land adjacent to Horsham Road • triangle of land opposite Snooty's Groceries • triangle of land at Chinthurst Lane 	The boundary must follow defensible features rather than land designations. There are other policies that will prevent inappropriate development.
<ul style="list-style-type: none"> • The proposed boundary at Chinthurst Lane across the common is not as defensible as the previous boundary 	The previous boundary was not a continuous defensible boundary, for example it followed the backs of properties and cut between two tennis courts. These are not appropriate Green Belt boundaries.
Boundary should exclude the cemetery and surrounding land as it is common land and AGLV	There are other policies that protect against the loss of community facilities and prevent inappropriate development due to impact on landscape.
Shere	
Support that remains washed over	Comments noted.
West Clandon	
Important to enable limited infilling in washed over settlements in accordance with NPPF para 89	Comment noted. 'The 'Proposed Submission Local Plan: strategy and sites' includes a policy that enables limited infilling in washed over villages.
Village is sustainable/can contribute to housing need and should be inset / in accordance with settlement hierarchy	This is not supported by the findings of the GBCS.
GBCS assesses whole area as medium density development but then recommends it remains in GB due to low density	The GBCS assesses West Clandon as having pockets of medium and low density. It is assessed to have frequent visual connections between open areas of land within and outside of the village and incomplete defensible boundaries. For these reasons it is recommended to remain washed over by the Green Belt.
<p>chool not suitable because:</p> <ul style="list-style-type: none"> • Not needed by Clandon residents • Trains/roads already full / limited bus • Not proportionate to size of village • Does not have the supporting infrastructure • Flooding issues • Not appropriate given open character of village (Vol IV GBCS) • Access dangerous <p>Narrow/lack of pavements</p>	Comments no longer considered relevant as the 'Proposed Submission Local Plan: strategy and sites' does not include a site allocation in this village. Any development coming forward here is therefore likely to be proportionate to the size of the village and will need to be in accordance with all remaining Local Plan policies.

Issue	Guildford Borough Council Response
<ul style="list-style-type: none"> If school is required should remain in Green Belt 	Comments no longer considered relevant as the 'Proposed Submission Local Plan: strategy and sites' does not include a site allocation in this village. Any development coming forward here is therefore likely to be proportionate to the size of the village and will need to be in accordance with all remaining Local Plan policies. The identified boundary has been extended in the 'Proposed Submission Local Plan: strategy and sites'.
Boundary too tight and should be extended and should include all parts of the village shown as medium density development in the GBCS	
Wood Street Village	
Development will: <ul style="list-style-type: none"> Harm character Local road network already congested (Salt Box Road, Aldershot Road, Worplesdon Road, Park Barn, Perry Hill & Rydes Hill) Lead to increased flooding Services can't cope Will impact local businesses which are included in boundary Should not include SNCI/common land	<i>The 'Proposed Submission Local Plan: strategy and sites' does not include a site allocation in this village. Any development coming forward here is therefore likely to be proportionate to the size of the village and will need to be in accordance with all remaining Local Plan policies.</i>
Major previously developed sites	
Guildford University of Law	
Support inseting of site – will help the University to better meet its future needs	Comment noted
Site does not contribute to Purpose 2 (well screened) or Purpose 4 (whilst in conservation area with Grade II listed building there is other policy/legislation which will preserve this). Insetting will enable it to provide on site student accommodation	Comment noted
Site should not be inset: <ul style="list-style-type: none"> Located in AONB/AGLV Oldest building covered by a conservation order / building should be preserved Site's grounds are open / development should be restricted to the current footprint Impact on St Catherine's/River Wey conservation area and setting of St Catherine's scheduled Ancient Monument	This is not supported by the assessment undertaken in Volume V of the GBCS. Any development will need to be in accordance with Local Plan policies.
Henley Business Park	
Inset based on extant planning permission – implies granted contrary to policy	The permission granted was on the basis of the development that was previously on site.
Impact on SPA	Any development will need to be in accordance with remaining Local Plan policies.
Should be used for a care home instead	This site is a strategic employment site and not considered suitable for a care home.
Mount Browne	
Site should not be inset: <ul style="list-style-type: none"> Located in AONB 	This is not supported by the assessment undertaken in Volume V of the GBCS. Any development <i>will need to be in accordance with all remaining Local Plan policies.</i>

Issue	Guildford Borough Council Response
<ul style="list-style-type: none"> Site contributes to openness Impact on St Catherine's/River Wey conservation area and setting of St Catherine's scheduled Ancient Monument	
Peasmarsh Industrial Estate	
Support inseting as site does not contribute to GB	Comment noted
Partial/complete redevelopment could lead to environmental improvements of River Wey Navigation Canal, adjacent to National Trust land and the SSSI.	Comment noted. We would support any proposals that can seek to deliver associated benefits
Pirbright Institute	
Support inseting	Comment noted
The boundary should not follow existing footprint of building but rather defensible boundaries	Comment noted. The inset boundary for all major previously developed sites have been extended where appropriate to follow defensible features rather than existing built form.
The boundary should be extended to incorporate the western field	The western field is located on the opposite side to a thick strip of woodland. An extension over a clear defensible boundary such as this is not considered appropriate.
RHS Wisley	
Is not a developed site – should remain washed over	Comment noted
The boundary should be extended to be consistent with the masterplan	The 'Proposed Submission Local Plan: strategy and sites' no longer identifies boundaries for major previously developed sites that are remaining washed over. The NPPF enables all previously developed sites to be redeveloped where this would not harm the openness of the Green Belt. There is therefore no need to identify a boundary.

Comments on Policy 10: Green Belt and the countryside

Issue	Guildford Borough Council Response
Support policy	Comment noted
Support new Green Belt	Comment noted
Policy ensures that existing leisure and visitor facilities can continue to contribute to the local economy	Comment noted
Support building on the Green Belt to deliver more affordable housing	Comment noted
Support building on Blackwell Farm	Comment noted
Support the development and diversification of agricultural and other land-based rural businesses	Comment noted. The 'Proposed Submission Local Plan: strategy and sites' includes a Rural Economy policy.
GB review ensures the wider GB purposes are maintained	Comment noted
NPPF states reviews must be done through the local plan process	Comment noted
Sites chosen that can deliver early in plan period	Comment noted. The 'Proposed Submission Local Plan: strategy and sites' includes a mix of sites including those that can deliver in first five years.

Issue	Guildford Borough Council Response
Need mechanism for future reviews for longer term needs	The 'Proposed Submission Local Plan: strategy and sites' does not identify safeguarded land for longer term needs. A commitment to ongoing joint working between Guildford, Waverley and Woking to address future unmet needs is demonstrated through the agreed Statement of Common Ground.
Approach consistent with NPPF and evidence base	Comment noted
Policy enables positive plan for future needs	Comment noted
Green Belt needs to be developed in a sustainable and sensible way/have defensible boundaries	Comment noted
Additional land should be allocated for development and removed from the Green Belt west of Worplesdon	The new spatial strategy seeks where possible to avoid highly sensitive Green Belt land.
Site allocations have been identified on basis of environmental constraints mapping and potential to provide sustainable development instead of on the analysis of green belt purposes – this should be more clear	Whilst the new spatial strategy is based primarily on Green Belt sensitivity, the potential development areas in the GBCS were identified on the basis of environmental capacity. The spatial hierarchy that has been used to inform our strategy is based on sustainability.
Should make clear that inset boundary includes land up to River Wey	The inset boundary follows the River Wey/ tree belt following the River Wey.
CBGB should have same weight as Green Belt	Green Belt is a national designation. Countryside cannot carry the same weight however the Proposed Submission Local Plan does seek to extend the Green Belt around Ash Green.
New Green Belt should be extended to surround Ash Green (instead of area of separation)	Comment noted. The 'Proposed Submission Local Plan: strategy and sites' seeks to do this.
Oppose new green belt for Ash & Tongham	We consider that there is sufficient justification to extend the Green Belt in this area. This land scores highly in Green Belt purposes, prevents coalescence between Ash Green and the Ash and Tongham urban area and helps to achieve sustainable development.
Question new Green Belt in West and loss in the East	We consider that there are exceptional circumstances which justify amending Green Belt boundaries. We have used our spatial hierarchy to direct development towards those areas that are the most sustainable. Countryside beyond the Green Belt is higher in the hierarchy and we have sought to maximise sustainable development opportunities here prior to considering Green Belt release elsewhere.
New GB prevents coalescence yet plan results in coalescence elsewhere / Normandy and Flexford should be treated as two separate villages	We have sought to minimise the extent to which site allocations may lead to coalescence of neighbouring settlements. This includes a green buffer at Gosden Hill to ensure that the extension to the site to deliver the secondary school does not lead to merging with send Marsh/Burntcommon. The only site that will lead to coalescence is the site allocation between Normandy and Flexford which is highly sensitive Green Belt but allocated on the basis that it will provide a secondary school to support development in the west which is close to a train station. This level of development will also help deliver further services and facilities that this area has lost in recent years.
Ash & Tongham land parcel K3 does not meet the five purposes of the Green Belt	We acknowledge that this land parcel does not meet all five purposes (GBCS

Issue	Guildford Borough Council Response
and should not be designated as such.	Volume II Addendum concludes it meets two of the five purposes). We still consider it appropriate for Green belt boundaries to be amended to include this land and the remainder of land parcel K5 not identified as a potential development area. The justification for this is discussed further in the Green Belt and Countryside topic paper.
Need clarity between how GB and CBGB will be treated	The 'Proposed Submission Local Plan: strategy and sites' has two different policies for each designation to help distinguish them and provide clarity between them.
RE4 consistent with NPPF and should be similar protection in new Local Plan (prevent coalescence and protect intrinsic beauty of countryside)	The 'Proposed Submission Local Plan: strategy and sites' includes a countryside policy which seeks to protect this land from inappropriate development.
Oppose changing the boundaries/ inseting from the Green Belt	We consider that there are exceptional circumstances that justify amending Green Belt boundaries. This includes the high level of need and insufficient alternative sites. The NPPF requires those villages that do not make an important contribution to the openness of the Green Belt to be inset.
Change based on land ownership, not land character	The GBCS identified potential development areas and inset boundaries with no knowledge of landownership or landowner intentions.
Have not demonstrated exceptional circumstances/ unmet housing need does not constitute exceptional circumstances to review Green Belt boundaries/ Producing a Local Plan is not considered an exceptional circumstance	The Green Belt and countryside topic paper includes commentary on why we consider there are exceptional circumstances to warrant amending Green Belt boundaries. The NPPG states that unmet housing need does not necessarily constitute very special circumstances for development in the Green Belt. This is a different test and, as made clear in case law, is a more demanding test than the exceptional circumstances test.
The Metropolitan Green Belt is not Guildford Borough Council's to subsume and build on	It may be the Metropolitan Green Belt however this land is designated through our Local Plan.
Should safeguard more land to meet two plan periods/spread constrained development over two plan periods / Safeguarded land should be adjoining the urban areas	The 'Proposed Submission Local Plan: strategy and sites' does not identify any safeguarded land. We do not consider that is appropriate for Guildford. Further information on this is available in the Green Belt and countryside topic paper.
GB reviewed only 10 years ago / GB should be permanent / last review was supposed to be permanent	National policy has changed since the Local Plan 2003 was prepared. We are required to maximise opportunities to meet our development needs. This includes considering whether Green Belt boundaries should be amended.
University had promised not to develop Blackwell Farm and open it up for public recreation instead	Blackwell Farm is being promoted for development and is a reasonable alternative that we must consider as part of the Local Plan process. If allocated the Suitable Alternative Natural Greenspace (SANG) will be accessible to the public for recreation purposes.
The Green Belt cannot be developed merely for short term gain	We consider that there are long-term implications if we do not seek to meet our development needs (both in terms of our economy but also in terms of ever worsening affordability issues).
Should read: Small scale business development...rural economy	The NPPF states at paragraph 25 that: <i>This sequential approach should not be applied to applications for small scale rural offices or other small scale rural development.</i> This refers to all uses therefore that are normally the subject of a sequential test.

Issue	Guildford Borough Council Response
AONB/Green Belt are constraints to meeting OAN / Housing figure too high / 18% increase	The 'Proposed Submission Local Plan: strategy and sites' uses Green Belt and AONB as a constraint however we still consider that we can meet our development needs in spite of this. The West Surrey SHMA has been prepared in accordance with national policy and guidance, and we consider represents a robust analysis of our OAN.
Green Belt should be protected / future generations	The 'Proposed Submission Local Plan: strategy and sites' includes a policy which seeks to protect the Green Belt from inappropriate development.
The following should be used instead:	
Brownfield land / non-GB land should be used instead	This development option is higher in our spatial hierarchy, however there is insufficient land within this option to meet our needs.
High density development should be used instead	Whilst it is important that we make efficient use of land, we nevertheless need to also respond to character and context.
The university has unimplemented planning permission which would free up general market housing in town centre- should be used instead	The University is still in the process of implementing their outline planning permission at the rate at which they need it.
Bring into use unoccupied homes instead	Whilst our Housing Strategy seeks to maximise opportunities to bring empty homes back into use this is unlikely to yield large numbers. In 2013, there were only 470 long-term empty homes in the borough.
Land allocated for commercial use in town centre / urban areas instead	National policy requires that we use the sequential approach for allocating business and retail uses starting with the town centre. It is also important that we provide a mix of uses that meets all of our needs in order to create sustainable communities.
Neighbouring boroughs should be used instead	National policy requires that we maximise opportunities to meet our own needs in the first instance. Where this is not possible we should cooperate with our neighbours in our housing market area to see whether they could help meet any unmet need. We consider that we are able to meet our needs.
Other parts of the country – South East is too densely populated – should accommodate development	National policy requires that we assess and seek to meet the full need identified across the housing market area. Other parts of the country will have their own needs that they must try and meet.
Would impact AONB/AGLV	We have used AONB/AGLV considerations as a constraint. Any planning application will need to demonstrate how any adverse impacts on the landscape can be mitigated against.
Contrary to Policy 9 proposals / review of boundaries	The Green Belt policy will seek to protect all land that remains designated as Green belt from inappropriate development.
Undermines Local Plan 2003 policy	The new Local Plan will eventually replace the Local Plan 2003.
Prevents sprawl of London / neighbouring areas	The Green Belt that remains designated in the 'Proposed Submission Local Plan: strategy and sites' will continue to prevent urban sprawl.
Housing figure based on out of date population projections / New SHMA not published	These comments have been responded to in the table for Appendix C: Evidence Base

Issue	Guildford Borough Council Response
All Green Belt should be protected as meets the five purposes set out in NPPF / government statements	The GBCS has assessed which land could be removed from the green Belt without harming it's main purpose.
Green Belt preserves air quality / prevents flooding / important recreation/ Health benefits / Economic role / tourism / biodiversity / green lungs	The NPPF requires that we maximise opportunities for the beneficial use of Green Belt which we will seek to do. This includes increasing opportunities for outdoor recreation and improving biodiversity.
Agricultural land needs to be retained	Agricultural land quality is a consideration in the Sustainability Appraisal process.
Should only build affordable housing	Whilst we will maximise opportunities to deliver much needed affordable homes, the NPPF also requires that we deliver the necessary market homes.
Homes will not be affordable	Homes built as affordable housing will have to meet the government's definition of affordable housing at the time
Opposed to infilling	The NPPF allows limited infilling in villages washed over by the Green Belt. The 'Proposed Submission Local Plan: strategy and sites' lists the villages within which this is applicable.
Oppose major extensions to the existing settlements	Our spatial strategy is based upon a hierarchy prioritises more sustainably development options. Large scale sites are often able to deliver a great level of supporting infrastructure than smaller sites. The 'Proposed Submission Local Plan: strategy and sites' allocates a mixture of sites.
Infrastructure cannot cope with scale of development	Some existing infrastructure will need upgrading / expanding and some new infrastructure will be needed to support planned development.
Will impact quality of life for local residents and communities	There are other policies that ensure that development is well planned in order to create high quality places with the supporting infrastructure that is needed. Through the planning application process we will seek to secure the necessary conditions to ensure that the impact on existing residents is minimised.
Harm character of area	There are other policies that ensure that development responds to the surrounding character and any heritage assets.
Any rural exception site must be related solely to local jobs	No reason to exclude people living or with family connections to the village.
Redundant farm buildings, close to village centres, must be the first place to look for small scale exception sites	Where such sites are made available for rural exception housing, these will be considered. There are also permitted development rights for some farm buildings to be converted to residential use, which could well be market housing.
Development at Wisley airfield contravenes the aspiration of assisting in safeguarding the countryside from encroachment	The GBCS has assessed which land could be removed from the green Belt without harming it's main purpose.
No alternatives to Former Wisley Airfield assessed	Volume V of the GBCS only assessed Wisley airfield for a potential new settlement as there was no other site of sufficient scale that was know to be available. If another site had become available, we would have assessed the merits of that land too.
Less populated rural areas out-voted by populous urban areas	The spatial strategy is informed by the hierarchy. This is based on sustainability rather than resident population.
Development proposed is not fairly distributed	Our spatial strategy is based on sustainability considerations and not necessarily even distribution.

Issue	Guildford Borough Council Response
Blackwell Farm – financial rather than educational reasons for development	Development at Blackwell Farm contributes towards meeting our objectively assessed need. Profits arising from the development of this site would however also help support the continued prosperity of the University.
Oppose development at Blackwell Farm and at Gosden Hill Farm	This comment is responded to in Planning for sites
Oppose building on Pewley Down	Pewley Down is no longer identified as a potential development area in the GBCS as a result of further work in Volume II Addendum
Oppose to inseting Effingham due to Conservation Area	This comment is responded to in the table for Policy 10
Oppose traveller's pitch in East Horsley - falls directly within the East Horsley Conservation Area	This site is no longer included as a site allocation in the 'Proposed Submission Local Plan: strategy and sites'. It is included in the LAA as a realistic candidate for development of new homes, however, it is not identified as contributing towards the supply of Traveller provision.
Opposed to removing Green Belt for Traveller Pitches	The NPPF says we should create sustainable, inclusive and mixed communities, and that we should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community. Our Local Plan must meet all needs, including traveller needs. In order to ensure that Traveller sites are able to be delivered it is necessary to inset them from the Green Belt. To not inset them would lead to uncertainty over whether or not they would be able to achieve planning permission.
Plan should reflect Localism – listen to local opinions	The Local Plan will need to be approved by councillors who are democratically elected by residents.
Term 'safeguarded' is misleading	Land is safeguarded for development not from development.
Sets a precedent for future removal/ development	Green Belt boundaries can only be amended through the Local Plan process.
Detailed comments on issues with evidence base	These comments have been responded to in Appendix C: Evidence Base
The Green Belt policies of the NPPF are being ignored by GBC	The Green Belt policy in the 'Proposed Submission Local Plan: strategy and sites' states that we will protect the Green Belt from inappropriate development in accordance with national policy.
Para 4.123 should provide clarity regarding how the review of the green belt boundary has contributed to the development strategy of the plan	This level of information is contained in the supporting topic papers rather than the Local Plan itself.
Para 4.122 should be included in policy wording	Comment noted. Elements have been included into the policy in the 'Proposed Submission Local Plan: strategy and sites'.
Policy should include all relevant core principles in NPPF/explain how meeting these principles	A Local Plan should not repeat the NPPF. All planning applications would need to be considered in accordance with national policy as well as the Local Plan.
More emphasis on protection of countryside than GB / strategic gap at Ash specifically mentioned but not for Effingham & Bookham / should have areas of separation in other places	The Green Belt designation is much more restrictive than countryside. The 'Proposed Submission Local Plan: strategy and sites' has split this policy into two to provide greater clarity. We do not consider that an area of separation is required at Effingham as the Green Belt here and in neighbouring Mole Valley serves to prevent coalescence.
Worplesdon appears to take the brunt of new development - the full proposals	The 'Proposed Submission Local Plan: strategy and sites' no longer allocates a

Issue	Guildford Borough Council Response
would see a 71% increase in the area	number of sites previously identified at Worplesdon as a result of the new Green Belt sensitivity approach
Godalming NP is being produced – 100 homes. Need to coordinate plans and ensure scale of development is sustainable regardless of administrative boundary	We will continue cooperating with Waverley Borough Council to ensure that we understand the impact of development within the wider area.
Designate Local Green Space between Beechcroft Drive and Manor Copse	Policy 14 is a strategic policy and deals with biodiversity and open space at the strategic scale. The purpose of the Local Green Space designation is to protect spaces of local significance. Where proposals for Local Green Spaces meet the criteria set out in the NPPF, these will be designated through Development Management policies, or through neighbourhood plan policies.
Question deliverability of big infrastructure schemes (new stations/ electrification/ bridge upgrades)	<p>The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'. Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Transport Strategy and IDP may therefore be updated to include these.</p> <p>Arrangements for the long term strategic planning and funding of both the rail network and the Strategic Road Network are in place. The Department for Transport's Road Investment Strategy (March 2015) mandates the development of several schemes for the Strategic Road Network in or near Guildford borough.</p> <p>Funding for the delivery of schemes in our transport strategy will come from a variety of sources, principally:</p> <ul style="list-style-type: none"> • Government funding to Network Rail, Highways England and Surrey County Council to fund their forward plans for improvement of their transport infrastructure assets • Local Growth Fund, administered by the Enterprise M3 Local Enterprise Partnership, and distributed to schemes on a competitive basis • Planning obligations required of developers to deliver site specific infrastructure such as highway junction improvements • Developer contributions • Guildford Borough Council investments.
4.126, 4.127, and 4.128 should be under Policy 14	Paragraphs 4.126 and 4.127 have been removed from the Green Belt policy. Some of the wording is now included in the Leisure and Visitor Experience policy.
Sentence re: strategic gap should be under policy 11	Comment noted. This is now included as part of the policy on countryside.
Level of growth in villages not in accordance with economic strategy (Horsleys)	Whilst the Economic Strategy has been using to help inform the production of the

Issue	Guildford Borough Council Response
	Local Plan, it will not be used to guide the location of development.
Safeguarding creates blight	No longer applicable as the Proposed Submission Local Plan no longer identifies safeguarded land.
Oppose reclassifying the Commons as SANG	This comment is addressed under the section that deals with SANGs.
Policy should allow for the reuse of existing rural buildings to provide residential accommodation	The NPPF already enables the reuse of buildings. There is no need to repeat this in the Local Plan.
Policy doesn't mention permanence of Green Belt Boundaries	The Local Plan refers to the NPPF and states that the aim of Green Belt is to keep land permanently open.
Stronger wording is needed to protect Guildford's Green Belt and historic assets. All assets which need protection need listing in Policy 12.	The supporting text to the draft Historic Environment policy states what are designated heritage assets and what are un designated heritage assets, all of which will be covered by the policy.
Infrastructure is a constraint but not mentioned	Delivering infrastructure to support planned development is considered in draft Policy 17
Local communities should be given the power to propose changes as part of their community plans	Local communities can prepare Neighbourhood Plans, however strategic matters must be addressed in the Local Plan.
Inconsistent as fails to protect Green Belt	This policy seeks to protect the Green Belt as designated on the revised Policies Map from inappropriate development.
Amending green belt boundaries is not required by law	We need to consider whether there are exceptional circumstances that justify amending Green Belt boundaries. We will need to demonstrate at examination that our Local Plan is sound and has sought to, where sustainable to do so, meet identified needs.
Not sustainable development	The Sustainability Appraisal process considers all dimensions of sustainability. Our Local Plan has been informed by the process.
The relationship between this policy and other key policies within the Plan should be clarified.	The Local Plan needs to be read as a whole. Any planning applications will be determined in accordance with national policy, relevant local plan policies and other material considerations.
Tension between the purposes of the Green Belt and the impact of the CLLR development	<p>Comments noted.</p> <p>The Clay Lane Link Road scheme is considered not to be a key infrastructure requirement on which the delivery of the 'Proposed Submission Local Plan: strategy and sites' depends.</p>
GBC needs to consult with Mole Valley District Council about Green Belt boundary between Effingham and Bookham	We will continue to cooperate with Mole Valley as part of the Local Plan process under Duty to Cooperate to ensure that cross boundary issues are addressed. This includes Green Belt reviews that may impact on neighbouring local authorities.
Support Bell and Colvill site but do not increase size with adjacent green field land	This comment has been responded to in Planning for sites
Support development of BT telephone exchange	This comment has been responded to in Planning for sites
Oppose Thatchers Hotel and Horsley Towers being included in inset – SSSI and protected land	These comments have been responded to in policy 9
Oppose the proposal to remove the land owned by the University from Green Belt	This comment has been responded to in Planning for sites
Object the proposal to put a car park on Effingham Common	This comment is addressed under the section that deals with SANGs

Issue	Guildford Borough Council Response
Plans should include appropriate and funded infrastructure proposals with evidence that they will not exacerbate existing traffic flow	<p>The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'. Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Transport Strategy and IDP may therefore be updated to include these.</p> <p>The strategic transport assessment assesses the impact of planned growth in the plan period and the impact of infrastructure proposed in the Infrastructure Schedule in mitigating the impact of the planned growth.</p> <p>The NPPF states that "Plans and decisions should take account of whether: ... improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe" (paragraph 32).</p>
H1 and H2 is the same parcel of land. There is no clear boundary between them / assessing separately influenced scoring (coalescence / historical setting)	These comments have been responded to in the table for Appendix C: Evidence Base
Blackwell Farm meets all purposes/ northern section particularly	These comments have been responded to in the table for Appendix C: Evidence Base
Safeguarded land at Normandy should remain in the Green Belt	This is contrary to the NPPF
Senior school at Whitmoor should remain in the Green Belt	This comment has been responded to in Planning for sites
Senior school at Clandon should remain in the Green Belt	This comment has been responded to in Planning for sites
Ash and Tongham should be safeguarded land for future development, rather than Normandy	No longer applicable as the 'Proposed Submission Local Plan: strategy and sites' no longer identifies safeguarded land.
It is not credible to have a plan without a vision	The 'Proposed Submission Local Plan: strategy and sites' includes a vision.
Guildford and Waverley need to work together to ensure Duty to Cooperate	Comment noted
Should develop Stonebridge – can mitigate contamination	Whilst contamination is a constraint to development, and a viability consideration, the land is Green Belt, and is not proposed to be inset from the Green Belt. We have used our spatial hierarchy to direct development towards those areas that are the most sustainable.
Refers to Policies map but not clear what this is	Comment noted. We will be more explicit regarding where the Policies Map can be viewed.
Some sites have been included without landowner consent	In order to be allocated, a site must be available for development. We therefore need to have landowner confirmation of their intention to develop the land.
Should redevelop River Wey – higher density include homes/riverside park	High flood risk is a significant constraint to development along the River Wey. Local Plan allocations need to pass a flood risk sequential test, and demonstrate that there is no alternative site at less risk of flooding. With a few exceptions, National Planning policy says that development in flood zone 3b (functional flood plain)

Issue	Guildford Borough Council Response
	should be refused.
Masterplanned town centre - regeneration	Guildford Borough Council is currently progressing a non-statutory town centre regeneration / delivery plan to co-ordinate redevelopment of several council-owned sites that are more complex to redevelop. This may be due to their risk of flooding, co-ordinate traffic improvements, pedestrianisation and improvements to the riverside and public areas of the town centre.
Should replace commercial land in town centre with homes at a higher density	We have maximised opportunities for development in the town centre including on currently commercial land where appropriate. We need to meet all needs including employment needs and must ensure that all uses are located in sustainable locations.
The last sentence in paragraph 4.125 regarding the strategic development gap separating Ash, Tongham and Aldershot should be under Policy 11	The policy focussed on Ash and Tongham has been removed from the Proposed Submission Local Plan and captured under Policy P3 Countryside .
It should be made clear that once Green Belt boundaries are revised, the boundaries will be strongly defended as permanent. Commitment needs to be explicit. Para 4.122 needs to be included in the policy wording	A Local Plan should not repeat the NPPF. All planning applications would need to be considered in accordance with national policy as well as the Local Plan.

Comments on Policy 11: Ash and Tongham Strategic Location for Growth

Issue	Guildford Borough Council Response
<p>Ash Green is not a strategic location for growth and needs to be protected from growth in Ash and Tongham/distinguished from the town:</p> <ul style="list-style-type: none"> • The settlement boundary is incorrect, it should include homes to the north of Ash Green. The settlement has historically included the properties of Ash Green Road and Drovers Way. The northern Settlement Boundary line of Ash Green must be shown in the Local Plan as running along Ash Green Road. Appendix G proposes a new settlement boundary that stops at the old railway track and does not include Old Ash Green Station, Whiteways Cottage or the houses of Ash Green Road and Drovers Way which will cut Ash Green in half calling one part an 'area of separation'. The boundary of Ash would then be pushed out across fields which separate Ash and Ash Green, promoting coalescence. • The Area of Separation should include fields north and east of Ash Green Road • The Area of Separation should be larger to preserve the rural character of Ash Green • The Area of Separation needs stronger wording to support the policy/it should outlaw development/it should have Green Belt status – development in the ribbon is modest and would be suitable for this designation 	<p>The Proposed Submission Local Plan identifies Ash Green as an inset village (inset from the Green Belt), and surround the village with Green Belt. This retains the separation of Ash Green from Ash and Tongham Urban Area, and provides greater protection to the land on the edge of the village.</p> <p>Whilst Drovers Way is proposed to be included in the Ash and Tongham Urban Area, Site Allocation Policy A28 requires development to recognise the historic location of Ash Green village, noting that the properties along Ash Green Road have historically been considered to form part of Ash Green village. Whilst this land is now proposed to be included within the Ash and Tongham urban area, proposals for the land west of this road should respect the historical context of this area. This should include the provision of a green buffer that seeks to maintain a sense of separation between the proposed new development and the properties fronting onto Ash Green Road. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond.</p>

Issue	Guildford Borough Council Response
<ul style="list-style-type: none"> • Site 56 is too close to the existing settlement. If it is developed, there will be no area of separation. • The SANG to the south should be given Green Belt status so the village is surrounded by Green Belt on 4 sides. If the SANG is not brought forward, it should receive a protective designation. • The proposed area of separation includes developed land so will not meet the stated purpose • It should be clarified that Ash Green is outside the Strategic Location for Growth 	
<p>The West of the borough is receiving treatment and consideration that is favourable when compared to the rest of the borough:</p> <ul style="list-style-type: none"> • Development is concentrated in the East of the borough • The West is receiving protective designations, the East isn't • Ash and Tongham have been singled out for infrastructure improvements at a detail not provided for other areas • Separation is being protected in the West but not elsewhere • Green belt is being sacrificed elsewhere but increased at Ash and Tongham • Ash is being protected from coalescence while other parts of the borough are having that protection removed. • This part of the borough gets a policy all of its own • There is concentration on infrastructure improvements in Ash but not in other parts of the borough. The section on infrastructure should be applied to Policy 4 so it covers the whole borough • The strategic gap between Ash/Tongham and Aldershot is being maintained, but not the gaps elsewhere. It has not been established why normal planning policy would not be sufficient to maintain this gap • Creating Green Belt in one area while removing it elsewhere is unsound. Non Green Belt land should be considered for development before Green Belt is released and there shouldn't be a trade off. This is established in Gallagher Homes v Solihull, therefore CBGB should be used before GB release can be considered. Land can only be added to the Green Belt in Exceptional Circumstances. • CGBG should be the first option for development, not Green Belt land. • This is because members of the Executive are based in Ash and Tongham • NPPF para. 82 sets out the tests needed to establish new Green Belt. The DLP should explain and justify how these have been met. • The DLP should explain whether the new Green Belt is an extension to the Metropolitan Green Belt or a new Ash/Tongham Green Belt. • The exceptional circumstances for the Green Belt boundary changes have 	<p>The spatial hierarchy that has been used to inform our strategy is based on sustainability. We have used our spatial hierarchy to direct development towards those areas that are the most sustainable. Countryside beyond the Green Belt is higher in the hierarchy and we have sought to maximise sustainable development opportunities here prior to considering Green Belt release elsewhere.</p> <p>The Ash and Tongham area is identified to accommodate approximately 2000 new homes (including land already with planning permission). In addition, over 1000 new homes are proposed at Normandy, and 1800 are proposed at Blackwell Farm, both on the west side of the borough.</p> <p>An amendment to Green Belt boundaries at Tongham and Ash Green retains the separation of the village of Ash Green from Ash and Tongham. We consider that there are exceptional circumstances which justify amending Green Belt boundaries. More information is available in topic papers.</p> <p>The Proposed Submission Local Plan retains the essence of current Local Plan policy R11- The Blackwater Valley, within Policy P3 Countryside, including the requirement that development “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area and Aldershot”. However, development is proposed in land currently in the gap (Site Allocation A29 – land at the southern point in Tongham).</p> <p>The Infrastructure Delivery Plan sets out the infrastructure that is required to support development, the cost to provide it and how it will be funded.</p>

Issue	Guildford Borough Council Response
<p>not been addressed/stated/defined</p> <ul style="list-style-type: none"> The proposed new Green Belt would not meet the purposes of the Green Belt as well as the areas that are proposed for release. The area proposed for new Green Belt does not seem to have been properly assessed in this regard. The Green Belt proposing to be lost at Blackwell Farm is better Green Belt than the proposed new Green belt at Ash or other Strategic sites. There is concentration on infrastructure improvements in Ash but not in other parts of the borough. The section on infrastructure should be removed from policy 11 and applied to Policy 4 so it covers the whole borough 	
<p>Support</p> <ul style="list-style-type: none"> the policies and inseting maps that identify the Strategic Location for Growth the Area of Protection The new Green Belt land The use of an SPD Supporting infrastructure to correct current deficit Where major housing is proposed, complementary employment floorspace is carefully matched to the needs of the market so that capacity for local jobs and business growth is delivered not just given lip service. 	<p>Comments noted. The Proposed Submission Local Plan has updated proposals for this area, particularly with regard to current planning permissions, and proposals to ensure Ash Green retains separation from Ash and Tongham urban area. The fractured land ownership in this area and current national planning policy that enables planning permissions for new homes to be granted where appropriate, makes delivering uses other than housing (e.g employment land) challenging, as individual landowners are bringing forward sites for development on an ad hoc basis.</p>
<p>Cumulative development/scale of development</p> <ul style="list-style-type: none"> The development proposed for Ash should not go ahead as there is already a large development proposed for Aldershot. The plan should take account of development in Rushmoor There is a danger of Urban Sprawl from Farnborough to Aldershot Plan policies relating to the Blackwater Valley urban area should be the outcome of on-going, constructive and continuous engagement between the local authorities whose areas fall within it. The draft Guildford Local Plan proposes a strategic growth location within the wider Blackwater Valley area but it has not acknowledged the potential cumulative cross border impacts or set the policy in the wider Blackwater Valley context. No attempts have been made by Guildford to undertake partnership working on this matter with Surrey Heath, or the other Blackwater Valley authorities as a group. The Plan makes no mention of cross boundary sites (with Surrey Heath) or the future direction for these sites. It is also important that engagement and dialogue in relation to them is constructive and ongoing. 	<p>The strategic transport assessment for the 'Proposed Submission Local Plan: strategy and sites' assesses the impact of planned growth in the plan period and the impact of infrastructure proposed in the Infrastructure Schedule in mitigating the impact of the planned growth. The assessment takes account of forecast growth external to Guildford borough, which includes the Aldershot Urban Extension.</p> <p>Under the Duty to Cooperate we have worked with adjoining authorities to understand the cumulative impact of development within this area, notably on transport, SANGs and education. The Proposed Submission Local Plan now includes Policy P3: Countryside, which acknowledges that whilst Ash and Tongham forms part of the wider Blackwater Valley urban conurbation, it is important that it retains its distinct identity through the protection of the countryside that forms a strategic gap.</p> <p>The Proposed Submission Local Plan does not propose any cross boundary site allocations with Surrey Heath. Whilst it proposes to inset from the Green Belt Pirbright and Keogh Barracks, which are close to the borough boundary, these sites are not being allocated.</p>

Issue	Guildford Borough Council Response
<ul style="list-style-type: none"> • At present, individual developments are being approved with little or no consideration being given to the infrastructure in Ash, Ash Vale and Tongham. <ul style="list-style-type: none"> ○ Schools are over-subscribed ○ the road network in and around these villages cannot cope during the morning and evening peak times ○ it is not unusual to have to wait for three weeks for a doctors or dentists appointment. ○ GBC is not checking the dodgy calculations (e.g. school places) provided for planning applications ○ The SWMP shows that flood infrastructure is already in deficit • This is too much development considering the local flooding situation which should act as a constraint • Development should not be so high as to increase commuting to Guildford. Development should be focused on Guildford. • Ash, Ash Vale and Tongham are part of the much wider Aldershot Built up Area which extends over a number of local authorities. According to the ONS it is the 29th largest urban area in England and Wales, is often referred to as the Blackwater Valley urban area and its presence in the western area of Guildford Borough is significant component of the spatial pattern of development in the Borough. It would be useful for the Borough wide strategy (set out in Policy 2 of the draft Plan) to acknowledge this significant urban area and set out the future directions for it in the context of the Guildford spatial strategy. • The wider impact of any potential land releases on Farnham should be considered. These impacts, including those on the Thames Basin Heaths SPA, should be addressed in the subsequent Supplementary Planning Document and any subsequent planning applications. 	<p>The infrastructure needed to support the planned development is outlined in the Infrastructure Schedule in the draft Local Plan. In addition, Site Allocation Policy A30 allocates land for a new road bridge and footbridge to enable the closure of the level crossing on the A323 Guildford Road, adjacent to Ash railway station, and policy A29 which requires that as part of proposed development “Proposed road layout or layouts to provide connections between both the individual development sites within this site allocation and between Ash Lodge Drive and Foreman Road, providing a through road connection between Ash Lodge Drive and Foreman Road, in order to maximise accessibility and to help alleviate congestion on the A323 corridor”.</p> <p>The flood risk in this area relates to surface water. Policy A29 requires “Appropriate surface water flooding mitigation measures, with specific regard to the Ash Surface Water Study”</p>
<p>Support but:</p> <ul style="list-style-type: none"> • The plan needs to take growth in Rushmoor into account to provide adequate infrastructure and take account of traffic • The plan needs to include Surrey Heath • The plan needs to include Waverley BC • The situation at Waverley shows that DtC is a key issue. Development at Ash is a key cross border issue that needs to be covered through DtC. • The infrastructure policy should be applied across the borough to all settlements equally • The deprivation indices show that care needs to be taken in this area. 	<p>Evidence to demonstrate that we have fulfilled our legal Duty to Cooperate is included within the Duty to Cooperate topic paper.</p>

Issue	Guildford Borough Council Response
<p>There is a major area of relative multiple deprivation just across the boundary in Rushmoor and the urban area of Ash South & Tongham has expanded, in part at least, because the area is beyond the restrictive controls of the Green Belt.</p>	
<p>The proposed SPD should be produced alongside the Local Plan, not programmed to come later</p> <ul style="list-style-type: none"> • Site 56 is being brought forward on a piecemeal basis • With piecemeal development, the infrastructure provision will not be enough to deal with the cumulative impact. Infrastructure needs to be planned in advance • Flood risk mitigation needs to be planned strategically • Hampshire County Council would like to be involved in the preparation of a vision for the area • The SA identifies the current issues on the road around the existing pinch point of the level crossing at Ash railway station. This regularly causes traffic to tail back almost a mile to the Guildford Road/Pirbright Road junction on the A323. This part of the highway network is already well beyond capacity (as identified within SCC's Transport Assessment, January 2014) so there must be a co-ordinated approach to future local infrastructure provision. More transport planning work in light of SCC's findings within its TA is required before the LPA can conclude that this area is strategically appropriate for the level of residential development proposed. • There are no guarantees that the highway impact of the proposed Ash housing development can be mitigated and, unless this can be proved otherwise, the LPA could find themselves in the position of not being able to deliver on its housing allocations. 	<p>We are no longer proposing to prepare an SPD for Ash and Tongham.</p> <p>The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'.</p> <p>As planning applications are considered for the sites identified in the new Local Plan, additional transport schemes to address site access and other localised issues may be secured.</p> <p>In addition, Site Allocation Policy A30 allocates land for a new road bridge and footbridge to enable the closure of the level crossing on the A323 Guildford Road, adjacent to Ash railway station, and policy A29 which requires that as part of proposed development "Proposed road layout or layouts to provide connections between both the individual development sites within this site allocation and between Ash Lodge Drive and Foreman Road, providing a through road connection between Ash Lodge Drive and Foreman Road, in order to maximise accessibility and to help alleviate congestion on the A323 corridor".</p> <p>Parts of this area have been identified as a surface water flooding hotspot, and an Action Plan has been prepared to resolve these issues.</p>
<p>The policy does not:</p> <ul style="list-style-type: none"> ○ explain what the vision is for this side of the Borough, including its relationship with the rest of Guildford and the Blackwater Valley; ○ identify the type of development envisaged for the area; ○ clearly identify the strategic designation on the proposals map; ○ explain what specific development principles future development in the strategic growth area would be expected to follow; ○ clearly identify the infrastructure required to support development at this site; ○ identify the quantum of development is expected to be developed in the area (see below). 	<p>The Proposed Submission Local Plan at Policy A29 sets out:</p> <ul style="list-style-type: none"> • The site that is allocated • The quantum of growth • The requirements and opportunities for the site • Key considerations that any planning applications will need to consider <p>The Proposed Submission Local Plan is also supported by an Infrastructure Delivery Plan.</p>

Issue	Guildford Borough Council Response
<ul style="list-style-type: none"> • There is overemphasis in the Plan on land which is designated as beyond the Green Belt. This policy should include a clear objection to further linear development along the roads between Guildford and Cranleigh, Dorking, Farnham, Godalming, Leatherhead, and Woking. • The "Land surrounding Ash and Tongham" is not defined clearly in the Policy Map and there is no boundary for the Strategic Area for Growth. • The published documents are contradictory. For example, Table 1 identifies that between 2015 and 2031 there will be a net increase in homes of 1,215 in the Ash and Tongham Urban area and up to 95,500sqm of employment floorspace. However, the site allocation schedule for the Ash and Tongham Urban Area identifies site allocation 56 (land at Ash and Tongham as being suitable for 1,500 dwellings), in addition to allocating two smaller sites for development. It is not clear whether developments that have recently received planning consent or are currently being determined in the Ash and Tongham area are included within the net housing figure detailed in Table 1. 	<p>The Land Availability Assessment and Proposed Submission Local Plan have been updated to identify how many homes are proposed across the borough. Table 1 – planned delivery, has been updated to identify the number of homes proposed, and these correlate with the findings of the LAA. The LAA includes land that has planning permission. A considerable number of homes in Ash and Tongham already have planning permission.</p> <p>The proposed Site Allocations policies do not include land that already has planning permission. As the Proposed Submission Local Plan is amended prior to submission, and then adoption, the site allocations will be amended if land gains planning permission.</p>
<p>Infrastructure</p> <ul style="list-style-type: none"> • The cumulative impact on the infrastructure would be too great. • There are already insufficient school places • Lakeside road/Vale Road railway bridge already needs to be made suitable for 2 way traffic to support Lakeside development. Awaiting delivery. • The drains need regular maintenance as they block frequently and cause flooding • Additional 'bypass' roads in the area are essential (including a bridge over the railway), as well as removing the island on the A31 / A331 junction completely which was a fundamental design flaw when the road was built 	<p>Parts of this area have been identified as a surface water flooding hotspot, and an Action Plan has been prepared to resolve these issues.</p> <p>We are working with Surrey County Council to ensure that sufficient school places are available in the area when they are needed.</p>
<p>The meadows that are proposed for development are prone to flooding, surface water flooding is common in the area. Development must have adaptation to this and not make the problem worse.</p>	<p>The flood risk in this area relates to surface water. Policy A29 requires “Appropriate surface water flooding mitigation measures, with specific regard to the Ash Surface Water Study”</p>
<p>The draft Local Plan should identify more land for development</p> <ul style="list-style-type: none"> • The area of separation and new Green Belt are restrictive designations that prevent development opportunities • The NPPF does not support the Area of Separation designation • The draft Local Plan does not respond positively enough to meet housing needs • The restrictive designations should be removed and the Strategic Location for Growth should be extended 	<p>The Proposed Submission Local Plan no longer proposes an Area of Separation. Instead, the extension to the Green Belt has been extended further to prevent merging of the Ash and Tongham urban area with the village of Ash Green. The justification for this amendment to the Green Belt boundary is included within the Green Belt and countryside topic paper.</p>

Issue	Guildford Borough Council Response
The policy contradicts Policy 10 which places protection on countryside that is not designated as Green Belt	Policy 10 sought to protect the remaining countryside land not proposed to be allocated for development. The Proposed Submission Local Plan also includes a policy on Countryside.
It is stated in Table 1 that the Ash and Tongham area will deliver 1,215 net new homes. However, the table at the start of the 'Planning for sites' supporting document states that the total number of homes to be delivered in the same area (on sites 53-56) would be 1,564 and, in addition to this, that sites 78 and 79 would be developed for 62 and 71 homes respectively. The inconsistency is confusing and should be addressed.	The Proposed Submission Local Plan and Land Availability Assessment (LAA) set out how many homes are proposed in the Ash and Tongham area, and provide clarity of whether this is currently within the urban area or countryside.
The timescale for a proposed Vision for Ash and Tongham is too long as development in some of the sites has already started.	The vision in the Local Plan looks to the end of the plan period. We acknowledge that there are some sites in Ash and Tongham which already have secured or will secure planning permission prior to Local Plan adoption. However these homes will all count as part of housing supply and the infrastructure set out in the Infrastructure Schedule will help support this growth.
There should be a footbridge at Ash station to improve access to Guildford bound trains from the new homes	Scheme LRN21 New road bridge and footbridge scheme to enable level crossing closure on A323 Guildford Road adjacent to Ash railway station is one of the schemes that is considered necessary for the delivery of the draft Local Plan and is written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'. In addition, Site Allocation Policy A30 allocates land for this new road bridge and footbridge.
The number of homes proposed in the draft Local Plan is too great, unsustainable and will have a very detrimental impact on infrastructure	The housing requirement has been based on the OAN set out in the final West Surrey SHMA. The SHMA has been subject to extensive scrutiny and has been prepared by specialist consultants whose methodology has been tested at numerous examinations. We are confident that it is a robust study. The NPPF requires that we maximise opportunities to meet our full needs where this is sustainable to do so. Based on the evidence we have, we consider that we are able to meet our need in spite of constraints within our borough.
This proposal is unpopular in Ash	Comment noted.
Major development should not take place near SPAs, SSSIs or SACs	Natural England is the statutory body tasked with protecting the SPA. It has agreed an approach whereby residential development can take place between 400m and 5km of the SPA with appropriate mitigation. Other forms of development are not considered to have a significant impact. In view of this, it is unlikely to be possible to sustain a blanket ban on major development within this zone. The SACs in Guildford fall on the same land as the SPA. There does not appear to be a compelling reason as to why development should be prevented near SSSIs

Issue	Guildford Borough Council Response
	and SACs. Policy I4 protects designated sites from harmful development.
Ash has huge swathes of ex-military land that is currently unused. This land is ideal for regeneration.	<p>Much of this land is part of the Thames Basin Heaths SPA or within 400m of the Thames Basin Heaths SPA, making it unsuitable for residential development. Equally, it has not been proposed by the landowner for future development.</p> <p>A windfall allowance has been included in the housing trajectory in the Land Availability Assessment (LAA), and any development not identified in the LAA that gains planning permission will count towards supply.</p>
Policy 11 should avoid use of the word 'strategic' and the phrase Strategic Location for Growth as this implies inappropriate, large scale growth.	The Proposed Submission Local Plan no longer includes a policy on the Ash and Tongham Strategic Location for Growth. Instead the planned growth is included as part of Policy A28: Land to the south and east of Ash and Tongham.
The policy should ensure that development is in-keeping with the current environment and the area. Developments in the villages should not exceed 50 homes.	<p>Proposed Site Allocation policies do require sensitive design at site boundaries that has regard to the transition from urban to rural, and village to rural where appropriate.</p> <p>The spatial hierarchy that has been used to inform our strategy is based on sustainability. We have used our spatial hierarchy to direct development towards those areas that are the most sustainable.</p>
With 900 homes either already approved or awaiting approval, the area has already taken a disproportionate amount of building.	<p>The spatial hierarchy that has been used to inform our strategy is based on sustainability. We have used our spatial hierarchy to direct development towards those areas that are the most sustainable.</p> <p>Some areas of the borough are not suitable for development, due to AONB, Thames Basin Heaths SPA and flood risk. Seeking sustainable development is the primary aim of the Local Plan, rather than proportioning development across the borough. However, there is generally an even split of east and west, when taking account of current outstanding planning permissions that have not yet been completed.</p>
Policy and information relating to those areas of the Blackwater Valley and immediate surroundings lying within Guildford is set out in a number of locations throughout the draft Local Plan and it is difficult to identify and pull together as a coherent picture.	Development planned for this area is set out in Policy A27 – A31 whilst the Policy related to the protection of the Blackwater Valley area is set out in Policy P3.
Development and Green Belt release is unfairly concentrated around the settlements in the West of the borough. The villages in the East are not facing amendments to Green Belt boundaries (?)	The spatial hierarchy that has been used to inform our strategy is based on sustainability. We have used our spatial hierarchy to direct development towards those areas that are the most sustainable. Green Belt amendments are proposed in the east of the borough.

Issue	Guildford Borough Council Response
Paragraphs 4.126, 4.127, and 4.128 might be more appropriately located under Policy 14 under a different title such as "Recreation and Tourism"	The issues discussed in paragraphs 4.126, 4.127 and 4.128 are built upon in Policy E6 of the Proposed Submission Local Plan. Policy E6 supports the retention of existing and provision of new small-scale leisure and tourism uses in rural areas.
<p>Countryside Beyond the Green Belt</p> <p>There is no distinction between how the Green Belt is to be treated and how the land Countryside beyond the Green Belt is to be treated. The differences need to be clarified.</p>	The Proposed Submission Local Plan now includes two separate policies for Green Belt and Countryside to help clarify the distinction (Policy P2 and P3).
The council may need to encourage early development of those sites that are most suitable, whilst working with partners, including Enterprise M3 to progress sites that may be more constrained.	The Land Availability Assessment includes a housing trajectory showing when development is likely to be delivered. Where appropriate and deliverable, site allocations will be encouraged to come forward as early as possible in the plan period.
No point of designating an area a safeguarded site if you are only going to release it the minute a developer wants to use it.	We no longer believe that safeguarding is an appropriate option for Guildford. This is discussed further in the Green Belt and Countryside topic paper.

Comments on Policy 12: Historic Environment

Issue	Guildford Borough Council Response
<p>The wording of the policy is loose, weak, uncertain, insufficiently detailed</p> <ul style="list-style-type: none"> • 'will seek to ensure that it makes a positive contribution' • 'It is hoped' • 'The Delivering development document will look to...' • It should include wording from NPPF 133 • The monitoring processes are weak • The policy needs more specific detail • The policy should include a specific requirement for development to meet a high standard of design, particularly in Conservation Areas and where listed buildings are affected. • The policy should incorporate words from the NPPF: "heritage assets are an irreplaceable resource" • It does not commit the Council to preserving historic assets • The policy should state "We will prevent development that fails to recognise, protect and enhance the borough's distinctive heritage and landscape assets, character and their settings". • The policy should include the text 'Where a designated or undesignated heritage site is redeveloped, new buildings should be of a similarly high architectural standard as the original asset' 	<p>The wording of the policy has been strengthened and the supporting text refers to the NPPF.</p> <p>This is a strategic policy, the detailed policy will be developed when we write development management policies.</p> <p>The policy will not be applied in isolation, design issues are covered elsewhere in the plan and these policies will be used in conjunction with the Historic Environment policy where appropriate.</p> <p>The policy now contains the phrase "heritage assets are an irreplaceable resource" and will commit the Council to ensuring that the historic environment will be conserved and enhanced in a manner appropriate to its significance.</p> <p>The loss of an heritage asset would not be permitted without a clear justification to show that the public benefit of the proposal would considerably outweigh the harm, if a replacement building were to be proposed then the design policy would be applied to the assessment of the new scheme.</p>

Issue	Guildford Borough Council Response
<p>The policy should go further/has omissions:</p> <ul style="list-style-type: none"> • It is not clear how the policy will be enforced – this information should be provided • It does not do enough to protect development from adjacent development • There is no information on undesignated heritage assets • The policy does not cover/should prohibit proximity to historic buildings and the scale of development. Historic buildings will be at risk from vibrations caused by increased traffic. Development should be restricted in proximity to the heritage assets whether in the villages or the borough, in accordance with NPPF paras 126, 126 and 133 • The listed buildings in the borough have not been assessed • The policy should make a specific reference to street furniture. Guildford has a wealth of heritage street furniture which needs to be protected, conserved and maintained • There is no vision statement for Guildford Town • Phrases like ‘we intend’ ‘we are in the process’ ‘we will further’ suggest much of the work has not yet been done. The policy is premature. • All assets which need protection need listing in Policy 12. • Much more measurement, strength and enforcement is required. Example: The Schedule Ancient Monument in Strawberry Copse which has been allowed to decay under in undergrowth • A number of parts of the borough do not have a Conservation Area Character Appraisal; including the West Horsley Conservation Area. To ensure the robustness of this policy the Council should produce an Appraisal which takes account of the proposed changes to the settlement boundary and planned future development. • We need to be able to do more to protect buildings of character on the periphery of our Conservation Areas. Buildings of merit do not always fit neatly into boundaries. For example, we have been powerless to prevent the demolition of Bargate stone buildings on the Epsom Road of equal merit to those within the Conservation Area, the boundary of which stops but a few properties away. The policy should encourage particular consideration to be given to the retention of buildings that contribute to character just beyond the boundaries of Conservation Areas. • Undesignated assets should be reviewed in light of the challenges posed by the current Plan Review process. Such assets should not prejudice the delivery of new development. • The policy does not cover natural heritage assets. This should supplement policy 19, which does not do this adequately. • Add Conservation Area Appraisals to both the “Monitoring indicators” and 	<p>This is a strategic policy and the forthcoming Local Plan: Development Management Policies document will add more detail. The Council will continue to use policies in their existing local plan until this document is available.</p> <p>The importance of undesignated heritage assets has been acknowledged in the strategic policy, applications affecting their significance will be assessed accordingly.</p> <p>The setting of heritage assets is discussed in the supporting text and will be taken into account in decision making.</p> <p>The policy will apply to all heritage assets both designated and undesignated, these are listed in paragraph 4.137 in the supporting text.</p> <p>The Heritage Topic Paper will include a broad assessment of Guildford Boroughs heritage. We are aware that the majority of our existing conservation areas do not have appraisal documents. We will look to undertake a programme of writing conservation area appraisals separately from the local plan process.</p> <p>This policy will be used in conjunction with others in the plan where relevant, natural assets are covered under a separate policy.</p> <p>The monitoring processes for this policy have been strengthened and the number of conservation area appraisals added.</p> <p>This policy will be used in conjunction with the design policy “Making Better Places” to ensure that the context of new development is taken into account during the planning process.</p> <p>The policy will not include a list of all of the borough’s heritage assets, this information is available on the Councils website.</p>

Issue	Guildford Borough Council Response
<p>the “Key Evidence”</p> <ul style="list-style-type: none"> • The monitoring processes are weak for this policy • The context, surroundings and environment must be protected to ensure that the integrity of Guildford as a Gap Town is preserved. • The Guildford Society has established a series of position papers, much of the content of which could and should form the basis for the policies in this Draft Local Plan and its companion Development Control Local Plan. • The policy should include a list and map of heritage assets. Also, Guildford Borough has 151 designated Areas of High Archaeological Potential; 37 County Sites of Archaeological Importance; 35 Scheduled Monuments and 10 Registered Parks/Gardens. These all contribute to the heritage significance of the borough and ought to be itemised in this section. The AHAP's and CSAI's are currently under review and revision by Surrey County Council. 	
<p>The policy places too much emphasis on enhancement and development. The emphasis should be on protection and preservation.</p> <ul style="list-style-type: none"> • This implies that the assets in the borough are in a state of general decay which is incorrect. • Enhancement could lead to the opposite of the intention of the policy • The policy places too much emphasis on development, and not preservation for the sake of preservation • Ripley conservation area does not need enhancing • The policy should set out very clearly and strictly how enhancement will improve the environment/heritage assets • NPPF 126 and 131 require a positive strategy for the conservation and enjoyment of the Historic Environment and recognise Heritage assets as an irreplaceable resource and conserve them in a manner appropriate to their significance. The Policy 12 Box should state development should be restricted in proximity to heritage assets, in accordance with NPPF clauses: 132, 126 and 133. “Where a proposed development will lead to harm or to total loss of significance of a designated heritage asset, local planning authorities should refuse consent unless it can be demonstrated that the substantial harm or loss is necessary to achieve exceptional public benefits that outweigh that harm or loss”. • The sentence ‘We will support development that recognises, protects and enhances the borough’s distinctive heritage and landscape assets, character and their settings, and will seek to ensure that it makes a positive contribution’ should be removed 	<p>The role of the historic environment in achieving sustainable development is set out in national policy, this is a strategic policy that will be used to ensure that we will support development that will conserve and where appropriate enhance heritage assets.</p> <p>The supporting text refers to the requirement for a positive strategy for conservation and enjoyment of the historic environment and sets out the steps that the Council will take towards this is paragraph 4.139.</p>

Issue	Guildford Borough Council Response
<p>The plan proposes Conservation Area appraisals/we will review our conservation areas and consider new ones. This should be done before the plan is drawn up and used to inform the site selection process. It is not possible to consult on this policy until this evidence is included.</p> <p>Potential gaps in the evidence and how these might be addressed. A wide and inclusive source of evidence for a complete picture of the historic environment, its condition and its needs are understood.</p> <p>No development should take place or be considered viable in any of these areas pending such a detailed Conservation Area study.</p> <p>There are several Conservation Areas in the ward – the largest being Ripley Village itself. There are 49 Listed Buildings in Ripley, 29 in Ockham and 6 in Ripley. Despite this no assessment of the heritage assets in Ripley Ockham and Wisley has been completed. This is contrary to the requirements of The Listed Building and Conservation Areas Act 1990 and NPPF para 126 and 132.</p> <p>The appraisals should be done in consultation with local communities</p>	<p>This is an ongoing process, conservation areas are designated separately from the local plan process.</p> <p>The Heritage Topic Paper will include a broad assessment of Guildford Boroughs heritage and the Council will look to undertake a separate programme of writing conservation area appraisals.</p>
<p>Support the policy:</p> <ul style="list-style-type: none"> • Fine houses, listed buildings and landscape make the area attractive • Must create monuments for the future • Tourists are attracted because of our assets 	<p>Support noted.</p>
<p>The policy does not protect villages in the Green Belt or the Green Belt.</p>	<p>The policy will apply to all heritage assets equally. If the plan is adopted development will be assessed against all relevant policy including those specifically addressing the green belt.</p>
<p>The policy should rule out the proposed development at Wisley /the Wisley proposal should take account of local heritage</p> <ul style="list-style-type: none"> • there are many historical assets and a conservation area nearby • extra traffic will damage historical buildings in Ripley 	<p>All schemes will be assessed against the policy if the plan is adopted.</p>
<p>Special consideration should be given to the settlement Hierarchy of Villages that has a Conservation area. If an ancient village settlement Hierarchy is intact this should afford the Village extra protection from development within its setting.</p>	<p>This is out of the scope of this policy which looks at the historic environment. There are existing Local Plan 2003 policies which protect the setting of conservation areas.</p>
<p>Conservation Areas should remain washed over by Green Belt and not inset as this affords an extra level of protection, especially when developments on the edge of conservation areas could harm the setting of the heritage asset. Conservation area</p>	<p>These are two different designations, this policy does not address Green Belt issues which are dealt with in policy 10. The NPPF states villages which do not make an important contribution to the openness of the Green Belt should be excluded and</p>

Issue	Guildford Borough Council Response
protection should not be used to mitigate for the loss of Green Belt protection.	the character of the village protected by other means, such as conservation area or normal development management policies.
The policy needs to be cross referenced with other parts of the plan as protecting and enhancing historic environment should be a key strand of the plan. It is not clear whether the policy is compatible with other parts of the plan (compatible with the economic, social and environmental policies in the draft Plan)/the policy is not compatible with the growth proposed in the plan.	This policy is one of many in the plan, development will be assessed against all relevant policy.
<p>The policy should also preserve visibility of historic and cultural sites and ensure that views of assets are retained</p> <ul style="list-style-type: none"> • The view of the cathedral from the top of Bright Hill and Harvey Road • The heights of developments affecting key views should be limited 	The supporting text makes reference to the setting of heritage assets which will include views.
<p>The policy needs rewriting</p> <ul style="list-style-type: none"> • The wording is repetitive • Para 4.136 is superfluous and does not need the words "businesses and visitors to the borough" at all • Repeated references to visitors are unneeded • 4.137 and 4.138 duplicate the message • In para 139 it is not clear what the words 'Delivering Development Document' are referring to. • It is not clear whether the supporting text is intended to supply a list of heritage assets as with the 2003 Local Plan. 	<p>The policy has been substantially re-written to remove superfluous wording and ensure clarity.</p> <p>The supporting text will not supply a list of heritage assets, these are all available on the council's website.</p>
The Conservation Areas at Effingham and Little Bookham form a single area of historic character. Evidence included in the Little Bookham CA should apply at Effingham, which includes placing value on rural setting, character, views across open fields and natural and built rural features and the policy should prohibit this type of development.	The setting of historic assets is addressed in the policy, the contribution the setting makes to the significance of the heritage asset will be considered and taken into account during the planning process.
The policy should be clearer on what is being conserved and what isn't. In the past, historic preservation policy has been applied in a blanket fashion to cover things that aren't worth preserving.	The policy refers to conserving heritage assets in a manner appropriate to their significance. The significance of the individual heritage assets will be assessed during the application process and applicants should produce a statement of significance to accompany any application affecting a heritage assets
It is unclear why the historic centre of Guildford merits greater attention and the historic villages which have been almost unchanged since their entries in the Domesday book are not worthy of notice.	The policy does not differentiate between heritage assets situated in a town and those situated in a village. It will apply equally to all of the boroughs heritage assets.
The Historic Environment Record alone is unlikely to provide an effective monitoring indicator for Policy 12. The number of acceptable heritage statements and	Agreed, we have expanded the monitoring indicators for the policy.

Issue	Guildford Borough Council Response
archaeological assessments submitted should be added as indicators to provide a more accurate appraisal of the success of the policy.	
<p>Borough appears to have taken no account of the historic importance of Normandy. It is clear from the information Normandy PC provided in the consultation in September 2013 that there are clear sites of settlement from Roman times throughout Normandy/Flexford and there is presently a site under excavation near Bailes Lane/Flexford which is being evaluated by the Guildford Museum and the Surrey Archaeological Society.</p> <p>Normandy is a settlement of 6 hamlets, too dispersed to warrant the designation of a conservation area but they nevertheless in order to maintain their importance need to have the benefit of their Greenbelt setting preserved. There are 22 Grade 11 listed buildings of mainly C16th origin and 2 sites of important archaeological note relating to Romano British settlements.</p> <p>The Parish Council consider that it's possible a conversation area could be declared for Normandy Common. Similarly the borough Council may wish to consider the further level of conservation for the flax pond which is SNCI but also of historic interest.</p>	<p>This is a strategic policy aimed at ensuring that the borough's historic environment is conserved and enhanced. We recognise that there are many heritage assets in the settlement of Normandy, these and their settings will be protected through this policy.</p> <p>Conservation area designation is a separate process to the local plan.</p>
The Council should use the local plan process to signal our desire to house Surrey collections eg the archaeological collections, extending the role we play within Surrey as a cultural centre and enjoying the tourist benefits that would bring.	This is outside the scope of this policy.
No assessment of the heritage has been completed	The Heritage Topic Paper will include a broad assessment of Guildford boroughs heritage.

Comments on Policy 13: Economic Development

Issue	Guildford Borough Council Response
Consider the historic character when delivering new economic growth – risk harming the economy by developing business estates in the countryside.	The character of an area including designations such as conservation areas and listed buildings will always be considered as part of determining any planning application. All applications are expected to show good design.
<p>Local need;</p> <ul style="list-style-type: none"> • Policy emphasises economic growth rather than meeting local need • Local Plan should consider local opinion - population has not given a 	The level of new employment floorspace will be calculated from the need generated by the anticipated growth in jobs. It is based on the Objectively Assessed Need (OAN) and not aspirational growth. The need has been assessed by consultants AECOM who produced the Employment Land Needs Assessment (ELNA),

Issue	Guildford Borough Council Response
mandate to the Council, to expand Guildford Borough by 10,900-14,800 additional B class jobs	published in Sept 2015. The mean average of three economic forecasts of the number of employees in the borough was translated into the need for floorspace by AECOM using recent trends.
Does not consider the social and environmental aspects of sustainability	<p>The Guildford Local Plan is required by the NPPF to promote sustainable development through the balancing of social, environmental and economic considerations to achieve the best overall outcome. This is done through assessing the Local Plan documents at each stage of their preparation to consider potential social, environmental and economic impacts. This process, and the resulting report, is called the Sustainability Appraisal (SA).</p> <p>SA incorporates Strategic Environmental Assessment (SEA) which is also required by law. SEA assesses potential significant environmental impacts of the plan being prepared, and where needed may recommend mitigation measures.</p> <p>The sustainability appraisal (SA), incorporating the strategic environmental assessment (SEA), and a non-technical summary of the SA, which accompanied the 'Draft Local Plan: strategy and sites 2014' can be viewed on the Council's website. A further SA of the 'Proposed Submission Local Plan: strategy and sites' will be published on the website to accompany the main document.</p>
Draft LP needs to more explicit in its definition of the types of business being targeted and why the sites allocated should be suitable for the targeted sectors	<p>The Employment Land Needs Assessment (ELNA), published in Sept 2015 identified the need for new employment floorspace. The need is split between office/research and development (use class B1a and B1b) and industrial/warehousing and storage which includes use class B1c, B2 and B8.</p> <p>In planning policy terms permission can only be granted by use class (B1a, B1b, B1c, B2 and B8), we are unable to specify in any more detail the type of business (apart from on the Surrey Research park extension where uses must be complementary to the activities of the University of Surrey).</p>
The Local plan needs to be more positive and enabling toward the rural economy without urbanising areas	An additional policy has been added on the rural economy.
Clarity over types and size of provision	<p>The 'Proposed Submission Local Plan: strategy and sites' now includes five policies on employment rather than one so provides further detail. The need for floorspace for office (B1a) and research & development (B1b) uses is now set out in sq m, the strategic sites are broken down by type and there are specific policies for the rural economy and Surrey Research Park.</p> <p>Policy E1 requires a range of types and sizes of new premises.</p> <p>It is not possible to provide detail on the sizes of units specifically required as these will vary by business and over the plan period.</p>
<p>Green belt/AONB:</p> <ul style="list-style-type: none"> • No encroachment into the green belt until all brownfield used • No green belt loss in any circumstance 	<p>Our spatial hierarchy prioritises brownfield land. With employment, Our first priority will be to intensify use on exiting employment sites where possible. There is not, however, sufficient brownfield land to meet identified needs over the plan period.</p> <p>The NPPF attaches great importance to the protection of the Green Belt and</p>

Issue	Guildford Borough Council Response
<ul style="list-style-type: none"> The Local Plan intends aggressive development over large areas of land which will affect not only those areas but also will have a serious impact on the views into and out of the AONB and National Trust land, and so will have a serious impact on tourism – one of our most vibrant industries – and on the film sector (another). 	<p>boundaries should only be altered in exceptional circumstances through the plan-making process. We consider there are exceptional circumstances however we have only proposed to remove land from the Green Belt that would not harm the main purposes of the Green Belt.</p> <p>The 'Proposed Submission Local Plan: strategy and sites' includes policies to protect the Surrey Hills AONB and to support the leisure and visitor experience.</p>
Protect/ promote small community businesses/ rural economy	An additional policy has been added on the rural economy.
Doesn't account for the growth in home working which would mean less land need	The Employment Land Needs Assessment (ELNA) methodology has changed from the previous version. In the 2015 ELNA, AECOM have used recent trends in the relationship between change in employee numbers and change in employment floorspace. This will take into account changes to more flexible working.
Need better infrastructure in rural areas i.e. broadband	An additional policy has been added on the rural economy which includes a reference to broadband in rural areas.
Housing is prioritised over and at the cost of business	The Local Plan seeks to meet the Objectively Assessed need (OAN) for employment floorspace, housing and retail. Each OAN has been identified through evidence (Employment Land Needs Assessment (ELNA), Strategic Housing Market Assessment (SHMA) and the Retail and Leisure Study. The Local Plan seeks to meet these needs on the sites identified for development. Enough land has been identified to meet housing, employment and retail/leisure needs. One type has not been prioritised over another.
ELA 2014 not been published, policy not based on any evidence	The 2014 ELA had not been published. The floorspace figures in the Reg 19 Local Plan are based on the Employment Lands Needs Assessment which was published in October 2015. It is available on the website.
New employment land should be located in areas of deprivation	New employment land has been located on the most suitable sites in accordance with our spatial hierarchy. Sequential test for B1 uses. B2 and B8 existing industrial estates, followed by the identified sites.
Has no regard to valuable London commuters	Commuting patterns have been taken into account in the economic forecasts and population projections.
The number of houses make everything unsustainable.	The number of homes has been considered through the Sustainability Appraisal (SA).
Should build on car parks and make sure new development provides underground car parking	The Land Availability Assessment has considered a large number of sites for development in the plan period. The role of the Local Plan is to balance the needs for many land uses including residential, employment, retail and leisure. Car parks will still be needed to meet the needs of shoppers and those working in the town who choose to travel to the town centre by car. Not all locations are suitable for underground parking. Such a requirement could also affect the viability of developments. The Local Plan could not require

Issue	Guildford Borough Council Response
Should encourage smart working	<p>developments to do this.</p> <p>It is beyond the scope of the Local Plan to promote smart working. It is up to individual businesses to use working styles that suit them and their employees.</p> <p>The new policy E5 Rural Economy sets out the Council's commitment to work with Surrey County Council and the Enterprise M3 LEP to support the provision on internet services where needed in rural areas.</p>
Can't say how many jobs when the housing number is flawed.	Please refer to the evidence base in appendix C.
Policy stems from a corporate plan which wasn't subject to public scrutiny	The level of new employment floorspace has been calculated from the need generated by the anticipated growth in jobs. It is based on the Objectively Assessed Need (OAN) and not aspirational growth. The need has been assessed by consultants AECOM who produced the Employment Land Needs Assessment (ELNA), published in Sept 2015. The mean average of three economic forecasts of the number of employees in the borough. AECOM then translated this into the need for floorspace using historic trends.
New employment cannot be supported by the current infrastructure/not clear how infrastructure would be provided.	<p>The recently published Transport Strategy and when published the Infrastructure Delivery Plan (IDP) will set out how the infrastructure will be provided to support the development set out in the Local Plan.</p> <p>See policy 17 Infrastructure and delivery for further details.</p>
Walnut Tree Close and Woodbridge Meadows should be included here.	<p>Woodbridge Meadows has been protected as one of the borough's strategic employment sites in both the 2014 Draft Local Plan and the 2016 Proposed Submission Local Plan.</p> <p>Walnut Tree Close has not been protected as a strategic employment site due to the changing nature of the area.</p>
<p>Woodbridge Meadows/town centre should be used for residential/mixed use not retail</p> <p>Town centre should be used for housing instead</p>	<p>Woodbridge Meadows has been protected as one of the borough's strategic employment sites in both the 2014 Draft Local Plan and the 2016 Proposed Submission Local Plan.</p> <p>The town centre has a defined employment core which has been protected as one of the boroughs strategic employment sites in order to meet existing and future needs. Other areas of the town centre will be protected as retail. There will also be a significant amount of residential development in the town centre.</p>
Clandon Golf Course should be included for employment allocation - part of the mixed use allocation	Clandon Golf Course is not been taken forward as a site in the plan. For more information please see the LAA.
Question need for more employment land – sufficient quantity and range to meet local needs	The level of new employment floorspace has been calculated from the need generated by the anticipated growth in jobs. It is based on the Objectively Assessed Need (OAN) and not aspirational growth. The need has been assessed by consultants AECOM who produced the Employment Land Needs Assessment (ELNA), published in Sept 2015. The mean average of three economic forecasts of the number of employees in the borough. AECOM then translated this into the

Issue	Guildford Borough Council Response
Impact on congestion	<p>need for floorspace using historic trends.</p> <p>The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'. Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Transport Strategy and IDP may therefore be updated to include these.</p> <p>As planning applications are considered for the sites identified in the new Local Plan, additional transport schemes to address site access and other localised issues may be secured.</p>
<p>More emphasis on high skilled employment and what we want in the borough</p> <p>The nature of use class that is being suggested is too low skilled</p>	<p>Part of the need will be met through a 10/11ha extension (approx. 35,000 sq m) which will be protected for business use comprising offices, research, development and design activities, in any science, including social science, falling within Use Classes B1 (a), (b) and (c) that is complementary to the activities of the University of Surrey. This will provide more skilled employment opportunities in the borough.</p>
<p>More emphasis on entrepreneurship</p>	<p>Encouraging entrepreneurship is beyond the scope of the Local Plan</p>
<p>Too much warehousing/ located in GB</p> <p>Fails to suitably protect the green belt or consider environmental constraints.</p> <p>More emphasis on reuse and intensification rather than new</p> <p>We don't need more land we can use what we already have</p>	<p>The level of new employment floorspace has been calculated from the need generated by the anticipated growth in jobs. It is based on the Objectively Assessed Need (OAN) and not aspirational growth. The need has been assessed by consultants AECOM who produced the Employment Land Needs Assessment (ELNA), published in Sept 2015. The mean average of three economic forecasts of the number of employees in the borough. AECOM then translated this into the need for floorspace using historic trends.</p> <p>Sites have been identified through the Land Availability Assessment (LAA). Due to high land prices and the need for access for large vehicles it is not viable or always appropriate to locate warehousing in the town centre. The Local Plan has identified sites on previously developed land before the Green Belt but there has simply not been enough land for all of the needs identified without using Green belt.</p>
<p>Not enough jobs – support the policy</p>	<p>Support noted.</p>
<p>Reference needs to be made to early delivery - due to backlog of economic need</p>	<p>The five employment policies do not seek to phase the delivery of employment land. The market will be able to deliver the sites when needed to meet demand.</p>
<p>Targets are too high for both jobs and land</p>	<p>The level of new employment floorspace has been calculated from the need generated by the anticipated growth in jobs. It is based on the Objectively Assessed Need (OAN) and not aspirational growth. The need has been assessed by consultants AECOM who produced the Employment Land Needs Assessment</p>

Issue	Guildford Borough Council Response
	(ELNA), published in Sept 2015. The mean average of three economic forecasts of the number of employees in the borough. AECOM then translated this into the need for floorspace using historic trends.
More jobs will mean more houses - object	The West Surrey SHMA has been prepared in accordance with national policy and guidance, and we consider represents a robust analysis of our OAN. In line with national planning policy the economic forecasts have been taken into account by the SHMA.
Inclusion of strategies to encourage business creation rather than relocation	The revised policy E1 states: <i>We will:</i> <ul style="list-style-type: none"> • <i>support the retention, creation and development of small local business by encouraging a range of types and sizes of new premises including incubator units, managed workspace and serviced office accommodation.</i>
More local jobs will not prevent commuting	Comment noted.
Growth will deter investment	Disagree.
Doesn't comply with the NPPF paras 7, 8 and 10, 13, 17, 18-22 (sustainability/green belt etc.) The policy does not demonstrate sustainable economic growth in line with NPPF para 8	The Local Plan is required to comply with the NPPF. If it does not comply then the Plan will not be found sound at examination.
The growth vision does not reflect the community wishes Growth agenda is too aggressive Ambition in the Economic Strategy is not sufficiently reflected in the Draft Local Plan Guildford is an EM3 growth town and there is not enough emphasis on this.	The level of new employment floorspace has been calculated from the need generated by the anticipated growth in jobs. It is based on the Objectively Assessed Need (OAN) and not aspirational growth. The need has been assessed by consultants AECOM who produced the Employment Land Needs Assessment (ELNA), published in Sept 2015. The mean average of three economic forecasts of the number of employees in the borough. AECOM then translated this into the need for floorspace using historic trends. We are seeking to meet identified needs not a growth vision.
Why are we protecting strategic employment sites for employment when there is a need for housing?	The Local Plan is required to meet the Objectively Assessed Need (OAN) for both housing and job numbers. Land is needed for both uses.
Brownfield land undermines economic progress. Need new greenfield sites.	The 'Proposed Submission Local Plan: strategy and sites' includes allocations for employment floorspace on greenfield sites at Burnt Common, Blackwell Farm and Gosden Hill.
Support for all employment land allocations and jobs figure. The borough needs to maximise and strengthen its position.	Comment noted.
Need to consider a more 'green economy' too	This is addressed in policy D2: Sustainable design, construction and energy of the Local Plan (Reg 19).
LEP are pro developer and unelected body who should have no input into the process.	Comment noted.

Issue	Guildford Borough Council Response
Broadford Business Park	We acknowledge there was some confusion regarding Broadford Business park in the 2014 Draft Local Plan. In the 'Proposed Submission Local Plan: strategy and sites' the site is allocated for residential development.
Land should be made available for agricultural use not consistently lose it to warehousing and industrial uses	Paragraph 112 of the NPPF directs Local Planning authorities away from the best and most versatile agricultural land and to "use areas of poorer quality land in preference to that of a higher quality". This has been considered through the Sustainability Appraisal process.
Policy should be more closely related to the leisure and tourism sector and town centres	Many elements and topics within the Local Plan are interrelated. The Local Plan should always be read as a whole document as we aim to keep the policies concise and avoid repetition.
Policy should recognise that alternative employed uses can complement existing business functions	Comment noted.
Policy is insufficiently detailed to enable the Council to ensure enough to the right kind of employment space is made available in the right places	<p>The single policy on employment has been extended to five policies which address:</p> <ul style="list-style-type: none"> • Sustainable employment • Location of new employment floorspace • Maintaining employment capacity and improving employment floorspace • Surrey Research Park • Rural economy
<p>GVA:</p> <ul style="list-style-type: none"> • Wealth and prosperity is not reflective of large industrial growth but more skilled employment and provision • The policy should prioritise certain types of business according to GVA • Disappointing that the policy does not set out explicitly to prioritise or deliver an increase in Gross Value Add (GVA) from the allocation of scarce resources. • Should have some measure of employment density and GVA should be targeted through the policy. 	The level of new employment floorspace has been calculated from the need generated by the anticipated growth in jobs. It is based on the Objectively Assessed Need (OAN) and not aspirational growth. The need has been assessed by consultants AECOM who produced the Employment Land Needs Assessment (ELNA), published in Sept 2015. The mean average of three economic forecasts of the number of employees in the borough. AECOM then translated this into the need for floorspace using historic trends.
Policy makes no mention of a reduction in business rates to support small, local businesses.	Business rates are beyond the scope of the Local Plan.
We don't need more people, homes, employment land to generate more wealth	The Local Plan seeks to meet the Objectively Assessed need (OAN) for employment floorspace, housing and retail. Each OAN has been identified through evidence (Employment Land Needs Assessment (ELNA), Strategic Housing Market Assessment (SHMA) and the Retail and Leisure Study. The aim of the Local Plan is to meet the identified needs in the borough.
What is our vision for Guildford? Does this policy match it?	A vision for the borough is set out in chapter three of the 'Proposed Submission Local Plan: strategy and sites'

Issue	Guildford Borough Council Response
<p>Growth in the borough:</p> <ul style="list-style-type: none"> • Growth should be constrained in the south east and pushed further north which would benefit from the economic stimulus. • Further development should be directed North of the Country and to undesirable locations 	<p>This is an issue for central government and is beyond the scope of the Local Plan.</p>
<p>Out of town employment allocation is a thing of the past and therefore no land should be allocated for employment away from urban centres</p>	<p>One of the role of the Local Plan is to identify enough land which is suitable, available and viable to meet the identified needs. Our preference for allocating sites is always to use previously developed land first. The Plan applies a sequential approach for main town centre uses which includes office. However, there are a limited number of sites available for employment uses within the town centre. Sites have been allocated elsewhere either as an extension to the existing Surrey Research park or as part of mixed-use development.</p>
<p>The Council should be building on its own town centre sites</p>	<p>Please see policies A1-A12 of the Local Plan Reg 19 for site allocations for town centre sites which include sites owned by the Council.</p>
<p>Disagree that we should be providing employment land to more than just the current population (NPPF para 18-20)</p>	<p>The level of new employment floorspace has been calculated from the need generated by the anticipated growth in jobs. It is based on the Objectively Assessed Need (OAN) and not aspirational growth. The need has been assessed by consultants AECOM who produced the Employment Land Needs Assessment (ELNA), published in Sept 2015. The mean average of three economic forecasts of the number of employees in the borough. AECOM then translated this into the need for floorspace using historic trends. We are seeking to meet identified needs not a growth vision.</p>
<p>Local Plan should adopt a flexible approach to management of employment land to avoid the protection of employment sites that are no longer viable and promotes flexibility in the range of acceptable uses</p>	<p>The Local Plan is required to comply with the NPPF. Paragraph 22 of the NPPF states <i>“Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose”</i>. The Land Availability Assessment (LAA) identified various employment sites which are being proposed for other uses, particularly residential.</p>
<p>What about the outcome of the Davies Commission (due Q2/3 2015) and the effect Gatwick and Heathrow airports have on the borough</p>	<p>The level of new employment floorspace has been calculated from the need generated by the anticipated growth in jobs. The need has been assessed by consultants AECOM who produced the Employment Land Needs Assessment (ELNA), published in Sept 2015. The mean average of three economic forecasts of the number of employees in the borough. AECOM then translated this into the need for floorspace using historic trends. Using an average of three forecasts is believed to give an accurate picture of what is likely to happen over the plan period.</p>
<p>There needs to be more preamble relating to the role of the M3 LEP, especially more detailed information on growth deal projects for the area.</p>	<p>Enterprise M3 LEP is referenced in paragraphs 2.33, 4.4.3, 4.4.12, policy E5, 4.4.54 and two of the EM3 strategies are key evidence for policy E1.</p>
<p>The value of the university should be given greater prominence - viewed in context</p>	<p>A policy has been added regarding the Surrey Research park.</p>

Issue	Guildford Borough Council Response
of its net benefit	
Guildford already has a low unemployment rate, therefore we should redirect business growth elsewhere.	The level of new employment floorspace has been calculated from the need generated by the anticipated growth in jobs. The need has been assessed by consultants AECOM who produced the Employment Land Needs Assessment (ELNA), published in Sept 2015. The mean average of three economic forecasts of the number of employees in the borough. AECOM then translated this into the need for floorspace using historic trends. The Local Plan seeks to meet the identified needs.
No 'exceptional circumstances' have been demonstrated to support the allocation of employment land in the green belt	Please refer to the table for policy 10.
Guildford is not the place for space hungry employment sites and there should be a distinction between wanting to increase added value and physical expansion.	The employment floorspace need has been updated as part of the 2015 Employment Land Needs Assessment (ELNA). The requirements are significantly lower than in the previous draft and include 4.7 – 5.3 ha of land for B1c, B2 and B8 use.
<p>Policy should be amended to explicitly clarify that A1, A2, C1, D2 or sui generis uses are considered to be employment uses which can positively contribute to employment provision.</p> <p>A2 uses which require more highly skilled workers are more appropriate for Guildford than low skilled jobs in which workers wouldn't be able to afford to live</p>	The Employment Land Needs Assessment (ELNA) and revised policies E1 to E4 define employment use as that which falls into use classes B1, B2 and B8 of the use classes order 1987 (as amended). The reasoned justification is now more specific. Although all of the use classes listed provide employment they are addressed in other evidence and policies.
The Corporate Plan was released just as the Issues and Options consultation was ending so in practice it has not been available to residents for formal consultation	Consultation on the Corporate Plan is not covered by the same regulations as the Local Plan. It was not produced by the Planning Policy team.
<p>The council should assess and make appropriate provision for:</p> <ul style="list-style-type: none"> • Existing employers wishing to relocate; • The need for expansion of existing business, and • Employment sites that may be displaced through redevelopment 	<p>The level of new employment floorspace has been calculated from the need generated by the anticipated growth in jobs. The need has been assessed by consultants AECOM who produced the Employment Land Needs Assessment (ELNA), published in Sept 2015. The mean average of three economic forecasts of the number of employees in the borough. AECOM then translated this into the need for floorspace using historic trends.</p> <p>The Local Plan (reg 19) contains five policies on employment floorspace, rather than one in the Draft Local Plan.</p>
Draft Local Plan is out of touch with today's buying patterns and work patterns – online shopping	Please refer to the Guildford Retail and Leisure Study 2014 update.
Good broadband connection should play a greater role in homecare - noncontact medical consultations, home care management and diagnostics and even post-care hospital treatment. All would create greater capacity within our healthcare system and save money.	New policy E5: Rural economy includes reference to the need for improved broadband in certain areas of the borough.
Guildford Borough Council needs to consider Waverley Borough Council	The 'Proposed Submission Local Plan: strategy and sites' seeks to meet the Objectively Assessed need (OAN) for employment floorspace, housing and retail. Each OAN has been identified though evidence (Employment Land Needs

Issue	Guildford Borough Council Response
	Assessment (ELNA), Strategic Housing Market Assessment (SHMA) and the Retail and Leisure Study. The ELNA is based on the Functional Economic Market Area and the SHMA on the Housing Market Area, both which cover Woking, Waverley and Guildford Boroughs.
Normandy and Flexford cannot provide employment opportunities at 100 as your table suggests	The Local Plan (reg 19) no longer allocates any employment sites in Normandy and Flexford.
Object to Blackwell Farm being a strategic site	Please refer to Planning for Sites site 60
Process is undemocratic – LP final form, never being released for consultation to residents and businesses	The Local Plan has been through consultation in 2013 (Issues and Options) and 2014 (Draft Local Plan). There will be further consultation in summer 2016 on the 'Proposed Submission Local Plan: strategy and sites' (reg 19).
<p>Slyfield: Slyfield Industrial Estate to expand MUST have:</p> <ul style="list-style-type: none"> • a 2nd road in/out – too much congestion in Worplesdon currently • A four-way junction at Burpham on the A3 • A larger than planned northern expansion for 'B' uses • A clear bunded woodland separation from Jacobs Well • A new Park & Ride facility for workers and shoppers • A new SANG area to comply with SPA rules • Public Transport corridor linking to the town centre • Ancillary facilities for convenience and hospitality 	<p>Neither the Clay Lane Link Road scheme nor a Northern Park and Ride scheme are considered not to be a key infrastructure requirement on which the delivery of the 'Proposed Submission Local Plan: strategy and sites' depends. Nevertheless, both are 'aspirational' schemes in the Council's Guildford Borough Transport Strategy (April 2016). An 'aspirational' status has been defined as 'A strong business case will need to be demonstrated in order to secure funding as the estimated cost presently exceeds typical funding envelopes and/or there are significant planning and statutory approvals to be achieved.'</p> <p>The Government's Road Investment Strategy (March 2015) mandates Highways England to improve the existing A3 Guildford from the A320 Stoke Interchange to the A31 Hog's Back junction with the A31, with associated safety improvements. In announcing the Road Investment Strategy in December 2014, the Government described the improvement as involving the widening of the carriageways. The A3 Guildford scheme is now being planned by Highways England. Highways England is also investigating an alternative option of an A3 Guildford tunnel, with the existing road detrunked and retained for local traffic movements. Highways England is not considering re-rerouting the A3 trunk road and has not indicated that it is considering a new four-way A3 junction at the A320 Stoke Interchange.</p> <p>The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'. Several schemes are included that will address access and transport issues in this area including SRN1, SRN2, SRN9, LRN8, SMC5, AM2 and AM3.</p>

Issue	Guildford Borough Council Response
	<p>Provision of green space for landscaping (including screening) will be considered as part of any scheme.</p> <p>Commercial developments do not require SANG. The Proposed Submission Local Plan proposes adequate SANG mitigation for SARP .</p>
Draft LP does not list as part of its Evidence Base the Draft Economic Strategy 2013, despite referring to it at 4.144.	This omission has been corrected.
Should have more traditional industries and discourage large facilities as they employ few people	Unclear what is meant by “traditional industries”.
Policy fails to capitalise on the Industry Clusters and fails also to protect them and enable them to grow	<p>Some of the borough’s key clusters are located within the Surrey Research park. We have added a new policy which protects the existing uses on the Park and ensure the new 10/11ha (35,00 sqm) extension is protected for “offices, research, development and design activities, in any science, including social science, falling within Use Classes B1 (a), (b) and (c) of the Town and Country Planning (use Classes) Order 1987 (as amended), that is complementary to the activities of the University of Surrey”.</p>
The proposed retail expansion in the town centre is not ' mentioned as part of the Economic Development policy and surrounding paragraphs	Policy title has now been amended to “employment” which more accurately reflects the uses classes it addresses. Retail is addressed by the policies E7, E8, E9 of the ‘Proposed Submission Local Plan: strategy and sites’.
Whether the employment numbers have included or excluded new retail jobs	<p>The Employment Land Needs Assessment (ELNA) and revised policies E1 to E4 define employment use as that which falls into use classes B1, B2 and B8 of the use classes order 1987 (as amended). The reasoned justification is now more specific. Although all of the use classes listed provide employment they are addressed in other evidence and policies.</p> <p>The Strategic Housing Market Assessment uses the total number of new jobs in the borough, not just those within B classes.</p>
Have affordable housing projections taken into account the likelihood of many of these new shop workers being on wages not significantly higher than the Minimum Wage	The SHMA estimates both existing households and newly forming households that will fall into affordable housing need over the lifetime of the plan to 2033.
<p>Policy does not explicitly seek to tackle skills gaps highlighted in LSOAs</p> <p>Haven’t targeted measures to solve issues of the challenges in terms of skills, income and employment</p>	<p>The policy focuses on the location, amount and quality of employment floorspace needed to meet needs over the plan period.</p> <p>The Corporate Plan (2015-2020) includes outcomes and actions to address skills shortages. The will be implemented via the Local Economy Manager.</p>
Sufficient separation needs to be established between employment and housing areas - would be likely to result in further land take	Each identified site will require planning permission before it can be developed. This will include consideration of issues such as design and separation.
Insufficient land is available for a sustainable new settlement / smaller than originally quoted /not in accordance with GBCS	Please refer to the evidence base in appendix C and to the responses in the planning for sites section.
Henley Business Park:	Henley Business Park already has a mixture of outline and full planning permission

Issue	Guildford Borough Council Response
<ul style="list-style-type: none"> • Henley provides very few local jobs and is only accessible by car. It produces lots of air pollution, affecting the nearby species • Henley Business Park provides an opportunity for local employment and possibly specialist housing given the correct mix with appropriate sensitivity towards the SSSI/SPA 	<p>for further development. The Local Plan can not change existing planning permission. The site does not contribute to the openness of the Green Belt so has been inset.</p> <p>Policy E1 and E3 seek to protect the boroughs Strategic Employment Sites for employment use. Many town centre employment sites have already been lost to housing. The Local Plan does not identify Henley Business Park as suitable for specialist housing.</p>
<p>There are not enough opportunities for people mid-career</p>	<p>Providing specific career opportunities is beyond the scope of the Local Plan.</p>
<p>More support for hospital</p>	<p>The Local Plan is supporting the Royal Surrey County Hospital through the allocation of sites A16 and A17. Site A16 is allocated for the redevelopment of existing staff/student accommodation for C3 housing and site A17 for the redevelopment of a temporary staff car park for hospital related development, which can include staff (nurse/junior doctor etc) accommodation. Overall infrastructure improvements such as the new rail station will help staff and patients get to the hospital. The Local Plan will provide more affordable homes in the borough which will help staff to live nearer their place of work which may aid staff retention and recruitment.</p>
<p>Too much bias on hi-tech companies, need a broader range</p>	<p>The Local Plan (reg 19) makes provision for between 4.7 and 5.3 ha of light industrial (B1c), Industrial (B2) and Warehousing and Storage (B8) uses.</p>
<p>The Draft Plan is proposing substantial uplifts on the ELA's requirements. These equate to a 51% increase on the lower baseline range figure and a 31.5% on the upper baseline range figure. Furthermore, the ELA's conclusions on the 7 sites analysed and included as suitable potential development areas, were already considered to provide over and above the required levels of new floorspace, when considered in conjunction with the existing sources of supply.</p>	<p>The previous ELA has been superseded by the 2015 Employment Land Needs Assessment (ELNA). This ELNA identifies the need for 4.7 – 5.3ha of Light Industrial (B1c), Industrial (B2) and Warehousing and Storage (B8) uses and between 37,200 sq m and 47,200 sq m of Office (B1a) and Research and Development (B1b) floorspace. These figures have been taken forward into the Local Plan (reg 19). The sites identified in the previous ELA have been superseded by those identified in the Land Availability Assessment (LAA) 2016.</p>
<p>Almost all of the new building in the next five years is planned to be on Green Belt land, even though GBC owns substantial brownfield land in the town centre. This is the Council acting as a developer and landbanking our land against the interests of residents. Why?</p>	<p>The Land Availability Assessment (LAA) 2016 and the site allocation policies (A1 – A57) identify a number of Council owned sites for development in the plan period. These include:</p> <ul style="list-style-type: none"> • North Street (GBC is freeholder) • Guildford cinema (GBC is freeholder) • Land West of Guildford railway station • Guildford car park • Bright Hill car park
<p>The planned economic development does not intend to use smart growth, with high tech broadband involving high tech homeworking; nor will it build on the technological expertise of Surrey University; but it is intended to involve a significant proportion of low tech, low margin, land hungry activities (much more retail in an era</p>	<p>We have added a new policy which protects the existing uses on the Park and ensure the new 10/11ha (35,00 sqm) extension is protected for "offices, research, development and design activities, in any science, including social science, falling within Use Classes B1 (a), (b) and (c) of the Town and Country Planning (use</p>

Issue	Guildford Borough Council Response
of declining retail; 10 hectares of new warehouse space in an area famed for congestion).	<p><i>Classes) Order 1987 (as amended), that is complementary to the activities of the University of Surrey”.</i></p> <p>The previous ELA has been superseded by the 2015 Employment Land Needs Assessment (ELNA). This ELNA identifies the need for 4.7 – 5.3ha of Light Industrial (B1c), Industrial (B2) and Warehousing and Storage (B8). These figures have been taken forward into the Local Plan (reg 19).</p>
<p>We need to get the message across to the government to re-think their relaxing of the planning laws, and also to the developers themselves, that if we think we can just build our way out of this crisis we are in we will soon be standing on each other's heads and there are other ways to promote growth and the economy. Where jobs come into it; how about jobs in agriculture, tourism, conservation, forestry, and a wealth of educational opportunities that will boost school curriculums!</p>	<p>The level of new employment floorspace will be calculated from the need generated by the anticipated growth in jobs. It is based on the Objectively Assessed Need (OAN) and not aspirational growth. The need has been assessed by consultants AECOM who produced the Employment Land Needs Assessment (ELNA), published in Sept 2015. The mean average of three economic forecasts of the number of employees in the borough was translated into the need for floorspace by AECOM using recent trends.</p> <p>The Employment Land Needs Assessment (ELNA) and revised policies E1 to E4 define employment use as that which falls into use classes B1, B2 and B8 of the use classes order 1987 (as amended). The reasoned justification is now more specific. Although all of the sectors listed provide employment they are addressed in other evidence and policies.</p>

Comments on Policy 14: The leisure and visitor experience

Issue	Guildford Borough Council Response
<p>If done well we will:</p> <ul style="list-style-type: none"> • Sustain the wellbeing of the community • Build a strong visitor economy • Support our high tech economy 	<p>These points are reflected within Policy E6 (the new name for Policy 14 of the Draft Local Plan) of the ‘Proposed Submission Local Plan: strategy and sites.’</p>
<p>The character attracts academics looking for work.</p>	<p>Comment noted.</p>
<p>Why are more accommodation areas needed- University can provide them.</p>	<p>There is a significant demand for all types of visitor and business accommodation in Guildford and the surrounding area which cannot be catered for by the University. Additional visitor and business accommodation can attract further tourists and business to the borough; providing a number of benefits to the local economy.</p>
<p>Presumption in favour of development will undermine this policy.</p>	<p>The NPPF and Local Plan promote a presumption in favour of sustainable development. Policy E6 accords with this but recognises the role that the natural environment plays in attracting visitors to the borough. Development which causes significant harm to the natural environment will not be permitted.</p>

Issue	Guildford Borough Council Response
Lack of sequential policy.	The NPPF states that Local Planning Authorities should operate a sequential approach for main town centre uses. These include leisure, entertainment and tourism facilities. Policy 14 of the Draft Local Plan (now known as Policy E6) has been updated since the consultation on the draft Local Plan to reflect the sequential approach. However, the policy also emphasises that the council will support sustainable rural tourism.
Should be re-titled "Recreation and Tourism".	Whilst the policy partly relates to recreational uses, its overriding focus is on leisure and visitor facilities. The current name will therefore remain in place.
More consultation with the organisations near the attractions.	The Council undertook an extensive public consultation exercise following the publication of the Draft Local Plan. This provided the public and local organisations with the opportunity to comment on the Draft Local Plan. The 'Proposed Submission Local Plan: strategy and sites' will also undergo a six week consultation period. Representations received from the previous consultation(s) have been utilised to revise the proposed planning policies including that formerly known as policy 14.
We would like to see new facilities in rural areas subject to stricter guidelines and suggest an additional sentence at the end of the last paragraph as follows: "New development should respect the amenities of nearby residents, be of a high standard of design, respect the character of the rural environment, and not create a significant increase in traffic movement on inadequate road networks".	Point has been noted and partly incorporated into the revised policy. The policy promotes small scale sustainable development in rural locations where any impact on the highway will be mitigated, the proposal does not harm residents amenity and the development is in accordance with Green Belt policy. It should also be noted that the policy is intended to be strategic. More detailed policies concerned with design issues will be included within the forthcoming Local Plan: Development Management Policies DPD.
Evening economy: <ul style="list-style-type: none"> • Need more evening activities, for all ages, other than pubs and clubs • Need an early evening economy too, to support TC after shops close. 	The policy supports the provision of additional leisure and recreational facilities in suitable (predominately town centre) locations. This support is inclusive of facilities and services which may boost the evening economy.
Need for leisure provision: <ul style="list-style-type: none"> • Leisure facilities are great already hence why we should leave GB alone • Doubtful that any enhancement is needed, given the borough's revenue • Not right to promote development to boost tourism • Why does this have its own section - very small part of market. 	Guildford Retail and Leisure Study Update 2014 (published 2015) concludes that there remains scope to improve the leisure offer in the borough, particularly within Guildford town centre. Additional leisure facilities can contribute to maintaining the vitality and viability of the town centre and Guildford's economic competitiveness. Concerns relating to the evidence base are responded to in greater detail in the table for Appendix C: Evidence Base. The supporting text to the policy highlights the economic benefits tourism brings to Guildford. Tourism can help enhance the borough's prosperity and maintain rural services.

Issue	Guildford Borough Council Response
Invest in farming so the borough can be sustainable.	Investing in agriculture is not a local plan matter.
Developments should reflect local needs rather than replicate existing venues Plan not designed for residents.	The protection, enhancement and provision of new leisure and visitor facilities can provide significant economic benefits to the borough and help maintain rural services. The Council believes leisure and tourism can therefore play a significant role in enhancing the prosperity of the borough and increasing residents quality of life.
Are there any set plans?	The site allocations section of the 'Proposed Submission Local Plan: strategy and sites' sets out sites allocated for development in the Plan period.
Make more of (mention) the following: <ul style="list-style-type: none"> • River Wey • AONB • Countryside • Historic Buildings • Venues • Village Pubs • Horseriding • Passive nature appreciation 	Comment noted and reflected in revised policy. The revised policy highlights the countryside's role in attracting visitors to the borough and increasing our residents quality of life. The policy also states that the council will support proposals which increase the use of the River Wey as a recreational resource.
Conference facilities no longer needed so much as businesses cut costs.	The Surrey Hotels Future Report (dated June 2015) highlights a significant need for business accommodation (including conference facilities) in the borough
Odeon area needs regenerating.	The Council's Town Centre Masterplan outlines our vision for a new and improved Guildford Town Centre. Sites which are considered to be available, suitable and deliverable (for (re)development) in the plan period are also identified in the site allocations section of the 'Proposed Submission Local Plan: strategy and sites'.
Visitor Strategy: <ul style="list-style-type: none"> • Reference to a yet to be published vision • Why is there no visitor strategy • Needs to be a visitor strategy for both town centre and rural • Reference to a yet published visitor strategy. 	Guildford Borough Council's Visitor Strategy Guide (2014-2020) was published in 2014 (after the Draft Local Plan consultation). The Guide is available to view on the council's website. The revised policy makes reference to the guide and its aims.
Attractions: <ul style="list-style-type: none"> • Policy doesn't list some of the main facilities • Promote the borough's attractions more intensely through the Plan • Should make reference to National Shooting Centre at Bisley • Continued support for Yvonne Arnaud • No mention of events such as Guilfest or Guildford Book Festival. 	The policy is not intended to provide a comprehensive list of leisure/visitor attractions or events in the borough. It provides an overview of some facilities in the borough which attract visitors or offer leisure activities. The updated policy emphasises that the Council will seek to protect existing leisure and visitor facilities in the borough.
Economy will only remain so significant if the places and sites are preserved and enhanced.	Comment noted and reflected in policy E6 and other policies of the 'Proposed Submission Local Plan: strategy and sites'. Policies throughout the 'Proposed Submission Local Plan: strategy and sites' emphasise the need for development to

Issue	Guildford Borough Council Response
<p>Writing style:</p> <ul style="list-style-type: none"> • Weakly written • “Expect” is not sufficient- should object to everything else. 	<p>respect and enhance the existing character/landscape value of the borough.</p> <p>Comments noted and addressed within the revised policy of the ‘Proposed Submission Local Plan: strategy and sites’.</p>
<p>GBC has no control over low and ultra-low emission vehicles.</p>	<p>With respect to preparing a Local Plan, this suggestion is incorrect.</p> <p>Reference to low and ultra emission vehicles has been removed from the policy.</p>
<p>Policy does not show links between:</p> <ul style="list-style-type: none"> • Guildford’s green and historical character and how we wish to preserve it • The rich cultural life of the borough and how we wish to develop it • Our economy and how we intend to grow it. 	<p>All three points are addressed within the policy or its supporting text. The policy notes the valuable contribution that tourism makes to the borough’s economy (and its future growth) and the role the built/natural environment plays in attracting visitors to the area. The policy emphasises that proposals for new or enhanced leisure/visitor facilities should respect the historical character of our borough and conserve the natural environment.</p>
<p>Significance of tourism:</p> <ul style="list-style-type: none"> • Tourism is not treated as a serious inputter to the economy • Must be treated with the same level of importance as other economic inputs • The parts of the economy that rely on environmental and cultural attributes can thrive alongside knowledge based technology if cared for. 	<p>Supporting text to the policy emphasises the role that tourism plays in Guildford’s local economy. The Council recognises how tourism can enhance the borough’s prosperity and thus seeks to support further provision in suitable locations.</p>
<p>Arts centre:</p> <ul style="list-style-type: none"> • An arts centre would be greatly appreciated- place for congregation, exhibitions, activities, performances, artistic and social hub • New and improved arts and cultural facilities should be encouraged – independent cinema, outside space used for film shows • Promote arts and culture in rural areas to prevent people travelling to Town • Need a better arts community in Guildford, linked to Surrey • Need a Lightbox equivalent • Guildford has never had good provision for visual arts • Last point should be extended to “encouraging the provision of new and improved arts and cultural facilities in our urban areas’ will both enhance life for residents and draw people in from outside.” 	<p>The policy supports the provision of new arts and cultural facilities within the borough’s urban areas. The approach is in line with the sequential test for main town centre uses described in the NPPF.</p>
<p>Guildford lacks a central meeting place such as a town square.</p>	<p>Policy E6 sets out a strategic/overarching policy for leisure/tourism development in the borough rather than proposed large physical changes to Guildford town centre.</p>
<p>Nowhere to promote what it has to offer.</p>	<p>The site allocations section of the ‘Proposed Submission Local Plan: strategy and sites’ identifies locations where leisure uses may be appropriate. For unallocated land, policy E6 now promotes a sequential approach to the development of leisure</p>

Issue	Guildford Borough Council Response
	and visitor facilities to ensure such uses are primarily directed towards our town and district centres. However, sustainable rural tourism will also be encouraged.
Developments of Guildford Museum and Castle.	The policy promotes the protection of existing leisure and visitor attractions from inappropriate development.
There needs to be repaired planning.	The policy supports the enhancement of existing facilities where the development would not have an adverse impact on the natural or built environment.
Based on an out of date survey. Figures to be checked “£300 million per annum and supports over 5,000 jobs.” This works out at £60,000 per job, should this data be checked?	Statistics provided in the supporting text are based on research published in 2014 by South East Tourism. These are the latest figures held for Guildford.
Guildford is much more than a shopping centre.	This point is reflected in policy E6 of the ‘Proposed Submission Local Plan: strategy and sites’ and the supporting text.
Disingenuous to emphasise the beauty and visitor experience, when proposing large, visible developments at Blackwell Farm and Gosden Hill Farm on the A31 Hog’s Back and A3 respectively, the two main highways.	Comments relating to site allocations are addressed within the ‘Planning for sites’ table. However, the proposed allocations are considered to represent sustainable locations for growth. Policy E6 recognises the significance of the natural environment in attracting visitors to the borough and the contribution it makes to residents quality of life. New built development must complement the natural attractions of the landscape.
<p>Transport and infrastructure:</p> <ul style="list-style-type: none"> • Visitors cannot get into town if traffic is not sorted • The attractiveness of Guildford could reduce if infrastructure deficits are not addressed • Cycling and walking routes, by which people arrive in Guildford town centre, need improving • Access from Guildford railway station to town centre is poor and turns people off • Rail routes need exploiting • Need to make the town centre a place people can access easily and stay for longer • Add improvements to sustainable transport. 	<p>The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the ‘Proposed Submission Local Plan: strategy and sites’. Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Transport Strategy and IDP may therefore be updated to include these.</p> <p>As planning applications are considered for the sites identified in the new Local Plan, additional transport schemes to address site access and other localised issues may be secured.</p>
<p>Play facilities:</p> <ul style="list-style-type: none"> • Provide safe outdoor play areas for children, to encourage healthy lifestyles • We would add: "supporting the provision of new and improved child/family oriented facilities in both urban and rural areas including outdoor and indoor play areas, gymbores, farm parks and performances." 	<p>The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure to support the planned development which is expected to place extra pressure on existing infrastructure, or to need new or improved infrastructure. The IDP will be updated as further detail on supporting infrastructure is available. Developer contributions and other funding sources will be used to ensure that key infrastructure is delivered when it is needed, including at the planning application stage.</p>

Issue	Guildford Borough Council Response
Pricing: <ul style="list-style-type: none"> • Should get attractions to team up and offer competitive rates to draw people to Guildford over traditional tourist spots • Provide low cost sports activities, to encourage healthy lifestyles. 	The pricing of leisure activities is not a function or concern of the planning system.
Should include support and protection for existing facilities and to resist their loss or change.	Point has been noted and incorporated into the revised policy for the 'Proposed-Submission Local Plan: strategy and sites'.
Leisure cyclists are leading to negative changes, do not want anymore.	Increasing access to the countryside can bring significant social and economic benefits to residents and the rural economy. This point is reflected in policy E6.
Promoting tourism: <ul style="list-style-type: none"> • Promote city break culture • What power does planning policy have in promoting tourism? 	The Local Plan can promote tourism by encouraging appropriate and sensitive development of visitor /leisure facilities, including visitor accommodation, in certain locations.
Heritage: <ul style="list-style-type: none"> • Village signs to be protected • Milestones along A246 should be protected • Heritage sites are not just in the town centre 	Policy E6 makes clear that proposals for future leisure/tourism use must respect the existing character of the borough. Development which has an adverse effect on heritage assets should be refused. The upkeep of village signs is not a matter for the Local Plan.
Conservation of natural environment: <ul style="list-style-type: none"> • Lack of development is what the attraction is to Guildford • Cycling is dependent on the countryside too • Preservation of the countryside should be the top priority • Impact on Film Industry if countryside to be developed, trout farms, watercress farms • GB is a reason lots of people visit, so shouldn't develop it • Green Belt is the main tourist attraction, not the town centre, so do not reduce it • Downton Abbey Effect- people travel to see rural English villages, not traffic jams and soulless houses • Encouraging tourism should not be done in ways that has a negative effect on the environment (historical or natural) • Duke of Edinburgh award relies on the undeveloped countryside 	Policy 14 (now named Policy E6) has been amended to reflect the significant role that the countryside plays in attracting visitors to the borough and improving residents quality of life. However, it also states that sensitive development that is of an appropriate size/scale to its location and which increases people's access to the countryside will be supported. All proposals will be expected to protect the natural environment. Whilst the council will support sustainable rural tourism, proposals should comply with national Green Belt policy.

Issue	Guildford Borough Council Response
<ul style="list-style-type: none"> • Tourists and visitors do not depend on new attractions and the environment is not enhanced by attractions • The beauty of the countryside attracts people in itself, do not need anything else • Do we have enough attractions? Having anymore will damage GB. More development needs more facilities. 	
<p>Include a list of sites that Guildford Borough Council will support the enhancement of/ creation.</p>	<p>The policy emphasises that the Council will support the retention of all leisure or visitor related facilities unless one of three criteria are satisfied. Likewise, proposals for leisure/tourism facilities which adhere to the policies of the plan and the sequential test will be supported. The Council also recognise that there is a need for more visitor and business accommodation in the borough.</p> <p>The site allocations section of the 'Proposed Submission Local Plan: strategy and sites' document identifies sites which are considered suitable for development during the plan period and appropriate uses for each.</p>
<p>Buildings in town centre need to be in keeping and not like the Friary Centre.</p>	<p>Policy six of the 'Proposed Submission Local Plan: strategy and sites' describes the Council's overarching approach to the design of new build development. Policy 14 also states that new leisure or visitor facilities will be required to respect and/or enhance the borough's built heritage.</p> <p>Comments regarding design of the built environment are responded to in greater detail in the table for policy 6.</p>
<p>Aspiration:</p> <ul style="list-style-type: none"> • Need to have artistic aspiration within the Local Plan • Shows no vision • Policy has no content. 	<p>The 'Proposed Submission Local Plan: strategy and sites' sets out a vision for the development and growth of the borough.</p>
<p>Other policies limit this one in terms of encouraging development that improves tourism.</p>	<p>The economic value the tourist and leisure experience offers the borough is acknowledged within the supporting text to Policy E6. The Local Plan attempts to encourage economic growth, including that associated with tourism and leisure, whilst ensuring that the natural and built heritage of the borough is conserved.</p>
<p>An integrated strategy for "Guildford's culture and environment: heritage and aspirations" should be developed including ecology, heritage, entertainment, retail, social, rural, sport and business tourism.</p>	<p>Many of these issues are covered within separate Council Strategies including the Visitor Strategy 2014-2020 and the Sport Development Strategy 2015-2020.</p>
<p>Indoor sports facilities should be covered and made clear they are protected from development.</p>	<p>Point has been noted and addressed in the updated policy included within the 'Proposed Submission Local Plan: strategy and sites'.</p>
<p>The development of the Pirbright Institute as an international conference centre with leisure facilities and accommodation begs the question of its purpose- contains biohazards.</p>	<p>Comments relating to specific sites are addressed in a later (site allocations) table.</p>
<p>No mention of outdoor activity, rights of way, bridle baths, beauty spots- no value of</p>	<p>The updated policy reflects upon the role of the countryside in attracting visitors and</p>

Issue	Guildford Borough Council Response
open spaces mentioned.	improving residents quality of life, making particular reference to outdoor pursuits such as rambling, cycling and horse riding.
Policy must accept some attractions (RHS Wisley) are constrained by their rural location, flexibility must be applied.	The revised policy notes that the Council will support 'sustainable rural tourism' and new accommodation in rural areas should be accessible by public transport. Policy I3 of the 'Proposed Submission Local Plan: strategy and sites' address the accessibility of development proposals. A more detailed response to such transport/accessibility is included within the table relating to Policy 18.
<p>Visitor accommodation:</p> <ul style="list-style-type: none"> • Need new accommodation as tourism is important for other aspects of wellbeing, such as culture attracting businesses to the area • Need better hotel and conference facilities to help boost businesses • If it is important to increase stock of hotels, why was one recently approved to be converted into a house 	The policy emphasises that the Council will support the provision of both new business visitor and tourist accommodation. Facilities catering for business visitors will be directed towards accessible town centre and other urban locations. Rural diversification and the re-use of suitable rural buildings for visitor accommodation will also generally be supported where they are in conformity with Green Belt policy.
Could be more done between GBC and M3 Local Enterprise Partnership (LEP) to develop the appeal of the borough to businesses.	The planning system has a limited role in attracting business to the borough. However, the Local Plan recognises the importance of, and promotes, continued economic growth. Other functions of the Council continue to work with the LEP to encourage the growth of Guildford's economy.
Agrotourism sector has been ignored e.g. Denbies.	The revised policy states that rural diversification and the re-use of suitable rural buildings for visitor accommodation will generally be supported where it does not prejudice the aims of the Green Belt.
<p>Site allocations:</p> <ul style="list-style-type: none"> • This policy is contrary to the proposed land allocations developing in the Green Belt and inseting villages that have Conservation areas or in the AONB. • How will site 66 enhance RHS Wisley? 	Comments on site allocations are addressed in the site allocation table. However, policy E6 acknowledges the role the natural environment plays in attracting visitors to the borough and increasing residents quality of life. It also supports sensitive proposals which respect the natural environment and increase people's access to the countryside.
Policy focuses on developing visitor attractions and does not give enough thought to how other developments support leisure eg if Wey is developed, set buildings back to create green space on banks.	The requirement for residential (and other) developments of a certain size to provide open space will be addressed in the second part of the Local Plan: Development Management Policies DPD and potentially by the Community Infrastructure Levy.
Enhancing existing facilities should be encouraged but only new commercially led developments should be considered.	Policy E6 encourages the enhancement and provision of appropriate new tourist and leisure facilities. However, the policy will not prejudice the type of operator of such facilities.
Guildford is one of the least appealing places to visit in the South East. A combination of over-development, appalling transport infrastructure, persistent congestion and plain mismanagement and ineptitude on the part of the council and councillors, makes it unappealing to many.	Statistics suggest that tourism is playing an increasing role in Guildford's economic growth. Policy E6, and the rest of the plan, seeks to improve the visitor experience by maintaining and enhancing the borough's natural and built assets and the infrastructure which supports it.

Issue	Guildford Borough Council Response
The Policy (14) supports economic development and will help build Guildford as a centre for the digitally based computer gaming or synthetic environments sector.	Comment noted.
<p>Retail:</p> <ul style="list-style-type: none"> • The increase in internet shopping means that the leisure aspect of shopping will become more important • No more retails proposals should be in the plan after Waitrose and North Street • Want more local shops, not chains to look like every other town • Does Guildford need any more shops, especially on North Street- hence attracting people away from historic town centre • Policy also needs to focus on High Street. 	<p>The Retail and Leisure Study Update 2014 recognises that improved leisure, and food and drink makes visits to the town centre more of an experience than simply visiting to shop.</p> <p>Following opening of Waitrose, the 2014 Retail and Leisure Study Update found very little additional need for convenience floorspace over the plan period</p> <p>There has been very little new town centre retail comparison floorspace over the last 20 years. There are no sites on the High Street that could accommodate the identified need for significant additional comparison floorspace.</p>
The connections and links between the University, Cathedral, station, riverside, High Street, castle, G-Live and other key locations need to be planned and (where necessary and appropriate) land reserved in the Local Plan to ensure the visitor experience is cohesive and attractive.	<p>The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'. Relevant schemes are LRN1, AM1, AM2 and AM3.</p> <p>If the requirements and opportunities for site allocations A15, A11, A8 and A7 are realised, there will be a pedestrian route between the Land at Guildford cathedral site to Guildford railway station via the University of Surrey's Stag Hill campus, the Guildford Park Car Park site and the Land west of Guildford railway station site.</p> <p>As planning applications are considered for the sites identified in the new Local Plan, additional transport schemes to address site access and other localised issues may be secured.</p>
There is nothing in the plan or evidence base that sets out the importance of play space. The final version of the local plan should include policies in relation to play spaces using 'Planning and Design for Outdoor Space and Play' published by the Fields in Trust in 2008.	The Council is currently updating the Open Space Sports and Recreation Study which looks at recreation provision and identifies deficits. This includes play space. The majority of play spaces are provided by the Council's Parks and Countryside team who are currently producing an updated Play Strategy.

Comments on Policy 15 Guildford Town Centre

Comment	Guildford Borough Council Response
Town Centre Vision	
The expression “build on these assets” in the draft Vision is inappropriate and could be seriously misleading	This wording is from Allies and Morrison’s town centre “Vision” and we are not able to change it
Great vision, heart of Local Plan, best formed part of the Plan Neighbouring borough developments need to be considered and their impact	Support for Vision acknowledged
Allies & Morrison Town Centre vision is a good start but not enough, and fails to fully divert traffic from river and town to open it up to pedestrians and cyclists We support the decision to create a vision but object to this Policy because it is insufficiently specific Allies & Morrison vision takes no account of the proposed expansion of the town Vision for town centre harness full economic potential	This wording is from Allies and Morrison’s town centre “Vision” and we are not able to change it
Policy 15;4.183 postulates that in view of changing consumer habits the town centre and its environs may become a focus for leisure. I am concerned that the draft Vision may impede that.	Comment noted
The Vision is unclear; what is meant by “We will invest in creating high quality public realm”	The ‘Proposed Submission Local Plan: strategy and sites’ looks to secure increased leisure in the town centre, regardless of the Vision for the town centre.
The Guildford Vision ideas for the town centre are fine in principle but there are doubts about whether they could be implemented due to the land ownership required Compulsory purchase does seem futile if, eventually, it will not be sufficient. I have some reservations about compulsory purchase under the Planning & Compulsory Act 2004 (and amendments) especially given the long-term plans for development.	The Council will invest resources to improve the public areas of the town centre
Consultation on Guildford Vision document completed before the draft Local Plan consultation, doubtful policy will deliver the vision. Allies & Morrison Vision key essential should be incorporated into draft Local Plan How is Guildford vision to be funded? requires more work to be a plan The Vision study was commission too late and too cheaply to have been of significant use and this should have been a key part of the evidence base	Sites allocated in the Local Plan must be available for development at the time specified. Some landowners of sites along the river are not available for the suggested uses. The Council may use Compulsory Purchase Powers where suitable to acquire sites for certain developments in the public interest. Whilst some elements of the town centre Vision and subsequent masterplan have been included in the ‘Proposed Submission Local plan: strategy and sites’, many of the sites and wider projects included in the Vision and Masterplan do not yet have the level of certainty needed to be included in the Proposed Submission Local Plan: strategy and sites’. Many of these are being progressed by the Council’s Delivery Team

Comment	Guildford Borough Council Response
The draft Local Plan should be amended to allow the Vision to become reality	
<p>Allies & Morrison consider bulk of new developments especially residential could take place in the critical 5 year window</p> <p>Vision for the town centre, such as that proposed by Allies and Morrison is quickly brought to a position where capacity of the area can be established</p>	Subsequent town centre masterplan work by Allies and Morrison have shown that this is not possible
Town centre should be protected; its views should be protected; retail is not the only attraction within the town	Other policies in the Local Plan protect heritage assets and important views
<p>No definition of what areas the town centre covers</p> <p>Unclear from the drafting whether Guildford Town Centre relates only to the Town Centre or to the whole urban area (definition)</p> <p>Policy is too vague about whether it applies only to the urban centre or to the whole urban area</p> <p>Allies & Morrison should prepare vision for a wider area than the town centre</p>	The town centre policy in the Proposed Submission Local Plan applies to the town centre as delineated in the Proposed Submission Local Plan. The town centre Vision covers a wider area, which include land north of the designated town centre.
Council for the Protection of Rural England (CPRE) is concerned whether the area of the town centre is correctly defined. Should it contain the railway station the university, the cathedral and the hospital?	The town centre area does include the railway station, but does not extend beyond the commercial core to areas of predominantly residential uses (as it would if it extended to the hospital, university and cathedral), as advised by national planning guidance.
<p>Guildford exerts influence over Waverley residents, ensure vitality and viability of Waverley towns</p> <p>North Street development should consider viability of High Street. The planned additional retail floorspace could put the survival of Guildford's small, independent shops at risk, and with it, the town's distinctive attractiveness to shoppers, and higher vacancy rates</p> <p>Impact on the viability of the High Street should be an important consideration in assessing any proposals for town centre development</p> <p>Neighbouring borough developments need to be considered and their impact</p>	<p>The Retail and Leisure Update Study 2014 identifies that parts of Waverley are within the catchment of Guildford town centre.</p> <p>As specified in the draft site allocation policy for the significant retail-led development included in the draft Local Plan, the planning application will need to be accompanied by a retail impact assessment, which will consider likely impacts on surrounding centres and on the rest of the centre, due to its size.</p> <p>Whilst it is likely to have some impact, this should not be significantly adverse as it would not exceed identified retail need.</p>
<p>1000sqm retail impact threshold to low, 2,500sqm more appropriate</p> <p>Lower threshold 500sqm gross</p>	We consider that our centres need to be protected by requiring an impact assessment for applications over a lower size
Town Centre Evidence	
The 2011 Retail Study is based on old retail data that ignores on-line shopping trends, and the level of parking and traffic.	This needs assessment has been superseded by a similar Study undertaken in 2014 and published in 2015.

Comment	Guildford Borough Council Response
<p>Target for additional comparison retail floorspace (50,000sqm) is much too high, and not supported by evidence Do not need as much additional retail floor space as proposed</p> <p>Support update retail study</p>	
<p>Over emphasis on overtrading, over inflates future need</p>	<p>The 2015 does not include overtrading in its calculations</p>
<p>Retail need will be greater than 50,000sqm, set gross to 2021 and then allow additional to the plan end</p> <p>Guildford town centre is key retail and service centre for Surrey (region)</p> <p>In what timeframe should new retail floorspace be provided?</p> <p>New shopping trends must be taken into account</p>	<p>Due to inherent uncertainties in calculating retail needs in the longer term (such as changes in expenditure on special forms of trading), we are planning to meet retail needs to 2029, before when need will be review.</p>
<p>Confusion over how many houses we actually need to build Lack evidence to make informed decisions</p> <p>Out of date population figures</p>	<p>This is calculated in the Strategic Housing Market Assessment 2015</p>
<p>Shop vacancy rate should be a monitoring indicator</p>	<p>Agree, this has been added.</p>
<p>Kingston, a larger and more dominant local retail competitor, are also expanding their retail offering. There are only so many shops that a region can support.</p> <p>We should not attempt to improve as “Kingston and Reading and also Woking” but build on Guildford’s particular character and strengths.</p> <p>Guildford town centre is key retail and service centre for Surrey (region)</p> <ul style="list-style-type: none"> o permanent market stalls on different days for themed markets in an area such as Phoenix Court would add to vibrancy o people like coming to Guildford or living in Guildford, precisely because it isn't overdeveloped and sprawling like those other places (yet), and has a smaller, friendlier, more diverse market town feel to it? Quality is better than quantity o new development quarters that this would unlock will bring the centre of Guildford up to the standard of the existing high Street o restaurants and cafes. The area around the cinema has the potential to create a very attractive restaurant quarter 	<p>Whilst Kingston upon Thames is a competing town centre, it serves a different, but overlapping catchment. Kingston is larger than Guildford, with more shops and restaurants. As other centres, including Kingston and Woking improve their retail and food and drink offers, Guildford also needs to increase its retail offer, including larger, more regular sized shop units and more places to eat. The amount of additional floorspace that could be supported over the plan period is calculated in the Retail and Leisure Update Study 2015. We do not want Guildford to be a “clone” town, and the work of the Council Delivery Team, based on the town centre masterplan projects is aimed at such improvements. The Cinema site is to be allocated in the new Local Plan for a larger cinema with more cafes and restaurants.</p>
<p>Support indoor market</p>	<p>Would be a welcome additional to Guildford town centre’s retail offer</p>
<p>Town Centre Uses</p>	
<p>The expected increase in convenience shopping space is welcome, but considerably more is needed to bring us into line with other towns</p>	<p>In recent years there have been several additions to convenience shopping that will serve town centre households</p>

Comment	Guildford Borough Council Response
<p>Improved shopping facilities for those living in town centre, so no need to travel out for supermarkets</p> <p>Guildford is not a centre for everyday shopping</p>	
<p>High Street shuts out small food shops with high rents</p>	<p>Lower High Street is the retail core area, with the highest rents, mostly occupied by national multiples. There are other areas in the town centre with smaller shops and lower rents.</p>
<p>Guildford town centre is a suitable and sustainable location for new homes</p> <p>No homes are proposed for the North Street site (Site 20)</p> <p>Support the provision of 1,932 new homes as part of a mixed use development</p> <p>Plan for new homes to meet priority needs and enhance rather than undermine existing communities</p> <p>Challenge housing proposals that are at odds with what the town needs or can sustain</p> <p>Recognise in housing figures that people travel to and from London and other settlements to work</p> <ul style="list-style-type: none"> • Walnut Tree Close is a sustainable location and should be redeveloped for new higher density housing, with smaller homes for first time buyers or young families. Density could be about 200dph • Walnut Tree Close should be redeveloped for affordable housing making the area more pleasant at night • Walnut Tree Close area alone could provide 4,000 homes, and Allies and Morrison consultants advise these could be delivered in the first five years of the plan. • Concerns over Walnut Tree Close development • Walnut Tree Close, takes important load of traffic of one way system reducing congestion and shouldn't be closed • Walnut Tree Close could accommodate over 1,000 new homes, as the land is in small parcels there is no overall proposed structure for the area and so no provision for infrastructure such as schools • Unsupportable to develop in Green belt in preference to land within the town centre 	<p>Whilst we recognise the town centre as suitable location for more housing, which is reflected in our preferred "spatial hierarchy" for housing, unfortunately many sites in the town centre which could have been available for housing are not currently suitable for housing are limited, in part due to river flooding.</p> <p>New homes (flats) have been added to the draft North Street site allocation.</p> <p>Housing need that cannot be met in our preferred location in the spatial hierarchy will probably need to be met elsewhere, including in extensions to the towns and to rural villages, in order to satisfy the government inspector that we have a "sound" Local Plan that we can adopt.</p>

Comment	Guildford Borough Council Response
<ul style="list-style-type: none"> • Unacceptable to displace communities into green belt • The appetite for land is insatiable; for example, the Spatial Development Strategy(Policy 4.6) states that after the preferred locations(4.4) have been explored, development in other areas would be considered, ie countryside beyond the green belt, urban extensions to Guildford, Ash and Tongham; new settlement at Wisley Airfield and development around some villages(including some expansion). • Capacity and delivery study must focus in on the land areas owned by Guildford Borough Council and when each becomes available for development. This information should then be added to the SHLAA in order to correctly inform housing supply studies. • Guildford has repeatedly asserted that there is insufficient brownfield land for the 5 year supply. • This assertion is indicative of a predetermined policy to build on the Green Belt that is only supported by the erroneous and hugely exaggerated annual housing numbers together with exclusion of the majority of identified brownfield and derelict land from the SHLAA for residential purposes in the first 5 years of the Plan period. • More homes should be planned for Guildford town centre • Guildford town centre would be a livelier place if more people lived over the shops • Use more town centre sites for residential use rather than retail or commercial • More homes with correct infrastructure and amenities • Larger housing sites should be examined carefully by the Planning Inspector • Don't build large number of flats in the town centre • Planning inspectorate should carefully examine sites where larger housing delivery is suggested • 1500 homes to be built in the town centre must be revisited on the important grounds of sustainability. • Use more town centre sites for residential use rather than retail or commercial 	<p style="text-align: center; opacity: 0.5; font-size: 48px; font-weight: bold;">Draft</p>
<p>Retailers are reportedly concentrating in a smaller number of larger centres</p>	<p>This is a recent trend we have noted, for example, with Westfield leaving Guildford</p>
<p>Provide more student housing on the University site to free up homes used as</p>	<p>The University of Surrey does have planning permission for many student flats</p>

Comment	Guildford Borough Council Response
student accommodation in the town	which it has yet to build, mostly at Manor Park campus. It is planning to submit details of these blocks in the next year. There will always be a proportion of university students who will want to live in a shared house in town, and / or may not be able to afford to live in campus accommodation.
Impact Assessment requirements	
Need to ensure that North Street is developed in keeping with the character of the High Street rather than as a “could be anywhere” indoor shopping centre.	A scheme for the site will need to include new public streets and spaces
<p>Masterplan is required for the whole Guildford urban area</p> <p>Do not wait until adoption of the Local Plan to produce a new Town Centre SPD, produce the draft in parallel with the Local Plan even if for some legal reason it cannot be adopted until later.</p> <p>Until a Supplementary Planning Document (SPD) is in place the town centre remains vulnerable.</p> <p>SPD produced with SCC is critical, promote sustainable travel</p> <p>The absence of a town centre plan also hampers effort to identify how many homes can be accommodated there and impact of planned housing on retail need</p> <p>SPD must try and blend the vision with the commercial reality</p> <p>Town centre SPD with ideas from Allies and Morrison and Guildford volunteer group</p> <p>Suitable policies need to be drafted to allow the Council to bring forward Supplementary Planning Documentation</p>	<p>Since 2012 Government policy is to produce a single Local Plan for each local authority area, unless clearly justified. We can see no reason to have a separate Local Plan for Guildford town.</p> <p>An informal masterplan with no status is not able to allocate sites for development or suggested suitable uses.</p> <p>National planning policy tell us to use SPDs only where they can help make successful planning applications or aid infrastructure delivery.</p> <p>Guildford Borough Council is currently progressing a non-statutory town centre regeneration / delivery plan to co-ordinate redevelopment of several council-owned sites that are more complex to redevelop. This may be due to their risk of flooding, co-ordinate traffic improvements, pedestrianisation and improvements to the riverside and public areas of the town centre.</p> <p>Any policies in a SPD must not conflict with the adopted development plan. It is difficult to produce SPD that we know would not conflict with a new Local Plan that has not yet been submitted for be independently examination.</p>
<p>Proposed Supplementary Planning Document ('SPD') for the town centre and GVG's proposed bridge and suggested new residential quarter will need some significant allocations, reservations and amendments which are likely to require a fresh look at some of the evidence.</p> <p>Major development has also been proposed for the station area of Guildford. A Town Centre Supplementary Plan needs to be in place before any application is agreed</p>	An SPD may not allocate site for development, nor add to financial cost of development.
Conversion of some units on Ladymead from bulky goods retail is a very poor precedent	The original planning permission (allowed on appeal before the government's “town centre first” policy) for Ladymead retail part is conditional, preventing the sale of food and drink for consumption of the premises (i.e. supermarkets and food shops). Some of the buildings have since been rebuilt, and their planning permissions also

Comment	Guildford Borough Council Response
	<p>include a similar condition.</p> <p>The retail park is therefore permitted to sell all types of comparison goods, and food and drink on to consume on the premises.</p> <p>Whilst we would like to see the retail park uses only for retail uses that complement and do not compete with nearby town centres, we are bound to accept the sale of goods permitted by the relevant planning permissions.</p>
Develop Slyfield further as a retail park	Slyfield is not a suitable location for a new centre
Will the university build enough accommodation for future students?	<p>Not all university students wish to, or can afford to live in University accommodation. The University also owns some shared houses in town, and there are also shared houses in town that the university can recommend to students.</p>
Portsmouth Road site needs to be developed, plans need implementation	<p>The Plaza site on Portsmouth Road has planning permission for new offices, which has now expired.</p> <p>The site is proposed to be allocated for housing in the 'Proposed Submission Local Plan: strategy and sites'.</p>
Pursue an imaginative approach to how the town centre, research park, Slyfield and other business sites can be enhanced to support and attract innovation and enterprise to underpin Guildford's economy	The Economy policies of the draft new Local Plan consider the needs of all employment areas, those suitable for protecting and intensifying, new sites to provide for future needs, and those that can be redeveloped.
Impact assessments for retail floor space threshold outside town centre rather than primary shopping area	The 'Proposed Submission Local Plan: strategy and sites' sets out a local threshold for retail impact assessments in such locations.
New homes displace employment this brings other problems, such as providing services such as schools, whilst reducing employment in the town centre and displacing this to other sites	<p>A few years ago, the government introduced national permitted rights to convert offices to residential without needing to apply for planning permission.</p> <p>The Employment Land Needs Assessment (ELNA) quantifies this loss.</p>
<p>Proposal to turn scarce land over to 9.9 hectares of additional warehousing is mad</p> <p>More business park capacity away from town centre</p>	<p>The 'Proposed Submission Local Plan: strategy and sites' includes revised figures for employment floorspace and allocates between 4.7 and 5.3 ha of land for light industrial (B1c), industrial (B2) and warehousing and storage (B8) use.</p> <p>We propose a 10/11 ha (approx. 35,000 sq m) extension to Surrey Research Park.</p>
B class uses (offices) have an important role to play	<p>Offices are specifically defined as a "main town centre use" in national planning policy, and new offices are usually best located within town centres, close to public transport and to services.</p> <p>Some offices, such as bespoke office headquarters, may have special locational requirement which mean they need a location outside of the town centre.</p>
Welcome proposals for more restaurants and cafes at Bedford Square	This is a suitable location by the river and close to both the station and retail area
Stop houses being turned into flats	<p>Our monitoring data shows that we do not have a lot of houses converted to flats. Many more are converted to HMOs (which if for n more than 6 people) does not need planning permission.</p>

Comment	Guildford Borough Council Response
Market pressures considered when developing town centre policy	For a government to approve the new Local Plan, it must be “deliverable” in order to be an Effective plan. The new Local Plan therefore takes account of market considerations and pressures.
Welcome restaurants and cafes, but not expansion of inappropriate night-time leisure such as late night drinking Night time economy, careful zoning to allow residential, a quiet nights sleep	Town centres need a mix of uses, including bars and night clubs, but only in suitable locations, and generally not very close to residential areas. We will be careful of amenity considerations and potential for harm to residential properties in planning applications for new bars (Class A4) restaurants and cafes (Class A3).
Guildford by night should be a vibrant community. More residential in the town centre should help this	Agree. All town centres need housing, especially at upper levels.
The document rightly states the need for mixed leisure, housing and retail but I would like to see added to this the need to cater for a wide range of age groups	Agree. A wider mix of uses catering for all ages is needed.
Excessive retail space displacing communities into dormitory satellites in the Green Belt	The retail allocations North Street sites and the railway station) in the draft new Local Plan would not displace communities.
Holistic approach to regeneration in Guildford and this should enable more substantial development but also much better spaces and places	The Council's Town Centre Delivery Team has an overview of most of the town centre sites that are not included in the draft new Local Plan.
The Local Plan appears to be distorted due to the influence of house builders who sit on the EM3 LEP planning committee, and have a stated agenda of wishing to develop the Green Belt and to influence both local and national policy accordingly	The Local Plan is being prepared in accordance with the requirements of the NPPF. This requires that we meet our objectively assessed needs where it is sustainable to do so. The 'Proposed Submission Local Plan: strategy and sites' has sought to meet the needs identified in our evidence base.
Support more innovative use of the Debenhams site	The Debenhams building is in an attractive location and is underused. The Council has looked into potential alternative uses for this site, (with its underground parking and servicing) however, a long lease means that Debenhams is most unlikely to move out until it is expired.
Slyfield is suitable to relocate business	Industrial and warehousing / storage uses can be location to Slyfield. However, offices are specifically defined in government policy as a “main town centre use” to be located in town centres unless they have specific locational reasons.
Guildford must be made more attractive than out of town retail parks where parking is free	In common with most town centres, Guildford town centre needs to offer more than simply shopping. Out of centre retail parks should complement town centres, rather than compete with them. Their retail offer is significantly different, there no leisure or culture opportunities in out of centre retail parks.
Town centre is over crowded excessive increase in population is unsupportive High number of houses proposed	There is no evidence that Guildford town centre is overcrowded
Population projections underlying Policy are flawed Please ensure that Guildford does not become an annex to London	These comments have been responded to in the table for Appendix C: Evidence Base
Transport / parking	

Comment	Guildford Borough Council Response
<p>Perhaps the bottom section of North Street only could be a “shared space” with buses and pedestrians</p> <p>Do not support full pedestrianisation of North Street</p> <p>Support pedestrianisation of North Street</p> <p>Over pedestrianisation could cause further congestion (North Street)</p>	<p>The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. The schemes that we consider are necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the ‘Proposed Submission Local Plan: strategy and sites’. Scheme LRN1 Guildford Town Centre Transport Package comprises various schemes including the replacement Walnut Bridge scheme, to provide a wider structure to cater for higher flows of pedestrians plus usage by cyclists.</p> <p>Other suggested pedestrian improvements that are not considered necessary for the delivery of the draft Local Plan, may be progressed by the Council and/or its partners outside of the Local Plan process.</p>
<p>Providing space for a central, attractive state of the art bus station interchange with connections to all parts of the borough will be essential to reduce car dependency for journeys to the town centre and to transform attitudes to public transport</p>	<p>The site allocation in the ‘Proposed Submission Local Plan: strategy and sites’ requires that “Bus interchange facilities presently provided at Guildford bus station on the site are to be provided in a suitable alternative arrangement to be located either partly or wholly on or off site” and that “If alternative arrangement involves on-street provision of bus stops and waiting facilities within the town centre, consideration is required of interactions with other uses such as North Street market, vehicular access and parking, movement and crossings for pedestrians, and the quality, character and setting of the town centre environment”.</p> <p>New Guildford town centre bus facilities is scheme BT2 in Appendix C Infrastructure Schedule.</p>
<p>Traffic problems getting in and out of Guildford</p> <p>Traffic is a problem in town centre</p> <p>Traffic harmful to health and environment</p> <p>Traffic free zone or zones required to create pedestrian-friendly areas</p> <p>Route traffic around the town and not through it</p> <p>Restrict traffic up and down Agraria Road</p> <p>Road infrastructure is weak</p> <p>Improve gyratory</p> <p>Do not extend gyratory, congestion will spread outwards to residential communities</p> <p>Switch off gyratory system</p> <p>Extending gyratory and building bridge lower down will only shift the problem</p> <p>Gyratory improvement should be developed in far greater detail</p> <p>Bridge Street should be dedicated to bus, cycle and pedestrian movements</p> <p>Improve A3, tunnel under Guildford</p> <p>Congestion will be caused by additional people in new homes around the borough</p>	<p>The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. The schemes that we consider are necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the ‘Proposed Submission Local Plan: strategy and sites’.</p> <p>Other suggested improvements that are not considered necessary for the delivery of the draft Local Plan, may be progressed by the Council and/or its partners outside of the Local Plan process.</p> <p>The strategic transport assessment for the ‘Proposed Submission Local Plan: strategy and sites’ assesses the impact of planned growth in the plan period and the impact of infrastructure proposed in the Infrastructure Schedule in mitigating the</p>

Comment	Guildford Borough Council Response
<p>coming to town centre Improve Park and Ride that is free to use Buses and park and ride strategy required Have to use car to get to work, remove bus lanes that are hardly used Reinstate Debenhams subway River and rail crossings joining the town, cathedral and university, needed / Another bridge crossing river and railway needed Integrate the cathedral and University into town centre Integrate traffic, bus, pedestrian and cycling movements Improve railway facility Access to the railway station from the shops needs improving New railway station improvement on tired old one Tram system from Park & Rides to the town centre Better link between bus and train station Proposals in the Vision document for removal of traffic and a new bridge should be incorporated into the Local Plan infrastructure requirements Improve infrastructure with expansion of housing stock No traffic analysis of the gyratory Detailed traffic study is essential A detailed study should be carried out, taking into account the proposed developments, looking at traffic, bus facilities, pedestrian and cycle movements. The output should include a preferred solution.</p>	<p>impact of the planned growth. This includes planned housing and schools.</p>
<p>Design / Public Realm / Heritage Sightlines and views of the countryside outside the town centre, and to the cathedral are important, and their protection should be included in this policy Need greater emphasis on the River Wey Lots of scope for redevelopment of the riverfront. In particular, much more could be made of the space currently occupied by Debenhams Strengths of the town centre include many individual shops and fewer shop vacancies than else (independent shops), Not swamped by high street chains All land owned by the National Trust in Guildford has been declared inalienable and enjoy special protection Improve pavements What does investing in high quality public realm mean? Town square in Tunsgate a defined by the heritage quarter Promote replacement of building of poor design Experience has shown that large developments can appear oppressive and can give too much power to one developer</p>	<p>The 'Historic Environment policy included in the Proposed Submission Local Plan: strategy and sites' recognises the importance of the setting of heritage assets, which will include important views. This policy will be applied, in conjunction with others in the plan, when assessing all new development affecting the historic environment.</p> <p>Much of the River Wey is included in a conservation area, the proposed Historic Environment policy would apply when assessing new development affecting its setting.</p> <p>The Debenhams building is in an attractive location and is underused. The Council has looked into potential alternative uses for this site, (with its underground parking and servicing) however, a long lease means that Debenhams is most unlikely to move out until it is expired.</p> <p>The draft design policy "Making better Places" requires new development to consider its context, this will include the surrounding public realm and help to</p>

Comment	Guildford Borough Council Response
<p>Sightlines and views of the countryside outside the town centre, and to the cathedral are important, and their protection should be included in this policy</p> <p>Take care with building heights, for example at the railway station</p> <p>Leisure and recreational resource</p> <p>Views to the cathedral should also be protected</p>	<p>promote good design in the Borough.</p> <p>The 'Historic Environment policy included in the Proposed Submission Local Plan: strategy and sites' recognises the importance of the setting of heritage assets which will include important views. This policy will be applied, in conjunction with other policies in the plan, when assessing all new development affecting the historic environment.</p>
<p>Debenhams and the car park between Onslow Street and the High Street bridge should include a town plaza with a relocated central library overlooking riverside bars and restaurants</p> <p>Use Debenhams riverside terrace</p>	<p>The Debenhams building is in an attractive location and is underused. The Council has looked into potential alternative uses for this site, (with its underground parking and servicing) however, a long lease means that Debenhams is most unlikely to move out until it is expired.</p>
<p>There is nothing in the draft policy to stress importance of preserving the character of the town centre. The policy should preserve it</p> <p>Central plaza</p> <p>Design of development should respond to local character</p> <p>Town centres as heart of communities</p> <p>Too many town sites proposed, Guildford continuous building site</p>	<p>The 'Historic Environment policy included in the Proposed Submission Local Plan: strategy and sites' recognises the importance of the Boroughs heritage assets and their settings, this policy will be applied, in conjunction with other policies in the plan, when assessing all new development affecting the historic environment.</p>
<p>We note the distinctive character and historic importance of Guildford town centre. This includes its setting surrounded by hills, its historic buildings and river setting</p> <p>Potential to enhance town aspects and provision</p> <p>Short walk to greenfields and can see them from the high street</p> <p>Create green spaces</p> <p>Prevent garden grabbing</p> <p>Resisting light pollution</p> <p>Street furniture</p>	<p>The 'Historic Environment policy included in the Proposed Submission Local Plan: strategy and sites' recognises the importance of the setting of heritage assets and will be applied in conjunction with other policies in the plan when assessing applications for new development.</p>
<p>Policy 15 also needs to set out design requirements/design statement</p> <p>Consider adopting a Design code for the town centre</p> <p>Strengthen protection of Guildford Victorian/Edwardian heritage</p> <p>Update and make use of residential design code</p>	<p>The design policy "Making Better Places" included in the Proposed Submission Local Plan: strategy and sites is a strategic policy and would not be able to adopt a design code for the town centre. Design will be addressed in more detail in the Local Plan Delivering Development document.</p> <p>The 'Historic Environment policy included in the Proposed Submission Local Plan: strategy and sites' will be used in conjunction with others in the plan, to ensure that the heritage assets are conserved and enhanced.</p>

Comment	Guildford Borough Council Response
	The Residential Design Guide, July 2004 will remain in place.
<p>Need greater emphasis on the River Wey</p> <p>Protect area along the river for outdoor space and not high rise development, particularly along Walnut Tree Close</p> <p>Children's play area along the river</p> <p>More than half of the centre is of low architectural value, scruffy and derelict; particularly the River Wey corridor, which needs totally redeveloping</p> <p>River to integrate more fully with town centre, protect & enhance character</p> <p>Imaginative approach to the financing and delivery needs to be found</p> <p>We should integrate the river more fully into the High Street/Guildford centre</p> <p>Create public spaces</p> <p>River Wey is a wildlife corridor</p> <p>Flood along River Wey impacts on Town Centre</p> <p>Flood risk taken into account before proposing any development</p> <p>Flood areas in town centre should only use first floor for development with ground floor for garages, parking and limited storage</p>	<p>The River Wey is included in two conservation areas, Bridge Street Conservation Area and the Wey and Goadalming Navigation, the draft Historic Environment policy would be applied to any proposed development in its vicinity.</p> <p>Guildford Borough Council is currently progressing a non-statutory town centre regeneration / delivery plan to co-ordinate redevelopment of several council-owned sites that are more complex to redevelop. This may be due to their risk of flooding, co-ordinate traffic improvements, pedestrianisation and improvements to the riverside and public areas of the town centre.</p>
<p>Guildford's lanes are part of its heritage to be preserved, but not without consideration of today's trends. A combination of old and new is preferable. People like to browse brand names as well as the lanes, which is reminiscent of Brighton.</p>	<p>The lanes in Guildford town centre are part of the towns historic character and are included within the Guildford Town Centre Conservation Area, the character of which any proposed development will be expected to conserve and enhance.</p>
<p>People-friendly streets and new public spaces should be welcoming</p>	<p>Agreed.</p>
<p>Better advertising to and directions to heritage assets needed</p>	<p>We will assess any application for advertising in the town centre against all of our policies.</p>
<p>Possibility of multi storey or underground parking provision</p>	<p>This makes very efficient use of land, and is very common in European cities. Has a high build cost due to excavation, but this is to be offset by the floorspace in buildings on the site.</p> <p>Ground floor "undercroft" parking is often difficult to design in at street level.</p>
<p>Possibility of residential accommodation above ground level car parking which may be subject to flooding</p>	<p>Policy P4 of the 'Proposed Submission Local Plan: strategy and sites' sets out the Council's approach to mitigating flood risk. Development will be directed to areas at lowest risk of flooding first. However, where development is proposed in areas of flood risk, the vulnerability of the proposed use (and flood zone it is located in) will be taken into account. The proposal must also meet various other criteria, including demonstrating that the development will be safe for its lifetime (flood resilient) and</p>

Comment	Guildford Borough Council Response
	provide safe access and egress to users/occupiers.
Town Centre the areas that feature in the plan seem a bit random	These are the areas that Allies and Morrison as the Council's consultant considered important to be included in the plan.
Further integrate Ladymead and out to Slyfield	We do not consider these areas need to be integrated with the town centre, as they serve a different purpose. They are accessible by car from the town centre.
Ladymead Retail centre badly positioned	It was granted permission at appeal before the government's town centre first approach
Ladymead should be redeveloped into quasi 'Bicester village'	It would have to comply with the government's "town centre first" approach, introduced in the mid-1990s
The railway station has been put forward by Guildford Vision Group and Allies and Morrison with options demonstrating how intelligent planning can produce sites that are both pleasing on the eye and meet reasonable density levels	Thank you for your suggestions
Concerns over railway station development	These are subject of a current planning application and concerns should be directed to this planning application
Build as much as possible and railway station	Our spatial strategy is to focus development as far as is suitable on previously developed land, subject to character, visual amenity and other such considerations.
High density of residential near station, care given many local problems	

Comments on Policy 16: District and Local Centre

Issue	Guildford Borough Council Response
Support this policy; it would further benefit from specific wording to ensure that local centres are not competing with large new supermarkets	The scale of units in local centres does not compete with large supermarkets, as they serve a different function
Support a tightly drawn town centre boundary We welcome the clear distinction between the town centre and the residential character of adjoining suburban areas.	Agree, we have removed areas of almost exclusively housing from the designated TC
280 sq. m as the threshold for requiring sequential assessment seems to be too high, and could divert trade from local and district centres.	We chose to define "small scale" in NPPF para 25 in accordance with the Competition Commissions' definition of "smaller convenience stores". These provide for everyday goods. We have reconsidered this in light of comments received and our survey of existing local, district and town centres, and London small shops study 2010, and proposed to reduce this to 100sqm gross.
Appropriate locations for supermarkets with adequate car parking should be identified in the Local Plan	Very little additional convenience floorspace is needed, other than in the south Ash / Tongham area and the new local centres which will form part of mixed use strategic sites.
East Horsley is a village with a population of just over 4,000. It is not a town and	A settlement of this size needs to have some services to be sustainable.

Issue	Guildford Borough Council Response
does not need town centre uses	If not, people would need to travel to do everything, including buying food, visiting the pub, getting a takeaway, etc.
Object as this retail centre hierarchy is based on a flawed settlement hierarchy survey	This retail hierarchy has been in place in Guildford's Local Plan for at least two decades, and is not based on any settlement hierarchy survey
All new development should provide underground parking. Land is scarce in this borough we must not waste it	We support making efficient use of land, which includes minimising surfacing parking, and supporting principle of underground parking. However, it has a significant impact on development costs, so they would make some developments unviable
The key evidence documents referred to in this policy are not the latest versions	The evidence to support this policy has been updated and the policy redrafted
It appears that East Horsley identified as a District Centre as it has a large supermarket, although the only supermarket is a small supermarket that can open all day Sunday The designation of Station Parade, East Horsley as a rural District Centre is inappropriate; it is a small village shopping parade, would target unsuitable office, retail and other commercial developments	East Horsley is the largest village in the borough. Reflecting this, it has a district centre close to the station and a local centre
Agree that district and local centres are a focus for communities and provide a focus for everyday shopping and service needs	This is reflected in the draft policy
Development in these centres must be in line with the character of individual centre	New developments must respect the scale and function of that centre, and other policies will ensure that the new buildings respect the character of the area
Agree with strategy to encourage provision of new homes above ground floor	Will add liveliness to the centres in more sustainable locations.
Welcome the intention to allow flexibility to enable local centres to adapt to changing circumstances	Retail and the role of centres is changing as with new technology and changes in lifestyles affect what spaces we need
Agree that developments of 500 sq m gross are probably out of scale with most district centres and could be qualified by adding a phrase at the end "and are unlikely to be acceptable". We appreciate that the NPPF threshold is higher than the threshold suggested	Such developments will be assessed for their likely impact, and would be refused if it is significantly adverse
We have seen no evidence to demonstrate why a lower threshold for impact assessment is required in Guildford, compared with the 2,500sqm default national threshold in the NPPF. The NPPG clarifies issues to consider in setting a local impact assessment threshold, the Council should set out clearly why the proposed threshold has been selected against these criteria.	The reasoning, relating to the NPPG criteria, is set out at paragraphs 9.20 – 9.28 of the 2014 Retail and Leisure Update Study.
Impact assessment threshold: <ul style="list-style-type: none"> • Fully support including a threshold for requiring a retail impact assessment for retail, leisure and office development; this is consistent with paragraph 26 of the NPPF. However, there is inconsistency between the proposed threshold in Policy 15 and Policy 16. 	Having considered the comments received and the NPPG, we now consider 500sqm to be suitable for all centres. We have changed the draft policy to 500sqm for outside all centres.

Issue	Guildford Borough Council Response
<ul style="list-style-type: none"> We support the threshold in Policy 16 to provide an impact assessment proposals over 500sqm (gross) outside of local and district centres on sites not allocated in the Local Plan. We suggest that this threshold is also adopted in Policy 15 – Guildford Town Centre (rather than the 1,000sqm threshold currently proposed) 	
<p>The policy should include wording to specify that retail floorspace provided as in local centres must be strictly limited to only that serving the everyday needs of the immediate local catchment.</p> <p>This is particularly important in relation to the allocation of potential new urban local centres</p>	<p>The policy refers to proposals being of suitable scale.</p> <p>Site Allocation Policies for strategic sites include amount of floorspace suitable for new local centres.</p>
<p>We should retain the green, residential character of routes connecting the town centre to other business areas</p>	<p>These policies would not impact on the leafy residential character of the residential streets leading to the town centre, which are now not included in the centre's new boundary.</p>
<p>East Horsley:</p> <ul style="list-style-type: none"> Care is needed over authorising any proposals for additional retail space in district and local centres. Such centres may arguably have too much space at the moment. Even in prosperous Horsley, retail units in Station Parade have often been left empty for extended periods and various new businesses have tried and failed to make a living here. Currently three of the small number of retail units in East Horsley are only finding a use as charity shops, which is not really a sensible use of the space. (One charity shop in a village might be useful - but three?). Another two retail premises are currently vacant and unused. Local shops are struggling to buck current trends such as internet shopping and the dominance of large supermarkets and malls. In all probability they would continue to have problems even in expanded villages. 	<p>We survey the district and local centres every year, and vacancy rates are generally low. We allow flexibility of uses within these centres, so that other services may occupy some of the units, as well as shops.</p> <p>This is not borne out by our evidence of the liveliness and economic resilience of our local centres.</p> <p>The balance between small and large supermarkets is rebalancing from the days of large out of town superstores, for a weekly shops.</p>
<p>The University will provide a local centre for Blackwell Farm urban extension (Site 60). More local facilities and services could be provided if additional land were included</p>	<p>Specified in the site allocation policy.</p>
<p>Getting local and district centre right is key for new developments such as Site 48 (SARP). Residents groups, local councillors, etc must be involved with discussion from the start to help ensure this</p>	<p>Due to its location relative to current provision, our Retail Study found that SARP does not warrant a new Local Centre</p>
<p>Local centres, including Effingham may benefit from installation of a bike rack</p>	<p>Local and District Centres do benefit from improved cycle and car parking provision. The Parish's share of the Community Infrastructure Levy could be used to fund this type of infrastructure improvement.</p>

Issue	Guildford Borough Council Response
To encourage use of district and local centres, free short-term parking should be available	Many centres in the borough already benefit from free parking.
East Horsley designation as a District Centre could lead it to becoming a Business Centre area, with many retail, leisure, entertainment and commercial developments unsuitable for the village. Such designation would bring in more cars and traffic	The scale of development would need to be suitable for a District Centre.
Fails to acknowledge the internet revolution. Shops are unnecessary build delivery depot instead	Internet sales, those sourced from bricks and mortar stores, from warehouses are taken into account. Any new depot will come forward under our employment policies or sites for warehousing.
This policy seems to suggest that there is scope for building retail or town centre facilities in rural areas. Urbanising the countryside will only reduce central Guildford's role as an urban hub and lead to the destruction of villages	Rural areas need shops and services in order to be to be sustainable. Facilities of suitable scale are needed in rural areas so that people do not need to drive into town for a pint of milk or a visit to the pub.
The trend for mixed sites such as retail, with offices and accommodation above does not appear to have been seriously considered	Most centres have a mix of uses in each building, and the new policies encourage that.
I note the resistance to high or higher rise buildings in central Guildford in particular is notable. There are numerous examples of quality and architecturally imaginative high and high rise buildings built and under construction in south west London (MP Paul Beresford)	There is precedent for buildings of some 6-7 storeys in the Town Centre. Great care must be taken with building heights, particularly in the sensitive heritage areas, including Conservation Areas and the High Street, with one of the highest concentration of Grade 1 and 2*building in any High Street in the country.
None of the borough villages should be classified as a district or local centre	Rural areas need shops and services in order to be to be sustainable. Facilities of suitable scale are needed in rural areas so that people do not need to drive into town for a pint of milk or a visit to the pub.
The policy is unclear and not transparent. For example, reference to "embrace flexibility, etc" what is this supposed to mean in reality	Agree unclear and high level. This wording does not appear in the new Policy.
Lack of practical guidance: <ul style="list-style-type: none"> • Policy 16 does not provide much practical guidance for planning decisions. It appears to favour the construction industry through the building of new facilities in rural areas, although what these are, and why they are needed, is left unclear • The Policy says nothing about how GBC will protect existing rural shops and centres 	The 2014 draft policy was a strategic level policy. The new Policy included in the 'Proposed Submission Local Plan: strategy and sites' includes details of how proposals will be dealt with.
"We will not apply this sequential approach to small developments of town centre uses of less than 280sqm (gross) in rural areas"?	We agree that this is a generous size for small developments in rural areas not to be subject to the sequential assessment.
How does this square with Policy 10's stipulation on countryside outside the Green	The new draft policy permits small developments (100sqm) of town centre uses

Issue	Guildford Borough Council Response
<p>Belt that “only development which requires a countryside location or where a rural location can be justified will be permitted”?</p> <p>Will any development of the appropriate size therefore be allowed in rural areas?</p>	<p>anywhere in rural areas.</p> <p>Over this size, and provided of a suitable size, developments must be located in a rural Local or District centre.</p> <p>Small developments for retail and similar town centre uses, serving localised populations could well be justified in a rural location, for example where there is no existing convenience provision serving the immediate areas.</p>
<p>What does the Policy <u>mean</u>?</p> <p>Does it mean more shops in villages instead of urban areas?</p> <p>Why should GBC prescribe this rather than leaving it to local demand?</p> <p>What right or power is GBC assuming to “direct developments”?</p> <p>Could the Policy mean new Waitrose stores in the Green Belt?</p>	<p>No, the new policy explains that the hierarchy of retail / service centres includes both urban and rural centres.</p> <p>It is possible under current Local Plan policy to have a new supermarket in the Green Belt if the proposal meets certain criteria. The current policy allows limited infill and the re-use of permanent buildings in the Green Belt.</p>
<p>Traffic, and other issues can arise when businesses and residential uses are mixed</p>	<p>Our centres will generate traffic, although a good network of centres will ensure that no-one needs to travel very far.</p> <p>Mixing uses tends to reduce traffic movements.</p>
<p>Terms “sequential testing” and “local centre and town centre definitions” are confusing</p>	<p>The meaning of these terms will be explained in the glossary</p>
<p>Defend diversity and identity of local centre by encouraging small local shops and range of community cultural and leisure facilities</p>	<p>The new District and Local Centre policies are flexible enough to allow for changes.</p>
<p>Policy is good, don't want to be swamped with Tesco local, with extra traffic</p>	<p>Policy has been reworded, but protects centres from out of scale developments.</p>
<p>Villages have declined, with loss of shops, post offices and pubs</p>	<p>Rural areas need shops and services in order to be to be sustainable. Facilities of suitable scale are needed in rural areas so that people do not need to drive into town for a pint of milk or a visit to the pub.</p> <p>This has happened in some of our villages and needs to be reverse.</p>
<p>Object to Policy, natural retail growth should be sufficient</p>	<p>Assume that “natural” retail growth is referring to market forces determining scale and location. This could have significant harmful impacts.</p>
<p>Policy to encourage homes over shops</p>	<p>These bring liveliness to centres, and the new policies encourage this.</p>
<p>Bear in mind impact of district and local centres on the town centre</p>	<p>The borough's retail hierarchy of centres of different scales has been established over time to ensure the optimum distribution.</p>
<p>Guildford borough council should consult small shops to appreciate how hard it is to survive in today's market.</p>	<p>We have carried out very wide and inclusive consultations to reach as wide an audience as possible.</p> <p>We appreciate these difficulties in an era of multinational dominance.</p> <p>We will ensure there are small units for independents businesses to rent so the borough has a mixture of businesses.</p>
<p>Large supermarkets are looking at the viability of their smaller outlets and closing down Aldershot's larger store</p>	<p>The move to small and medium sized supermarkets seems to be the current pattern in supermarket shopping.</p>
<p>Supermarkets have put small shops out of business</p>	<p>In some case across the country this has happened.</p>
<p>Policy 16 is based on the settlement hierarchy which is flawed and has been amended without attention drawn to the changes</p>	<p>It is not based on the Settlement Hierarchy, but on the long-established network of centres across the borough.</p>

Issue	Guildford Borough Council Response
Village settlements, small service centres which will provide an important role supporting new growth	Rural areas need shops and services in order to be to be sustainable. Facilities of suitable scale are needed in rural areas
Care is needed over authorising any proposals for additional retail space in district and local centres. Such centres may arguably have too much space at the moment	Agreed, that could potentially be an issue that could lead to long-term vacant units, which none wants to see. Policies require new retail to be of suitable scale for the centre, and incorporate flexibility of use.
Horsley, retail units in Station Parade have often been left empty for extended periods and various new businesses have tried and failed to make a living here. Currently three of the small number of retail units in East Horsley are only finding a use as charity shops, which is not really a sensible use of the space. (One charity shop in a village might be useful - but three?). Another two retail premises are currently vacant and unused	According to our annual surveys and the "Retail and Leisure Update Study 2014", Station Parade District Centre is well occupied with low vacancy rates and very few long term vacant units. There is a good mixture of uses and the centre is well used.
Ripley is largest local centre and should receive a proportional level of growth.	Ripley is to be upgraded to District Centre status, reflecting its number and mix of units and the role it plays locally and for passing traffic.
Effingham is adequately served by large supermarkets in adjacent boroughs Major developments would threaten existence of independent shops	No additional supermarkets are planned for Effingham in this Local Plan. In the incorrect place, they could well do, although ideally, they can co-exist and complement each other. Need for impact assessment will minimise risk of this.
Free parking essential to Effingham small retail outlet	Parking is very important to There is unrestricted on street parking in front of this small centre.
Sequential and impact tests need to be applied in order to ensure protection of liveliness and economic resilience	These are national tests and are incorporated in the new Policies as to be applied locally.
Policy is inadequate for neighbourhood centre, takes no account taken of spatial policies	We do not have any Local Plan policy for Neighbourhood parades of shops, which we do nor designate as centres. The smallest centres we designate are Local Centres.
Some additional housing in Effingham would help viability of the local shopping centre	The new Plan policy for Local Centres supports housing on upper floors.
Include cross border (borough) issues	Cross-borough implications are taken into account in new Policy for Guildford town centre, whose catchment extends way beyond the borough. Any retail impact assessment the main North Street site will need to consider any likely impacts on nearby town centres.
Object to more retail and town centre facilities, natural retail growth should be sufficient	Assume that "natural" retail growth is referring to market forces determining scale and location. This could have significant harmful impacts.
Why so late to assess need for additional retail floor space need	We commissioned a Retail Needs Study that reported in 2006, 2011, and most recently in 2014. National Planning Guidance tells us to updated these regularly as retail patterns change.
Retail centre should meet changing retail, leisure, social and community needs	Agree, and the new Policies are flexible to allow for these.
Local shops are struggling to buck current trends such as internet shopping and the dominance of large supermarkets and malls. In all probability they would continue to have problems even in expanded villages	The Retail Needs Study Update takes recent changes in internet and mobile phone retail sales into account.
Some of village and neighbourhood centre finding closed down due to competition	We survey the centres annually, and have incorporated flexibility into the Policy to

Issue	Guildford Borough Council Response
from else where	try to ensure that units do not remain vacant long term.
District and Local centres could develop in response to housing growth, local plan should remain flexible to accommodate	We have incorporated flexibility into the Policy to try to ensure that Centres can adapt as needed.
Ripley, more and more empty shops, why provide more	The centre has very low vacancy rate.
Evidence base out of date, Town centre vitality and viability is out of date	The Retail Needs Study and town centre viability surveys have since been published. We also survey each centre annual and record the use of each unit.
Provision of retail within district of local centre not subject to local demand rather than central direction	If the market demand is not there, the retailers will not want to be located there.

Comments on Policy 17: Infrastructure and delivery

Issue	Guildford Borough Council Response
Comments on draft Policy 17 and its wording	
<p>Economic viability clause / waiver weakens policy.</p> <p>Development should not be allowed if necessary infrastructure cannot be provided.</p> <p>If the infrastructure cannot be afforded then the development must not go ahead; or the area will be blighted by road chaos, sewage and flood problems.</p> <p>Full consideration of paragraph 173 of the NPPF is also required to ensure that the policy burdens do not unnecessarily threaten the viability of schemes. This needs to be embedded within this policy</p>	<p>This has been removed from the draft policy, as it repeats national planning policy (NPPF, paragraph 174) and guidance (NPPG) without adding a local dimension to it.</p>
Local Plan is not economically viable	The Local Plan and Affordable Housing Viability Study 2014 and its 2016 update demonstrate that the plan and its policies and sites are viable, as required by national planning policy.
<p>Concern regarding taking into account economic viability in considering infrastructure improvements.</p> <p>Indicates permission may be given without the necessary infrastructure.</p> <ul style="list-style-type: none"> • Viability are unnecessary • Viability taken into account when negotiating planning obligations 	<p>This has been removed from the draft policy, as it repeats national planning policy (NPPF) and guidance (NPPG) without adding a local dimension to it.</p>
<p>Support CIL with appropriate chargeable rates</p> <p>The council needs to ensure it fully understands the value of development being created and what can therefore realistically be levied. The valuation methodology</p>	<p>Guildford Local Plan Viability and Affordable Housing Study 2014 and its 2016 update Study consider the viability of development outlined in the draft Local Plan. This work is iterative and will be worked up until the plan is submitted to the Secretary of State for examination.</p>

Issue	Guildford Borough Council Response
<p>employed means that very small changes in inputs such as sales price or build cost produce major changes in profitability or what can be offered by way of social housing.</p> <p>Similarly when it comes to the exercise of PD rights - which may result in a poor quality scheme which nobody in reality would build but no social housing - the council needs to obtain expert advice in negotiating with the developers in order to ensure that when giving consent in a location which, but for the PD rights, might not be suitable, they obtain an appropriate contribution.</p>	<p>We appreciate the sensitivity of the development appraisals and the assumptions and inputs.</p> <p>Once we have introduced the CIL, we will require CIL contributions from Permitted Developments.</p>
<p>No Green Belt land is required, however there needs to be a policy that should refer to CIL payments.</p> <p>Mix of housing should be agreed in advance. CIL should be agreed and money in the bank, before a tree is cut down or a blade of grass disturbed. This needs to be part of the developer financial cost. Organisations which cannot afford to do this should be weeded out.</p>	<p>Policy 17 in part concerns the CIL, which the council intends to introduce as soon as possible. In order to introduce the CIL, we need evidence of the infrastructure projects and the infrastructure costs (and the gap in funding) to support delivery of the development included in the Local Plan.</p> <p>CIL payments will be agreed development is approved, but CIL payments cannot be in the bank before development starts, as national rules set out when payments must be made (unless we chose to adopt an Instalments Policy to allow staged payments to help cash flow for the development).</p>
<p>I am in favour of the plan as long as there is adequate provision for an additional doctor's surgery, adequate school places provided and increased parking facilities in East Horsley.</p>	<p>Comment noted.</p>
<p>Not clear who would provide the additional infrastructure, nor where the funding for new infrastructure needed will come from</p> <p>No / insufficient details of who would provide the additional infrastructure</p> <p>Funding for the new / improved infrastructure is lacking/unclear</p>	<p>Planned development, both the strategic sites and the cumulative impact of smaller sites, will place extra pressure on existing infrastructure and will need new or improved infrastructure.</p> <p>The Infrastructure Delivery Plan (IDP) and the Local Plan Infrastructure Schedule set out the key infrastructure to needed support these sites, who will fund and deliver it.</p> <p>The IDP will be updated as further detail is available. Developer contributions (including the "pooled" Community Infrastructure Levy) and other funding sources will be used to ensure that key infrastructure is delivered to be available when it is needed.</p>
<p>Existing flooding, will worsen with the planned housing, reducing quality of life : Main road between Guildford and Normandy, Normandy (Victorian 6 inch cast Iron sewers), Flexford (problem currently being addressed), Wood Street (and sewerage problems on broad Street Common), Ripley Lane is often flooded after a few hours of rain and impassable in a car near Jury's Farm, plot between Silkmore Lane and Ripley Lane floods every year (although draft LP has it in low flood zone), land</p>	<p>Guildford and Ash Surface Water Management Plan highlight areas that are suffering from surface water flooding issues. Accompanying Action Plans highlight actions, responsibilities and committed and potentially funding sources.</p> <p>Planned development, both the strategic sites and the cumulative impact of smaller sites, will place extra pressure on existing infrastructure and will need new or</p>

Issue	Guildford Borough Council Response
<p>between Meadow Way and the railway line in East Horsley; a brook runs its length, After heavy rain the main sewer parallel to Ockham Road overflows and raw sewage spills from a manhole cover in a field in Slade Farm, depositing in the field and adjacent ditch, Green Lane is a major flood risk, with raw sewage pouring into the roads such as in winter 2013, Ripley Lane near Jury's Farm, West Horsley is completely impassable several times a year, Ripley Lane, the Street, East Lane, Ockham road North, The Street, East Lane, and Long Reach are impassable after heavy rain, Effingham Common Road; caused directly by existing run off from the ditch draining Effingham Lodge Farm directly opposite Leeward Way farm, Ladymead, especially by Denis's Roundabout, Fairlands, Send Marsh (Road), Hogs Back, hard landscape, Low lying areas a little to the North, A320, Clay Lane, A323, Ripley village, Keens Lane, Tangle Lane, Ockham Road North, Potters Lane, Send, Send Hill, Burnt Common, Send Barns Lane, Blackwell, Send, Worplesdon, A247, Three Farm Meadows, Newark Lane, Wisley Lane, Silkmore Lane / Ripley Lane, Cobham, Gravetts Lane, Liddington Hall, Woodstreet village, Glaziers Lane/Guildford Road, Building countryside soakaway, Bullens Farm, Building on Green Belt land will increase flood risk, Broadstreet Common, Rydes Hill to salt box road, New town along A3, Effingham, East Horsley, Ockham, Nightingale Avenue, Crescent, Apply Local Flood risk policy, Westwood Lane, Tannery Lane, Wharf Lane, Broad Street, Ockham Road North/western lee, North west Guildford, Compton, Hogs Back, University, Meadow Way Horsley, Ockham Lane and West Clandon proposed school site.</p>	<p>improved infrastructure.</p> <p>The Infrastructure Delivery Plan (IDP) and the Local Plan Infrastructure Schedule set out the key infrastructure to needed support planned housing, who will fund and deliver it.</p> <p>The IDP will be updated as further detail is available. Developer contributions (including the "pooled" Community Infrastructure Levy) and other funding sources will be used to ensure that key infrastructure is delivered to be available when it is needed.</p>
<p>Timing : The supporting infrastructure needed to enable development must be in place before the development taking place</p>	<p>Planning obligations can be used to mitigate impacts of development and support the provision of local infrastructure.</p>
<p>Developments need to provide the necessary SANG</p>	<p>This mitigation is prioritised in the policy to reflect our legal obligations under European legislation</p>
<p>Comments about inadequacy of current infrastructure</p>	
<p>Current infrastructure issues must be solved before any new development is permitted</p>	<p>The Council and its partners are currently working to improve the current infrastructure issues of particular concern. This include ensuring that sufficient school places are available in the borough when needed, the town centre gyratory is not a hindrance to town centre businesses.</p> <p>We cannot require developments to contribute to resolving existing infrastructure issues due to the legal tests that a planning obligation are subject to, i.e. that the planning obligation is:</p> <ul style="list-style-type: none"> • necessary to make the development acceptable in planning terms, • directly related to the development, and • fairly and reasonably related in scale and kind to the development.

Issue	Guildford Borough Council Response
	<ul style="list-style-type: none"> Once we have introduced the Community Infrastructure Levy, we can use the CIL to fund improvements to infrastructure that would be worsened by new development, as well as providing new infrastructure.
Object to planned development, as existing infrastructure is currently inadequate	We must meet our needs for housing, employment, retail, etc as far as we can given constraints.
<p>Existing Electricity supply is already inadequate, which the planned housing will worsen,</p> <ul style="list-style-type: none"> Overhead power cables wood street village, Fairlands, Jacobswell, North West Guildford, Normandy, Worplesdon, Liddington Hall, Independent consultants on supply, Sustainable energy generation required, West Horsley, East Horsley, Wood Street village, Compton, Electricity supplies not consistent in villages, Free electricity charging points <p>Existing Gas supply is already inadequate, which the planned housing will worsen,</p> <ul style="list-style-type: none"> Fairlands Jacobswell West Horsley <p>East Horsley</p> <p>Broadband speeds and telecommunications infrastructure are inadequate in Ash and in many rural areas, such as Clandon, Fairlands (power cuts), Effingham Ockham, and Horsley.</p>	<p>Planned development, both the strategic sites and the cumulative impact of smaller sites, will place extra pressure on existing infrastructure and will need new or improved infrastructure.</p> <p>The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure to needed support these sites.</p> <p>The IDP will be updated as further detail is available. Developer contributions (including the “pooled” Community Infrastructure Levy), planning contributions and other funding sources will be used to ensure that key supporting infrastructure is delivered to be available when it is needed</p>
<p>Existing health infrastructure including GPs surgeries is already inadequate / under pressure, which the planned housing will worsen, reducing quality of life :</p> <ul style="list-style-type: none"> Normandy, Fairlands, Ripley Village Medical centre, A&E, Send Marsh, Burntcommon, Stoughton, Park Barn, Normandy, Effingham, Worplesdon, Burpham, Liddington Hall, Consider requirements of aged, disabled, ill, infirm, Ash and Tongham, Maternity ward, Guildford centre; the medical centre at East Horsley; Send; and the Royal Surrey Hospital 	<p>We are working with health care providers to ensure they have the buildings and sites to meet their needs over the plan period.</p> <p>Planned development in the area will increase the number of patients in the area. The Horsley Medical Centre has capacity to expand at the existing location.</p>
<p>The following areas currently experience surface water and river flooding. There is concern that this would worsen with the planned development, reducing quality of life, particularly :</p> <ul style="list-style-type: none"> the Horsleys; Send Marsh; Jacobs Well; River Wey; Keens Lane, and Tangle Lane 	<p>Planned development, both the strategic sites and the cumulative impact of smaller sites, will place extra pressure on existing infrastructure and will need new or improved infrastructure.</p> <p>The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure to needed support these sites.</p> <p>The IDP will be updated as further detail is available. Developer contributions (including the “pooled” Community Infrastructure Levy), planning contributions and other funding sources will be used to ensure that key</p>

Issue	Guildford Borough Council Response
<p>School infrastructure to serve the borough is already inadequate or under pressure and would worsen with the planned development, particularly :</p> <ul style="list-style-type: none"> • specialist schools; • primary and secondary schools local to Horsley, • Stoughton; • Worplesdon; and • Effingham <p>Existing school infrastructure is already inadequate / under pressure, which the planned housing will worsen, reducing quality of life:</p> <ul style="list-style-type: none"> • Ockham • Cranmore & Glenesk • Send Nursery school • West Clandon site is prone to flooding • Specialist schools need improvement • Send Marsh • Burntcommon • Burpham • Merrow • Stoughton • West Clandon • Object West Clandon school • Normandy • Ripley • Wisley • Primary school provision • Fairlands • George Abbott • Wyke School • Ash & Tongham • Wyke needs a primary school • Primary School provision • No mention of secondary schools in early drafts of the plan • Identified need for Secondary school provision in Woking • Late inclusion of two Secondary School evidence of failure to cooperate • No School at site 66 due to land constraints • 6th Form college in Guildford 	<p>supporting infrastructure is delivered to be available when it is needed.</p> <p>We are working with Surrey County Council's School Commissioning Team and its Planning and Highways Officers to ensure there are sufficient school places available in the borough in suitable locations when needed.</p>

Issue	Guildford Borough Council Response
<ul style="list-style-type: none"> • Glensesk / Cranmore private schools • Guildford centre • Alternative site for a school in this area- the Burnt Common auction/warehouse • The Raleigh School is already full 	
<p>Schools should be near planned development; Gosden Hill Farm not Clandon.</p>	<p>We are working with Surrey County Council to plan for new schools close to the planned housing, to minimise need to travel .</p>
<p>Existing water supply and / or waste water infrastructure is already inadequate and would worsen with the planned development, particularly in the Horsleys, reducing quality of life :</p> <p>backflow of sewage when it rains in East Horsley, and cannot use toilets or shower for some hours until it drains away, Gravetts Lane, Liddington Hall, Fairlands, North West Guildford, Worplesdon, Tongham, Normandy & Flexford, Ripley, Ockham, Wyke, Ockham Road North/Green Lane, Jacobs Well, A320, Tangle Lane, Ockham Mill, East Horsley, West Horsley, Riverwey, Effingham, Send, Riverwey, Glaziers Lane sewer capacity, Water bubbling out of manhole covers, Guildford centre and West Clandon, Broad Street Common.</p>	<p>We cannot require developments to contribute to resolving existing infrastructure shortfalls due to the legal tests that a planning obligation are subject to, i.e. that the planning obligation is:</p> <ul style="list-style-type: none"> • necessary to make the development acceptable in planning terms, • directly related to the development, and • fairly and reasonably related in scale and kind to the development. <p>Once we have introduced the Community Infrastructure Levy, we can use the CIL to fund improvements to infrastructure that would be worsened by new development, as well as providing new infrastructure.</p>
<p>The borough's roads and on-street parking is currently inadequate and would worsen with the planned development, reducing quality of life. Housing number should therefore be lower.</p> <p>Particular concerns about:</p> <ul style="list-style-type: none"> • Plan does not take into account developments in other authorities • Pollution and hazards Guildford Town centre office parking • Traffic congestion will more than double • HGV on narrow roads • The increased car and heavy vehicle traffic that would be caused by the industrial land off London Road (Site 74) and houses off Sendmarsh Road (Site 76) would mean my children will not be able to cycle to school or play on Send marsh Green in safety. • Narrow roads • Fix pot holes • Strategic plan for south of Guildford • Roads gritting inadequate • Two parking spaces per house • Meadowlands roads poor quality, no street lighting • 10 years significant increase in traffic • Roads are outside Borough authority control 	<p>The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'. Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Transport Strategy and IDP may therefore be updated to include these.</p> <p>As planning applications are considered for the sites identified in the new Local Plan, additional transport schemes to address site access and other localised issues may be secured.</p> <p>The strategic transport assessment assesses the impact of planned growth to 2033 and the impact of infrastructure proposed in the Infrastructure Schedule in mitigating the impact of the planned growth. The assessment takes account of forecast growth external to Guildford borough.</p> <p>A Sustainable Parking Strategy for Guildford 2016 is being prepared by the Council to complement the 'Proposed Submission Local Plan: strategy and sites', the Guildford Borough Transport Strategy and other strategies endorsed or adopted by</p>

Issue	Guildford Borough Council Response
<ul style="list-style-type: none"> • Busier roads will be harder for the elderly to navigate • Residential areas 20mph speed limit • Emergency services access will get poorer • A road traffic volumes 64% higher than UK average • Transport impacts across local authorities • Improve accessibility of town centre, railway station, University, Research park and Guildford Business Park • Roads will deteriorate faster with more people using them • Increase in HGV traffic on The Street, West Clandon • Guildford's roads network is completely rural - not enough consideration to the impact on roads the new schemes would entail. • Road infrastructure around Guildford is already at breaking point, to increase the housing and population in the area is madness in the extreme. The quality of life will be dreadful due to the stress of unbearable traffic. • The increase in housing outlined in the Draft Local Plan will have a catastrophic effect on the infrastructure of the Borough and is totally unsustainable in every conceivable aspect <p>Concerned about areas such as: East Horsley, General congestion through the borough, particularly at rush hours, Merrow Business park and Slyfield, Send, Jacobs Well, Guildford centre, Fairlands, through traffic on narrow roads in in the Horsleys; Ripley, Normandy, Effingham, West of Guildford, North West Guildford, Wood Street Village, Compton, Cobham, Worplesdon, Burpham, Ash and Tongham, Gosden Hill, Wisley, East and West Clandon, Burntcommon, Chilworth, Shalford, Farncombe, Send Marsh, Merrow and Ockham and the Merrow Business Park and Slyfield Industrial Estate.</p> <p>Concerned about road network, such as: Major road networks such as the A3 and M25 and Green Lane, Long Reach, The Street, Ripley Lane, A246, A247, A281, A3100, A320, A321, A324, A331, Addison Road, Aldershot Road A323 A322, Ash Street, B2039, B2039, B2234, B3000, Bagshot Road, Blacksmith Lane, Bookham, bottle neck Bramley and Shalford, Chilworth, Chinthurst Lane, Clay Lane, Cobham Way, East Horsley; East Lane, East Lane and Ockham Road, Effingham Common Road, Farnham Road; Flexford Lane, Forest Road, Frog Grove Lane/Park Barn/Rydes Hill roundabout is hugely congested, Glaziers Lane, Grange Road, Halfpenny Lane, Blacksmith Lane, and Chilworth, A31 Hog's Back, Keens Lane, Liddington Hall Avenue, Liddington Hall Drive, Liddington New Road, Lower Road, Mount Pleasant Way, Ockham Road North, Ockham Road South, Papercourt Lane, Park Barn, Polesden Lane, repair</p>	<p>Guildford Borough Council. This will address the key on-street and off-street car parking issues in the borough.</p>

Issue	Guildford Borough Council Response
<p>Green Lane, Ripley Lane, Ripley Lane structurally damaged, Rydes Hill Road, Saltbox Road to A3, Send, Clandon Road, Send Barnes Lane, Send Marsh Road, Send Road, Tangley Lane, Gravetts Land and Keens Lane, Tannery Lane, through traffic in Send particularly Potters Lane; Tithebarns Lane, town centre gyratory, Walnut Tree Close at rush hours, West Horsley (A246, B2039 and The Street), Westwood Lane, Glaziers Lane, Woking Road, Wood Street Village, Woodbridge Road, Worplesdon Road and, York Road to Woodbridge Road made worse by Waitrose.</p> <p>Concerned about car parks and car parking, such as: A3/ A25 Parkway, affordable self contained university with parking, East and West Horsley parking (particularly shops), Effingham common carpark objection, Horsley station car park, Maintain or improve parking around town centre, Mill Lane / Ockham park roundabout, Ripley parking, Royal Surrey County Hospital parking, Send parking, Station car park at capacity including Horsley, Effingham, Effingham Common carpark for those using the facilities Guildford, Worplesdon and Flexford stations, surface carparks should be changed to multi storey, Village parking lacking and West Horsley parking.</p> <p>Concerned about junctions, such as: Burntcommon roundabout, Shere Road/ Dorking Road junction, level crossing at Ash Station, B3000 to A31 needs better links, Pedestrian crossing lights add to congestion, Merrow/Burpham interchange, M25 junction with M3, Bridge at Ash level crossing, A31 junction to serve west Guildford, Improve A3 junctions, including; A3 junction A320 Meadow, A3/A31 junction, A325/A3 junction, A246 to A3, A3 Wooden Bridge junction, A3 Riply junction, access to/from Burpham, Send A3 slip road, A3 junction with Cathedral, Royal Surrey County Hospital, Surrey Research Park and Dennis roundabout.</p> <p>Concerned about cycle paths, such as: A3/A25 Bridge for cyclists, Thatchers Hotel A246</p> <p>Suggestions made, such as: A3 Blackwell Farm site junction required, Underground parking for new development (within 2 miles of town centre), New town alongside A3, Western access to Guildford, No land safeguarded for the diversion of traffic from the town centre, Guildford ring road, Tunnel from Shalford Meadows to London Road, No access to A3 northbound apart from A3, Tunnel A3 from junction A31 to Slyfield / Burpham, Tunnel similar to Hindhead and A281 to have junction off A3 at</p>	<p style="text-align: center; opacity: 0.5; font-size: 48px; transform: rotate(-45deg);">Draft</p>

Issue	Guildford Borough Council Response
<p>Shackleford, Town needs a Ring Road, A new bridge over the river in Guildford town centre, appears feasible, but a better north -south link through the gap in the North Downs is necessary, Widening of bridge and tunnel at Lakeside Road/Vale Road was promised and forgotten as part of Lakeside Road housing development, adequate land should be safeguarded to permit diversion of traffic from the town centre.</p>	
<p>Existing public transport / cycling / pedestrian infrastructure is already inadequate / under pressure, which the planned housing will worsen, reducing quality of life :</p> <ul style="list-style-type: none"> • South West Trains stated their network does not permit addition of extra trains • Pavements unsafe for pedestrians, wheelchair users • Pedestrian signage • Zebra crossings needed • Town centre pedestrianised • Safer routes to schools • River Wey should be used more • Urban transit system (light rail, trams, cable cars, ultra pods) required • Bicycles allowed on trains increased, including peak times • Traffic lights favouring pedestrians • Need trains to run later to Guildford from London • Trains from Cobham, Horsley, Woking full, standing room only most of the time • Use of brownfield site obviate the need for commute into town • Inadequate rail network and parking at Horsley and Clandon • Vehicles mounting pavements in West Clandon • Improve park and rides • Changes to bus routes needed • Villages unsuitable for bus transport • Elderly experience problems • Large increase in cyclists • Public transport patchy • New bus station in town centre (bus hub) • Send bus service • Worplesdon bus service • Worplesdon trains crammed • Improve bus services • Improve bus services in town centre • Improve train network 	<p>The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'. Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Transport Strategy and IDP may therefore be updated to include these.</p> <p>As planning applications are considered for the sites identified in the new Local Plan, additional transport schemes to address site access and other localised issues may be secured.</p> <p>The strategic transport assessment assesses the impact of planned growth to 2033 and the impact of infrastructure proposed in the Infrastructure Schedule in mitigating the impact of the planned growth. The assessment takes account of forecast growth external to Guildford borough.</p> <p>The 'Proposed Submission Local Plan: strategy and sites' includes Policy I3 Sustainable transport for new developments.</p>

Issue	Guildford Borough Council Response
<ul style="list-style-type: none"> • Improve pavements outside the town centre • Sustainable transport encouraged • Cycling encouraged • Walking encouraged • Public Transport encouraged • Grange Road Stoughton cycle route • Pedestrian route between station and town centre • Fast train link from Send to London • Unsafe to walk due to increase traffic and speed • Cycling unsafe due to narrow roads • Cycling to work is unsuitable for the very young, the elderly, the disabled and the unfit • Loss of bus station • Integrate bus station with train station • Country buses access to Guildford station • No location given of future bus station • Guildford station needs more parking/less congestion • Moving Guildford bus station will discriminate against elderly • Trains overcrowded during peak times • Village car parks • Site locations forcing people to drive to schools and doctors • Safety of pedestrians • Ripley • Rural roads no of few footpaths • Pavements in Horsley inadequate • East Horsley pavements need improvement • Bus service in Horsley inadequate • Increase traffic unsafe for cyclists • New bridge over River Wey • New bridge from station to Cathedral Hill or University • Pavement for pedestrians on lanes a priority • Normandy and Flexford • Affordable bus routes • Affordable train fares • Bus/train interchange needs to be improved • Improve pedestrian through put from town centre to station • Effingham train station (at capacity) 	<p style="text-align: center; font-size: 48px; opacity: 0.3; transform: rotate(-45deg);">Draft</p>

Issue	Guildford Borough Council Response
<ul style="list-style-type: none"> • Clandon • Ockham • Cycle route from Send to Old Woking • Cycle route do not meet up, need improvement • Cycling safety • Cycling on traffic free routes • Cycle route Guildford to Shalford need repairing • Cycle routes in remodelled Gyrotory system • Cycle routes through town centre • Cycle routes over A25/A3 • Cycle routes Middleton industrial estate • Cycle route A320/A25 crossroads • Cycle routes A331/A31 improved • Cycle lane entry to all Advanced Stop Boxes • Signage stating “No Overtaking of Cyclists” when road is narrow and shared • Rural Guildford inadequate • West Horsley local public transport • University of Surrey Train stop • Surrey Research park train stop • Bellfields train station • Park Barn train station • Park Barn station not viable • Merrow train station • Need station Burpham/Merrow • Flexford train station • Send train station needed • Brookwood railway station • Cobham train station over crowded during rush hour • Guildford town centre study for use of University park and ride as train stop • Chilworth • Shalford • Park and ride in north of Guildford • Heathrow rail link • Traffic free cycling routes • Keens Lane pedestrian usage, no footpath or street lighting • Bus station unsafe place to be 	<p style="text-align: center; font-size: 48px; opacity: 0.3; transform: rotate(-45deg);">Draft</p>

Issue	Guildford Borough Council Response
<ul style="list-style-type: none"> • Community transport lacking • Plenty of green space and footpaths not properly maintained • Reintroduce School Bus • Park and ride at Blackwell Farm will not work • Transport development – not “where feasible” • Car sharing encouraged • Bus service link between East Horsley / Cobham • More park and rides • Crossing ridgemoat to Guildford Park car park unsafe for wheelchair users • Likelihood two new train stations • Footbridge at bottom Guildford High Street to release congestion • Park and ride don’t work as roads are congested • Wyke school pavements dangerous for pedestrians • Howard of Effingham school • Bus fares are far too high, particularly for a family travelling together. At the moment people choose to sit in their cars - often in long traffic jams - because there is no safe and cost-effective alternative. 	
<p>If you want to create as you say 'an environment where people can move around easily on foot to access everyday needs', then you should be building on existing brown field sites in Guildford town centre where people can walk to work and access services on foot.</p>	<p>Analysis of potential development sites we cannot meet our Objectively Assessed Housing Need within Guildford town centre.</p>
<p>Object large potential sites for building seems to be preferred by GBC possibly so as to get funding for infrastructure</p>	<p>The spatial strategy is not based solely on infrastructure provision, but considers national policy regarding extensions to urban areas, making villages more sustainable.</p>
<p>Funding for the new / improved infrastructure is lacking/unclear</p> <ul style="list-style-type: none"> ○ Adequate funding to provide safe roads ○ potential sources of funding are identified for each improvement and included in the schedule ○ infrastructure contributions should only be sought where compliance with the CIL Regulations is achieved. 	<p>Planned development, both the strategic sites and the cumulative impact of smaller sites, will place extra pressure on existing infrastructure and will need new or improved infrastructure.</p> <p>The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'. Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Transport Strategy and IDP may therefore be updated to include these.</p>

Issue	Guildford Borough Council Response
	<p>As planning applications are considered for the sites identified in the new Local Plan, additional transport schemes to address site access and other localised issues may be secured.</p> <p>Developer contributions (including the “pooled” Community Infrastructure Levy), planning contributions and other funding sources will be used to ensure that key supporting infrastructure is delivered and made available when it is needed.</p>
<p>Scale of development proposed combined with development planned elsewhere is likely to have a significant impact on infrastructure across the wider area</p> <ul style="list-style-type: none"> • Elmbridge • Waverley (SANGs/SPAs); Site 80 requires DtC with Waverley Borough 	<p>In preparing our new Local Plan we are working with neighbouring boroughs through the Duty to Co-operate. Elmbridge has adopted its Core Strategy some years ago, which includes delivery of its relatively low South East Plan housing number, and Waverley does not yet have a Local Plan.</p>
<p>The infrastructure will not be able to support your plans in : Horsley & Ockham, Send, Send Marsh, Burnt common, North Guildford, Keens Lane, Tangle Lane, Gravetts Lane, Liddington Hall, West Horsley, Ockham Road North, Burpham, Worplesdon, Ripley, West Clandon, North borough Wisley,</p> <p>Transport studies zero population, Horsley, Effingham, Normandy, Blackwell Farm, East Horsley, Wisley, Fairlands, Stoughton, Replacement of car by cycles overstated by many studies and Guildford centre.</p> <p>Lack of detail of who would provide the additional infrastructure in :</p> <ul style="list-style-type: none"> • Wisley, Gosden Hill, Blackwell Farm • Horsley • West Clandon • Suitable transport for affordable housing • A3 capacity • Send • Town centre • North east of borough • Future revisions consult with Highways agency • Utility companies need to be consulted on available capacity • Underground car parks • Impact survey • Effingham • Council has little or no control over when or where critical infrastructure will be implemented as the power to do this resides with other external agencies • Local Plan at odds with the Government Infrastructure plan 	<p>Planned development, both the strategic sites and the cumulative impact of smaller sites, will place extra pressure on existing infrastructure and will need new or improved infrastructure.</p> <p>The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure to needed support these sites. The IDP will be updated as further detail is available.</p> <p>Developer contributions (including the “pooled” Community Infrastructure Levy), planning contributions and other funding sources will be used to ensure that key supporting infrastructure is delivered to be available when it is needed.</p> <p>The strategic transport assessment assesses the impact of planned growth to 2033 and the impact of infrastructure proposed in the Infrastructure Schedule in mitigating the impact of the planned growth. The assessment takes account of forecast growth external to Guildford borough.</p>

Issue	Guildford Borough Council Response
<ul style="list-style-type: none"> • Unbuilt university commitments from 2003 omitted • Highways Agency study, options improving A3, transport and service plan needed • Ockham • Ripley • GTAMS as starting block on traffic flow needs work • A246 and A3 from Send to Wisley, What assessment of traffic by consultants • Baseline infrastructure analysis on basis of no growth • Options Growth Scenarios Transport Assessment report is one of four key evidence documents that will inform the IDP 	
<p>Infrastructure report published for consultation is largely incomplete</p>	<p>The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure to support the planned development which is expected to place extra pressure on existing infrastructure, or to need new or improved infrastructure. The IDP will be updated as further detail on supporting infrastructure is available.</p> <p>Developer contributions (including the “pooled” Community Infrastructure Levy), planning contributions and other funding sources will be used to ensure that key supporting infrastructure is delivered to be available when it is needed.</p>
<p>Thames Water support the policy in principle, but consider that a specific policy is required in the new Local Plan in relation to water and wastewater/sewerage infrastructure to guide developers.</p> <p>Thames Water recommend that developers engage with them at the earliest opportunity to establish the following:</p> <ul style="list-style-type: none"> • The developments demand for water supply infrastructure both on and off site and can it be met; • The developments demand for wastewater infrastructure both on and off site and can it be met; and • The surface water drainage requirements and flood risk of the development both on and off site and can it be met. 	<p>We do not consider it appropriate to include a specific policy on water supply and treatment infrastructure in a strategic policy and sites Local Plan.</p> <p>This is detailed planning policy, and could potentially result in a separate policy for each type of infrastructure.</p> <p>Specific site allocations policies and the Infrastructure Schedule appended to the Local Plan include details of specific sites needing further capacity studies or upgrades.</p>
<p>South East Water supplies the far west of the borough (Tongham and Puttenham) and may need to reinforce its network to support growth, but confirms that its published planned programme will be fully able to satisfy growth in demand in the zones.</p> <p>South East Water Ltd We have a comprehensive forecast, developed by Experian, together with</p>	<p>Adequacy of existing infrastructure capacity is noted.</p>

Issue	Guildford Borough Council Response
<p>neighbouring companies, of growth estimates in population and households.</p> <p>For Guildford in particular, our forecasts include a growth estimate of 180 households over the period 2012 to 2020, 570 households over the period 2012 to 2030, and 1100 households over the period 2012 to 2040</p> <p>Our WRMP assumes there will be around 500 new homes up to 2031 across the area of Guildford we supply.</p> <p>Your Core Strategy requirement of 13,040 new homes up to 2031 significantly exceeds this, but we only supply the far west of the borough. We note the expected development planned in the Tongham and Puttenham areas and should make you aware that we may need to reinforce our network to support growth in these areas. However, we have completed sensitivity testing on our plans using the higher housing numbers provided and we can assure you that in the context of our current water resource plan, we are able to confirm that our published planned programme will be fully able to satisfy the growth in demands in the zones.</p>	
<p>Support exit road Slyfield Industrial Estate</p>	<p>Comment noted.</p>
<p>Guildford station car park changed to bus station</p>	<p>Comments noted.</p> <p>The site allocation in the 'Proposed Submission Local Plan: strategy and sites' requires that "Bus interchange facilities presently provided at Guildford bus station on the site are to be provided in a suitable alternative arrangement to be located either partly or wholly on or off site" and that "If alternative arrangement involves on-street provision of bus stops and waiting facilities within the town centre, consideration is required of interactions with other uses such as North Street market, vehicular access and parking, movement and crossings for pedestrians, and the quality, character and setting of the town centre environment".</p> <p>New Guildford town centre bus facilities is scheme BT2 in Appendix C Infrastructure Schedule.</p>
<p>Park and ride to start earlier to help commuters</p>	<p>A Sustainable Parking Strategy for Guildford 2016 is being prepared by the Council to complement the 'Proposed Submission Local Plan: strategy and sites', the Guildford Borough Transport Strategy and other strategies endorsed or adopted by Guildford Borough Council. This will address the key on-street and off-street car parking issues in the borough.</p>
<p>Reducing vehicular traffic in favour of more sustainable forms of transport would result in better quality public realm and would improve the experience of Guildford</p>	<p>The National Planning Policy Framework states that "The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice</p>

Issue	Guildford Borough Council Response
and rural settlements	<p>about how they travel. However, the Government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas.” (paragraph 29).</p> <p>The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the ‘Proposed Submission Local Plan: strategy and sites’. Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Transport Strategy and IDP may therefore be updated to include these.</p>
How can you prepare a local plan without an Infrastructure Delivery Plan?	An IDP sets out the infrastructure that needs to be provided to support a new Local Plan.
The supporting infrastructure needed to enable development must be in place before the development taking place	Draft Policy I1 includes requirement for supporting infrastructure to be in place before first needed. We will consider adopting a CIL Instalments Policy to secure this.
Proposed level of housing in Send is too much for the infrastructure to cope, including road congestion	<p>The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the ‘Proposed Submission Local Plan: strategy and sites’. Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Transport Strategy and IDP may therefore be updated to include these.</p> <p>As planning applications are considered for the sites identified in the new Local Plan, additional transport schemes to address site access and other localised issues may be secured.</p> <p>The strategic transport assessment assesses the impact of planned growth to 2033 and the impact of infrastructure proposed in the Infrastructure Schedule in mitigating the impact of the planned growth. The assessment takes account of forecast growth external to Guildford borough.</p>
Need overnight parking for HGVs within easy access to the A3 and A31, properly run, with washing and toilet facilities	A Sustainable Parking Strategy for Guildford 2016 is being prepared by the Council to complement the ‘Proposed Submission Local Plan: strategy and sites’, the

Issue	Guildford Borough Council Response
	Guildford Borough Transport Strategy and other strategies endorsed or adopted by Guildford Borough Council. This will address the key on-street and off-street car parking issues in the borough.
Link road starting from the A3100 Portsmouth Road just south of St Catherine's, and Linking across the valley to the A281 Shalford Road. From this a road would go northwards in tunnel parallel and immediately to the west of the railway Line, coming out between the railway Line and the multi-storey car park, going under the Farnham Road, under the station footbridge, then turning right under the railway, (which is on an embankment at this Location), then Left going northwards through Woodbridge Meadows industrial estate, joining and crossing at surface Level the A25 and joining the A1 at a new roundabout junction.	The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'. Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Transport Strategy and IDP may therefore be updated to include these.
Surrey County Council is particularly interested in implications of the draft Local Plan for infrastructure for which the council is the provider, especially transport and education.	We will continue to work with county officers to develop the Infrastructure Delivery Plan and Infrastructure Schedule to identify in more detail the additional infrastructure and mitigation measures needed to deliver Guildford borough's planned growth.
Surrey County Council's Surrey Waste Plan allocates part of Wisley former airfield for waste management use and there is an existing planning permission for a waste management facility. The implementation of Surrey's waste strategy as set out in the waste local plan could be prejudiced unless provision for a strategic waste facility is retained on part of the site.	The new owners of the Wisley former airfield site allocated for waste development have advised that they will not make it available for waste development, so it would fall to SCC to Compulsory Purchase the land if they considered it necessary to deliver their waste strategy. As we understand that this is not currently being planned for, the site is therefore considered available for an alternative use.
City and town dwellers need food grown locally to eliminate as many lorries on the roads as possible. They also need to visit the countryside to enjoy as a break from their everyday stresses.	We will ensure that suitable open spaces within towns and villages are protected from development. The 'Proposed Submission Local Plan: strategy and sites' includes sites in town to be allocated for allotments.
Transport Assessment for Development of four sites on Tannery Lane, Send, for approximately 287 dwellings and a canal basin. Concludes that Highway Authority has no principle objections subject to the satisfactory resolution of the issues raised in the submitted note and in Technical Pre-Planning response dated 11/07/2014.	Comment noted.
Keep a bus station in the town centre. Encourage commercial bus services - especially in hilly residential areas. Yes to a town centre 'shopper hopper' bus.	Comments noted. The site allocation in the 'Proposed Submission Local Plan: strategy and sites' requires that "Bus interchange facilities presently provided at Guildford bus station on the site are to be provided in a suitable alternative arrangement to be located either partly or wholly on or off site" and that "If alternative arrangement involves on-

Issue	Guildford Borough Council Response
	<p>street provision of bus stops and waiting facilities within the town centre, consideration is required of interactions with other uses such as North Street market, vehicular access and parking, movement and crossings for pedestrians, and the quality, character and setting of the town centre environment”.</p> <p>New Guildford town centre bus facilities is scheme BT2 in Appendix C Infrastructure Schedule.</p>
<p>A sustainable transport system will be crucial to the long-term success of the Plan, including car pool schemes</p>	<p>Comment noted.</p>
<p>Support sustainable movement corridor</p>	<p>Comment noted.</p>
<p>St Mark's Church, Wyke will need to expand its facilities if Normandy / Flexford is developed as suggested. We will need help with this. Facilities that will be needed include : building and adding amenity facilities such as disabled loos on site. In addition land would be required for car parking spaces.</p>	<p>We will work with the church, the Parish Council and infrastructure partners to ensure these upgrades are in place when needed. We will use developer funding (both CIL and S106 planning obligations)</p>
<p>Attention needs to be given to the deterioration caused by growing air, light, noise, and water pollution. The impact of the required extra growth of road and rail traffic infrastructure needed for the housing proposals in this plan is not adequately considered. Surrey is already the most overflowed county in England. We remain deeply aware of the uncertain development proposed for aviation at Gatwick and Heathrow.</p> <p>CPRE Surrey has warned against ill-advised airfield expansion at these two centres, and also at Biggin Hill, Dunsfold, Farnborough, Redhill and Wisley. Surface road and rail traffic will have to be increased if airfields are expanded by means of extra runways, or alternatively if they are replaced by new housing development.</p>	<p>We are not aware of any proposals to expand Wisley former airfield with additional runways, but we do agree that road and rail traffic will increase if this site is developed.</p>
<p>In our comments on the Infrastructure Baseline we identified that it would be helpful to identify capacity of different types of infrastructure. A third draft plan might provide this with traffic light coding to show where there is a reasonable amount of capacity (green), where the infrastructure is nearing capacity (yellow), and where it is already at or exceeding capacity (red).</p> <p>This would help to frame policies in specific areas that ensure there are adequate contributions or CIL allocations towards the creation of additional capacity. It would also go a long way towards explaining why some larger-scale developments would be desirable to deliver the required level of infrastructure, where piecemeal development on a small scale cannot. A further diagram (if not part of Q5b.1.2) should show all of the development sites</p>	<p>Whilst an interesting and initially attractive suggestion, analysis of capacity of existing infrastructure in most cases is complex, and cannot be reduced simply to three colours. Examples are school and road capacity, there are lots of influencing factors.</p> <p>Strategic developments, particularly at the edges of towns and where there is access by public transport are often potentially sustainable locations for new development (paragraph 84).</p> <p>See Key Diagram.</p> <p>The impact of many small developments is usually greater than the same amount of</p>

Issue	Guildford Borough Council Response
<p>allocated for development along with all proposed major infrastructure works.</p> <p>New housing should be built on brownfield sites where major infrastructure is already in place</p>	<p>development dispersed across a wide area.</p>
<p>With an aging population and the ability to provide volunteering opportunities that Guildford Cathedral provides, a permanent bus route to the Cathedral would be of enormous benefit to all parties.</p>	<p>Comment noted. Buses currently serve the adjacent Stag Hill University of Surrey site from the town centre.</p>
<p>SHMA out of date Brownfield should be used instead Target should be 300 homes per year Need to take account of infrastructure/constraints/local character May need to consider unmet needs from other authorities OAN higher than any other Surrey authority ONS data not correct</p>	<p>These comments have been responded to in Appendix C: Evidence Base</p>
<p>Other transport infrastructure and service comments.</p>	<p>Please refer to the table for the Comments on the Appendix B Infrastructure Schedule.</p>

Comments on Policy 18: Sustainable transport for new developments

Issue	Guildford Borough Council Response
<p>New rural development will be car dependent; lack of public transport, no cycle lanes, few footways, resulting in more traffic, accidents and air pollution.</p>	<p>The National Planning Policy Framework states that “The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel. However, the Government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas.” (paragraph 29).</p> <p>The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the ‘Proposed Submission Local Plan: strategy and sites’. Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Transport Strategy and IDP may therefore be updated to include these.</p> <p>Schemes AM2, AM4 and AM5, as included in the Appendix C Infrastructure Schedule, will realise the comprehensive Guildford borough cycle network</p>

Issue	Guildford Borough Council Response
	<p>programme of cycle improvements set out in Surrey County Council's Guildford Local Cycling Plan, plus off site cycle networks from both the Land at former Wisley airfield site and the Land to the south of Normandy and to north of Flexford site to key destinations.</p> <p>As planning applications are considered for the sites identified in the new Local Plan, additional transport schemes to address site access and other localised issues may be secured.</p> <p>The policy has been revised in the 'Proposed Submission Local Plan: strategy and sites' as follows: "We will expect new development to: • provide high-quality, safe and direct routes within permeable layouts that strengthen, facilitate and encourage short distance trips by walking and cycling ... • protect, enhance and improve existing cycle and walking routes, to ensure the effectiveness and amenity of these routes ..."</p> <p>In terms of the impact of new rural development on traffic, road safety and air pollution, the policy states that "We will expect new developments to demonstrate adequate provision to mitigate the likely impacts, including cumulative impacts, of the proposal on both the safe operation and the performance of the Local Road Network and Strategic Road Network. This provision should include the mitigation of environmental impacts, such as noise and pollution, and impact on amenity and health."</p> <p>There has been no exceedance of the Government's national air quality objectives at relevant receptors in Guildford borough. Accordingly, there are no Air Quality Management Areas.</p>
<p>Policy wording should be more forceful; e.g. replacing "expect" with "require"; unclear how Council will "facilitate".</p>	<p>The policy in the 'Proposed Submission Local Plan: strategy and sites' is considered to be consistent with national planning policy.</p>
<p>Need to improve network of dedicated cycle paths and cycle storage facilities; cycling has many benefits.</p>	<p>The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'.</p> <p>Schemes AM2, AM4 and AM5, as included in the Appendix C Infrastructure Schedule, will realise the comprehensive Guildford borough cycle network programme of cycle improvements set out in Surrey County Council's Guildford</p>

Issue	Guildford Borough Council Response
	<p>Local Cycling Plan, plus off site cycle networks from both the Land at former Wisley airfield site and the Land to the south of Normandy and to north of Flexford site to key destinations.</p> <p>The policy in the ‘Proposed Submission Local Plan: strategy and sites’ states that: “We will expect new development to: • provide high-quality, safe and direct routes within permeable layouts that strengthen, facilitate and encourage short distance trips by walking and cycling • provide secure, accessible and convenient cycle parking • protect, enhance and improve existing cycle and walking routes, to ensure the effectiveness and amenity of these routes ...”</p>
<p>Scale of proposed development is too much for local infrastructure, and will require new, large projects.</p> <p>Not tit-for-tat patchwork improvement close to developments.</p> <p>Need a plan that spans whole region.</p>	<p>Guildford Borough Council works closely with the key transport infrastructure and service providers to plan and support the delivery of appropriate improvements, including Surrey County Council as the Local Transport Authority, the principal bus and community transport operators, South West Trains and Great Western Railway, and Network Rail.</p> <p>The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the ‘Proposed Submission Local Plan: strategy and sites’.</p> <p>Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Guildford Borough Transport Strategy and IDP may therefore be updated to include these.</p> <p>As planning applications are considered for the sites identified in the new Local Plan, additional transport schemes to address site access and other localised issues may be secured.</p>
<p>A good bus network would be critical in reducing congestion and carbon emissions.</p>	<p>Guildford Borough Council works closely with the key transport infrastructure and service providers to plan and support the delivery of appropriate improvements, including Surrey County Council as the Local Transport Authority, the principal bus and community transport operators, South West Trains and Great Western Railway, and Network Rail.</p> <p>Bus services in the borough and beyond are operated by a number of bus operators, the principal operators being Stagecoach, Arriva and Safeguard. Bus operators run many commercial bus services at their own financial risk. Surrey</p>

Issue	Guildford Borough Council Response
	<p>County Council works in partnership with operators to deliver improvements to their services. Surrey County Council also commissions socially-necessary bus services.</p> <p>Surrey County Council, as the Local Transport Authority and the Local Highway Authority, as they develop schemes for the local road network, will have regard to the routing of existing and potential future bus services in so doing.</p> <p>The 'Proposed Submission Local Plan: strategy and sites' sets the following context for future decisions by bus operators and Surrey County Council on the routing of bus services in Guildford town centre:</p> <ul style="list-style-type: none"> • Site allocation policy A6: North Street redevelopment, Guildford. This includes requirements as to the future provision of bus interchange facilities • Site allocation policy A7: Land and buildings at Guildford railway station, Guildford. This includes requirements as to the future provision for buses • New Guildford town centre bus facilities (schemes BT2) in Appendix C Infrastructure Schedule • Sustainable Movement Corridor schemes (schemes SMC1, SMC2, SMC3, SMC4, SMC5 and SMC6) in Appendix C Infrastructure Schedule. These will provide the opportunity for rapid and reliable journeys by bus along the route, or part of the route, of the Sustainable Movement Corridor in Guildford town centre.
<p>New development should mitigate the impact on the Local and Strategic road networks.</p>	<p>This aspect of the policy has been revised in the 'Proposed Submission Local Plan: strategy and sites' as follows: "We will expect new developments to demonstrate adequate provision to mitigate the likely impacts, including cumulative impacts, of the proposal on both the safe operation and the performance of the Local Road Network and Strategic Road Network."</p>
<p>The first sentence in paragraph 2 of Policy 18 should be updated to read: "We will expect new developments to demonstrate adequate provision to mitigate the likely impacts, including cumulative impacts, of the proposal on the performance and safe operation of the Local Road Network and Strategic Road Network."</p>	<p>Comment noted.</p>
<p>Policy should say that new developments will only be permitted if it can be demonstrated that they do not negatively affect the Local and Strategic road networks.</p>	<p>The suggestions are not consistent with paragraph 32 of the National Planning Policy Framework. This states that "Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe."</p>
<p>Further traffic is not an option, too congested, and too many fatalities already.</p>	
<p>Unrealistic policy.</p>	<p>The policy in the 'Proposed Submission Local Plan: strategy and sites' is considered to be consistent with national planning policy. Some changes have been made in response to representations made, discussions including with councillors and a Ministerial statement in March 2015 with respect to justification for parking standards (https://www.gov.uk/government/speeches/planning-update-march-2015).</p>

Issue	Guildford Borough Council Response
Language used in policy needs to be clearer.	Various aspects of this policy have been revised in the 'Proposed Submission Local Plan: strategy and sites'.
A vision for a 50% non-car mode share to be achieved by the end of the plan period should be included in the policy.	The policy as drafted in the 'Proposed Submission Local Plan: strategy and sites' is considered to be consistent with national planning policy and guidance.
<p>The thresholds proposed to trigger the requirement for a Transport Assessment or Transport Statement are excessively low compared to DfT's Guidance on Transport Assessments (March 2007) and Surrey County Council's Transportation Development Control Good Practice Guide (2006 with updates after October 2009).</p> <p>Suggested new text for policy: "We will expect new larger development, defined as:</p> <ul style="list-style-type: none"> • 20 or more dwellings or 0.5 hectares or more for residential development, and/or • One or more hectares for other development <p>To demonstrate that they have endeavoured to maximise the opportunities for sustainable travel appropriate to the infrastructure and will make adequate provision to mitigate the likely impacts through provision of a Transport Assessment and a Travel Plan".</p>	This aspect of the policy has been revised in the 'Proposed Submission Local Plan: strategy and sites' as follows: "We will expect all sites that generate significant amounts of movement to be supported by a Transport Statement or Transport Assessment. It will be for the Local Planning Authority, having liaised with Surrey County Council the Local Highway Authority and where relevant with Highways England, to determine whether a Transport Statement or Transport Assessment is required."
Threshold for transport study is too low.	
Would like to see references in this chapter to measures including "smart ticketing initiatives for public transport" and those being delivered along "quality bus corridors", such as bus priority measures, high quality passenger facilities, electronic passenger information and strong marketing.	It is considered that the role of new development in realising the suggested improvements is already adequately captured by the wording of the policy thus: "We will expect new development to: ... • secure appropriate improvements to public and community transport, including infrastructure and park and ride requirements".
Many potential incentives for increasing public transport use are outside the control of Guildford Borough Council, such as subsidies and new rail stations.	<p>Guildford Borough Council works closely with the key transport infrastructure and service providers to plan and support the delivery of appropriate improvements, including Surrey County Council as the Local Transport Authority, the principal bus and community transport operators, South West Trains and Great Western Railway, and Network Rail.</p> <p>The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'. This includes the two new rail stations at Guildford West (Park Barn) and Guildford East (Marrow), respectively schemes NR2 and NR3.</p>
New infrastructure needs to be supported by effective travel information and awareness raising initiatives.	This aspect has been included within paragraph 4.6.27 of the Reasoned Justification for the policy in the 'Proposed Submission Local Plan: strategy and sites' as follows: "Measures designed to encourage people to make sustainable travel choices can assist with reducing these impacts. Such measures can include ... the marketing and promotion of sustainable travel choices, for instance the provision of resident travel information packs."

Issue	Guildford Borough Council Response
<p>Cycle parking for adult tricycles as well as general cycle parking should be considered as adult tricycles can be used by those with disabilities or older people concerned about their balance.</p>	<p>This aspect has been included within paragraph 4.6.27 of the Reasoned Justification for the policy in the 'Proposed Submission Local Plan: strategy and sites' as follows: "Measures designed to encourage people to make sustainable travel choices can assist with reducing these impacts. Such measures can include ... the provision of cycle infrastructure, pedestrian wayfinding and cycle parking, including for adult tricycles which can be suitable for those with disabilities and older people concerned about their balance..."</p>
<p>Road alterations required for each site should be provided.</p>	<p>The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'.</p> <p>Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Guildford Borough Transport Strategy and IDP may therefore be updated to include these. As planning applications are considered for the sites identified in the new Local Plan, additional transport schemes to address site access and other localised issues may be secured.</p> <p>As planning applications are considered in future for the sites in the 'Proposed Submission Local Plan: strategy and sites', additional transport schemes to address site access and other localised issues will additionally be secured.</p>
<p>Bus is very expensive</p>	<p>Comments noted.</p>
<p>Recent developments based on no / lower car parking provision does not work, it results in heavy on street parking</p>	<p>This aspect of the policy has been revised in the 'Proposed Submission Local Plan: strategy and sites' as follows: "We will expect new development to: ... • provide off-street vehicle parking for both residential and non-residential developments at a level which prevents overspill parking on the public highway where there is a clear and compelling justification that it is necessary to manage the Local Road Network • within or adjacent to Controlled Parking Zones A, B, C and D where there is existing on-street parking stress, planning permission for residential developments will be subject to a planning obligation to require that future occupants will not be eligible for on-street residents parking permits"</p> <p>These changes have been made in response to representations made, discussions with councillors and a Ministerial statement in March 2015 with respect to justification for parking standards https://www.gov.uk/government/speeches/planning-update-march-2015</p>
<p>Developer contributions should be spent to mitigate harm caused by the</p>	<p>Direct harm caused by proposed development can continue to be addressed by</p>

Issue	Guildford Borough Council Response
development, not spent on problems elsewhere, even if the CIL regulations allow this.	S106 planning obligations. S106s will continue to be used to make a scheme acceptable in planning terms. CIL will be in addition to this.

Comments on Policy 19: Green and blue infrastructure

Issue	Guildford Borough Council Response
This policy is welcome.	Comment noted.
Protect green and blue infrastructure due to its heritage significance.	Policy 14 provides protection for green and blue infrastructure. The heritage elements of green and blue infrastructure are addressed under policy D3: Historic Environment.
No need to improve protection.	The NPPF requires Local Plans to set out a strategic approach “planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure”.
Normandy safeguarded land is a key link between AONB and SSSI which houses many forms of wildlife.	The safeguarded land at Normandy is not adjacent to either the AONB or a SSSI. The land is proposed for development in the ‘Proposed Submission Local Plan: strategy and sites’ and will be subject to a planning application which examine impacts on biodiversity, among other considerations.
It is incorrect that the only driver/mechanism for delivery of green infrastructure is as SANG. Will development provide new green infrastructure?	Policy 14 considers the delivery of SANG to be a significant mechanism for new green infrastructure. The Local Plan proposes a significant amount of new SANG so it is considered that this assessment is correct. However, the policy also considers other drives, such as new open space and biodiversity measures delivered as part of development proposals.
Town Centre developments should have as much access to green space as possible. Land around River Wey should be kept as outdoor space. Access to the river Wey should be increased without residential development blocking access to tow paths Creation of a tow path on the east side of the River Wey would be a huge benefit. GVG propose opening up walking paths through a riverside park.	The ‘Proposed Submission Local Plan: strategy and sites’ proposes four new SANGs accessible from the town centre (Tyting Farm, Burpham Court Farm, Blackwell Farm and Gosden Hill Farm). Existing open spaces in and around the town centre are protected by Policy 14. The Council is currently looking at proposals for redevelopment of the town centre, which may include a significant new green space alongside the River Wey in the town centre and other changes to open up access to the river. We will consider whether these proposals should be taken forward as part of a town centre Area Action Plan. Existing open space is protected by the NPPF.
Already lost too much green space. We will lose the last of our local wildlife.	The objective of Policy 14 is the delivery of net gains in biodiversity.
The language in Policy 19 is overly aspirational or is meaningless/vague. The policy needs further development. The policy needs to be workable so as to encourage investment.	Policy 14 shows significant development from policy 19 (as named in the draft Local Plan Strategy and Sites 2014). The policy is now clearer and more detailed and the requirements placed on development proposals are clearer.

Issue	Guildford Borough Council Response
The supporting text for Policy 19 contradicts itself about status of studies.	The contradiction was a typographical error and has been removed in policy I4.
Policy 19 does not make it clear how green infrastructure is actually going to be delivered.	Policy I4 is clearer and sets out that Green Infrastructure will be delivered through a combination of new SANGs, management of the Council's existing estate and through on and off-site provision delivered by development.
It is unlikely that all development (all types and scales) will be able to provide green infrastructure. "All development" includes minor domestic alterations - are householders really expected to provide 'additional green and blue infrastructure'.	Policy I4 now makes it clear that all development should provide net gains in biodiversity but that this should be appropriate and proportionate to the development, which includes considerations of scale. Guidance on how this can be achieved will be set out in the Green and Blue Infrastructure SPD.
The policy should be amended as follows (additional wording underlined): All development must aim to: <ul style="list-style-type: none"> • protect, enhance and provide integrated and accessible networks of green and blue infrastructure • enable good and appropriate public access to green and blue infrastructure • establish the creation of green and blue corridors and improve biodiversity • contribute to climate change adaptation. • enhance the amenity, landscape character and attractiveness of the borough • create pleasant and sustainable places in which to live in, work in or visit • provide additional green and blue infrastructure, including outdoor recreational space, of an appropriate type, standard and size, and make appropriate provision for future maintenance We will resist the loss of green and blue infrastructure in accordance with the NPPF, where it is not justified by other material planning considerations.	Policy I4 has been significantly rewritten and no longer uses this wording.
Policy 19 should not be used to restrict farm development- the policy should be re-worded to include an element of scale and proportion, and the conditions under which a limited impact may be acceptable.	Policy I4 does not prevent appropriate development on farms, where it accords with the requirements for biodiversity, blue infrastructure and open space. The policy includes criteria that sets out how potential impacts on designated sites should be treated.
The draft Local Plan is not compliant with government policy as Policy 19 does not include a natural environment policy. It needs re-writing to comply with the NPPF- 'aim' is weak and unenforceable.	Policy I4 has been rewritten to include more detail, and better address the natural environment in line with the requirements of the NPPF.
The Environment Agency suggests a number of changes to the supporting text of Policy 19 and clarification of the policy. Consider splitting biodiversity from open space in order to avoid biodiversity being sidetracked.	Policy I4 is substantially different from Policy 19 of the Draft Local Plan: strategy and sites 2014. We have incorporated the suggested wording changes where appropriate and added new sections to meet the aims of the remaining suggestions.
Biodiversity should be separated from the rest of green infrastructure.	Open space and green infrastructure have been kept together in the same strategic

Issue	Guildford Borough Council Response
	policy as the NPPF focuses on multi-functional green space that supports both biodiversity and recreation. The biodiversity element of the policy has been enhanced so will not be sidetracked.
(Regarding enhancement) Resist turning the countryside into urban parks.	Enhancement means improving biodiversity through measures like habitat management and creation. It does not mean changing the character of natural spaces.
Policy 19 does not include adequate protection for designated sites.	Policy 14 has been written to include specific protection for designated sites, in line with the requirements of the NPPF.
<p>The following sites should be designated as Local Green Space:</p> <ul style="list-style-type: none"> • Land North of Pewley down • Land parcel E23 • Manor Fruit Farm • Partridge Field, Beechcroft Drive • Land south of Kings Road, Shalford • Land behind Shalford bowls club • Land at 109 Epsom Road. <p>There is no mention of LGS in Send despite there being 2 nature reserves in proposed inset- Heathfield and Millennium Green Space (Bush Lane Woods).</p> <p>The following text should be added to the policy. “The Council will be proactive in seeking land that could be designated as Local Green Space.”</p>	<p>Policy 14 is a strategic policy and deals with biodiversity and open space at the strategic scale. The purpose of the Local Green Space designation is to protect spaces of local significance. Where proposals for Local Green Spaces meet the criteria set out in the NPPF, these will be designated through Development Management policies, or through neighbourhood plan policies.</p> <p>Policy 14 and the NPPF protect open space of public value. New open space within inset villages is identified on the proposals map. This space will be protected in accordance with the NPPF.</p> <p>This text has not been added as Local Green Space is not considered a matter for Local Plan strategy (see above). As Local Green Space is of local significance, it is considered more appropriate to ask local people, parish councils and community groups to put forward nominations for Local Green Space rather undertaking an assessment to seek it out. The Local Plan Strategy and Sites primarily uses the Open Space designation to protect spaces that are deemed important for local communities as these assets cumulatively form an asset of strategic importance. The spaces have been identified through the Open Space, Sports and Recreation assessment.</p>
<p>The Stonebridge site should become a wildlife refuge. The site is currently derelict and covered in rubbish, but supports a number of nature conservation interests The site is unsuitable for development. Developers in the town centre should be required to deposit soil from their construction work and remediate the site.</p> <p>The site should be remediated as a wildlife refuge. This would complete a green corridor link from Cranleigh Waters through to the Wey National Trust lands and provide a new resource for Bramley and Shalford .</p>	<p>We have not put this proposal in the ‘Proposed Submission Local Plan: strategy and sites’ because the plan deals primarily with the development and use of land. Providing a wildlife refuge on the site would be unlikely to require planning permission so a planning policy would not be effective. The site is not proposed to be removed from the Green Belt so will continue to be protected from development. The Council will produce an SPD that sets out how ecological networks can be enhanced, which may include proposals such as this.</p> <p>Generally, developer obligations should provide mitigation for the impacts of their own development. This site is in Council ownership so would more appropriately be addressed through the Council’s countryside management work, if the site is appropriate for use as a wildlife site. Your suggestions have been passed to the Council’s Parks and Countryside team.</p>

Issue	Guildford Borough Council Response
Policy 19 ignores the status of Whitmoor Common as an SPA and SSSI.	Policy 14 and new policy P5 protect the SPA, which includes Whitmoor Common (identified on the proposals map).
Policy 19 does not address biodiversity.	Policy 14 has been rewritten and now addresses biodiversity in more detail.
Wildlife should be protected	<p>Policy 14 requires the protection and enhancement of priority habitats that are identified in the Biodiversity Opportunity Area policy statements produced by the Surrey Nature Partnership. European, National and Local sites are specifically protected.</p> <p>The SPD will set out guidance by which the net gains in biodiversity will be delivered in areas not covered by the BOA approach. This work has not yet been undertaken but will aim to guide development towards proposals that protect and enhance wildlife habitat.</p>
Council owned farms should be protected	Council owned farms are in the Green Belt and protected by Green Belt policy.
<p>Tree planting and woodland creation should be part of the new developments</p> <p>Ill-thought tree planting could make habitats for biodiversity worse</p> <p>The plan should encourage tree planting to absorb more CO2 emissions. It is easier to plant trees than to make people walk instead of drive.</p> <p>Green corridors should be identified and protected. If attractive enough, this will facilitate travel by walking and cycling.</p>	<p>The Surrey Nature Partnership is working on a Biodiversity Opportunity Area (BOA) strategy that sets out the appropriate management of sites within and adjacent to BOAs.</p> <p>The Council's SPD will set out guidance for habitat creation and enhancement in areas not covered by BOAs, including settlement areas. This document will set out the types of habitat creation that may be considered appropriate and may provide guidance on tree planting, if this is appropriate.</p> <p>If the evidence suggests this is appropriate, the SPD may set out wildlife corridors to establish ecological networks within settlements.</p>
The River Wey should become a wildlife corridor.	See above.
Limited areas of green infrastructure could be used for housing.	The NPPF requires open space to be protected, except in certain circumstances. It also requires the Council to achieve net gains in biodiversity. The Council will seek to meet both of these requirements.
<p>Need further definition and designation about protecting public rights of way, allotments, public green space etc.</p> <p>Allotments should be designated and protected.</p>	<p>Open space of public value is protected by the NPPF. The Council is currently producing an Open Space, Sports and Recreation Assessment which will set out which spaces receive this protection.</p> <p>Rights of way are dealt with by Surrey County Council.</p>
Ancient woodland must be given absolute protection under this plan.	The NPPF provides protection for ancient woodland: "planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland".
Trees offer excellent opportunities to combat flash flooding.	Policy 14 identifies green infrastructure as a way of managing flooding.
There must be consistency between people per household in Policy R2 and the audit.	The Open Space Sports and Recreation study will develop appropriate open space standards for the borough based on evidence, guidance and practice.
Why is only TBHSPA shown on the map and not other commons/woodlands?	Ancient woodland is now shown on the policies map as well as Sites of Nature Conservation Interest and Sites of Special Scientific Interest.

Issue	Guildford Borough Council Response
No proposals for a new nature reserves.	Snakey Lane had been added to our list of Local Nature Reserves.
Jacobs Well Village Hall- land for allotment.	It is understood to be Worplesdon Parish Council's intention to provide allotments in the future on this site, however, the land does not need to be allocated in the Local Plan for this use, and could be brought forward through a planning application. The land does not need to be inset from the Green Belt to ensure delivery of allotments, and not allocating the land provides flexibility to consider the exact location of any future allotments, or consider further future uses for this land.
Westborough Allotments.	Support for Westborough allotments is noted.
The plan has not been subject to a wildlife impact assessment.	Policy I4 is a strategic policy that will deliver net gains in biodiversity at a landscape scale, and protects designated sites. Under UK legislation, the plan is subject to Sustainability Appraisal and the impacts on European protected species are considered through Habitats Regulations Assessment. Both the SA and the HRA process have been followed. Impacts on local wildlife are usually considered as part of the planning application process.
<p>This policy should include:</p> <ul style="list-style-type: none"> - A strategy of green approach roads and green settlement edges - Ensuring countryside we enjoy is not urbanised and spoilt by car parks due to SANG policies - Provision of access and a green corridor along both banks of the River Wey - Integration of "green and blue" features to provide space for water to manage flood risk. <p>We need a far more joined up approach to flood risk management in Guildford, especially if we want to free up development opportunities and keep pressure on the Green Belt to a minimum</p> <ul style="list-style-type: none"> - Protection of views onto and from green spaces 	<p>The Green Belt provides a strategic approach to ensuring the area around our towns remain open countryside.</p> <p>SANGs are semi-natural spaces and must be maintained as such. It is not agreed that SANGs lead to the urbanisation of the countryside.</p> <p>In terms of access, the Council is currently considering re-development of the town centre which could include new public space along the Wey. This may be taken forward as an Area Action Plan, if appropriate. See above regarding green corridors.</p> <p>Policy I4 now includes a section dealing with the management of flood risk through green and blue infrastructure.</p> <p>Flood risk management is generally covered by the NPPF which prevents certain types of development from being built in areas prone to flood. The Council has recently updated the Strategic Flood Risk Assessment for the borough which shows where NPPF flooding policy should be applied.</p> <p>Policy D1: Making Places Better will require new development to take account its context, this will include views.</p>
<p>The plan needs more insight into Biodiversity Opportunity Areas.</p> <p>Plan sees Guildford in isolation- this is not compliant with the NPPF.</p>	Policy I4 requires development proposals to contribute to the emerging approach for Surrey being produced by the Surrey Nature Partnership. This approach is based around Biodiversity Opportunity Areas (BOAs).

Issue	Guildford Borough Council Response
	This approach considers biodiversity at the landscape scale across local authority boundaries.
Normandy Common will hopefully be an SNCI in the next year.	SNCI designations are continuously reviewed as part of a rolling programme of surveys carried out by the Surrey Wildlife Trust on behalf of the borough Council, and some new SNCI have been designated in this process.
Biological diversity should be given its own bulletpoint which emphasises protection, enhancement and management as well as creation.	Policy 14 includes references to all of these.
Open spaces should be protected.	Open space of public value is protected by the NPPF. The proposals map identifies open space of public value within inset settlements. Outside these areas, open space is protected by Green Belt policy.
Policy 19 should protect GB, AONB and AGLV.	National policy and strategic policies P1 and P2 protect the AONB and the Green Belt. AGLV is protected by strategic policy P1.
Surrey would like to see the policy, or at least the supporting text, set out that limited community and social infrastructure development of open space within the urban area could be acceptable to recognise that there may be a need for schools to expand on site to meet the anticipated growth in pupil numbers.	Policy 14 does not introduce criteria for the protection of open space as this criteria is supplied by the NPPF.
Any further loss of greenspace will have an effect on wellbeing. We have a responsibility to look after these spaces and maintain them.	Comment noted. The supporting text of policy 14 sets out the social benefits of open space and the importance of retaining them.
Green areas should be preserved for nature, fun days and lovely walks.	Policy 14 will deliver net gains in biodiversity across the borough which will increase the opportunities for recreation.
More Barn Owl deaths as their habitats get destroyed and they have to spend more time of the ever crowding roads. Need to protect existing endangered species.	Policy 14 implements an approach to habitat improvement based around identified Biodiversity Opportunity Areas (BOA). The River Blackwater (R03) and River Wey (R04) BOAs are identified as important habitats for Barn Owls. Policy 14 will therefore deliver habitat creation and/or enhancement for an important Barn Owl habitat. Other BOAs are priority habitats for other species.
Building on green spaces will change the feel of Guildford.	Open spaces of public value within Guildford are protected by the NPPF. Policy 14 recognises the importance of open space and identifies it as an asset of strategic importance.
Restrictions imposed by SSSI and SPA have been ignored.	Policy L5 maintains protection for the SPA and continues the approach to mitigation established by the Joint Strategic Partnership Board and overseen by Natural England.
Object to enhancement if it means turning natural land to urban.	Enhancement of natural areas does not refer to urbanisation.
Make sure character of open land is known to protect against harmful development, noise pollution and insensitive management.	Open space of public value within inset settlements is protected from development by the NPPF. Outside these settlements, open space is protected by Green Belt policy.
Popular public footpaths would be lost by development.	Public rights of way are protected by legislation. They can be extinguished by Local Authorities only if it considers that the path is no longer needed.

Issue	Guildford Borough Council Response
<p>Trees and water in public spaces would be welcome, especially with higher density of housing.</p> <p>Parkland such as Stoke Park needs to be preserved and maintained and more accessible from the town.</p> <p>We need more children's playspace - now, not in 10 years time.</p>	<p>These are generally not planning policy matters.</p> <p>These comments have been passed to the team that manages the Council's parks. The Council has pooled contributions from developers</p> <p>We require new developments over a given size to provide children's play equipment.</p>
<p>Support the need for new and enhanced (outdoor) recreation spaces.</p>	<p>Comment noted.</p>
<p>The category of "publicly accessible natural open space" should to be divided into two further strands: that accessible by footpath rights of way, and that which is a "right to roam" area.</p>	<p>The wording of this policy has now changed so the concern here is no longer an issue.</p>
<p>Designate adequate green space in new developments - not lost within the curtilage of properties over time or developed.</p>	<p>The current Local Plan 2003 Policies R2 and R3 set out the amount of open space that needs to be provided as part of housing developments</p>
<p>Keep the existing policy which requires provision of 2.8ha of open space per 1,000 people.</p>	<p>The 'Proposed Submission Local Plan: strategy and sites' largely deals with strategic matters. The provision of open space in new developments will be considered when the Council produces the 'Local Plan: development management policies' document.</p>
<p>Can the Open Space study be released? Has the audit been completed?</p>	<p>The Open Space, Sports and Recreation Assessment is currently being undertaken. It will be published once it is complete.</p>
<p>There is a need for more sports facilities: basketball courts – suggested sites are St Peters School, Stag Hill (good public transport and road network), land at Saltbox Road (delivered with a school), unused industrial buildings.</p> <p>We need more areas for children and teenagers – not just small slides/ parkour areas/skateboard parks.</p> <p>The Council does not have an up to date Playing Pitch Strategy.</p>	<p>The Council is currently undertaking an Open Space, Sports and Recreation Assessment which will identify deficits in sports and recreation facility provision. This will inform both planning policy and the Council's development of sports facilities.</p> <p>The comments on suitable spaces for new facilities have been passed to the Council's Parks and Countryside team.</p>
<p>We should not lose recreational opportunities.</p>	<p>The NPPF protects open space, sport and recreation facilities provision except where there is an identified surplus of land.</p>
<p>Sport England would recommend a reference to cover indoor and outdoor sports facilities.</p>	<p>Policy I4 refers to sports and recreation buildings and land.</p>
<p>The Local Plan has not adequately planned for facilities in accordance with NPPF P73.</p>	<p>The Council is currently producing an updated Open Space, Sports and Recreation Assessment which will identify areas of deficit in the provision of sports facilities.</p>
<p>Loss of Bellfields allotments is highly undesirable and it would cost a lot of public money to prepare it for development.</p>	<p>The allotments at Bellfields are included within the proposed site boundary for the Slyfield Area Redevelopment Project (SARP). Legislation requires us to replace allotments when they are lost. This will be considered during the masterplanning of SARP.</p>

Issue	Guildford Borough Council Response
Wetlands should be included in the strategy for blue infrastructure.	Policy I4 makes reference to the important of wetland habitats for flood risk management.
<p>River Wey/water quality:</p> <ul style="list-style-type: none"> • The policy should seek to enhance the River Wey • Make reference to EU Water Framework Directive Aim to get River Wey to a 'good' status by the EU Water Framework Directive by 2027. • Local Plan needs to run alongside the objectives of Wey Catchment Partnership and support the catchment based approach. 	Policy I4 seeks enhancement of all waterways, including the River Wey and requires development to support the implementation of the Water Framework Directive and the Wey Catchment Plan.
<p>Make sure buildings near River Wey are appropriate Resist proposals that would bring buildings closer to the Wey.</p>	The River Wey is a conservation area so its setting is protected.
<p>The plan needs to safeguard a strip along both sides of the river for a future riverside walk.</p> <p>Access to the River Wey should be enhanced.</p>	<p>There is a towpath alongside the River Wey and Godalming Navigations. It is considered that there is not a case for site allocations to safeguard a strip on the alternate side of the river from the existing towpath.</p> <p>The River Wey towpath around Parsonage Watermeadows (linking the A25 to A320) is to be improved in 2016, in a project funded by the Enterprise M3 Local Enterprise Partnership and Guildford Borough Council, and working with the National Trust.</p>
Keep the Basingstoke Canal better maintained.	The Basingstoke Canal falls within the River Biodiversity Opportunity Area (BOA). Policy I4 requires enhancement measures that support the aims of this BOA and requires development to help deliver the aims of the Water Framework Directive.
Seek funding for the maintenance of the river.	This is not a matter for the Local Plan.
What is blue infrastructure.	The opening paragraph of policy I4 sets out the meaning of blue and green infrastructure.
<p>Roads and car parks should be screened from the river.</p> <p>Buildings have their backs to river which spoils the river setting.</p>	The River Wey is a conservation area. New development should conserve and enhance the conservation area and its setting. Planting screening around existing roads and car parks does not require planning permission so is not generally an issue for planning policy. Draft Policy D1: Making better places, will require new development to take account of its context, further issues relating to design may be addressed through the future 'Local Plan: Development Management policies' document.
<p>The policy makes no mention of the Basingstoke Canal</p> <ul style="list-style-type: none"> • The Council does not meet the annual contribution • The canal would benefit from CIL funding • Buildings should face the canal in Ash Wharf <p>No mention of Basingstoke or Wey and Arun canal.</p>	Policy I4 refers to 'waterways' in order to include all canals, rivers and navigations within the borough. The first two bullet points are not a matter for the Local Plan. The third bullet point relates to design. Draft Policy D1: Making better places, will require new development to take account of its context, further issues relating to design may be addressed through the future 'Local Plan: development management policies' document.

Issue	Guildford Borough Council Response
The object of the Basingstoke Canal Partnership is to manage the canal (which is a Site of Special Scientific Interest and a Conservation Area) as a navigation and as an amenity for a range of users including walkers, cyclists, boat owners, canoeists and fishermen. The Partnership is also responsible for the management of the SSSI which is nationally important. The canal provides a vitally important 'green corridor' in a built up area and it is a much used and much valued local amenity'.	Policy I4 provides protection for SSSI and a mechanism for enhancing the River Biodiversity Opportunity Area which includes the canal. I4 is a strategic policy so does not deal with detailed matters. The Council may set out green corridors through a future SPD and/or development management policies.
SARP and Walnut Tree Close could have big regeneration projects to make the river banks cleaner and more attractive and to provide more housing than a town centre regeneration.	Policy I4 supports enhancement of the river, including the return of banks to a more natural state.
SANG should actually provide new opportunities for recreation and leisure, not re-use existing open space. This is a form of double counting.	Proposals for new SANGs no longer include land that is already open space.
The Council should not deliver SANGs as these unlock development. No need to actually designate areas as SANG and developing them to be SANG will have an effect on local area.	The Council needs to demonstrate that the development proposals in the Local Plan are deliverable, and this includes demonstrating that enough SANG is available in the right places. The Infrastructure Delivery Plan sets this information out. All the proposed new SANGs will have a catchment of four or five hectares do not mean that development is concentrated in the local area.
Is there any evidence that SANGS work and will be sufficient for each location?	The SANG approach has been established by the Joint Strategic Partnership Board and is overseen by Natural England. Under the terms of the approach, SANGs can provide mitigation for the developments that fall within their catchments. The size of the catchment depends on the SANG size. Natural England monitors the approach to ensure that it is effective.
Don't turn natural parks into areas with intrusive hardware and signs, fencing and cleared vegetation.	SANGs must be managed as semi-natural spaces and not formal parkland. Generally, we would expect to see habitat creation and enhancement. Policy I4 expects SANGs to contribute to the aims of the Biodiversity Opportunity Area they fall within or adjacent to, which will mean delivering net gains in biodiversity.
Need policy on implementation and expansion of SANGS.	Policy p5 requires the provision of SANG when residential development falls within 5km of the SPA. Detailed matters regarding SANGs are set out in the Thames Basin Heaths Special Protection Area Avoidance Strategy.
SANGs have not been explained adequately. No description as to how and when SANGS will be implemented.	This information has been set out in the Infrastructure Delivery Plan and the Infrastructure Delivery Schedule. The delivery and management proposals for new SANGs will be set out in the Thames Basin Heaths Special Protection Area Avoidance Strategy.
Consider Chilworth Gunpowder Mills site and the field as SANG.	The Council is considering this proposal.
If a car park is provided at Effingham, it will just be used by commuters.	A parking area could be provided with a wait limit if it is considered that commuters might use it.
The quality of GI has to be considered as well as quantity. The proposed monitoring	The monitoring indicators for Policy I4 include quality indicators for designated sites

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is too simplistic.	and waterways.
There is no consultation on the delivery mechanisms for green infrastructure.	Policy I4 sets out how green infrastructure enhancement and creation is expected to be delivered; through management of the Council's own estate and delivered by developers. This policy is being consulted upon.
The promotion of Green and Blue Infrastructure should not be an obstacle to meeting housing needs.	The NPPF requires the Local Plan to protect open space and deliver net gains in biodiversity.
Enhancing the River Wey could counter the use of Brownfield land for housing.	<p>The Water Framework Directive requires the council to work to achieving 'good' status for the river.</p> <p>The NPPF requires the Local Plan to plan for biodiversity at the landscape scale across local authority boundaries. The River Wey is an Biodiversity Opportunity Area within the Surrey strategic approach to biodiversity areas. Therefore, to satisfy the NPPF we must seek to enhance the River Wey.</p>
Buildings (habitable or office space) should be at a prescribed level above 1968 flood levels.	Flood risk is taken into account where appropriate in the site allocations policies, informed by the Level 1 and 2 Strategic Flood Risk Assessments, and the flood risk sequential test. Flood mitigation is required by the proposed site allocations policies, where appropriate.
<p>Policy 19 does not fit with other policies in the plan. The plan is growth led and will lead to biodiversity loss and a lack of climate change adaptation.</p> <p>Proposed development will destroy existing habitats.</p> <p>More development will lead to more pollution with a negative effect on biodiversity.</p> <p>Loss of diversity of species if development goes ahead</p>	The Local Plan is required to balance a number of competing priorities, and to deliver a plan that is sustainable across the economic, social and environmental dimensions. Policy I4 addresses the requirements of the NPPF and legislation relating to the natural environment and open space and seeks to ensure that development is done in a way that delivers the net gains in biodiversity required by the NPPF. The plan must do this while it achieves growth, which is also required by the NPPF.
Building at Liddington Hall would cut off a green corridor	No longer applicable as this site is no longer included as a site allocation in the 'Proposed Submission Local Plan: strategy and sites'.
Walks and cycle routes will be broken up by development	Policy I3 of the 'Proposed Submission Local Plan: strategy and sites' states that "We will expect new development to: ... protect, enhance and improve existing cycle and walking routes, to ensure the effectiveness and amenity of these routes ..."
<p>Flooding:</p> <ul style="list-style-type: none"> • There has not been a sequential flood test • Building will only add to flooding issues. 	Policy P4 of the 'Proposed Submission Local Plan: strategy and sites' identifies the approach the Council will take to mitigating flood risk. A sequential flood risk test and Level 1 and Level 2 Strategic Flood Risk Assessments have been undertaken to ensure that development is first directed to the areas of lowest flood risk. These documents form a key part of the Council's evidence base and have informed the site allocations included in the 'Proposed Submission Local Plan: strategy and sites'.
Should include SSSI and ancient woodland on key diagram.	These are included on the policies map.
High density housing around the River could be really attractive.	Flood risk is a significant constraint on development in the borough. Proposals in

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	areas at risk of flooding will only be approved where they pass the sequential and exceptions tests and provide sufficient mitigation measures to ensure that they are safe for their lifetime. Policy P4 of the 'Proposed Submission Local Plan: strategy and sites' outlines the approach the Council will adopt to development proposals in areas at medium or high risk of flooding.
Urban sprawl: <ul style="list-style-type: none"> • Allowing urban sprawl would destroy greenspaces • Allowing urban sprawl would ruin the character and reduce biodiversity • Stop the incursion of urban features into the countryside • Building around the edge of villages will eventually join up the area. 	The plan does not allow urban sprawl as it maintains Green Belt protection around settlements. Open spaces of public value within settlement areas are protected by the NPPF. Outside inset settlements, land is protected by the Green Belt. Policy I4 requires the delivery of net gains for biodiversity.
Plans would have an adverse affect on the wildlife	Policy I4 requires the delivery of net gains for biodiversity and supports the improvement of priority habitats.
Need direct access between the station, the University and the town centre	<p>If the requirements and opportunities for site allocations A15, A11, A8 and A7 as set out in the 'Proposed Submission Local Plan: strategy and sites' are realised, there will be a pedestrian route between the Land at Guildford cathedral site to Guildford railway station via the University of Surrey's Stag Hill campus, the Guildford Park Car Park site and the Land west of Guildford railway station site.</p> <p>The replacement Walnut Bridge scheme, included as an element of scheme LRN1 Guildford Town Centre Transport Package in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites', will provide a wider structure to cater for higher flows of pedestrians plus usage by cyclists, for those using the route between Guildford railway station and Onslow Street.</p>
How does policy 19 (Green and Blue Infrastructure) link to other policies e.g. policies 8 (AONB) and 10 (Green Belt)?	Positive opportunities to improve biodiversity are encouraged and supported in the NPPF in Green Belt and AONB areas.
Farnham Road should be included for housing in the SHLAA as should all urban sites in Walnut Tree Close.	Site allocations need to have full regard to national flood risk policy. Areas or Walnut Tree Close are at high risk of flooding. The NPPF notes that "Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding." The 'Proposed Submission Local Plan: strategy and sites' considers that there are reasonably available alternative sites for new homes at less risk of flooding.
Turn Burpham Court Farm into a haven for narrow boats - 3 bedroom boat for £100,000 would solve affordable housing problem.	The need for affordable homes is in excess of what could be provided on one site/area.
Impact on food production: <ul style="list-style-type: none"> • Building on agricultural land reduces the UK ability to feed itself and potentially rationing as food becomes scarce • Loss of farmland for food production – needs protection. 	This has been considered as part of the Sustainability Appraisal process.

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The roads would become more dangerous with the increased traffic, the countryside people come to see would be no more (or substantially changed) and tourist benefits of seeing how beautiful Surrey is would be dramatically reduced.	The Local Plan needs to balance meeting development needs in a sustainable way whilst protecting what is important. Competing environmental, social and economic considerations have been assessed as part of the Sustainability Appraisal process.
The one meaningful contribution that the Plan could have in this field is the Walnut Tree Close/Woodbridge Meadows development favoured by both Allies & Morrison and the Guildford Vision Group- why does the Plan not make mention of it?	Potential development sites are considered in the Land Availability Assessment (LAA) against the criteria in the NPPG. The LAA identifies sites that are realistic candidates for development and those that are discounted. Some sites are identified as realistic candidates for development in Walnut Tree Close, however, some are also discounted, primarily due to high flood risk. The land identified as realistic candidates for development must be deliverable or developable within the plan period. This is not considered to be the case presently for some of the development proposals identified in the Town Centre Masterplan. However, the Council is considering preparing a Town Centre Area Action Plan, following the Local Plan, which could consider these issues, if there is further evidence to suggest this land meets NPPG criteria.
<p>Conservation Areas:</p> <ul style="list-style-type: none"> • It would not be possible to sustain Conservation Area status in Send if proposals were implemented • Conservation areas aren't all obvious- could be development sites. Revise whether they need this status. 	Draft Policy D3: Historic Environment requires new development to conserve and enhance the historic environment in a manner appropriate to its significance.
Plan refers to a Flood Risk Study which is out of date.	The Guildford Strategic Flood Risk Assessment has been updated for 2016. This study is available in the evidence base for the Local Plan.
How will GB and AONB be protected.	The 'Proposed Submission Local Plan: strategy and sites' includes a policy protecting Green Belt and a policy protecting the AONB.
<p>Developing around Send Marsh would affect lots of wildlife and fauna.</p> <p>Ockham is of environmental and wildlife importance, do not want to lose this to housing.</p>	Policy I4 requires development to deliver biodiversity enhancement. Impacts on local wildlife are considered at the planning application stage.
No overall policy for the rural and urban environment design	There are a number of draft design policies in the 'Proposed Submission Local Plan: strategy and sites', D1: Making better places, D2: Sustainable design, construction and energy, D3: Historic environment and D4: Development in urban areas and inset villages.
An urban farm should be created at Blackwell Farm	The owner of the site has not put the land forward for this purpose.
Nothing that affects the ability of AONB, Conservation Area or Green Belt to fulfil their function, should be permitted to take place without very special circumstances and these should be clearly laid out.	We consider there are exceptional circumstances to justify amending Green Belt boundaries. The spatial strategy in the 'Proposed Submission Local Plan: strategy and sites' has strengthened the use of AONB as a constraint. Any planning applications in Conservation Areas will need to demonstrate that it would preserve the character.
<p>We must:</p> <ul style="list-style-type: none"> · Preserve our attractive, accessible countryside, gardens, allotments and natural 	The NPPF protects open space of public value. Policy I4 will deliver biodiversity enhancements.

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<p>open spaces.</p> <ul style="list-style-type: none"> · Retain the green character of the edges of Guildford, and of its approach roads. · Make the green corridor along the river much more of a feature and protect views throughout the borough. · Ensure new developments contribute to creating distinctive places and a sense of community, not “could be anywhere” estates, and provide well designed spaces for vehicles to reduce the dominance of parked cars on streets. 	<p>The supporting text to draft Policy D1: Making better places, includes a sentence that discusses this point.</p> <p>In terms of access, the Council is currently considering re-development of the town centre which could include new public space along the Wey. This may be taken forward as an Area Action Plan, if appropriate.</p> <p>Policy D1: Making better places addresses this point and sets out the Council’s requirements for new developments.</p>
<p>Cemeteries:</p> <ul style="list-style-type: none"> • Not clear enough provisions for cemeteries • There are enough cemeteries in Godalming and Worplesdon. 	<p>The new Local Plan includes one site proposed to be allocated for a new burial ground</p>
<p>There are concerns over current society depending on natural environment and sustainability.</p>	<p>The NPPF requires us to achieve sustainable development, which it defines as sustainable growth. Policy I4 will require development to be delivered in a way that leads to biodiversity improvements and enhancement. Policy D2 requires developments to deliver sustainable design, construction and energy. The plan as a whole seeks to deliver sustainable development across the economic, social and environmental dimensions.</p>
<p>The Sustainability Appraisal has not clearly demonstrated that there are not alternative sites less harmful to the environment to allocate for development. Also not proved that lower quality agricultural land has been allocated first</p>	<p>The Sustainability Appraisal has considered all reasonable alternatives – both in terms of spatial strategy and site options. The Sustainability Appraisal that accompanies the ‘Proposed Submission Local Plan: strategy and sites’ has incorporated additional information related to agricultural land quality. However this must be balanced alongside other factors.</p>
<p>Blackwell Farm has potential to create a network of green spaces, providing opportunities for play, leisure and relaxation. It can also provide blue infrastructure.</p> <p>There should be additional land at Blackwell Farm to bring green infrastructure benefits.</p>	<p>Policy I4 requires development to deliver biodiversity enhancements in line with the emerging strategy for Surrey. Existing open space of public value will be protected by the NPPF.</p>
<p>SPA policies need to be re-examined- protection of 3 birds may be detrimental to other endangered birds</p>	<p>Policy P5 protects the SPA. It draws on the approach created by the Thames Basin Heaths Joint Strategic Partnership Board and set out in the Thames Basin Heaths Special Protection Area Delivery Framework.</p> <p>Protection of the three specified bird species is codified into European and UK law. The Local Plan must comply with this legislation.</p>
<p>The proposals for a new football ground are supported.</p>	<p>The site proposed in the last version of the draft new Local Plan is not available for development</p>
<p>The document is unclear. The chapter headings should be changed to reflect the structure used in previous documents, like the Surrey Structure Plan.</p>	<p>The proposed submission version of the plan has a new layout with policies collected into topic areas. The Council thinks this makes the plan much clearer.</p>
<p>The plan should place more value on the protection of soils.</p>	<p>This has been considered as part of the Sustainability Appraisal process. However</p>

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	this must be balanced alongside other factors.
Increasing the number of households will have a detrimental effect on the surrounding countryside.	The NPPF requires us to “significantly boost the supply of housing” while achieving sustainable development, which includes environmental sustainability. The purpose of Policy I4 is to ensure that increasing the number of homes in the borough will be done in a way that leads to enhancement of the natural parts of the borough.
GI would be a legitimate use of CIL.	It is likely that once the CIL is introduced in Guildford, a proportion of the CIL receipts raised within the borough will be spent on green infrastructure / open space
By building on more countryside, the remaining land will be overused and impact on wildlife habitats. Roads will become used by wildlife and this is dangerous for both parties	This has been considered as part of the Sustainability Appraisal process. However this must be balanced alongside other factors.
<p><i>Walnut Tree Close and Wey corridor:</i></p> <ul style="list-style-type: none"> • Redevelop Walnut Tree Close to make the river banks more attractive and to take some of the housing number • The river Wey should have a waterfront like Kingston. • Building along both banks of the Wey in the town centre would result in less traffic and taking some of housing number. Relocate industrial building on Walnut Tree Close which will further reduce traffic. • Residential regeneration of Walnut Tree Close should incorporate most of housing number in order to avoid development on the Green Belt. • Development at Walnut Tree Close would not spoil the character of the watercourses any more than the existing bus garage or car parks • The Wey corridor should be cleared as the housing/ car parks are inappropriate and replaced with imaginative low rise housing and leisure facilities. 	Site allocations need to have full regard to national flood risk policy. Some areas or Walnut Tree Close are at high risk of flooding. The NPPF notes that “Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding.” The ‘Proposed Submission Local Plan: strategy and sites’ considers that there are reasonably available alternative sites for new homes at less risk of flooding. However, some sites are at medium or low risk of flooding at Walnut Tree Close and surrounding area, and are proposed for allocation in the ‘Proposed Submission Local Plan: strategy and sites’. These site allocation policies reference the river corridor, the character of the River Wey, and the need to make better use of the river and its enjoyment, where appropriate.
Resist development that would increase risk of flooding from the Wey.	<p>Policy P4 of the ‘Proposed Submission Local Plan: strategy and sites’ identifies the approach the Council will take to mitigating flood risk. A sequential flood risk test and Level 1 and Level 2 Strategic Flood Risk Assessments have been undertaken to ensure that development is first directed to the areas of lowest flood risk. Development in areas of medium and high flood risk will only be approved where the proposal passes the sequential test and Exceptions Test (if necessary) and various other criteria are met.</p> <p>The documents identified above form a key part of the Council’s evidence base and have informed the site allocations included in the Local Plan. Detailed flood risk modelling has been, and will continue to be, undertaken on the River Wey. Such work has helped identified the extent of the floodplain around the River Wey and the appropriateness of site allocations included within the plan.</p>
Ground floors near the river should be for parking to allow flood water to be stored	Policy P4 of the ‘Proposed Submission Local Plan: strategy and sites’ identifies the approach the Council will take to mitigating flood risk. The policy is based on the Council’s evidence base and guidance provided by the NPPF and NPPG. The

Issue	Guildford Borough Council Response
	compatibility of particular land uses to each flood zone is identified in NPPG and will be a key consideration in the determination of planning applications in the borough. Policy P4 of the 'Proposed Submission Local Plan: strategy and sites' makes clear that the vulnerability of the proposed use is appropriate for the level of flood risk on the site.
<p>Local Green Space should be designated through this local plan in Send at the GBC- owned nature reserve and at the Millenium Green Space, Heathfield and Bush Lane Woods, within Send's proposed inset which are ideal for this designation, and the plan period is the perfect time to identify such areas (NPPF 75).</p> <p>Para 4.227 - Object as no reference to Local Green Space designated land</p>	<p>Policy I4 is a strategic policy and deals with open space at the strategic scale. It does not designate Local Green Space as these are locally significant spaces and including a Local Green Space in a strategic policy would limit the freedom of neighbourhood plans to develop policies of their own (neighbourhood plans must be in general conformity with the strategic policies of the Local Plan). Send Parish Council is currently producing a neighbourhood plan which may consider designating these spaces as Local Green Spaces.</p> <p>Open space of public value is protected by Policy I4 and the NPPF. The Council is producing an Open Space Sports and Recreation Assessment which may identify these spaces as open space that would then be protected.</p>
<p>CPRE object to the fact that there is a major omission covering a policy on biodiversity and also the way in which SANGs are not explained more adequately. There is no description as to when, how and why they are implemented.</p> <p>There is also insufficient policy coverage for the rural and urban environment in terms of overall design and amenity. For example, there is no statement on urban parks, the use of trees in towns, green corridors, heathland, and the role of woodland.</p>	<p>SANGs are now explained in the Infrastructure Delivery Plan and in policy P5 Thames Basin Heath Special Protection Areas.</p> <p>Policy I4 deals with biodiversity at the landscape (strategic) scale . It will be followed by development management policies and an SPD that go into more detail.</p>
<p>Policy 19: G11 was for the Wey and Navigations and nothing else. Although para 4.231 is headed Wey Navigation there is no mention within the Policy itself. Policy 19 just talks about 'blue infrastructure'. The Guildford Society considers that the Wey and Navigations should have specific mention within a policy. R1 is not expressly covered.</p>	<p>Policy 19 has been significantly reworked as policy I4 and includes support for protection and improvements to the Wey and Navigations.</p>
<p>There is nothing in the plan or evidence base that sets out the importance of play space. The final version of the local plan should include policies in relation to play spaces using 'Planning and Design for Outdoor Space and Play' published by the Fields in Trust in 2008.</p>	<p>The Council is currently updating the Open Space Sports and Recreation Study which looks at recreation provision and identifies deficits. This includes play space. The majority of play spaces are provided by the Council's Parks and Countryside team who are currently producing an updated Play Strategy.</p>
<p>Partridge field opposite Beechcroft Drive is Onslow's immediate access to the greenbelt as such is consistently utilised by ramblers, dog walkers, joggers, people engaging in Equestrian pursuits, children's groups, triathlons this should therefore be categorised as a designated green space.</p> <ul style="list-style-type: none"> The plan lacks a section on urban green space and recreation/amenity 	<p>Open space of public value is protected by Policy I4 and the NPPF. The Council is producing an Open Space Sports and Recreation Assessment which may identify this space as open space.</p>

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<p>One further point on Policy 19 is that the whole draft Plan pays too little attention to land for sport and recreation (especially for young people). This needs to be part of the planning obligations and needs to be taken into account in viability assessments.</p> <p>The open area south of King's Road in Shalford should be designated Local Green Space (behind the bowls club)</p>	

Draft

Responses to comments on site allocations and appendices of the Draft Local Plan: strategy and sites (2014) and issues raised by questionnaire

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Draft

1. Site Allocations

Planning for sites – general

Issue	Guildford Borough Council Response
Object to draft Local Plan.	Comment noted.
Plan generally sensible.	Comment noted.
Plan is misleading.	This has been responded to in the table for Question 7 of the questionnaire.
No requirement for scale of growth proposed.	Evidence base documents (including the Strategic Housing Market Assessment, the Employment Land Needs Assessment and Retail and Leisure Study) identify the need for development over the plan period.
No evidence to support plan.	The plan is supported by evidence base – see www.guildford.gov.uk/evidencebase for more information.
Plan only benefits developers.	The 'Proposed Submission Local Plan: strategy and sites' provides new development to meet identified needs.
Cannot justify Green Belt release, when chose to provide supermarket in town rather than new affordable homes (Waitrose).	The 'Proposed Submission Local Plan: strategy and sites' needs to balance competing demands, and positively seek opportunities to meet the development needs of the area. This includes the need for retail and employment floorspace, along with housing.
Support proposal for school at Salt Box Road.	Comment noted.
Tyting Farm not appropriate for SANG.	The Council does not agree with this comment. The Council undertook a study of potential Suitable Alternative Natural Green Space (SANG) sites in 2006 and found Tyting Farm to be the most suitable site of all the sites surveyed. This study can be seen as an appendix in the 2006 Interim Thames Basin Heaths Special Protection Area Avoidance Strategy.
Missing evidence base.	The plan is supported by the Council's evidence base – see www.guildford.gov.uk/evidencebase for more information.
No plan for A3.	<p>The Government's Road Investment Strategy (March 2015) mandates Highways England to improve the existing A3 Guildford from the A320 Stoke Interchange to the A31 Hog's Back junction with the A31, with associated safety improvements. In announcing the Road Investment Strategy in December 2014, the Government described the improvement as involving the widening of the carriageways. The A3 Guildford scheme is now being planned by Highways England. Highways England is also investigating an alternative option of an A3 Guildford tunnel, with the existing road detrunked and retained for local traffic movements.</p> <p>The 'Proposed Submission Local Plan: strategy and sites' includes Policy I2 Supporting the Department for Transport's "Road Investment Strategy" and, in the Infrastructure Schedule at Appendix C, the schemes that are considered necessary for the delivery of the draft Local Plan including several schemes for the improvement of the A3 trunk road, including the A3 Guildford scheme.</p>

Issue	Guildford Borough Council Response
Allocated for too many uses in town, giving option to developer. Should be allocated for one use	The 'Proposed Submission Local Plan: strategy and sites' has rectified this.
Oppose Gosden Hill	Comment noted.
Oppose school in West Clandon	Comment noted.
Oppose Wisley airfield	Comment noted.
Oppose development proposals in Send	Comment noted.
Number of new homes too high	The Strategic Housing Market Assessment (SHMA) identifies a need for 693 homes. The NPPF says that local planning authorities should positively seek opportunities to meet the development needs of their area.
Number of new homes proposed disproportionate to local areas	Our spatial strategy is based on sustainability considerations and not necessarily even distribution across the borough.
Unsubstantiated statement to assume silent majority in support	Comment noted.
Proposals not sustainable development	Our spatial strategy is based on sustainability considerations. See Sustainability Appraisal for more information.
Evidence flawed	We are confident that our evidence base is robust.
Plan has ignored many important issues	The 'Proposed Submission Local Plan: strategy and sites' needs to balance competing demands, and positively seek opportunities to meet the development needs of their area. We are confident that the plan is informed by robust evidence base.
Use brownfield	Our spatial hierarchy prioritises brownfield land. There is not, however, sufficient brownfield land to meet identified needs over the plan period.
Concern about settlement hierarchy and scoring of Send	We are confident that our evidence base is robust. See the table for appendix C – evidence base.
Concern re GBCS and change in scoring for Send	We are confident that our evidence base is robust. See the table for appendix C – evidence base.
Harm/loss of Green Belt	The NPPF attaches great importance to the protection of the Green Belt and boundaries should only be altered in exceptional circumstances through the plan-making process. We consider there are exceptional circumstances. However, we have only proposed to remove land from the Green Belt that would not harm the main purposes of the Green Belt.
No exceptional circumstances identified	We consider that exceptional circumstances exist across the borough. These are the requirement to allocate sufficient land for market and affordable housing and employment development, combined with the significant adverse consequences of not doing so.
<p>Infrastructure concerns:</p> <ul style="list-style-type: none"> • Infrastructure cannot cope with amount of growth proposed / infrastructure not given adequate consideration in the draft LP • Impact on medical facilities • Impact on air pollution • Impact on noise pollution 	The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure to support the planned development which is expected to place extra pressure on existing infrastructure, or to need new or improved infrastructure. The IDP will be updated as further detail on supporting infrastructure is available. Developer contributions and other funding sources will be used to ensure that key infrastructure is delivered when it is needed, including at the

Issue	Guildford Borough Council Response
	planning application stage.
Impact of additional traffic / congestion / narrow road / road safety / A3	<p>The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. The schemes that are considered necessary for the delivery of the Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'. Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Transport Strategy and IDP may therefore be updated to include these.</p> <p>As planning applications are considered for the sites identified in the new Local Plan, additional transport schemes to address site access and other localised issues may be secured.</p>
Flood risk/drainage	Flood risk is a consideration for the Local Plan and development sites are subject to the flood risk sequential test, and level 2 SFRA where appropriate.
Impact on character of area / setting of town / village	Any proposals will need to demonstrate at planning application stage that they are of high quality design and in keeping with the character of the surrounding area. In response to this concern the 'Proposed Submission Local Plan: strategy and sites' includes a new policy on development in urban areas and inset villages.
Concern about traffic associated with new rail stations	The impact of traffic associated with the new Guildford West (Park Barn) or Guildford East (Merrow) rail station will be assessed as part of a Transport Assessment for any planning application to provide the rail stations. The amount of car parking and drop-off facilities for cars will form part of this assessment. If improvements are required to the adjacent highway network then this will need to be provided as part of any planning consent.
Reference to the provision of 'new local centres' in the proposed Site Allocations document should specifically confirm that any retail floorspace provided will be strictly limited to only that which would serve the day to day needs of the immediate local catchment i.e. a maximum of 280sqm (gross).	The Retail and Leisure Study Update 2014 (published Oct 2015) quantifies the amount of floorspace that the strategic sites can support, assuming that 50% of their convenience spend is spent at existing stores off the site (for example in coming home from work). The quantum has been set for allocation and are limited to providing for these local needs only.
Labelling and content are unclear on tables 1 and 2: The correspondence between 'Headings' and 'Settlements' is better than that between 'Locations' and 'Settlements', although the ordering is different. A single system of naming instead of the present three systems would make the Plan much more intelligible and transparent.	Proposed Submission Local Plan has attempted to make labelling and content clearer. Sites have individual policy numbers, and within the site allocation, the Land Availability Assessment (LAA) site reference number is listed.
Sites have not been selected based on how much they would reduce commuting e.g. school sites should be reused as they are accessible without the car Site selection process has been done backwards. It has found GB sites for release	The NPPF advises that there are three dimensions to sustainable development: economic, social and environmental. The Local Plan needs to balance these dimensions when attempting to plan to meet development needs. The spatial options considered when preparing a plan are assessed in the Sustainability

Issue	Guildford Borough Council Response
<p>and chosen the most sustainable among them. It should have found the most sustainable sites and then tested them against the GBCS.</p> <p>It should be made clearer in the DLP as identification of the development sites has made been via a thorough assessment process based on the need to find a logical and pragmatic solution to the Borough's immediate, medium and longer term needs.</p>	<p>Appraisal. Whilst travel distances are a consideration, so are other aspects of sustainability. The identification of possible sites for development in terms of the preparation of the Green Belt and Countryside Study is part of the consideration of the environmental dimensions of sustainable development. The study identified a range of different site options to enable choices to be made based on wider sustainability considerations. The topics papers published alongside the Local Plan consultation document (June 2016) will explain in more detail, as will the Sustainability Appraisal.</p>

Guildford Town Centre Site 20 - North Street

Issue	Guildford Borough Council Response
<p>Refurbish / provide new bus station in its current location with additional facilities such as public conveniences.</p> <p>Bus drivers need to have ready access to rest and toilet facilities between journeys.</p> <p>Fragmenting bus terminal points onto the streets around the North Street area will make the bus services less attractive to passengers, and usage may diminish.</p> <p>It may be difficult to identify sufficient suitable road space with adequate footpath width to replace the 22 bus bays on nearby streets.</p>	<p>Comments noted.</p> <p>The site allocation in the 'Proposed Submission Local Plan: strategy and sites' requires that "Bus interchange facilities presently provided at Guildford bus station on the site are to be provided in a suitable alternative arrangement to be located either partly or wholly on or off site" and that "If alternative arrangement involves on-street provision of bus stops and waiting facilities within the town centre, consideration is required of interactions with other uses such as North Street market, vehicular access and parking, movement and crossings for pedestrians, and the quality, character and setting of the town centre environment".</p> <p>New Guildford town centre bus facilities is scheme BT2 in Appendix C Infrastructure Schedule.</p>
<p>There must be a large element of housing on this site; previously developed land, low probability of flooding, would make area more lively and would "police" it.</p>	<p>The draft site allocation now includes a considerable number of new homes</p>
<p>Land Securities, the Council's development partner for this site supports the draft site allocation for retail, leisure, restaurants and cafes and non-residential institutions, but recommends that residential use (Class C3) is also included for viability reasons.</p>	<p>The site has subsequently been sold and Guildford Borough Council (GBC) is working with the new landowner of part of the site, and agreement has been reached to include a significant residential component.</p>

A retail-led scheme in this location could potentially have a damaging effect on the town centre's existing retail.	The development site will undoubtedly be an impact on the existing retail streets. A retail impact assessment will be required to demonstrate that impacts would not be significantly adverse.
24 hour public access to streets needed.	This is a key consideration of the allocation
Support coach drop-off/pick-up spaces close to town centre for tourist coaches visiting the town; at least two are needed. A coach parking area outside of the town centre, but not too remote from it, needs to be identified but is not.	There are coach drop off and parking areas in the town centre (at Bedford Road), Millbrook, close to the Yvonne Arnaud Theatre, or at the top of the High Street, outside G Live.
No significant additional parking should be provided within the North Street development; there is already considerable congestion within the town centre roads.	There will need to be some parking on site for the residential units. The allocation does not include additional parking space for new retail floorspace, instead encouraging shoppers to park in existing public car parks or to use alternatives to driving into the town centre, such as Park and Ride.
Wasteful to demolish the multi-storey car park unless the BT site becomes available; when the two should be comprehensively developed; a plan should be prepared now.	Leapale Road multi-storey car park is to be retained and is no longer included in the site.
Should discourage private car usage and encourage public transport and cycling. Apart from disabled people, no-one need bring a car into Guildford town centre.	Additional car parking will not be provided for new retail development and for only approximately half the proposed flats to help minimise the number of cars being driven into the retail heart of the town centre. Bays will be required to be provided specifically for registered disabled people to park, and car clubs.
Buildings should be constructed to highest environmental sustainability standards.	The 'Proposed Submission Local Plan: strategy and sites' includes Policy D2 which requires buildings to be constructed to high sustainability standards.
Site design – storage space for each flat, office, shop, etc to store bins, etc.	Detailed design issues such as these will be relevant for considering at the building design stage, later in the process.
The implications of mixing 'entertainment' units with residential areas, such as noise disturbance, should be borne in mind.	Mixing uses within the same building or in adjacent buildings is a good way of ensuring liveliness and a 24 hour presence. Other than food and drink, no "entertainment" uses are proposed. Design, and controlling hours of operation and licensing will ensure impact on residential amenities are acceptable.
Thames Water has concerns regarding water supply capability (potential need for upgrade to assets) and wastewater services (Drainage Strategy required).	These requirements are included in the site allocation policy.
Limit to 5 storeys.	Many nearby buildings are between 3-6 storeys in height. Storey heights have been taken into account in considering potential quantum of floorspace.
Development of the site needs to be integrated into surrounding area with great	The site is opposite a Conservation Area and contains a listed building. We will

attention to public realm.	therefore ensure at the planning application stage that full consideration is given to design and integration into public realm.
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Site 21 - Portsmouth Road surface car park

Issue	Guildford Borough Council Guildford Borough Council Response
Object	No longer applicable as this site is not included as a site allocation in the 'Proposed Submission Local Plan: strategy and sites'.
Will effect local and historic pubs	
Water supply is not sufficient for this site and would need significant improvement before it could go ahead	
Flood risk, development will reduce floodplain capacity and effect the flow of surface water and thus increase impacts elsewhere.	
Support. Regenerate river	
Could also be used to build houses	
Any development should contribute to the objective of an attractive pedestrian path and green corridor along both sides of the river.	
Should be part of town master plan.	

22 - 1 and 2 Station View, Guildford

Issue	Guildford Borough Council Response
Support affordable flats by the station	No longer applicable as this site is not included as a site allocation in the 'Proposed Submission Local Plan: strategy and sites'. The site has planning permission and is currently being developed.
Housing would be too close to the TBH SPA	
Site should be taken forward as part of a coordinated plan for the river corridor	
Need to establish where land should be allocated for a new road bridge	
Make station aesthetically pleasing to attract more visitors/tourists	
Current water supply network unable to support development	
Wastewater network will be unable to support development	
Drainage infrastructure will be unable to support development	
Grampian style planning condition should be put in place – make sure infrastructure is in place ahead of development	

23 – The Plaza, Portsmouth Road, Guildford

Issue	Guildford Borough Council Response
Agree that site should be used for low cost multi storey housing.	The 'Proposed Submission Local Plan: strategy and sites' allocates this site for approximately 70 homes, of which policy requires 40% to be affordable housing.
Sewage, water and drainage will not cope so needs to be upgraded before construction	Thames Water will work the planned development into their investment programme only once a site has planning permission. Any planning application for development of the site would therefore need to be conditional on upgrades to the water supply

	system being implemented, with the developer paying a contribution where needed.
Object - too many homes for this site. Changing of planning permission from office to residential will result in a much larger building to what was there before and is currently permitted. Good site for slightly less homes. Too large of a building will affect the skyline and character of the area. Close to listed buildings	The planning permission for offices has expired. The 'Proposed Submission Local Plan: strategy and sites' site allocation policy for this site requires development proposals to be sensitive to the scale and heights of nearby Listed Buildings, and views of the church tower (St Nicolas Church, Bury Street, Guildford).
Object to use as housing (although other redevelopment is fine). Within 5km of the Thames Basin Heaths SPA,	The planning permission for offices on this site has now expired, and it is not expected that the new owner of the site would deliver an office development. Housing or retirement flats (C3) are the most likely use to come forward on the site. The proposed dwellings require the provision of Suitable Alternative Natural Greenspace (SANG). The 'Proposed Submission Local Plan: strategy and sites' proposes suitable SANG that will provide mitigation for this site (see Infrastructure Delivery Plan).
Needs urgent redevelopment	Comment noted.
Support office use	Comment noted.
Residential use will put too much pressure on local services and parking	The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure to support the planned development which is expected to place extra pressure on existing infrastructure, or to need new or improved infrastructure. The IDP will be updated as further detail on supporting infrastructure is available. Developer contributions and other funding sources will be used to ensure that key infrastructure is delivered when it is needed, including at the planning application stage.

24 Land at buildings at Guildford Railway Station

Issue	Guildford Borough Council Response
Housing number/density: <ul style="list-style-type: none"> Object to proposed developments – density too high No need for more housing on site 24 	The 'Proposed Submission Local Plan: strategy and sites' allocates the site for approximately 350 homes and other uses. This is less homes than the current planning application (ref: 14/P/02168). However, the suitable use and capacity of a site is determined through consideration of a planning application.
Support proposed site allocation	Comment noted.
Support proposed Hotel	Comment noted, however the 'Proposed Submission Local Plan: strategy and sites' does not allocate the land for a hotel use.
There will be no green spaces for families in the vicinity	The 'Proposed Submission Local Plan: strategy and sites' site allocation policy for this site identifies an opportunity to improve green infrastructure provision on site to

	help improve the character of the area, given the extent of previously developed land. This site is previously developed land.
Developments are motivated by profit	Not a planning consideration. Developments are required to make appropriate financial contributions, and comply with relevant planning policies and material planning considerations.
Development of a taxi rank will take parked cars off the road	The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Transport Strategy and IDP may therefore be updated to include these. As planning applications are considered for the sites identified in the new Local Plan, additional transport schemes to address site access and other localised issues may be secured.
Impact on current road infrastructure	
Impact on traffic congestion	
Car parking provision required on both sides of the railway station and surface car parking should be resisted.	
Impact on rail and bus overcrowding	
Sewage/water drainage: <ul style="list-style-type: none"> • Sewage services will be unable to cope with extra demand • Water supply/drainage infrastructure is unlikely to cope with extra demand 	Thames Water will work the planned housing into their investment programme only once a site has planning permission. Any planning application for development of the site would therefore need to be conditional on upgrades to the water supply system being implemented, with the developer paying a contribution where needed.
Transport infrastructure: <ul style="list-style-type: none"> • Development should allow sufficient bus stops for bus routes to terminate and layover • Additional road into town centre must be safeguarded to provide alternative to Farnham Road bridge • Road network must be defined before any development at the railway station • The Network Rail team (Solum) proposal pays no heed to provision of the Sustainable Movement Corridor 	The 'Proposed Submission Local Plan: strategy and sites' site allocation policy for this site requires that the site layout focuses on ensuring that pedestrians and cyclists are directed towards use of Walnut Bridge (which is to be replaced) when travelling to the town centre, and that the site layout is compatible with the proposals for the Sustainable Movement Corridor or, subject to timing, not compromise the future provision of the Sustainable Movement Corridor, including maintaining access along Station View access road to the Safeguarded land for Sustainable Movement Corridor Town Centre Phase 2 site
Regeneration: <ul style="list-style-type: none"> • The station area needs proper holistic integration • Support the principle of Allies and Morrison vision of station plaza 	Guildford Borough Council is currently progressing a non-statutory town centre regeneration / delivery plan to co-ordinate redevelopment of several council-owned sites that are more complex to redevelop. This may be due to their risk of flooding, co-ordinate traffic improvements, pedestrianisation and improvements to the riverside and public areas of the town centre.
Character: <ul style="list-style-type: none"> • Impact on character of the area • Impact on the landscape – will dominate townscape • Buildings should be under 4-5 storeys • Developments should be in materials keeping to the surrounding buildings 	The 'Proposed Submission Local Plan: strategy and sites' site allocation policy for this site requires consideration of strategic long distant views including setting of listed buildings on skylines. It also notes that development should not be to the detriment of the character of the area, and should have particular regard to the Corridor of the River Wey conservation area.
There will be no sense of community	This would be a mixed use development, with different size flats of different tenures, attracting a variety of occupants.

<p>Need to build a new road bridge to serve both sides of the town</p>	<p>This suggested scheme is not considered necessary for the delivery of the draft Local Plan.</p> <p>The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'. Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Transport Strategy and IDP may therefore be updated to include these.</p>
<p>Developments could lead to increased crime</p>	<p>The NPPF requires that planning decisions should aim to ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. This is a consideration for the determination of a planning application.</p>
<p>Sensible provision of homes in the station area is welcome if well designed, low rise and car ownership is discouraged</p>	<p>Comment noted.</p>
<p>Station improvements will be funded through the commercial redevelopment - viability will be affected as a consequence.</p>	<p>All potential sources of funding will be considered,</p>
<p>Grampian style planning condition should be implemented</p>	<p>Grampian conditions can be attached to planning permissions where appropriate.</p>
<p>The site is within the most deprived 2.5% of LSOAs in the Country for outdoor environment</p> <p>LSOA scores in the most deprived 5% in the country</p>	<p>The Council is currently completing an Open Space Sports and Recreation Assessment which will identify areas of open space deficit. This could be used to target improvements to the public realm. The Council has a general ambition to improve the public realm in Guildford town centre and to improve links between the station area and the town centre.</p>
<p>Support introduction of rail link to Heathrow</p>	<p>Southern rail access to Heathrow airport is considered not to be a key infrastructure requirement on which the delivery of the 'Proposed Submission Local Plan: strategy and sites' depends.</p> <p>Nevertheless, southern rail access to Heathrow airport is an 'aspirational' scheme in the Council's Guildford Borough Transport Strategy (April 2016). An 'aspirational' status has been defined as 'A strong business case will need to be demonstrated in order to secure funding as the estimated cost presently exceeds typical funding envelopes and/or there are significant planning and statutory approvals to be achieved.'</p>
<p>The site is within 5km of the Thames Basin Heaths SPA, and therefore any redevelopment, especially for housing, is subject to EU/UK legislation (NPPF 119). The impact of development cannot be avoided with SANGs because there is no evidence base to support SANGs as required by NRM6 viii, NPPF 158 and 166.</p>	<p>The proposed dwellings require the provision of Suitable Alternative Natural Greenspace (SANG). The Local Plan proposes suitable SANG that will provide mitigation for this site (see Infrastructure Delivery Schedule).</p>

25 - Bedford Road surface car park and vacant Old Orleans, Guildford

Issue	Guildford Borough Council Response
Support pedestrian improvements between railway and town	No longer applicable as this site is not included as a site allocation in the 'Proposed Submission Local Plan: strategy and sites'.
Green corridor and pavement should run along side of the river	
Coordinated/ strategic approach to planning along the river side – could reduce flood plain capacity	
Current water supply network unable to support development	
Grampian style planning condition should be put in place – make sure infrastructure is in place ahead of development	
No building should be above 4 to 5 storeys	
Housing would be too close to the TBH SPA	
Oppose offices – should be housing above commercial	
LSOA scores in the most deprived 2.5% in the country	
There is potential on this site to raise the public realm up above semi-basement parking with commercial uses below residential	
Needs quality public realm	
Development needs to be integrated with the town	

26 - Bright Hill and Adult Education Centre

Issue	Guildford Borough Council Response
Views of Guildford Cathedral from the land on the north side of Pewley Downs should be protected	The 'Proposed Submission Local Plan: strategy and sites' site allocation policy for this site requires that important views from the top of the site across Guildford, and of the Cathedral are preserved.
Welcome recognition of importance of protecting views	
Object to destruction of education building – listed/ historical building	No longer applicable as this site is not included as a site allocation in the 'Proposed Submission Local Plan: strategy and sites'. The site allocation policy allocates land at Bright Hill Car Park only.
Retain buildings and convert into residential or public buildings	
Return to use as a school – solves need for school places	
	<p>The Adult Education Centre is a D1 use, as is a school, and no planning permission nor allocation is therefore needed to change its use to a school. The landowner (Surrey County Council) could use this site as a school if there were a need.</p> <p>There is need for more primary and secondary school places in Guildford town, and SCC is working with GBC to plan where these would best be accommodated. This Adult Education Centre is well used.</p>
Impact on character of Guildford	Conservation area is noted as a key consideration in Site Allocation policy A12. A planning application would be determined using all relevant planning policies, including an assessment of the impact of development on the character of the area.

The allocation of 77 units is not explained	The proposal for Bright Hill Car Park is explained in the Land Availability Assessment (LAA), the 'Proposed Submission Local Plan: strategy and sites' (site allocation policy A12) and topic paper.
Current water supply network unable to support development	Thames Water will work the planned housing into their investment programme only once a site has planning permission. Any planning application for development of the site would therefore need to be conditional on upgrades to the water supply system being implemented, with the developer paying a contribution where needed.
Grampian style planning condition should be put in place – make sure infrastructure is in place ahead of development	Grampian conditions are attached to planning permissions where appropriate.
Road infrastructure will not be able to cope	The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Transport Strategy and IDP may therefore be updated to include these. As planning applications are considered for the sites identified in the new Local Plan, additional transport schemes to address site access and other localised issues may be secured.
no reduction in public parking	The 'Proposed Submission Local Plan: strategy and sites' site allocation policy for this site requires that as much public car parking as possible is retained
Housing would be too close to the TBH SPA	The proposed dwellings require the provision of Suitable Alternative Natural Greenspace (SANG). The 'Proposed Submission Local Plan: strategy and sites' proposes suitable SANG that will provide mitigation for this site (see Infrastructure Delivery Schedule).

27 - Guildford Park Car Park, Guildford Park Road, Guildford

Issue	Guildford Borough Council Response
Wastewater network will be unable to support development	Thames Water will work the planned housing into their investment programme only once a site has planning permission. Any planning application for development of the site would therefore need to be conditional on upgrades to the water supply system being implemented, with the developer paying a contribution where needed.
Drainage infrastructure will be unable to support development	The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure to support the planned development which is expected to place extra pressure on existing infrastructure, or to need new or improved infrastructure. The IDP will be updated as further detail on supporting infrastructure is available. Developer contributions and other funding sources will be used to ensure that key infrastructure is delivered when it is needed, including at the planning application stage.
Grampian style planning condition should be put in place – make sure infrastructure is in place ahead of development	Grampian conditions can be attached to planning permissions where appropriate.
No reduction in public parking	The 'Proposed Submission Local Plan: strategy and sites' site allocation policy for

	this site allocates the land for new homes and a multi storey car park (with approximately 450 parking spaces).
No building above 4 to 5 storeys	The Proposed Submission Local Plan site allocation policy for this site requires that important views, including from the Castle across to the Cathedral, are preserved.
Provision for a new bridge	This suggested scheme is not considered necessary for the delivery of the draft Local Plan. The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'. Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Transport Strategy and IDP may therefore be updated to include these.
Housing would be too close to the TBH SPA	The proposed dwellings require the provision of Suitable Alternative Natural Greenspace (SANG). The Local Plan proposes suitable SANG that will provide mitigation for this site (see Infrastructure Delivery Schedule).
Need land allocated for education and community	The 'Proposed Submission Local Plan: strategy and sites' allocates land for education and community use. This is a sustainable location for new homes, providing affordable housing and making use of a previously developed site at low risk of flooding. Community uses are also suitable outside of town centres.
Site 37, the Land between Farnham Road and the Mount site, would be better to use as a multi-storey car park	The Land between Farnham Road and the Mount site has compromised vehicular access, and therefore is unlikely to be suitable and deliverable for a multi storey car park.
Care needs to be taken in determining development densities	Comment noted. The site allocations identify the approximate number of homes that could be suitable, but this would be determined through consideration of a planning application.

28 - York House, Chertsey Street

Issue	Guildford Borough Council Response
Current water supply network unable to support development	This site is not included as a site allocation in the 'Proposed Submission Local Plan: strategy and sites' as the site has planning permission (subject to the signing of a S106). The site is included in the Land availability Assessment (LAA, site 525).
Grampian style planning condition should be put in place – make sure infrastructure is in place ahead of development	
Housing would be too close to the TBH SPA	
The allocation could also include educational use	

29 – Jewsons, Walnut Tree Close, Guildford

Issue	Guildford Borough Council Response
Support comprehensive development of a new residential quarter	Comment noted
Development needs to be part of a town centre and/or Walnut Tree Close master plan	
Need an SPD for Walnut Tree Close	
Should be taken forward as part of an integrated plan for the Wey corridor	
<p>Impact on infrastructure:</p> <ul style="list-style-type: none"> • Medical facilities could not support new development • Drainage infrastructure could not cope • Wastewater network will be unable to support development • Current water supply network unable to support development 	<p>The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure to support the planned development which is expected to place extra pressure on existing infrastructure, or to need new or improved infrastructure. The IDP will be updated as further detail on supporting infrastructure is available. Developer contributions and other funding sources will be used to ensure that key infrastructure is delivered when it is needed, including at the planning application stage.</p> <p>Thames Water will work the planned housing into their investment programme only once a site has planning permission. Any planning application for development of the site would therefore need to be conditional on upgrades to the water supply system being implemented, with the developer paying a contribution where needed.</p>
Grampian style planning condition should be put in place – make sure infrastructure is in place ahead of development	Grampian conditions can be attached to planning permissions where appropriate.
Car parking provision needs to be established	The Proposed Submission Local Plan Policy I3 requires that developments provide off-street vehicle parking for both residential and non-residential developments at a level which prevents overspill parking on the public highway where there is a clear and compelling justification that it is necessary to manage the Local Road Network
Access for pedestrians not via Walnut Tree Close	The 'Proposed Submission Local Plan: strategy and sites' site allocation policy for this site requires that the developer works closely with Guildford Borough Council, Surrey County Council and Network Rail to ensure that the proposed layout does not prevent the replacement of Yorkie's Bridge and the provision of the Sustainable Movement Corridor
No building above 4 to 5 storeys	The Proposed Submission Local Plan: strategy and sites' site allocation policy for this site requires that the development contributes towards improving the character of the area.

Establish where land should be allocated for a new road bridge	<p>This suggested scheme is not considered necessary for the delivery of the draft Local Plan.</p> <p>The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'. Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Transport Strategy and IDP may therefore be updated to include these.</p>
Housing would be too close to the TBH SPA	The proposed dwellings require the provision of Suitable Alternative Natural Greenspace (SANG). The Local Plan proposes suitable SANG that will provide mitigation for this site (see Infrastructure Development Plan).

30 - 77 to 83 Walnut Tree Close, Guildford

Issue	Guildford Borough Council Response
Support development on this site	Comment noted
Ensure adequate parking provided	The 'Proposed Submission Local Plan: strategy and sites' Policy I3 requires that developments provide off-street vehicle parking for both residential and non-residential developments at a level which prevents overspill parking on the public highway where there is a clear and compelling justification that it is necessary to manage the Local Road Network
New properties need to be built with flooding in mind	The 'Proposed Submission Local Plan: strategy and sites' allocates this site for offices (B1a). New homes are not suitable here due to flood risk as safe access and egress cannot be achieved, and the site has not passed the flood risk sequential test for housing.
Need an SPD for Walnut Tree Close / Town Centre Master Plan	National planning policy tell us to use SPDs only where they can help make successful planning applications or aid infrastructure delivery.
Coordinated or master planned approach to planning along the river side – could make flood resilient outcome	<p>Guildford Borough Council is currently progressing a non-statutory town centre regeneration / delivery plan to co-ordinate redevelopment of several council-owned sites that are more complex to redevelop. This may be due to their risk of flooding, co-ordinate traffic improvements, pedestrianisation and improvements to the riverside and public areas of the town centre.</p> <p>Any policies in a SPD must not conflict with the adopted development plan. It is difficult to produce SPD that we know would not conflict with a new Local Plan that has not yet been submitted for be independently examination.</p>
Housing would be too close to the TBH SPA	The proposed dwellings require the provision of Suitable Alternative Natural Greenspace (SANG). The Local Plan proposes suitable SANG that will provide

	mitigation for this site (see Infrastructure Development Plan).
No building above 4 to 5 storeys	The site is in the corridor of the River Wey. The 'Proposed Submission Local Plan: strategy and sites' allocation policy for this site identifies the opportunity for a contemporary design approach, whilst respecting the proximity to the River Wey.
Development should contribute to the objective of an attractive pedestrian path and green corridor along both sides of the river	The 'Proposed Submission Local Plan: strategy and sites' site allocation policy for this site identifies the opportunity to improve the links along the river and to and from the town centre, and to improve green infrastructure provision on site to help improve the character of the area, given the extent of previously developed land
River side should be an open space	
Current water supply network unable to support development	Thames Water will work the planned housing into their investment programme only once a site has planning permission. Any planning application for development of the site would therefore need to be conditional on upgrades to the water supply system being implemented, with the developer paying a contribution where needed.
Grampian style planning condition should be put in place – make sure infrastructure is in place ahead of development	Grampian conditions can be attached to planning permissions where appropriate.
Consideration of access of Walnut Tree Close	There are two vehicular accesses on to Walnut Tree Close.

31 - BT Telephone Exchange

Issue	Guildford Borough Council Response
Impact on character of area: <ul style="list-style-type: none"> • Object to development for housing – too dense • Impact on character – Listed buildings, historic • Impact on Conservation Area 	Comment noted. This is a previously developed site in a town centre location, with a current large building on site. A reasonably high density is likely to be appropriate on this site. Density, impact on the character of the area and the nearby conservation area would be considered in detail as part of the determination of a planning application.
Good to gain access to the unused parts of the building – use as Indoor market, work live studios	This site would be best redeveloped to provide new homes to help meet the housing need. Retail needs are proposed to be met on other sites in the main retail area.
Housing would be too close to the TBH SPA	The proposed dwellings require the provision of Suitable Alternative Natural Greenspace (SANG). The Proposed Submission Local Plan: strategy and sites' proposes suitable SANG that will provide mitigation for this site (see Infrastructure Development Plan).
Development of this site needs to be part of a town centre master plan	This site is included in the Land Availability Assessment for housing.
Increase noise pollution	Noise pollution is unlikely to be an issue in relation to a proposed residential use in a town centre location.
Increase traffic congestion – unsafe roads	The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate

	the key transport impacts of planned development. Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Transport Strategy and IDP may therefore be updated to include these. As planning applications are considered for the sites identified in the new Local Plan, additional transport schemes to address site access and other localised issues may be secured.
Parking is limited	The 'Proposed Submission Local Plan: strategy and sites' Policy I3 requires that developments provide off-street vehicle parking for both residential and non-residential developments at a level which prevents overspill parking on the public highway where there is a clear and compelling justification that it is necessary to manage the Local Road Network

32 - Buryfields House

Issue	Guildford Borough Council Response
Support development on this site	No longer applicable as this site is not included as a site allocation in the 'Proposed Submission Local Plan: strategy and sites'. The site has planning permission and is currently being developed.
GBC should lease premises while offices are being upgraded	
Current water supply network unable to support development	
Grampian style planning condition should be put in place – make sure infrastructure is in place ahead of development	
Underground parking for residents	
Housing would be too close to the TBH SPA	

33 - Guildford Crown Court, Guildford

Issue	Guildford Borough Council Response
Development is unfeasible	No longer applicable as this site is not included as a site allocation in the 'Proposed Submission Local Plan: strategy and sites'.
Redevelop the county court keep crown court	
Provision needs to be made for a walkway along the Length of the Western side of the River	
provide excellent public open space with high quality street frontages	
development must be strategically designed to manage flooding	
Housing would be too close to the TBH SPA	
Development needs to be part of a town centre master plan and integrated with the town.	
Current water supply network unable to support development	
Wastewater network will be unable to support development	
Drainage infrastructure will be unable to support development	
Grampian style planning condition should be put in place – make sure infrastructure is in place ahead of development	

Site 34 – Debenhams, Guildford

Issue	Guildford Borough Council Response
Underground parking will flood, general flooding	No longer applicable as this site is not included as a site allocation in the 'Proposed Submission Local Plan: strategy and sites'.
Support: currently an eye sore	
Support: build community facilities and parking	
Object, water supply issues. Requires infrastructure improvement	
Object, within 5km of the Thames Basin Heaths SPA,	
Object: wastewater service is not sufficient. Requires infrastructure improvement	
Support but development should allow for better access to the river	
Object: Likes Debenhams	

Site 35 - Dolphin House, North Street

Issue	Guildford Borough Council Response
Object: Eagle radio station currently in occupation.	No longer applicable as this site is not included as a site allocation in the 'Proposed Submission Local Plan: strategy and sites'.
Support: build hotel	
Object, water supply issues. Requires infrastructure improvement	
Object, within 5km of the Thames Basin Heaths SPA,	
Support	
Build bus station	

Site 36 - Guildford Borough Council Offices, Millmead, Guildford

Issue	Guildford Borough Council Response
Support: use for high-density housing.	No longer applicable as this site is not included as a site allocation in the 'Proposed Submission Local Plan: strategy and sites'.
Object, water supply issues. Requires infrastructure improvement	
Object, within 5km of the Thames Basin Heaths SPA,	

Site 37 - Land between Farnham Road and The Mount

Issue	Guildford Borough Council Response
Object: High-rise flats and high-density house will spoil the character of the neighbourhood.	A planning application would be determined using all relevant planning policies, including an assessment of the impact of development on the character of the area. The Proposed Submission Local Plan site allocation policy for this site identifies the opportunity for innovative design, taking account of minimising the impact on residents of noise from the railway lines and amenity of neighbouring properties.
Object: infrastructure: transport, parking schools, and health care will not cope.	The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure to support the planned development which is expected to place extra pressure on existing infrastructure, or to need new or improved infrastructure. The IDP will be updated as further detail on supporting infrastructure is available. Developer contributions and other funding sources will be used to

	ensure that key infrastructure is delivered when it is needed, including at the planning application stage.
Object: How can access be gained to the site?	Currently, the site has compromised access which is limited by the Farnham Road Bridge and a s.52 agreement relating to Ranger House. Due to vehicular access restrictions this site would have to be developed as a car free site with a legal agreement preventing residents from applying for a resident's parking permit. The site is well located to public transport and retail facilities. Residents would have to rely on a car club for situations where the use of a car was required. Limited vehicular access to the site should be provided for refuse collection and removal vehicles. Pedestrian access to the site could be from Farnham Road and The Mount.
Object, water supply issues. Requires infrastructure improvement	Thames Water will work the planned housing into their investment programme only once a site has planning permission. Any planning application for development of the site would therefore need to be conditional on upgrades to the water supply system being implemented, with the developer paying a contribution where needed.
Object, within 5km of the Thames Basin Heaths SPA,	The proposed dwellings require the provision of Suitable Alternative Natural Greenspace (SANG). The Local Plan proposes suitable SANG that will provide mitigation for this site (see Infrastructure Development Plan).
Object: don't build on green areas	Whilst the site is primarily greenfield, it is within a town centre location. The 'Proposed Submission Local Plan: strategy and sites' site allocation policy for this site requires that valuable trees are retained where possible, particularly at site boundaries.
Object: should be a Car park which would free up other sites for development	There is limited vehicular access to the site.

Site 38 - The Library, North Street, Guildford

Issue	Guildford Borough Council Response
Don't move library, could reduce size of library	No longer applicable as this site is not included as a site allocation in the Proposed Submission Local Plan: strategy and sites
Object, water supply issues. Requires infrastructure improvement	
Object, within 5km of the Thames Basin Heaths SPA,	
Object: library is useful and attracts foot fall and a nice building	
Support	
Object: infrastructure: transport, parking schools, and health care will not cope.	
Object, housing will not be affordable	

Site 39: bus depot, Leas Road, Guildford

Issue	Guildford Borough Council Response
Object: flooding	No longer applicable as this site is not included as a site allocation in the 'Proposed Submission Local Plan: strategy and sites'
Bus Depots are useful and another one should be identified before developing this one. especially if it is the goal of the local plan is to improve bus services.	
Support although flooding need to be addressed	

Object, water supply issues. Requires infrastructure improvement	
Object, within 5km of the Thames Basin Heaths SPA, support	
Object: infrastructure: transport, schools, and health care will not cope.	
Should be part of master plan. Build bridge. Regenerate river side, address flooding	

Site 40 - 40 Guildford Methodist Church, Guildford

Issue	Guildford Borough Council Response
Object, water supply issues. Requires infrastructure improvement	No longer applicable as this site is not included as a site allocation in the Proposed Submission Local Plan: strategy and sites. The site has planning permission.
Object, within 5km of the Thames Basin Heaths SPA,	
Object to housing. Useful community space that should be kept that way	
Should be part of master plan. Build bridge. Regenerate river side, address flooding	

Site 41 - Pembroke House, Guildford

Issue	Guildford Borough Council Response
Object, water supply issues. Requires infrastructure improvement	No longer applicable as this site is not included as a site allocation in the Proposed Submission Local Plan: strategy and sites.
Object, within 5km of the Thames Basin Heaths SPA,	
Need to be part of a master plan. provide a new bridge over the river and the railway. Regenerate riverside park. Manage flooding	

Site 42- Riverside Business Park, Walnut Tree Close, Guildford

Issue	Guildford Borough Council Response
Concerns that infrastructure: traffic, parking, roads, public transport, hospitals, schools are already struggling to keep up with demand	No longer applicable as this site is not included as a site allocation in the 'Proposed Submission Local Plan: strategy and sites'.
Object, housing will overlook existing residences.	
Need SPD for Walnut Tree Close. Green space	
Needs to be part of a master plan	
Support development	
Issue with wastewater services. Requires improvement before development.	
Object: within 5km of the Thames Basin Heaths SPA,	

Comments on Sites within Guildford urban area

43 Land at Guildford Cathedral, Guildford

Issue	Guildford Borough Council Response
Object to proposed site allocation.	Comment noted.
Support proposed site allocation.	Comment noted.

Issue	Guildford Borough Council Response
Concern about the loss of views of the cathedral from various view points across the town.	The 'Proposed Submission Local Plan: strategy and sites' site allocation for this site requires that strategically important views of the Cathedral and its setting across the town are retained.
Concern about the loss of trees/shrubs/hedge.	The 'Proposed Submission Local Plan: strategy and sites' site allocation says, "the loss of greenfield requires provision of sufficient integral green infrastructure to enable connectivity of spaces and habitats".
Concern about loss of green spaces / protected open space.	The 'Proposed Submission Local Plan: strategy and sites' site allocation says, "Whilst there will be an overall loss of open space, development proposals should incorporate attractive pockets of open space and green infrastructure within the development site, linking to green spaces outside of the site and helping to lessen the impact of the loss".
Concern about impact on wildlife / eco system.	The 'Proposed Submission Local Plan: strategy and sites' site allocation says, "the loss of greenfield requires provision of sufficient integral green infrastructure to enable connectivity of spaces and habitats".
Concern about impact on general well being.	Comment noted.
Concern about quality of life for current residents during process of building.	Conditions are often applied to planning permissions governing the hours of development operations. These are enforceable.
Concern about impact on the environment.	The 'Proposed Submission Local Plan: strategy and sites' needs to balance competing demands, and positively seek opportunities to meet the development needs of the area.
Concern about increased traffic congestion.	The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'. Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Transport Strategy and IDP may therefore be updated to include these. As planning applications are considered for the sites identified in the new Local Plan, additional transport schemes to address site access and other localised issues may be secured.
Concern about road safety.	
Concern about impact on school places / medical facilities.	The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure to support the planned development which is expected to place extra pressure on existing infrastructure, or to need new or improved infrastructure. The IDP will be updated as further detail on supporting infrastructure is available. Developer contributions and other funding sources will be used to ensure that key infrastructure is delivered when it is needed, including at the planning application stage.
General concerns about infrastructure provision.	
Concern about affordable housing / affordable housing being converted to buy to	We cannot over-ride buy to let, which sees affordable homes purchased into the

Issue	Guildford Borough Council Response
let.	market. These can then be rented out or purchased for buy to let. This is based on national legislation.
Concern about impacts of this development in combination with Blackwell Farm.	The Sustainability Appraisal considers the impacts of the overall quantum of proposed development.
Concern about impact on character of area.	Any proposals will need to demonstrate at planning application stage that they are of high quality design and in keeping with the character of the surrounding area. In response to this concern the Proposed Submission Local Plan includes a new policy on development in urban areas and inset villages.
Development would detract from the appeal of Guildford Cathedral as a historic, Grade II listed landmark, setting of listed building.	The 'Proposed Submission Local Plan: strategy and sites' site allocation for this site requires that strategically important views of the Cathedral and its setting across the town are retained, and requires that development is sensitive to the setting of the Grade II* listed building (Guildford Cathedral).
The cathedral should be a peaceful place.	Comment noted.
This is greenfield land.	Comment noted.
Proposal too dense.	The number of homes proposed for this site is less in the 'Proposed Submission Local Plan: strategy and sites' than in the Draft Local Plan: strategy and sites (2014).
Suggest an access road from the University roundabout or Cathedral approach.	Access to the site can be achieved by the construction of new priority junctions from Alresford Road and Ridgemount. Pedestrian routes through the site connecting to the existing footpath system in Cathedral owned land will also be important to enable access to be provided to the University.
This land was gifted to the cathedral.	Comment noted.
Importance of good design.	The 'Proposed Submission Local Plan: strategy and sites' site allocation requires that development Sensitive to the setting of the Grade II* listed building (Guildford Cathedral).
Support specialist housing here.	Comment noted. Specialist housing is to be provided on some sites allocated in the Proposed Submission Local Plan: strategy and sites.
Important development is mixed use and not just housing.	Comment noted. Some mixed-use sites are allocated in the Proposed Submission Local Plan: strategy and sites to help meet identified development needs, but this is not necessary for all sites.
Site not suitable because access is inadequate.	Access to the site can be achieved by the construction of new priority junctions from Alresford Road and Ridgemount. Pedestrian routes through the site connecting to the existing footpath system in Cathedral owned land will also be important to enable access to be provided to the University.
Site not suitable because of loss of protected open space.	The 'Proposed Submission Local Plan: strategy and sites' site allocation says, "Whilst there will be an overall loss of open space, development proposals should incorporate attractive pockets of open space and green infrastructure within the development site, linking to green spaces outside of the site and helping to lessen the impact of the loss".
Site not suitable because of increased surface run off.	The site is at low risk of fluvial flooding. As the site is over 1ha, a flood risk

Issue	Guildford Borough Council Response
	assessment would be required to support a planning application.
Site not suitable because of subsidence issues in local area.	This is a consideration for the developer.
Site not suitable because of potential overlooking of existing properties.	To be considered at the planning application stage.
Site not suitable because of increase noise / vehicle noise.	
The site is within 5km of the Thames Basin Heaths SPA, and therefore any redevelopment, especially for housing, is subject to EU/UK legislation (NPPF 119). The impact of development cannot be avoided with SANGs because there is no evidence base to support SANGs as required by NRM6 viii, NPPF 158 and 166.	The proposed dwellings require the provision of Suitable Alternative Natural Greenspace (SANG). The Proposed Submission Local Plan: Strategy and Sites proposes suitable SANG that will provide mitigation for this site (see Infrastructure Delivery Plan).
Question why east slope and not west? Access would be easier.	The site allocation reflects the land that is available for development.
The ancient tithe hedge running along Ridgemount and Alresford Road is an important protected feature for this area and any suggestion of it being removed would be a loss to the local heritage.	In any future proposals for the site we will seek appropriate landscape assessments of the site, including the existing trees and hedges; their condition and value, and the impact of any development upon them, including future maintenance, and will seek to protect existing trees and mature hedges of significance, and the provision of new planting schemes as appropriate.
Concern about water and waste water supply.	Thames Water will work the planned housing into their investment programme only once a site has planning permission. Any planning application for development of the site would therefore need to be conditional on upgrades to the water supply system being implemented, with the developer paying a contribution where needed.
This site should include the provision or safeguarding of a route for a public walkway (integrated with the Guildford Park Car Park site) from the station and town centre to the Cathedral as none currently exists.	<p>This site does not adjoin the Guildford Park Car Park site. Nevertheless, the 'Proposed Submission Local Plan: strategy and sites' site allocation requires that "Pedestrian routes through the site connecting to the existing footpath system in Cathedral owned land which also enables access to the University of Surrey's Stag Hill campus". In respect of the Guildford Park Car Park site and the Land west of Guildford railway station site, the 'Proposed Submission Local Plan: strategy and sites' site allocations set out the opportunity to create a new pedestrian and cycle route on the west side of the railway tracks between these sites, with an onward connection into the existing or an improved pedestrian bridge linking to the Land and buildings at Guildford railway station site.</p> <p>If the above requirements and opportunities are realised, there will be a pedestrian route between the Land at Guildford cathedral site to Guildford railway station via the University of Surrey's Stag Hill campus, the Guildford Park Car Park site and the Land west of Guildford railway station site.</p>

44 Merrow depot, Merrow Lane, Guildford

Issue	Guildford Borough Council Response
Object to proposed site allocation.	No longer applicable as this site is not included as a site allocation in the 'Proposed Submission Local Plan: strategy and sites'.
Support proposed site allocation.	

redevelopment would make better and quieter use of site.	The site is proposed to be part of a Strategic Employment Site in the 'Proposed Submission Local Plan: strategy and sites'.
The proposed station is not backed by evidence.	
No consideration of impact on local infrastructure.	
Increased traffic congestion.	
Support is subject to access and Infrastructure improvements.	
Support proposed train station.	
Land needs to be reserved for the station in the Local Plan.	
Site should be planned and brought forward with Gosden Hill.	
Site suitable for smaller housing, as lot of family housing in area.	
Density should be 45 dph.	
PDL so sensible to redevelop.	
Proposed alternative use - Secondary school (preferable location to West Clandon and more sustainable).	
The site is within 5km of the Thames Basin Heaths SPA, and therefore any redevelopment, especially for housing, is subject to EU/UK legislation (NPPF 119). The impact of development cannot be avoided with SANGs because there is no evidence base to support SANGs as required by NRM6 viii, NPPF 158 and 166.	
TW concerns about water supply capability.	

45 Land adjoining the new Guildford fire station, Guildford

Issue	Guildford Borough Council Response
Support proposed site allocation.	No longer applicable as this site is no longer included as a site allocation in the 'Proposed Submission Local Plan: strategy and sites'. The site has since gained planning permission for a non-food retail warehouse (Use Class A1) (ref: 15/P/02450).
Object to proposed site allocation.	
Need new fire station.	
Support elderly care housing on this site.	
Oppose executive homes on this site.	
PDL so sensible to redevelop.	
Too high density.	
Impact on infrastructure.	
Residential use not suited next to fire station.	
TW Concern about water supply capability.	
No amenities for elderly or affordable housing	
Office use may be more appropriate.	
The site is within 5km of the Thames Basin Heaths SPA, and therefore any redevelopment, especially for housing, is subject to EU/UK legislation (NPPF 119). The impact of development cannot be avoided with SANGs because there is no evidence base to support SANGs as required by NRM6 viii, NPPF 158 and 166.	

46 Former Pond Meadow School, Guildford

Issue	Guildford Borough Council Response
Support proposed site allocation.	Comment noted.
Object to proposed site allocation.	Comment noted.
Shortage of school places, therefore do not replace with housing.	This site is needed for other community use (GPs surgery, dentist, youth and community centre), and the site is next to two other schools.. Some homes may need to be developed on the site to help to fund the community uses.
New homes would cause overcrowding in local area.	New homes are proposed to assist with the funding on the community hub. This is a small number of homes in an already residential area.
Concern about infrastructure provision.	The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure to support the planned development which is expected to place extra pressure on existing infrastructure, or to need new or improved infrastructure. The IDP will be updated as further detail on supporting infrastructure is available. Developer contributions and other funding sources will be used to ensure that key infrastructure is delivered when it is needed, including at the planning application stage.
Impact on parking.	Appropriate parking will need to be provided, in accordance with relevant planning policy requirements.
PDL so sensible to redevelop.	Comment noted.
Disadvantaged area with significant needs.	The site is allocated in the 'Proposed Submission Local Plan: strategy and sites' to provide a community hub, to be of benefit to the local community.
Support use of site for school/ education/ training centre.	Comment noted. The 'Proposed Submission Local Plan: strategy and sites' allocates the site for a community hub providing approximately:
Support use of site for parking.	<ul style="list-style-type: none"> • 800 sq m of medical centre (D1), and • 800 sq m of youth and community centre (D1)
Support use of site for medical centre/ walk in centre.	
Support use of site for community centre/ facility.	
Support use of site for park/sports facilities.	
Support use of site for student accommodation.	To assist with funding the redevelopment of this vacant former school site for a community hub, the site is also allocated for approximately 10 homes (C3)
Support use of site for specialist housing.	
Support use of site for affordable housing for older people.	
Support use of site for youth club /meeting room.	
Support use of site for library.	
The site is within 5km of the Thames Basin Heaths SPA, and therefore any redevelopment, especially for housing, is subject to EU/UK legislation (NPPF 119). The impact of development cannot be avoided with SANGs because there is no evidence base to support SANGs as required by NRM6 viii, NPPF 158 and 166.	The proposed dwellings require the provision of Suitable Alternative Natural Greenspace (SANG). The 'Proposed Submission Local Plan: strategy and sites' proposes suitable SANG that will provide mitigation for this site (see Infrastructure Delivery Plan).
Thames Water – no concerns.	Thames Water has confirmed that water supply and waste water supply are likely to be adequate.
If Kings College used it as a 6th form it would free up much needed space within	Kings College currently has capacity

Issue	Guildford Borough Council Response
Kings College for increasing pupil numbers.	

47 Guildford College

Issue	Comment
Support excellent work of Guildford collage. Concern about intensification on neighbouring areas.	<p>The 'Proposed Submission Local Plan: strategy and sites' site allocation for Guildford college has changed.</p> <p>The Draft Local Plan: strategy and sites (2014) identified opportunities to provide an intensified education use on this site, to enable the college to meet its future needs. This could be achieved through submission of a planning application.</p> <p>The 'Proposed Submission Local Plan: strategy and sites' allocates part of this site for housing and D1 floorspace.</p>

48 Slyfield Area Regeneration Project, Guildford (SARP)

Issue	Comment
Object to proposed site allocation.	Comment noted.
Support proposed site allocation.	Comment noted.
Support as long as infrastructure put in place.	Comment noted.
Support as long as maximum affordable housing provided.	Comment noted.
No evidence site is deliverable.	<p>The site is categorised as delivering new development in the 6-10 and 11-15 years of the Local Plan. Sites identified as delivering new homes in this period must be considered developable, rather than deliverable (NPPF, page 12).</p> <p>With regards to SARP, Guildford Borough Council Executive agreed to release funding of £390,000 to secure consultants to advise on the delivery structure and initial preparatory works required for the project.</p> <p>In addition, the site has been designated a housing zone by the Homes and Communities Agency, which enables money to be borrowed at low interest rates to fund the scheme. The project requires high upfront capital to start development of this site, which includes the relocation of the existing sewage works, and council depot, associated infrastructure and site remediation that is required before housing can be built. The designation as a housing zone means that access to cheaper borrowing has been unlocked.</p>
<p>Concerns about flood risk:</p> <ul style="list-style-type: none"> Partly within flood zone 3b Proposed link road in flood zone 3b 	A small part of the site is within flood zone 2 (medium risk). The site would be designed sequentially, to avoid development of land within flood zone 2. Safe access and egress to the site should be achievable to the west of the site boundary.

Issue	Comment
<ul style="list-style-type: none"> History of flooding Increase flood risk in nearby areas. 	See the Level 2 SFRA and sequential test for more information.
Area already over developed.	<p>The land proposed to be allocated for SARP is separate land to the current Slyfield industrial estate. The SARP allocation does not propose intensification of Slyfield industrial estate.</p> <p>SARP proposes to develop land that is within Guildford urban area, which is a sustainable location for development, and features high up our spatial hierarchy.</p>
<p>Traffic:</p> <ul style="list-style-type: none"> Area already congested Impact on transport infrastructure & congestion. 	The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development.
<p>Public transport:</p> <ul style="list-style-type: none"> Need adequate public transport as part of SARP Supports Sustainable Movement Corridor route to the site. 	<p>The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'. Several schemes are included that will address access and transport issues in this area including SRN1, SRN2, SRN9, LRN8, SMC5, AM2 and AM3.</p> <p>Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Guildford Borough Transport Strategy and IDP may therefore be updated to include these. As planning applications are considered for the sites identified in the new Local Plan, additional transport schemes to address site access and other localised issues may be secured.</p>
<p>A3:</p> <ul style="list-style-type: none"> Support re routing A3 A new four-way A3 junction at the A320 Stoke Interchange should enable a much more viable expansion of Slyfield. 	<p>The Government's Road Investment Strategy (March 2015) mandates Highways England to improve the existing A3 Guildford from the A320 Stoke Interchange to the A31 Hog's Back junction with the A31, with associated safety improvements. In announcing the Road Investment Strategy in December 2014, the Government described the improvement as involving the widening of the carriageways. The A3 Guildford scheme is now being planned by Highways England.</p> <p>Highways England is also investigating an alternative option of an A3 Guildford tunnel, with the existing road detrunked and retained for local traffic movements.</p> <p>Highways England is not considering re-rerouting the A3 trunk road and has not indicated that it is considering a new four-way A3 junction at the A320 Stoke Interchange.</p>
Consider a park and ride facility to take some pressure off the A320 and Clay Lane.	A Northern Park and Ride scheme is considered not to be a key infrastructure requirement on which the delivery of the 'Proposed Submission Local Plan: strategy and sites' depends.

Issue	Comment
	<p>At this time, we do not consider that there is a strong business case for a Northern Park and Ride scheme. Nevertheless, a Northern Park and Ride scheme is an 'aspirational' scheme in the Council's Guildford Borough Transport Strategy (April 2016). An 'aspirational' status has been defined as 'A strong business case will need to be demonstrated in order to secure funding as the estimated cost presently exceeds typical funding envelopes and/or there are significant planning and statutory approvals to be achieved.'</p> <p>Several schemes are included in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites' that will address access and transport issues in this area including SRN1, SRN2, SRN9, LRN8, SMC5, AM2 and AM3.</p>
Support Clay Lane Link Road.	Comments noted.
Clay Lane Link Road should be completed before any additional development.	
Concern Clay Lane Link Road will increase traffic.	
Clay Lane Link Road will not solve the problem of traffic congestion.	The Clay Lane Link Road scheme is considered not to be a key infrastructure requirement on which the delivery of the 'Proposed Submission Local Plan: strategy and sites' depends.
Concern about suitable access.	<p>Potential vehicular access for residential development and community facilities could be achieved via Mangles Road, Bellfields Road, Slyfield Green and the existing Council depot access off the A320 Woking Road.</p> <p>Vehicular access to the new council waste management depot, waste facilities and new sewage treatment works will be via Moorfield Road and Westfield Road.</p> <p>See LAA site 245 for further information on access and transport.</p>
Impact on sewage infrastructure / water infrastructure.	The SARP site includes Thames Water's Guildford Sewage Treatment Works site. Thames Water Utilities Ltd (TWUL) is working with the Council regarding the redevelopment of the SARP site and the potential relocation of the Sewage Treatment Works. TWUL's asset modellers have highlighted that the current water and wastewater network in this area is unlikely to be able to support the demand anticipated from this development without additional network infrastructure reinforcement. As in all cases where water and wastewater network capacity constraints are identified, TWUL will work the developers to ensure sufficient capacity is in place to support the proposed development.
Impact of development on community in Jacobs Well.	The NPPF says that "Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions." The details of a development proposal and impacts on neighbouring areas would be considered in more detail during the determination of a planning application.
Negative impact on biodiversity:	The 'Proposed Submission Local Plan: strategy and sites' site allocation requires

Issue	Comment
<ul style="list-style-type: none"> • Concern that it will destroy a valuable green corridor • Concern about adverse impact on wildlife / habitats • Concern that it will reduce biodiversity • Remove natural carbon sinks • Loss of trees • Impact of development on SPA/SSSI. 	green corridors and linkages to habitats outside of the site, given the site's proximity to greenfield, natural floodplain and SNCI
<p>Impact on infrastructure:</p> <ul style="list-style-type: none"> • Increase noise / pollution • Impact on local schools / doctors. 	The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure to support the planned development which is expected to place extra pressure on existing infrastructure, or to need new or improved infrastructure. The IDP will be updated as further detail on supporting infrastructure is available. Developer contributions and other funding sources will be used to ensure that key infrastructure is delivered when it is needed, including at the planning application stage.
Need local services as part of SARP.	Retail needs for strategic sites are considered in the Retail and Leisure update Study 2015.
Access to suitable outdoor recreational facilities and fresh air for children.	This land is currently Sewage treatment works, former landfill site, Council depot, community hall and allotments.
Close to River Wey.	Comment noted.
Loss of allotments.	The 'Proposed Submission Local Plan: strategy and sites' site allocation requires that the allotments on the site are retained or re-provided elsewhere.
Multipurpose community sports facility instead of football ground.	This comment relates to the proposed community football ground in the draft Local Plan (2014). This is no longer applicable as this site is not included as a site allocation in the 'Proposed Submission Local Plan: strategy and sites'.
Support regenerating unused space.	Comment noted.
Concern where waste facilities will be moved to.	The Sewage Treatment Works are to be relocated within the site.
<p>Sewage works:</p> <ul style="list-style-type: none"> • Sewage treatment works smells and problems with flies • Sewage treatment works needs to be moved and modernised. 	The Sewage Treatment Works are to be improved and relocated within the site.
Development should be accelerated.	This is a complex site, involving more than one landowner. The Council is actively encouraging redevelopment.
Concern about inclusion of traveller pitches.	<p>The NPPF says, "To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community" (page 13). The Proposed Submission Local Plan proposes to amend Green Belt boundaries to meet the need for housing (C3), employment land, and traveller accommodation.</p> <p>All sites of 500 homes or more will be required to provide some traveller</p>

Issue	Comment
	accommodation, to help create sustainable, inclusive and mixed communities, and to help meet the identified need for Traveller accommodation.
The site is within 5km of the Thames Basin Heaths SPA, and therefore any redevelopment, especially for housing, is subject to EU/UK legislation (NPPF 119). The impact of development cannot be avoided with SANGs because there is no evidence base to support SANGs as required by NRM6 viii, NPPF 158 and 166. / TBH SPA mitigation needed.	The proposed dwellings require the provision of Suitable Alternative Natural Greenspace (SANG). The Local Plan proposes suitable SANG that will provide mitigation for this site (see Infrastructure Delivery Plan).
Small part is in Green Belt.	The site is in Guildford urban area, outside of the Green Belt. The site adjoins the Green Belt.
Site could potentially accommodate more than 1000 homes.	The proposed site allocation is for approximately 1000 homes. If planning permission is gained for more homes, they will count towards supply, although this may be beyond this plan period (post 2033).
River Wey and green corridors: <ul style="list-style-type: none"> • Important views and area around River Wey protected • Development needs to be a soft green edge of Guildford • Density should be sensitive to river corridor and being edge of town. 	The 'Proposed Submission Local Plan: strategy and sites' site allocation requires that there is sensitive design at site boundaries that has significant regard to the transition from urban to Green Belt, particularly with regards to the open fields from between Clay Lane and the site, which is high sensitivity Green Belt (as shown in the Green Belt and Countryside Study).
Density and height: <ul style="list-style-type: none"> • Too dense • No building should be over 5 storeys. 	The Proposed Submission Local Plan allocates the site for approximately 1000 homes. This is an approximate figure, and the exact capacity of the site would be determined by a planning application.
A more natural river alignment should be reinstated.	The Council continues to work closely with the Environment Agency to consider flood risk reduction. There are no proposals at present to realign the river.
Issues with transporting sewage by road.	<p>The new sewage treatment works is expected to generate approximately the same number of lorry movements as the existing facility.</p> <p>At present, both dewatering and lime stabilisation processes take place at the Slyfield facility. The resulting product is then distributed by lorry to the agricultural sector. With the new sewage treatment works, dewatering will take place in Guildford, after which the sludge cake will be transported to a Thames Water facility in Basingstoke where the final process will be undertaken to generate power.</p>
Impact on local wildlife site. This allocation lies within a local wildlife site. Any development brought forward should fully assess the impacts on the local wildlife site, and to avoid and mitigate for any impacts arising.	The site is adjacent to a SNCI. The proposed site allocation policy requires "Green corridors and linkages to habitats outside of the site, given the site's proximity to greenfield, natural floodplain and SNCI". Natural England will be consulted when a planning application is submitted
Thames Water should consider a small bio-digestive site to help power the local area with electricity DLPSA/4441.	Policy D2 supports decentralised and low carbon energy and requires developments at the scale of SARP to consider the use of district heating and cooling systems. A bio-digester would be therefore be supported by this policy.
Utilise current wetland into formal wetland area that provide some financial benefit to the area.	The Council is currently considering a scheme for Burpham Court Farm that could include SANG, conservation, wetland habitat, improvements to water quality and an element of commercial activity that complements the other uses. Wetlands provide

Issue	Comment
	floodwater storage that protects land elsewhere, including the highly valued commercial land in Guildford town centre.
Walnut Tree Close uses relocated to Slyfield.	There may be opportunities for business to relocate to Slyfield when SARP is delivered. New Light industrial (B1c) / Trade counters floorspace is proposed as part of the redevelopment.
A permanent strip of bunded woodland could be created to demarcate the boundary between Jacobs Well and the Guildford urban area the remainder of the strip and the area above the areas of flood risk should be capable of significant expansion.	We are retaining the extent of the Green Belt between the Guildford urban area and Jacobs Well in the 'Proposed Submission Local Plan: strategy and sites'.
Include a community 'health' building.	The proposed site allocation includes community facilities (D1).

49 Bishops Nissan Garage, Walnut Tree Close, Guildford

Issue	Comment
Object to proposed site allocation.	No longer applicable as this site is not included as a site allocation in the 'Proposed Submission Local Plan: strategy and sites'.
PDL so sensible to redevelop.	
Ensure flood mitigation.	
Ensure sufficient parking.	
Need a SPD for Walnut Tree Close / TC masterplan.	
TW concern about water supply capability.	
Need to consider access.	
Important riverside site, scope for public open space.	
The site is within 5km of the Thames Basin Heaths SPA, and therefore any redevelopment, especially for housing, is subject to EU/UK legislation (NPPF 119). The impact of development cannot be avoided with SANGs because there is no evidence base to support SANGs as required by NRM6 viii, NPPF 158 and 166.	

50 Kernal Court, Walnut Tree Close, Guildford

Issue	Comment
Object to proposed site allocation.	Comment noted
Previously developed land	The site is previously developed land.
Ensure sufficient parking provided.	The 'Proposed Submission Local Plan: strategy and sites' Policy I3 says, "We will expect new development to: ... • provide off-street vehicle parking for both residential and non-residential developments at a level which prevents overspill parking on the public highway where there is a clear and compelling justification that it is necessary to manage the Local Road Network • within or adjacent to Controlled Parking Zones A, B, C and D where there is existing on-street parking stress, planning permission for residential developments will be subject to a planning obligation to require that future occupants will not be eligible for on-street residents parking permits ..."

Issue	Comment
	The site is located in Controlled Parking Zone A.
Student accommodation: <ul style="list-style-type: none"> • Not suitable for student accommodation • Support student accommodation. 	The proposed site allocation allocates the land for new homes (C3). It would be prudent to avoid an overconcentration of specific purpose built student accommodation within this locality. The most appropriate use of the land is for use class C3 housing that can flexibly meet the needs of our local population, including but not restricted to students who wish to live in the local community rather than on campus.
Increase traffic congestion.	The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'. Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Transport Strategy and IDP may therefore be updated to include these. As planning applications are considered for the sites identified in the new Local Plan, additional transport schemes to address site access and other localised issues may be secured.
Height/density of development: <ul style="list-style-type: none"> • Potentially too high density • Concern about height of buildings. 	<p>The proposed site allocation requires that design responds positively to the changing character of this area, whilst being sensitive to the Corridor of the River Wey.</p> <p>Whilst the proposed site allocation allocates the site for approximately 100 homes, the suitability of this will be considered in more detail during the determination of a planning application, when all material planning considerations can be considered.</p>
Need SPD for Walnut tree Close / integrated approach / Town centre masterplan.	The Council is committed to considering the preparation of a Town Centre Area Action Plan in the future, to assist with appropriate development in the town centre.
Loss of employment land.	The site is not part of a Strategic Employment Site. With the changing nature of Walnut Tree Close the current B8 use may be unsuitable in a residential area. Paragraph 51 of the NPPF states that planning applications for a change to residential use from commercial buildings should normally be approved provided that there are not strong economic reasons why such development would be inappropriate.
The site is within 5km of the Thames Basin Heaths SPA, and therefore any redevelopment, especially for housing, is subject to EU/UK legislation (NPPF 119). The impact of development cannot be avoided with SANGs because there is no evidence base to support SANGs as required by NRM6 viii, NPPF 158 and 166.	The proposed dwellings require the provision of Suitable Alternative Natural Greenspace (SANG). The 'Proposed Submission Local Plan: strategy and sites' proposes suitable SANG that will provide mitigation for this site (see Infrastructure Delivery Plan).
TW concern about water supply capability.	Thames Water will work the planned housing into their investment programme only

Issue	Comment
	once a site has planning permission. Any planning application for development of the site would therefore need to be conditional on upgrades to the water supply system being implemented, with the developer paying a contribution where needed.

51 Land at Westway, off Aldershot Road, Guildford

Issue	Comment
Object to proposed site allocation.	Comments noted.
Support proposed site allocation.	
Previously developed land (PDL).	The site is previously developed land.
Proposed alternative uses: <ul style="list-style-type: none"> • Park and ride for hospital • Short stay car park • Specialist housing for elderly. 	<p>The site was previously used as a temporary "Park and Ride" car park for the staff of Royal Surrey County Hospital, for which the landowner expected the use to continue until about 2020. To this end, with the agreement of the hospital, the landowner applied for and received a further temporary five year planning consent for this use in early 2015. However, the car park is now no longer needed for that period of time, and the land is now for sale.</p> <p>Although there is a need within the ward for a C2 use (including specialist housing for the elderly), the site is considered most suited to C3 residential use with potentially an element of homes suitable, flexible and adaptable for those in later life.</p>
Density: <ul style="list-style-type: none"> • Proposed number of homes is the maximum that would be suitable • Too dense. 	Whilst the proposed site allocation allocates the site for approximately 38 homes, the suitability of this will be considered in more detail during the determination of a planning application, when all material planning considerations can be considered.
Query what is specialist housing?	Specialist accommodation includes hostels, homes for those in later life such as extra care housing, homes for those with disabilities and support needs, and residential institutions.
Query what is affordable housing?	<p>Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market.</p> <p>See the glossary of the NPPF for further details.</p>
Development should only take place when suitable alternative parking has been provided for hospital staff.	The site is no longer needed for parking.

Issue	Comment
Transport infrastructure: <ul style="list-style-type: none"> • Severe congestion already • Impact on traffic congestion and infrastructure • Impact on pedestrian and cyclist safety. 	The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'. Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Transport Strategy and IDP may therefore be updated to include these. As planning applications are considered for the sites identified in the new Local Plan, additional transport schemes to address site access and other localised issues may be secured.
Impact on infrastructure: <ul style="list-style-type: none"> • Impact on air pollution • No mention of how infrastructure will cope • Development must be supported by relevant infrastructure • School expanded but no additional parking provided. 	The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure to support the planned development which is expected to place extra pressure on existing infrastructure, or to need new or improved infrastructure. The IDP will be updated as further detail on supporting infrastructure is available. Developer contributions and other funding sources will be used to ensure that key infrastructure is delivered when it is needed, including at the planning application stage.
The site is within 5km of the Thames Basin Heaths SPA, and therefore any redevelopment, especially for housing, is subject to EU/UK legislation (NPPF 119). The impact of development cannot be avoided with SANGs because there is no evidence base to support SANGs as required by NRM6 viii, NPPF 158 and 166.	The proposed dwellings require the provision of Suitable Alternative Natural Greenspace (SANG). The Submission Local Plan proposes suitable SANG that will provide mitigation for this site (see Infrastructure Delivery Plan).
Must make sure land free of contamination.	This site has been used as a garage and vehicle repair shop. Ground investigations have been carried out and significant amounts of soil will have to be removed and safely disposed of to allow development.
Do not support 'executive homes'.	Policy H11 of the 'Proposed Submission Local Plan: strategy and sites' states that "New residential development is required to deliver a wide choice of homes to meet a range of accommodation needs as set out in the latest Strategic Housing Market Assessment. New development should provide a mix of housing tenures, types and sizes appropriate to the site size, characteristics and location."
Thames Water reported no concerns.	In response to the consultation on the Draft Local Plan: strategy and sites (2014), Thames Water advised that based on the information available to date, they do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.

52 Wey Corner, Walnut Tree Close, Guildford

Issue	Guildford Borough Council Response
Object to proposed site allocation.	Comment noted.

Issue	Guildford Borough Council Response
PDL so sensible to redevelop.	Comment noted.
Ensure adequate parking.	<p>The 'Proposed Submission Local Plan: strategy and sites' Policy I3 says, "We will expect new development to: ... • provide off-street vehicle parking for both residential and non-residential developments at a level which prevents overspill parking on the public highway where there is a clear and compelling justification that it is necessary to manage the Local Road Network • within or adjacent to Controlled Parking Zones A, B, C and D where there is existing on-street parking stress, planning permission for residential developments will be subject to a planning obligation to require that future occupants will not be eligible for on-street residents parking permits ..."</p> <p>The site is located in Controlled Parking Zone A.</p>
Impact on traffic.	<p>The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'. Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Transport Strategy and IDP may therefore be updated to include these. As planning applications are considered for the sites identified in the new Local Plan, additional transport schemes to address site access and other localised issues may be secured.</p>
Flood risk: <ul style="list-style-type: none"> • Impact on flood risk • Flood mitigation needed. 	<p>The 'Proposed Submission Local Plan: strategy and sites' site allocation policy for this site (policy A14) requires that redevelopment achieves flood risk betterment, appropriate mitigation and flood risk management, and have regard to the recommendations of the Level 2 SFRA.</p>
Need an SPD for Walnut Tree Close.	<p>The Council is committed to considering the preparation of a Town Centre Area Action Plan in the future, to assist with appropriate development in the town centre.</p>
Thames Water – concern about water supply capability.	<p>Thames Water will work the planned housing into their investment programme only once a site has planning permission. Any planning application for development of the site would therefore need to be conditional on upgrades to the water supply system being implemented, with the developer paying a contribution where needed.</p>
B8 use not suitable.	<p>With the changing nature of Walnut Tree Close the current B8 use may be unsuitable in a residential area.</p>
No one has consulted with National Trust regarding protection of Dapdune Wharf.	<p>National Trust was consulted as part of the 2014 consultation.</p>
The site is within 5km of the Thames Basin Heaths SPA, and therefore any redevelopment, especially for housing, is subject to EU/UK legislation (NPPF 119).	<p>The proposed dwellings require the provision of Suitable Alternative Natural Greenspace (SANG). The Local Plan proposes suitable SANG that will provide</p>

Issue	Guildford Borough Council Response
The impact of development cannot be avoided with SANGs because there is no evidence base to support SANGs as required by NRM6 viii, NPPF 158 and 166.	mitigation for this site (see Infrastructure Delivery Plan).
Site between 42 & 52 not identified on the plan. Should provide a direct pedestrian & cycle route from Yorkie's bridge to the tow path (potential link to Dapdune Wharf).	It is not considered that there is a need for an additional pedestrian and cyclist route from Walnut Tree Close to the towpath at this point, given existing nearby connections to the north and to the south.
Site is dilapidated and not in keeping with Guildford's prosperity.	Comment noted. The 'Proposed Submission Local Plan: strategy and sites' site allocation for this site requires that the design responds positively to the changing character of this area, whilst being sensitive to the Corridor of the River Wey.
Ancillary areas not included on the site that are also suitable.	The 'Proposed Submission Local Plan: strategy and sites' site allocation for this site includes the whole site area.

Planning for sites – Ash and Tongham urban area

53 Ash Vehicle Centre

Issue	Guildford Borough Council Response
Object to proposed site allocation	No longer applicable as this site is no longer included as a site allocation in the Proposed Submission Local Plan.
Site is fully occupied	
Loss of small businesses	
The site is within 5km of the Thames Basin Heaths SPA, and therefore any redevelopment, especially for housing, is subject to EU/UK legislation (NPPF 119). The impact of development cannot be avoided with SANGs because there is no evidence base to support SANGs as required by NRM6 viii, NPPF 158 and	
Increase the number of people who need to commute	
Only suitable if businesses can be suitably relocated	
Should be mixed use if no longer needed	
Thames Water does not have concerns about waste water supply to this site (based on info available)	
This site adjacent to Ash station should be reserved for future railway related use - e.g. enlarged station buildings, drop off / pick up area, station car park - to anticipate increased rail usage. Potential use as a park and ride by train facility for Guildford, Reading, etc. There is very limited car parking at Ash station - about 22 spaces on the north side of the station. Demand for parking by rail users is much more than this, and cars are parked on-street nearby.	Whilst this site is no longer included as a site allocation in the Proposed Submission Local Plan, land near to this site is proposed to be allocated for a new road bridge and footbridge to enable the closure of the level crossing on the A323 Guildford Road, adjacent to Ash railway station. This site is within the urban area, and should the land become available for redevelopment, possible uses could be considered in relation to the needs of the railway station, and the proposed railway bridge.

54 Public House, The Cricketers, Tongham

Issue	Guildford Borough Council Response
Object to proposed site allocation	<p>This site is no longer included as a site allocation in the Proposed Submission Local Plan, however it is identified in the Land Availability Assessment, as a realistic candidate for development, likely to deliver new homes in the 6-10 year period.</p> <p>It is previously developed land, within the urban area. Subject to consideration of all relevant planning policies, and material planning considerations, redevelopment of this site to provide new homes is likely to be possible under current national planning policy.</p> <p>The Local Plan proposes suitable SANG that will provide mitigation for this site (see Infrastructure Delivery Plan).</p>
The site is within 5km of the Thames Basin Heaths SPA, and therefore any redevelopment, especially for housing, is subject to EU/UK legislation (NPPF 119). The impact of development cannot be avoided with SANGs because there is no evidence base to support SANGs as required by NRM6 viii, NPPF 158 and	
PDL so sensible to redevelop	
Thames Water objects re waste water DLPSA/3981	

55 Tongham triangle

Issue	Guildford Borough Council Response
Support proposed site allocation	Comment noted
Some of this land on this site should be allocated for a link road between The Street (south of Manor House Flats) and Grange Road. This would allow the narrow part of The Street to be made one way southbound from Poyle Road, with the suggested link road and part of Grange Road being one way for northbound traffic from the Hogs Back towards Tongham centre. The actual distance of a link road would be about 300m.	<p>The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Transport Strategy and IDP may therefore be updated to include these. As planning applications are considered for the sites identified in the new LP, additional transport schemes to address site access and other localised issues may be secured.</p>

56 Policy for Ash and Tongham sites combined

Issue	Guildford Borough Council Response
Object to proposed site allocation	Comment noted
Support proposed site allocation	Comment noted
Site not suitable because: <ul style="list-style-type: none"> • Out of keeping with a country road • Impact on transport infrastructure 	<p>The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Transport Strategy and IDP may therefore be updated to include these. As planning applications are considered for the sites identified in the new LP,</p>

Issue	Guildford Borough Council Response
	additional transport schemes to address site access and other localised issues may be secured.
Site not suitable because development will result in the loss of village feel	The proposed site allocation requires recognition of the historic location of Ash Green village, and the transition from urban to rural.
Site not suitable because development will result in the creation of urban sprawl	The Proposed Submission Local Plan proposes to extend the urban area of Ash and Tongham, but protect the remaining land from inappropriate development, through the creation of new Green Belt and retention of countryside. Whilst the urban area is proposed to extend, uncontrolled sprawl is prevented.
Surface water flooding issues that are not being dealt with	The proposed site allocation requires appropriate surface water flooding mitigation measures, with specific regard to the Ash Surface Water Study
Landowner confirms part of the site under its control is suitable, available and viable for development, and is deliverable	Land that meets the NPPF assessment criteria and accords with the spatial hierarchy has been included in the proposed development area.
Sustainably located	Comment noted.
Logical extension of settlement boundary	Comment noted.
Identified in GBCS	Comment noted.
Ranked highly in GBCS for sustainability	Comment noted.
Land outside of the identified area could provide some small homes	The Local Plan allocates sites that are key to the delivery of the overall plan. The LAA uses a site size threshold of 5 home or more. Any small sites (less than 5 homes) that gain planning permission would be counted as windfall, and still contribute towards supply. Any such proposals would need to be considered on their individual merits through the determination of a planning application.
The number of homes identified is not achievable if current densities (of sites that have permission) are continued. High rise flats would change character of area if proposed to meet density	The proposed site allocation allocates 67 ha of land for approximately 1200 homes. This is a density of 18 dph, which is relatively low for an urban area. Densities may vary between sites, and greater efficient use of land may be achieved if land owners work together, particularly if open space is planned and provided for across sites. The potential number of homes will be reviewed through updates to the Land Availability Assessment, if further land gains planning permission prior to the adoption of the Local Plan.
Infrastructure arrangements for the junction with the level crossing need careful consideration	Proposed Submission Local Plan Site allocation A30 proposes to allocate land for a new road bridge and footbridge to enable the closure of the level crossing on the A323 Guildford Road, adjacent to Ash railway station.
Thames Water raised concerns about Wastewater services, and the need for drainage infrastructure.	Thames Water will work the planned housing into their investment programme only once a site has planning permission. Any planning application for development of the site would therefore need to be conditional on upgrades to the water supply system being implemented, with the developer paying a contribution where needed.
Within this land area, sufficient land should be identified for a relief road for Ash to relieve the A323 - Ash Street, Ash Church Road and Guildford Road, Ash. This is now much more difficult now with the recently approved planning permission for 400 houses on land south of Ash Lodge Drive.	Proposed Submission Local Plan Site allocation A29 requires proposed road layout or layouts to provide connections between both the individual development sites within the site allocation and between Ash Lodge Drive and Foreman Road, providing a through road connection between Ash Lodge Drive and Foreman Road, in order to maximise accessibility and to help alleviate congestion on the A323

Issue	Guildford Borough Council Response
	corridor
<p>Land near to Ash station should be safeguarded for a bridge over the railway and the access roads to replace the level crossing at some future time. (Network Rail have a policy to replace level crossings to improve safety for rail and road users and pedestrians.) Comments for Site 53 re Ash station also apply to that part of this site on either side of the railway, as it may be needed for future railway related use. Planning application 14/P/01454 is for houses on land adjacent to Ash station level crossing - this development would restrict the construction of a bridge and approach roads at some future time. Part of the site near the level crossing and station should be safeguarded for future railway-related use, e.g car park for rail users.</p>	<p>Proposed Submission Local Plan Site allocation A30 proposes to allocate land for a new road bridge and footbridge to enable the closure of the level crossing on the A323 Guildford Road, adjacent to Ash railway station.</p>

Planning for sites – within villages

57 East Horsley Countryside depot and BT telephone exchange

Issue	Guildford Borough Council Response
Object to proposed site allocation	This site is not included as a site allocation in the 'Proposed Submission Local Plan: strategy and sites' as it does not meet the site size criteria.
No objection, because site is brownfield	
Support proposed housing	
Proposal would have a negative effect	
<p>Proposals would be out of character / negative impact on the character of the area because:</p> <ul style="list-style-type: none"> • Impact the landscape • In/ close to a conservation area • Surrounded by many listed buildings • Close proximity to St Martin's Church which dates back to Norman times • AONB nearby • Impact on the beauty of the village 	<p>The potential capacity of this site has been reduced to 15 homes, and the site included in the Land Availability Assessment (LAA) as a suitable, available and developable site, likely to deliver new homes towards the end of the plan period (years 11-15). See LAA site 90 and 353 for more information.</p> <p>This site is most suited to a residential use, given its attractive location and surrounding uses. This includes Traveller accommodation, for which it was considered in the Traveller SHLAA 2014 (1 pitch). However, whilst the site could potentially be suitable for small-scale Traveller accommodation as part of a residential development, due to viability and dual landownership, it is not thought likely that this use would be delivered on site. This site is not included with those sites identified to meet the need for Traveller accommodation over the plan period.</p>
Site not suitable for Traveller accommodation	
<p>Proposed site not suitable because:</p> <ul style="list-style-type: none"> • Many elderly people living nearby / vulnerable people/ quiet area • Residential area (in relation to proposed traveller accommodation) • Spoil locality • It would destroy the amenity value • Traffic congestion in local area / increase traffic • Overload current infrastructure 	<p>This is a previously developed site within the village. This part of the village is proposed to be inset from the Green Belt in the Proposed Submission Local Plan. Any development proposals would need to be considered through determination of a planning application, which would give consideration to the impact of development on the conservation area, and listed buildings nearby.</p>

Issue	Guildford Borough Council Response
<ul style="list-style-type: none"> • Impact on schools / schools at capacity • Problems with drainage and sewage at depot • Water supply network can't support proposed new development • Vehicles park along road • Local car parks full • Dangerous access to St Martins Close • Not an appropriate use in a village (traveller accommodation) • Access for large vehicles would be difficult 	<p style="font-size: 48px; opacity: 0.3; transform: rotate(-45deg);">Draft</p>
Fewer homes than proposed, and homes that are in character with the villiage	
Flood risk needs consideration, history of flooding in area	
No concern for residents	
Need for more car parking space in this area	
Alternative proposed use: <ul style="list-style-type: none"> • car park • affordable housing • retain as commercial site 	
Proposed number of homes too dense	
Use brownfield sites before Green Belt sites	
Object to harm/loss of Green Belt	
No exceptional circumstances demonstrated	
Where would access be?	
No objection to Wisley Airfield	
Did not receive letters regarding plans when we should have	
The evidence base is flawed (SHMA)	
Object to Settlement Boundary change in East Horsley	

58 Ramada Hotel, Guildford Road, East Horsley

Issue	Guildford Borough Council Response
Object to proposed site allocation	Comment noted
Suitable for redevelopment	Comment noted
Support conversion	Comment noted
Proposal not suitable because: <ul style="list-style-type: none"> • Severe double bend in road • Frequently traffic queues here / currently congestion • There have been traffic accidents here / dangerous for pedestrians • Roads too narrow in village • Difficult to cross the road • Access 	

Issue	Guildford Borough Council Response
<ul style="list-style-type: none"> Increase traffic/ congestion on main road and in village 	
Proposal not suitable because of negative environmental impact	The 'Proposed Submission Local Plan: strategy and sites' site allocation policy for this site requires sensitive design, siting and form of development, given the edge of village/semi-rural location and visual prominence.
Proposal not suitable because of negative impact on local amenities	The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure to support the planned development which is expected to place extra pressure on existing infrastructure, or to need new or improved infrastructure. The IDP will be updated as further detail on supporting infrastructure is available. Developer contributions and other funding sources will be used to ensure that key infrastructure is delivered when it is needed, including at the planning application stage.
Concern about the loss of an iconic building / building of historic interest	The building is not listed or locally listed.
Concern about increased parking at rail station	Comment noted.
No longer owned by Ramada, it is now owned by Legacy Hotel Group	Comment noted.
The owner apparently has no plans to sell or develop the site	The recent planning application demonstrates the owner's intent. The availability of the land for redevelopment has been confirmed by the developer for the purposes of the Local Plan.
Strange to say could be redeveloped for hotel when that is already the use	The 'Proposed Submission Local Plan: strategy and sites' site allocation policy for this site allocates the site for new homes only (C3). The loss of the hotel is a consideration, and needs to be addressed by the applicant.
Impact on character of the village	The Proposed Submission Local Plan site allocation policy for this site requires sensitive design, siting and form of development, given the edge of village/semi-rural location and visual prominence.
Impact in openness / impact on views / conservation area	
Density too high	Whilst a recent planning application for new homes on this site has been refused (ref: 15/P/02354), the reasons for refusal do not relate to over development of the site.
There isn't enough demand for 2 hotels in Horsley	The 'Proposed Submission Local Plan: strategy and sites' site allocation policy for this site allocates the site for new homes only (C3).
Extends beyond settlement boundary / do not support amendment to settlement boundary	We consider that there are exceptional circumstances that justify amending Green Belt boundaries. This includes the high level of need and insufficient alternative sites. The NPPF requires those villages that do not make an important contribution to the openness of the Green Belt to be inset.
Thames Water expressed concern regarding Wastewater Services in relation to this site	Thames Water will work the planned housing into their investment programme only once a site has planning permission. Any planning application for development of the site would therefore need to be conditional on upgrades to the water supply system being implemented, with the developer paying a contribution where needed.

Planning for sites –land around Guildford urban area

Issue	Guildford Borough Council Response
Object to draft Local Plan (LP)	Comment noted
Questionnaire: <ul style="list-style-type: none"> • Complex questionnaire • Document difficult to understand • Did not receive free papers advertising consultation 	This comment has been responded to in the table for Question 7 of the questionnaire.
Strategic Housing Market Assessment: <ul style="list-style-type: none"> • Strategic Housing Market Area (SHMA) flawed / concerned about evidence • Housing number too high • Housing need will never be satisfied – more build, more need • Guildford proposing more housing than other areas 	These comments have been responded to in the table for Appendix C: Evidence Base
Object to development at Pewley Down	Pewley Down is not included in the Proposed Submission Local Plan: strategy and sites as a site allocation.
Need affordable housing / not executive housing	The Proposed Submission Local Plan plans for approximately 40% of new homes to be affordable, and requires a mix of housing, in accordance with the need identified in the Strategic Housing Market Assessment, to make sure new development sites do not just deliver large homes.
Support Wisley	Comment noted
Support flats and higher density of PDL	Comment noted
Support regeneration of the town	Comment noted
More support needed for regeneration in north UK	Each local authority is required to meet the objectively assessed need within their housing market area.
Focus on brownfield	Brownfield land is at the top of our spatial hierarchy however, there is insufficient land to meet our objectively assessed housing needs.
Local Plan not required by Government	Having an up to date Local Plan means that we are able to plan for sustainable development and protect those areas which we wish to see free from development. It also enables us to plan for the necessary infrastructure to support this growth. The Government is seeking to bring in measures to ensure that all councils have an up to date local plan.

59 Gosden Hill Farm, NE Guildford

Issue	Guildford Borough Council Response
Number of homes for this site too high	The number of homes is appropriate to the size of the site and ensures that we make efficient use of land. The number of homes being allocated is also of sufficient scale to deliver the necessary supporting infrastructure.
Generally supportive	Comment noted
Should be extended to include Nuthill Farm	The site has been extended to include part of Guildford Borough Countryside Strategy (GBCS) land parcel C3 in order to help facilitate delivery of the secondary school whilst ensuring that the Green Belt boundary remains a defensible one. In order to ensure that sufficient separation is maintained between the site and Send Marsh, part of the extension, adjacent to the A3, will need to remain open as a green buffer.
Green belt: <ul style="list-style-type: none"> • Harm/loss of Green Belt • Create urban sprawl / urbanisation 	This comment has been responded to in the table for Policy 10
No exceptional circumstances identified	This comment has been responded to in the table for Policy 10
Biodiversity: <ul style="list-style-type: none"> • Loss of green space / trees • Impact on wildlife • Impact on ancient woodland and wetlands 	Woodland at Merrow Lane to the south west of the site is designated as an SNCI and Common Land. Cotts Wood to the east of the site is also an SNCI. There is an area of Ancient Woodland on the site. There is a Tree Preservation Order covering the site and a number of trees with high retention value. These would be retained alongside any significant hedgerows. A number of ecological baseline surveys have been undertaken on this site.
Brownfield land should be developed before Green Belt / plenty of brownfield	Brownfield land is at the top of our spatial hierarchy however there is insufficient land to meet our objectively assessed housing needs.
Infrastructure: <ul style="list-style-type: none"> • Infrastructure cannot cope with amount of growth proposed / infrastructure not given adequate consideration in the draft LP / The infrastructure proposed is not sufficient 	The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure to support the planned development which is expected to place extra pressure on existing infrastructure, or to need new or improved infrastructure. The IDP will be updated as further detail on supporting infrastructure is available. Developer contributions and other funding sources will be used to ensure that key infrastructure is delivered when it is needed, including at the planning application stage.
Impact of additional traffic / congestion / narrow road / road safety / A3	The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the

Issue	Guildford Borough Council Response
	<p>plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'. Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Transport Strategy and IDP may therefore be updated to include these.</p> <p>As planning applications are considered for the sites identified in the new LP, additional transport schemes to address site access and other localised issues may be secured.</p> <p>The site could provide a park and ride facility providing 500-700 car parking spaces in order to operate without public subsidy, with additional land reserved for potential expansion of the facility to 1,000 spaces.</p>
Impact on pedestrian safety	<p>The site will be designed so that there are safe pedestrian connections within the site to the various facilities provided and outside of the site to connect into existing pedestrian footways and footpaths using the main pedestrian desire lines to the adjacent external facilities and communities.</p> <p>The identification of the pedestrian desire lines and the detailed design of pedestrian routes will be undertaken as part of the planning application for the site, but there are not considered to be any fundamental constraints that would prevent the site from having safe pedestrian facilities to serve the future demands for pedestrians.</p>
Impact on parking	Car parking provision within the site and the impact of overspill car parking is covered by Policy I3 "Sustainable transport for new developments".
<p>Infrastructure:</p> <ul style="list-style-type: none"> • Impact on medical facilities • Impact on education services /schools • Impact on community facilities 	<p>The site will provide a local centre with a range of community uses including a General Practice (GP) surgery and community space. Formal and informal open space will be required.</p> <p>The site will provide a 2-form entry Primary School to provide for needs arising from the proposed housing on the site. The site may also potentially provide 4-form entry Secondary School, sufficient to provide for the secondary school age population on the development and in the eastern part of the borough.</p>
Flood risk/drainage	Development will need to have regard to findings and recommendations of the Guildford Surface Water Management Plan (the Burpham hotspot) and be supported by a flood risk assessment.
Impact on utilities	Water supply and wastewater network will require upgrading in order to support the proposed development. There are overhead electricity pylons crossing part of the

Issue	Guildford Borough Council Response
Pollution: <ul style="list-style-type: none"> • Impact on air pollution • Impact on noise pollution 	site from which residential development will need to be set back at least 30 metres. The site may require further noise and air quality assessment, due to its proximity to the A3, with appropriate mitigation.
Public transport inadequate	The site could provide a new railway station at Guildford East (Merrow) working with Network Rail and Surrey County Council as the landowner to the south of the railway line. The site could also provide the eastern route section of the Sustainable Movement Corridor and make a necessary and proportionate contribution to delivering the eastern route section on the Local Road Network.
Character/amenity: <ul style="list-style-type: none"> • Impact on character of area / setting of town • Impact on landscape 	At detailed masterplanning stage, the site should provide positive benefit in terms of landscape and townscape character and local distinctiveness and will have regard to the identified landscape character areas.
<ul style="list-style-type: none"> • Impact on existing properties close to site • Impact on quality of life • Impact on West Clandon 	It is considered that this could be satisfactorily addressed and mitigated at detailed design stage.
Impact on TBH SPA	Bespoke SANG will be provided by the site owner (see Infrastructure Delivery Plan).
Loss of agricultural land	The loss of agricultural land has been considered through the Sustainability Appraisal.
Support proposed train station	Comment noted
Support proposed Park and Ride and improvements to public transport networks	Comment noted
The Rights of Way network should be increased and enhanced	Surrey County Council are involved in discussions with the site promoters and the treatment of the existing Rights of Way network will need to be agreed prior to planning approval being granted
Concern about traffic associated with rail station	The impact of traffic associated with the new Guildford East (Merrow) rail station will be assessed as part of a Transport Assessment for any planning application to provide the rail station. The amount of car parking and drop-off facilities for cars will form part of this assessment. If improvements are required to the adjacent highway network then this will need to be provided as part of any planning consent.
Improved junctions at A3 needed / 4 way junction/ concerned about impact on A3 from Guildford/Waverley & Woking	The proposed access to the site will incorporate a realigned off-slip from A3 southbound with a new southbound on-slip to A3. This has been discussed with Surrey County Council and Highways England. Within the Site Policy A25 there is a requirement for the site proposals to have regard to the potential opportunity to provide an all movements junction.

Issue	Guildford Borough Council Response
Concern about viability if all infrastructure has to be provided by developer	The NPPF requires that Local Plans are supported by a Viability Study to ensure that the scale of obligations and policy burdens required by the plan do not threaten the ability of sites to be developed viably. The plan must be deliverable.
No traffic impact assessment (cumulative) Concerned about cumulative impact of development across borough / and outside borough	A cumulative transport assessment of the Local Plan proposed land uses has been undertaken by Surrey County Council using their strategic traffic model. This has also assessed the transport infrastructure mitigation proposed in the Local Plan.
Development unnecessary Too much affordable housing proposed	The West Surrey SHMA identifies a significant level of housing need, including affordable housing need
Site selected because owned by a developer	In order to allocate a site it must be suitable, available and deliverable. This site was identified in the GBCS which did not consider land ownership or availability.
Doubt affordable homes will be achieved	A proportion of the site will be affordable housing in line with our policy on affordable homes.
Good location for new secondary school	The Proposed Submission Local Plan: strategy and sites now includes provision of a 4 form entry secondary school.
Object to inclusion of traveller accommodation	<p>The NPPF says, “To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community” (page 13). The Proposed Submission Local Plan: strategy and sites proposes to amend Green Belt boundaries to meet the need for housing (C3), employment land, and traveller accommodation.</p> <p>All sites of 500 homes or more will be required to provide some traveller accommodation, to help create sustainable, inclusive and mixed communities, and to help meet the identified need for Traveller accommodation.</p>
Railway bridge constraint	This is not considered to be a fundamental constraint. The detailed impact of additional traffic on this signalised junction will be assessed in a Transport Assessment prepared as part of the planning application for this site.
Already a densely populated area	<i>Our spatial strategy is based on sustainability considerations and our spatial hierarchy rather a proportionate growth approach.</i>
Fails to identify local green space (neighbourhood plan)	The Burpham Neighbourhood Plan is now adopted and any planning application will need to be considered in accordance with this.
Site includes common land	Common land would be retained as part of the development.
Land should be safeguarded for A3 options including for a tunnel and a junction.	Within the Site Policy A25 there is a requirement for the site proposals to have regard to the potential opportunity to provide an all movements junction.

Issue	Guildford Borough Council Response
Wish to see green margin in the A3 retained	Whilst increasing the site slightly, the Proposed Submission Local Plan: strategy and sites now includes within the site allocation policy a requirement for a green buffer adjacent to the A3.
UniS generally supportive but Blackwell Farm is preferable	Comment noted
Waverley BC, potential impact on Waverley, welcome discussion of cross boundary issues	As part of discharging our legal duty to cooperate, we have continued working with Waverley to understand the impact of development on both our boroughs. See the Duty to Cooperate topic paper for more information.
Lack/ outdated of evidence to allow meaningful consultation	We have published further evidence since the last consultation. We consider the evidence base upon which the Proposed Submission Local Plan: strategy and sites is based to be robust and proportionate.
Downslopes towards the A3 important GB (C2) but could develop eastern half of the site – C1 (south of the line of trees marking the ridge)	This is not justified by the GBCS.
If station built need to have a road/footbridge linking it to Gosden Hill	There would need to be a link to both platforms, a solution could be a footbridge or an underpass. This would need to link into the Gosden Hill site as a Guildford West (Merrow) rail station is part of the transport strategy for this site.

60 Blackwell Farm, SW Guildford

Issue	Guildford Borough Council Response
Object to proposal	Comment noted
Generally supportive	Comment noted
Concern about size and number of homes	The number of homes is appropriate to the size of the site and ensures that we make efficient use of land. The number of homes being allocated is also of sufficient scale to deliver the necessary supporting infrastructure.
Support enhanced knowledge based industries at Surrey Research Park	Comment noted
UniS consider site has capacity of 2,400 A possible extension of the site would assist UniS even further (providing sustainable development) Support idea that site size should be increased to support further development and investment opportunity	The Proposed Submission Local Plan: strategy and sites includes a reduced site at Blackwell Farm in response to the landscape and Green Belt sensitivity of the southern part. There is also a small extension to the northern parcel. The site is now considered to have a capacity of 1,800 homes.
Infrastructure cannot cope with amount of growth proposed / infrastructure not given adequate consideration in the draft LP / Infrastructure at capacity now	The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure to support the planned development which is expected to place extra pressure on existing infrastructure, or to need new or improved infrastructure. The IDP will be updated as further detail on supporting infrastructure

Issue	Guildford Borough Council Response
	is available. Developer contributions and other funding sources will be used to ensure that key infrastructure is delivered when it is needed, including at the planning application stage.
Impact of additional traffic / congestion / narrow road / road safety / A3	The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Transport Strategy and IDP may therefore be updated to include these. As planning applications are considered for the sites identified in the new Local Plan, additional transport schemes to address site access and other localised issues may be secured.
Impact on pedestrian safety	<p>The site will be designed so that there are safe pedestrian connections within the site to the various facilities provided and outside of the site to connect into existing pedestrian footways and footpaths using the main pedestrian desire lines to the adjacent external facilities and communities.</p> <p>The identification of the pedestrian desire lines and the detailed design of pedestrian routes will be undertaken as part of the planning application for the site, but there are not considered to be any fundamental constraints that would prevent the site from having safe pedestrian facilities to serve the future demands for pedestrians.</p>
Impact on parking	Car parking provision within the site and the impact of overspill car parking is covered by Policy I3 “Sustainable transport for new developments”.
Impact on medical facilities Impact on education services /schools Impact on community facilities	<p>The site will provide a local centre with a range of uses including a GP surgery, community space, a local convenience store, premises for eating and drinking out, takeaways, and other local services needed to serve the development. Formal and informal open space will be required.</p> <p>The site will provide a 2-form entry Primary School to provide for needs arising from the proposed housing on the site.</p>
Flood risk/drainage	The site is located in flood zone 1 (low risk)
Impact on utilities	Water supply and wastewater network will require upgrading in order to support the proposed development.
Impact on air pollution Impact on noise pollution	This will be considered as part of the planning application process with appropriate mitigation if required.

Issue	Guildford Borough Council Response
Public transport inadequate Site too far from town/ isolated	The site could assist in the delivery of a new railway station at Guildford West (Park Barn). The site could also provide the western route section of the Sustainable Movement Corridor and make a necessary and proportionate contribution to delivering the western route section on the Local Road Network.
Loss of Green Belt / green space / fulfils purposes of GB No exceptional circumstances Create urban sprawl	These comments have been responded to in the table for Appendix C: Evidence Base
No evidence to substantiate plans	We consider the evidence base upon which the Local Plan is based to be robust and proportionate.
LCA not considered in GBCS	This comment has been responded to in the table for Appendix C: Evidence Base
Concern about harm to AONB / AGLV / landscape Visual impact / impact on views Beautiful area	We have re-appraised all sites and consider that the southern part of the site is sensitive in both landscape and Green Belt terms. For this reason the Proposed Submission Local Plan excludes this part, save for the site access road, which is now proposed to run alongside the existing Down Place access with a new all-movements traffic signal junction with the A31.
Loss of wildlife / corridor/ biodiversity	The impact on biodiversity and opportunities for enhancement will be considered as part of the detailed masterplanning.
Impact on TBH SPA	Bespoke SANG will be provided by the site owner (see Infrastructure Delivery Plan).
Impact on character of area/ of town	At detailed masterplanning stage, the site should provide positive benefit in terms of landscape and townscape character and local distinctiveness and will have regard to the identified landscape character areas.
Impact on ancient woodland	This designation is protected under the NPPF and any proposals will need to be in accordance with this policy.
Loss of recreational area Loss of public footpaths across the land / amenity land	The proposal will include new SANG which will improve the recreational value of this area. At detailed design stage, consideration will be given to the incorporation of existing footpaths within the scheme layout.
Loss of high grade agricultural land	The land is primarily moderate (classification 3b) agricultural land, with an area towards the south of good agricultural land (classification 3a), and a very small area of very good agricultural land (classification 2) on the western side. The loss of agricultural land has been considered through the Sustainability Appraisal.
Focus development on brownfield areas needing regeneration	Brownfield land is at the top of our spatial hierarchy however there is insufficient land to meet our objectively assessed housing needs.
Impact on other areas of the borough: Wood Street Village, Fairlands, Park Barn, Onslow Village	We do not consider that the harm associated with the development significantly and demonstrably outweighs the benefits, as required by the NPPF.
GBC have not explored any joined-up approaches to providing employment land	In October 2014 we published our new Employment Land Needs Assessment

Issue	Guildford Borough Council Response
across the region	(ELNA). This considered employment forecasts and trends across the Property Market Area (PMA)/Functional Economic Market Area (FEMA) which includes Woking and Waverley boroughs.
University accommodation: <ul style="list-style-type: none"> • More students need to live on campus • Concern about impact of students on the town • Development should provide student accommodation only • Recognise contribution of the University to local economy, but it should not be allowed to develop like this • University should build on its surface car parks • Where will the University expand in future if this land is built on? 	Please refer to the responses in Policy H1 Homes for all. We understand that the university is within the top 5% in the UK for provision of accommodation on campus and the University currently has over 5000 student bedspaces at its various sites. The wording has retained the expectation that 60% of the University of Surrey eligible student population (full time equivalent) is to be provided on campus. It is not within the remit of planning to restrict the number of students living off campus.
University planning permissions: <ul style="list-style-type: none"> • Undertaking to use Manor Park were not implemented • University not kept its promises from previous permissions • Requests for information about outstanding PP at uni / uni shouldn't be able to develop more until built out current PP 	Please refer to the responses in Policy H1 Homes for all. The University of Surrey continues to build student accommodation on its Manor Park campus and there are currently two pending planning applications for further student accommodation blocks.
University other: <ul style="list-style-type: none"> • University could provide affordable homes (but only as a target, subject to viability) • University should provide more distance-learning opportunities 	The University are not required to provide affordable housing under their extant outline planning permission at Manor Park. We understand that the University of Surrey does provide a wide variety of learning opportunities.
Local, Regional, and National importance of the Surrey Research Park needs to be recognised (and room to expand it)	The Proposed Submission Local Plan: strategy and sites now includes an additional policy specifically on the Surrey Research Park and the planned expansion of it.
Consider accessing from Wood Street/ Access to site is contentious	Surrey County Council has reviewed the access strategy for this site.
Beechcroft Drive off of the A3 is not a safely sustainable junction	Highways England is considering proposals to close Beechcroft Drive as part of their interim small improvements for the A3. However, the closure of Beechcroft Drive is not considered to be required for the development of this site.
Create a tunnel for the A3 to create greater unification	Comment noted. The Government's Road Investment Strategy (March 2015) requires Highways England to develop a scheme for the A3 Guildford, to improve the A3 in Guildford from the A320 to the Hogs Back junction with the A31, with associated safety improvements. The A3 Guildford scheme is subject to feasibility study and then progression

Issue	Guildford Borough Council Response
	through Highways England's Project Control Framework. As a result, the scheme could either be the widening of the existing A3 carriageways or a tunnel option. See Policy I2: "Supporting the Department for Transport's Road Investment Strategy".
Will enable better access to the hospital from the west via the Research Park	Comment noted.
Support idea for a PRT to serve as a major link between East and West Guildford	<p>Comment noted.</p> <p>The Sustainable Movement Corridor is included in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'. The Sustainable Movement Corridor will provide a priority pathway through the urban area of Guildford for buses, pedestrians and cyclists, linking areas of the urban area.</p>
Create a Local Green Space between Beech Croft Drive and Manor Copse	See Policy 19 Green and Blue Infrastructure.
Support the idea to make the field opposite Beechcroft Drive a local green space	
Concern about the overloaded and inadequate B3000 rail bridge	Network Rail proposes to replace the Compton Road Bridge in due course. There would be benefits in widening the bridge.
Assist hospital, research park and university	Comment noted.
The development offers a good opportunity for residential and associated uses (as a strategic site)	Comment noted.
Trust University will work with environmentally conscious developers	We are not able to control this however any developer of the site would need to develop the site in accordance with the planning permission and conditions that are granted together with Building Control standards.
Support rail station proposal	Comment noted.
The site is not suitable for all B2 and B8 uses, which would not be acceptable or compatible uses in relation to the nature and type of high technology and research activities that take place on the existing Surrey Research Park and the proposed extension of this activity at Blackwell Farm. A B1 use class is appropriate.	The Proposed Submission Local Plan: strategy and sites allocates this land for B1(a) and B1(b) and B1(c) use.
Deliverability not known because so many unanswered questions	We need to be able to demonstrate at Examination that our Local Plan and the sites within it are deliverable. We consider that there is sufficient evidence to conclude that this site could be realistically delivered during the plan period.
Economic Land Assessment appears to be flawed, optimistic forecasting that could cost us our Green Belt	In October 2014 we published our new Employment Land Needs Assessment (ELNA). This considered employment forecasts and trends across the Property Market Area (PMA)/Functional Economic Market Area (FEMA) which includes Woking and Waverley boroughs. As part of the analysis an average of three

Issue	Guildford Borough Council Response
	forecasts of employment were taken and consultants AECOM translated this into floorspace needed over the plan period using recent trends. Taking a mean average of the three forecast means the projection cannot be considered to be optimistic.
Object against a new park & ride proposed for the development	The Proposed Submission Local Plan: strategy and sites no longer includes a park and ride scheme as part of this site allocation.
The development proposed is not sustainable	The sustainability merits of this site and the plan as a whole are assessed as part of the Sustainability Appraisal process.
Concern about travellers in the area	The NPPF says we should create sustainable, inclusive and mixed communities, and that we should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community. In accordance with Planning Policy for Traveller Sites, the Local Plan identifies sufficient land to meet the need for Traveller pitches over the plan period. There are many Travellers living in the borough, and the Council is committed to planning for decent and sufficient accommodation for all.
Such a large development will increase crime levels	Detailed design of the development can help minimise opportunities for crime through Secure by Design Principles. There are likely to be contributions required towards policing.
No guarantee that the property will be bought by local people	The objectively assessed housing need takes account of both migration and demographic change in accordance with the NPPF.
Existing ancient woodland and AONB defensible boundary	The proposed boundary in the Proposed Submission Local Plan: strategy and sites is also a defensible boundary.
Should provide additional employment opportunities to Park Barn area	The Proposed Submission Local Plan: strategy and sites now includes an additional policy specifically on the Surrey Research Park and the planned expansion of it. It is proposed that the additional 10/11 ha expansion will provide approx 35,000 sq m of new research and development and office (use class B1a and B1b) floorspace. This will provide more employment opportunities.
Should be used for substantial employment uses in this plan and the next	The Proposed Submission Local Plan: strategy and sites now includes an additional policy specifically on the Surrey Research Park and the planned expansion of it. It is proposed that the additional 10/11 ha expansion will provide approx 35,000 sq m of new research and development and office (use class B1a and B1b) floorspace.
Development must be limited in height	This will be considered at detailed design stage.

61 Land north of Keens Lane, Guildford

Issue	Guildford Borough Council Response
Object to proposal	Comment noted
Supportive	Comment noted
Support care home but not housing	We are required to seek to meet all needs, including different forms of housing.
Support proportion of affordable housing	Comment noted
Support subject to Keens Lane being improved	This is not considered to be a fundamental constraint considering the level of additional traffic flows likely to be generated from the site proposal. The detailed impact of additional traffic on Keens Lane and adjacent junction(s) will be assessed in a Transport Assessment prepared as part of the planning application for this site. If the assessment concludes that improvements are required to Keens Lane then the applicant would be required to fund them.
Number of homes for this site too high	The number of homes is appropriate to the size of the site and ensures that we make efficient use of land.
Site should be extended to include all of PDA not within 400m of SPA	Majority of the GBCS PDA within 400m of SPA. The uses appropriate within this area are not needed as the need is being met elsewhere on more appropriate sites. The site has been identified on the basis of defensible boundaries to deliver the homes and care home.
Issues and options: <ul style="list-style-type: none"> • Site not part of I&O consultation • Considered poor in I&O consultation 	Changes can occur between individual Regulation 18 versions of the Local Plan and Regulation 18 and the Proposed Submission Local Plan (Regulation 19).
Harm to green belt: <ul style="list-style-type: none"> • No exceptional circumstances identified • Harm/loss of Green Belt • Create urban sprawl / urbanisation 	These comments have been responded to in Appendix C: Evidence Base
Loss of green space / trees	At detailed design stage, consideration will be given to the retention of any significant trees or vegetation on site
Impact on infrastructure: <ul style="list-style-type: none"> • Infrastructure cannot cope with amount of growth proposed / infrastructure not given adequate consideration in the draft LP / Infrastructure at capacity now 	The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure to support the planned development which is expected to place extra pressure on existing infrastructure, or to need new or improved infrastructure. The IDP will be updated as further detail on supporting infrastructure is available. Developer contributions and other funding sources will be used to ensure that key infrastructure is delivered when it is needed, including at the planning application stage.

Issue	Guildford Borough Council Response
Impact of additional traffic / congestion / narrow road / road safety / A3	<p>The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'. Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Transport Strategy and IDP may therefore be updated to include these.</p> <p>As planning applications are considered for the sites identified in the new Local Plan, additional transport schemes to address site access and other localised issues may be secured.</p>
Impact on pedestrian safety	<p>The site will be designed so that there are safe pedestrian connections within the site to the various facilities provided and outside of the site to connect into existing pedestrian footways and footpaths using the main pedestrian desire lines to the adjacent external facilities and communities.</p> <p>The identification of the pedestrian desire lines and the detailed design of pedestrian routes will be undertaken as part of the planning application for the site, but there are not considered to be any fundamental constraints that would prevent the site from having safe pedestrian facilities to serve the future demands for pedestrians.</p>
Impact on parking	Car parking provision within the site and the impact of overspill car parking is covered by Policy I3 "Sustainable transport for new developments".
Impact on infrastructure such as medical facilities, education services /schools and community facilities	The housing proposed on this site has been considered as part of preparing the IDP.
Flood risk/drainage	The site is located in flood zone 1 (low risk)
Impact on utilities	The wastewater network will require upgrading in order to support the proposed development.
Pollution: <ul style="list-style-type: none"> • Impact on air pollution • Impact on noise pollution 	This will be considered as part of the planning application process with appropriate mitigation if required.
Public transport inadequate	The site would need to provide new or enhanced cycle and pedestrian linkages where appropriate.

Issue	Guildford Borough Council Response
Impact on biodiversity including wildlife / wildlife corridor, ancient woodland and wetlands and TBH SPA / SSSI / common land	The Local Plan proposes suitable SANG that will provide mitigation for this site (see Infrastructure Delivery Schedule). Important biodiversity will need to be considered as part of the detailed design stage with appropriate mitigation.
Character: <ul style="list-style-type: none"> • Impact on character of area • Impact on landscape 	All development proposals should provide positive benefit in terms of landscape and townscape character and local distinctiveness and will have regard to the identified landscape character areas.
Amenity and character: <ul style="list-style-type: none"> • Impact on existing properties • Impact on quality of life / community spirit • Impact rights of way • Impact on listed buildings • Contamination 	It is considered that this could be satisfactorily addressed and mitigated at detailed design stage.
Loss of agricultural land	The loss of agricultural land has been considered through the Sustainability Appraisal.
Affordable housing not affordable	In accordance with Local Plan policy, a proportion of the site will be delivered as affordable housing.
No environmental impact assessment NE set out criteria for care home in 400m	An Appropriate Assessment will be required as part of the planning application. This will include details of how the car parking will be controlled to prevent additional recreational access to the SPA and how this will be enforced, and how the layout will be designed to prevent access to the SPA. Dwellings must not be proposed on the portion of the site that falls within 400m of the SPA.
Disproportionate amount of development in Worplesdon	Our spatial strategy is based on sustainability considerations and our spatial hierarchy rather a proportionate growth approach.
Support P&R with designated bus lanes	Comment noted. The Sustainable Movement Corridor: North scheme is included in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'. The Sustainable Movement Corridor will provide a priority pathway through the urban area of Guildford for buses, pedestrians and cyclists, linking areas of the urban area.
PDL first / plenty PDL	Brownfield land is at the top of our spatial hierarchy however there is insufficient land to meet our objectively assessed housing needs.
Question high provision of affordable housing	The West Surrey SHMA identifies a high level of affordable housing need.
Care home provision:	The SHMA has identified a need for 242 care or residential bedspaces and 1,334

Issue	Guildford Borough Council Response
<ul style="list-style-type: none"> • Do not need care home • Close to an existing care home 	specialist homes for older people over the plan period. Policy H1 reflects this.
Likely to lead to closure of the riding school	We do not consider that the harm associated with the development significantly and demonstrably outweighs the benefits, as required by the NPPF.
Propose burial ground here	This is considered to be suitable and available for housing development. An different site has been found to be most suitable for a new burial ground, as these have very specific requirement.
Blackwell is preferable	The Sustainability Appraisal has considered the sustainability merits of each site.

62 Land at Liddington Hall

Issue	Guildford Borough Council Response
<p>Generally supportive</p> <p>Supportive of: Evidence Base, land used for educational purposes, planned and controlled expansion in Green Belt</p>	Our spatial strategy and site allocations have been considered through the Sustainability Appraisal and this site no longer accords with the proposed spatial strategy in the Local Plan. The site was identified in the Green Belt and Countryside Study but is located within high sensitivity Green Belt.
<p>Objections to/ comments on proposal:</p> <ul style="list-style-type: none"> • Number of homes for this site too high • Harm/loss of green belt • No exceptional circumstances identified • Loss of green space/trees • Site contaminated • Site been rejected before • Site was given to Merrist Wood for educational purposes so should be used for just that if developed • Site not sustainable- poorly located • Infrastructure cannot cope with amount of growth proposed / infrastructure not given adequate consideration in the draft LP • Impact of additional traffic / congestion / narrow road / road safety • Impact on pedestrian safety • Impact on parking • Impact on medical facilities 	No longer applicable as this site is no longer included as a site allocation in the Proposed Submission Local Plan: strategy and sites.

<ul style="list-style-type: none"> • Impact on education services /schools • Flood risk/drainage • Impact on utilities • Impact on air pollution • Impact on noise pollution • Public transport inadequate • Impact on community facilities • Infrastructure at capacity now • Impact on wildlife / wildlife corridor • Impact on ancient woodland and wetlands • Impact on character of area • Impact on landscape / views • Impact on existing properties • Impact on TBH SPA / SSSI / common land • Impact on quality of life / community / recreation (Fairlands Angling Society use pond) • Impact rights of way • Contains a number of public rights of way • Create urban sprawl / urbanisation • Loss of agricultural land • Object to inclusion of traveller accommodation • Object to inclusion of retirement home • PDL first / plenty PDL • Why build mostly in Northern Guildford? More development in other areas 	
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63 Land north of Slyfield industrial estate

Issue	Guildford Borough Council Response
Generally supportive (subject to infrastructure improvements)	Our spatial strategy and site allocations have been considered through the Sustainability Appraisal and this site no longer accords with the proposed spatial strategy in the Local Plan. The site was not identified in the Green Belt and Countryside Study and is located within high sensitivity Green Belt.
Concerns/objections: <ul style="list-style-type: none"> • Objection to proposal 	No longer applicable as this site is no longer included as a site allocation in the Proposed Submission Local Plan: strategy and sites.

- Infrastructure cannot cope with amount of growth proposed / infrastructure not given adequate consideration in the draft LP
- Impact of additional traffic / congestion / narrow road / road safety / A3
- Impact on pedestrian safety
- Impact on parking
- Impact on medical facilities
- Impact on education services /schools
- Flood risk/drainage
- Impact on utilities
- Impact on air pollution
- Impact on noise and light pollution
- Public transport inadequate
- Impact on community facilities
- Infrastructure at capacity now
- Impact on wildlife
- Impact on character of area
- Loss of Green Belt
- No exceptional circumstances identified
- Urban sprawl
- Visual impact
- Adverse impact on Jacobs well
- SARP already subject to development proposals
- No need for industrial uses
- Greater need for high tech industries
- The copse between the site and Jacobs Well should be preserved.
Footpath could be improved
- Clay Lane link road – floods
- Clay Lane link road – increase congestion in other places
- Impact on TBH SPA
- Strip between Jacobs Well and Slyfield should be bunded woodland

64 Land at Gunners Farm and Bullens Hill Farm

Issue	Guildford Borough Council Response
<p>Support:</p> <ul style="list-style-type: none"> • Support proposal • Support (subject to infrastructure provision) • Community football ground much needed • Most towns of this size would have a ground for a town football club, Guildford doesn't • Benefit young people • Important facility to support sport in Guildford • Accessible location • Good community facility /needs to be for all community • Enable the club to progress 	<p>Site is not available for this use.</p>
<p>Objections and concerns:</p> <ul style="list-style-type: none"> • Object to proposal • Infrastructure cannot cope with amount of growth proposed / infrastructure not given adequate consideration in the draft LP • Impact of additional traffic / congestion / narrow road / road safety / A3 • Impact on pedestrian safety • Impact on parking • Impact on medical facilities • Impact on education services /schools • Flood risk/drainage • Impact on utilities • Impact on air pollution • Impact on noise and light pollution • Public transport inadequate • Impact on community facilities • Infrastructure at capacity now • Not accessible by public transport • Impact on visual amenity • Impact on wildlife / nature • Impact on woodland 	<p>No longer applicable as this site is no longer included as a site allocation in the Proposed Submission Local Plan: strategy and sites.</p>

Issue	Guildford Borough Council Response
<ul style="list-style-type: none"> • Impact on common / TBH SPA / SNCI /SSSI • No evidence to substantiate proposals • Harm to Green Belt / loss of green space/trees • Proposed use not needed • Provide use at Guildford sports park • Provide use at Stoke Park • Provide/better develop Spectrum • Rivalry between the two teams, may not be suitable • Propose sharing with Woking FC • Should also cater for live music, festivals etc • Should be used for housing instead • NE re car parking and 400m DLPSA/4194 	

65 Land north of Salt Box Road

Issue	Guildford Borough Council Response
Support for site: <ul style="list-style-type: none"> • Support • Support new secondary school but concerned about this site • School needs to be provided somewhere 	Not well placed to serve the main areas of planned housing development. Also Surrey County Council has concerns about pedestrian access to the site and local road congestion. Also some potential biodiversity concerns. Not suitable for a secondary school.
Oppose	The Proposed Submission Local Plan: strategy and sites proposes that this site is allocated for a burial ground.
Late additions to plan / not in I&O	The site is identified in the Green Belt and Countryside Study and is therefore a reasonable site option.
Infrastructure concerns: <ul style="list-style-type: none"> • Infrastructure cannot cope with amount of growth proposed / infrastructure not given adequate consideration in the draft LP/ Infrastructure at capacity now • No consideration for need for primary school in local area 	The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure to support the planned development which is expected to place extra pressure on existing infrastructure, or to need new or improved infrastructure. The IDP will be updated as further detail on supporting infrastructure is available. Developer contributions and other funding sources will be used to ensure that key infrastructure is delivered when it is needed, including at the planning application stage.
Transport infrastructure:	The Guildford Borough Transport Strategy and the transport sections of the

Issue	Guildford Borough Council Response
<ul style="list-style-type: none"> Impact of additional traffic / congestion / narrow road / road safety / A3 Constrained by railway bridge Dangerous road / crossing 	<p>Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'. Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Transport Strategy and IDP may therefore be updated to include these.</p> <p>As planning applications are considered for the sites identified in the new Local Plan, additional transport schemes to address site access and other localised issues may be secured.</p>
<p>Pedestrian infrastructure:</p> <ul style="list-style-type: none"> Impact on pedestrian / cyclist safety No pavements or street lights 	<p>The site can be accessed by walking and cycling from the south via Grange Road and Cumberland Road. There are also off-road cycling routes to the north of the site. A crossing facility for pedestrians and cyclists will be incorporated in the site access junction. Salt Box Road does not have a continuous footway. In view of the low level of visitors likely to a burial ground, this is not considered to be an issue.</p>
<p>Impact on parking</p>	<p>A small off-street car park will be required. It will be strictly restricted to genuine burial ground visitors only, being enforced by staff. The car park will need to have sufficient parking spaces to enable visitors to attend a burial service without overspill car parking occurring onto Salt Box Road.</p>
<p>Impact on medical facilities</p>	<p>No longer applicable as site is now being proposed for a burial ground</p>
<p>Impact on education services /schools</p>	<p>No longer applicable as site is now being proposed for a burial ground</p>
<p>Flood risk:</p> <ul style="list-style-type: none"> Flood risk/drainage/ groundwater Flooding under bridge 	<p>The site is at low risk of fluvial flooding (flood zone 1), nor suffering from surface water flooding. This is a very important consideration for a new burial ground, as potential for ground water contamination must be ruled out.</p> <p>A ground water assessment has been completed.</p>
<p>Impact on utilities</p>	<p>No longer applicable as site is now being proposed for a burial ground</p>
<p>Impact on air pollution</p>	<p>No longer applicable as site is now being proposed for a burial ground</p>
<p>Impact on noise and light pollution</p>	<p>No longer applicable as site is now being proposed for a burial ground</p>
<p>Accessibility and public transport:</p> <ul style="list-style-type: none"> Public transport inadequate Not accessible by public transport 	<p>There are a number of bus services that pass close to the site on Grange Road including services 26, 27 and 538. Other services that are further away but within a reasonable walk distance are on A322 (services 28 and 91) and A320 (3,538, 34</p>

Issue	Guildford Borough Council Response
<ul style="list-style-type: none"> • Far from other housing • Site not connected to community 	<p>and 35).</p> <p>The closest railway station is Worplesdon to the north of the site on the Woking to Guildford line. The route to the site by walking and cycling is along unlit roads or off-road paths and it is likely that most visitors who chose to visit the site by rail will use Guildford Station as the pedestrian and cycle network is better developed. There are also bus services from Guildford town centre to bus stops relatively close to the site.</p>
Impact on community facilities	No longer applicable as site is now being proposed for a burial ground
Site not big enough	No longer applicable as site is now being proposed for a burial ground
Considerable transport improvements would be needed to support development	<p>Access to the site could be achieved from where Grange Road meets Salt Box Road. The Highways Authority has requested a signalised junction. The site is located adjacent to Salt Box Road which connects with A320 to the east and A322 to the west. The site is reasonably well connected to the Strategic Road Network with three junctions with the A3 to the south providing access to A322, A320 and Clay Lane.</p>
<p>Character concerns:</p> <ul style="list-style-type: none"> • Impact on (visual) amenity • Impact on landscape • Close to listed building • Impact on character of area 	Use as a burial ground will not have an adverse impact on the character of the area or surrounding landscape
<p>Biodiversity concerns:</p> <ul style="list-style-type: none"> • Impact on wildlife • Impact on woodland • Impact on common / TBH SPA / SNCI /SSSI / local nature reserve • Fire risk on SPA 	<p>An Appropriate Assessment will be required as part of the planning application. This will include details of how the car park will be controlled to be limited to visitors to the burial ground, prohibiting parking by the general public and how this will be enforced (staffed), and how the layout will be designed to prevent access to the SPA.</p> <p>Ecological surveying will be undertaken at the appropriate times of year. Any tree planting and landscaping will be with native species.</p> <p>The site is within 400m of the SPA and is surrounded by SSSI. It is also adjacent to a Site of Nature Conservation Importance (SNCI). Access to the SPA will be designed out, and the car park will be strictly for use by visitors to the burial ground, and prevent use by others, including visitors to the SPA land.</p>
No evidence to substantiate proposals	The need for further burial ground provision over the plan period has been

Issue	Guildford Borough Council Response
	<p>considered, and potential sites outside of the Green Belt on which to deliver a new burial ground. No such suitable deliverable sites have been found.</p> <p>The engineering operations required to construct a new road access to the site would be appropriate in the Green Belt, and the construction of appropriate facilities for cemeteries is also appropriate development in Green Belt, provided it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it.</p> <p>The proposed facilities are likely to include toilets, tool shed, welfare facilities, and an office. Chapel facilities may not be needed, as the church service is usually held first, with only close family and friends attending the cemetery afterwards.</p>
Loss of green space / trees	Use as a burial ground will give access to the site to currently private land. The proposed use is beneficial for biodiversity.
<p>Harm to green belt:</p> <ul style="list-style-type: none"> • No exceptional circumstances identified • Urban sprawl • Harm / loss of Green Belt 	These comments have been responded to in the table for Policy 10
<p>Education:</p> <ul style="list-style-type: none"> • Do not need school • Expand/ invest in existing schools • Was SCC consulted before site identified? • Who would deliver the school? Academy / free school? • Site within catchment of another secondary school (Christ college?) • Site on edge of catchment area and should be in centre • School should be provided as part on enlarged Blackwell Farm / strategic site • Alternative – Pond Meadow • Alternative – Merrow with station • School should be near other houses 	No longer applicable as site is now being proposed for a burial ground

Planning for sites – new settlement

66 - Land at the Former Wisley Airfield

Issue	Guildford Borough Council Response
New settlement better option if homes are needed / if all facilities are provided / Site needs to be a self-sufficient community.	Comment noted
Wisley Airfield is a brownfield site – derelict for several years.	Comment noted.
Should be on smaller scale.	In order to maximise sustainability benefits the site needs to be of a critical mass that it is order to sustain the relevant services and facilities.
Green Belt should be protected / important countryside.	These comments have been responded to in the table for policy 10.
No exceptional circumstances / unmet housing need does not count.	These comments have been responded to in the table for policy 10.
Land serves important Green Belt function / prevents sprawl of London.	The land parcel within which this site sites has been assessed to score 2 out of the four Green Belt purposes.
Proposals contrary to NPPF.	The NPPF requires that we seek to meet our objectively assessed needs where consistent with the policies in the NPPF.
SHMA is flawed – figure too high.	These comments have been responded to in the table for Appendix C: Evidence Base.
Site not suitable because density/ scale too high for site/area.	The density of the masterplan will need to respond to the surrounding context in terms of heritage assets and landscape character.
Site not suitable because plan might be too expensive to be viable.	The NPPF requires that Local Plans are supported by a Viability Study to ensure that the scale of obligations and policy burdens required by the plan do not threaten the ability of sites to be developed viably. The plan must be deliverable.
Site not suitable because need new access onto A3 / access on Strategic Road Network.	The primary access to the site allocation will be via the A3 Ockham interchange, which is likely to require signalisation to provide additional capacity and to cater for pedestrians and cyclists.
Development-related traffic will exacerbate a traffic bottleneck at Ockham Interchange roundabout.	
Site not suitable because plans do not include access to the Ockham Park roundabout /do not include land.	See above. The site allocation abuts highway land at the A3 Ockham interchange. Therefore the land required to provide the primary vehicular access to the site is within either the control of the site allocation owner(s) or the highway authority.
Site not suitable because: <ul style="list-style-type: none"> • People will need to use cars to access services/ car dependent community/ employment / limited public transport – roads narrow/ weight limits • Roads already congested / narrow (surrounding lanes/ A3/ M25/ Send/ Ripley/ Ockham/ Ockham Road North/ Ockham Lane/ Plough Lane/ Forest Road/ Old Lane/ Effingham Common Road/ Newark Lane/ Howard Road/ Effingham Junction). 	Policy A35 of the 'Proposed Submission Local Plan: strategy and sites' sets out various transport requirements related to the site. The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed

Issue	Guildford Borough Council Response
	<p>Submission Local Plan: strategy and sites'. This includes various transport requirements related to the site.</p> <p>As planning applications are considered for the sites identified in the new Local Plan, additional transport schemes to address site access and other localised issues may be secured.</p>
<p>Site not suitable because commuter trains are already at capacity.</p>	<p>Network Rail's Wessex Route Study (August 2015) proposes a strategy which will address the challenge of accommodating projections for growth in demand for rail services to 2043, including demands arising and impacting on rail services in Guildford borough. A significant increase in rail capacity serving Guildford borough, primarily delivered through increases in the frequency of rail services, is anticipated in the period to 2043.</p> <p>The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'. This includes several schemes that will increase rail capacity in Guildford borough including NR12, NR2, NR3, NR4, NR5 and NR6.</p>
<p>Site not suitable because of limited car parking at nearby railway stations</p>	<p>Policy A35 of the 'Proposed Submission Local Plan: strategy and sites' sets out a requirement for a significant bus network to serve the site and key destinations including Effingham Junction and Horsley railway stations to be provided and secured in perpetuity to ensure that residents and visitors have a sustainable transport option for access to the site.</p> <p>The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'. Scheme BT3 will realise the significant bus network described above.</p>
<p>Site not suitable because roads used by cyclists and horse riders – increase risk of accidents</p>	<p>Policy A35 of the 'Proposed Submission Local Plan: strategy and sites' sets out a requirement for an off site cycle network to key destinations to a level that would be attractive and safe for the average cyclist.</p> <p>The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed</p>

Issue	Guildford Borough Council Response
	<p>Submission Local Plan: strategy and sites'. Scheme AM3 will realise the off site cycle network described above.</p> <p>At the plan-making stage, suggested risks to horse riders are not considered to be a fundamental reason for not including the site as an allocation. Nevertheless, it is a potential consideration for a Transport Assessment. If improvements are required to mitigate an increased risk of collision, then the developer(s) of the site would be expected to fund these.</p>
<p>Site not suitable because of insufficient supporting infrastructure/ no retail provision on site will be on site to make it sustainable</p>	<p>The site is being allocated for a number of uses to ensure that a number of services will be available on site. This includes retail, a local centre, education, employment and so on.</p>
<p>Site not suitable because of strain on existing infrastructure/services – schools/GPs/sports clubs</p>	<p>The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure to support the planned development which is expected to place extra pressure on existing infrastructure, or to need new or improved infrastructure. The IDP will be updated as further detail on supporting infrastructure is available. Developer contributions and other funding sources will be used to ensure that key infrastructure is delivered when it is needed, including at the planning application stage.</p>
<p>Site not suitable because it cannot provide safe walking/cycling routes from site</p>	<p>Policy A35 of the 'Proposed Submission Local Plan: strategy and sites' sets out a requirement for an off site cycle network to key destinations to a level that would be attractive and safe for the average cyclist.</p> <p>The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'. Scheme AM3 will realise the off site cycle network described above.</p> <p>It is anticipated that these routes will also be shared by pedestrians.</p>
<p>Site not suitable because of:</p> <ul style="list-style-type: none"> • Impact of In Vessel Composter / site not shown or taken account of in land take – would reduce size of development and SANG to a level that would be insufficient /IVC still needed as no other sites identified (SWP policy WD2 identifies part of the FWA as a site for waste management development. • Policy DC1 safeguards 16.98 ha of the FWA site for such development). 	<p>Although currently allocated in Surrey Waste Plan 2008, the new site owner has advised that, unlike the previous owner, it would not make the site available for waste use. This use could therefore only be achieved by Surrey County Council using its Compulsory Purchase (CPO) powers.</p>
<p>Site not suitable because of previous difficulties digging up runway / very deep.</p>	<p>It is not considered that this will impact upon deliverability of the site.</p>
<p>Site not suitable because the runway has blended into the landscape in the process of time – therefore should be excluded from the definition of previously developed.</p>	<p>The NPPF includes within the definition of previously developed land associated fixed surface infrastructure. As set out in the Inspector's report to the In vessel</p>

Issue	Guildford Borough Council Response
	composter application, the runway constitutes previously developed land.
Site not suitable because insufficient land is available for a sustainable new settlement / smaller than originally quoted /not in accordance with GBCS.	Additional land is now available and will be included in the 'Proposed Submission Local Plan: strategy and sites'. The Green Belt boundary identified in the Local Plan is in accordance with the GBCS. The GBCS identified that a minimum of 1,800 homes is required to help ensure the site is sustainable.
Site not suitable because of impact on local and surrounding residents / Ockham/ surrounding villages.	It is considered that this level of development could be delivered without giving rise to unacceptable building relationships or privacy concerns and that these could be satisfactorily addressed and mitigated at detailed design stage. Disturbance during construction phase are temporary and are capable of mitigation to some degree.
Site is not suitable because of: <ul style="list-style-type: none"> • impact access between the 9 hamlets of Ockham to each other and to the common • Impact on well used PROWs. 	The development is unlikely to propose the stopping up of any rights of way, some may require diverting but this will be determined at detailed design stage. SANG is being proposed to mitigate the impact recreational pressure caused by the development on the SPA (common).
Site is not suitable because of increased opportunities for crime.	Detailed design of the development can help minimise opportunities for crime through Secure by Design Principles. If appropriate, there may be contributions required towards policing.
Site is not suitable because of safety/functioning of Ockham Beacon and uncertainty in relation to the extent to which development could be accommodated in the eastern part of the site.	The VOR is expected to be removed by National Air Traffic Control (NATS) and may not need to be relocated. The DME may be retained at an appropriate location. Until the Beacon is removed, the VOR/ DME Safeguarding Plan will be used in respect of proposed building heights.
Site is not suitable because of impact on environment / rural character / conservation area/ listed buildings / RHS Wisley.	The eastern most point of the Ockham Conservation Area is adjacent to the southern-most point of the site. There is also a listed building on the eastern boundary. The setting of both will need to be considered as part of the masterplanning process.
Site is not suitable because of : <ul style="list-style-type: none"> • impact on wildlife / SNCI /SSSI • Impact on SPA – too close to it/ issues with proposed SANG (too small/close to SPA)/ SANG delivery standard of 12-16ha/1000 population is brought forward, and the SANG criteria are met in full / SANG likely to be incompatible with SNCI. 	A Phase 1 Habitat Survey has been undertaken in 2013. To the north of the site lies the wooded area of Ockham and Wisley Common, which is designated as an SSSI and as part of the Thames Basin SPA. The western part is an adopted SNCI whilst a larger area is proposed as new SNCI (subject to a re-survey). A number of proposed ecological enhancements are proposed through the emerging masterplan. Bespoke SANG will be provided by the site owners (see Infrastructure Delivery Plan).
Site is not suitable because the runway covers small part of site (less than 20%)/ should have been reverted back to countryside /should not justify Green Belt removal	The presence of an element of brownfield land is only one factor in allocating this site. It does not in itself justify removal from the Green Belt. We cannot find any legal basis upon which to require that the land is returned to greenfield.
Site is not suitable because of: <ul style="list-style-type: none"> • Air/ noise/ light pollution • Air quality – impact on RHS Wisley and SPA 	<p>The site may require further noise and air quality assessment, due to its proximity to the A3, with appropriate mitigation.</p> <p>Air quality has been considered as part of the planning application. No concern is raised regarding Nitrogen deposition and NOx concentrations. Further assessment</p>

Issue	Guildford Borough Council Response
	will be carried out to consider potential for acid deposition.
Site is not suitable because of loss of agricultural land	The site does contain a proportion of Best and Most Versatile agricultural land. This has been considered through the Sustainability Appraisal.
Site is not suitable because of existing sewage/drainage/flooding issues	This has been considered through the Level 2 SFRA and flood risk sequential test.
Site is not suitable because of impact on views from AONB	The site is sufficient distance from the AONB for it not to give rise to any material impact on the nationally protected landscape. The development is unlikely to result in a material increase in traffic on lanes in the AONB such as would be detrimental to tranquil enjoyment of the AONB. Accordingly, the development is not considered to materially impact on the landscape character or setting of the Surrey Hills AONB.
Site is not suitable because it is long and thin which prevents walkable neighbourhoods	The 'Proposed Submission Local Plan: strategy and sites' includes an extension to the site to the south. This widens the middle portion of the site which will help create a more sustainable design.
Site is not appropriate because proposed Bla, Blb, B2 and B8 floorspace is inappropriate in this rural location	The NPPF states that "For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site." The employment floorspace proposed would contribute to the sustainability of the development and is an appropriate quantum to serve the proposed new settlement.
Site is not appropriate because it does not have defensible boundaries at south	The southern Green Belt boundary follows that recommended in the GBCS.
Site is not appropriate because it is contrary to LCA	The LCA does not imply the need to 'freeze' the landscape. Instead it will guide the direction of any future change or evolution through development or management, by indicating sensitivities that should be considered, and providing the most positive opportunities for change and minimising negative impact.
Site is not suitable because of issues with site promoters landscape assessment	We consider the landscape assessment is fit for purpose. We acknowledge that there will be some impact on the landscape however we do not consider that this significantly and demonstrably outweighs the benefits of providing homes here.
Site is not suitable because of potential archaeological potential	Further archaeological work will be undertaken. This would include an archaeological evaluation and a trial trenching exercise, which will aim to establish rapidly what Archaeological Assets are and may be present. This would then inform either further study work or the detailed layout of the site to ensure that remains are not damaged.
Site is not suitable as it should be designated as a heritage asset	There is no evidence to justify this.
Traveller sites should not be included in the Green Belt	The NPPF says, "To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community" (page 13). The 'Proposed Submission Local Plan: strategy and sites' proposes to amend Green Belt boundaries to meet the need for housing (C3), employment land, and traveller accommodation.
Insufficient evidence base to support proposals	We consider the evidence base upon which the Local Plan is based to be robust

Issue	Guildford Borough Council Response
	and proportionate.
Issues with transport evidence base in the Plan	These comments have been responded to in the table for Appendix B: Infrastructure Schedule of the 'Draft Guildford borough Local Plan: strategy and sites'.
The duty to cooperate paper has not been published /nor has schedule mentioned in MR	A Duty to Cooperate Topic Paper is going to be published alongside the 'Proposed Submission Local Plan: strategy and sites'.
Must explore whether neighbours could help meet housing need	The NPPF states that we should maximise opportunities to meet our housing need. There is already unmet housing need within our Housing Market Area.
Infrastructure evidence: <ul style="list-style-type: none"> • There is no Infrastructure Delivery Plan • There has been no work on the cumulative effect of all of the policies on infrastructure 	An Infrastructure Delivery Plan is going to be published alongside the 'Proposed Submission Local Plan: strategy and sites'.
SA and subsequent publication lacks transparency	The final Sustainability Appraisal is going to be published alongside the 'Proposed Submission Local Plan: strategy and sites'.
The Plan not include the use of the latest ONS figures	These comments have been responded to in the table for Appendix C: Evidence Base.
No up to date ELA published / figures and sites in draft Plan different to ELA	These comments have been responded to in the table for Appendix C: Evidence Base.
The plan fails to reflect Government policy to reduce international migration which account for well in excess of 50% of the projected population growth in the borough.	These comments have been responded to in the table for Appendix C: Evidence Base.
Site 66 is not referenced enough in the Local Plan – not enough details about housing locations	The 'Proposed Submission Local Plan: strategy and sites' includes a borough overview map to help readers to understand where the site allocations are located. The Site Allocation itself will set out what will be provided on each site and what considerations/opportunities are present.
Maps and information are complicated to read/understand	The 'Proposed Submission Local Plan: strategy and sites' will include a series of topic papers to help readers understand the plan.
No clear evidence in the LDF evidence base to demonstrate that sustainable delivery of the proposed new settlement will be viable	The Viability Study considers each strategic site.
The Habitat Regulation Assessment is inadequate	These comments have been responded to in the table for Appendix C: Evidence Base.
Not an adequate SA or SEA	These comments have been responded to in the table for Appendix C: Evidence Base.
The methodology of the assessment of the function of Green Belt land in the GBCS report is flawed	These comments have been responded to in the table for Appendix C: Evidence Base.
No evidence to suggest that Natural England has been consulted to establish if the proposed SANG is even acceptable	Bespoke SANG will be provided by the site owners (see Infrastructure Delivery Plan).
Spatial strategy – growth around villages more sustainable than new settlement	A new settlement is able to deliver significantly more supporting infrastructure than smaller sites around villages. It is for this reason that a new settlement appears higher in our spatial hierarchy. The 'Proposed Submission Local Plan: strategy and

Issue	Guildford Borough Council Response
	sites' includes a mixture of both options.
Not listening to local opinion	This Consultation statement sets out how we have addressed consultation comments and where we have not made changes, explains why.
Not enough jobs in area – residents will have to commute	The 'Proposed Submission Local Plan: strategy and sites' seeks to meet our employment needs. We have sought to balance the number of homes and jobs across the borough.
Homes would not be affordable	A proportion of the site will be affordable housing in line with our policy on affordable homes.
Use infilling to meet housing need	Infilling alone would not meet our objectively assessed housing needs.
Expand existing settlements by a small percentage so no one place will be overwhelmed / Housing should be spread throughout the Borough	Our spatial strategy is based on sustainability considerations and our spatial hierarchy rather a proportionate growth approach.
High rise flats are not in keeping with the area	At detailed design stage, careful consideration will be required in relation to the mix of homes on site and the heights of buildings.
Young couples and families will not want to live in the countryside	There is a housing need across the borough and homes in this location are likely to be attractive to the market.
Free school or academy would be required to deliver school – no indication whether any willing partner	We continue to work with Surrey County Council's school commissioning and infrastructure officers to secure delivery partners for the new schools.
Housing should be in keeping with style of existing settlement	At detailed design stage, careful consideration will be required in relation to the design of development to ensure that it responds to local character.
Focus development on Brownfield sites / urban area	These spatial options are at the top of our hierarchy.
Likely to be other opportunities for sustainable development in Horsley and other larger villages	The 'Proposed Submission Local Plan: strategy and sites' includes sites around the villages including Horsley.
Students should be housed on campus to free up housing in Guildford	Many students live in accommodation on the University of Surrey campus, and further student accommodation continues to be built at the Manor Park campus.
Site should be used for employment/ light industrial use instead	The site is allocated for an element of employment.
Site should include secondary school	The 'Proposed Submission Local Plan: strategy and sites' now includes provision of two 4-form entry secondary schools, and one 7 FE secondary school.
Should include a train station	This site would include new and improved cycle links and bus services to connect the site with surrounding rail stations.
The SANG should not be removed from Green Belt	The Green Belt boundary is in accordance with the GBCS. This includes land proposed to be SANG. This land lies within the 0-400m buffer of the SPA and is therefore unable to accommodate any housing development. The SANG would also be secured in perpetuity.
Waste allocation harmful to RHS	Approximately 17ha of land in the north west of the proposed strategic allocation site is allocated for waste use in Surrey Waste Plan 2008, and has extant planning permission for an in-vessel composter, which was found not to have a harmful impact on RHS.
Oppose closing Old Lane traffic travelling from the A3 to the Black Swan leaving the road as a one-way route / will affect Ockham Bites Café	A road closure can only be implemented with a Traffic Regulation Order promoted under the Highways Act 1980. Surrey County Council as local highway authority are

Issue	Guildford Borough Council Response
	responsible for promoting Orders. Any proposed Order needs to be advertised and any objections to a closure will need to be considered by Surrey County Council. If the owners of Ockham Bites Café were concerned about the impact on their business they would be able to object to the Order and this would be taken into account when a decision was made.
Drainage Infrastructure strategy should be required from developers	The site promoters have been discussions with utility providers, which have provided quotes for bringing utility services in the area up to the standard needed.
Part of the site allocation is identified for the development of an aggregates recycling facility / Planning permission in place for a waste management facility / Still in need of the waste management facility	<p>Although currently allocated in Surrey Waste Plan 2008, the new site owner has advised that, unlike the previous owner, it would not make the site available for waste use. This use could therefore only be achieved by Surrey County Council using its Compulsory Purchase (CPO) powers.</p> <p>The site is also identified in Surrey Aggregates recycling joint DPD 2013 as a potential site for a aggregate recycling facility.</p>
<p>SCC should provide written consent that all five public footpaths will be closed</p> <p>The Rights of Way network should be increased and enhanced as part of any development.</p>	Surrey County Council are involved in discussions with the site promoters and the treatment of the existing Rights of Way will need to be agreed prior to planning approval being granted.
<p>Highways requirements should include:</p> <ul style="list-style-type: none"> • New access at Ockham Interchange • Closure of Elm Lane • Part closure of Old Lane • Closure of Ockham Lane east of Ockham village • Closure of through route to Cobham on Plough Lane between Chilbrook Road and Pointers Road • Closure of east to west movement on Guileshill Lane • Ripley / Send / Pyrford Common improvements • A3 Southbound slips at Ockham Interchange. 	<p>Policy A35 of the 'Proposed Submission Local Plan: strategy and sites' sets out various highway requirements related to the site.</p> <p>The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'. This includes various highway requirements related to the site.</p> <p>As planning applications are considered for the sites identified in the new Local Plan, additional transport schemes to address site access and other localised issues may be secured.</p>
Pegasus report is prejudiced and incorrect	These comments have been responded to in the table for Appendix C: Evidence Base

Planning for sites – around villages

67 - Tannery House and land adjacent to Tannery Lane

Issue	Guildford Borough Council Response
Support for proposal	Our spatial strategy and site allocations have been considered through the

Issue	Guildford Borough Council Response
	Sustainability Appraisal and this site no longer accords with the proposed spatial strategy in the Local Plan. The site was not identified in the Green Belt and Countryside Study and is located within high sensitivity Green Belt.
Green Belt serves an important function – must be protected / prevents sprawl/ protects countryside	No longer applicable as this site is not included as a site allocation in the ‘Proposed Submission Local Plan: strategy and sites’.
No exceptional circumstances demonstrated	
Green Belt assessed as high sensitivity	
Existing planning permission for 63 dwellings – not clear how this fits with allocation for business and industrial	
Moorings for boats already being built	
<p>Site not suitable because:</p> <ul style="list-style-type: none"> • Tannery Lane narrow and not suitable for HGV/vans • Tannery Lane not suitable for cyclists/walkers • Local Road network already congested /narrow (A247/B2215/Papercourt Lane/ Polesdon Lane) • Access at Send Road not suitable • Traffic lights at junction would worsen congestion – already traffic lights short distance away • Lack of demand for units here / units for rent • Business units elsewhere being converted into residential • Impact on Papercourt Marshes Wildlife area and Papercourt SSSI / River Wey navigation • Flooding issues • Impact on wildlife • Impact on environment/ rural character / amenity • Services cant cope (schools/GPs) • Impact on infrastructure • Noise and air pollution • Impact on SPA • Poor public transport • Should not use agricultural land • Parking issues will worsen • Scale too large 	
Alternative uses suggested: Info centres, coffee shop, library	
Not greenfield land	
Suggest amendment to proposed GB boundary	

68 - Land at Hornhatch Farm

Issue	Guildford Borough Council Response
Support limited provision in villages to help sustain services Support site	Our spatial strategy and site allocations have been considered through the Sustainability Appraisal and this site no longer accords with the proposed spatial strategy in the Local Plan. The site was identified in the Green Belt and Countryside Study but is located within high sensitivity Green Belt.
If given permission the proposal: <ul style="list-style-type: none"> • should include a roundabout at Rice's Corner (previously promised) • must protect grass verges and old Oak trees adjacent to New Road • set back development • style in keeping with area / includes greenery • protects Horn Hatch Farm • vehicle access onto B2128 with pedestrian and cycle access only onto A248 • re-opening East Shalford Lane from Hornhatch Lane to through traffic • Green Belt serves an important function – must be protected / prevents sprawl/ protects countryside 	No longer applicable as this site is not included as a site allocation in the 'Proposed Submission Local Plan: strategy and sites'.
No exceptional circumstances to review boundaries	
Oppose	
Site not suitable because: <ul style="list-style-type: none"> • Transport infrastructure can't cope with increased traffic – nearby single track lanes, existing busy roads, parked cars on road • New Road only entrance and exit and carries a lot of through traffic / congested • Impact of services (schools, medical) • Too far from train stations • A248 and B2128 junction dangerous / congested • Spoil views from AONB (North Downs Way/ St Marta's church / Chantries) • Prominent location • Need to protect industrial and landscape heritage of Tillingbourne Valley • Lead to sprawl along New Road and decrease gap between Womersh and Shalford • Air and noise pollution 	
Significant development in villages remote from urban centres may encourage commuting	
Need to consider cross boundary impacts with Waverley	

69 - Howard of Effingham School and land

Issue	Guildford Borough Council Response
<p>New school supported Opportunity to reduce congestion along the Lower Road Current school not fit for purpose – relocation and re-provision necessary</p>	<p>The existing school site is 8FE.</p> <p>The land is parcel D10 in the GBCS, zoned as “sensitive” red Green Belt land, and there are therefore preferable sites to this on which to accommodate future school needs in this part of the borough. Not suitable for a secondary school.</p> <p>A planning application was refused in March 2016 for a replacement school (10 FE) on adjacent land, with some 450 homes on the current school sites and on adjacent land to help fund it. This “enabling” housing would have required one FE, leaving on additional FE to provide additional capacity for children in planned future housing. This would be insufficient to contribute materially to future education need in the area. Due to need for this “enabling” housing, the site is not available for significant additional capacity to serve future planned housing.</p>
<p>Infilling appropriate on Browns Field – only used for car parking Support limited provision in villages to help sustain services Support enlarged site Green Belt should be protected/ No exceptional circumstances to review boundaries/unmet housing need does not count</p>	<p>Our spatial strategy and site allocations have been considered through the Sustainability Appraisal and this site no longer accords with the proposed spatial strategy in the Local Plan. The site was identified in the Green Belt and Countryside Study but is located within high sensitivity Green Belt.</p>
<p>No Very Special Circumstances, no evidence of need</p> <ul style="list-style-type: none"> • GBCS flawed 	<p>No longer applicable as this site is not included as a site allocation in the Proposed Submission Local Plan: strategy and sites.</p>
<p>Contrary to NPPF as meets some/all purposes of GB fails to define a defensible green belt boundary to the north–east</p>	
<p>New homes should be smaller homes – 1,2,3 beds</p>	
<p>Rebuild / modernise school on current site / without the housing</p>	
<p>Sites should be assess without influence of school proposals</p>	
<p>Scale of enabling housing should be reduced</p>	
<p>School states they only have 24% of land required (via the Standard used nationally - BB98). Calculate this as 106%</p>	
<p>School condition not bad / many buildings built recently / classroom sizes adequate</p>	
<p>Good school, good teaching, good reputation</p>	
<p>Site not identified in GBCS</p>	
<p>Each site should have been assessed separately</p>	
<p>Site not suitable because:</p> <ul style="list-style-type: none"> • Surrounding roads already congested / narrow (Browns Lane/ The Street/Effingham Common Road/Lower Road/A246) / no input from 	

Issue	Guildford Borough Council Response
<p>SCC / parking issues</p> <ul style="list-style-type: none"> • Lack of adequate footpaths • Access off narrow and congested road / inadequate • Crossing The street at Home Farm already dangerous • Services can't cope / No mention of supporting infrastructure / not in IDP in first 5 years • GPs already full • Flooding issues – clay soil, natural springs, severe flooding winter 2013/14 / drainage / surface water not been considered • The chalk aquifer under Effingham is classed as a major aquifer • Biodiversity on site (skylarks, mammals) / Effingham Lodge Farm is a wildlife corridor • Impact of light pollution on bats • Impact on character of area (Effingham and Little Bookham) / openness /amenity / conservation area • Remnants of ancient woodland nearby / Thornet Wood SSSI / Bookham Common SSSI closer than assessed in SA – EIA required • SPA • Archaeology (browns field) • Too far from train station / limited public transport/ car parks full • Brown's Field is important recreational use / open space / setting for village (browns field) – should not be developed • Pollution • Impact of cumulative development in area • Impact on KGV – school will no longer contribute to the Trust as will have own playing fields – maintenance issue • Loss of agricultural land • Land is owned by Trust – should not be used for developer profits • Increase crime • Contrary to LCA • School will be 3 storeys high – will be visible • Density proposed too high • Too many schools in Effingham area / expansion not needed for catchment (assessment by SCC) / not strategic matter • new secondary school in Cobham • demand from pupils outside catchment • KGV fields can be used to overcome lack of outdoor space • Local school all over subscribed (Raleigh/HoE) • Still require an additional school in the area / consider alternative school 	<p style="text-align: center; opacity: 0.5; font-size: 48px; transform: rotate(-30deg);">Draft</p>

Issue	Guildford Borough Council Response
sites to serve entire conurbation of Effingham/Bookham area <ul style="list-style-type: none"> • Additional places would be taken by new homes not locals • Increased pressure for HofE to expand again in future 	
Must ensure safe crossing for school children on Lower Road	
Too many pupils/staff already park on Lower road	
no incentive to promote sustainable forms of transport	
must provide sufficient car parking / cars should park on old nursery site	
Building on British Legion car park will lead to increased parking on Lower Road	
Scale of growth not proportionate to village / as per settlement hierarchy	
Smaller schools perform better than larger schools	
Not enough information regarding density and design	
Combined development in MVDC would merge Bookham and Effingham / Green Belt purpose	
Impact of additional site at Leewood Park / Preston Cross	
Brownfield first	
Will Berkeley fund school in entirety/	
GBC promised not to include site in DLP in meeting with parish council (31 March) but instead considered on its own merits	
Wish to produce a neighbourhood plan for the area	
Significant development in villages remote from urban centres may encourage commuting	
Support Mole Valley DC in adopting existing private road and adding bridleway access to school	
Green Belt boundary would not have indefensible boundaries apart from trees which are likely to be lost / blown down/ seasonal	
A number of inset boundaries do not follow defensible features (eg middle of a field, fencelines, woodlands)	
Part of site is actually within 5km of SPA	
SANG needed	
Cross boundary concerns (Mole valley) not yet resolved, particularly need to discuss infrastructure and GB further / impact on Bookham	
Won't provide 45% affordable housing	
Green houses do not make site PDL, temporary use that would revert to agriculture	
Demand for school places because of recent development, like this proposed / new homes will take additional school places	
Size of site not correct	
As shown in GBCS, limited harm to GB / suitable, available and deliverable site	
VSC exist	

Issue	Guildford Borough Council Response
TW - concerns regarding Wastewater Services	
Includes SCC owned highway verge as part of site – question availability	
Why enabling development needed here but not a proposed West Clandon school?	
Other Green Belt benefits (reduce air pollution, floodings	
SA flawed	

70 - Land to the north of West Horsley

Issue	Comment
Support limited provision in villages to help sustain services	Comment noted
Suitable available viable and deliverable site	Comment noted
Mix of sizes, tenures, types for mixed community	This will be delivered through our Homes for all policy
Green Belt should be protected / important countryside/ No exceptional circumstances to review boundaries	These comments have been responded to in the table for Policy 10
Site not suitable because roads already congested / narrow	The existing access road that will serve the site will need to be improved to accommodate the additional traffic movements from the development proposals. There is land available adjacent to the access road to enable improvements to be made. The IDP/transport strategy sets out the transport schemes required on the local and strategic road network to mitigate the impact of additional traffic on the highway network.
Site not suitable because services can't cope	The IDP sets out the level of infrastructure provision that is necessary in order to support planned growth in this area.
Site not suitable because schools are full	The IDP sets out the level of infrastructure provision that is necessary in order to support planned growth in this area.
Site not suitable because too far from village amenities	Distance to services and facilities is one of a number of factors that were assessed as part of the Sustainability Appraisal.
Site not suitable because within 5km of SPA	The proposed dwellings require the provision of Suitable Alternative Natural Greenspace (SANG). The Local Plan proposes suitable SANG that will provide mitigation for this site (see Infrastructure Delivery Plan).
Site not suitable because Impact on existing residents	There is a new policy in the 'Proposed Submission Local Plan: strategy and sites' which requires that new development in inset villages has no unacceptable effect on the amenity of surrounding occupants
Site not suitable because no justification to make Green Lane access point	The principal vehicular and pedestrian access to the site would be achieved using the access road which has a junction with Ockham Road North. There is the potential to provide a pedestrian/cycle link and even provide vehicular access to serve a number of dwellings from Green Lane.
Site not suitable because of flooding issues	The site has been subject to a Level 2 Strategic Flood Risk Assessment (SFRA) and flood risk sequential test.
Site not suitable because it is too far from train station/car park at capacity	The site is a mile from Horsley rail station.
Site not suitable because development will urbanise the village	Any proposals will need to demonstrate at planning application stage that they are

	of high quality design and in keeping with the character of the surrounding area. In response to this concern the 'Proposed Submission Local Plan: strategy and sites' includes a new policy on development in urban areas and inset villages.
No evidence that SANG mitigates harm on SPA	The SANG approach has been established by the Joint Strategic Partnership Board and is overseen by Natural England. Natural England monitors the approach to ensure that it is effective.
Too many sites in West Horsley	Our spatial strategy is based on sustainability considerations and our spatial hierarchy rather a proportionate growth approach.
Brownfield first	Brownfield land is at the top of our spatial hierarchy however there is insufficient land to meet our objectively assessed housing needs.
There are more sustainable and less constrained sites, e.g H8-C Significant development in villages remote from urban centres may encourage commuting	As part of the Sustainability Appraisal we have considered all reasonable site and spatial options.
Raleigh school should be replaced on this site	The current owner has promoted it for housing development. This site could still come forward for a redeveloped Raleigh school, it would not be in the Green Belt.

71 - Land to the west of West Horsley

Issue	Guildford Borough Council Response
Support limited provision in villages to help sustain services	Comment noted
Support proposal	Comment noted
Site is suitable, available, viable and deliverable	Comment noted
SANG available	Comment noted
Trees/woodland must be retained	This will be considered at detailed design stage
Mix of sizes, tenures, types for mixed community	This will be delivered through our Homes for all policy
Green Belt should be protected / important countryside / no exceptional circumstances Urbanisation of the village / ruin countryside	These comments have been responded to in the table for Policy 10
Site not suitable because roads already congested / narrow (East Lane/Long Reach)	The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Transport Strategy and IDP may therefore be updated to include these. As planning applications are considered for the sites identified in the new Local Plan, additional transport schemes to address site access and other localised issues may be secured.
Site not suitable because no footpaths	There are footpaths on East Lane to the south of the site that provide suitable access for pedestrians from the site to the main facilities in East Horsley.
Site not suitable because no street lighting	This will be considered at detailed design stage.
Site not suitable because: <ul style="list-style-type: none"> West Horsley specifically lacks services (one shop, no post office, a primary 	The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure to support the planned development which is expected to

Issue	Guildford Borough Council Response
<p>school, a shared medical facility, limited bus service)</p> <ul style="list-style-type: none"> • Services can't cope (schools/GPs/broadband) 	<p>place extra pressure on existing infrastructure, or to need new or improved infrastructure. The IDP will be updated as further detail on supporting infrastructure is available. Developer contributions and other funding sources will be used to ensure that key infrastructure is delivered when it is needed, including at the planning application stage.</p>
<p>Site not suitable because of loss of agricultural land</p>	<p>This has been considered through the Sustainability Appraisal.</p>
<p>Site not suitable because it is too far from village amenities</p>	<p>Distance to services and facilities is one of a number of factors that were assessed as part of the Sustainability Appraisal.</p>
<p>Site not suitable because of flooding issues including roads (including roads Silkmore Lane, Green Lane, Ripley Lane, The Street, Ockham Road North, Guilehill Lane)</p>	<p>The site is at low risk of fluvial flooding (flood zone 1). The site is within a hot spot area identified in the Guildford Surface Water Management Plan (the Horsley's hotspot). Any proposed development in this area should have regard to findings and recommendations of this study.</p>
<p>Site not suitable because:</p> <ul style="list-style-type: none"> • Ben's Wood too small for all Horsley sites and already used • Ben's Wood is a natural habitat for protected species 	<p>Bens Wood is not intended to provide mitigation for all the Horsley sites. The Infrastructure Development Plan that accompanies the pre submission Local Plan Strategy and Sites identifies it as a bespoke SANG for two developments. The capacity of the SANG is adequate for these two developments.</p>
<p>Site not suitable because of impact on grade II listed farmhouse</p>	<p>The setting of the building would need to be preserved as part of any new development.</p>
<p>Site not suitable because it is too far from train station/car park at capacity</p>	<p>The site is located approximately one mile from the train station at Horsley. This is considered to be a reasonable walk or cycle distance.</p>
<p>Site not suitable because of impact on character/amenity</p>	<p>Any proposals will need to demonstrate at planning application stage that they are of high quality design and in keeping with the character of the surrounding area. In response to this concern the Proposed Submission Local Plan includes a new policy on development in urban areas and inset villages.</p> <p>The Proposed Submission Local Plan now includes a policy which supersedes the former Local Plan 2003 R5 policy. This policy seeks to protect areas of open land within non-Green Belt areas that is of public value due to its amenity.</p>
<p>No evidence that SANG mitigates harm on SPA</p>	<p>The SANG approach has been established by the Joint Strategic Partnership Board and is overseen by Natural England. Natural England monitors the approach to ensure that it is effective.</p>
<p>SANG needed Within 5km of SPA</p>	<p>There is SANG available to avoid harm to the Thames Basin Heaths SPA.</p>
<p>Land used as parking by Horsley football club for annual tournament – loss could jeopardise club's future</p>	<p>This is by agreement with the landowner and therefore not a planning consideration.</p>
<p>Not proportionate to the size of the village</p>	<p>Our spatial strategy is based on sustainability considerations and our spatial hierarchy rather a proportionate growth approach.</p>
<p>Brownfield first</p>	<p>Brownfield land is at the top of our spatial hierarchy however there is insufficient land to meet our objectively assessed housing needs.</p>
<p>Nursery must be maintained/expanded if needed/development must respect use</p>	<p>The site includes a children's day nursery on site that is proposed to be retained.</p>

Issue	Guildford Borough Council Response
Significant development in villages remote from urban centres may encourage commuting	As part of the Sustainability Appraisal we have considered all reasonable site and spatial options.
Raleigh school should be replaced on this site	The current owner has promoted it for housing development. This site could still come forward for a redeveloped Raleigh school, it would not be in the Green Belt.

72 - Land near Horsley Railway Station

Issue	Guildford Borough Council Response
Support limited provision in villages to help sustain services	Comment noted
Suitable, available, viable and deliverable site	Comment noted
Mix of sizes, tenures, types for mixed community	This will be delivered through our Homes for all policy
Sustainable site close to train station and services	Comment noted
Should have fewer homes to reduce flood risk	The site will be masterplanned to take account of any flood risk whilst making efficient use of land.
Green Belt should be protected / important countryside No exceptional circumstances demonstrated Remove sense of openness	These comments have been responded to in the table for Policy 10
Site not suitable because: <ul style="list-style-type: none"> Poor access – pinch point in road with railway bridge and listed properties nearby/ limited sightlines - concern with traffic and pedestrian safety / height of bridge/congested Roads already congested / narrow Traffic already dangerous due to Glenesk School /2 primary schools 	<p>The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'. Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Transport Strategy and IDP may therefore be updated to include these. As planning applications are considered for the sites identified in the new Local Plan, additional transport schemes to address site access and other localised issues may be secured.</p> <p>Access to the site would be off Ockham Road North and would be achieved through the demolition of Chicane and Quintons residential properties.</p> <p>Ockham Road North is subject to a 30 mph speed limit in the vicinity of the site access. It is considered that suitable visibility splays can be provided and that Ockham Road North is suitable to accommodate the additional traffic flows from this site without having a detrimental impact on road safety for all road users.</p>
Site not suitable because: <ul style="list-style-type: none"> Flooding issues / site in flood zone 3/functional floodplain/ ditches and stream on site/clay / surface water flooding / topography/ geology EA flood maps done show seasonal stream, Lollsworth Stream 	The majority of the site is within flood zone 1 (low risk of fluvial flooding), however part of the site towards the eastern side is within flood zones 2 and 3 (medium and high risk of fluvial flooding). Further work is being undertaken by the site promoters, working towards a flood map challenge to the Environment Agency of

Issue	Guildford Borough Council Response
<ul style="list-style-type: none"> • Sewage issues after heavy rainfall • Ockham Road North/South often floods 	the extent of the flood zones. See the Level 2 SFRA and flood risk sequential test for more information.
Site not suitable because Infrastructure / services can't cope	The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure to support the planned development which is expected to place extra pressure on existing infrastructure, or to need new or improved infrastructure. The IDP will be updated as further detail on supporting infrastructure is available. Developer contributions and other funding sources will be used to ensure that key infrastructure is delivered when it is needed, including at the planning application stage.
Site not suitable because of narrow/limited footway	It is considered that the existing footway on Ockham Road North is of sufficient width to accommodate the additional pedestrian movements from this site.
Site not suitable because it is Within 5km of SPA	There is SANG available to avoid harm to the Thames Basin Heaths SPA.
Site not suitable because of impact on wildlife (Lollesworth Wood SNCI)	This will be considered at detailed design stage to ensure there is appropriate mitigation.
Site not suitable because of loss of agricultural land	This has been considered through the Sustainability Appraisal.
No evidence that SANG mitigates harm on SPA	The SANG approach has been established by the Joint Strategic Partnership Board and is overseen by Natural England. Natural England monitors the approach to ensure that it is effective.
Listed as West Horsley but Surrey parish map says East Horsley / More part of East Horsley / access is East Horsley	The 'Proposed Submission Local Plan: strategy and sites' refers to this site as East Horsley.
Merges East and West Horsley further	East Horsley and West Horsley (north) are already joined. It is considered that the sustainability benefits of this location in relation to the train station and other facilities outweighs any harm associated with further perceived merging.
Brownfield first	Brownfield land is at the top of our spatial hierarchy however there is insufficient land to meet our objectively assessed housing needs.
Urbanisation	Any proposals will need to demonstrate at planning application stage that they are of high quality design and in keeping with the character of the surrounding area. In response to this concern the Proposed Submission Local Plan includes a new policy on development in urban areas and inset villages.
Significant development in villages remote from urban centres may encourage commuting	As part of the Sustainability Appraisal we have considered all reasonable site and spatial options.

73 - Land to the west of West Horsley (south)

Issue	Guildford Borough Council Response
Suitable, available, viable and deliverable (propose minor amendment to boundary) Support limited provision in villages to help sustain services	Our spatial strategy and site allocations have been considered through the Sustainability Appraisal and this site no longer accords with the proposed spatial strategy in the Local Plan. The site was identified in the Green Belt and Countryside Study but is located within high sensitivity Green Belt.

Issue	Guildford Borough Council Response
Mix of sizes, tenures, types for mixed community	No longer applicable as this site is not included as a site allocation in the 'Proposed Submission Local Plan: strategy and sites'.
Green Belt should be protected / important countryside	
No exceptional circumstances demonstrated	
Site not suitable because: <ul style="list-style-type: none"> • Important amenity for village • Rural open character • Ripley Lane floods • flooding issues on site • sewage issues • Ripley Lane narrow • Services can't cope (schools/ doctors full) / services too far away • Surrounded by 10 listed building • Close to National Trust Hatchlands Park, Hatchlands House and Barnside Cottages, protected Oak trees, ancient woodland / contrary to Policy 12 • Impact on AONB • Impact of conservation area • Dangerous bend at The Street • Roads already congested / narrow • Within 5km of SPA • Loss of agricultural land • Protected biodiversity on site (Bats, Nightjar, Red Kite) • Too far from train station/car park at capacity/limited and non-viable bus service • No job opportunities nearby • Urbanisation • No evidence that SANG mitigates harm on SPA 	
Density indicated is too high for character of village / too many homes	
Brownfield first	
GBCS encroachment score changed in April version – no explanation	
GBCS scores it for access to a private school	
Significant development in villages remote from urban centres may encourage commuting	

74 – Burntcommon Warehouse

Issue	Guildford Borough Council Response
Site supported	Our spatial strategy and site allocations have been considered through the Sustainability Appraisal and this site no longer accords with the proposed spatial strategy in the Local Plan. The site was identified in the Green Belt and Countryside Study but is located within medium sensitivity Green Belt. We are capable of meeting our industrial need on the Garlick's Arch site which is also capable of delivering other significant infrastructure to support planned growth.
Infrastructure: <ul style="list-style-type: none"> • Must include supporting infrastructure • Need more retail and parking, parking too far away for old people and children • Services and facilities can't cope (doctors/education/sewage/drainage) • Impact on infrastructure 	The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure to support the planned development which is expected to place extra pressure on existing infrastructure, or to need new or improved infrastructure. The IDP will be updated as further detail on supporting infrastructure is available. Developer contributions and other funding sources will be used to ensure that key infrastructure is delivered when it is needed, including at the planning application stage.
Green Belt should be protected / important countryside No justification for GB release / housing figure too high GBCS subjective in boundaries The GBCS Sustainability Assessment Scoring is quite low and mostly for being close to an A-road	These comments have been responded to in the table for Policy 10
Lack of detail regarding use/allocation of site (sqm)	Comments no longer relevant as site is not included within the 'Proposed Submission Local Plan: strategy and sites'
No mention of height restrictions that will apply	
Site not suitable because it would merge Send Marsh/Burntcommon with Guildford/Woking when Gosden Hill is developed	
Site not suitable because of impact on wildlife (badgers)	
Site not suitable because of: <ul style="list-style-type: none"> • Too close to A3 for housing – pollution/amenity/safety issue • Serves as buffer with A3 	
Site not suitable because of transport infrastructure impact: <ul style="list-style-type: none"> • Roads already congested / narrow esp for HGV vehicles (Vicarage Lane/Potters Lane/ A247 / B2215 / Send Barns Lane/The Street/Send Road/Glandon Road/Ripley High Street/Wood Hill/Burntcommon roundabout) / by pass for A3 • No northbound access onto A3 – impact on local roads • Access roads / junction dangerous (Woodhill/Potter Lane) • Poor public transport links / walking links to services / cycle links / capacity on trains / parking at stations 	
Ancient footpath (Thatched Cottage to Highcotts Lane, West Clandon) must not be lost	
Site not suitable as should safeguard land for northbound slip onto A3 and	

Issue	Guildford Borough Council Response
southbound slip off A3 / need access off A3	
Site not suitable as Impact/noise/pollution from heavy goods vehicles	
Site not suitable because of Impact on character/ conservation area / environment /amenity	
Site not suitable because of: <ul style="list-style-type: none"> • Flooding issues • A3 slip road to London Road /Woodhill Culvert prone to flooding 	
Site not suitable because of impact on SPA	
Site not suitable because of Increased crime	
Site not suitable because of loss of agricultural land	
Additional industrial land not needed	
Scale of development not proportionate to village / no need in Send	
Existing sites should be used more effectively	
	Whilst we are seeking to make best use of existing sites, there nevertheless remains a need for industrial land. The Employment Land Needs Assessment (ELNA) highlights the limited potential for intensification on existing sites. There is not enough capacity to accommodate the identified need over the plan period.
Site could be considered brownfield	Comment noted
Site should be used an alternative to the Vision Engineering site / existing site in Send Marsh and Ripley	Vision Engineering site received planning permission in July 2014 (ref 13/P/02183). The Local Plan can not change current planning permissions which have been granted.
Site should be used as housing rather than commercial (greater need)	The site is providing both. Whilst the housing need is higher in relative terms, suitable and available sites for industrial uses is more limited.
Site should be used as Traveller accommodation	The site is not of a sufficient scale to trigger the policy threshold for providing traveller accommodation
Site should be used as Secondary school for eastern borough	This has been considered through the Land Availability Assessment.

75 – Land at Tannery Lane

Issue	Guildford Borough Council Response
Suitable, available, viable and deliverable Support limited provision in villages to help sustain services	Our spatial strategy and site allocations have been considered through the Sustainability Appraisal and this site no longer accords with the proposed spatial strategy in the Local Plan. The site was identified in the Green Belt and Countryside Study but is located within high sensitivity Green Belt. No longer applicable as this site is not included as a site allocation in the 'Proposed Submission Local Plan: strategy and sites'.
Village centre site could be suitable for affordable homes	
Marina should include public access to river	
Green Belt is identified as high sensitivity / Green Belt should be protected	
Object	
No justification for GB release / unmet need not exceptional circumstances	
Contrary to NPPF which seeks to protect Green Belts and intrinsic value of countryside	

Issue	Guildford Borough Council Response
<p>Housing figure too high</p> <p>Site not suitable because:</p> <ul style="list-style-type: none"> • Roads already congested / narrow (Tannery Lane/Newark Lane/Send Barns Lane/Send Road/Papercourt Lane/Polesdon Lane/Sandy Lane) (recent experience when Newark Bridge closed/SCC previously opposed additional traffic) esp traffic for Send Business Park • Borough wide road network inadequate • Difficult to cross Send Road • Cars parked at junction / restricted view – dangerous to exit / not suitable for traffic lights as already some down road • Limited footpath - dangerous for cyclists and pedestrians • Flooding issues • Contamination issues (Sand Pit, adj vineyard) • Knotweed (the vineyard/Clockbarn) • Impact on wildlife (cuckoos, sky larks, bats, deer, owls, kites, orchids, reed warblers, lapwings, frogs) • Impact on environment / rural character/ amenity • Limited opportunities to access public transport / use sustainable forms of transport • Services can't cope (schools, GPs, sewage) • Loss of high grade 2 agricultural land • Impact on conservation area managed by SWT / River Wey navigation (contrary to Policy 12) / Papercourt Marshes Wildlife area and Papercourt SSSI • Loss of privacy • Noise and air pollution • Impact on SPA • Coalescence with Old Woking/Riply • Increased crime/drug issues in car park • Loss of employment at nursery site • Inconsistent with findings of LCA • Land contains gravel from mining activities under 2—30 foot of clay • Part of the site covers a soakaway & cannot be developed 	
<p>Car park not suitable because:</p> <ul style="list-style-type: none"> • Not close to any shops • Dangerous for children to cross road to rec • Wrong side of road for shops/recreation • Lead to more congestion 	

Issue	Guildford Borough Council Response
<ul style="list-style-type: none"> • Not needed 	
Development not proportional to size of village/ not needed by Send / unsustainable in years 1-5	
Marina too far from village with poor access	
Existing planning permission for 66 dwellings in the area – should be taken account of	
Send already has a boating lake	
Significant development in villages remote from urban centres may encourage commuting	
Greatest population growth will be in urban areas and have rail links – should be focus for growth	
Growth across borough should be fairly distributed	
Brownfield sites should be used	
Concern that some work appears to have already begun on site (site cleared and utilities work)	

76 - Land to the east of Aldertons Farm

Issue	Guildford Borough Council Response
Support site – high housing need Support limited provision in villages to help sustain services	Our spatial strategy and site allocations have been considered through the Sustainability Appraisal and this site no longer accords with the proposed spatial strategy in the Local Plan. The site was identified in the Green Belt and Countryside Study but is located within medium sensitivity Green Belt.
Green Belt should be protected / important countryside	No longer applicable as this site is not included as a site allocation in the 'Proposed Submission Local Plan: strategy and sites'.
Exceptional circumstances not demonstrated	
Site not suitable because: <ul style="list-style-type: none"> • Roads already congested / narrow / bendy (Send Marsh Road (small bridge), Send Barns Lane/ Polesdon Lane/Mays Corner) • Pavements too narrow/poor quality (only on one side of the road) • Flooding issues • Impact on wildlife (deer, owls, kites, mandarin duck) • Important gap between Send Marsh and Send / GB purpose • Impact on environment/amenity / character of area • Use of agricultural land / pasture land • Should use brownfield land instead (nearby site Dansfield) • Impact on infrastructure • Reduces green and blue infrastructure • Scale of development not proportionate to village / not needed in village • Services cant cope (schools, GPs, sewage) • Poor public transport / not suitable for cycling 	

Issue	Guildford Borough Council Response
<ul style="list-style-type: none"> Noise and air pollution School land might be built on Impact on residents of Old Hall residential home Impact on SPA Lead to increased crime •Impact of density of home on nearby listed buildings (including Aldertons)/conservation area /low density of homes Alternative sites: Area behind 'Dane End' opposite 'Aldertons' Farm, adjacent to 'Ben Turner' development (Brown Field), Garlick's Arch Copse- on B2215 presently a 'shooting range' (Location is within Ripley Boundary), Hundreds of Hectares of Reclaimed Land in NW Send Significant development in villages remote from urban centres may encourage commuting 	<p style="text-align: center; opacity: 0.5; font-size: 48px; transform: rotate(-30deg);">Draft</p>
Affordable homes will be out of keeping with the area	
SANG can be released for housing in insufficient development at other sites	
Impact on house values	
Brownfield overlooked	
Suitable, available, viable and deliverable in 5 years	
NE - is 215m from Papercourt SSSI. The site is designated for its nesting and wintering birds and as such may be susceptible to recreational disturbance from increased residential development nearby. This allocation should ensure an assessment of impacts is carried out with regard to the SSSI and that appropriate mitigation is brought forward if necessary.	

77 - Land to the south of Clandon Station and north of Meadowlands

Issue	Guildford Borough Council Response
Support new school at Clandon	Highways, access and safety concerns raised by SCC and GBC. Also lack of suitable pedestrian and cycle infrastructure. Not suitable for a secondary school.
Object to 3 housing sites in West Clandon and building in East Clandon	No longer applicable as this site is not included as a site allocation in the 'Proposed Submission Local Plan; strategy and sites'.
Object to new secondary school in West Clandon	
Proposal does not meet NPPF requirement	
Support village remaining in GB	
Should include a 6 th form to relieve pressure off existing ones	
Site suitable because: <ul style="list-style-type: none"> Correct size Good transport links and rail station nearby New schools needed 	

Issue	Guildford Borough Council Response
<ul style="list-style-type: none"> • Site suitable for new homes 	<p style="font-size: 48px; opacity: 0.3; transform: rotate(-45deg); pointer-events: none;">Draft</p>
Green Belt should be protected / village fulfils GB purposes	
Removing Green Belt will encourage further development - Deliverability concerns in which case could be developed for housing	
Need based on too high a housing figure	
No exceptional circumstances demonstrated	
Question the way this proposal for the School in West Clandon was introduced - Site a late addition to plan / no one informed	
Insufficient evidence done to support site / site not visited	
Mitigation of issues on site will make the site too small / too expensive to deliver / not viable	
Detrimental to quality of life for existing residents	
Will increase urbanisation	
Site is not sustainable	
<p>Site not suitable because:</p> <ul style="list-style-type: none"> • Roads already congested / narrow /bends (The Street) • A247 fast road – not safe • Dangerous access / visibility poor • Impact of school on small village • Poor public transport – limited buses and train inaccessible from most places • Impact on environment / character/amenity • Impact on listed buildings / conservation area / heritage asset • Impact on wildlife • Narrow pavements and alternate sides of road – not safe • Limited parking off site / issues with dropping off of children • Flooding issues – water runoff, no natural drainage, cost of drainage • Not supported by SCC • Goes against findings of LCA – this kind of development should not be allowed in the villages • Lack of facilities/infrastructure in village • Sewage issues • Noise and air pollution • TPOs on site • Not many would come by train/ walk/ cycle/ majority would use car or bus • West Clandon changed from small village to medium village • No street lighting • No land either side of road available for improvements • Majority of children would be from outside the village / school should be located 	

Issue	Guildford Borough Council Response
<p>where children are – West Clandon doesn't need new school</p> <ul style="list-style-type: none"> • Site will not pass risk assessment • A risk assessment will have to be carried out for children with disabilities • Should be on Brownfield site 	<p style="text-align: center; font-size: 48px; opacity: 0.3; transform: rotate(-45deg); pointer-events: none;">Draft</p>
Should expand existing schools	
Schools should be located near park and walk	
Unclear on catchment area the school would need to serve	
Need would be met by Howard of Effingham expansion	
<p>Use other plots which are more suitable:</p> <ul style="list-style-type: none"> • Site 74 Burnt Common Warehouse • Land near St Bedes • Land lying to the East of the junction of the A247 and the A246 • Merrow/ Burpham • Gosden Hill Farm • Land at the back of the GP Surgery • Clandon Common, adjacent to railway line – will take problems away from the village centre • Wisley Airfield • E1 Clandon golf course • Proposals do not take local opinion into consideration 	
Existing house values will decrease	
School wouldn't be on line for 6 – 11 years however proposed local houses built in 1-5 years)	
Purchase a house on The Street for alternative access to school	
West Clandon is one village – not North and South	
Mistrust in GBC/ Key Leaders / Consultation process	
Clandon has already done its bit by means of development	
Access from main road instead of residential road	
GBC should produce a traffic plan between the A246 and the A3	
The site should have a Preliminary Ecological Assessment	

78 - Land to the east of White Lane

Issue	Guildford Borough Council Response
Support new housing in Ash Green (no flooding issues) Support site	Comment noted
Support limited provision in villages to help sustain services	Comment noted
Green Belt should be protected / important countryside	These comments have been responded to in the table for Policy 10
Site not suitable because: <ul style="list-style-type: none"> Village lacks services – shops/schools/health Services can't cope 	The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure to support the planned development which is expected to place extra pressure on existing infrastructure, or to need new or improved infrastructure. The IDP will be updated as further detail on supporting infrastructure is available. Developer contributions and other funding sources will be used to ensure that key infrastructure is delivered when it is needed, including at the planning application stage.
Site not suitable because roads already congested / narrow	The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Transport Strategy and IDP may therefore be updated to include these. As planning applications are considered for the sites identified in the new Local Plan, additional transport schemes to address site access and other localised issues may be secured.
Site not suitable because it is within 5km of SPA	The 'Proposed Submission Local Plan: strategy and sites' proposes suitable SANG that will provide mitigation for this site (see Infrastructure Delivery Plan).
Significant development in villages remote from urban centres may encourage commuting	As part of the Sustainability Appraisal we have considered all reasonable site and spatial options.
Density too high for the area – impact on character	Any proposals will need to demonstrate at planning application stage that they are of high quality design and in keeping with the character of the surrounding area. In response to this concern the Proposed Submission Local Plan includes a new policy on development in urban areas and inset villages.
No evidence that SANG mitigates harm on SPA	The SANG approach has been established by the Joint Strategic Partnership Board and is overseen by Natural England. Natural England monitors the approach to ensure that it is effective.

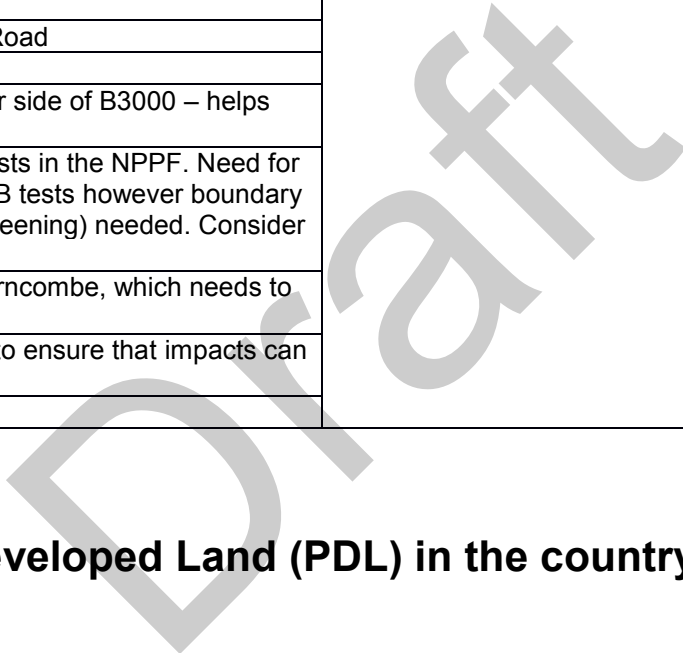
79 - Land to the south of Hazel Road

Issue	Guildford Borough Council Response
Support new housing in Ash Green (no flooding issues)	Comment noted
Support limited provision in villages to help sustain services	Comment noted
Should be protected / important countryside	These comments have been responded to Policy 10

Issue	Guildford Borough Council Response
Site not suitable because: <ul style="list-style-type: none"> • Village lacks services – shops/schools/health • Services can't cope 	The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure to support the planned development which is expected to place extra pressure on existing infrastructure, or to need new or improved infrastructure. The IDP will be updated as further detail on supporting infrastructure is available. Developer contributions and other funding sources will be used to ensure that key infrastructure is delivered when it is needed, including at the planning application stage.
Site not suitable because roads already congested / narrow	The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Transport Strategy and IDP may therefore be updated to include these. As planning applications are considered for the sites identified in the new Local Plan, additional transport schemes to address site access and other localised issues may be secured.
Site not suitable because it is within 5km of SPA	The 'Proposed Submission Local Plan: strategy and sites' proposes suitable SANG that will provide mitigation for this site (see Infrastructure Delivery Plan).
Significant development in villages remote from urban centres may encourage commuting	As part of the Sustainability Appraisal we have considered all reasonable site and spatial options.
Density too high for the area – impact on character	Any proposals will need to demonstrate at planning application stage that they are of high quality design and in keeping with the character of the surrounding area. In response to this concern the Proposed Submission Local Plan includes a new policy on development in urban areas and inset villages.
No evidence that SANG mitigates harm on SPA	The SANG approach has been established by the Joint Strategic Partnership Board and is overseen by Natural England. Natural England monitors the approach to ensure that it is effective.

80 - Land south of New Pond Road

Issue	Guildford Borough Council Response
Good site without significant impact on road network Suitable, available and deliverable within 5 years	Our spatial strategy and site allocations have been considered through the Sustainability Appraisal and this site no longer accords with the proposed spatial strategy in the Local Plan. The site was identified in the Green Belt and Countryside Study but is located within medium sensitivity Green Belt. Site is also within the AONB.
No exception circumstances demonstrated Green Belt should be protected / important countryside Fulfils Green belt purposes	No longer applicable as this site is not included as a site allocation in the 'Proposed Submission Local Plan: strategy and sites'.

Issue	Guildford Borough Council Response
Site not suitable because: <ul style="list-style-type: none"> • Roads already congested / narrow(B3000) • Services can't cope • Deliverability dependant upon other land in Waverley coming forward • Site is constrained • Site maintains separation between Guildford and Farncombe/ Godalming • Impact on environment/ amenity/rural character • Impact on woodland/hedgerows/ wildlife • Loss of agricultural land • Impact on landscape / in AONB / AGLV 	
Development must not spill onto other side of New Pond Road	
AONB less affected if lower density on that part of site	
Understand flooding issues likely to be addressed on other side of B3000 – helps deliver housing	
Major development in the AONB – need to consider the tests in the NPPF. Need for development and alternatives. Land unlikely to meet AONB tests however boundary review won't remove AONB. Environmental mitigation (screening) needed. Consider access off Furze Lane.	
Suggestion to include medical facility from Binscombe, Farncombe, which needs to relocate. Area of high need	
NE - We advise that a comprehensive LVIA is carried out to ensure that impacts can be avoided or mitigated in liaison with the AONB Unit.	
Suggest care home as part of development	

Planning for sites – Previously Developed Land (PDL) in the countryside

81 Broadford Business Park, Shalford

Issue	Guildford Borough Council Response
Object to proposed site allocation	Comment noted
Support more local businesses in the area	Comment noted
Support site remaining in employment use	The loss of employment floorspace is a consideration however new modern office buildings are best located in the town centre, where they are close to public transport and services.
Site not suitable because:	The Guildford Borough Transport Strategy and the transport sections of the

Issue	Guildford Borough Council Response
<ul style="list-style-type: none"> Highly congested road Increased traffic The number of proposed new homes in villages will encourage travelling by car 	<p>Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Transport Strategy and IDP may therefore be updated to include these. As planning applications are considered for the sites identified in the new Local Plan, additional transport schemes to address site access and other localised issues may be secured.</p>
<p>Site not suitable because:</p> <ul style="list-style-type: none"> Entrance/exit close to blind bend Poor access Narrow bridge across river (will the bridge be replaced?) 	<p>There is existing priority access for the current use. The bridge over the River Wey to the west is narrow but as Broadfield Road is an all-purpose road it should not prevent an intensification of use of the site. There are traffic management options for controlling traffic flows on the bridge, such as traffic signals shuttle working if it was deemed necessary to control vehicles passing each other on the bridge.</p>
<p>Site not suitable because of inadequate pedestrian access</p>	<p>The site should be designed so that there are safe pedestrian connections within the site to the various facilities provided and outside of the site to connect into existing pedestrian footways and footpaths using the main pedestrian desire lines to the adjacent external facilities and communities.</p> <p>The identification of the pedestrian desire lines and the detailed design of pedestrian routes will be undertaken as part of the planning application for the site, but there are not considered to be any fundamental constraints that would prevent the site from having safe pedestrian facilities to serve the future demands for pedestrians.</p>
<p>Site not suitable because of flood risk</p>	<p>The developable area of the site is located within Flood Zones 1 and 2 (low and medium risk of fluvial flooding). See the Level 2 SFRA and flood risk sequential test for more information.</p>
<p>Site not suitable because of increase pressure on local facilities</p>	<p>The IDP and the Local Plan infrastructure schedule set out the key infrastructure to support the planned development which is expected to place extra pressure on existing infrastructure, or to need new or improved infrastructure. The IDP will be updated as further detail on supporting infrastructure is available. Developer contributions and other funding sources will be used to ensure that key infrastructure is delivered when it is needed, including at the planning application stage.</p>
<p>Historic value:</p> <ul style="list-style-type: none"> Building has historic value Replacement of offices with houses should be in agreement with National Trust 	<p>The historic value of the building would be assessed as part of any application for re-development of the site.</p>
<p>Landscape:</p> <ul style="list-style-type: none"> The new homes should not occupy a larger footprint than the existing offices, or exceed their height 	<p>Landscape and character will be considered at detailed design stage</p>

Issue	Guildford Borough Council Response
<ul style="list-style-type: none"> Any new homes should be of high quality and design as site overlooks river and is visible from a distance In the Area of Great Landscape Value (AGLV) Development should not have adverse impact on tranquillity of river side location 	
This is a secondary potential additional area for further scrutiny with relation to the forthcoming Area of Outstanding Natural Beauty (AONB) boundary review.	This area is adjacent to a secondary potential additional area of Surrey Hills AONB. The site is already developed.
Oversight re: listing as strategic employment site and allocation for housing	The 'Proposed Submission Local Plan: strategy and sites' no longer includes it as a strategic employment site.
Concerns about water supply capability and wastewater services	Water supply and wastewater network will require upgrading in order to support the proposed development.
This allocation is adjacent to the Wey Meadows Sites of Special Scientific Interest (SSSI) and a local wildlife site. An assessment will need to be carried out to ensure that any impacts to the SSSI and local wildlife site can be avoided or mitigated.	This will be considered at detailed design stage to ensure there is appropriate mitigation.

82 Mount Browne

Issues	Guildford Borough Council Response
Object to proposed site allocation	Comment noted
Site not suitable because: <ul style="list-style-type: none"> Sandy Lane, Littleton Lane and Stakescorner Road / roads are not at all suitable for access The roads are narrow and dangerous Increase traffic/congestion Any increase in traffic will make access to existing properties dangerous Current workforce creates traffic congestion 	The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Transport Strategy and IDP may therefore be updated to include these. As planning applications are considered for the sites identified in the new Local Plan, additional transport schemes to address site access and other localised issues may be secured.
Site not suitable because of potential increase in crime as site away from routine patrols	Detailed design of the development can help minimise opportunities for crime through Secure by Design Principles. If appropriate, there may be contributions required towards policing.
Site not suitable because it is within 5km of the Thames Basin Heaths Special Protection Area (SPA), and therefore any redevelopment, especially for housing, is subject to EU/UK legislation (NPPF 119). The impact of development cannot be avoided with Suitable Alternative Natural Greenspace (SANGs) because there is no evidence base to support SANGs as required by NRM6 viii, NPPF 158 and 166.	The 'Proposed Submission Local Plan: strategy and sites' proposes suitable SANG that will provide mitigation for this site (see Infrastructure Delivery Plan). The SANG approach has been established by the Joint Strategic Partnership Board and is overseen by Natural England (NE). NE monitors the approach to ensure that it is effective.
Site not because of impact on the conservation area:	The setting of the conservation area would be taken into account during the

Issues	Guildford Borough Council Response
<ul style="list-style-type: none"> Impact on River Wey green corridor The redevelopment of this site could have a potentially major impact on the amenity of the River Wey and the setting of the River Wey Conservation Area, the AONB, the St Catherine's conservation area and the setting of the St Catherine's The setting of the site needs to be carefully protected 	assessment of any application for re-development of the site.
Light industrial/offices would be a better use of the site	In order to allocate a site it must be deliverable. The site is not available for employment uses.
Must be other preferable sites	The site allocations are informed by the Sustainability Appraisal, which assesses the sustainability merits of all sites.
Site should provide specialist housing	The site may provide an element of specialist housing, to be determined at planning application stage.
<p>Impact on AONB:</p> <ul style="list-style-type: none"> Development must be done sensitively Any development must take into consideration the Green Belt, AONB and AGLV This is an elevated site with extensive views to and from the AONB to the South. Building on the elevated site at Mount Browne would adversely affect the visual amenity of the entire valley as it would be visible for miles. Development should not be extended beyond built footprint because of AONB, conservation area, trees 	<p>All development proposals should provide positive benefit in terms of landscape and townscape character and local distinctiveness and will have regard to the identified landscape character areas.</p> <p>At detailed design stage, careful consideration will need to be given to its potential impact on the AONB and AGLV.</p>
<p>Impact on green belt:</p> <ul style="list-style-type: none"> No exceptional circumstances to justify removing land from the Green Belt The green belt in this area satisfies all five of the criteria and is especially valuable in maintaining the area of countryside between Guildford and Farncombe. 	These comments have been responded to in the table for Appendix C: Evidence Base
<p>Reasons for support:</p> <ul style="list-style-type: none"> Parts of the site are well concealed with mature trees which screen the buildings in such a way as to protect this rural landscape approach to Guildford It is PDL so sensible to redevelop 	Comments noted
Propose larger site area	We consider that, given the AONB, it would only be appropriate to redevelop that part of the site which is currently developed.
The allocation lies approximately 400m from the Wey Valley Meadows SSSI. A hydrological assessment will need to be undertaken to ensure that this allocation does not impact the water quality/resources of the SSSI.	This will be considered at detailed design stage to ensure there is appropriate mitigation.
Significant concerns regarding Water Supply Capability and Wastewater Services in relation to this site.	Water supply and wastewater network will require upgrading in order to support the proposed development.

83 Bisley Camp

Issue	Guildford Borough Council Response
Should be inset	This does not accord with our evidence base (GBCS).
This site is adjacent to the Ash to Brookwood Heaths SSSI, which is part of the Thames Basin Heaths SPA, and the Thursley, Ash, Pirbright & Chobham SAC. Natural England requires additional information about what is proposed on this site, on and above what exists already.	We have always proposed to retain this site as washed over by the Green Belt. Whilst it was included in the draft Local Plan as a site allocation, this was on the basis that there may be very special circumstances in the future for development here to support existing uses however this would need to be demonstrated at planning application stage. The 'Proposed Submission Local Plan: strategy and sites' no longer includes this site as an allocation. Any future proposals will be determined on its individual merits as part of a planning application.

84 Merrist Wood

Issue	Guildford Borough Council Response
Support proposed site allocation	Comment noted
Concern about recent planting of high hedges	This is not a matter for the Local Plan.
The college is a local employer and development within the current developed site should be supported subject to the usual planning system.	Comment noted
This allocation lies 400m from the SPA and SSSI, and partly within a local wildlife site. Natural England advises that further work is carried out to determine that recreational disturbance can be avoided prior to confirming this allocation in the Local Plan. They would expect any development brought forward to fully assess the impacts on the local wildlife site, and to avoidance and mitigate for any impacts arising.	We have always proposed to retain this site as washed over by the Green Belt. Whilst it was included in the draft Local Plan as a site allocation, this was on the basis that there may be very special circumstances in the future for development here to support existing uses however this would need to be demonstrated at planning application stage. The 'Proposed Submission Local Plan: strategy and sites' does not include this site as an allocation. Any future proposals will be determined on its individual merits as part of a planning application.
Planning applications should be dealt with via usual planning process	Agreed.
Single access to site is a safety issue	This will need to be considered as part of any planning application.
Propose insetting	This does not accord with our evidence base (GBCS).

85 RHS Wisley

Issue	Guildford Borough Council Response
The application site lies partly within 400m of Ockham and Wisley Common SSSI, which is part of the SPA. Any proposals within 400m will need to ensure that they do not increase recreational disturbance on the SPA.	We have always proposed to retain this site as washed over by the Green Belt. Whilst it was included in the draft Local Plan as a site allocation, this was on the basis that there may be very special circumstances in the future for development here to support existing uses however this would need to be demonstrated at planning application stage. The Proposed Submission Local Plan: strategy and sites no longer includes this site as an allocation. Any future proposals will be

	determined on its individual merits as part of a planning application.
Support proposal	Comment noted

Comments on Traveller and Travelling Showpeople sites and Traveller pitches

Site 86 Oxenden Road

Issue	Guildford Borough Council Response
Object to proposed site allocation	No longer applicable as this site is not included as a site allocation in the 'Proposed Submission Local Plan: strategy and sites'.
Site not suitable because it is within 5km of the TBH SPA and the impact cannot be avoided by SANG (because there is no evidence base to support SANGs as required by NRM6 viii, NPPF 158 and 166.)	

87 Ipsley Lodge

Issue	Guildford Borough Council Response
Object to proposed site allocation	No longer applicable as this site is not included as a site allocation in the 'Proposed Submission Local Plan: strategy and sites'.
Support proposed site allocation	
Site not suitable because it is located within 5km of the TBH SPA and the impact cannot be avoided by SANG (because there is no evidence base to support SANGs as required by NRM6 viii, NPPF 158 and 166.)	The site has been subject to planning applications recently, and subject to the signing of a S106 agreement, the capacity of the site has been reached given the access constraints.
Occupant can deliver the proposed development	
Occupant local resident	
Occupant concerned about availability of accommodation for family	
Occupant willing to work with council to deliver development	

88 Lakeview

Issue	Guildford Borough Council Response
This allocation lies within a local wildlife site, avoidance and mitigation measures may be necessary to ensure that this allocation does not impact on this site.	The 'Proposed Submission Local Plan: strategy and sites' site allocation requires that any small scale business use on this site must not have an unacceptable impact on the adjoining Local Nature Reserve or SNCI. There is existing traveller accommodation on this site, which is not part of the Local Nature Reserve.

89 Home Farm

Issue	Guildford Borough Council Response
This is a sensitive area where community liaison work has been ongoing	Comment noted
Allocation is beyond the number of homes needed to serve village	A local housing needs survey has been carried out as part of the preparation of a planning application for six rural exception Traveller pitches. This identifies the local accommodation needs.
Support six rural exception pitches, with consultation with local residents / support rural exception approach	Comment noted. A planning application for six rural exception pitches has been submitted. The 'Proposed Submission Local Plan: strategy and sites' allocates the land for six rural exception pitches, to meet local identified need.
Support proposal for more pitches	Comment noted.
Object to proposed site allocation	Comment noted.
The land is Green Belt	The 'Proposed Submission Local Plan: strategy and sites' does not propose to amend Green Belt boundaries at Home Farm, with the land remaining as Green Belt.
No exceptional circumstances that justify development	The 'Proposed Submission Local Plan: strategy and sites' does not propose amendments to Green Belt boundaries which require exceptional circumstances. Development of additional Traveller pitches is proposed as rural exception, which does not require amendments to Green Belt boundaries.
Object to taking identified land out of the Green Belt	The 'Proposed Submission Local Plan: strategy and sites' does not propose amendments to Green Belt boundaries.
Object to providing up to six new Traveller pitches that would be available to Travellers from outside the local area.	The 'Proposed Submission Local Plan: strategy and sites' allocates land for rural exception Traveller pitches, providing affordable housing for an identified local need.
Home Farm should remain in the Green Belt to protect the land from expansion beyond what has already been agreed with Home Farm residents, namely six rural exception homes for local families only.	The 'Proposed Submission Local Plan: strategy and sites' does not propose amendments to Green Belt boundaries. Development of additional Traveller pitches is proposed as rural exception, which does not require amendments to Green Belt boundaries.
Green Belt removal could open up to non-local demand	The 'Proposed Submission Local Plan: strategy and sites' does not propose amendments to Green Belt boundaries. Development of additional Traveller pitches is proposed as rural exception, which does not require amendments to Green Belt boundaries.
Pitches should be protected from ever being built upon by residents	The 'Proposed Submission Local Plan: strategy and sites' site allocation requires that this specialist accommodation cannot be replaced by traditional bricks and mortar housing, and must remain in perpetuity as Traveller accommodation.
There is already an existing, thriving traveller community here	Comment noted. The proposals to provide 6 additional pitches, are to support the existing community, and help ease current overcrowding.

Issue	Guildford Borough Council Response
Traveller pitches should only be provided for local residents when needed, using exceptional circumstances and with agreement of local residents	The proposed pitches are for local residents, as demonstrated by the local housing needs survey submitted as part of the current planning application.
No justification for inseting around Calvert and Chester Road – would allow many more than six traveller pitches	The 'Proposed Submission Local Plan: strategy and sites' does not propose to amend Green Belt boundaries at Home Farm, with the land remaining as Green Belt.
The proposal was not discussed with residents or local groups prior to consultation	The Local Plan goes through various stages of public consultation prior to examination by a planning inspector.
Concern about community cohesion should land be inset from Green Belt and pitches open to any Traveller	The 'Proposed Submission Local Plan: strategy and sites' does not propose to amend Green Belt boundaries at Home Farm, with the land remaining as Green Belt.
Green Belt removal will open area up to unprecedented future development	The 'Proposed Submission Local Plan: strategy and sites' does not propose to amend Green Belt boundaries at Home Farm, with the land remaining as Green Belt.
Extra pitches needed for existing families	Comment noted. Sufficient Traveller pitches to meet the identified need during the plan period are proposed to be allocated in the 'Proposed Submission Local Plan: strategy and sites'.
No local demand for more pitches	A local housing needs survey prepared to support the current planning application has demonstrated a local need for additional Traveller pitches.
Spread new traveller sites across whole borough	The 'Proposed Submission Local Plan: strategy and sites' identifies sites across the borough to meet the identified need for Traveller pitches, including provision on strategic development sites.
Do not need to change Green Belt boundaries to achieve what has been agreed	The 'Proposed Submission Local Plan: strategy and sites' does not propose to amend Green Belt boundaries at Home Farm, with the land remaining as Green Belt.
There is not mains drains available	Solutions are possible to overcome this, as per the current residential accommodation in this area.
Access is unsuitable / substandard access has caused planning inspectors to refuse applications too	Junction improvements are proposed as part of the proposal for six additional pitches.
Given history of this area, a lot of evidence or reason would be needed to pursue this change in approach	Comment noted.
The area is very rural and remote from other built up areas	Whilst the area is rural, and not within the village settlement, it is a small rural community with specific accommodation needs.
GBC seeking to amend Green Belt boundaries for its own purpose – not acting neutrally, and making proposals it would not do for other landowners	The 'Proposed Submission Local Plan: strategy and sites' does not propose to amend Green Belt boundaries at Home Farm, with the land remaining as Green Belt.
Present residents are overcrowded / huge shortage of traveller accommodation in Effingham / families here who have nowhere to go / desperate need for pitches	A local housing needs survey prepared to support the current planning application has demonstrated a local need for additional Traveller pitches.
No need to increase school capacity – only 10% of pupils come from the village	The 'Proposed Submission Local Plan: strategy and sites' does not propose to increase school capacity in Effingham.
Priority should be given to current residents	A local housing needs survey prepared to support the current planning application

Issue	Guildford Borough Council Response
	has demonstrated a local need for additional Traveller pitches. Occupancy of new pitches will be allocated in accordance with the Council's allocation policy.
Prevent proposed pitches from being restricted to the local families who need them	A local housing needs survey prepared to support the current planning application has demonstrated a local need for additional Traveller pitches. Occupancy of new pitches will be allocated in accordance with the Council's allocation policy.
Travellers need accommodation for future generations	The Traveller Accommodation Assessment assesses the future need for Traveller pitches and Travelling Showpeople plots. This will be updated when appropriate.
A lot of travellers do not have stable homes and many in Home Farm are like this	Comment noted.
Health problems for many living here and better homes and less overcrowding would help	New pitches proposed to help ease local overcrowding.
Some pitches currently do not have running water and wash facilities	Comment noted. These are privately owned pitches. There are other mechanisms to address this outside of the Local Plan.
Existing problems of speeding on the lane	This is not an issue the Local Plan can address.
Risk of creating urban sprawl when combined with howard of Effingham proposals	The 'Proposed Submission Local Plan: strategy and sites' does not allocate land for development in Effingham in association with redevelopment of the Howard of Effingham School.
Village will lose sense of community	The 'Proposed Submission Local Plan: strategy and sites' proposes minor development (6 pitches).
The LP does not consider community welfare or quality of life for existing residents	The proposals for six additional rural exception pitches in the 'Proposed Submission Local Plan: strategy and sites' are in direct response to the local accommodation needs of current residents, and their welfare and quality of life.
Impact on infrastructure: <ul style="list-style-type: none"> • Roads • Medical services • Education 	<p>The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Transport Strategy and IDP may therefore be updated to include these. As planning applications are considered for the sites identified in the new Local Plan, additional transport schemes to address site access and other localised issues may be secured.</p> <p>The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure to support the planned development which is expected to place extra pressure on existing infrastructure, or to need new or improved infrastructure. The IDP will be updated as further detail on supporting infrastructure is available. Developer contributions and other funding sources will be used to ensure that key infrastructure is delivered when it is needed, including at the planning application stage.</p>
Lost confidence in GBC – contradicted rural exception agreement	The 'Proposed Submission Local Plan: strategy and sites' proposes rural exception pitches.

Issue	Guildford Borough Council Response
Change Site 89 back to the original version (Home Farm remaining Green Belt)	The 'Proposed Submission Local Plan: strategy and sites' does not propose to amend Green Belt boundaries at Home Farm, with the land remaining as Green Belt.
People are desperate here for new pitches, and the Local Plan is good for trying to address this need	Comment noted. The 'Proposed Submission Local Plan: strategy and sites' allocates pitches to help meet local need.
Too much development in Effingham, changing the nature and character of the village	The Proposed Submission Local Plan allocates significantly less development in Effingham than previous regulation 18 versions.

90 Wyke Avenue

Issue	Guildford Borough Council Response
Object to proposed site allocation	No longer applicable as this site is not included as a site allocation in the Proposed Submission Local Plan: strategy and sites'.
Support proposed site allocation	
The land is Green Belt	
Would not impact on openness of GB	
No exceptional circumstances that justify development	
The proposal would not interfere with the openness of the Green Belt	
Support two pitches here	
Question business use	
Question why included when not proposed to be inset from GB	
SANG would be needed	
Gov consulting on changes to planning for traveller sites	
Site not suitable because	
Site not suitable because it is within 5km of the TBH SPA and the impact cannot be avoided by SANG (because there is no evidence base to support SANGs as required by NRM6 viii, NPPF 158 and 166.)	
Site not suitable because it is too small	

91 Palm House Nurseries

Issue	Guildford Borough Council Response
Object to proposed site allocation	Comment noted.

Issue	Guildford Borough Council Response
The land is Green Belt	Comment noted.
Removing land from the Green Belt to allow pitches is distortion of intended policy	Planning Policy for Traveller Sites says, "Green Belt boundaries should be altered only in exceptional circumstances. If a local planning authority wishes to make an exceptional, limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site, it should do so only through the plan making process and not in response to a planning application. If land is removed from the Green Belt in this way, it should be specifically allocated in the development plan as a traveller site only."
No exceptional circumstances that justify development	We consider that there are exceptional circumstances that justify amending Green Belt boundaries. This includes the high level of need and insufficient alternative sites.
Adjusting Green Belt boundary is unfair and legally unsound	The NPPF and PPTS allows for Green Belt boundaries to be amended in exceptional circumstances when preparing a new Local Plan.
GB boundaries being amended to remove the need for VSC. VSC do not exist	We consider that there are exceptional circumstances that justify amending Green Belt boundaries. This includes the high level of need and insufficient alternative sites.
No natural boundaries to inset this site	Volume 6 of the Green Belt and Countryside Study identifies defensible Green Belt boundaries in relation to this site.
Impact on openness of GB / create island	We consider that there are exceptional circumstances that justify amending Green Belt boundaries. In the case of traveller accommodation, this will create small insets from the Green Belt.
Pitches should remain temporary and subject to review at end of planning permission period	Temporary planning permission has since been renewed for this site.
An additional 7 th pitch was recently refused by the SofS	Comment noted. Legal action continues by the site promoter in relation to this pitch. The land is not currently occupied.
Insetting would encourage future extension	Green Belt boundaries could only be amended through preparation of a Local Plan. The NPPF says that when defining boundaries, local authorities should "satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period".
SANG needed	As this development proposes nine homes or fewer, mitigation can be provided by any SANG. Adequate SANG mitigation is available.
Impact on infrastructure, particularly sewage and drainage	The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure to support the planned development which is expected to place extra pressure on existing infrastructure, or to need new or improved infrastructure. The IDP will be updated as further detail on supporting infrastructure is available. Developer contributions and other funding sources will be used to ensure that key infrastructure is delivered when it is needed, including at the planning application stage.

Issue	Guildford Borough Council Response
Site is not suitable because it is within 5km of the TBH SPA and the impact cannot be avoided by SANG (because there is no evidence base to support SANGs as required by NRM6 viii, NPPF 158 and 166.)	As this development proposes nine homes or fewer, mitigation can be provided by any SANG. Adequate SANG mitigation is available.
Site is not suitable because the boundary identified is not permanent (These pitches are defined by a temporary fence erected in the past few years and altered within the last one year)	We should be seeking to define features which, in accordance with the NPPF, are physical features that are readily recognisable and likely to be permanent. On the whole the Green Belt boundary follows features such as tree belts, woodland and roads.
The site is not suitable because there have been complaints about the site	The Planning Enforcement team deals with any breaches of the condition of planning permissions.
The site is not suitable because it is owned by travellers but sublet to eastern European workers	Planning Enforcement investigated this complaint but found insufficient evidence to demonstrate the site was not occupied by travellers.
The site is not suitable because it is inappropriate to inset when separate from village settlement	In accordance with the NPPF, the 'Proposed Submission Local Plan: strategy and sites' proposes to inset Traveller sites in order to ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development. Insetting ensures that the sites are deliverable. It is not a requirement that sites are adjoining a village settlement.
The site is not suitable because there are not any defensible boundaries	Volume 6 of the Green Belt and Countryside Study identifies defensible Green Belt boundaries in relation to this site.
The site is not suitable because the accumulated effect of the proposals to place Traveller sites along the line of the A323 from within 400m of the Worplesdon/Normandy boundary throughout Normandy	The 'Proposed Submission Local Plan: strategy and sites' proposes to allocate traveller sites across the borough and not just in Worplesdon/Normandy. Strategic development sites will include traveller pitch provision.
The site is not suitable because of the pressure on schools and problems recreated from home schooling	The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure to support the planned development which is expected to place extra pressure on existing infrastructure, or to need new or improved infrastructure. The IDP will be updated as further detail on supporting infrastructure is available. Developer contributions and other funding sources will be used to ensure that key infrastructure is delivered when it is needed, including at the planning application stage.
The site is not a family site – it is a business	This claim is not substantiated.
The lane is not suitable	The site has temporary planning permission using the lane.
Site should be reinstated to greenfield and enforced	The Proposed Submission Local Plan should identify sufficient land to meet the need for Traveller accommodation. Whilst not all temporary planning permissions for Traveller accommodation are proposed to be made permanent, some temporary permissions are proposed to be inset from the Green Belt and made permanent to help meet the identified need over the plan period.
Initially unauthorised development	Comment oted. This does not prevent the site from being allocated in the Local Plan.

92 Land to the north of Green Lane East

Issue	Guildford Borough Council Response
Object to proposed site allocation	No longer applicable as this site is not included as a site allocation in the 'Proposed Submission Local Plan: strategy and sites'.
The land is Green Belt	
The land should remain in the Green Belt / not appropriate to amend Green Belt boundary	
Fulfils 3 purposes of GB	
No natural boundary	
Unfair to inset some properties (including traveller site) and not others – equal planning for all	
No reason to include this site in settlement	
No exceptional circumstances /VSC that justify development	
Site not suitable because it is within 5km of the TBH SPA and the impact cannot be avoided by SANG (because there is no evidence base to support SANGs as required by NRM6 viii, NPPF 158 and 166.)	
Site is not suitable because of its proximity to an AONB/ANLV, and a site of archaeological significance.	
Site is not suitable because of its proximity to a site of archaeological significance.	
Site is not suitable because it is inconsistent with policy E	
Site is not suitable because the lane is not suitable	
Site is not suitable because of the impact development would have on the character of village	
Site is not suitable because of the impact of development on Impact on openness of GB, creating an island	
Site should be reinstated to greenfield and enforced	
Disproportionate amount of traveller accommodation in Normandy and Ash	
Site being used as a business	
Council ignored residents wishes and objections	
Propose council CPO land	
SANG needed	
Site was granted temporary permission – should not be made permanent and extended	
All permanent properties in Green Lane East should be included in the settlement boundary and inset from Green Belt	
Insetting should be done cautiously and any new homes supported by appropriate infrastructure	Paragraph 86 states that unless a village makes an important contribution to the openness of the Green Belt it should not be included within the Green Belt. Volume 4 of the GBCS has assessed all our villages based on the requirements of the

Issue	Guildford Borough Council Response
	NPPF.

93 Valley Park Equestrian Centre

Issue	Guildford Borough Council Response
Support three not five pitches	Comment noted. Five pitches can be accommodated within the inset boundary, and would meet likely household growth over the plan period.
Object to proposed site allocation	Comment noted.
Site not suitable because of adverse visual impact	The report in relation to planning permission 11/P/01516 noted, “unless you are on a train, you need to drive right up to the gates to see the site. The site therefore has limited visibility from the surrounding area with only glimpsed views of the pitches available from nearby public vantage points” (page 15).
Site not suitable because of increase in traffic on narrow lane	The report in relation to planning permission 11/P/01516 noted, “This site is generally accessed from the A281 via East Shalford Lane. This is a lengthy (1.5km) country lane. Whilst this is not ideal, it should be noted that the County Highway Authority has raised no objections on safety, capacity or policy grounds.” It is not thought that an additional two pitches would change this position. (page 17)
Site not suitable because of impact on AONB and views	The report in relation to planning permission 11/P/01516 noted, “Whilst it is fully accepted that the land is within the AONB, the land is not rolling landscape, prominently viewed from afar. The land is adjacent to the railway line, with half the site abutted to the north by a ‘Pressure Reducing Station’ and timber Sawmill. This is not the highest quality AONB land, and this is recognised by the fact that the edge of the AONB runs along the northern side of the railway line. Everything to the south of this line is outside of the AONB. Furthermore, one of the important tests of policy RE5 is the views into and out of the AONB. Apart from when passing on the train the views into and out of the site are very limited.” (page 16)
Object to loss of Green Belt	We consider that there are exceptional circumstances that justify amending Green Belt boundaries. In the case of traveller accommodation, this will create small insets from the Green Belt.
Five pitches not needed, as not built the three that have permission	Lack of delivery does not equate to lack of need. The need for Traveller pitches is identified in the Traveller Accommodation Assessment.
Boundary doesn’t reflect current site	The proposed inset boundary follows defensible Green Belt boundaries.
History of this site begs question of what has changed?	Many proposed development sites have considerable planning history. Sites are considered against current planning policy, and a balance is needed in order to achieve sustainable development, that provides the new development that is needed over the plan period.
Rewarding unauthorised development	The right to apply for retrospective planning permission is available to all. The site currently benefits from temporary planning permission. The Land Availability

Issue	Guildford Borough Council Response
	Assessment looks at all possible development sites in order to identify the realistic candidates for development.
NE - We advise that a LVIA is carried out to ensure that impacts can be avoided or mitigated in liaison with the AONB Unit. DLPSA/4203	A further planning application would need to comply with planning policies in relation to impact on landscape.
No VSC	We consider that there are exceptional circumstances that justify amending Green Belt boundaries. In the case of traveller accommodation, this will create small insets from the Green Belt.
Delay decision as Government consultation on changes to Traveller policy	A new Planning Policy for Traveller Sites (PPTS) was published in August 2015. Paragraph 9 of PPTS (2015) requires Local Authorities to set targets for pitches and plots which address the likely permanent and transit site accommodation needs of travellers in their area.

94 Land adjoining Wancom

Issue	Guildford Borough Council Response
Support proposed site allocation	Comments noted. The personal circumstances relating to this temporary planning permission are noted in the appeal decision (ref: 10/P/01145).
Site is well integrated	
Occupant gets on well with local community	
Occupant needs this accommodation to enable children to stay in school	
Impact of having to move on specialist education of child	
Impact on AONB	When determining the appeal for planning application (ref: 10/P/01145), the inspector commented, "the development would not conflict with the aim of conserving the natural beauty of the landscape of the AONB. This is because of the location of the site as part of the group of dwellings on this part of Puttenham Heath Road and the lack of prominence within the wider landscape. Therefore the development is acceptable within the terms of Policy C3 of the South East Plan and Policy RE5 of the Local Plan. My conclusion is consistent with that of the planning authority, which did not seek to rely on these policies to support its case. Similarly, the distinctive landscape character of the Area of Great Landscape Value would not be eroded and the aim of Policy RE6 of the Local Plan is met." (page 5)
If retained, better screening and boundary treatment needed	Currently temporary planning permission, and landscaping proportionate to the status of the permission. It is likely that if permanent permission is granted, the occupier will improve landscaping. Landscaping can be considered as part of a planning application.

95 Land to the rear of Roundabout

Issue	Guildford Borough Council Response
Object to proposed site allocation	Comment noted.
Support site allocation	Comment noted.
The site is immaculate	This is acknowledged in the Land Availability Assessment.
Site should not be removed from the Green Belt	We consider that there are exceptional circumstances that justify amending Green Belt boundaries. In the case of traveller accommodation, this will create small insets from the Green Belt.
Site should be returned to agricultural use	The 'Proposed Submission Local Plan: strategy and sites' should identify sufficient land to meet the need for Traveller accommodation. Whilst not all temporary planning permissions for Traveller accommodation are proposed to be made permanent, some temporary permissions are proposed to be inset from the Green Belt and made permanent to help meet the identified need over the plan period.
Inappropriate to remove a number of sites from the Green Belt creating a series of cases of non-Green Belt land along the Worplesdon to Ash Green Belt corridor	The NPPF and PPTS allows for Green Belt boundaries to be amended in exceptional circumstances when preparing a new Local Plan.
The land is Green Belt which should be preserved to retain the character of Guildford and traveller sites should not be located in Green Belt except in special circumstances	We consider that there are exceptional circumstances that justify amending Green Belt boundaries. In the case of traveller accommodation, this will create small insets from the Green Belt.
Very special circumstances /exceptional circumstances have not been demonstrated	We consider that there are exceptional circumstances that justify amending Green Belt boundaries. In the case of traveller accommodation, this will create small insets from the Green Belt. The 'Proposed Submission Local Plan: strategy and sites' will include a series of topic papers to help readers understand the exceptional circumstances.
Worplesdon has a fair share of Traveller accommodation in proportion to other areas of the borough / The provision of additional sites along the Worplesdon, Normandy and Ash Green Belt corridor represents an overburdening of the area	The identified need is proposed to be met through a combination of direct provision by the Council, developer provision from sites over 500 homes, and some temporary permissions becoming permanent. This achieves a distribution across the borough.
Consideration should be given to better distribution of pitches across the borough	The identified need is proposed to be met through a combination of direct provision by the Council, developer provision from sites over 500 homes, and some temporary permissions becoming permanent. This achieves a distribution across the borough.
There is not a permanent boundary for this site	The Green Belt and Countryside Study (volume 6) identified defensible boundaries for this site consisting of treelines, farm track and hedgerows.
Temporary sites should not become permanent as it sets a precedent and no protection for other fields	The 'Proposed Submission Local Plan: strategy and sites' should identify sufficient land to meet the need for Traveller accommodation. Whilst not all temporary planning permissions for Traveller accommodation are proposed to be made permanent, some temporary permissions are proposed to be inset from the Green Belt and made permanent to help meet the identified need over the plan period. The identified need is proposed to be met through a combination of direct provision by the Council, developer provision from sites over 500 homes, and some temporary

Issue	Guildford Borough Council Response
	permissions becoming permanent. Identifying sufficient accommodation to meet the need, is the most appropriate way to protect other sites from inappropriate development.
Positive discrimination for Travellers that does not apply to settled community	The NPPF says, "To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community" (page 13). The 'Proposed Submission Local Plan: strategy and sites' proposes to amend Green Belt boundaries to meet the need for housing (C3), employment land, and traveller accommodation.
The existing sites should be regulated and increased in size if necessary rather than establishing more.	The identified need is proposed to be met through a combination of direct provision by the Council, developer provision from sites over 500 homes, and some temporary permissions becoming permanent.
Concentrated amount of traveller accommodation in Aldershot Road area causing negative impact on streams, sewage, natural ancient woodland and areas of special scientific interest	The conditions of planning permissions (including temporary permissions) are subject to enforcement where appropriate. Environmental concerns are handled by the Environment Agency.
Increase in traffic / highway safety concerns/ Frog Grove Lane already congested	The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Transport Strategy and IDP may therefore be updated to include these. As planning applications are considered for the sites identified in the new Local Plan, additional transport schemes to address site access and other localised issues may be secured.
Worplesdon is recognised by the ONS to be an area of high deprivation. Wood Street Village is ranked 62nd out of 709 areas in Surrey (1 being the highest level of deprivation)	Comment noted.
Impact on infrastructure	The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure to support the planned development which is expected to place extra pressure on existing infrastructure, or to need new or improved infrastructure. The IDP will be updated as further detail on supporting infrastructure is available. Developer contributions and other funding sources will be used to ensure that key infrastructure is delivered when it is needed, including at the planning application stage.
The site appears permanent (not traveller accommodation)	The site current has temporary planning permission.
Site out of character with local area	Impact on character is a planning consideration, balanced with other considerations.

Issue	Guildford Borough Council Response
	It is not a given that the proposal is out of character just because it involves mobile homes rather than bricks and mortar homes.
Planning decision said site inappropriate in Green Belt	The 'Proposed Submission Local Plan: strategy and sites' proposes to inset this site from the Green Belt.
Gov consulting on changes to policy and this should be reflected in LP	A new Planning Policy for Traveller Sites (PPTS) was published in August 2015. Paragraph 9 of PPTS (2015) requires Local Authorities to set targets for pitches and plots which address the likely permanent and transit site accommodation needs of travellers in their area.
History of unauthorised development	The right to apply for retrospective planning permission is available to all. The site currently benefits from temporary planning permission.
No public road access	Many residential properties are accessed via private roads.
Small one pitch sites should not be included in LP	Whilst there is a site size threshold of 5 homes or more for the Land Availability Assessment (LAA) for bricks and mortar housing, a threshold has not been used for Traveller accommodation. The identified need to be met is much lower for traveller accommodation than bricks and mortar housing, and traveller accommodation has historically been provided as one pitch, and developed to provide additional pitches as households grow.

96 Four Acre Stables

Issue	Guildford Borough Council Response
Object to proposed site allocation	Comment noted
Support proposed site allocation	Comment noted
Loss of Green Belt	Comment noted
This is Green Belt which should be preserved to retain the character of Guildford	We consider that there are exceptional circumstances that justify amending Green Belt boundaries.
Very special / exceptional circumstances have not been demonstrated	We consider that there are exceptional circumstances that justify amending Green Belt boundaries. In the case of traveller accommodation, this will create small insets from the Green Belt. The 'Proposed Submission Local Plan: strategy and sites' will include a series of topic papers to help readers understand the exceptional circumstances.
Inappropriate to remove a number of sites from the Green Belt creating a series of cases of non-Green Belt land along the Worplesdon to Ash Green Belt corridor	The NPPF and PPTS allows for Green Belt boundaries to be amended in exceptional circumstances when preparing a new Local Plan.
Worplesdon has a fair share of Traveller accommodation in proportion to other areas of the borough	The identified need is proposed to be met through a combination of direct provision by the Council, developer provision from sites over 500 homes, and some temporary permissions becoming permanent. This achieves a distribution across the borough.
Consideration should be given to better distribution of pitches across the borough	The identified need is proposed to be met through a combination of direct provision

Issue	Guildford Borough Council Response
	by the Council, developer provision from sites over 500 homes, and some temporary permissions becoming permanent. This achieves a distribution across the borough.
Concern about loss of trees that enabled site lines	The conditions of planning permissions (including temporary permissions) are subject to enforcement where appropriate.
<p>Flooding:</p> <ul style="list-style-type: none"> • Concern about flood risk in area • History of flooding (The junction of Frog Grove Lane and the Aldershot Road is frequently flooded) • The main Wood Street “river” runs through this site. There is a recognised “wet spot” at the end of Frog Grove Lane at the junction with the Aldershot Road, which is badly affected when blockages occur on the northern side of the A323. 	Flood risk is a consideration for the Local Plan and development sites are subject to the flood risk sequential test, and level 2 SFRA where appropriate.
Concern about business activities at this site	The conditions of planning permissions (including temporary permissions) are subject to enforcement where appropriate.
Concern about environmental impact of bonfires and fly tipping	The conditions of planning permissions (including temporary permissions) are subject to enforcement where appropriate. Environmental concerns are handled by the Environment Agency.
The whole site, not just the pitch, should be taken out of the Green Belt and developed for Traveller accommodation	The Green Belt and Countryside Study (volume 6) identified defensible boundaries. However, this area is considerably larger than the site, and the required pitches can be accommodated within a smaller area, reducing the amount of land to be inset from the Green Belt. The ‘Proposed Submission Local Plan: strategy and sites’ allocates the site for four pitches. The site currently has temporary planning permission for one pitch. These additional pitches help to accommodate future needs of the household.
Positive discrimination for Travellers that does not apply to settled community	The NPPF says, “To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community” (page 13). The Proposed Submission Local Plan proposes to amend Green Belt boundaries to meet the need for housing (C3), employment land, and traveller accommodation.
Increase in traffic / highway safety concerns/ Aldershot Road already congested	The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Transport Strategy and IDP may therefore be updated to include

Issue	Guildford Borough Council Response
	these. As planning applications are considered for the sites identified in the new Local Plan, additional transport schemes to address site access and other localised issues may be secured.
Worplesdon is recognised by the ONS to be an area of high deprivation. Wood Street Village is ranked 62nd out of 709 areas in Surrey (1 being the highest level of deprivation)	Comment noted.
Impact on infrastructure	The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure to support the planned development which is expected to place extra pressure on existing infrastructure, or to need new or improved infrastructure. The IDP will be updated as further detail on supporting infrastructure is available. Developer contributions and other funding sources will be used to ensure that key infrastructure is delivered when it is needed, including at the planning application stage.
No reason to provide traveller accommodation / question need to provide permanent traveller accommodation	The NPPF says, "To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community" (page 13).
Sites appear permanent (not traveller accommodation)	The site current has temporary planning permission.
Impact on character of area	Impact on character is a planning consideration, balanced with other considerations. It is not a given that the proposal is out of character just because it involves mobile homes rather than bricks and mortar homes.
Site boundaries not permanent	The Green Belt and Countryside Study (volume 6) identified defensible boundaries with woodland, hedgerow and treebelts. However, this area is considerably larger than the site, and the required pitches can be accommodated within a smaller area, reducing the amount of land to be inset from the Green Belt. The boundary will follow tree belts, and the perimeter of the site.
No of traveller pitches proposed in borough is excessive	The 'Proposed Submission Local Plan: strategy and sites' proposes to meet the identified need for Traveller accommodation over the plan period.
Council neglected this area	Comment noted.
Gov guidance changing and should be acknowledged in LP	A new Planning Policy for Traveller Sites (PPTS) was published in August 2015. Paragraph 9 of PPTS (2015) requires Local Authorities to set targets for pitches and plots which address the likely permanent and transit site accommodation needs of travellers in their area. The 'Proposed Submission Local Plan: strategy and sites' proposes to meet the identified need for Traveller accommodation over the plan period.
Insetting traveller sites is contrary to NPPF, which says insetting is for villages	The NPPF and PPTS allows for Green Belt boundaries to be amended in exceptional circumstances when preparing a new Local Plan.

Issue	Guildford Borough Council Response
Close to other traveller sites	Comment noted. Many bricks and mortar properties are close to each other. PPTS says the scale of Traveller sites should not dominate the nearest settlement.
Concern about management of site	It is a private site, and is subject to planning enforcement and environmental laws, as with any land.
Site was granted temporary permission – should not be made permanent	Whilst not all temporary planning permissions for Traveller accommodation are proposed to be made permanent, some temporary permissions are proposed to be inset from the Green Belt and made permanent to help meet the identified need over the plan period. The identified need is proposed to be met through a combination of direct provision by the Council, developer provision from sites over 500 homes, and some temporary permissions becoming permanent.

97 Travellers End, Spoil Lane

Issue	Guildford Borough Council Response
No comments received	NA

98 Land south of Guildford Road, Ash

Issue	Guildford Borough Council Response
Object to proposed site allocation	No longer applicable as this site is not included as a site allocation in the 'Proposed Submission Local Plan: strategy and sites'.
Site not suitable because it is within 5km of the TBH SPA and the impact cannot be avoided by SANG (because there is no evidence base to support SANGs as required by NRM6 viii, NPPF 158 and 166.)	The site has permanent planning permission for four pitches. Part of this site is allocated in the 'Proposed Submission Local Plan: strategy and sites' for a new road bridge and footbridge to enable the closure of the level crossing on the A323 Guildford Road, adjacent to Ash railway station. A requirement of this allocation is appropriate re-provision of four Traveller pitches (sui generis).

99 Garages at Wharf Lane, Send

Issues	Guildford Borough Council Response
Object to proposed site allocation	No longer applicable as this site is not included as a site allocation in the 'Proposed Submission Local Plan: strategy and sites'.
The land is Green Belt and no exceptional circumstances presented to justify development	

Issues	Guildford Borough Council Response
Object to the loss of garages	
Garages well used / fully occupied	
Garages and space in front provide parking	
Space in front of the garages acts as a turning point for residents / only turning point	
Object to the loss of garden land	
<p>The site is not suitable due to:</p> <ul style="list-style-type: none"> • Location unsuitable • Impact on local amenity and environment • Compromises access and emergency access • Impact on on-street parking • Not big enough for proposed use / does not comply with guidance • Increased traffic / creating vehicle congestion • Impact on nature reserve at rear of site • Within 5km of the TBH SPA and the impact cannot be avoided by SANG (because there is no evidence base to support SANGs as required by NRM6 viii, NPPF 158 and 166.) • Impact on the character of the village • Impact on Wey navigation / local nature area / nature reserve • Impact on infrastructure • Increased noise • Narrow road • Insufficient space for large vehicles to turn • Elderly residents and children • Access required for public footpaths • BT above ground telephone lines crossing the proposed site • There is a water line serving the adjacent nature reserve across the proposed site. • There is a sloped approach within the site which is not suitable for a trailered vehicles – vehicles have scraped the ground with their chassis when turning. • Impact on habitats 	
Irony taking away this parking area and proposing parking in site allocation 75	
Removing an amenity is contrary to PPTS / loss of valuable amenity	
Site not needed	
Residents should not have to pay for those who choose an alternative lifestyle	
Travellers prefer more than 1 pitch (T SHLAA)	
Suggests site 74 as alternative	

Issues	Guildford Borough Council Response
Support affordable housing / old people's housing as an alternative	
Concern that although one pitch, more households would live there / encroach beyond the site area / no room to expand	
Should be provided on other proposed village extension sites in Send if needed	
Nature reserve closeby	
Agree that provision should be made on small sites distributed across borough	
Object to inseting of Send village	Paragraph 86 of the NPPF states that unless a village makes an important contribution to the openness of the Green Belt it should not be included within the Green Belt. Volume 4 of the GBCS has assessed all our villages based on the requirements of the NPPF.
Inseting in Send is contrary to NPPF	
No exceptional circumstances in Send to justify inseting the village	
There will never be enough housing sites because of immigration	The SHMA identifies the need for housing in the housing market area. The NPPF says we should use our evidence base to ensure that our Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the NPPF.
GBC's planning consultants, Pegasus Group, have omitted to identify the Heath Field wildlife area as a protected environmental site in their Study Vol III page 93. It should have equivalent status to the woodland in Send Hill adjacent to St Bede's School which is identified. This site was transferred to GBC as a permanent nature area as a condition of awarding exceptional Green Belt development permission for Sanger Drive Estate to replace previous unauthorised industrial uses.	Comment noted. No longer applicable as the 'Proposed Submission Local Plan: strategy and sites' does not propose any development near this site.

100 Cobbetts Close

Issue	Guildford Borough Council Response
Support proposed site allocation	Comment noted
Object to proposed site allocation	Comment noted
Object to loss of Green Belt	Comment noted
Very special circumstances have not been demonstrated	We consider that there are exceptional circumstances that justify amending Green Belt boundaries. In the case of traveller accommodation, this will create small insets from the Green Belt. The 'Proposed Submission Local Plan: strategy and sites' will include a series of topic papers to help readers understand the exceptional circumstances.
The site is in Worplesdon, not Normandy	Comment noted.
Development in Worplesdon/Normandy: <ul style="list-style-type: none"> There is an excessive proportion of Traveller accommodation in Normandy 	The 'Proposed Submission Local Plan: strategy and sites' proposes to allocate traveller sites across the borough and not just in Worplesdon/ Normandy. Strategic development sites will include traveller pitch provision.

Issue	Guildford Borough Council Response
<ul style="list-style-type: none"> Excessive increase in development in Worplesdon 	
Residents of Normandy were promised that the temporary sites would be temporary	Planning decisions are taken in accordance with current planning policy. The Council is not able to make such promises, as each case must be considered on its individual merits, and some cases such as appeal decisions, are outside of the Council's control.
Impact on trees and wildlife	The trees form the defensible Green Belt boundary. The proposal is primary redevelopment of the previously developed land.
Impact on flood risk	Flood risk is a consideration for the Local Plan and development sites are subject to the flood risk sequential test, and level 2 SFRA where appropriate.
Impact on infrastructure	The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure to support the planned development which is expected to place extra pressure on existing infrastructure, or to need new or improved infrastructure. The IDP will be updated as further detail on supporting infrastructure is available. Developer contributions and other funding sources will be used to ensure that key infrastructure is delivered when it is needed, including at the planning application stage.
Impact on SPA and SSSI	The proposed dwellings require the provision of Suitable Alternative Natural Greenspace (SANG). As this development proposes fewer than nine additional homes, mitigation can be provided by any SANG. Adequate SANG mitigation is available.
Increase noise and air pollution	Additional three pitches are not considered to significantly detrimentally impact on noise and air pollution.
Borough not able to accommodate growth	The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure to support the planned development which is expected to place extra pressure on existing infrastructure, or to need new or improved infrastructure. The IDP will be updated as further detail on supporting infrastructure is available. Developer contributions and other funding sources will be used to ensure that key infrastructure is delivered when it is needed, including at the planning application stage.
Positive discrimination for Travellers that does not apply to settled community	The NPPF says, "To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community" (page 13). The Proposed Submission Local Plan proposes to amend Green Belt boundaries to meet the need for housing (C3), employment land, and traveller accommodation.
Increase in traffic / highway safety concerns/ Aldershot Road already congested /	The Guildford Borough Transport Strategy and the transport sections of the

Issue	Guildford Borough Council Response
roads narrow	Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Transport Strategy and IDP may therefore be updated to include these. As planning applications are considered for the sites identified in the new Local Plan, additional transport schemes to address site access and other localised issues may be secured.
History of problems relating to this site (social and criminal)	It is acknowledged in the Land Availability Assessment that the site does not provide high quality living conditions. There are challenges in relation to this site, however, it provides accommodation for 17 households, and cannot be easily moved. The aspiration to improve the living conditions on this site and thus the outcomes and opportunities for households living here, is the driver behind providing additional pitches.
History of incursion outside of the site boundary	Comment noted. The proposed Green Belt boundary would be a clear boundary for future considerations of incursion.
History of waste dumping outside of the site	Comment noted. These are dealt with in accordance with normal procedure in relation to any environmental health concerns.
<p>Proposal would extend an already large site</p> <p>GBC promised not to increase no of pitches</p>	<p>The 'Proposed Submission Local Plan: strategy and sites' site allocations states that:</p> <ul style="list-style-type: none"> • Comprehensive redevelopment must significantly improve living conditions and infrastructure on site • Additional pitches will only be provided as part of a comprehensive redevelopment of this site, and not as a site extension <p>The proposals for this site are driven by improving the living conditions, rather than provision of additional pitches. Pitches will not be provided without a comprehensive redevelopment of the site. Examples of how the site could be redeveloped are shown in the Land Availability Assessment.</p>

Travelling Showpeople plots

101 Whittles Drive, Normandy

Issue	Guildford Borough Council Response
No objection	Comments noted.
Occupiers well integrated with local community	
No management issues foreseen	
Current occupiers are sensitive to surroundings	

124 Land to the west of Ipsley Lodge

Issue	Guildford Borough Council Response
Object to proposed site allocation	No longer applicable as this site is not included as a site allocation in the 'Proposed Submission Local Plan: strategy and sites'.
Support proposed site allocation	
Site not suitable because it is within 5km of the TBH SPA and the impact cannot be avoided by SANG (because there is no evidence base to support SANGs as required by NRM6 viii, NPPF 158 and 166.)	
Occupant can deliver the proposed development	
Occupant local resident	
Occupant concerned about availability of accommodation for family	
Occupant willing to work with council to deliver development	

Comments on Cemeteries

Site 102 - Land at Worplesdon Road, north of Tangley Place

Comment	Guildford Borough Council Response
Object to site's proposed use as a cemetery	This site is now not proposed for development
Location in the green belt is unsuitable	This now appears to be the case, although in 2014 it did not appear to be. A legal case since the 2014 draft Local Plan means that we are now considering land that we can allocate for a burial ground that could be outside the Green Belt. Land is within Green Belt land parcel J4, which is high sensitivity Green Belt, and boundaries are not proposed to be changed here.

Comment	Guildford Borough Council Response
Potential for contamination from cemetery use The land is clay with high water table and it floods, so decomposition products could enter the local watercourse	These were potential issues we had to consider further if we were to pursue this site
Alternative sites preferable A new cemetery to the east of the Borough would be more suitable	Guildford Council's Bereavement Service has considered several potential sites
No Need for cemetery Cremation is increasing, and burials are reducing	Guildford Council's Bereavement Service has advised that there is anticipated to be future need that the Council cannot provide for.
St Marys Parish of Worplesdon still has an open churchyard with space for at least another 40 years burials (extended in 2005) Woking, Guildford and Aldershot are close by. Extend them if needed Other cemeteries have sufficient space	Parish burial grounds are not open to all.
The A322 Worplesdon Road is narrow and not safe for more traffic Tangle Lane, Keens Lane and Gravetts Lane are partly single land and not suitable for likely significant increase in traffic	Although traffic movements to/from a new burial ground would not be significant, we have not progressed this site for a burial ground
<ul style="list-style-type: none"> • Insensitive use next to a care home • Strategically placed next to a care home • Need evergreen tree screening to care home 	Share some concern over of adjacent land use, although agree, screening could be used.
HRA identifies harm to Whitmoor Common SPA from additional traffic	The level of additional traffic would be most unlikely to harm the nearby SPA
NE - any new car parks will ideally be located outside of the 400m zone, or we will need sufficient certainty that the car park can be managed so it will not increase recreation on the SPA.	Visitors to car parks at any new burial ground close to SPA will have to be restricted from visiting the SPA and adding further recreation pressure.
This site should be considered for a recreational/leisure purposes e.g. a home ground for Worplesdon Rangers football club along with site 64	This site could remain in Green Belt and potentially be used for recreation.
GBC Parks Service considers this viable as a potential cemetery site; keep in draft plan	The preferred site for a new burial ground is now being progressed.

Site 103 Land to the west of Normandy, east of Westwood Lane

Comment	Guildford Borough Council Response
Need more grounds as burial sites in Normandy are full	We are proposing to allocate additional land for a new burial ground to serve the whole borough
Concerns over using this land for burials:	This site is found not to be the most suitable site for a new burial ground, but is to

<p>Flooding Concerns regarding release of mercury may lead to increased ill health in the local population</p>	<p>be allocated for residential-led mixed use development</p> <p>Surface water flooding is being addressed</p>
<p>GBC Park's Services does not consider this a viable site for a burial ground</p>	<p>This site is found not to be the most suitable site for a new burial ground, but is to be allocated for residential-led mixed use development</p>
<p>Site suitable for housing (site promoter)</p>	<p>This site should be allocated for residential-led mixed use development</p>

Comments on Allotments

Issue	Guildford Borough Council Response
<p>Site 104 – Support Site 104</p> <p>Overall support for allotments in an area of relative need, providing an opportunity for growing own food and eating healthily.</p> <p>Support Site 105</p> <p>Site 125 - Support</p>	<p>Support for sites noted. The proposed Submission Local Plan does not include site allocation 105 for allotments, however, this does not prevent allotments being delivered here in the future, through submission and determination of a planning application.</p>
<p>Parking and access to be addressed</p> <p>May be better suited at site 64 or 65 due to Slyfield expansion</p>	<p>Comment noted.</p>

106 to 117: Planning for sites, SANGS

Issue	Guildford Borough Council Response
<p>There is no evidence to support the SPA avoidance strategy. Natural England cannot demonstrate that the strategy draws visitors from the SPA.</p> <p>Natural England has stated that "in most cases it will not be possible for a local authority to be certain that any adverse affects of development could be avoided or alleviated". Alternative Natural Green Space cannot work. The fact that all sites mentioned are close to the SPA, and the Wadenzee Judgement in which the</p>	<p>The Thames Basin Heaths SPA Avoidance Strategy sets out an approach to avoiding and mitigating harm to the SPA from new development. This approach expands on the Thames Basin Heaths Special Protection Area Delivery Framework, produced by the Thames Basin Heaths Joint Strategic Partnership Board (including Natural England (NE)). The approach, which consists of management and monitoring on the SPA and the provision of SANG outside the SPA, is still maturing, with new avoidance and mitigation measures implemented in late 2015 and the first</p>

Issue	Guildford Borough Council Response
<p>European Court of Justice ruled that any plans or project may only be authorised if a competent authority has made certain that it will not adversely affect the integrity of the SPA in that no reasonable scientific doubt remains as to the absence of such effects.</p> <p>Natural England's SPA visitor survey report NECR136 2014 appeared to reflect a 10% increase in total visitor numbers</p>	<p>SANGs now approaching maturity.</p> <p>NE is the statutory body responsible for protecting the SPA and advising Councils on the most appropriate approach. Where residential development is concerned, the overall aim of the approach is to prevent increases in the number of people visiting the SPA despite a growing local population and a national trend towards increasing visitor numbers to all green spaces and countryside. NE's report NECR136 (February 2014) concludes that there was no significant evidence that overall visitor numbers have increased or decreased at the surveyed sites on the SPA between 2005 and 2012/13, so the approach is considered to be working and the Council considers that residential development does not have an adverse impact on the SPA through increased visitor numbers where the approach is followed.</p> <p>There is significant potential for better outcomes as we increase the number and quality of SANGs, and they become more well known about.</p>
<p>The plan lacks a policy dealing with the SPA</p>	<p>The plan now includes a policy that covers protection of the SPA.</p>
<p>The role and purpose of SANGs has not been explained adequately.</p>	<p>The plan now includes a policy that covers protection of the SPA. The supporting text for this policy sets out the role and purpose of SANGs.</p>
<p>110/113 – BS&Backside and Stringers Commons OBJECT</p> <ul style="list-style-type: none"> • It is inappropriate to designate commons as SANGs as they are already public and accessible • SANGs money should be used to increase the amount of recreational space available – not doing so is cheating the public • Designating a SANG could have a detrimental impact on the common • We should not turn natural space on common land into sculptured space • Wood Street Village does not require a SANG, traffic on local roads would be worsened; it is already used as a cut through and suffers high volumes • Stringers common floods in winter. Providing access all year round would be expensive. • Worplesdon has enough green space (the commons) that provide effective mitigation for Whitmoor Common SPA • Stringers common is largely wooded and waterlogged common land with very limited access only via public footpaths • This is good Green Belt land and should not be removed from the Green Belt • Broadstreet SANG is 128ha not 110ha 	<p>Broadstreet and Backside Common and Stringers Common are no longer included in the plan as proposed SANGs.</p>

Issue	Guildford Borough Council Response
<p>110/113 – BS&Backside and Stringers Commons SUPPORT</p> <ul style="list-style-type: none"> • Due to proximity of Park Barn and other housing estate, needs investment to be more attractive for leisure opportunities. Suitable location for SANG. • Natural England has not had any recent involvement, so will require: ? Site Visit ? Review SANG Management Plan ? Understand potential car parking issues and long term management - SCC 	<p>Broadstreet and Backside Common and Stringers Common are no longer included in the plan as proposed SANGs. This decision has been taken as there are other sites that are considered preferable.</p>
<p>113 – Stringers Common SUPPORT</p> <ul style="list-style-type: none"> • It will provide improvements to access and better maintenance • Natural England's support is noted • Natural England has not had any recent involvement, so will require: ? Site Visit ? Review SANG Management Plan ? Understand long term management issues regarding SCC 	<p>Broadstreet and Backside Common and Stringers Common are no longer included in the plan as proposed SANGs. This decision has been taken as there are other sites that are considered preferable.</p>
<p>112 - Russell Place Farm - Object</p> <p>The public are unlikely to visit Russell Place Farm instead of Whitmoor Common</p> <p>The SANG is too small to attract visitors from other areas. NE agree by stating that it would need to be taken as a whole.</p>	<p>SANGs are semi-natural green spaces that function as an alternative to the SPA. They have a catchment of two, four or five kilometres depending on their size. These catchments have been set out using evidence from surveys of how people use the SPA.</p> <p>Russell Place Farm SANG would have a five kilometre catchment reaching from the middle of Ash to the middle of Guildford. While some parts of its catchment are closer to Whitmoor Common than to Russell Place Farm, the majority of its catchment is not.</p>
<p>112 - Russell Place Farm - Object</p> <p>This SANG will enable Green belt development</p> <p>SANG is not required to support that level of development in this area</p>	<p>Russell Place Farm SANG would have a catchment reaching from the middle of Ash to the middle of Guildford. It will not necessarily promote development in the immediate vicinity or on the Green Belt.</p>
<p>112 - Russell Place Farm - Object</p> <p>Russell Place Farm is good agricultural land/a working beef farm/a sustainably managed farm and should not be taken from this purpose</p> <p>We are facing a national problem in terms of producing enough food for the increasing population. Importing food is not sustainable and not in-line with the government's 'food miles' reduction policy.</p> <p>The farmer had a tough time during the foot and mouth crisis</p>	<p>The owner of the land wishes to use the land as SANG and has applied for planning permission for this purpose. National planning policy requires us to protect the most versatile agricultural land. As SANGs do not include built development, beyond the provision of car parking, so the quality of the soil is not damaged.</p> <p>The Council is not able to refuse planning permission for SANG on the grounds that farming should continue on the land.</p>
<p>112 - Russell Place Farm - Object</p> <p>The existing farmland is important for the character of the Frog Grove Lane area.</p> <p>Turning it into a contrived, sculpted space would be detrimental to the character of the area.</p>	<p>SANGs are semi-natural spaces, not contrived, sculpted spaces. Designating the site as SANG means that it must be maintained as a semi-natural space.</p> <p>The SANG will require planning permission. Impacts on character and heritage are considered as part of this process.</p>

Issue	Guildford Borough Council Response
The car park will impact on the visual scene of the historic village	
112 - Russell Place Farm - Object There are nightingales on the site which need to be protected	Existing nature conservation interests must be taken into account in any SANG proposal. The Council currently has two SANGs which are also nature reserves.
112 - Russell Place Farm - Object It is already accessible so does not represent new green space It is surrounded by acres of recreational space There is already plenty of open space in the area	The land currently has a right of way passing through the north of the site, and a right of way travelling down its western boundary. However, the majority of the land is not accessible without the landowner's permission. As a SANG it would become a public open space.
112 - Russell Place Farm - Object The car park would encourage drug abuse and sexual activity	Unlawful activity is generally a matter for the police.
112 - Russell Place Farm - Object The SANG would introduce more traffic to the area, increasing danger on the bend nearby Frog Grove Lane has significant drainage issues, designating SANG could increase flooding and threaten nearby homes	The SANG will require planning permission. Impacts on highways and flooding are considered as part of this process.
112 - Russell Place Farm - Object The proposed SANGs on commons would provide more than enough SANG so this is not needed. The commons are not productive farmland so are more suitable.	A SANG at Russell Place Farm is considered preferable to SANG on common land as it represents new open space and is less constrained in terms of management.
112 - Russell Place Farm - Object This would be 'inappropriate development' for Green Belt land.	The SANG will require planning permission. Green Belt policy will be considered as part of this process. National policy requires Local Planning Authorities to look for opportunities to provide access to and for outdoor recreation on Green Belt land.
112 - Russell Place Farm - Object The site should not be a SANG as it is ideal for development: <ul style="list-style-type: none"> • Few residents to inconvenience, separated by Frog Grove lane • Roads are not busy • More appropriate for development than 118, which should be SANG 	The land is currently designated as Green Belt which means that the construction of new buildings would be considered inappropriate under national policy. The site was not identified as suitable for development in the Green Belt and Countryside Study, so is not considered as suitable for release from the Green Belt.
112 - Russell Place Farm - Object Russell Farm Place SANG is 82ha not 33ha	The land proposed for SANG is 33.36 hectares, which is around 82 acres.
112 - Russell Place Farm Natural England still need to approve the Management Plan, and see evidence of how this site will be secured in perpetuity.	The planning application is still being determined. Part of this work involves agreeing how the land will be secured and managed in perpetuity. The Council will consult with NE over any proposals.
Effingham Common OBJECT This is not listed in the plan which makes the plan unclear	The Draft Local Plan Strategy and Sites 2014 didn't include SANGs that were already delivered in the Infrastructure Delivery Plan. We have included all SANGs, current and proposed, in the Infrastructure Delivery Plan for the next version of the Local Plan.
Effingham Common OBJECT	While the designation as common land does place constraints on the work that can

Issue	Guildford Borough Council Response
There is little scope for improvements to the common	be undertaken, the Thames Basin Heaths Special Protection Area Avoidance Strategy 2009 has identified potential improvement works for Effingham Common.
<p>Effingham Common OBJECT</p> <p>There are important habitats e.g. for skylarks, lesser redpoll, turtle dove, Lesser Spotted Woodpecker, Lapwing, Hawfinch and Tree Sparrow. Increased access would impact these vulnerable species.</p> <p>The Common has some rare and special environments. GBC was considering designating it as an SSSI before the SANG issue, but, while it remains a SANG, the Common can never have this protection</p>	The Council's Parks and Countryside Service work to balance conservation needs with the role of the common as public open space. As the land is common land, this would still be required without the SANG designation.
<p>Effingham Common OBJECT</p> <p>The SANG protects the SPA which affords the protection of the Dartford Warbler, which is at a lesser degree of threat (Amber list) than Skylarks. It is not reasonable to further endanger a specially protected British bird for the sake of a European directive affecting one bird.</p>	The Council agrees that Skylarks are in need of protection and manages Effingham Common in a way that benefits Skylark populations. Management activities can draw on funding provided by the SANG designation. Designation as SANG does not mean that Skylarks cannot be conserved.
<p>Effingham Common OBJECT</p> <p>The SPA's are generally used as stop off for people travelling on the A3, and also as a (police designated) Public Sex Area (PSA). This will not change by making Effingham Common mitigate as a full 5km SANG, as these visitors will not travel far from the adjacent A3 corridor.</p>	<p>PSA is not a designation – it identifies an area within which these activities are known to happen.</p> <p>SANGs are aimed at people who visit the SPA to walk (particularly with dogs), cycle and undertake other countryside activities. The Council acknowledges that SANGs will not attract all types of SPA visitors and does not believe this is detrimental to the strategy.</p>
<p>Effingham Common OBJECT</p> <p>A full SANG with a 5km catchment will undermine green belt protection in the 5km vicinity.</p>	The availability of SANG is not a consideration over whether development is appropriate in the Green Belt. Therefore, it is not agreed that Effingham Common SANG undermines Green Belt protection.
<p>Effingham Common OBJECT</p> <p>People will not travel to the common from the Wisley development instead of going to the SPA.</p>	Effingham Common is not proposed as mitigation for the proposed development at the former Wisley Airfield. Under the terms of the SPA Avoidance Strategy, a development the size of the proposed development at Wisley Airfield would have to provide its own SANG, which would have to be agreed by Natural England.
<p>Effingham Common OBJECT</p> <p>This is not new green space</p> <p>The common land is intended to enhance Effingham, and not to attract wider footfall and pollution to offset some of the highly unsustainable developments outside the village.</p> <p>It will lead to increased traffic</p>	<p>Under the terms of the approach set out in the Thames Basin Heaths Special Protection Area Delivery Framework, SANG can be created from new or existing open space.</p> <p>The Thames Basin Heaths SPA Avoidance Strategy proposes a six space car park. This is unlikely to lead to significant increases in traffic or pollution.</p>
<p>Effingham Common OBJECT</p> <p>It will lead to anti-social behaviour in the car park</p>	Unlawful activity is generally a matter for the police.

Issue	Guildford Borough Council Response
<p>There is no viable site for a SANG car park</p> <ul style="list-style-type: none"> • No adjacent land • Parking near the station would lead to use by commuters 	<p>The Council is currently considering a number of options for a parking area. A parking area near the station could have a wait limit to prevent use by commuters.</p>
<p>Effingham Common OBJECT</p> <p>There is no need for a SANG car park as the common is accessible by train, bus, foot and cycle, people can park at the Cricket Club/the Cricket Club car park should be the SANG car park. The building of a carpark on the common will need to overturn Common Land restrictions specifically fought for in the past by the villagers of Effingham and GBC itself</p>	<p>The approach, which is set out in the Thames Basin Heaths Special Protection Area Delivery Framework, requires a parking area for the SANG to take on a full catchment of five kilometres.</p> <p>A large percentage of visitors to the SPA arrive by car. In order for the SANG to function as an alternative to the SPA, the SANG should seek to replicate this experience. Parking at the Cricket club has not been formalised.</p> <p>The Council is considering a number of options for a parking area and has not yet decided on a preferred solution.</p>
<p>Effingham Common OBJECT</p> <p>The site has no particular attractive feature that makes site desirable to visit. For the Council to define the area with a “mixture of habitat types” is very misleading. The majority of the 34 ha site is open grassland. The small mud holes (ponds?) on the site have no amenity or nature value other than as dog swimming pools. Consequently the site is used for local convenience during fine weather.</p>	<p>The common is an attractive open space. The area designated as SANG includes around five hectares of woodland (just under 15 per cent of the site). The presence of water on site can support a wide range of wildlife, and grassland restoration has been taking place for a number of years to enhance the diversity and quality of grass and flower species on the site. These features support a diversity of fauna including birds, reptiles and invertebrates and support delivery of the semi-natural space required by the SANG guidelines.</p>
<p>Effingham Common OBJECT</p> <p>The SANG is within 2 km of the SSSI site at Bookham Common and so there is a need for a screening Environmental Assessment Report, but this has not been prepared, or has not been included in the evidence base.</p>	<p>SANGs are not included in the Environmental Impact Assessment Regulations 2011 list of Schedule 1/2/3 developments. In certain cases it may be possible that specific work to enhance a SANG could require an environmental impact assessment but no work of this nature has been proposed at Effingham Common.</p>
<p>Effingham Common SUPPORT</p> <p>I would not be averse to a very small car park on Effingham Common for the use of those people using the facilities offered, provided:</p> <ul style="list-style-type: none"> ○ it is far enough away from Effingham Junction Station not to be usable as an extension of the car park there and: ○ to ensure this, it should have a time limit of a few hours on it and offer parking 'not available before ... [10am?] ○ It is not the beginning of a 'thin-end-of-a-wedge' request for more parking still, after some time has elapsed. 	<p>A parking area could be provided with a wait limit if it is considered that commuters might use it.</p>
<p>115 – Tyting farm OBJECT</p> <p>White Lane and Halfpenny Lane, C and D class roads, are already congested, are too narrow and windy for extra traffic and have dangerous footpaths and bridleway</p>	<p>The delivery of SANG at Tyting Farm would be subject to a planning application. Highways issues, including safety, access and congestion, would be considered at</p>

Issue	Guildford Borough Council Response
<p>crossings. Visitors must be protected. Busy junctions at the east and west would be dangerous Visitors to the Pilgrim's Way, the Chuntries, St Martha's Hill and Newlands Corner must be kept safe Access to the site is poor The option to site a car park in the east would be a hazard on a bendy lane. Width restrictions should prevent HGV access, except those making local deliveries. Access to Blacksmith and Halfpenny lanes should be prohibited for HGVs.</p>	<p>this stage. Surrey County Council, as the local Highway Authority, would be consulted.</p> <p>HGV drivers are unlikely to drive to the proposed SANG at Tyting Farm. Any parking area could include a height restriction bar.</p>
<p>115 – Tyting farm OBJECT Free roaming dogs are not compatible with agricultural uses</p>	<p>The Council uses cows to graze other SANGs and has been able to balance this with free roaming dogs.</p>
<p>115 – Tyting farm OBJECT People from Guildford will not drive here as an alternative to the SPA</p>	<p>Tyting Farm is closer than the nearest SPA at Whitmoor Common for many people in Guildford. The Farm is an attractive area and the Council believes that it can function as an attractive alternative.</p>
<p>115 – Tyting farm OBJECT Provision of SANG would require fencing along new rights of way, ruining the important national countryside The Farm is currently in AONB and AGLV</p>	<p>The Council is confident that the SANG can be delivered in a way that respects the existing countryside character.</p>
<p>115 – Tyting farm OBJECT There are already adequate parking spaces for dog walkers on Halfpenny Lane, White Lane and Guildford Lane. SANG would not improve facilities in this regard.</p>	<p>Under the SANG Guidelines provided by Natural England, SANGs must have their own dedicated parking area.</p>
<p>115 – Tyting farm OBJECT A new car park would be unsafe and could promote litter, fly tipping, roadside clutter and inappropriate behaviour.</p>	<p>Unlawful activity is generally a matter for the police.</p>
<p>115 – Tyting farm OBJECT The Council has agreed to keep the farm in agricultural use. Retaining this use should be a priority.</p>	<p>The management plan for the proposed SANG can include agricultural methods. The Council has been unable to find a farmer willing to take over the lease of the farm, which limits the opportunities for the site.</p>
<p>115 – Tyting farm OBJECT The Green Belt should be protected</p>	<p>The site will remain in the Green Belt if designated as SANG.</p>
<p>Tyting Farm The Council still needs to consult Natural England on SANG design, habitat management, car parking, boundary confirmation, and long term management</p>	<p>The Council is currently producing a layout plan and management plan and will consult with Natural England once it has been prepared, and informally prior to this stage.</p>
<p>117 – Burpham Court Farm OBJECT</p> <ul style="list-style-type: none"> • The open space is already accessible • The site is adjacent to the SARP waste station 	<p>Burpham Court Farm currently has a right of way travelling down its western boundary. However, the majority of the land is not accessible as it is currently</p>

Issue	Guildford Borough Council Response
<ul style="list-style-type: none"> The proposed link road would pass through the site creating impediment and noise and light pollution The site will need maintenance We are suggesting part of this land should be expansion of Slyfield Industrial Estate, part for park & Ride and the remainder for SANG. The area around Slyfield needs careful attention to ensure both that the Green belt boundary can be made permanent and that the wider aspirations to relocate businesses from Walnut Tree Close and Woodbridge Meadows can be achieved. The SANG should, perhaps also extend across to the other side of Clay Lane, be part of the highways improvements envisaged at Site 121 and provide a high quality parkland area enclosed by the River Wey branches. The farm floods every year/in winter so would not be suitable for walking dogs and recreation This area is Zone 3b Flood plain and not available year round is thus unsuitable for SANG, as it is not safely accessible for several months of the year as it is regularly flooded. It will not be within easy walking distance to any development – thus encouraging Car usage. 	<p>closed to the public. As a SANG it would become a public open space with a network of footpaths through the site.</p> <p>SANGs must function as semi-natural spaces. The intrusion of surrounding buildings and uses will be a consideration in the design. The route of the Clay Lane Link Road and the boundary of the SANG have not yet been decided.</p> <p>SANGs provide mitigation for development. The Council collects money from developers for maintenance.</p> <p>We will address the use of the land for an extension to Slyfield Industrial Estate as part of the Land Availability Assessment (LAA), the need identified in the Employment Land Needs Assessment (ELNA) and as part of the wider spatial strategy for development.</p> <p>We will consider your comment that the SANG could extend across Clay Lane to the land to the north. This land is not in Council ownership and has not been put forward for consideration as SANG by the owner</p> <p>The design of the site will take account of the flooding issues to ensure that the SANG functions as effective mitigation all year round. There are design solutions that allow access while the ground is wet, for example boardwalks and raised paths. The SANG would be within walking distance of the proposed development at Slyfield and would also serve a significant existing population. Many people use cars to visit the SPA. The SANG must provide a similar experience, so must cater to car users.</p>
<p>117 – Burpham Court Farm SUPPORT Worplesdon has enough green space (the commons) that provide effective mitigation for Whitmoor Common SPA</p>	<p>SANGs provide a particular type of open space that functions as an alternative to the SPA. Much of the open space in Worplesdon is private and as such may not be accessible. The Council has previously considered designating the commons as SANG, but has chosen not to take this option forward.</p>
<p>117 – Burpham Court Farm SUPPORT As long as the clay lane link road can still go ahead</p>	<p>The route of the road and the boundary of the SANG have not yet been set. Plans for a potential Clay Lane Link Road and a SANG at Burpham Court Farm will need to take account of each other.</p>
<p>117 – Burpham Court Farm SUPPORT As long as drainage/flooding can be dealt with</p>	<p>The SANG will be delivered through a planning application. Flooding and drainage issues on site can be considered at this stage</p>
<p>117 – Burpham Court Farm SUPPORT As long as the canal bridge to Bowers Lane can be reopened</p>	<p>We will consider this point as plans for the SANG progress.</p>
<p>117 – Burpham Court Farm SUPPORT</p>	<p>The Council is currently working on a layout and management plan for the site.</p>

Issue	Guildford Borough Council Response
<p>Once further details of this SANG have been prepared, Natural England will require: ? Site Visit ? Review SANG Management Plan.</p>	<p>Natural England will be consulted once these are ready.</p>
<p>109 – Blackwell farm OBJECT</p> <ul style="list-style-type: none"> • Impact on ancient woodland • Important recreational land will be lost (elderly population) • The land is ancient woodland and should not be disturbed (Strawberry Grove) • There is enough common land nearby, don't need artificially contrived green spaces • The public already has access to this land through existing footpaths and bridleways, it does not provide any new recreational space • Worplesdon has enough green space (the commons) that provide effective mitigation for Whitmoor Common SPA • This entire area is designated on the Ordnance Survey sheet as woodland ('Strawberry Grove' and 'Manor Copse'). This woodland is a strategic natural habitat and currently ' provides a tangible defensible and permanent boundary for the Green belt. It is not suitable for SANG without some additional areas of open space and needs full ecological studies to test its suitability. • The land has been advanced by the adjoining land owner and is describes as 'Agricultural', with further description as: "primary moderate (classification 3b) agricultural land, with an area towards the centre of good agricultural land (classification 3a), and a very small area of very good agricultural land (classification 2) on the we stem side". • No details of the SANG have been provided to Natural England so far, further details will be required of the SANG design and management. 	<p>Blackwell Farm SANG was included in the draft Local Plan Strategy and Sites 2014 as a bespoke SANG for the development at Blackwell Farm. The proposed submission Local Plan Strategy and Sites 2016 does not designate land for bespoke SANG. It is the responsibility of the developer to propose sufficient appropriate SANG to provide mitigation for their development. Proposals for bespoke SANG will be submitted as part of a planning application and evaluated as part of the planning process, in consultation with Natural England.</p>
<p>116 – Wisley Airfield SANG OBJECT</p> <ul style="list-style-type: none"> • There is no evidence that Natural England approve of the principle of a SANG in this location. • The proposed SANG is inadequate for the development – 39ha gives only 8ha per 1000 people, the minimum requirement. This is not good enough for a development so close to the SPA. • The position of the SANG (adjacent to the SPA) would draw people towards the SPA, the opposite of its purpose. • 4 foot/bridle paths would need to be closed to prevent people from moving from the SANG to the SPA • The shape of the SANG would lead to pinch points and a contrived circular walk • The SANG is far from public transport services so is not sustainable • On the basis the overall development is too small, this site -part of the previously developed land in the Green Belt -may be required for additional 	<p>The SANG at the former Wisley Airfield was included in the Draft Local Plan: strategy and sites 2014 as a bespoke SANG for the development at the former Wisley Airfield. The Proposed Submission Local Plan: strategy and sites 2016 does not designate land for bespoke SANG. It is the responsibility of the developer to propose sufficient appropriate SANG to provide mitigation for their development. Proposals for bespoke SANG will be submitted as part of a planning application and evaluated as part of the planning process, in consultation with Natural England.</p>

Issue	Guildford Borough Council Response
<p>housing and it is likely that any SANG provision should be to the south of the development and configured in such a way as to provide meaningful visual and physical separation from Ockham Village</p> <ul style="list-style-type: none"> • Are there any precedents for SANGs within the 400m SPA exclusion zone? • The SANG has not been discounted for its conservation value or current use as per the SPA strategy. 	
<p>There are 760 access points around the TBHSPA across 13 section of the Heath. Without Wardens who will monitor the SPA? SAMMS is unlikely to have any effect upon visitor numbers or the behaviour of visitors.</p>	<p>Wardens are now present on the SPA as part of the Strategic Access Management and Monitoring (SAMM) programme.</p>
<p>108 – Ash SANG OBJECT SANG should not be put so close to Ash Ranges SPA The SANG will not be an effective alternative to the SPA as the Ash Ranges are a very attractive area and close to the proposed development.</p>	<p>The SANG has been brought forward by the owner of the land through a planning application. The SANG has now been granted planning permission. The land will be improved and will include parking in order to make it more attractive to SPA visitors. SANGs are part of a suite of measures, which include access management on the SPA.</p>
<p>108 – Ash SANG SUPPORT The SANG situation in Ash is urgent. This SANG is needed with others. Natural England would appreciate an update from GBC on this SANG.</p>	<p>The SANG has been brought forward by the owner of the land through a planning application. The SANG has now been granted planning permission. The Council is currently working on a mechanism to make the SANG available for other developers.</p>
<p>107 – Benswood OBJECT Benswood is unlikely to provide mitigation as it is already well used, especially by dog walkers.</p>	<p>The proposed submission Local Plan Strategy and Sites 2016 regards Benswood SANG as a bespoke SANG for two developments being promoted by the SANG owner and does not designate land for bespoke SANG. It is the responsibility of the developer to propose sufficient appropriate SANG to provide mitigation for their development. Proposals for bespoke SANG will be submitted as part of a planning application and evaluated as part of the planning process, in consultation with Natural England.</p>
<p>107 – Benswood SUPPORT Bens Wood outline has changed – outline provided Natural England has visited this proposed SANG, of 7.1ha (not 5ha as stated in the allocation). A SANG solution appears to be deliverable, although we have not reviewed (or approved) the SANG Management Plan or seen evidence of how it will be managed in perpetuity.</p>	<p>The Proposed Submission Local Plan: strategy and sites 2016 regards Benswood SANG as a bespoke SANG for two developments being promoted by the SANG owner and does not designate land for bespoke SANG. It is the responsibility of the developer to propose sufficient appropriate SANG to provide mitigation for their development. Proposals for bespoke SANG will be submitted as part of a planning application and evaluated as part of the planning process, in consultation with Natural England.</p>
<p>We note that some of the new SANGS proposed are closer to proposed housing sites but it appears likely that they will affect Thames Basin heathland as well as the</p>	<p>The Proposed Submission Local Plan: strategy and sites 2016 includes a new policy on biodiversity and a policy dealing specifically with the SPA. Policy related to</p>

Issue	Guildford Borough Council Response
<p>biodiversity of the Borough as a whole. The whole draft local plan is weakened by the absence of a clear policy on biodiversity and SANGS.</p>	<p>SANGS is delivered through the Thames Basin Heaths SPA Avoidance Strategy, which will be updated as a Supplementary Planning Document.</p>
<p>111 Gosden Hill SANG – SUPPORT The site needs more footpaths that can be provided through SANG provision Worplesdon has enough green space (the commons) that provide effective mitigation for Whitmoor Common SPA Natural England has had pre-applications with the applicant in August 2014. A SANG solution appears to be deliverable, although we have not reviewed (or approved) the SANG Management Plan or seen evidence of how it will be managed in perpetuity.</p>	<p>The SANG at Gosden hill Farm was included in the draft Local Plan Strategy and Sites 2014 as a bespoke SANG for the development at Gosden Hill Farm. The Proposed Submission Local Plan: strategy and sites 2016 does not designate land for bespoke SANG. It is the responsibility of the developer to propose sufficient appropriate SANG to provide mitigation for their development. Proposals for bespoke SANG will be submitted as part of a planning application and evaluated as part of the planning process, in consultation with Natural England.</p>
<p>111 Gosden Hill SANG – OBJECT This entire area is designated on the Ordnance Survey sheet as woodland ('Frithy's Wood' and 'Catts Wood'). This woodland is a strategic natural habitat and currently provides a tangible defensible and permanent boundary for the Green belt. It is not suitable for SANG without some additional areas of open space and needs full ecological studies to test its suitability. The land has been advanced by the adjoining land owner and is described as 'Agricultural', with further description as: "A very small strip of land at the north of the site bordering the A3 is good (classification 3a) agricultural land of which an even smaller area is very good (classification 2). The rest of the land is moderate agricultural land (classification 3b), although the land is not used for agricultural purposes".</p>	<p>The SANG at Gosden hill Farm was included in the Draft Local Plan: strategy and sites 2014 as a bespoke SANG for the development at Gosden Hill Farm. The Proposed Submission Local Plan: strategy and sites 2016 does not designate land for bespoke SANG. It is the responsibility of the developer to propose sufficient appropriate SANG to provide mitigation for their development. Proposals for bespoke SANG will be submitted as part of a planning application and evaluated as part of the planning process, in consultation with Natural England.</p>
<p>114 – Tongham Pools - COMMENT Access to this land needs to be improved if it is to attract people The site is not well-located for vehicular access as public open space and the site is remote from allocated development sites meaning that this is unlikely to provide a suitable mitigation strategy for new housing. Still unresolved issues around the Surrey County Council policy on uplift when its land is used as SANG (NE)</p>	<p>Tongham Pools is not proposed as a SANG in the pre submission Local Plan Strategy and Sites 2016.</p>
<p>106 – Alderton's Farm SANG SUPPORT Aldertons farm is bigger than shown and could mitigate 750 homes, 525 more than the attached development. Natural England has had pre-applications with the applicant in Dec 2013. A SANG solution appears to be deliverable, although we have not reviewed (or approved) the SANG Management Plan or seen evidence of how it will be managed in</p>	<p>Aldertons Farm SANG is not included in the Proposed Submission Local Plan: strategy and sites 2016.</p>

Issue	Guildford Borough Council Response
perpetuity.	
<p>106 – Alderton’s Farm SANG OBJECT</p> <ul style="list-style-type: none"> • It adds no benefit to the village as the land is already accessible. • There are archaeological features on the site. English Heritage should be aware of the proposal. The monument should be protected and enhanced • Heathfield and the wildlife reserve at the Medical Centre are not well managed by GBC, how will this be different? 	Aldertons Farm SANG is not included in the Proposed Submission Local Plan: strategy and sites 2016.
<p>The proposed SANG's in the plan are often on areas which are already common land, or already farmland with adequate access via footpaths. In these cases SANG's provide little new natural access space in the borough. You can't make them a natural green space a second time.</p> <p>By designating these areas as SANGS, development will be permitted within the 5km catchment of Special Protection Areas such as Whitmore Common, which is also a Site of Special Scientific Interest. In my opinion, this is an underhand tactic as there is no actual need to formally designate there areas, which are already used for recreation and respected as such. Some of these sites will require development such as increased car parking to bring them to the standard required to be SANGS which will impact on the environment of these sites, as well as again attracting more traffic.</p>	The proposed common land SANGs are not included in the proposed submission Local Plan 2016. SANGs on farmland often have footpaths across them, but the greater part of the land is in private ownership and as such is not accessible. Providing the land as SANG means the whole of the site becomes public open space.
We should build less instead of mitigating through SANG.	National policy requires the Local Plan to boost significantly the supply of housing. In order for SANG to act as a constraint on development, we would need to show the Local Plan examiner that we have considered all options for SANG and that none were deliverable. The options we have considered for SANG have been shown to be deliverable, so we are unlikely to be able to use SANG as a constraint.
The proposed SANGS do not appear to have been discounted for current recreational use or for conservation uses, as required by the TBH SPA Avoidance Strategy 2009-2014.	<p>The Thames Basin Heaths Special Protection Area (TBH SPA) Avoidance Strategy states that discounting applies where SANGs are brought forward on existing public open space. The Proposed Submission Local Plan: strategy and sites 2016 does not propose any SANGs on existing public open space, so discounting will not apply.</p> <p>Some areas of common land were proposed for use as SANG in the Draft Local Plan: strategy and sites 2014. Had this option been pursued, discounting would have been applied in line with the strategy.</p>
If evidence that SANGs work exists, this should be put in the evidence base.	Natural England are currently producing a report that examines the effectiveness of

Issue	Guildford Borough Council Response
<p>The Government decided to retain the South East Plan Policy NRM6 "in order to assist those local authorities bringing forward up to date local plan which incorporate the mitigation strategy contained in Thames Basin Heaths Special Protection Area Delivery Framework." Guildford will therefore need to transpose this policy within their Local Plan to ensure compliance with the Conservation of Habitats and Species Regulations 2010 (as amended) as it is likely that NRM6 will be revoked in due course.</p> <p>Compliance with the Conservation of Habitats and Species Regulations 2010 (as amended) as it is likely that NRM6 will be revoked in due course. We advise that you review Policy CP14B from Surrey Heath's Core Strategy, and Policy CP8 from Wokingham's Core Strategy for examples on drafting a strategic policy for Thames Basin Heaths.</p>	<p>SANGs and SAMM.</p> <p>The Proposed Submission Local Plan: strategy and sites 2016 includes a policy for the Thames Basin Heaths SPA.</p>
<p>The Local Plan and HRA have not demonstrated that there will be sufficient and adequate SANG available for each allocation, therefore the ability to deliver these allocations is in question. This issue has also been identified in the HRA. For each housing allocation, where TBHSPA mitigation is required, we will require evidence of SANG hectarage, capacity and catchments. For larger allocations, we would expect bespoke SANGs to come forward and suitable SANG land allocated as part of the Local Plan.</p>	<p>Evidence of sufficient SANG in the right locations is provided in the Infrastructure Delivery Schedule (IDP) that accompanies the proposed submission Local Plan Strategy and Sites.</p> <p>For bespoke SANGs, we expect developers to engage with Natural England directly to obtain approval for SANG proposals. This will be judged as part of a planning application.</p>
<p>The spread of SANG does not pay attention for the need for SANG to be strategically located in relation to the development – it must be between the development and the SPA.</p>	<p>The approach set out in the Thames Basin Heaths Special Protection Area Delivery Framework, written by the Thames Basin Heaths Joint Strategic Partnership Board requires development to fall within the catchment of the SANG that provides mitigation. It does not specify that SANG should fall between development and the SPA.</p>
<p>Note that in the recent judicial review in relation to Ashdown Forest, the SANG zone for the Ashdown Forest SPA was 7km, and this gave rise to a lower housing number than that proposed by the local authority.</p>	<p>The zone of influence for the Thames Basin Heaths SPA is set out in the Thames Basin Heaths Special Protection Area Delivery Framework, written by the Thames Basin Heaths Joint Strategic Partnership Board. The Council would be unable to extend this zone to 7km, without compelling evidence as a reason for doing so. The Proposed Submission Local Plan: strategy and sites 2016 proposes enough SANG to deliver the development proposals.</p>
<p>St. Martha Parish Council would like the Borough Council to consider the inclusion of one other SANG in the new Plan. This would encompass the Chilworth Gunpowder Mills site and the field (recently acquired by the Guildford Diocese</p>	<p>The Council is considering this proposal.</p>

Issue	Guildford Borough Council Response
immediately north of the Chilworth Infant School and Percy Arms Public House) with a total area of 12.8 hectares.	
<p>The relevant text in the Draft Local Plan is totally inadequate. It presents no clear reasoned statement or explanation of strategic policy whatsoever to support the inclusion a mixture of SANGS, some of which are already designated, and some of which are proposed.</p> <p>CPRE object to the way in which SANGS are not explained more adequately.</p>	<p>The Proposed Submission Local Plan: strategy and sites 2016 includes an SPA policy which sets some information about SANGS. The Infrastructure Delivery Plan which accompanies the plan sets out the full suite of existing and proposed SANGS and shows how they will provide mitigation for the proposed developments.</p>
<p>In Appendix C Evidence Base, towards the end of its first subsection called 'Research' there is a statement which says that a document called the Thames Basin Heaths Special Protection Area Avoidance Strategy 2009-14 will be carried forward and adopted and become part of the new Plan. It is not adequate to cite a policy document which has already run its course (2009-14) and is due for renewal. Is it really to be swept through into the Local Plan unchanged? Or is it to be replaced by an updated version? The Draft Local Plan must state clearly which is the case, because this obviously has consequences for all the sites listed.</p>	<p>The Thames Basin Heaths SPA Avoidance Strategy has been extended to 2016 and will be replaced in due course. One of the main purposes of the strategy is to set out how development will be mitigated by demonstrating enough SANG capacity in the right places. We therefore need to know the likely amount and spatial pattern of development in the next plan period so it was not possible to replace the strategy ahead of the Local Plan.</p>
<p>It is also unclear as to why there are two types of SANG, one inset from the Green Belt. There does not appear to be any need to inset as SANG is not to be built on, therefore can be left within the Green Belt.</p>	<p>There is no proposal to inset any SANGs from the Green Belt.</p>

Planning for sites – safeguarded

118 - Land adjoining Fairlands

Issue	Guildford Borough Council Response
Support safeguarding	<p>We no longer believe that safeguarding is an appropriate option for Guildford. This is discussed further in the Green Belt and Countryside topic paper.</p>
<p>Objection to safeguarding (do not want the land to be developed) because of:</p> <ul style="list-style-type: none"> • Flooding (site has already flooded several times in the last decade) • Sewage system inadequate • Power infrastructure is inadequate, have already suffered power cuts. • Traffic (congestion is already a problem especially with the school run and the school is being expanded to cope with demand.) Already 	<p>No longer applicable as this site is no longer included as a site allocation in the 'Proposed Submission Local Plan: strategy and sites'.</p>

Issue	Guildford Borough Council Response
<p>congested / narrow (Aldershot Road/A322/A323/ Rydes Hill roundabout)</p> <ul style="list-style-type: none"> • Road safety for pedestrians (school children) • General call to protect the green belt (it is a slippery slope, slowly eroding the green belt until there is nothing left) need to demonstrate exceptional need. • Urban sprawl, connecting Fairlands and Wood Street Village. • Water system • Health services will be overwhelmed • Community facility will be overwhelmed • Character of the village will be altered (doubled in size) • Education system will be overwhelmed • Protect wildlife(Great crested newts, Adders, Grass snakes,Deer,Bats,Owls,and woodpeckers, badgers.) • Close to special natural conservation site such as the Whitmoor and Broad Street Commons. • Increase in crime • Need to build extra access to site to incorporate new homes 	<p style="font-size: 48px; opacity: 0.3; transform: rotate(-45deg); pointer-events: none;">Draft</p>
<p>If development goes ahead will the council enforce strict rule on the developers to make sure the noise, traffic and everything else does not affect the town.</p>	
<p>If they go forward, will the property be affordable?</p>	
<p>The term “Safeguarding” for land earmarked for development seems to be internally misleading and thus dishonest. It is inevitable that another site will fall through due to the high targets and levels of opposition within the current plan thus this site will be developed in the current plan if it is allowed to be “safeguarded”</p>	
<p>Disturbing Quaker burial grounds</p>	
<p>Build a new village</p>	
<p>Make bike lanes</p>	
<p>Number of homes too high / flawed evidence</p>	
<p>Railway station</p>	
<p>Council rejected planning permission to build extensions giving the reason that this area is staying in the green belt</p>	
<p>Within 5km of the Thames Basin Heaths SPA, and therefore any development is subject to EU/UK legislation (NPPF 119).</p>	
<p>Should only be considered for development after a full LP review (not partial)</p>	

Issue	Guildford Borough Council Response
NPPF states that it should be between urban area and GB	
Paragraph 85 makes it clear that "planning permission for the permanent development of safeguarded land should only be granted following a local Plan review which proposes the development". The Policy clearly does not allow "the flexibility to meet our current development needs should any of our strategic sites not come forward as envisaged over the plan period".	
Objection to Safeguarding (believes the land is suitable to be developed within the current plan period and in fact better than other sites that are being developed in the current plan)	

119 - Land between Normandy and Flexford

Issue	Guildford Borough Council Response
Support principle of safeguarding	We no longer believe that safeguarding is an appropriate option for Guildford. This is discussed further in the Green Belt and Countryside topic paper.
Constraints should be applied to housing number Green Belt should be protected / important countryside Exceptional circumstances not demonstrated / unmet housing need is not one	These comments have been responded to in the table for Policy 10.
Meets purposes of Green Belt/ Prevents merging of settlements / Inspector concluded openness / GBCS high sensitivity	Whilst Green Belt sensitivity is one factor, it cannot be seen in isolation. We have considered it alongside other sustainability factors. In the case of this site we consider there are significant benefits to allocating this land. This is discussed further in the Housing and Delivery topic paper.
Site not suitable because of Flooding/drainage issues	<p>The majority of the site is at low risk of fluvial flooding (flood zone 1). A small part of the site near Walden's Copse is located within flood zones 2 and 3, associated with Stanford Brook. A Fluvial Flood Study has been undertaken on the site.</p> <p>The site is at risk of surface water flooding, and adjoins a surface water flooding hotspot area (Flexford), as set out in the Guildford surface water management plan. A drainage strategy would be required to mitigate any potential surface water flooding. Safe access and egress to the site is achievable to the north east and north west.</p> <p>See the SFRA Level 2 and flood risk sequential test for more information.</p>

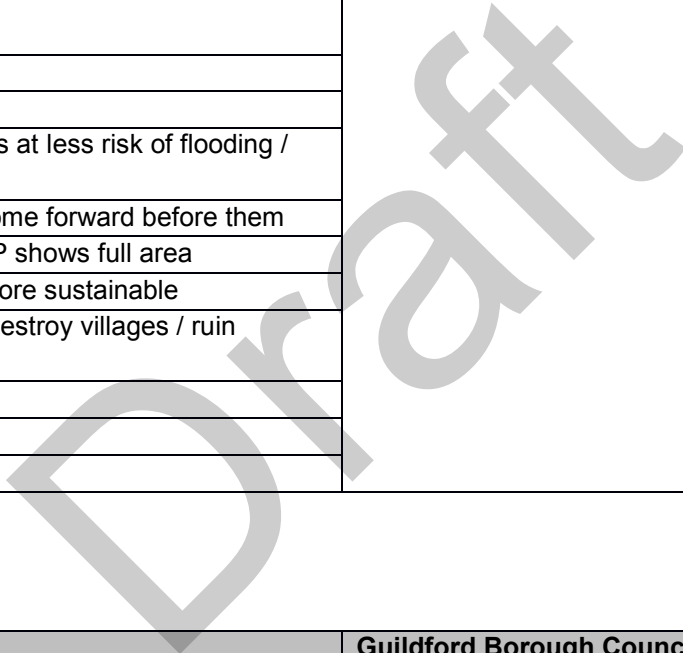
Issue	Guildford Borough Council Response
Site not suitable because: <ul style="list-style-type: none"> • Impact on wildlife/ ancient woodland • The land contains many strands of scheduled Ancient Woodland 	This will be considered at detailed design stage with appropriate mitigation
Site not suitable because no evidence SANG works	The SANG approach has been established by the Joint Strategic Partnership Board and is overseen by Natural England. Natural England monitors the approach to ensure that it is effective.
Site not suitable because: <ul style="list-style-type: none"> • Impact on environment / rural character /amenity • Development will harm countryside / footpaths, access to countryside • Should not be inset because it lacks conservation area status to protect it 	<p>Any proposals will need to demonstrate at planning application stage that they are of high quality design and in keeping with the character of the surrounding area. In response to this concern the Proposed Submission Local Plan includes a new policy on development in urban areas and inset villages.</p> <p>The Proposed Submission Local Plan now includes a policy which supersedes the former Local Plan 2003 R5 policy. This policy seeks to protect areas of open land within non-Green Belt areas that is of public value due to its amenity.</p>
Site not suitable because of impact on landscape/views of Hogs Back/AONB review	The site is neither within the AGLV or on land recommended for AONB inclusion. It is not considered that development here would have an adverse impact on the wider landscape.
Site not suitable because of: <ul style="list-style-type: none"> • Impact on Ash Ranges SSSI / SPA • Nearest SANG too far away to walk to • No SANG 	Bespoke SANG will be provided by the site owner (see Infrastructure Delivery Plan).
Site not suitable because of: <ul style="list-style-type: none"> • Loss of agricultural land • Will harm rural economy (farming) 	Loss of agricultural land has been considered as part of the Sustainability Appraisal process.
Site not suitable because: <ul style="list-style-type: none"> • Roads already congested / narrow /dangerous junctions (A3/ B3000 /A323 /A322 / Westwood Lane/ Glaziers Lane/A31/Cobbett Hill Road/Wanborough Hill) • School children crossing A323 dangerous • Limited public transport/cycleways 	The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'. Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Transport Strategy and IDP may therefore be updated to include these. As planning applications are considered for the sites identified in the new Local Plan, additional

Issue	Guildford Borough Council Response
	transport schemes to address site access and other localised issues may be secured.
Site not suitable because: <ul style="list-style-type: none"> • No supporting infrastructure (shops/PO) • Limited services and facilities in Normandy (no shops/PO/pub) 	The site is allocated for a mix of uses which will support the planned growth and the existing community.
<ul style="list-style-type: none"> • Does not 'adjoin' a village 	The site adjoins Flexford to the south and Normandy to the north.
Site not suitable because services can't cope (primary school/GP/sewage/electricity)	The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure to support the planned development which is expected to place extra pressure on existing infrastructure, or to need new or improved infrastructure. The IDP will be updated as further detail on supporting infrastructure is available. Developer contributions and other funding sources will be used to ensure that key infrastructure is delivered when it is needed, including at the planning application stage.
Site not suitable because of impact on local tourism	It is not considered that development here would impact on local tourism.
Site not suitable because of: <ul style="list-style-type: none"> • Limited parking at Wanborough station • rail station too far away/ lack pavement/ parking 	The site is in close proximity to Wanborough railway station. Opportunities to improve station facilities such as parking and cycle storage will be explored alongside improved connectivity to the station at planning application stage.
Site not suitable because of increase in noise/air pollution	This will be considered at detailed design stage with appropriate mitigation.
Site not suitable because it is disproportionate	Our spatial strategy is based on sustainability considerations and our spatial hierarchy rather a proportionate growth approach.
Site not suitable because it merges Ash and Guildford	There is considered to be sufficient land between Normandy/Flexford and both Ash and Guildford for each to retain their separate identities.
Should not assess Normandy and Flexford as one	The Settlement Hierarchy was revised following feedback and now assesses each village separately.
Site not suitable as: <ul style="list-style-type: none"> • Merge two villages • Does contribute to openness of GB • Parish council has enhanced beneficial use of GB in accordance with NPPF 81 	Whilst the land parcel is assessed as highly sensitive Green Belt and development would lead to merging of the two villages, it is considered that the benefits of allocating the site outweigh the harm.
<ul style="list-style-type: none"> • Safeguarding leads to blight • Should not be identified if no immediate need / creates uncertainty • Safeguarded land should be adjoining urban areas as more sustainable • Provision of safeguarding has been misapplied 	We no longer believe that safeguarding is a realistic and appropriate option for Guildford. This is discussed further in the Green Belt and Countryside topic paper.
<ul style="list-style-type: none"> • Change in traveller policy 	The 'Proposed Submission Local Plan: strategy and sites' must conform with Planning Policy for Traveller Sites (2015). In accordance with the identified need for

Issue	Guildford Borough Council Response
	Traveller accommodation, the 'Proposed Submission Local Plan: strategy and sites' identifies how that need is to be met. The NPPF requires Local Authorities to plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community.
Crematorium/cemetery inappropriate near primary school	The 'Proposed Submission Local Plan: strategy and sites' no longer includes a burial ground nearby in Worplesdon.
Score for 'wider employment market' in Settlement Hierarchy when other villages don't	The village is accessible to wider employment opportunities due to proximity to Wanborough train station
Impact on listed buildings and Romano British Temple Exhibit 1	Development proposals must have regard to the setting of a listed building.
Should use instead small scale in fill	This would be insufficient to meet our objectively assessed development needs
Should use Brownfield sites instead	Brownfield land is at the top of our spatial hierarchy however there is insufficient land to meet our objectively assessed housing needs.
Not clear how many homes it could accommodate	The Proposed Submission Local Plan allocates this site for 1,100 homes
Development should contribute to expanded St Wykes Church – important community facility	The strategic development planned for Normandy would need to contribute to provide an additional form of entry at this school.
Not meeting full OAN so should allocate full site	Comment noted. The Proposed Submission Local Plan allocates this site and seeks to meet OAN

120 - Land to the north of Send Marsh

Issue	Guildford Borough Council Response
Support principle of safeguarding Support proposal	We no longer believe that safeguarding is an appropriate option for Guildford. This is discussed further in the Green Belt and Countryside topic paper.
Green Belt should be protected / important countryside	No longer applicable as this site is not included as a site allocation in the 'Proposed Submission Local Plan: strategy and sites'.
Serves Green Belt purposes	
Have not demonstrated exceptional circumstances	
No benefit to removing this land from GB	
Site not suitable because: <ul style="list-style-type: none"> Partly in flood zone / history of flooding / surface water flooding / drainage Development would increase flood risk elsewhere Impact on wildlife (bats/sparrow hawks/deer/stoats) TPO at entry Access difficult (Send Marsh Road busy and narrow/Danesfield narrow) 	

Issue	Guildford Borough Council Response
and private) <ul style="list-style-type: none"> • Impact on environment / rural character /amenity • Roads already congested / narrow (Send Marsh Road/Send Dip) • No supporting infrastructure (shops/schools/GP) • Limited public transport • Impact on environment / rural character /amenity • Impact on SPA / no evidence SANG effective • Too far away from main settlements • Not sustainable development 	
Should use Brownfield sites instead	
Term safeguarded is misleading	
Should follow flooding policy / should look for alternatives at less risk of flooding / contrary to advice from EA	
Scores less than Fairlands or Flexford and should not come forward before them	
Was agreed site would not include flood risk area, but LP shows full area	
Safeguarded land should be adjoining urban areas as more sustainable	
Too much proposed development in Send and Ripley / destroy villages / ruin character	
Other sites more suitable	
Stop right to buy and keep affordable housing	
No need for new homes	

121 - Clay Lane Link Road

Issue	Guildford Borough Council Response
Support improvements it could bring to local congestion (reduce traffic on Woking road and Jacobs Well Road)	No longer applicable as this site is not included as a site allocation in the 'Proposed Submission Local Plan: strategy and sites'. The Clay Lane Link Road scheme is considered not to be a key infrastructure requirement on which the delivery of the 'Proposed Submission Local Plan: strategy and sites' depends.
Site is Green Belt / development inappropriate	
Within 5km of the Thames Basin Heaths SPA, and therefore any development is subject to EU/UK legislation (NPPF 119).	
There is already provision in the NPPF to build transport infrastructure in the Green	

Belt so why take a large amount of land out of the green belt to build a road when you can build a road anyway. Answer: back handed way to remove land from the greenbelt for latter development	<p>Nevertheless, the Clay Lane Link Road is an 'aspirational' scheme in the Council's Guildford Borough Transport Strategy (April 2016). An 'aspirational' status has been defined as 'A strong business case will need to be demonstrated in order to secure funding as the estimated cost presently exceeds typical funding envelopes and/or there are significant planning and statutory approvals to be achieved.'</p> <p>Future proposals for the Clay Lane Link Road scheme will need to be progressed as part of a planning application and be assessed according to its merits.</p> <p>It is now proposed in the 'Proposed Submission Local Plan: strategy and sites' that vehicular access to the new council waste management depot, waste facilities and new sewage treatment works which form part of the Slyfield Area Regeneration Project site (site allocation policy A24) will be via Moorfield Road and Westfield Road.</p>
Road not suitable because:	
<ul style="list-style-type: none"> • Crosses flood plain which floods regularly • Will impact use Riverside Park and Nature Reserve • Impact on wildlife • Noise and air pollution • Increase road traffic in Burpham • Clay Lane a country lane • Danger to cyclists • Local roads already congested (A320) • Impact on local residents (Jacobs Well/Burpham/Merrow) 	
Unclear on alignment	
Access to sewage treatment works should instead be off Woking Road	
Access to sewage treatment works should instead be of improved Moorfield Road	
Should be creating high tech jobs instead	

122 - Sustainable Movement Corridor

Issue	Guildford Borough Council Response
Should identify an indicative pathway route instead to enable flexibility on the alignment when bringing forward other site allocations	<p>In the 'Proposed Submission Local Plan: strategy and sites', the route sections of the Sustainable Movement Corridor are named in Appendix C Infrastructure Schedule. Further definition of the route sections is set out in the Transport Topic Paper (June 2016).</p> <p>Phases for the delivery of the Town Centre route section of the Sustainable Movement Corridor are set out.</p> <p>With the implementation of Sustainable Movement Corridor: Town Centre Phase 1 (scheme SMC3), which would follow the experimental closure of Walnut Tree Close (with the option of making this a permanent change) as part of the Guildford Town Centre Transport Package (scheme LRN1), pedestrians and cyclists travelling to and from the Stag Hill campus and further afield will be encouraged to use the present Yorkie's Bridge and then continue southwards towards Guildford railway</p>
Given site allocation policy 24 Land and buildings at Guildford railway station focuses on residential uses, the route should exclude buses	
Strip of land is insufficient for Section 1 of the SMC (see Appendix B 2.1.1) – need greater safeguarding	
The GTAMS route has not yet been identified and this land is reserved as a continuation of the 2003 reservation	

Issue	Guildford Borough Council Response
	<p>station via the southern section of Walnut Tree Close.</p> <p>With the implementation of Sustainable Movement Corridor: Yorkie's Bridge (scheme SMC2), buses will be able to cross the new replacement Yorkie's Bridge, which also will include provision for pedestrians and cyclists. Pedestrians, cyclists and buses will continue southwards towards Guildford railway station via the southern section of Walnut Tree Close.</p> <p>With the implementation of Sustainable Movement Corridor: Town Centre Phase 2 (scheme SMC4), which will require development associated with site policies A5 and A10 to take place, pedestrians and cyclists will have the option of using the new route adjacent to the railway lines, with buses remaining on the southern section of Walnut Tree Close.</p> <p>In the 'Proposed Submission Local Plan: strategy and sites' itself, we do not consider that it is necessary to show the route of the Sustainable Movement Corridor where it uses land within the highway boundary of adopted local roads, land through the campuses of the University of Surrey, or is reflected in site allocation policies, as it now is in policies A5, A7, A16, A24, A25 and A26 of the Proposed Submission Local Plan. Therefore, the only site allocation policy which includes a map indicating the route of the Sustainable Movement Corridor is Policy A10 Land for Sustainable Movement Corridor Town Centre Phase 2, off Walnut Tree Close, Guildford, which effectively replaces site allocation policy 122 from the 2014 version of the Draft Local Plan.</p>
<p>The principle of safeguarded routes is accepted but the benefit of the movement corridor should aim to benefit from a combined pedestrian and cycle along the river with a bus corridor along GTAMS route</p>	<p>It is not considered that there is a need for an additional pedestrian and cyclist route from Walnut Tree Close to the towpath at this point, given existing nearby connections to the north and to the south.</p>
<p>Should link this route through to Worplesdon Road A322 so can avoid crossing traffic at Wooden Bridge</p>	<p>The Sustainable Movement Corridor: West will pass under the existing A3 trunk road on Egerton Road.</p> <p>The Sustainable Movement Corridor: North will pass under the existing A3 trunk road on the A320 Woking Road.</p> <p>It is not planned that the Sustainable Movement Corridor will use the A322 Worplesdon Road.</p>

123 - Land to the east and south of Four Acre Stables Aldershot Road, Normandy

Issue	Guildford Borough Council Response
Object	<p>We no longer believe that safeguarding is an appropriate option for Guildford. This is discussed further in the Green Belt and Countryside topic paper. Some land at Four Acre Stables is proposed to be inset from the Green Belt, and allocated for four Traveller pitches.</p> <p>Comments in relation to this site allocation and general provision of Traveller accommodation are considered in Planning for sites - Traveller sites.</p>
Green Belt should be preserved	
Exceptional circumstances not demonstrated/ unmet housing need does not constitute very special circumstance	
Guidance is about to change for non-travelling travellers	
No need	
Site not suitable because: <ul style="list-style-type: none"> • Preserves character of Guildford • Flooding on site • Disproportional number of sites in the west • Services can't cope (schools/GP/social services/police/sewage) • Increased traffic on Aldershot Road – access/safety/congestion issues • It would be too large • Impact on SPA and effectiveness on SANG • Worplesdon is already getting a lot of development 	
Occupiers on site have removed existing trees / put up fencing	
Safeguarded land should be adjoining urban areas as more sustainable	
Development would not be permitted for settled community	
Site that was given temporary permission should not be extended / enforcement issues in the past	
Not appropriate to inset traveller sites	

2. Comments on the Glossary

Issue	Guildford Borough Council Response
The SHMA does not account for windfall sites	The SHMA assessed our housing need rather than supply. We have included a windfall assumption as part of our housing supply. See the Land Availability Assessment for more information.
Travellers no longer travel, but are of descent	The definition of travellers has been revised in the Proposed Submission Local Plan, in accordance with Planning Policy for Traveller Sites (2015)
No definition of urban provided	Definition added to glossary of Proposed Submission Local Plan

Issue	Guildford Borough Council Response
Major site- If this constitutes 10-199, what is the name for the large sites GBC would like to see for 200 - 2000+?	Comment noted
Land removed from the greenbelt should be referred to as removal from greenbelt rather than insetting or boundary realignment	The term inset is consistent with the terminology used in paragraph 84 of the NPPF.
Why compare low incomes with median affordability at not low with less expensive housing and median salaries with median priced housing?	This "median" does not appear in the glossary entry for "affordability" Para 4.2.32 of the Proposed Submission Local Plan (Reg 19) explains why affordability is measured for the lowest earners and cheapest housing
Please add "Also where the planning / building issues may cause local flooding, or the inability of the existing surface water drain systems to cope." to Duty to Cooperate.	Flooding is a strategic cross boundary issue. This is discussed further in the Duty to Cooperate topic paper.
The NPPF definition of Green Belt is different to that of the glossary- it is a land use policy not a landscape one. Any impact on the landscape is a secondary product (UoS)	The definition of the Green Belt in the NPPF is referred to in the policy.
Settlement definition should be changed to: A collection of dwellings forming a community, ranging in size from a small number of dwellings grouped together up to large cities of several million inhabitants (UoS)	Agreed
Safeguard definition should be changed to Safeguarded land is land between the urban area and the green belt that will not be developed unless required by a further review of the local plan (UoS)	Agreed
Page 87 - The text should start "Safeguarded land is land allocated for development." "...will not be developed..." should be "...may not be developed..."For improved standard of text, delete only. Insert only before "following".	Definition has been updated for clarity
Sustainable definition should be based on core principles. Ignores most of the NPPF's core planning principles so does not comply with the NPPF.	The definition included in the glossary for sustainable development is widely regarded as the accepted version so is appropriate to use in this context.

3. Comments on Appendix B Infrastructure Schedule

Issue	Guildford Borough Council Response
General	
Critical infrastructure needed to support the planned development should be listed in Appendix 2, but the list has little detail or costing	At that stage, development proposals, infrastructure needs and infrastructure projects were insufficiently progressed to include.
Short on detail particularly to support the development planned that will increase the population of Worplesdon by 70%. The CEO of SCC has stated that £800m is	Public funding is needed to upgrade infrastructure which is currently inadequate.

Issue	Guildford Borough Council Response
<p>required <i>before any new development</i> takes place, just to bring the infrastructure up to date.</p> <p>All new developments should be provided with infrastructure which fully satisfies their requirements</p> <p>Infrastructure improvements needed for Liddington Hall (site 62) and Keens Lane (site 61) for them to be developed</p> <p>Object to plan as infrastructure is already stretched</p>	<p>Planned development, both the strategic sites and the cumulative impact of smaller sites, will place extra pressure on existing infrastructure and will need new or improved infrastructure.</p> <p>The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure to needed support these sites.</p> <p>The IDP will be updated as further detail is available. Developer contributions (including the “pooled” Community Infrastructure Levy) and other funding sources will be used to ensure that key infrastructure is delivered to be available when it is needed.</p>
<p>Support infrastructure planned for strategic sites</p>	<p>We will continue to work with the promoters of strategic sites to secure the infrastructure needed to support these development, so minimising impact on the area.</p>
Transport	
<p>A3 Guildford:</p> <ul style="list-style-type: none"> • Slip roads at the cathedral junction with the A3 and the Tesco roundabout are sub-standard. • Frequent accidents and consequent heavy tail-backs. • Cathedral interchange and the Dennis interchange are heavily congested at peak periods and additional capacity is required. • Widened A3 to three lanes in both directions between Stoke Junction and the A31 Hogs Back junction. • Infrastructure Project 4.1.1 - A3 junctions are listed separately. They should form part of an integrated assessment of the A3 and long term solutions identified. • Build tunnel under Guildford for through traffic. • Improve A3 or make alternative road for locals. • Supports access to Surrey Research Park via A31. 	<p>The schemes that we consider are necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the ‘Proposed Submission Local Plan: strategy and sites’. This includes the following relevant schemes:</p> <ul style="list-style-type: none"> • SRN2: A3 Guildford (A320 Stoke interchange junction to A31 Hog’s Back junction) ‘Road Investment Strategy’ scheme (E31) • SRN8: A3 northbound off-slip lane widening to Tesco roundabout • LRN2: A3/Egerton Road Tesco Roundabout improvement scheme • LRN3: New signalised junction from Blackwell Farm site to A31 Farnham Road (to principally serve Blackwell Farm site) • LRN4: Access road at Blackwell Farm site with through link to Egerton Road (to principally serve Blackwell Farm site) • LRN5: Interventions to address potential highway performance issues resulting from development at Blackwell Farm site
<p>Support the concept of sustainable transport; hope that funding will be made available for real time bus services and improved cycle pathways across borough.</p>	<p>The schemes that we consider are necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the Proposed Submission Local Plan. Schemes BT1, BT2, BT3, BT4, AM2, AM4 and AM5 are relevant to suggestion.</p>
<p>Strongly support sustainable movement corridor to and from Stag Hill.</p> <p>Blackwell Farm would be at one end of the Sustainable Movement Corridor ; it would link and integrate new development with adjacent employment centres and the town centre.</p>	<p>Comments noted.</p>
<p>The Sustainable Movement Corridor is unrealistic; past efforts at sustainable</p>	<p>Comments noted.</p>

Issue	Guildford Borough Council Response
<p>transport package is disappointing (e.g. under-use of park and ride, unsegregated cycle ways) and ineffective, but is still used as justification from more development.</p>	<p>The National Planning Policy Framework states that “The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel. However, the Government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas.” (paragraph 29).</p>
<p>No route is proposed for the Sustainable Movement Corridor on the Proposals Map apart from site 122.</p> <p>Site 122 is insufficient to deliver section 1 (Stag Hill campus to Guildford railway station) of the Sustainable Movement Corridor.</p>	<p>The route sections of the Sustainable Movement Corridor were named in row 2.1.1. As is stated in that row, the Sustainable Movement Corridor is ‘largely along existing roads in the town’.</p> <p>In the ‘Proposed Submission Local Plan: strategy and sites’, the route sections of the Sustainable Movement Corridor are named in Appendix C Infrastructure Schedule. Further definition of the route sections is set out in the Transport Topic Paper (June 2016).</p> <p>In the ‘Proposed Submission Local Plan: strategy and sites’ itself, we do not consider that it is necessary to show the route of the Sustainable Movement Corridor where it uses land within the highway boundary of adopted local roads, land through the campuses of the University of Surrey, or is reflected in site allocation policies, as it now is in policies A5, A7, A16, A24, A25 and A26 of the Proposed Submission Local Plan. Therefore, the only site allocation policy which includes a map indicating the route of the Sustainable Movement Corridor is Policy A10 Land for Sustainable Movement Corridor Town Centre Phase 2, off Walnut Tree Close, Guildford, which effectively replaces site allocation policy 122 from the 2014 version of the Draft Local Plan.</p>
<p>The site 122 section of the Sustainable Movement Corridor will be redundant if Walnut Tree Close is made into two cul-de-sacs.</p>	<p>The ‘Proposed Submission Local Plan: strategy and sites’ sets out phases for the delivery of the Town Centre route section of the Sustainable Movement Corridor. See Appendix C Infrastructure Schedule.</p> <p>With the implementation of Sustainable Movement Corridor: Town Centre Phase 1 (scheme SMC3), which would follow the experimental closure of Walnut Tree Close (with the option of making this a permanent change) as part of the Guildford Town Centre Transport Package (scheme LRN1), pedestrians and cyclists travelling to and from the Stag Hill campus and further afield will be encouraged to use the present Yorkie’s Bridge and then continue southwards towards Guildford railway station via the southern section of Walnut Tree Close.</p> <p>With the implementation of Sustainable Movement Corridor: Yorkie’s Bridge (scheme SMC2), buses will be able to cross the new replacement Yorkie’s Bridge,</p>

Issue	Guildford Borough Council Response
	<p>which also will include provision for pedestrians and cyclists. Pedestrians, cyclists and buses will continue southwards towards Guildford railway station via the southern section of Walnut Tree Close.</p> <p>With the implementation of Sustainable Movement Corridor: Town Centre Phase 2 (scheme SMC4), which will require development associated with site policies A5 and A10 to take place, pedestrians and cyclists will have the option of using the new route adjacent to the railway lines, with buses remaining on the southern section of Walnut Tree Close.</p>
<p>If Site 122 is considered suitable then it is a great opportunity to leave Walnut Tree Close for the benefit of its (and any future) residents.</p>	<p>The 'Proposed Submission Local Plan: strategy and sites' sets out phases for the delivery of the Town Centre route section of the Sustainable Movement Corridor. See Appendix C Infrastructure Schedule.</p> <p>With the implementation of Sustainable Movement Corridor: Town Centre Phase 1 (scheme SMC3), which would follow the experimental closure of Walnut Tree Close as part of the Guildford Town Centre Transport Package (scheme LRN1), pedestrians and cyclists travelling to and from the Stag Hill campus and further afield will be encouraged to use the present Yorkie's Bridge and then continue southwards towards Guildford railway station via the southern section of Walnut Tree Close.</p> <p>With the implementation of Sustainable Movement Corridor: Yorkie's Bridge (scheme SMC2), buses will be able to cross the new replacement Yorkie's Bridge, which also will include provision for pedestrians and cyclists. Pedestrians, cyclists and buses will continue southwards towards Guildford railway station via the southern section of Walnut Tree Close.</p> <p>With the implementation of Sustainable Movement Corridor: Town Centre Phase 2 (scheme SMC4), which will require development associated with site policies A5 and A10 to take place, pedestrians and cyclists will have the option of using the new route adjacent to the railway lines, with buses remaining on the southern section of Walnut Tree Close.</p>
<p>If Site 122 is found to be appropriate, the remaining highway (Walnut Tree Close) should be capable of use for the residents rather than through traffic although The Guildford Society is unconvinced of the rationale for making the road into two cul-de-sacs and is not aware of any qualitative or quantitative data to support such a plan.</p>	<p>We propose that with the implementation of both Sustainable Movement Corridor: Yorkie's Bridge (scheme SMC2) and Sustainable Movement Corridor: Town Centre Phase 2 (scheme SMC4), the latter which will require development associated with site policies A5 and A10 to take place, pedestrians and cyclists will have the option of using the new route adjacent to the railway lines, with buses remaining on the southern section of Walnut Tree Close.</p> <p>Some pedestrians and cyclists travelling this route would likely continue to use the southern section of Walnut Tree Close.</p>

Issue	Guildford Borough Council Response
	<p>In summary, we consider that it would be appropriate for residents and other occupiers of the southern section of Walnut Tree Close to share this local road with buses, pedestrians and cyclists.</p> <p>With the experimental closure of Walnut Tree Close (with the option of making this a permanent change), through general vehicular traffic will not be catered for.</p> <p>The case for the experimental closure of Walnut Tree Close (with the option of making this a permanent change) has been made by Surrey County Council. For example, see item 9 Guildford Town Centre Transport Package at 8 December 2015 meeting of the Guildford Local Committee.</p>
<p>Sustainable Movement Corridor: Section 4 – Friary Centre/North Street regeneration site to Spectrum leisure complex: The use of Woodbridge Road seems to be wishful thinking and no study has been reported that would identify the impact on traffic.</p> <p>The design of the North Street development (Site 20) has not been finalised and so there is no clarity as to how this link will take place.</p> <p>How will Ladymead accommodate the Sustainable Movement Corridor?</p>	<p>The study by Cairns, Atkins and Goodwin (2002) on ‘disappearing traffic’, which assessed the evidence from case studies of the traffic impact of highway capacity reductions, found that ‘well-designed and well-implemented schemes to reallocate roadspace away from general traffic can help to improve conditions for pedestrians, cyclists or public transport users, without significantly increasing congestion or other related problems.’</p> <p>However, as the above study noted, ‘all schemes are different, and each will need to be considered according to its own circumstances’. Accordingly, further feasibility and design work for the Sustainable Movement Corridor is ongoing and planned.</p>
<p>Sustainable Movement Corridor could exist across the town centre and the corridor could in due course be configured in a star shape to provide wider access from across the borough. This would make a much more meaningful long term modal shift but would probably require longer than a single plan period to deliver.</p>	<p>Comment noted.</p>
<p>Evidence for the Sustainable Movement Corridor is extremely weak. There has been no cost-benefit evaluation of the cost of £75-100m.</p>	<p>The Council has undertaken further study work since 2014 on the Sustainable Movement Corridor, and further feasibility and design work is ongoing and planned.</p>
<p>The Town Centre bus corridors should be defined in the Guildford Sustainable Transport Package.</p>	<p>Surrey County Council’s proposed Guildford Sustainable Transport Package and Guildford Gyratory Package have been merged into one package, the Guildford Town Centre Transport Package, with the agreement of the Enterprise M3 Local Enterprise Partnership, the primary funder. See paragraph 1.3 in item 12 Guildford Town Centre Transport Package at 30 September 2015 meeting of the Guildford Local Committee.</p> <p>The schemes which comprise the Guildford Town Centre Transport Package are named in the Proposed Submission Local Plan at Appendix C Infrastructure Schedule.</p>

Issue	Guildford Borough Council Response
<p>A fully rational bus routing system for the town centre must be planned, together with proper interchange facilities.</p> <p>Need covered bus station in the town centre.</p> <p>Should include reference to the proposed plans for the redevelopment / relocation of Guildford bus station.</p> <p>Vast majority of existing bus passengers want to access the town centre, not Guildford railway station. Do not move bus station from town centre to rail station.</p> <p>Buses need to be synchronised with trains and suggests integrated bus and rail station.</p> <p>Open up Onslow Street side of Friary Centre, incorporate covered bus stands with seating directly into the shopping, as a similar in Newcastle upon Tyne. Perceived difficulties of 'management' should not lead to degraded facilities for bus passengers. Oxford's main bus stop area is in the street; resulting in an unpleasant jumble of buses and desperate passengers.</p>	<p>Bus services in the borough and beyond are operated by a number of bus operators, the principal operators being Stagecoach, Arriva and Safeguard. Bus operators run many commercial bus services at their own financial risk. Surrey County Council works in partnership with operators to deliver improvements to their services. Surrey County Council also commissions socially-necessary bus services.</p> <p>Surrey County Council, as the Local Transport Authority and the Local Highway Authority, as they develop schemes for the local road network in the town centre, will have regard to the routing of existing and potential future bus services in so doing.</p> <p>The 'Proposed Submission Local Plan: strategy and sites' sets the following context for future decisions by bus operators and Surrey County Council on the routing of bus services in Guildford town centre:</p> <ul style="list-style-type: none"> • Site allocation policy A6: North Street redevelopment, Guildford. This includes requirements as to the future provision of bus interchange facilities • Site allocation policy A7: Land and buildings at Guildford railway station, Guildford. This includes requirements as to the future provision for buses • New Guildford town centre bus facilities (scheme BT2) in Appendix C Infrastructure Schedule • Sustainable Movement Corridor schemes (schemes SMC1, SMC2, SMC3, SMC4, SMC5 and SMC6) in Appendix C Infrastructure Schedule. These will provide the opportunity for rapid and reliable journeys by bus along the route, or part of the route, of the Sustainable Movement Corridor in Guildford town centre.
<p>Unsure why there was only one improvement in pedestrian access between the station and the town centre when so much more needs to be done (noting, for example, the Allies & Morrison and Guildford Vision Group aspirations).</p>	<p>The schemes that we consider are necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the Proposed Submission Local Plan.</p> <p>Scheme LRN1 Guildford Town Centre Transport Package, which is included in Appendix C Infrastructure Schedule of the Proposed Submission Local Plan, comprises various schemes including the replacement Walnut Bridge scheme, to provide a wider structure to cater for higher flows of pedestrians plus usage by cyclists.</p> <p>Other suggested pedestrian improvements that are not considered necessary for the delivery of the draft Local Plan, may be progressed by the Council and/or its partners outside of the Local Plan process.</p>
<p>The Council is putting undue expectations that there will be a significant modal shift to sustainable modes of transport as a means of solving the major transport</p>	<p>We do not consider that undue emphasis has been placed on improving sustainable transport modes in the urban area of Guildford.</p>

Issue	Guildford Borough Council Response
problems of the town.	The NPPF states that 'The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel. However, the Government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas' (paragraph 29).
Sustainable transport schemes do not provide mitigation for new development, given that past schemes have been ineffective e.g. under-utilised Park and Ride facilities, on-road cycle lanes blocked by parked cars.	<p>Comment noted.</p> <p>ONS Census data for the travel to work journey by residents of Guildford borough shows an absolute increase in the use of sustainable modes and a reduction in the use of cars between 2001 and 2011.</p> <p>The NPPF states that 'The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel. However, the Government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas' (paragraph 29).</p>
Unless the Plan is modified to incorporate specific proposals, the reality is that nothing of any significance will be done and quality of the environment will get worse.	The Council has engaged closely with the key transport infrastructure and service providers, and key funders, in order to build support for a programme of transport schemes. The schemes that we consider are necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'.
Stoke interchange particularly difficult for cyclists.	The schemes that we consider are necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'. Scheme LRN1 is relevant.
<p>There should be provision for improvements to cycling facilities, as far as possible segregated from vehicles.</p> <p>Cycle ways separate from roads should be make throughout the borough. Safer for cyclers and stops them form slowing down traffic.</p> <p>Painting lines on the road does not equal cycle lanes.</p>	The schemes that we consider are necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'. Schemes AM2, AM4 and AM5 are relevant.
Question deliverability of the new proposed stations : available land, financial viability, traffic	Further study work has been undertaken and commissioned in respect of the proposed Guildford West (Park Barn) and proposed Guildford East (Merrow) railway stations. There has been engagement with Network Rail, train operators and land owners regarding both proposed stations.
Park and ride do not work. Most traffic is travelling through Guildford.	We consider that Park and Ride is part of the mix.
Hospital parking and traffic issues, needs one way system.	Comments noted.
Supports Guildford Vision Group's proposal for a new bridge and road	
A future outer by-pass of Guildford would be precluded if the proposed Blackwell	The schemes that we consider are necessary for the delivery of the draft Local Plan

Farm site is fully developed	are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'.
Need for investigation of a Guildford alternative to conventional buses, Personal Rapid Transit (PRT) comprising driverless "cars" running on elevated tracks between multiple points, reducing conventional car usage and replacing a multiplicity of buses. Such a network could connect Guildford railway station, the University, the Cathedral, the RSCH, park-and-ride, Sports Park, Research Park and Manor Park residences and beyond.	We do not consider that these suggested schemes are necessary for the delivery of the draft Local Plan.
Access to Slyfield Industrial Estate/SARP should be from the A3.	
New dedicated cycle routes such as the A3 crossing at the Wooden Bridge.	
New cycleway link between the existing bridge over the A3/A25 and Yorkie's Bridge at Walnut Tree Close.	
Need better transport access to airports to help businesses.	Comment noted.
Why are Chertsey Street / North Street and Shalford zebra schemes included?	Not included in Appendix C Infrastructure Schedule of the 'Proposed Submission Local Plan: strategy and sites'.
Blackwell Farm site new road access to the A31 to west of Guildford – implies a major traffic route through the supposedly large residential community which we consider to be unacceptable. Would not support a major junction on the A31 involving grade separation, 24-hour lighting and a major adverse impact on the Area of Outstanding Natural Beauty. May be essential to the development due to the inability of the present approach from the east (Gill Avenue) to take extra traffic	Form of this access road has been changed for 'Proposed Submission Local Plan: strategy and sites' See scheme LRN4 in Appendix C Infrastructure and site allocation policy A26.
Rail Halt proposed seems to be in the wrong place, distance to Tesco from the location indicated is almost the same distance as Tesco from the town. We believe the optimum location would be near the RSCH or the Egerton Road Bridge.	New rail station proposed to be in Park Barn in 'Proposed Submission Local Plan: strategy and sites'. See scheme NR2.
No details of potential remedies to the problems of the A323 are included apart from improving the links with the Hogs Back.	Comment noted.
Need to improve intersections at South Lane and the A323 and Foreman Road and the A323 which will be impacted by development proposals on Site 56.	'Proposed Submission Local Plan: strategy and sites' Site allocation policy A30 proposes to allocate land for a new road bridge and footbridge to enable the closure of the level crossing on the A323 Guildford Road, adjacent to Ash railway station. Also included as scheme LRN21 in Appendix C Infrastructure Schedule.
Strategic site development is to some extent inevitable but no information is provided here about improvements to transport infrastructure, including proposed access to the site and consideration of impact of already congested roads in Merrow and Burpham.	See schemes SRN4, LRN6, SMC6 and NR3 in Appendix C Infrastructure Schedule in 'Proposed Submission Local Plan: strategy and sites'.
B3411 Vale Road, Ash Vale – should include junction of Vale Road/ Lakeside Road, where a full width railway bridge is required to allow tow way road traffic	Comment noted.
Better access needed from Stoughton and Stoke into town centre, particularly to support Slyfield development.	See scheme SMC5 in Appendix C Infrastructure Schedule in 'Proposed Submission Local Plan: strategy and sites'.

Issue	Guildford Borough Council Response
Park and Ride scheme at Blackwell Farm site is confusing given the existing Onslow Park and Ride nearby.	Not included in Appendix C Infrastructure Schedule of the 'Proposed Submission Local Plan: strategy and sites'.
Potential remedies to the problems of the A322 Worplesdon Road needed.	Comment noted.
No clear vision as to how North / South route through Guildford town centre will be eased	Comment noted.
A major development is needed for the A3/A31 junction, making use of the local topography, It would reduce the load on the A3 between the A31 and the Cathedral junction.	See scheme LRN14 in Appendix C Infrastructure Schedule in 'Proposed Submission Local Plan: strategy and sites' .
Available funding should be used for projects deliverable in the short term such as management and control improvements.	Comment noted.
Rollout of Wayfinding signage system, and new cycle route schemes and bus stop accessibility works through Local Sustainable Transport Scheme is ongoing and should not be included.	<p>Comment noted.</p> <p>Guildford Wayfinding signage system – Phase 2 is scheme AM1 in Appendix C Infrastructure Schedule of the 'Proposed Submission Local Plan: strategy and sites'.</p> <p>Other schemes removed.</p>
Direct access from the A3 to the Onslow Park and Ride is needed to encourage use of underused facility and direct traffic away from the Tesco roundabout.	<p>Comment noted.</p> <p>Highways Agency has previously rejected this proposal.</p>
Notes that scheme 5.1.3 should be expanded to 'facilitate the closure of Beechcroft Drive / A3 junction'.	See scheme SRN7 in in Appendix C Infrastructure Schedule in 'Proposed Submission Local Plan: strategy and sites'.
<p>Support new Clay Lane Link Road.</p> <p>Object to Clay Lane Link Road.</p> <p>Various suggestions about connections of Clay Lane Link Road to A320 and A3.</p>	<p>Comments noted.</p> <p>The Clay Lane Link Road scheme is considered not to be a key infrastructure requirement on which the delivery of the 'Proposed Submission Local Plan: strategy and sites' depends.</p>
<p>Support for Northern Park and Ride scheme.</p> <p>Object to Northern Park and Ride scheme.</p> <p>Suggests a Park and Ride facility as part of the Liddington Hall site (Site 62) and also at Slyfield (Site 63 and also the Clay Lane Link Road) where there should be a link to an all-direction junction at Burpham.</p> <p>Object to no new Northern Park and Ride sites proposed for allocation from the five considered at last consultation.</p> <p>No location for Northern Park and Ride and no justification of need.</p>	<p>Comments noted.</p> <p>Five potential sites for a Northern Park and Ride site were set out in Guildford borough Local Plan Strategy and Sites Issues and Options (October 2013). There was no site allocation for a Northern Park and Ride facility in the 'Draft Guildford borough Local Plan: strategy and sites' (July 2014) and there is no site allocation in the 'Proposed Submission Local Plan: strategy and sites'.</p> <p>A Northern Park and Ride scheme is considered not to be a key infrastructure requirement on which the delivery of the 'Proposed Submission Local Plan: strategy and sites' depends.</p> <p>At this time, we do not consider that there is a strong business case for a Northern</p>

	<p>Park and Ride scheme. Nevertheless, a Northern Park and Ride scheme is an 'aspirational' scheme in the Council's Guildford Borough Transport Strategy (April 2016). An 'aspirational' status has been defined as 'A strong business case will need to be demonstrated in order to secure funding as the estimated cost presently exceeds typical funding envelopes and/or there are significant planning and statutory approvals to be achieved.'</p>
Support a new rail station at Park Barn	<p>The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. Several schemes are included that will improve access to Guildford and London Road (Guildford) railway stations including LRN1, SMC1, SMC2, SMC3, SMC4, SMC5, SMC6, BT1, AM1, AM2 and AM3. Two new rail stations will also be delivered at Guildford West (Park Barn) and Guildford East (Merrow), respectively schemes NR2 and NR3.</p>
Support a new rail station at Merrow	
Guildford is a commuter town; access to the stations for commuting is vital.	
No evidence of planned increase in train frequency	<p>Network Rail's Wessex Route Study (August 2015) proposes a strategy which will address the challenge of accommodating projections for growth in demand for rail services to 2043, including demands arising and impacting on rail services in Guildford borough. A significant increase in rail capacity serving Guildford borough, primarily delivered through increases in the frequency of rail services, is anticipated in the period to 2043.</p> <p>The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'. This includes several schemes that will increase rail capacity in Guildford borough including NR12, NR2, NR3, NR4, NR5 and NR6.</p>
Support school buses.	Comment noted.
Other transport infrastructure and service comments.	Please refer to the table for the Comments on Policy 17 Infrastructure and delivery.
Non-transport	
<p>Waste water infrastructure : emphasis is firmly placed on the developer. Consequently no admission that the current system is not fit for purpose.</p>	<p>Thames Water is responsible for the sewerage infrastructure in the whole borough. It has advised that it has limited powers to prevent connection to its network ahead of infrastructure upgrades.</p> <p>Thames Water has advised us that in many situations, a negatively worded condition will suffice, with development not being able to be occupied until any necessary upgrades to the waste-water infrastructure have been completed. Alternatively phasing of larger developments can be used to ensure infrastructure upgrades are provided before development is occupied.</p>

	In certain circumstances, generally for larger developments and in areas with little capacity, developers will be expected to carry out appropriate studies to determine whether their developments would overload the system.
<ul style="list-style-type: none"> • Need additional primary school places in Guildford town, where all the schools are reaching capacity. Current school expansions to accommodate this. • SCC and GBC will co-operate to find new sites for potentially two primary schools; one to the west of the town and one on the outskirts of the town centre, in addition to those planned for Gosden Hill Farm, Blackwell Farm, the former Wisley Airfield and the SARP site • Secondary schools will be under pressure from the recent rise in birth rates from around 2017. Planned housing will add to pressure; at least one new secondary school will be needed to support this. • SCC officers have undertaken initial assessment of the two sites included in Appendix B for new secondary schools, and have transport and ecological concerns. • SCC will continue to co-operate with GBC to explore whether there are preferable sites to ensure that any new schools are located on suitable land near to the communities that they are intended to serve 	<p>SCC officers are working with borough council officers and are liaising with other neighbouring authorities (borough and county level) to determine the additional need for school places that will be required to support the spatial development strategy.</p> <p>Details of school expansions and new schools are included in the revised Infrastructure Schedule.</p>
Add a through-primary school planned by Guildford Diocese Education to replace the current separate Send First School and St. Bede's Junior School to the schedule	We have considered this project (planning permission 16/P/00033), which will result in improved buildings, but as it would not provide increased capacity, we have not included it.
An inspector may consider that Guildford have not adequately assessed Best and Most Versatile Agricultural Land (BMVAL) and may find the Local Plan unsound.	We have had a desktop survey undertaken to consider soil quality for sites we that we consider we had insufficient information for. We have taken this into account in selecting sites to include in the new Local Plan.
3.3.2 Ash Vale South Flood Risk Reduction - Add Wharf Rd, Chandlars Rd, Foxhurst Rd, Mulberry Close	This area was not found to be a hotspot for surface water flooding.
Effingham is not identified in the Infrastructure Schedule as requiring flood reduction measures but experiences surface water flooding around Effingham Lodge Farm	This area was not found to be a hotspot for surface water flooding.
Object to proposed secondary school at West Clandon due to - <ul style="list-style-type: none"> • dangerous location • site access • no street lighting • single side and narrow footpaths 	Further assessment has found this site to be unsuitable in relation to access and highways safety. This site is no longer included for development.
Object to proposed secondary school at Salt Box Road due to <ul style="list-style-type: none"> • highways safety 	Further assessment has found this site to be unsuitable in relation to access and highways safety. This site is no longer suggested for development.
New secondary school better located near to planned development at: <ul style="list-style-type: none"> • Merrow Depot (if a new train station is built at Merrow and Gosden Hill Farm is developed), or • Burnt Common warehouse, or • Wisley, or 	We have been working closely with Surrey County Council School Commissioning Service and Highways Authority to identify the most suitable location where new secondary schools could be provided. The latest draft Local Plan includes plans for three new secondary schools in the borough over the plan period. All sites considered are included in the Land Availability Assessment (LAA).

<ul style="list-style-type: none"> • West Horsley • Gosden Hill 	
<p>Question siting of schools on green belt given school closures over last decade and Pond Meadow school lying deserted</p>	<p>The proposed sites were to be on land where the current green belt designation was to be removed.</p>
<p>The Howard of Effingham proposed redevelopment is not included in the Infrastructure Schedule</p>	<p>The redevelopment of the school was suggested to improve the quality of the school buildings rather than to increase capacity of the school (although two additional form of entry would have been created, one for the related housing development itself). The site was proposed to be inset from the Green Belt.</p>
<p>No proposal to expand Ash Manor secondary school.</p> <p>Ash Manor currently takes children from across the border in Hampshire, but as the admissions criteria is currently based on distance this could result in problems for children living in the East of the Ash and Tongham / Normandy area</p>	<p>There will be a gradual impact in Ash/Tongham within the first three years of the plan but SCC does not anticipated to be significant. SCC officers are carefully monitoring requirement for one additional form of entry in this area, with viability studies undertaken to assess potential to expand local schools. The cross-over movement with Hampshire will also be taken into account.</p>
<p>The schedule should include a reference to the CRC/WTS upgrade or alternative waste infrastructure at Slyfield</p>	<p>This infrastructure project is now included in the draft Infrastructure Schedule</p>
<p>An application has been submitted to central government to develop a University Technical College in Guildford to support the local economy's demand for a technically skilled workforce, as outlined in the Enterprise M3 Skills Strategy. If successful, this could benefit from link to the proposed new rail station at Park Barn</p>	<p>The UTC has been agreed and given central government funding. It will benefit from this new station, particularly as it will have a wide catchment, stretching from London to Sussex.</p>
<p>The schedule should include a reference to the allocated and approved strategic waste management facility at the former Wisley airfield.</p>	<p>The landowner has advised that it will not make land available for a waste facility on this site. In the absence of Surrey County Council Compulsorily Purchasing (CPOing) the land to deliver a waste facility here, a facility will not be provided.</p>
<p>the Infrastructure Schedule attached at Appendix B of the Plan does not include any Surrey Police infrastructure that is needed to support new development</p> <ul style="list-style-type: none"> • Principle of including police as infrastructure providers, can be included in Community Infrastructure Levy (CIL) 123 list • Infrastructure needs of Surrey Police are based on population. • To quantify the impact of strategic growth on the policing operations of Surrey Police, a baseline assessment has been undertaken for the Guildford Borough to identify the current costs of providing an appropriate level of policing and community safety. This has been costed based on crime rates and population data available, and Surrey Police costs for providing a comprehensive policing service. This information has then been used to project the infrastructure costs resulting from policing an increased population, based upon the anticipated housing set out in the Draft Local Plan. • Funding allocated and available to police forces is generally insufficient to fund new facilities required as a result of growth. Police forces are therefore having to supplement budgets with alternative local funding sources. Given that policing infrastructure is required to serve and support new development, as evidenced 	<p>In preparing the Infrastructure Baseline 2013 to support the first formal stage of the local Schedule, Surrey Police had advised us that the current police station and facilities in Guildford are adequate.</p> <p>It is helpful to be able to consider Surrey Police's future needs (based on the draft Local Plan populations) in advance, so we can plan for future needs.</p> <p>CIL cannot be used to cover staffing, IT, etc costs, as they are not considered to be within the definition of infrastructure for CIL purposes. However, we have included both accommodation / facilities for police service needs and CCTV in the draft CIL regulation 123 list. We will be consulting again on the draft CIL proposals for the</p>

<p>above, and this can be funded through mechanisms within the planning system, these mechanisms are now being actively pursued and considered as a funding source to support the needs of future development.</p> <ul style="list-style-type: none"> • There will be adoption of flexible working practices, with a subsequent capital cost for IT and equipment, to ensure that police staff and officers remain highly visible in the local communities in which they work. • There may be a medium to longer-term need to provide additional space within any adapted or re-provided Guildford Police Station, to ensure that these staff and necessary equipment can be accommodated. • There will also be the need for a satellite neighbourhood policing post, based at or near the former Wisley airfield development, in order to support this large development which is located in an outlying location from the existing Guildford Police Station. 	<p>borough, and welcome your involvement.</p>
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4. Comments on Appendix C Evidence Base

Issue	Guildford Borough Council Response
<p>The Housing number is too high/SHMA/Population projections</p>	
<p>Students should not be a consideration for housing</p>	<p>Paragraph 159 of the NPPF states that the SHMA needs to address the need for all types of housing, including affordable housing and the needs of different groups in the community. For Guildford this includes the needs of students.</p>
<p>A new, revised SHMA has not yet been published so we are unable to comment. The plan should not be based on a draft SHMA.</p>	<p>The SHMA was in draft form as we were awaiting the latest projections. The final West Surrey SHMA has now been published and informs the Proposed Submission Local Plan.</p>
<p>The SHMA uses out of date ONS data – 2011 data, when 2012 data is available. The SHMA does not make this clear.</p>	<p>The final West Surrey SHMA uses the latest 2012 population and household projections.</p>
<p>The housing number is being driven by a high jobs figure. There is no evidence that this number of extra jobs is needed</p>	<p>The draft SHMA used Experian projections to assess future jobs growth. The final West Surrey SHMA uses an average growth rate of the following</p> <ul style="list-style-type: none"> • Cambridge Econometrics Employment Projections, 2015 (Cambridge Econometrics) • UK Local Market Forecasts, 2015 (Experian); and • Local Authority District Forecasting Model, 2015 (Oxford Economics) <p>Each of the forecasts represents a valid means of projecting employment growth. Using a mean of all three is therefore likely to represent the most robust and appropriate figure upon which to base the OAN.</p>

The evidence does not take account of changes from office to residential	Any new dwelling gained through changes in Permitted Development will be counted in our supply.
The evidence does not take account of windfalls, the reuse of empty housing, unimplemented permissions	The SHMA determines our OAN. Whilst our Housing Strategy seeks to maximise opportunities to bring empty homes back into use this is unlikely to yield large numbers. In 2013, there were only 470 long-term empty homes in the borough. Any unimplemented permissions are counted towards our supply where there is a reasonable prospect that they will be delivered. Given the LAA now only includes sites of 5 or more homes we will be including a small site windfall trend in our supply calculations.

Draft

Housing need is driven by student number growth and net international migration – this rate is unlikely to continue to occur (tuition fees/immigration policy)/ they are temporary / should not include international migration / The latest projections from the Government predict that there will be no growth arising from natural change and net internal migration

The NPPF requires that our assessment of housing need takes account of migration. University expects an increase in international students in the coming years, which we must take account of in assessing future need. We can only consider the evidence that is available and cannot predict what future changes in Government policy may be. We will continue to update the SHMA as and when new evidence becomes available.

Whilst international migration is a significant proportion of our projected growth it is not possible to simply remove a component of population change and continue to rely on the figures in the remaining components of population change as this does not acknowledge the relationship between them. This is particularly the case between international and internal migration patterns.

Guildford's population is expected to grow much more strongly for younger age groups than the national population (younger than 29 age group) and generally weaker for older age groups. Younger age groups are much more likely to be mobile (i.e. migrate outside of Guildford) than older age groups. The effect of this type of population change means that our population is growing in the age groups that are more likely to migrate at a greater rate than nationally. This means that Guildford's level of out-migration is also expected to increase by a higher proportional amount thus reducing the level of population growth and associated housing need.

The SHMA at Figure 17 and Figure 18 sets out the age groups of those people that have in the past migrated into Guildford from elsewhere in the country and internationally. There is clear spike in the 18 year group for internal in-migration whereas there is a bigger spike for international in-migration occurring between the late teens and mid-twenties age group. The greater comparative growth in younger people in Guildford is therefore being principally driven by international in-migration. Given this is the age range that is more likely to migrate out of the borough either internally or internationally, a greater increase in this age range results in a greater comparative growth in the level of out-migration that is projected.

It is for these reasons that one cannot state that the growth is due entirely to international in-migration because without this element of growth, Guildford would not see the level of internal out-migration that is forecast to occur.

A SHMA that did not include international migration would not define our full objectively assessed housing need and would therefore not be considered robust or sound by a planning inspector. The level of international in-migration is a function of what makes Guildford and is due to factors such as the Royal Surrey County Hospital, University of Surrey and Surrey Research Park.

<p>International migration over estimated</p>	<p>International out-migration from Guildford in the past may have been underestimated. However looking at migration and age structure trends in the 2012-based SNPP there is strong evidence of reality in the ONS data. In particular, the projection would suggest that many international in-migrants become internal out-migrants. This is demonstrated in the fact that whilst there is a 'bulge' in the key age group of international migrants (20-24 age group), this is not carried through the population five years later suggesting that they are projected to move out of the area (whether international or internal moves). This is in contrast to previous projections (such as the 2011-based SNPP) which showed this bulge moving through the population.</p> <p>International migration is an influence on population dynamics in the Borough. ONS has implemented improvements to International Passenger Survey including changes to sampling and questions which improve understanding of whether or not international students remain in the UK after the period of Study and this has fed into data used in the SHMA. It is not however just the International Passenger Survey which is used to derive international migration statistics. The international migration statistics take account of data from:</p> <ul style="list-style-type: none"> • Department for Work and Pensions (Labour Market Data) • Home Office (Visa and sponsorship data) • Department for Health (Patient Registration Data) • BIS (Further Education Learner data) • Higher Education Statistics Agency (Student Records). <p>These data sources are used to model and distribute international migration to local authorities. The ONS data is the only information available.</p>
<p>Insufficient work has been done on capacity/constraints</p> <p>The projected level of population growth does not support the high level of housing need identified</p>	<p>The SHMA must assess full housing need. It is for the Local Plan to consider whether this level can be accommodated given constraints.</p> <p>The housing need is calculated on the basis of headship rates (the propensity of certain age groups to form new households). The housing need is therefore dependant on both the total population growth and the age structure of the population.</p>
<p>There is no suppressed demand as over occupancy levels have remained the same and the SHMA accepts that the housing need was met by 322 per annum/ OAN higher than previous target/other authorities</p>	<p>The previous target was based on the former South East Plan. The figure of 322 was based on the level of growth that could be accommodated in the borough with no Green Belt release. It therefore represents a constrained figure rather than our objectively assessed need. National policy and guidance requires that we understand our full need and then seek where possible to meet that need as part of determining our housing requirement.</p>

<p>The assumption of 20% population growth is too high and not realistic given past growth rates/ national population growth</p> <p>Immigration levels are unlikely to follow the last 5 years as GL Hearn state that this was driven by rapid EU expansion / Should use 10 year migration rather than 5 years</p>	<p>The final West Surrey SHMA indicates a 15% increase in population between 2013 and 2033. This represents a 0.8% annual population growth which is comparable with the 0.9% population growth that occurred between 2003 and 2013.</p> <p>The final West Surrey SHMA includes a sensitivity analysis with differing assumptions relating to migration rates, one of which was a 12-year trend. This actually shows a higher level of need in Guildford however this approach is not considered to be robust as it does not take account of changes that have occurred since to the age structure of the population.</p> <p>It is useful to note that the overall scale of population growth implied by the 2012-based Sub-National Population Projections is in fact lower than that which has been seen in past trends. ONS data shows annual population growth of 1,438 persons per year between 2004-14, and a higher 1,875 persons per year between 2009-14. This is based on population estimates adjusted for Census data. Set against these figures, the 2012 ONS Sub-National Population Projections expect future population growth to 2033 of a significantly lower figure of 1,102 persons per annum. This does not point to these projections over-estimating population growth in the Borough.</p>
<p>The university predicts “only modest growth” which does not tally with the SHMA</p>	<p>The University predicts to increase its total student population by 3,300 in the next 10 years up to a maximum of 6,300 by 2033.</p>
<p>University growth is not agreed</p> <p>Housing numbers should reflect local need only, not demand/London/migration</p> <p>Calculations are not transparent</p> <p>The SHMA suggests that there has been under-delivery against need. However, if you look at a 10 year timeframe, completions exceeded need for much of that period.</p>	<p>The growth aspirations of the University of Surrey are dependent upon the proposals already secured through their extant planning permission. We cannot control their numbers growth so long as they work within this permission.</p> <p>The calculation of OAN must include demand. The NPPF states at paragraph 159 that the SHMA <i>caters for housing demand and the scale of housing supply necessary to meet this demand</i></p> <p>The SHMA has been prepared in accordance with the NPPG. This states that the ONS population and CLG household projections form the starting point. The West Surrey SHMA determines that these projections both form a reasonable basis for assessing need for Guildford. These figures and the assumptions underlying them are all publicly available. The way in which the jobs growth has been assessed is clearly set out in Appendix F and the assumptions linked to double jobbing, employment rates and commuting are all included in the SHMA. All data used has been clearly sourced.</p> <p>The Monitoring Report assesses delivery of housing. We do not currently have a housing target in an up to date development plan, therefore planning applications and the five year housing land supply are assessed against the need identified in the SHMA. This figure has not been delivered to date.</p>

Should not use 2011 as a start date / should use the start of the 15 year plan period	The plan start needs to represent that the base date identified in the SHMA as this is the point in time from when the OAN is calculated. The final West Surrey SHMA is base dated 2013. If appropriate we may rebase the SHMA as and when new data is published.
The housing number is the result of trend analyses and projections based on data components that are aggregated for analysis rather than treated segmentally	NPPG states that population and household projections should form the starting point for assessing need. Birth rates have little impact on overall housing numbers due to very few of those being born becoming an independent household during the plan period. Death rates have remained fairly consistent over the past few decades. For this reason the analysis of whether the projections are a robust starting point focuses mainly on migration trends.
Conclusions are not based on reliably researched prime local data but on broad secondary sources.	NPPG states that we should avoid expending significant resources on primary research and instead rely predominantly on the use of secondary data.
The draft SHMA asks for higher development to address affordability. There is no evidence provided that building higher numbers would improve affordability	NPPG nevertheless requires us to consider an uplift where the evidence indicates that there are affordability issues.
Projections need to be done frequently and the plan needs to be flexible	NPPG states that wherever possible, local needs assessments should be informed by the latest available information. The National Planning Policy Framework is clear that Local Plans should be kept up-to-date. A meaningful change in the housing situation should be considered in this context, but this does not automatically mean that housing assessments are rendered outdated every time new projections are issued.
<p>The SHMA is subjective / methodology flawed</p> <p>The conclusion undermines the overall analysis by highlighting apparently definitive numbers without recognising that other interpretations of the data could show a different outcome. In particular, there is no justification of increasing the target to 800 homes pa as being able to “support improvements in affordability” given that the preceding paragraph 8.23 highlights that no one knows what level of supply would have an impact on market pricing.</p>	<p>The Government’s National Planning Practice Guidance is clear that the 2012-based Household Projections provide the starting point for assessing housing need. These are based on the 2012-based Sub-National Population Projections. These are official statistics. The household projections produced by the Department for Communities and Local Government are statistically robust and are based on nationally consistent assumptions. Any local changes would need to be clearly explained and justified on the basis of established sources of robust evidence. The West Surrey SHMA has critically appraised both the population and household projections to ensure that they are sound and did not find that there was a reason to depart from the official projections.</p> <p>The final West Surrey SHMA uses a different methodology for calculating the level of uplift for affordability. This is based on the level of additional housing which would be necessary to return household formation rates of those aged 25-34 (the age group most affected by affordability pressures) to 2001 levels by 2033.</p>

<p>The ratio of price to earnings does not reflect the reality of how people buy houses: people look at what they can afford in terms of mortgage payments as a portion of their income. The draft SHMA states that by this measure, the borough is as affordable as it was in the late 1990s. This contradicts later findings in the SHMA.</p> <p>The draft SHMA at 8.15 should show the impact on new housing need of the estimated 243 lettings pa in the private rental sector to households supported by Local Housing Allowance (this reduces the need at GBC's 35% threshold to 369 pa, including the development pipeline).</p>	<p>NPPG states that assessing affordability involves comparing house costs against the ability to pay; the ratio between lower quartile house prices and the lower quartile income or earnings can be used to assess the relative affordability of housing. The final West Surrey SHMA includes analysis on house prices, affordability and supply. This indicates that entry level house prices are 11 times the typical earnings of younger households. This is considerably higher than ratios in the late 1990s which were about five times.</p> <p>Whilst the Private Rented Sector plays an important role in helping to meet the needs of households who require financial support, it is not a genuine affordable housing product and we therefore still need to understand what the affordable housing need is. The uplift for affordability reasons will help support enhanced affordable housing delivery.</p>
<p>If the SHMAs accurately reflect the real housing situation, it would be reasonable to expect that this lack of completions would have a major impact on the housing pressure in Guildford. However, GBC's housing register has been static at about 3,700 since 2008, indicating that the relatively low level of completions is not having a major adverse effect on those most in need.</p>	<p>Whilst the Housing Register has remained fairly constant this is due to the way in which the Register is managed (encouraging those on the lower two bands not to join) rather than a perceived reduction in the need for affordable housing.</p> <p>Meeting existing priority need requires a significant provision of housing. In the future, the pressure will increase on affordable housing due to:</p> <ul style="list-style-type: none"> • Reductions in affordable housing stock due to Right to Buy and sale of council homes to fund the housing association Right to Buy • Welfare reform/benefit caps meaning fewer people can afford to rent in the private sector • Increasing rents and house prices
<p>If there had been suppression of household formation in recent years, then this would be reflected in over-crowding statistics, but para 2.34 suggests that while overcrowding in Guildford has risen, it has done so less than the South East region. Guildford has a high student population and HMOs.</p>	<p>The final West Surrey SHMA acknowledges that the growth in overcrowding and HMOs is below wider comparators however there has nevertheless been an increase of 19% and 10% respectively (2001-2011). Paragraph 7.42 does also acknowledge that in reality there are likely to be higher proportions in Guildford due to the student population. This is only one factor in determining whether an uplift should be applied for affordability reasons.</p>
<p>The draft SHMA table 22 presents a theoretical figure of 59% of newly forming households being unable to afford housing. This makes little sense in reality, as most of these households would simply not form if they could not afford to live anywhere.</p>	<p>Affordable housing needs are calculated using the Basic Needs Assessment Model, in accordance with the NPPG.</p>
<p>Para 2.73 shows the Experian forecast that jobs will increase by 16.8% 2011-2031, but Appendix B Figure B14 shows 19.3%. This data inconsistency must be resolved.</p>	<p>The final West Surrey SHMA now uses a mean of three employment projections so this is no longer applicable.</p>
<p>Throughout the draft SHMA, there are references to vacancy allowance. This is not required by the NPPF so should be removed.</p>	<p>As part of the assessment, it includes a vacancy allowance of 4% which the vacant/second homes figure for Guildford in the Census (2011). It is important that a vacancy allowance is included in order to take account of market churn.</p>

Student accommodation can be included (and in some cases should be included) in the figures for completions of homes. This would show that there has not been a persistent record of under delivery. Oxford City Council has shown that Local Authorities can control university student numbers "living out" so university future accommodation should impact upon housing need.	Student bedspaces can only be counted towards general market housing based on the level of market housing they release. We can therefore only count those bedspaces that are delivered which are over and above what our student bedspace need is calculated as. It is important to note that one bedspace does not equal one dwelling.
SHMA was not supported by Edge Analytics	Edge Analytics reviewed an earlier Guildford-only SHMA, rather than the West Surrey SHMA. This did not dispute the findings or methodology used by GL Hearn, only that different assumptions can be applied to the statistics which would naturally yield different figures. The West Surrey SHMA concludes that the national projections form a robust basis for considered OAN. This is consistent with the NPPG, which states that they should form the starting point.
The housing figure is too low/should be towards the upper end of the range suggested by the SHMA	
The SHMA is still draft/being reviewed/being challenged	A final West SHMA has now been published and informs the 'Proposed Submission Local Plan: strategy and sites'.
The Council is not planning positively to meet full OAN, as required by the NPPF / chosen lower end of range	The 'Proposed Submission Local Plan: strategy and sites' seeks to meet the full need identified for Guildford.
Evidence of deteriorating housing affordability relative to earnings suggests a case for an upward adjustment of the housing number	The 'Proposed Submission Local Plan: strategy and sites' seeks to meet the full need identified for Guildford. This includes an uplift to improve affordability.
There is evidence that London will not meet its housing need in full resulting in greater outflows from London. The new SHMA should have regard to any unmet needs arising from London.	The demographic projection already accounts for migration from London into Guildford. The final West Surrey SHMA also now includes a sensitivity analysis which seeks to understand the impact of increased migration from London. This responds to the population and household projections which underpin the Further Alterations to the London Plan (FALP). In this a central scenario was assumed which reverts migration levels after 2017 to a mid-point between pre- and post-recession levels. This results in an increase in out migration. Doing so results in an increase of 51 dwellings per year for Guildford above the demographic projection (568 homes per annum). This is lower than the OAN for Guildford which includes an uplift for economic and affordability factors (693 homes per annum). No further uplift is therefore necessary.
There has been a lack of consideration of the situation in neighbouring areas. The DLP limits this to working with neighbours "to see whether any unmet [Guildford] need can be met elsewhere", which is inadequate.	We are continuing to cooperate with Waverley and Woking to explore issues of unmet need. A commitment to ongoing joint working between Guildford, Waverley and Woking to address future unmet needs is demonstrated through the agreed Statement of Common Ground.

<p>There appears to be some discrepancy in historic supply in Guildford between the SHMA (May 2014) and the Housing Topic Paper (July 2014). The SHMA states that between 2001 and 2013 there has been an under supply of 161 units, whilst the Housing Topic Paper outlines that there is an under supply of between 1,342 units (based on previous targets and an objectively assessed need since 2011) and 2,207 units (includes objectively assessed need from 2009). The reason for this significant difference is that the target has been justified in the Housing Topic Paper to take account of 'objectively assessed need' whereas it has not in the SHMA.</p>	<p>The SHMA includes a chart showing net completions against planned supply. For the purposes of the SHMA this is taken to be the 322 figure from the draft South East Plan as the figure of 422 was removed from the final South East Plan. This is in line with the NPPG.</p> <p>As part of preparing the new Local Plan, and identifying sufficient supply of new homes, we will need to take account of the backlog of homes from the start of the plan period (2013).</p>
<p>The housing targets have not clearly taken account of the persistent under supply of housing since either 2001 or 2006.</p>	<p>The final West Surrey SHMA assesses housing need from the base date of 2013 (using the 2013 mid-year population estimate). The analysis takes account of any suppression in household formation rates caused by under-delivery of housing. There is no need to consider backlog from prior to the base date of the SHMA.</p>
<p>The 652 figure would cover the economic growth figure of 570 leaving only 80 or so homes available for other needs, including existing unmet need and the needs of the elderly (non-economically active)</p> <p>The draft SHMA includes a figure of 671 dpa which is more reliable because of the Mayor of London's assumptions about outward migration. The reduction to 652 has been done in order to offset the need from students. However, unmet need in Guildford, London and Woking is likely to more than offset this</p>	<p>The demographic baseline projection assesses the level of homes required to meet population change taking account of births, deaths and migration. This includes all ages in the population including the elderly. The economic projection further considers whether an uplift in homes is required to ensure that there are sufficient working age population to meet the job growth.</p> <p>The final West Surrey SHMA assesses the needs of students separately and includes an uplift in the OAN to meet the needs of students wishing to live in general market housing.</p>
<p>Affordability is a key issue. NPPF para. 17 states that there should be an upward adjustment to the housing baseline in order to address the affordability problems in Guildford identified in the SHMA. There should be an upward adjustment to the 780 figure as it is not clear that 780 would be sufficient (not justified by Experian data).</p> <p>The Cambridge Centre for Housing and Planning Research review of the draft SHMA concludes that there is evidence for recent house price and rent increases, and the deteriorating affordability of housing relative to earnings, to suggest that there is a case for adjusting upwards the demographic projection to address affordability and affordable housing need.</p> <p>Paragraph 8.24 of the SHMA (May 2014) advises that further research should be undertaken to test the ability to deliver up to 780 homes per annum within the borough to support improvements in affordability. Given that the draft local plan has been published without this work being undertaken we consider the document has not been based on adequate evidence. There is no evidence this test has been undertaken.</p>	<p>The final West Surrey SHMA includes an uplift for Guildford due to affordability, economic and student factors. The figure of 693 therefore represents the full objectively assessed needs of Guildford as required by the NPPF and NPPG.</p> <p>The final West Surrey SHMA includes an uplift for affordability reasons and the 'Proposed Submission Local Plan: strategy and sites' is seeking to meet the full OAN.</p> <p>The 'Proposed Submission Local Plan: strategy and sites' is seeking to meet the full OAN.</p>

<p>Rushmoor expect that they may not be able to meet their full OAN and depending upon discussions with Hart and Surrey Heath, there may be a possibility that Guildford is approached in the future.</p> <p>The draft SHMA has too high a reliance on the private rented sector meeting affordable housing need is given.</p>	<p>Whilst Guildford shares relatively strong linkages with Rushmoor, we sit within a core housing market area with Waverley and Woking. Rushmoor form part of a housing market area with Surrey Heath and Hart. We expect each authority to be able to demonstrate that opportunities have been maximised to meet their own needs and that of their respective housing market area first. In the first instance we will be working with Waverley and Woking to address any issues of unmet need in our housing market area as a priority.</p> <p>Given current mechanisms for funding affordable housing provision, it is unlikely that it would be feasible to deliver sufficient housing provision to meet the affordable needs in full. The reality is that many households with a need live in the Private Rented Sector and supplement their income with Local Housing Allowance.</p> <p>An uplift has however been applied to support enhanced affordable housing delivery and respond to market signals.</p>
<p>The selection of the HMA in the draft SHMA is not robust. The Local Housing Market Area (LHMA) established by the CLG, which included parts of Surrey Heath, East Hampshire and Rushmoor would be a more appropriate starting point for a HMA. There is also a case to be made that the HMA should extend into areas of Mole Valley to the east, where some of the more rural areas on the border are comparable with settlements in Mole Valley. Mole Valley also has similar Green Belt issues.</p>	<p>Whilst Guildford shares relatively strong linkages with other neighbouring councils including Rushmoor and East Hampshire, we sit within a core housing market area (HMA) with Waverley and Woking. A core HMA has been identified that includes Rushmoor, Surrey Heath and Hart. Under the Duty to Cooperate we will continue to actively engage these neighbouring councils. However, in the first instance, we should explore the extent to which our core HMA is able to meet the full OAN.</p> <p>We do not share very strong linkages with Mole Valley, who instead look more towards Elmbridge and Kingston. Green Belt constraints is not a relevant factor for defining HMAs.</p>
<p>652dpa is the figure produced on the basis that affordable households were willing to spend up to 35% of their income on housing costs and that the private rented sector continued to meet a proportion of housing needs based on current levels. No evidence is presented in the DLP, or its evidence base documents, which robustly illustrates that this conclusion is sound. Indeed, spending 35% of income on housing costs is a significant amount for those who are on the lowest incomes, indeed it is a sizeable percentage for those on moderate to high incomes.</p>	<p>The final West Surrey SHMA uses a 30% threshold within the main modelling for consistency with general practice nationally although it does include sensitivity testing to show alternative thresholds.</p>

<p>The 2014 SHLAA identifies that Guildford Borough could provide 5188 new homes in the next five years. However, as only 1394 of them have planning permission, there is a considerable level of ambiguity as to whether this aspiration could be achieved. Furthermore, of 5188 identified capacity, only 1624 are in Guildford Town Centre and the other urban / settlement areas of the Borough. The remaining 3564 are Countryside or Green Belt locations, and therefore have no guarantee of coming forward. The more certain figure of 1624 would equate to a 2.5 year supply, which is the very best position that the Council can put forward. the NPPF makes it clear that local authorities should provide an additional buffer of 5% on their 5-year housing supply requirements, which should increase to 20% for Boroughs which have a persistent under delivery of housing. The Council has accepted in its Housing Topic Paper that it has a record of persistent under-delivery so it should be looking to provide a 20% buffer over OAHN, which the 2014 SHLAA does not make any allowances for nor does the 652dpa figure.</p>	<p>The delivery potential of each site is described in the Land Availability Assessment. The buffer in the NPPF relates to moving housing from the later years of the plan, into the first five years to boost delivery of housing.</p> <p>The Housing Delivery Topic Paper and trajectory in the Land Availability Assessment explain how the proposed housing target is linked to the likely delivery of housing, and how the delivery of many strategic sites need to be considered in relation to the timing of key infrastructure outside of the council's control.</p>
<p>The treatment of student housing in supply and demand seems to be inconsistent and understated / This needs to be explicitly addressed and the University's strategy for the Plan Period needs to be taken into account / It is not clear how this information has been used to downwardly adjust the housing need in the SHMA.</p>	<p>The draft SHMA included the impact of students within the main demographic projection. The final West Surrey SHMA identifies a separate need for student bedspaces based on growth expected at the University of Surrey. It also includes an additional uplift for Guildford for general C3 housing to take account of the element of student growth in population that will continue to choose to live in general market housing rather than student halls.</p>
<p>By assessing the housing needs calculation based solely on the boundaries of Guildford Borough Council the Strategic Housing Market Assessment (SHMA) does not accord with national guidance which states that needs should be assessed across the whole HMA.</p>	<p>The previous Guildford-only SHMA has been superseded by the final West Surrey SHMA which covers the HMA.</p>
<p>The actual housing market goes wide into Aldershot and Hampshire [a considerable number of workers live in Aldershot cx Census], and the G London Plan that established the Metropolitan Green Belt actually specifies that overspill should jump the Green Belt, which means we should be asking for a much wider Strategic Housing Market Assessment than West Surrey, particularly in view of local land shortage.</p>	<p>As set out in the West Surrey SHMA, we consider that our core housing market area consists of Waverley and Woking. Rushmoor has identified that they site in a housing market area with Surrey Heath and Hart. However, we do acknowledge that we share linkages with Rushmoor, with whom we will need to cooperate with under Duty to Cooperate.</p>
<p>Green Belt and Countryside Study</p>	
<p>Green Belt purposes scoring changed between versions (B13/D6/F4) / no explanation</p>	<p>The Green Belt scoring changed as a result further work in Volume II Addendum. This was prepared following a review of the evidence base by the Joint scrutiny Committee amended the way in which two of the purposes were assessed in response to feedback received.</p>
<p>Settlement boundaries have been extended without explanation</p>	<p>Paragraph 86 of the NPPF states that unless a village makes an important contribution to the openness of the Green Belt it should not be included within the Green Belt. Volume 4 of the GBCS has assessed all our villages based on the requirements of the NPPF.</p>

<p>The GBCS should recognise that B13 does prevent neighbouring towns merging as if development is done as proposed, the gap between Send Marsh/Burntcommon and Burpham will be reduced to 750m.</p>	<p>Merging can be perceived or actual. As part of the proposed extension to Gosden Hill, the policy will require that the land immediately adjacent to the A3 is kept free of development in order to maintain a degree of separation between Guildford and Send Marsh/Burntcommon.</p>
<p>The GBCS does not adequately consider landscape character</p> <p>Environmental capacity not detailed enough/not easy to compare options</p>	<p>Greater cross reference to the LCA was included following the Joint Scrutiny review. The LCA does not seek to freeze the landscape but helps to guide development and manage change. We would need to consider this alongside other considerations as we progress the Local Plan, and, if allocated, the developer would need to use it to help inform their masterplan.</p> <p>The environmental capacity was used to identify whether there were any constraints that would prevent the identification of a potential development area.</p>
<p>The assessment of H1 and H2 do not take AONB policy into account.</p> <p>The GBCS didn't rank the 5 purposes. The South West Regional Assembly (SWRA) identified this as best practice.</p>	<p>We have taken account of the AONB and AGLV as part of developing our spatial strategy.</p> <p>The NPPF does not prioritise any of the purposes. Whilst the GBCS undertook a review of other studies and best practice, there is not only one single approach. No methodology is right or wrong as long as clearly justified.</p>
<p>The GBCS approach isn't able to make judgements on strength of purpose for Green Belt / Scoring too crude (1/0)</p>	<p>A scoring of 0 or 1 is considered robust and reasonable for assessing whether or not a land parcel meets a purpose.</p>
<p>The way in which the purposes were assessed is not justified</p> <p>Scoring /assessment is subjective</p>	<p>Volume II sets out how each purpose has been assessed. Volume II Addendum which was prepared following a review of the evidence base by the Joint scrutiny Committee amended the way in which two of the purposes were assessed in response to feedback received.</p> <p>As part of the review of the evidence base by the Joint scrutiny Committee, all feedback was considered where it related to issues of methodology or inaccuracy of data.</p>
<p>The GBCS interpretation of purpose 2 is flawed: an open, expansive landscape "contributes less in terms of anti-coalescence (scoring 0), whereas a land parcel which forms a narrow gap between two settlements would have a significant anti-coalescence role (scoring 2)". What really counts is whether building on this land would cause a bridge between these settlements causing them to merge. Land at H1 and H2 does fulfil this purpose as over the longer term the land along the slopes of the Hogs Back is under development pressure. Developing it would also link Park Barn, the Research Park, Wood Street with settlements in Pinks Hill, Down Place in Compton, with the small settlement of farm cottages on Blackwell Farm, with the houses of Beechcroft Drive and Onslow Village and the new communities of students and key workers at Manor Park.</p>	<p>The GBCS has already taken a looser interpretation of this purpose than set out in the NPPF and assessed whether land parcels prevent neighbouring settlements (rather than <i>towns</i>) from merging. This comment tries to go even further to include neighbourhoods within the urban area of Guildford (Park Barn, Manor Farm) and small groups of cottages (Down Place, Pinks Hill). It is considered unreasonable to try to argue that the purpose of the metropolitan Green Belt is to stop merging at this level. The study also took account of the fact that coalescence can be perceived or actual, and physical or visual. It therefore follows that the openness and the size of the parcel will inevitably have an impact upon the scoring.</p>

<p>Land parcels H1 and H2 fulfil purpose 3 (preventing encroachment) as they are open countryside. It is clear from other Green Belt studies that parcels that themselves are open countryside are 'stronger' in the way that they fulfil this purpose, while the GBCS contends that only developed land can fulfill this purpose. However, the presence of a small settlement at Down Place and a few farm buildings and farm cottages at Blackwell Farm does mean that this land should score a 1 according to the GBCS definition.</p> <p>The GBCS application of purpose 4 (historic towns) is overly simplistic. The SWRA report, for example, notes that the Cambridge Green Belt review has "withstood the rigour of Examination in Public, and comprised comprehensive and transparent assessment". The following factors were considered in Cambridge: Views towards the city, Topographical framework for Cambridge, Specific sites that enrich the setting, Physical links with Cambridge, Elements and features contributing to the character of the setting, Contribution to a strongly rural landscape setting, and Social or economic links with Cambridge. The Coventry study also acknowledged that the Meriden Gap formed part of the character of the area. The Hogs Back should be considered in the same way. St Albans considered the network or parcels. Applying equivalent factors to Guildford would result in H1 and H2 scoring strongly.</p> <p>The GBCS should consider purpose 5 (urban regeneration and reuse of brownfield land)</p> <p>The sustainability score is simplistic and does not take account of capacity of service, traffic issues, loss of farmland etc.</p>	<p>Following Joint Scrutiny committee the way in which this purpose was assessed has been amended as the comment recommends it should.</p> <p>Following Joint Scrutiny Committee the way in which this purpose was assessed was widened to include consideration of other factors than only Conservation areas. This includes potential impact upon the setting and special character of historic elements of Guildford, through cross reference to the Landscape Character Assessment (rural / urban fringe assessment 2007) and the likely impact upon Historic Parks and Gardens, and Scheduled Monuments.</p> <p>The GBCS takes the view that all Green Belt serves this function and therefore all land parcels would score equally. This approach is consistent with guidance published by the Planning Advisory Service (PAS) on Green Belt reviews and is the approach taken by all of our neighbours in their respective Green Belt reviews. Our spatial hierarchy prioritises the use of brownfield land before Green Belt sites.</p> <p>The study includes the key policy and environmental designations, e.g. flooding, SPA and so on. Further information was included following Joint Scrutiny including reference to Landscape Character Assessment and the Agricultural Land Classifications. Further detail is not considered appropriate as some aspects are picked up by other evidence base documents (e.g. the Sustainability Appraisal) and some are detailed considerations that would feed into a masterplanning exercise to support a planning application. It is important to note that Green Belt is not a landscape designation – it is a policy tool.</p>
<p>The GBCS doesn't address the issue of preserving the independence (separation) of individual villages.</p>	<p>Whilst the Green Belt purpose in the NPPF states that it is to prevent neighbouring <i>towns</i> from merging into one another the GBCS has assessed each parcel on the basis of whether it prevents settlements from merging.</p>

<p>Trees have been identified as structures that detract from openness / Presence of trees/defensible boundaries should not necessarily lead to inseting</p>	<p>If a highly developed village is physically enclosed to a significant degree by topography and/or vegetation there would be little opportunity to observe the land in question, and little opportunity to perceive how such land could significantly contribute to openness in Green Belt terms, thus limiting its opportunity to contribute to the openness of the area to any significant degree or attach any sense of importance. In these circumstances i.e. a combination of a strong sense of development with little sense of openness, coupled with a well contained village (physically and/or visually), the land will be unable to make an important contribution either literally or perceptually, and therefore can be argued as unnecessary in designation terms and could justifiably be excluded from the Green Belt in accordance with the NPPF guidance.</p>
<p>Non-permanent structures such as hedgerows are used as permanent boundaries</p>	<p>Recommended boundaries do include tree belts, woodlands and hedgerows. Whilst they consist of plants, such features are clearly recognisable, and with regards permanence will often be in place as long as, if not longer than, much built development. Such features are therefore considered to adhere to the boundary definition requirements, as set out in paragraph 85 of the NPPF.</p>
<p>Regarding Gomshall, the GBCS states that "On balance, the majority of the village is considered to exhibit an enclosed character." There are few areas of the village that can be seen as having an "enclosed character".</p> <p>The GBCS should not be done in conjunction with a housing study: it should aim to reinforce the Greenbelt, not seek opportunities to reduce it.</p>	<p>Whilst the GBCS recommends that Gomshall should be inset, the 'Proposed Submission Local Plan: strategy and sites' proposes to keep it washed over status due to its special character.</p> <p>The GBCS does not amend Green Belt boundaries but rather identifies a range of potential development areas that may be considered for Green Belt release should exceptional circumstances exist to warrant doing so.</p>
<p>The inclusion of "Tower Hill Rise" in Gomshall within the "inset" area is erroneous in that this was built as a rural exceptions site and is therefore "invisible" in planning terms and should be seen as undeveloped.</p>	<p>Green Belt policy does not apply in Rural Exception Sites. This is not to say that once built these would not impact on openness of the Green Belt and need to be considered as part of the built up area of the village.</p>
<p>Shalford is a large village and treating the whole settlement the same is incorrect: The village is defined as urban in nature but the examples are all drawn from North of the railway line. South of King's Road is green and open in character and King's road is an eminently defensible boundary.</p> <p>If the Green Belt designation is removed, land that is recognised to be important should receive another protective designation, particularly for those gaps not designated as common land.</p>	<p>Both parts of the village have been subject to the detailed assessment which considers density of built development, the extent to which open areas within the village appear continuous with areas of open land within the wider Green Belt and the presence of defensible boundaries.</p> <p>We recognise that there may be some land which is currently protected by Green Belt that is of public value and should therefore be given a level of protection in the new Local Plan. We have undertaken further work on this and have replaced the previous Local Plan 2003 R5 which protected important open space with a policy in the 'Proposed Submission Local Plan: strategy and sites'.</p>

<p>The GBCS lacks a strategic element / should cover larger area/ too piecemeal</p>	<p>There is not currently a mechanism for a strategic review of the Green Belt. However, we are working with our neighbours through the Local Strategic Statement to ensure that all individual Green Belt reviews are undertaken in a consistent manner. There may be opportunities in the future for greater joint working if local plan process can be aligned.</p>
<p>The study does not present clear definitions of terms as part of the interpretation of national policy, as this informs the specific questions. For example, it is vital to define terms such as 'sprawl', 'built-up areas', 'neighbouring towns', 'the countryside', 'encroachment' and 'historic towns'.</p> <p>All land that meets purposes should be protected</p>	<p>The study provides a clear description of how each Green Belt purpose has been assessed and interpreted.</p> <p>All countryside land is likely to meet at least some of the Green Belt purposes. We need to consider whether exceptional circumstances exist to justify amending Green Belt boundaries and the extent to which the benefits of providing homes outweighs the harm of doing so.</p>
<p>Some village land parcels meet all purposes yet have potential development areas identified</p>	<p>Our new spatial strategy seeks to avoid all high sensitivity Green Belt unless there are exceptional reasons for doing so.</p>
<p>Volume IV incorrectly judges areas of high density (Horsley, Effingham)</p>	<p>The methodology clearly sets out the type of development that is considered to constitute either low, medium or high density for the purposes of the assessment.</p>
<p>Higher density does not mean it does not contribute to openness</p>	<p>Where a settlement is highly developed and has little sense of openness within the built form, there would be no important contribution to be secured and therefore it would be unnecessary to include such land and it would be appropriate for it to be excluded and form 'inset' land within the Green Belt.</p>
<p>Does not involve local people/ organisations against development</p> <p>Open character of villages acknowledged in Local Plan 2003 – nothing has changed</p>	<p>The GBCS is part of our evidence base and was prepared by reputable consultants who did not have access to information related to what sites were being promoted for development. It was therefore prepared in an objective way with the most suitable sites being identified.</p> <p>National policy at the time of Local Plan 2003 preparation did not require insetting but enabled it if councils so wished. The NPPF requires that only those villages which make an important contribution to the openness of the Green Belt are kept washed over.</p>
<p>Need to take account of views from surrounding countryside</p> <p>Walking distances incorrect (West Horsley) 73 - school is private and centre has limited shops / 70 – hall is scout hut building/ 71 hall is a church hall/ 70+71 amenity is middle of housing estate</p>	<p>The Green Belt is not a landscape designation.</p> <p>The schools identified on the SA map are academies. The amenity situated near housing is the nearest available service for these sites.</p>
<p>Uses non-pedestrian routes / Send/ Shalford to Wonersh/Bramley</p>	<p>Pedestrian routes have been identified in Send; Shalford to Wonersh and Bramley.</p>

Perceived village area/possible boundary features extends into Mole Valley District Council	We can only amend Green Belt boundaries within Guildford borough. We will continue to work with Mole Valley under the Duty to Cooperate should they seek to review their Green Belt boundaries.
Identifying a percentage built ratio is subjective and not consistent	The assessment of the percentage of built development was removed from the study following a review of the evidence base by the Joint scrutiny Committee in response to feedback received.
GBCS did not demonstrate exceptional circumstances to justify inset boundary	Insetting is required by paragraph 86 of the NPPF. It is not the role of the GBCS to identify exceptional circumstances – that is the role of the Local Plan in determining whether Green Belt boundaries should be amended.
Volume IV incorrectly claims that views are intermittent at Effingham	We have not extended the inset boundary as wide as the GBCS recommends for Effingham as we consider that the King George V fields do contribute to the openness of the Green Belt.
Should include legal ownership boundaries as this is considered defensible	The NPPF requires that boundaries are easily recognisable. For this reason we must use features that are present on site not ownership.
C1 - Burpham Court Farm closed, incorrect paths and ignoring an onsite facility and choosing a more distant one	Burpham Court Farm is open and suitable for recreational use. The most appropriate amenities have been identified for this site; including facilities at a greater distance from the site.
H1 and H2 should have been included as one land parcel – if so would have scored more and been excluded from assessment / land parcels do not follow defensible boundaries (H2)	As stated in Volume II: <i>The boundaries of each land parcel are clearly demarcated by visible landscape features such as woodlands, hedgerows, roads or railway infrastructure. This is to ensure that if a land parcel is deemed suitable for development, it would be physically and visually contained, and the Green Belt boundary would represent a clear defensible boundary, as required by PPG2 and the NPPF.</i>
Land parcels used as units for assessment identified in an arbitrary and inconsistent way- significant implications for the outcome of site assessment	In much the same way, Gosden Hill consists of two land parcels. Both sites consist of land parcels separated by a tree belts/woodland and therefore follow the methodology set out in the study – namely that they are visually contained and represent a clear defensible boundary.
Appendix C refers to only volumes 1-4 of the GBCS while the Plan refers to volumes 5 and 6	Volume II details the way in which land parcels were delineated. They have been identified on the basis that they are visually contained and follow defensible features.
Appendix C refers to only volumes 1-4 of the GBCS while the Plan refers to volumes 5 and 6	Comment noted. This will be updated.
Infrastructure and Infrastructure Baseline	

<ul style="list-style-type: none"> • Reference to new infrastructure only being considered when there is a strong case or gaps. Both in fact apply now. There is currently an infrastructure deficit. • The plan does not include infrastructure constraints such as the provision of secondary schools • The infrastructure evidence base is generally poor and does not demonstrate that the proposed developments can be supported • The IB should include items in the Infrastructure Schedule (appendix B) that are known to be in progress or committed and removing foreseen items that have been implemented. • 2.1.18 says that HA has no plans for the A3. This is unacceptable. • 2.1.19 says the Onslow P&R will improve things: this is not happening. • 2.1.20 says that another P&R is possible: not true. • 2.2.26 says that three schemes will happen in 2014-15: apparently not. • The IB should include more detail on existing deficiencies as the draft plan does not include measures to address existing deficits, which it should. • The IDP is listed in the 'key studies' section but does not exist yet. It needs to be in place before development is brought forward. • SCC have stated that £800m of investment is needed just to bring existing infrastructure up to date. This should be done before further development happens. • The plan should highlight the expected impacts on different types of infrastructure for different developments • The unfair balance of the quality of schools across the borough should be addressed • The Local Enterprise Partnership (LEP) has identified in its Economic Plan 2014-2020 three schemes it will not be funding but which are key to the success of the Local Plan: a. A3-M25 interchange, b. Guildford A3 strategic improvements, c. North Downs Major Investment Programme. The LEP has also identified a strategic package for the A3 in North-East Guildford and new railway halts at Merrow and Park Barn but without assuring the necessary funding. The lack of funding commitment from both the HA and LEP means that infrastructure is a considerable constraint on development unless resolved. This should be acknowledged by the Draft Plan but is not. • Location of flood storage east of Merrow Lane has not been identified on any map. • Fails to identify foul sewer flooding in Burpham (New Inn Lane and Bowers Lane) and no steps identified to rectify the problem. 	<p>We cannot require developments to contribute to resolving existing infrastructure shortfalls due to the legal tests that a planning obligation are subject to, i.e. that the planning obligation is:</p> <ul style="list-style-type: none"> • necessary to make the development acceptable in planning terms, • directly related to the development, and • fairly and reasonably related in scale and kind to the development. <p>Once we have introduced the Community Infrastructure Levy, we can use the CIL to fund improvements to infrastructure that would be worsened by new development, as well as providing new infrastructure.</p> <p>CIL payments will be agreed when development is approved, but CIL payments cannot be in the bank before development starts, as national rules set out when payments must be made (unless we chose to adopt an Instalments Policy to allow staged payments to help cash flow for the development).</p> <p>The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure to needed support this planned housing.</p> <p>The IDP will be updated as further detail is available. Developer contributions (including the "pooled" Community Infrastructure Levy), planning contributions and other funding sources will be used to ensure that key supporting infrastructure is delivered to be available when it is needed.</p>
<p>Transport evidence base</p>	

Options Growth Scenarios Transport Assessment Report (OGSTAR) (Surrey County Council, January 2014) was completed before the 2014 Draft Local Plan (Draft Guildford borough Local Plan: strategy and sites (July 2014)) was finalised, and so the scenarios tested do not correspond to that formed by the current development proposals. The evidence base would be enhanced by a new test using the 2014 Draft Local Plan scenario to forecast 2031 traffic. As the option in the plan has not been tested, it is not possible to examine the traffic impacts.

A Transport Assessment based upon a strategic SINTRAM model was completed by Surrey County Council and issued in January 2014, 6 months before the draft Local Plan was published, however there is no reference or notice taken of this important document in any of the draft Local Plan strategies and policies despite it assessing the impact of each development on the local highway network which serves them and is indeed part of the Local Plan's evidence base. A technical highway appraisal is not even mentioned as Key Evidence at the end of Policy 11.

OGSTAR is a useful part of the evidence base but the major routes are not addressed and so the context for the local proposals is missing. For example, item 5.1.2 in describes a new junction on the A31 or A3, but knowledge of the conditions on those routes and practicality of such a connection is missing.

Previous Local Plan-focused strategic transport assessments, as published on the Council's website, have considered a range of growth scenarios representing different quantum and distributions of potential future development in the borough. The most recently published previous assessment, the Options Growth Scenarios Transport Assessment Report (Surrey County Council, January 2014) (OGSTAR), assessed a range of such growth scenarios, but due to the lead-in times and the resources required to prepare a new assessment, none of these scenarios matched the proposed spatial strategy as set out in the 2014 Draft Local Plan. In the absence of a growth scenario matching the spatial strategy in the 2014 Draft Local Plan, we opted to use Scenario 7 from OGSTAR to inform consequential analyses and to inform discussions with stakeholders and partners.

The quantum of planned growth in the borough as set out the spatial strategy for the 'Proposed Submission Local Plan: strategy and sites' is significantly less than that represented in Scenario 7 from OGSTAR. OGSTAR's Scenario 7 can thus be regarded as a 'worst case' in terms of transport 'demand'.

The previous Local Plan-focused strategic transport assessments, including OGSTAR, also represented a 'worst case' assessment in terms of transport 'supply', in that they assessed potential future transport impacts of growth scenarios in the absence of any future transport schemes, other than those fully funded at that time.

In contrast, the new strategic transport assessment, which will be evidence base accompanying the 'Proposed Submission Local Plan: strategy and sites', will assess the impact of planned growth in the plan period and then the impact of highway schemes that are considered necessary for the delivery of the draft Local Plan in mitigating the impact of the planned growth.

The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'.

This new strategic transport assessment will build on a series of model tests that have been undertaken by Surrey County Council on the Council's behalf over the past year which have assessed the potential mitigation provided by various scheme options. This series of model tests used OGSTAR's Scenario 7 as a reference case.

Since 2014, the Council has undertaken and commissioned further study work and produced and is producing new transport evidence base including a new Local Plan strategic transport assessment, the Guildford Borough Transport Strategy (April 2016) and a Transport Topic Paper.

Studies were based on zero population growth while the plan is proposing large levels of growth – not fit for purpose

All previous Local Plan-focused strategic transport assessment studies have considered a range of growth scenarios representing different quantum and distributions of potential future development in the borough.

In a separate study, the Guildford Town and Approaches Movement Study, the model testing was focused on assessing the impact of various principally highway-based schemes on a range of criteria. This study was initiated prior to the Council identifying a spatial strategy for the 2014 Draft Local Plan. It was decided to use a scenario as the reference case which did not include potential options for different quantum and distributions of potential future development in the borough, in order that the focus could be on the model testing of the various schemes, to identify a preferred package of schemes. The forecast 2031 reference scenario used in the GTAMS study is described in paragraph 5.3.2.2 of the GTAMS Vision, Objectives, Baseline and Business-As-Usual Report, available on the Council's website. The scenario did include, for Guildford borough, background growth to 2031 in trips resulting from changes in demographic profile and car ownership in the borough using Department for Transport forecasts, and, for the rest of the country, trips representing full development in the rest of the United Kingdom to 2031, including background growth, using Department for Transport forecasts.

Draft

GTAMS identifies a need for a shift in travel behaviour toward sustainable transport but the means of achieving this shift in behaviour are described only in very general terms. There is a marked absence of any highway proposals. The study is flawed in that it used a 2031 traffic forecast that included only existing land use and approved planned developments within the borough. This bears no relation to the 2014 Draft Local Plan growth plans. The major scheme that is proposed in the strategy is a 'Sustainable Movement Corridor', at an estimated costs of £75-100m, but there is no analysis of this scheme at all. The GBC Topic Paper on Infrastructure says in para 5.12 that the route has been safeguarded from the town centre to the university. Schemes to improve the operation of the A3 were treated as undeliverable in the Appraisal Report, a position which is inconsistent with the EM3 and HA strategy.

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This new strategic transport assessment will build on a series of model tests that

<p>Road data must be up to the minute as it worsens by the month. The last two years have seen noticeable worsening in traffic in the Horsleys due to families moving out of London.</p> <p>It uses incorrect baseline figures.</p>	<p>Comments noted.</p> <p>Reference year scenarios in the SINTRAM strategic highway model, as published as Local Plan strategic transport assessments, have been calculated using forecast data from the Department for Transport.</p>
<p>The only evidence on transport infrastructure appears in the Infrastructure Baseline which is only an audit of existing infrastructure. At least the 2014 Draft Local Plan should draw on GTAMS and the conclusions it drew about getting through traffic onto the A3.</p>	<p>Comment noted.</p> <p>Since 2014, the Council has undertaken and commissioned further study work and produced and is producing new transport evidence base including a new Local Plan strategic transport assessment, the Guildford Borough Transport Strategy (April 2016) and a Transport Topic Paper.</p>
<p>Evidence on transport is severely lacking.</p>	<p>The 2014 Draft Local Plan proposed two new rail stations and new Park and Ride facilities.</p> <p>Two new rail station and a new Park and Ride facility at the Gosden Hill Farm site are proposed in the 'Proposed Submission Local Plan: strategy and sites'.</p>
<p>The Surrey Local Transport Strategy for Guildford is not yet available. This is a key piece of evidence.</p>	<p>The Guildford Borough Transport Strategy (Guildford Borough Council, April 2016) will inform the preparation and review of Surrey County Council's Local Transport Plan, including the proposed Local Transport Strategy and Forward Programme for the Guildford borough area, as and when this is prepared, revised and adopted.</p> <p>Since 2014, Guildford Borough Council has undertaken and commissioned further study work and produced and is producing new transport evidence base including a new Local Plan strategic transport assessment, the Guildford Borough Transport Strategy (April 2016) and a Transport Topic Paper.</p>
<p>There is a lack of analytical evidence in support of the two proposed railway halts, and it is not clear whether there has been any engagement with Network Rail or train operators about the practicality of the schemes.</p>	<p>Further study work has been undertaken and commissioned in respect of the proposed Guildford West (Park Barn) and proposed Guildford East (Merrow) railway stations. There has been engagement with both Network Rail and train operators regarding both proposed stations.</p>
<p>The report by the HA 'M25 to Solent route-based strategy evidence report' (April 2014) has not been included in the evidence base. This identifies A3 traffic as a key challenge.</p>	<p>This study and the Government's subsequent Road Investment Strategy (December 2014/March 2015) have been taken into account in the 'Proposed Submission Local Plan: strategy and sites'.</p>

<p>The Enterprise M3 Strategic Economic Plan 2014-2020 (March 2014) includes a Growth Package for Guildford. This is also evidence that should be in the evidence base. It lists three strategic schemes 'which will not be funded through the Local Growth Fund, but are vital to the overall success of the package'. These are A3/M25 Wisley Interchange, Guildford A3 Strategic Improvements, and a North Downs Line major improvement programme. It also lists an A3 Strategic Package-NE Guildford and new railway halts at Merrow and Park Barn. The absence of any indication of funding or timing of any A3 schemes is a major shortcoming in assessing the proposed major housing developments in A3 corridor in the 2014 Draft Local Plan. The NPPG advises that Local Plans should set out what infrastructure is needed and who should deliver it.</p>	<p>The Government first published its Road Investment Strategy in December 2014. This has been taken into account in the 'Proposed Submission Local Plan: strategy and sites' which includes at Appendix C Infrastructure schemes SRN2, SRN3 and SRN5 from this strategy.</p> <p>New rail stations at Guildford West (Park Barn) and Guildford East (Merrow) are schemes NR2 and NR3 respectively.</p>
<p>OGSTAR. The planning data for the Aldershot Urban Extension (AUE) site was produced using Surrey County Council's Strategic Transport Model, SINTRAM. Hampshire County Council understands that the SINTRAM does not include a northbound on-slip to the A33, as a major transport intervention proposed to support development at the AUE. Hampshire County Council requests that the implications of the northbound on-slip road should be modelled in the Options Growth Scenarios Transport Assessment work.</p>	<p>This has been included in the new strategic transport assessment, which will be evidence base accompanying the 'Proposed Submission Local Plan: strategy and sites'.</p>
<p>There has not been a recent origin and destination study prepared before the plan was drawn up, and therefore no proposed solutions to the traffic problem.</p>	<p>This refers to an origin-destination survey of traffic using the gyratory in Guildford town centre. A new origin-destination survey has been undertaken and the results have informed further study work.</p>
<p>Additional information from the strategic transport assessment requested by other local authorities</p>	<p>Requests will be addressed in respect of the new strategic transport assessment, which will be evidence base accompanying the 'Proposed Submission Local Plan: strategy and sites'.</p>
<p>No document mentions that the peak hours London bound train service is already above capacity with no sign of any improvement to come</p>	<p>Since 2014, Guildford Borough Council has undertaken and commissioned further study work and produced and is producing new transport evidence base including a new Local Plan strategic transport assessment, the Guildford Borough Transport Strategy (April 2016) and a Transport Topic Paper.</p> <p>Network Rail's Wessex Route Study (August 2015) proposes a strategy, including 'choices for funders' for the Department for Transport to consider, which will address the challenge of accommodating projections for growth to 2043. This is referenced in the Guildford Borough Transport Strategy (April 2016).</p>

Spatial strategy:

- Urban, brownfield and regeneration options have not been adequately researched/presented
- Research on infrastructure has not been completed, no indication of the infrastructure required to support the level of development.
- There is no strategic vision for the town
- The plan focuses too much development that would affect Burpham: Clay Lane link road, Gosden Hill Farm, Wisley, Merrow Depot, Send and Burntcommon etc.
- There is no evidence to favour the use of Wisley airfield over more sustainable extensions to existing settlements. This choice has not been explained.
- The plan should re-appraise the suitability of employment sites to see if any of it can be reused for housing
- The plan should consider merging settlements that are near train stations as alternative spatial options
- The plan shows a cluster of sites in the town centre and a ring of sites on the urban edge, but nothing in the land in between. The plan should explore these urban opportunities more or make comment on why it is like this
- The densities proposed for some of the town centre sites are too high e.g. 300 dph for Debenhams
- Development is concentrated in the west where traffic problems are at their worst. The settlements in the east of the Borough have no road links identified as being over capacity by SCC.
- The Draft Plan is proposing substantial uplifts on the ELA's requirements. These equate to a 51% increase on the lower baseline range figure and a 31.5% on the upper baseline range figure. Furthermore, the ELA's conclusions on the 7 sites analysed and included as suitable potential development areas, were already considered to provide over and above the required levels of new floorspace, when considered in conjunction with the existing sources of supply.

We have sought to maximise brownfield opportunities however this is insufficient to meet our objectively assessed development needs.

The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure to support the planned development which is expected to place extra pressure on existing infrastructure, or to need new or improved infrastructure. The IDP will be updated as further detail on supporting infrastructure is available. Developer contributions and other funding sources will be used to ensure that key infrastructure is delivered when it is needed, including at the planning application stage.

Policy E7 in the Proposed Submission Local Plan: strategy and sites includes a vision for the town centre.

All reasonable alternative spatial and site options have been assessed as part of the Sustainability Appraisal process.

The 'Proposed Submission Local Plan: strategy and sites' contains strategic policies, Policy D1: Making better places recognises that new development must respect its context, and states that all developments will "respond meaningfully and sensitively to the site, its characteristics and constraints, and the layout, grain, massing and height of surrounding buildings." This policy will be used to ensure that new development is of a height and density relevant to its context. The supporting text has been amended to reinforce this and now includes a sentence which says,

Density is considered on a site by site basis, based on planning history, constraints and the character of the area. More information is available in the Land Availability Assessment and topic papers, explaining the approach to the delivery of housing.

The Land Availability Assessment identifies realistic candidates for development, and discounted sites. To be a realistic candidate for development, sites are assessed against criteria set out in the NPPG, which includes consideration of the availability and deliverability of land. Many town centre car parks are constrained by high flood risk. The LAA has assessed all land that has been formally suggested, in response to calls for sites. Land is assessed against the criteria set out in the NPPF and NPPG, and categorised in the LAA as a realistic candidate for development, or discounted. For discounted sites, a reason is given. However, this does not prevent a development proposal on a discounted site seeking planning permission, and being considered against relevant planning policies. If the landowner wishes to seek planning permission and constraints can be overcome, a planning permission could be granted. Such sites would still contribute towards supply.

Sustainability appraisal and HRA:

- Were not published until after consultation started
- The SA does not give enough detail regarding environmental, biodiversity and landscape considerations
- The SA has taken points in isolation instead of considering the impact as a whole.
- At the start of the DLP consultation, the questionnaire asked whether people agreed with a non-existent SA.
- The Sustainability Appraisal uses data from the 2007 SHLAA that fails to address changes in the purpose identified for the land or an expansion of the land identified for the purpose in the current draft.
- The SA came after the DLP was written so either the draft Local Plan is inconsistent with the SA or the SA has been written to fit in with the draft Local Plan aspirations rather than to influence them
- The sustainability indicators ignore: Irreplaceable assets, distinctive character and the countryside
- The SA does not take into account Traffic congestion, Climate, Health, Cost, Impact on Green Belt or School provision
- The HRA notes that the SANG locations and their deliverability remain uncertain. Plainly, further appropriate assessment work is required to determine whether the draft Plan "would" adversely affect the integrity of the SPA.
- The screening for draft Site Allocation 116 is factually incorrect in that it refers to an available SANG capacity of 55.5ha of land rather than 39 ha. The HRA cannot therefore be relied upon to show that the mitigation proposed is acceptable. no mention is made of the fact that draft Site Allocation 116 lies wholly within 70m to 400m of the SPA, is crossed by a number of public footpaths connecting the land to the SPA, and has no physical barriers to prevent access to the SPA. The suitability for the stated purposes has not been properly screened, nor has the site's capacity to support any level of housing development.
- In relation to Draft policy 9, we agree with the suggestion to include a statement precluding development that would have detrimental effects on the environment, including the Thames Basin Heaths.
- As a matter of law any decision in plan making must be based on a full and robust understanding of the impacts, and the precautionary principle should be applied where there is uncertainty as to the likely effects of the proposed policy the European designated SPA. We conclude that the screening of the draft policies (2 and 9) and draft allocation sites at this stage of the plan making process is inadequate.

These comments have been responded to in the section on SA /SEA and HRA.

SHLAA:

- Sites sometimes includes the need for SANG, sometimes do not
- The SHLAA has three 5 year periods but the Plan is a 20 year plan
- Guidance recommends a joint SHLAA, it is unacceptable not to consult with MVDC and Bookham Vanguard, especially as sites in Bookham could be removed from the Green Belt and developments at Effingham could affect the BV neighbourhood plan and HTSP for Mole Valley
- Sites less than 5 units should be removed from the SHLAA as they are unpredictable and would allow a more accurate forecast of land to be made.
- The SA suggests that housing need trumps all other sustainability concerns
- Regulation 18 (3) of the Town and County Planning (Local Planning (England) Regulations 2012 requires GBC to consider all representations to the Local Plan. This states that "in preparing the Local Plan, the planning authority must take into account any representations made to them". Having reviewed all documentation in detail, our submissions (Leewood Park, Effingham) to the SHLAA 'Call for Sites' are and remain 'invisible'. The GBCS was used as grounds for refusal for further consideration in the SHLAA. This gives the GBCS great significance and means GBC should have consulted on it. The approach blurs the distinction between the Green Belt assessment process and decision-making. The analysis in the GBCS conflicts with analysis provided by the site promoters.
- The SHLAA doesn't include or maximise brownfield sites resulting in a disproportionate split between greenfield and brownfield/The SHLAA should indicate that brownfield land is a first choice. The Council should do more to bring forward Slyfield and wider scale redevelopment.
- The methodology used where analysis has taken place is not explained.
- The SHLAA contains sites that were not included at the Issues and Options stage
- There is no allowance for windfall development in the SHLAA. A reasonable allowance of about 50 units per annum should be included particularly in view of the recent relaxation in converting commercial accommodation into housing units.
- All un-built student and staff accommodation for which the University of Surrey has full planning permission should be included in the SHLAA.
- All undeveloped land at Manor Park, or any other land owned by the University, should be included in the SHLAA.
- The SHLAA includes sites that are on floodplains
- The SHLAA does not adequately consider access
- The SHLAA does not adequately consider viability
- All SHLAA sites are not replicated in the DLP. This is reasonable, but the DLP should state the reason and explain what the cutoff is (e.g. 18 homes)
- The data in the site proformas in the DLP do not include total number of homes for each site, which makes this information difficult to find.
- The numbers in the SHLAA do not tally with the numbers in the DLP. The presentation of the numbers is confusing and reduces transparency. (very detailed, see DLPSS14/8308)

The SHLAA has been updated, and a Land Availability Assessment (LAA) published alongside the Proposed Submission Local Plan. The LAA forms part of the evidence base and is prepared in accordance with the guidance set out in the NPPG.

The LAA uses a site size threshold in accordance with the NPPG, and also lists all sites considered, and states the reasons they have been discounted, or provides more detailed information where they are considered a realistic candidate for development. A windfall allowance has been added to the LAA.

The LAA is a technical study, and therefore not a consultation document. However, if there is information about additional previously developed land in Guildford borough that would help to update the LAA, suggestions can be submitted to the planning policy team. To be included as a realistic candidate for development, sites must meet the criteria of either deliverable or developable, as set out in NPPG.

Employment Land Assessment:

- The ELA 2013 methodology is flawed
 - Forecasts increase in retail of 11% (2006-2013) but CERR forecasts 11% retail growth by 2018/ the CERR predicts that 11% of retail outlets will close by 2018
- It didn't include the space used by offices
- Predicts growth in employment in warehousing despite very high land prices and congested roads
- High land prices and congestion will constrain growth
- It uses out of date data (some from 2006)
- It presumed growth in retail where other reports have not due to increases in internet shopping.
- The Enterprise M3 Strategic Economic Plan 2014-2020 (March 2014) includes a Growth Package for Guildford. This is also evidence that should be in the evidence base
- Current ELA is inadequate it did not identify that as short term need for new land can be met by redevelopment of existing sites
- The economic boom seen in the last 10 years is misleading as it was driven by conditions that are unlikely to be repeated
- The ELA focuses on provision for retail and associated uses. There should be a switch towards high-tech, medical and knowledge based economies as retail will be reduced by internet shopping. Warehousing/distributing is space hungry and not a good use of land in a congested town.
- The ELA places too much emphasis on building homes for workers. It should focus on putting workplaces in sustainable transport accessible locations.
- The plan refers to an unpublished ELA so it is not clear whether policies are evidence based.
- There are vacancies on many industrial and commercial estates in Guildford, including Surrey Research Park, Walnut Tree Close and Cathedral Hill Industrial Estate, Guildford Industrial Estate, G1/G2/G3, Woodbridge Meadows, Middleton Industrial Estate, and probably in many others. I have produced an appraisal of this study justifying the need for commercial and industrial land pointing out its flaws and it is attached.
- The proposal to expand retail centres across the borough by 69,000 square meters flies in the face of what the retail trade are saying (and doing). New retail centres will dilute the strength of the retail sector in Guildford's High Street and lead to shop closures. The move to internet shopping should be embraced and the ease of click and collect should be explored so that collections can be made without having to drive into or across central Guildford, by having click and collect points in Park and Ride car parks.

The 2013 ELA has been superseded by one produced by consultants AECOM which was published in September 2015.

Both the 2013 ELA and 2015 Employment Land Needs Assessment (ELNA) looked at B class jobs and do not include in jobs in other sectors including retail.

The ELA does not mention building homes.

The demand forecasts in the ELNA take into account existing vacancy rates and the need to retain an appropriate level (5%) of vacant and derelict sites while sites are prepared for new occupiers. This is termed "frictional vacancy" and is necessary for the market to function well.

The Retail and Leisure Update Study 2014 identifies needs over the plan period. The only new centres proposed are local centres to serve the everyday needs of the proposed strategic housing sites. These would serve a different function and would therefore not compete.

Settlement hierarchy/profiles:

- The figures have been manipulated to get the desired outcome
- It uses private schools in the provision of education
- It includes school walking routes along single track roads and roads with no footpaths
- East Horsley has been inappropriately identified as a District Centre
- The settlements of Send and Send Marsh/Burntcommon receive the same number of points as Guildford Town Centre. Therefore the decision to focus development towards these settlements is based on incorrect evidence.
- Send Marsh/Burnt Common have no shops apart from the Shell garage convenience store and has no other facilities (school/doctors surgery etc) at all.
- The map giving rise to the population area for Compton included parts of Binscombe. This needs amending as will any linked services.
- The Settlement Hierarchy was filled in differently by different Parishes as it wasn't clear which area should be included.
- Ranking villages according to misnamed "sustainability" and functional scores with weightings does not provide a basis for directing growth. The objective should be to identify future capacity for sustainable growth, while respecting limits and not turning villages into towns.
- Normandy has been marked with a pub, which is closed, a school it never had and Ash has not had a bank for many years.
- Send has been attributed 25-20 buses a day when in fact there are only 13. The schools are not available, over subscribed or cannot be reached by public transport. Send is not a strategic employment area.
- The Report is inadequate as it fails to consider the particular characteristics of the neighbourhoods of the Guildford Urban Area.
- Normandy, Flexford and Christmaspie are individual hamlets, not a single village. This same approach has not been applied to other villages, which are regarded as separate. Vol 5 of the Countryside study has changed in assessment of the area. You are now treating Normandy and Flexford as separate areas but you go on to apply the rules you have made for yourselves as to whether they should be insetted in a wholly inconsistent manner
- Normandy and Flexford both meet the test of openness as per the NPPF.
- Normandy and Flexford function as a buffer between the sprawl of Ash/Tongham and Guildford.
- Normandy has received a high score based on a doctor's surgery, a school and a station. It does not warrant the high score
- In the documentation produced the existing settlement boundaries appear to have been moved and are shown to be linking with the land plots identified in the SHLAA.
- Local services in Normandy are poor (e.g. lack of a shop). It is unlikely that even if all the SHLAA sites are delivered investors would still not support provision of these services.
- Local centres description displays a distinct lack of local knowledge in that

The Settlement Hierarchy was reviewed following feedback as part of the Joint Scrutiny Committee process. We consider that the Settlement Hierarchy is a robust yet proportionate piece of evidence base. Given the range of considerations that have informed the spatial strategy we do not consider it necessary to revise the Settlement Hierarchy. Its primary purpose is to better understand the range of services and facilities that are present in each village.

5. Comments on Appendix D Superseded Policies

Comment	Guildford Borough Council Response
The policies may cover similar issues but wording of policies is more vague than the 2003 policies	The draft policies presented in this document are strategic policies which are generally more “high level” than the Development Management policies that will follow.
Plan must refer to the purpose of this list	It is a legal requirement to say which LP policies would be superseded by the proposed policies. We will make this clearer.
Draft plan pays too little attention to land for sport and recreation	Additional detail has been included in a Green Infrastructure policy, but the development management details will be presented in part 2 of the Local Plan
Although not a strategic issue, need a development control policy to discourage fast food outlets and take-aways in the vicinity of schools	We will consider whether we can this is in our expanded policies..
<p>Policy 16 is far more flexible than policies S8 and S9, District and Local Shopping Centres.</p> <p>Policies S4 to S7 are irrelevant to Policy 16 because they cover primary, secondary and tertiary and specialist shopping areas in the town centre. They are not covered by Policy 15.</p> <p>They need to be covered somewhere.</p>	<p>Policy 16 was a strategic policy only, and was only intended to replace the strategic element for district and local centres.</p> <p>The new Local Plan retail policies are holistic, and include all details of protected shopping frontages.</p>
<p>Appendix D lists superseded Policies.</p> <p>There seems to be no reference to it in the main text of the Plan.</p> <p>Q7. 4.1. All appendices should be properly referenced within the main text. It is not referred to in para 1.1 which mentions the 'delivering development' second part of the Plan (the initial letters should presumably be capitalised to ensure that the user understands this to be a specific reference -viz. "Delivering Development"), and 'delivering development' is not in the Glossary of Appendix A although 'Local Plan Strategy and Sites' is.</p>	It is a statutory requirement to include such as list. We will explain its relevance in the next draft of the LP.
<p>Good policies from the 2003 plan should be saved in the new plan.</p> <p>'Annex 1' of the Core Strategy Consultation was 'Saved Policies'. It listed all the saved local policies to be replaced by the Core Strategy. We have checked this against the Appendix D list. The Appendix D list is satisfactory in this respect.</p> <p>2003 Policies R2, R3 and R4 were in the Consultation list for the Core Strategy, but it would be reasonable for them to be saved in 'delivering development'.</p> <p>The Consultation for the Core Strategy then listed all the Policies 'to be reviewed later by the GDF'. These are the ones for 'delivering development'.</p>	The vast majority of 2003 LP Policies were saved indefinitely in 2007.

Comment	Guildford Borough Council Response
<p>A third list gave 'Policies that were not saved for future use' (H1, H10, S1, RE7, HE11, GT4, U1).</p> <p>The three lists gave complete coverage of all the 2003 Policies.</p> <p>The Guildford Society recommends that Appendix D should include the two latter lists.</p>	

6. Comments on Appendix E: Overview borough map

Issue	Guildford Borough Council Response
<p>Include the River Wey corridor on all maps</p>	<p>Comment noted. Amendments have included on the new Policies Map.</p>
<p>Appendix E is unclear, and the implications of inseting, for example, are not made clear. Areas that were previously washed over by Green Belt and are proposed for inseting are just shown as changes to the settlement boundary; the real impact of the proposed changes, which is substantial, is not really made clear.</p>	<p>Comment noted.</p>

7. Comments on Appendix F: Policy and Monitoring

Issues	Guildford Borough Council Response
<p>Monitoring the historic environment solely using the Historic Environment Record is insufficient. Should look at all aspects of the condition</p>	<p>The monitoring section for all policies included within the Proposed Submission Local Plan has been updated and expanded upon.</p>
<p>Success isn't just about the provision of development- stitch up between Central gov, local gov and developers</p>	<p>The monitoring section for all policies included within the Proposed Submission Local Plan has been updated and expanded upon.</p>

8. Comments on Appendix G: Maps

Issue	Guildford Borough Council Response
<p>Comments on Appendix G</p>	<p>Comments on Appendix G have been responded to under Policy 10: Green belt and the countryside.</p>

9. Comments on the Consultation Questionnaire: Question 1 The evidence base

Issue	Guildford Borough Council Response
Comments on the evidence base	Comments on the evidence base are addressed in the table for Appendix C above.

10. Comments on the Consultation Questionnaire: Question 2 National Policy and guidance

Issue	Guildford Borough Council Response
Compliant/Sound	A planning inspector will determine whether the Local Plan is sound at an Examination in Public (EIP). The date for the EIP has not yet been set and will not be known until after the Local Plan is submitted to the Planning Inspectorate.
<p>Non-compliance:</p> <ul style="list-style-type: none"> • Non-compliant/unsound • Does not meet NPPF tests of Soundness – not positively prepared, justified or effective. • Failed DTC • Plan should be found unsound in due course on the basis that there is an absence of critical information • Dismayed at the way the Local Plan has been explored and proposed. I believe it to be fundamentally flawed and simply not viable in its current state. 	<p>A planning inspector will determine whether the Plan is sound at an Examination in Public (EIP). The date for the EIP has not yet been set and will not be known until after the plan is submitted to the Planning Inspectorate. The Council consider that the Plan has been positively prepared, is justified through the evidence base, is effective and is consistent with national policy.</p> <p>In preparing the Local Plan the Council have worked collaboratively with neighbouring Local Authorities, Surrey County Council and various other partner organisations. However, it will be for the Planning Inspector to determine whether the Council has passed the Duty to Co-operate.</p>
<p>Evidence base:</p> <ul style="list-style-type: none"> • Significant questions over the evidence base prevent being able to say whether the plan is sound or not • SHLAA is unsound and assessment of sites is not consistent (evidence) • Contrary to, Plan is being progressed ahead of determining OAN (absence of key evidence) • Community haven't voted for these homes, they are being forced upon people. • Not based on an up to date SHMA (evidence) • GBCS based on an unsound methodology (evidence) • Does not comply with Para 47 of the NPPF (...to significantly boost supply) or the SHMA 	<p>The evidence base has been refreshed following the previous consultation on the Draft Local Plan and is considered to be up-to-date and robust. The evidence base will be scrutinised by the Planning Inspector at the EIP and used to determine whether the plan is sound.</p> <p>The objectively assessed need for the borough has been determined in the West Surrey Strategic Housing Market Assessment (published September 2015). The methodology used for calculating the objectively assessed need is outlined in the SHMA and is considered to be sound. The assessed need has informed the housing target set out in the Local Plan. Further detail about the SHMA is provided in the table for Appendix C: Evidence Base.</p>

Issue	Guildford Borough Council Response
<ul style="list-style-type: none"> • Evidence not appropriately applied <p>Sustainability</p> <ul style="list-style-type: none"> • NPPF 3 strands of compliance, sustainable, economic, social • Of the 12 core principles set out in NPPF 17, policy 1 disregards at least 7 of these • GBC seems to have forgotten the crucial element of sustainability • Fails to meet core principals of NPPF • GBC have had little regard to planning principles contained in the NPPF relating to: ‘Empowering local people; ‘Recognising the intrinsic character and beauty of the countryside and supporting thriving communities within it’; ‘Taking account of the different roles and character of different areas’; ‘conserving and enhancing the natural environment and reducing pollution’; ‘Encouraging the effective use of land by reusing land that has been previously developed (Brownfield land); ‘Conserving heritage assets’; Managing growth to make fullest possible use of public transport, walking and cycling and focus significant development on locations which can be made sustainable. 	<p>The Local Plan: strategy and sites document provides strategic policies and an overarching vision for how the Council will meet its objectively assessed needs whilst conserving the borough’s distinctive natural and built environment. The plan promotes development which will provide economic, social and environmental benefits to the existing and future populations. Policies and site allocations included in the plan recognise the special qualities of the borough and outline how these features will be protected, identify and respond to the specific roles of different settlements and sites in the borough and actively promote the development of brownfield land and a number of strategic sites. The use of public and other sustainable modes of transport is also promoted in various policies of the plan.</p> <p>Having made these points, it is important to be clear that plan-making inevitably involves addressing competing objectives and there can be no such thing as a plan that is ideal in every respect (i.e. a plan that ‘pleases everyone’). In order to ensure that the best balance is struck, and therefore sustainable development achieved, the Council has employed Sustainability Appraisal to scrutinise the emerging plan against a range of objectives, and also explore alternative scenarios.</p> <p>The plan is committed to delivering sustainable growth of the borough. However, as the NPPF specifies that Local Plans should not copy or repeat it directly, the twelve core principles of the NPPF are not directly quoted in the Local Plan: strategy and sites document.</p>
<p>NPPF states that agricultural land should not be used for housing</p>	<p>Paragraph 112 of the NPPF states that Local Planning Authorities should consider the economic and other benefits of the best and most versatile agricultural land. The paragraph goes on to state that where significant development is considered to be necessary on agricultural land, local planning authorities should seek to use areas of poorer quality land. The NPPF does not state that agricultural land should not be used for residential development.</p>
<p>Policy 8 does not protect the views into and out of the AONB and is therefore not compliant with the NPPG</p>	<p>This issue is addressed in the policy 8 comments table. However, to reiterate the point, policy 8 makes clear that development which does not respect the setting and/or views of the AONB will not be approved. Development proposals in the AGLV will be subject to similar principles to ensure that they respect the setting and character of both the AONB and ALGV.</p>
<p>Does not take into account paragraph 119 of the NPPF- presumption in favour of sustainable development does not apply when Birds or Habitats Directives is being considered, planned or determined. Obligations to Protect biodiversity and to reduce the quality of legally protected sites (SPAs, SACs, SSSIs)</p>	<p>Policy 1 of the draft Local Plan strategy and sites 2014 and Policy S1 of the ‘Proposed Submission Local Plan: strategy and sites’ 2016 both refer to the presumption in favour of sustainable development contained in the NPPF. This includes the caveat presented at paragraph 119.</p>

Issue	Guildford Borough Council Response
	<p>A response to the point regarding the protection of biodiversity is provided in a later (policy 19) comments table. However, it should be reiterated here that the plan will seek to protect and conserve the borough's biodiversity in line with national and European legislation.</p> <p>Policies I4 and P5 in the proposed submission Local Plan protect designated sites including the SPA.</p>
<p>Green Belt:</p> <ul style="list-style-type: none"> • Ignores the green belt as a constraint (Brownfield assessment) • Have not demonstrated exceptional circumstances • Doesn't comply with the NPPF and its direction on green belt 	<p>These comments have been responded to in the table for Policy 10</p>
<p>Doesn't protect the AONB</p>	<p>Policy 8 outlines the Council's approach to development proposals in the AONB and AGLV. In accordance with the NPPF, the area will be awarded the highest level of protection in terms of landscape and scenic beauty.</p>
<p>The strategy is not balanced need to constraints</p>	<p>The document attempts to balance the development needs of the borough with protecting our special natural environment. We have attempted to do this through a controlled realignment of the green belt boundaries and development of a small number of strategic sites on the urban fringe.</p>
<p>New draft does not reflect the SA from the Issues and options</p>	<p>The 2014 draft plan was developed in light of earlier work, undertaken in 2013 at the 'Issues and Options' stage, to appraise spatial strategy alternatives. This process was explained in Chapter 3 ("What has plan-making / SA involved up to this stage") of the 2014 Interim SA Report. Equally, it is the case that the current 'proposed submission' version of the plan has been developed taking into account earlier SA work (specifically appraisal work undertaken at the Issues and Options stage in 2013, appraisal work undertaken at the Draft Plan stage in 2014 and work in early 2016 to explore revised spatial strategy alternatives).</p>
<p>Insufficient detail of scale, form and location</p>	<p>The site allocations section of the 'Proposed Submission Local Plan: strategy and sites' outlines the locations where development will be considered appropriate during the plan period. Details of acceptable uses and other key considerations development proposals must take account of are provided for each allocated site. Planning applications for development at these sites will need to comply with the policies of the proposed submission local plan including policies six and seven which are concerned with the form and design of development. Proposals will also need to comply with detailed design policies that will form part of the forthcoming Local Plan: Development Management Policies DPD.</p> <p>All site allocations require planning permission prior to development. Allocating sites does not grant planning permission for development, however, it does identify the principle of development and uses.</p>

Issue	Guildford Borough Council Response
Insufficient consideration of cumulative impact (para 174 NPPF)	The Local Plan Viability and Affordable Housing Study has considered the cumulative impact of policies and standards and has found that these would not prevent planned development from being delivered
Consultation processes on the Issues & Options were not properly dealt with thus failing to demonstrate engagement and take on board comments	Comments from the Issues and Options consultation and Draft Local Plan consultation have been utilised to inform and revise the approach and policies of the proposed submission Local Plan. A 'Statement of Community Involvement' will be submitted with the 'Proposed Submission Local Plan: strategy and sites' to the Planning Inspectorate to illustrate how we have engaged with our community and utilised the feedback received to inform the plan making process.
No IDP	The IDP will be released alongside the publication (Regulation 19) Local Plan: strategy and sites to explain how the required supporting infrastructure will be delivered.
GBC has taken a pragmatic approach to development in trying to meet needs for the area	The plan attempts to balance the borough's development needs with protecting the natural environment.
Does not meet housing need or follow the presumption for sustainable development (aka: why is my land not included in the development plans?)	Comments relating to the evidence base are responded to in the table for Appendix C: Evidence Base. However, the housing target outlined in the Proposed Submission Local Plan is based on the Objectively Assessed Need determined within the West Surrey SHMA. The Land Availability Assessment has helped identify sites which are available, suitable and deliverable for development during the plan period. Larger sites considered appropriate for development during the plan period are identified as allocations within the Proposed Submission Local Plan. The LAA identifies all sites contributing towards supply and an allowance for windfall sites and rural exception sites. The 'Proposed Submission Local Plan: strategy and sites' meets the OAN.
Does not meet infrastructure constraints in accordance with NPPF and NPPG	The Local Plan Infrastructure Schedule sets out the key infrastructure needed to support the planned development. The Infrastructure Schedule will be updated as further detail on supporting infrastructure projects is available. Developer contributions and other funding sources will be used to ensure that key infrastructure is delivered when it is needed, including at the planning application stage.
Not in line with Planning Strategically Across Boundaries (MVDC)	The Council has collaborated with neighbouring local authorities and partner organisations to address cross-boundary issues including housing and economic market areas. However, it will ultimately be the Planning Inspector's decision to ascertain if we have met the Duty to Co-operate.
The Secretary of State has made it clear that traveller sites are not appropriate in the GB	Comments relating to the green belt are responded to in detail in the table for policy 10. The NPPF and Planning Policy for Traveller Sites (PPTS) state that Green Belt boundaries may be amended in exceptional circumstances. PPTS states that this can include inseting a site to meet a specific, identified need for a Traveller site.
Housing in rural areas should reflect local need	Policy 5 of the 'Proposed Submission Local Plan: strategy and sites' sets out the

Issue	Guildford Borough Council Response
	<p>Council's approach to rural exception housing. The policy is designed to enable small housing development in rural areas which meets local need in the village or Parish (as demonstrated by a recent parish housing needs survey).</p> <p>More detail about local rural needs housing is provided in Policy 5 : Rural Exceptions Housing.</p>
<p>Policies in the plan are weak/imprecise/woolly. They should set out requirements clearly as per NPPF 154. The DLP is a developer's charter.</p>	<p>The policies of the 'Proposed Submission Local Plan: strategy and sites' have been updated since the previous consultation to take account of comments received from the public and various statutory consultees. The policies are primarily strategic (rather than detailed development management policies) but provide a clear indication of how a decision maker should react to a development proposal, as is required by paragraph 154 of the NPPF. Paragraph 154 of the NPPF also requires Local Plans to be aspirational but realistic and set out clear opportunities for development. The objectives of the plan are considered to be both aspirational and achievable whilst the site allocations and policies of the plan clearly identify opportunities for development.</p>
<p>It is not clear why Guildford is proposing a 20 year plan when NPPF 157 states that a 15 year plan is preferable. Planning for 20 years requires more land to be made available for development.</p>	<p>The NPPF requires that we should plan for 15 years post adoption. Given our timetable this means that the plan period should look to 2033. The base date of 2013 is due to the fact that our evidence base which assesses our employment and housing need is base dated 2013 to reflect the mid-year population estimates that were available at the time of preparation.</p>
<p>The plan is being forced on by the government. This should be challenged.</p>	<p>The Government have stated that all Local Planning Authorities should have an up-to-date Local Plan in place by early 2017. The 'Proposed Submission Local Plan: strategy and sites' has been devised by the Council based on the principle of sustainable development and informed by a substantial body of documents known as the evidence base. The plan aims to meet the borough's objectively assessed needs whilst recognising the constraints to development and the need to protect the special natural and historic environment of the area.</p>
<p>The timetable for the plan is extremely cramped/rushed and this seems to have affected thoroughness/robustness</p>	<p>The Government have stated that all Local Planning Authorities should have an up-to-date Local Plan in place by early 2017. The Council's Local Development Scheme sets out the timeframe in which we intend to adopt the plan. The timeframe is considered to be suitable for producing a sound plan which reflects local circumstances and is capable of passing examination in public.</p>
<p>The Local Plan needs to be drawn up in collaboration with neighbourhood groups under the Localism Act.</p>	<p>The Council has met and exceeded planning legislation by previously undertaking public consultations on the 'Issues and Options' paper and the 'Draft Local Plan: strategy and sites'. These consultations gave members of the public, statutory consultees and other organisations (including neighbourhood groups), the opportunity to comment on the emerging Local Plan. Comments obtained from the consultation have been considered by the Council and used to revise our proposed</p>

Issue	Guildford Borough Council Response
	policies and site allocations. The Proposed Submission Local Plan: strategy and sites will also undergo a six week consultation, providing neighbourhood groups further opportunities to comment on the Council's emerging Local Plan.

11. Comments on the Consultation Questionnaire: Question 3 Sustainability Appraisal and Habitats Regulations Assessment

Issue	Guildford Borough Council Response
<p>Most Popular Question 3a themes</p> <ul style="list-style-type: none"> • It is not a transparent, thorough nor meaningful assessment and does not justify the draft plan • Publishing SA for only six-weeks halfway through the Local Plan consultation gave insufficient time to consider it, doubt as to how it has informed the preparation of the draft plan, and a lack of transparency • Plan as a whole is not sustainable • Impact of proposed development on already stretched infrastructure, would be unsustainable. Need to sort out existing infrastructure problems first • Emphasis on economic growth is disproportionate to the detriment of social and environmental issues • Too much housing planned (a 20% population increase) will have a harmful impact on the environment • Need to balance sustainable growth with protecting the environment • Level of planned development in the borough will worsen road congestion • Object to no brownfield first policy Only about 43 per cent of development is planned on brownfield land • We do not consider that the Council has undertaken the necessary SA testing of housing ranges or delivery strategies to inform the strategy; for example no scenario of no greenfield use was tested • This is likely to be the major source of air pollution in the borough, but no mitigation is proposed in the draft plan • Wisley Airfield has SSSI and European legislation protection it is not sustainable 	<p>SA is a process that is being undertaken alongside plan-making. Early work (which was not required by legislation, i.e. undertaken voluntarily) involved developing and appraising alternative spatial strategies, and appraising the Draft Plan 2014. This early work has fed-into plan-making, and also has fed into the development of refined spatial strategy alternatives for further SA. Refined spatial strategy alternatives have recently (2016) been appraised, in time to feed into finalisation of the Proposed Submission Plan. It is in these ways that SA has fed into, informed and helped to 'justify' the Proposed Submission Plan. Furthermore, the SA Report will be published alongside the Proposed Submission Plan and as such will help to ensure an effective consultation, and ensure that subsequent plan finalisation (at Examination) is suitably informed.</p> <p>With regards to the spatial strategy alternatives that have been considered (e.g. reference comment received: <i>"We do not consider that the Council has undertaken the necessary SA testing of housing ranges or delivery strategies to inform the strategy; for example no scenario of no greenfield use was tested"</i>) readers are directed to Chapter 6 ('Developing the reasonable alternatives') within Part 1 ('What has plan-making / SA involved up to this point?') of the SA Report. Here readers will see a detailed discussion of the 'thinking' that went into the establishment of 'reasonable' spatial strategy alternatives in early 2016. Ultimately, there are myriad alternatives that could be appraised in theory, but there is a need to minimise the number in practice in order to ensure accessibility (and therefore encourage debate, remembering that SA is as much about supporting effective consultation as it is technical analysis). We have sought to ensure that the spatial strategy alternatives vary in terms of key, strategic sites (including Wisley Airfield).</p> <p>With regards to the substance of appraisal findings, the primary point to note is</p>

Issue	Guildford Borough Council Response
	<p>that the appraisal has been guided by the agreed 'scope' (which was established through earlier consultation). Having said this, the SA scope is amendable and has been updated to reflect comments received in 2014. For example, there is now a more explicit focus on groundwater, to reflect Environment Agency representations; and the evidence base in respect of agricultural land has been supplement to reflect Natural England representations. Chapter 4 of the SA Report introduces the SA scope, and explains how it has been updated post 2014.</p> <p>The other point to highlight, regarding the substance of appraisal findings, is that the SA does not aim to conclude on 'how sustainable' the plan is, or a given option (e.g. spatial strategy option) is; rather, the aim of the SA is to examine the plan/options in terms of various issues/objectives in turn, and in doing so to highlight pros and cons. It is inevitably the case that the plan (and any given spatial strategy option) will be associated with pros and cons (i.e. involve 'trade-offs' between competing objectives) and ultimately it is only the Council - informed by SA, consultation responses and technical evidence - that can decide on an approach that is best / most sustainable.</p> <p>Finally, with regards to representations received in respect of the substance of site options appraisal, the first point to make is that we have applied strict quantitative 'GIS' (i.e. distance/overlap) criteria, and there has been no potential to apply qualitative analysis. This is a proportionate approach to take through the SA, as the focus of SA has been on appraising spatial strategy (and other strategic policy) alternatives, rather than site options (i.e. site options appraisal is a means of arriving at spatial strategy alternatives, rather than an end in itself). Given a reliance on quantitative analysis, our focus has been on ensuring that the data-sets that we apply (e.g. datasets showing the extent of European designated sites) are accurate, and generally sense-checking the outputs of the analysis. We have done these things.</p>
Due consideration has been applied	Appraisal work - in relation to both the draft plan and 'reasonable alternatives' has been guided by the established 'SA scope' (see further discussion in Chapter 4 of the SA Report). Also, it is important to note that due consideration has been applied when establishing 'reasonable alternatives', as discussed in Chapter 6 of the SA Report.
You have taken a lot into account as needed	Comment noted. SA is an opportunity to 'take a step back' and 'cast the net wide' in terms of issues/impacts.
Unable to access this on website	The 2014 Interim SA Report was available for the final six weeks of the consultation only. The Council accepts that this was a non-ideal situation, but would also point out that the 2014 Interim SA Report was produced voluntarily (i.e. was not produced

Issue	Guildford Borough Council Response
	in order to comply with any regulations or guidance). The only requirement is that the SA Report is published alongside the Proposed Submission version of the plan (under 'Regulation 19').
Too complex for a lay person to answer; how can they understand sustainability and habitats regulation adequately to comment?	The SA Report is structured in four clear 'parts' in order to aid accessibility. – Part 1 answers the question "What has Plan-making / SA involved up to this point?" and in particular explains the work that has been undertaken in respect of alternatives appraisal. – Part 2 answers the question "What are the SA findings at this stage?" by presenting an appraisal of the draft plan – Part 3 answers the question "What happens next?"
The SA is not consistent with the accepted Bruntland definition of Sustainable Development	SA is a mechanism for considering and communicating the likely effects of a draft plan and alternatives, in terms of a range of sustainability issues/objectives (as established through scoping) with a view to avoiding and mitigating adverse effects and maximising the positives. The aim is to inform plan-making both directly (i.e. appraisal informs plan-makers) and indirectly (i.e. appraisal informs consultation, and in turn plan-makers).
More information needed regarding planned social infrastructure, schools, doctors, hospitals	Appraisal work (and work to develop reasonable alternatives) has been undertaken in recognition infrastructure capacity/delivery is a key issue locally. Work in 2016 has taken account of recent improvements in evidence-base / understanding.
There are a number of inconsistencies in the narrative, examples given	New spatial strategy alternatives were developed and appraised in early 2016, and it should be the case that the appraisal narrative is of a suitably high quality. With regards to the appraisal of the draft plan, whilst the current appraisal narrative (see 'Part 2' of the SA Report) builds-upon the equivalent narrative from 2014, efforts have been made to add detail and improve quality (e.g. with more explicit reference to evidence, including evidence gathered through consultation).
<p>Flawed data so the conclusions of the SA cannot be relied on.</p> <p>For example, SA Appendix B data for site 74 is incorrect : The site is closer to SPA than 5km, it is 1500m to primary school, 5250m to secondary school, 940m to GPs surgery, and 1790m to recreation facilities</p> <p>Walking distances to the nearest schools should not include independent schools</p> <p>Land at New Pond Road - local shops located on Green Lane are closer than the 2890 metres to shops on Farncombe Street</p> <p>West Horsley sites 70 to 73, the figures do not concur with those in the Settlement Hierarchy which is a matter of concern Site 73 – Land west of West Horsley (south) is rated as lowest flood risk but it regularly floods, making Ripley Lane impassable</p>	Appraisal of site options in isolation is a relatively minor step in the SA process, with appraisal of spatial strategy alternatives being a more important step (i.e. a step taken in order to discharge the legal requirement to appraise 'reasonable alternatives'). As such, a proportionate approach was taken to the appraisal of site options that involved applying strict quantitative 'GIS' (i.e. distance/overlap) criteria only (i.e. no qualitative criteria were applied). Given a reliance on quantitative analysis, our focus has been on ensuring that the data-sets that we apply (e.g. datasets showing the extent of European designated sites) are accurate, and generally sense-checking the outputs of the analysis. We have done these things.

Issue	Guildford Borough Council Response
<p>Matrix at page 135 is factually incorrect in respect of Site 66 Former Wisley Airfield</p> <ul style="list-style-type: none"> • Refers to allocation of 2500 when draft policy 66 shows 2150 homes • The site is predominantly agricultural land - under one fifth has hard surfaces • States site is 1600m from the SPA; the boundary of the northern edge is 400m from the SPA • more than 55% of the data is undeniably false, alarmingly on key issues such as proximity to SPA • The FWA is predominantly agricultural land - under one fifth has hard surfaces. overall on the FWA this amounts to 67.5 ha of Grade 4 agricultural land⁷ <p>Site 116 Proposed SANG for Wisley - Noted as next to recreation facility as a positive, presumably this being the SPA, which is to be avoided The majority of the land is agricultural and is identified as Grade 4 at eastern end. The SA was undertaken on the basis of the combined draft Site Allocations 66 and 116 with a total area of 105 ha of land, of which 39 ha is shown as SANG The GBCS expressed serious doubt about the capacity of the site to accommodate a sustainable new settlement, assumed that 115 ha of land would be available</p>	
<p>Water stress is identified as an issue, yet the draft Local Plan has failed to be taken into account the need for new reservoirs</p>	<p>Whilst the SA framework lists 'water quality / resources' as an issue to take into account when appraising the draft plan and alternatives, we are not aware that 'the need for new reservoirs' is an issue for the Local Plan.</p>
<p>Lack of rigour in the analysis, particularly in relation to SANG as mitigation for impact on the SPA</p>	<p>It is appropriate for the SA to make careful assumptions regarding the potential for SANG to mitigate impacts. These matters are explored in more detail through the HRA.</p>
<p>Difficult to evaluate and comment without housing numbers and infrastructure proposals</p>	<p>The draft plan / alternatives that have been a focus of appraisal are defined in terms of housing numbers and distribution, with infrastructure implications also a key consideration.</p>
<p>The SA has not given a full appraisal of the proposed strategic sites for development and potential alternative sites not included in draft plan by which to judge which are more sustainable</p>	<p>As discussed in Chapter 6 of the SA Report, careful thought was given to the development of alternative spatial strategies - i.e. alternative approaches that might be taken to the allocation of land for housing - in early 2016. This 'reasonable alternatives' ultimately established were then appraised, and appraisal findings can be seen in Chapter 7 of the SA Report.</p>
<p>The Royal Surrey Hospital will be impacted as increased road traffic will lead to a delay in emergency patient transfer times</p>	<p>Comment noted. This is an issue to take into account as part of the appraisal of the draft plan and alternatives.</p>
<p>The water table is only 10 inches below ground level on properties in Tannery Lane, so land in the area is not suitable for development</p>	<p>This is an issue that should be raised in relation to any development proposals in this area.</p>
<p>pg 61 statement Error! Reference source not found. B of his SA Report' [sic] pg 63 "Any deveopment of over five dwelligns" [sic]</p>	<p>Comment noted.</p>

Issue	Guildford Borough Council Response
"should provide 40% affordable housing. The aggregate amount of" [sic]	
Blackwell Farm development : No satisfactory traffic solution without damage to the AONB No reference to the A3/A31 traffic issues already present	Comment noted. This is an issue to take into account as part of the appraisal of the draft plan and alternatives.
Effingham's' natural spring line and flooding have not been considered	A Strategic Flood Risk Assessment (SFRA) is available to inform plan-making and SA.
Parking on Effingham Common will destroy the environment	Impacts to designated common land is an issue to consider through plan-making and SA.
Building on Green Belt is not sustainable	This point requires elaboration. Whilst building on Green Belt inevitably leads to negative impacts in terms of certain issues/objectives, it can be warranted.
The methodology biases against advantages of cumulative sites within the smaller settlements Object to one of the criteria used : Whether the site would provide for 1,000 dwellings or more. No logic has been applied when setting this threshold	Comment noted. There is a need to apply caution when making assumptions regarding the likely benefits of larger developments, and clusters of developments at a given settlement.
Unclear what the colour coding means, and why large sites over 0.5ha are coloured red, is it better to allocate a larger site?	The criteria / rules applied as part of site options appraisal are carefully explained. Yes, it is the case that larger developments can bring with them certain benefits, e.g. in terms of affordable housing and infrastructure delivery.
The strong economy leads to development pressure in an area with a number of environmental constraints, including SPA and AONB	Yes, agreed. This is a matter that goes to the heart of the plan and the SA.
Since 1995 average house prices in the Borough have tripled and exceed other average house price increases in the south east. Affordability is a recognised problem and additionally there is a deficit in meeting housing supply. The Council needs to supply sufficient housing of a suitable mix as well. Affordability is affecting some householders who are unwilling to move house but then cannot develop their homes in a way which meets contemporary standards in terms of housing size and sustainable quality.	Comment noted. These are all issues to consider when appraising the draft plan and alternatives in terms of 'housing'.
<p>Environmental sustainability will not always be compatible with the economic growth</p> <p>Plan should set local targets for the reduction of CO2 emissions, including the aim of "becoming carbon-free by 2040".</p> <p>Need to aim to foster a "green economy, focusing policies, investments and spending towards clean technologies, renewable energies, green transportation, waste management and green buildings.</p> <p>The University and the Research Park could play a major role in this by orientating some of their research activities towards renewable energy and environmental technology leading to the emergence of businesses in these fields.</p> <p>See example of its twinned town of Freiburg, which is now one of the world's greenest cities.</p>	The SA has an explicit focus on appraising the draft plan (and alternatives) in terms of climate change mitigation objectives. Various sources of evidence (e.g. measures promoted through the NPPF, and measures promoted through consultation) have been drawn upon. It is not clear, however, whether there is a strategic opportunity associated with the University / Research Park that the Local Plan should be seeking to capitalise on.

Issue	Guildford Borough Council Response
<p>A new issue should be added under Objective 2 – requiring significant improvement in provision of safe walking and cycling routes. This is already needed without the planned housing.</p> <p>Encouraging more people to cycle and walk regularly is far more effective than developing "sports and leisure facilities", which by focussing on profit-making activities will "lock out" those on lower incomes</p>	<p>Agree. An issue has been added to the SA Framework.</p>
<p>The document only considers the impact to a SPA, it fails to consider the impact to SACs or to SSSIs</p>	<p>All three types of designated site have been the focus of SA.</p>
<p>There should be discussion with Natural England and Enterprise M3 about revising the approach to mitigating the risk of disturbance to the bird habitat. It is highly unsatisfactory that the protected bird population information is confidential</p>	<p>The HRA deals with this matter in detail.</p>
<p>Keith Holland, senior planning inspector told a meeting of councillors in Essex that councillors would not be forced to release Green Belt. "We will never go to an examination and say to an authority you must use Green Belt land to accommodate your development</p>	<p>This is a matter for the plan.</p>
<p>Loss of land in agricultural use is not sustainable</p>	<p>This point requires elaboration. Whilst building on agricultural land inevitably leads to negative impacts in terms of certain issues/objectives, it can be warranted.</p>
<p>The three strategic sites of Blackwell Farm, Gosden Hill and the Former Wisley Airfield are all either wholly, or in the main grade 3 agricultural land. We do not understand therefore why this appears not to have been taken into account.</p>	<p>Agricultural land quality has been taken into account through plan-making and SA. New evidence has been gathered since 2014.</p>
<p>No proper evaluation of whether sustainable transport objectives will be fulfilled</p>	<p>The SA framework includes an objective dedicated to this topic.</p>
<p>No sustainable transport mitigation proposed</p>	<p>Mitigation measures arising from the appraisal of the draft plan are discussed within Part 2 of the SA Report.</p>
<p>Studies by SCC and GBC (SCC's "draft Surrey Future Congestion Programme" 2013 and GBC's "Air Quality Progress Report" June 2013 have not been taken into account. They indicate that a proposed new settlement t Wisley airfield would be inappropriate in relation to traffic congestion and air pollution. This is due to location close to already heavily congested trunk road, unlikely to encourage sustainable travel choices</p>	<p>Comment noted. Evidence in relation to air quality issues at Wisley airfield has been taken into account through plan through plan-making and SA; however, it is noted that no Air Quality Management Areas (AQMAs) are designated in the Borough.</p>
<p>More sustainable outcomes will be achieved with a Local Plan in place.</p> <p>A table summarising the agent's SA assessment of Land at Wisley airfield is submitted.</p> <p>Assessment is against each of the Borough Council's sustainability objectives as set out in their Interim SA.</p> <p>As the Council has focused on more of a spatial analysis rather than qualitative, Wisley Property Investments have found it difficult to respond to each of the objectives in turn</p>	<p>The possibility of a new settlement at Wisley Airfield is one of the key variables reflected in the spatial strategy alternatives developed and appraised in 2016 (see Chapters 6 and 7 of the SA Report).</p>
<p>Site 71, Manor Farm West Horsley is not sustainable.</p>	<p>Evidence-base in relation to the issues/opportunities at West and East Horsley are</p>

Issue	Guildford Borough Council Response
East Lane is too narrow for more traffic, local shops, medical services and the station car park are already at full capacity	available from a number of sources. It is recognised that there are issues in respect of the capacity of the local road network.
The document needs to explain the weightings used to avoid just seeming subjective	SA does involve using professional judgement, rather than strict application of weighting. Ultimately, the aim is to appraise the draft plan and alternatives in terms of the SA Framework (i.e. a list of sustainability topics/objectives/issues).
Site 62 – too many homes planned here will increase congestion and cause flooding	Traffic congestion impacts can be difficult to quantify with certainty, but the SA will highlight issues/impacts where possible. With regards to flood risk, there is a need to rely on the published SFRA.
Local Plan is based on Corporate Plan which was not adequately consulted on	This is not an SA issue.
<p>Certain of the safeguarded land (and in some instances land adjacent to the safeguarded allocations) is more sustainable to develop than some of the allocated sites.</p> <p>Hunts Farm and Hook Farm, Fairlands (GBCS PDA H8) – Sustainability Assessment of the land submitted by Miller Developments</p>	The intension is no longer to consider the safeguarding of land.
<p>Liddington Hall (Site 62) is proposed for a what is tantamount to a small village. This Green Belt site has been refused planning permission by the Council several times in the last 40 years.</p> <p>In 2003, the Officer Report to the Executive on the Deposit Draft Surrey Structure Plan 2002 stated:</p> <p><i>"The findings thus far suggest that the transport impacts associated with the north west community [Site 62 - the Liddington Hall site] would be significant and difficult to resolve</i></p> <p>Why has this factor not been taken into account in the Draft Local Plan, and what has made the Council change its mind about suitability for housing.</p>	Comment noted. Transport is understood to be an issue in relation to this site.
Assessment of the Wisley former airfield site against the SA objectives, by the site promoters	The SA has sought to appraise individual site options in isolation using strict quantitative 'GIS' (i.e. distance/overlap) criteria only (i.e. no qualitative criteria were applied). Qualitative appraisal has been applied through the appraisal of spatial strategy alternatives (see Chapter 7 of the SA Report) and through the appraisal of the draft plan (see Part 2 of the SA report). As part of qualitative appraisal, careful attention has been paid to ensuring that all available evidence in relation to Wisley Airfield is taken into account.
Natural England disagrees with the conclusions reached by the HRA and SA and advise that the plan is unsound on this basis	Upon reading the SA Report - i.e. the report published alongside the Proposed Submission Plan in-line with Regulation 19 of the Local Planning Regulations - Natural England should find that their concerns have been addressed.
Guildford Borough Council does not appear to have used sufficiently detailed site selection criteria in the SA to inform decisions	Much work has been undertaken to develop and appraise spatial strategy alternatives, so that the final decision on a preferred spatial strategy might be

Issue	Guildford Borough Council Response
	suitably informed. With regards to the criteria applied through the appraisal, the SA Framework (see Chapter 4 of the SA Report) was developed through a stand-alone 'scoping' process (which included consultation, as per statutory requirements).
No justification for Tongham Triangle site be allocated for employment rather than housing	This is not an SA matter.
See St Albans v SofS (2010) for assessing reasonable alternatives. Guildford's SEA has not included assessment of alternative of no greenfield development	Careful consideration has gone into the development of reasonable alternatives, as discussed within Chapter 6 of the SA Report. There is no 'reasonable' need to formally appraise a 'no greenfield' option.
SEA Regulations, Annex 1 sets out information required, and the extent to which Guildford's SA meets these requirements	Appendices 1 and 2 of the SA Report explain how regulatory requirements have been met.
Surrey Wildlife Trust (for Wey Valley Partnership) The SA refers to SINC, which is the equivalent term for local wildlife sites used in Greater London Green Infrastructure Strategy needed for draft Policy to be redrafted	Comment noted. The correct term is Site of Nature Conservation Importance (SNCI).
I wish to register an objection to the this sustainability appraisal, which is a flawed document, repeating many of the errors earlier consultants have made. A review of the appraisal carried out with regard to site 69, which was deeply flawed.	The SA has sought to appraise individual site options in isolation using strict quantitative 'GIS' (i.e. distance/overlap) criteria only (i.e. no qualitative criteria were applied). Qualitative appraisal has been applied through the appraisal of spatial strategy alternatives (see Chapter 7 of the SA Report) and through the appraisal of the draft plan (see Part 2 of the SA report).
<p>Natural England is concerned that the Sustainability Appraisal has not demonstrated that there are not alternative sites to Site 66 Former Wisley airfield, that are less harmful to the natural environment to allocate for development than this site.</p> <p>NPPF Para 152 clearly states that significant adverse impacts should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued</p> <p>We are concerned that, given the scale and proximity to the SPA of the development, the proposed mitigation will not be effective.</p> <p>It is also unclear in the Local Plan, HRA and SA how the nearby roads will cope with such a large increase in traffic as a result of this allocation and whether any new link roads, road widening schemes may be required to facilitate this development. Any new road schemes in this location may impact TBHSPA and Ockham and Wisley Commons SSSI due to direct land take. We therefore require further information on this aspect.</p> <p>Based on the mitigation proposed within the Local Plan a likely significant effect on the Thames Basin Heaths Special Protection Area (SPA) cannot be excluded.</p>	Of the seven spatial strategy alternatives developed in early 2016, three involve nil growth at Wisley Airfield.

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<p>NPPF Para 152 clearly states that significant adverse impacts should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued</p>	
<p>Soil and Agricultural Land Quality –</p> <p>Assessment of Grade three agricultural land has not been carried out, some quality farm land has been included in the plan</p> <p>The SA will need to demonstrate that Guildford BC have sought the use of lower quality land (i.e. non BMV) in preference of that of higher quality (grade 1, 2 and 3a) in line with para 112 of the NPPF.</p> <p>The Sustainability Appraisal has not provided evidence that lower quality agricultural land has been allocated in preference to higher quality (grade 1, 2 and 3a).</p> <p>Natural England has provided an example of how it expects and adequate assessment to be carried out in order to give Best and Most Versatile Agricultural Land (BMVAL) proper consideration in the SA.</p> <p>Where no reliable information is available, it would be reasonable to expect developers to commission a Agricultural Land Classification (ALC) survey for any sites they wished to put forward for consideration in the Local Plan.</p> <p>Natural England is happy to support Guildford through this process of collating evidence and would be happy to meet in Guildford to discuss BMV agricultural land issues further.</p>	<p>In light of Natural England’s concerns, new evidence base studies were commissioned and have been taken into account. We would encourage Natural England to promote a consistent approach nationally.</p>
<p>Whilst Natural England has not assessed the SA in detail, it has raised sustainability issues which will need to be reflected in the next version of the SA</p>	<p>Upon reading the SA Report - i.e. the report published alongside the Proposed Submission Plan in-line with Regulation 19 of the Local Planning Regulations - Natural England should find that their concerns have been addressed.</p>
<p>The Environment Agency generally agrees with the assessment of the Sustainability Appraisal although we believe that certain topics have been overlooked and other issues could be further explored to assess the potential impact of the plan.</p>	<p>The SA framework has been supplemented to reflect the EA’s concerns, e.g. in respect of groundwater.</p>
<p>The Interim Sustainability Appraisal (SA) notes that Guildford is not subject to regular severe flooding.</p> <p>The Environment Agency (EA) refutes this statement.</p> <p>Guildford has experienced significant flooding in 1900, 1928, 1968, 2000, 2006, 2013 and 2014.</p> <p>362 properties and 8 communities at risk from fluvial flooding in Guildford borough have been identified.</p>	<p>The SA framework contains an objective relating to ‘flood risk’, and the list of issues to take into account ‘under’ this objective heading has been supplemented to reflect EA’s concerns (e.g. in relation to climate change implications). We would also highlight that SFRA is available to inform appraisal work. Finally, with regard to otters in the River Wey, the SA framework has been supplemented with a reference to Biodiversity Opportunities Areas (BOAs; of which the River Wey is one).</p>

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<p>The Council has also published two draft Surface Water Management Plan for the areas of the borough acknowledged to suffer from the most severe / frequent surface water flooding.</p> <p>The EA recommends that the SA considers the impact of the forthcoming local plan policies and potential allocations with regards to flood risk. This should be included as a key issue in the SA and within the local plan.</p> <p>As the borough has substantial flood risk issues arising from various sources, the new Local Plan needs a local strategic flood risk policy in order to assess planning applications, rather than simply relying on the NPPF and its evidence of the SFRA 2009 and the Flood Risk Reductions Measures document 2010.</p> <p>The EA welcomes that Water Quality is identified as a key issue within the SA, although water quality should not just focus on river quality as indicated on page 11 (PDF page 52) but should refer to all waterbodies as required by the European Water Framework Directive (WFD).</p> <p>Alternative wording suggested for parts of the SA.</p> <p>Section on biodiversity – evidence of otters recently been found within Guildford Urban Area, especially in Slyfield Industrial Estate and Burpham Court Farm</p>	
Nuthill Farm should be included as part of site 59 (Gosden Hill Farm)	This is a matter for the plan
<p>Concerns about testing of GBCS PDA K3 now proposed for Green Belt (previously residential) through the SA</p> <p>See Bell Cornwall's (Jane Terry) response for GBCS PDA K3</p>	The approach at Ash/Tongham is one of the variables reflected in the spatial strategy alternatives developed in early 2016. See Chapter 6 of the SA Report.
<p>It has only been possible to have a superficial examination of the Assessment, although we have read the summary. It appears that the document supports the Council's approach with little or no question.</p> <p>For example, the summary of appraisal findings on pages 13 to 17, only makes a comment on affordability in relation to housing growth, but gives no comment on possible adverse impacts.</p>	The discussion of the 'affordability' effects of the draft plan's housing strategy, on page 13 of the Interim SA Report Non-technical Summary, is presented under the 'Housing' SA topic heading. The appropriate place to discuss adverse effects of the draft plan's housing strategy is under other topic headings (e.g. 'Cultural heritage and landscape')
<p>On transport, the comment is that the proposals should help to provide better interconnectivity, and nothing about increased congestion, noise and pollution, except surprisingly in the Ash/Tongham area. One questions why this should be the case.</p>	Additional detail was available in the main SA Report (section 4.6).
<p>On landscape, it is accepted that the allocations are "likely to have inevitable effects on landscape and townscape character locally" by which we would assume adverse</p>	The transport policy itself may result in positive effects on landscape/townscape, recognising that the baseline situation is one whereby there is development / growth

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<p>effects. It then goes on to state that the plan will also have positive effects “through a range of provisions relating to the fabric and setting of cultural heritage assets” and that transport “has the potential to have indirect positive effects on landscape and townscape quality”. This seems an amazing statement to make unless this refers to a plan for sending traffic through a tunnel or underpasses so that pollution is reduced and quality of life improved as a result. There is no attempt made to balance the harm with these relatively insignificant benefits, although it is stated that “the overall effect of these policies needs to be weighed against the likely effects of new development proposals in the Borough”.</p>	<p>in car travel without the policy. However, we accept that this matter must be explained more carefully (if, indeed, the SA Report wishes to make this point at all).</p>
<p>On climate, there is a reference to mitigation, but nothing about the overall adverse impact of the plan.</p>	<p>We maintain that the effect of the plan will likely be to support a reduction in per capita CO₂ emissions. This is the key metric (as opposed to CO₂ emissions from residents in Guildford), which should have been explained more clearly.</p>
<p>The Section on Site Appraisal housing concludes that there has been particular focus on the 5 largest sites, and that each has been through the site sustainability appraisal process. We cannot accept this claim as, for example, in the case of Wisley airfield, where the site is clearly not sustainably acceptable on many grounds, and it was only brought forward for inclusion at a late stage for plan consideration. One surely has to consider a range of factors in this case including existing traffic congestion on the A3 and at Junction 10 of the A3/ M25 interchange, the inadequacy of the A3 Ripley/ Wisley roundabout, the limited public transport services, the distance from the town and health facilities, and the absence of secondary school provision.</p>	<p>These are all valid points, and will be reflected in the SA Report (i.e. as part of the appraisal of spatial strategy alternatives, and as part of the draft plan appraisal, as appropriate).</p>
<p>To conclude, the Sustainability Appraisal is very weak and somewhat superficial. Little account seems to have been taken of, for example, existing road congestion, the need to increase road capacity, the impact on the countryside and the Green Belt, the effects on biodiversity, climate change, health provision and a host of other factors which appear to have been overlooked.</p>	<p>All of these issues are reflected in the SA framework.</p>
<p>Many of the points raised are outside the powers of the local authority. To most people, the scale of development is hopelessly unsustainable except in terms of increasing housing numbers and jobs.</p>	<p>The SA Report seeks to highlight the pros and cons of the draft plan, and alternatives, with a view to engaging local people and informing their consultation responses.</p>
<p>Sustainability appraisal and HRA were not published until August 6 despite consultation starting July 1</p>	<p>The 2014 Interim SA Report was available for the final six weeks of the consultation only. The Council accepts that this was a non-ideal situation, but would also point out that the 2014 Interim SA Report was produced voluntarily (i.e. was not produced in order to comply with any regulations or guidance). The only requirement is that the SA Report is published alongside the Proposed Submission version of the plan (under ‘Regulation 19’).</p>
<p>The SA does not give enough detail regarding environmental, biodiversity and</p>	<p>The SA scope (i.e. the issues that should and should not be a focus of appraisal,</p>

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landscape considerations	recognising a need to focus on strategic matters only and ensure conciseness) has been agreed through consultation with the statutory consultees (i.e. Natural England, the Environment Agency and Historic England).
<ul style="list-style-type: none"> • The SA has taken points in isolation instead of considering the impact as a whole. • At the start of the DLP consultation, the questionnaire asked whether people agreed with a non-existent SA. 	It is true that the role of SA is to consider the effects of the effects of the plan, and alternatives, in terms of each element of 'the SA framework' in isolation. The aim is to enable more informed consideration of which option (out of a set of alternatives) is best (or 'most sustainable') and how good / 'sustainable' the draft plan is.
The Sustainability Appraisal uses data from the 2007 SHLAA that fails to address changes in the purpose identified for the land or an expansion of the land identified for the purpose in the current draft.	Appraisal of site options in isolation is a relatively minor step in the SA process, with appraisal of spatial strategy alternatives being a more important step (i.e. a step taken in order to discharge the legal requirement to appraise 'reasonable alternatives'). As such, a proportionate approach was taken to the appraisal of site options that involved applying strict quantitative 'GIS' (i.e. distance/overlap) criteria only (i.e. no qualitative criteria were applied). There was, therefore, little potential to take account of site specific development proposals.
The SA came after the DLP was written so either the draft Local Plan is inconsistent with the SA or the SA has been written to fit in with the draft Local Plan aspirations rather than to influence them	SA work undertaken in 2013 was available to inform finalisation of the draft plan in 2014. The aim of publishing the Interim SA Report in 2014 was to inform consultation and subsequent plan finalisation.
<p>The sustainability indicators ignore:</p> <ul style="list-style-type: none"> • Irreplaceable assets • distinctive character • the countryside 	<ul style="list-style-type: none"> • The SA framework includes references to irreplaceable assets, e.g. ancient woodlands. • One of the 15 SA objectives is to: "Conserve and enhance landscape character" • The SA framework includes a reference to 'the countryside' and more generally landscape.
<p>The SA does not take into account:</p> <ul style="list-style-type: none"> • Traffic congestion • Climate • Health • Cost • Impact on Green Belt • School provision 	<p>A sustainability objective is to: "Achieve a pattern of development which minimises journey lengths and encourages the use of sustainable forms of transport (walking, cycling, bus and rail)". Furthermore, one of the three 'issues' listed under this objective relates to the traffic congestion.</p> <p>Climate: there is a dedicated SA objective</p> <p>Health: there is a dedicated SA objective</p> <p>Cost: this is not an SA issue.</p> <p>Impact on the Green Belt: Loss of Green Belt is not in itself a sustainability consideration, although clearly there are 'landscape' implications (and wider implications) that can be considered under a number of SA topic headings.</p> <p>School provision: there is adequate opportunity to consider this matter, e.g. under the objective heading: "3. Create and sustain vibrant communities"</p> <p>The HRA notes that the SANG locations and their deliverability remain uncertain. Plainly, further appropriate assessment work is required to determine whether the draft Plan "would" adversely affect the integrity of the SPA.</p>

Issue	Guildford Borough Council Response
	<p>The screening for draft Site Allocation 116 is factually incorrect in that it refers to an available SANG capacity of 55.5ha of land rather than 39 ha. The HRA cannot therefore be relied upon to show that the mitigation proposed is acceptable. Whilst comment is made that this draft allocation will provide potential mitigation for development, in particular draft Site Allocation 66, no mention is made of the fact that draft Site Allocation 116 lies wholly within 70m to 400m of the SPA, is crossed by a number of public footpaths connecting the land to the SPA, and has no physical barriers to prevent access to the SPA. The suitability for the stated purposes has not been properly screened, nor has the site's capacity to support any level of housing development.</p> <p>In relation to Draft policy 9, we agree with the suggestion to include a statement precluding development that would have detrimental effects on the environment, including the Thames Basin Heaths.</p> <p>As a matter of law any decision in plan making must be based on a full and robust understanding of the impacts, and the precautionary principle should be applied where there is uncertainty as to the likely effects of the proposed policy the European designated SPA. We conclude that the screening of the draft policies (2 and 9) and draft allocation sites at this stage of the plan making process is inadequate.</p>
<p>The summary only makes a comment on affordability in relation to housing growth, but gives no comment on possible adverse impacts</p>	<p>The discussion of the 'affordability' effects of the draft plan's housing strategy, on page 13 of the Interim SA Report Non-technical Summary, is presented under the 'Housing' SA topic heading. The appropriate place to discuss adverse effects of the draft plan's housing strategy is under other topic headings (e.g. 'Cultural heritage and landscape')</p>
<p>In the summary on transport, the comment is that the proposals should help to provide better interconnectivity, and nothing about increased congestion, noise and pollution.</p>	<p>Additional detail was available in the main SA Report (section 4.6).</p>
<p>In the summary on transport it states that it "has the potential to have indirect positive effects on landscape and townscape quality" - disagree</p>	<p>The transport policy itself may result in positive effects on landscape/townscape, recognising that the baseline situation is one whereby there is development / growth in car travel without the policy.</p>
<p>In the summary on climate, there is a reference to mitigation, but nothing about the overall adverse impact of the plan.</p>	<p>We maintain that the effect of the plan will likely be to support a reduction in per capita CO₂ emissions. This is the key metric (as opposed to CO₂ emissions from residents in Guildford), which should have been explained more clearly.</p>
<p>Little account seems to have been taken of, for example, existing road congestion, the need to increase road capacity, the impact on the countryside and the Green</p>	<p>All of these issues are reflected in the SA framework.</p>

Issue	Guildford Borough Council Response
Belt, the effects on biodiversity, climate change, health provision and a host of other factors which appear to have been overlooked.	
Many of the points raised are outside the powers of the local authority. To most people, the scale of development is hopelessly unsustainable except in terms of increasing housing numbers and jobs.	The SA Report seeks to highlight the pros and cons of the draft plan, and alternatives, with a view to engaging local people and informing their consultation responses.
No building should take place if we are to protect habitats	<p>The Local Plan will direct development to sustainable locations. Considerations of sustainability will include choosing locations where the impact on habitats is reduced or can be mitigated.</p> <p>The Local Plan must comply with national policy and would not be able to put a moratorium on all building.</p>
<p>Doesn't justify development on the Green Belt</p> <p>Removal of land from green belt impacts habitats negatively</p> <p>Wisley Airfield has SS1 and europian legislation</p> <p>Wider implications on species and wildlife not considered through the HRA – Wisley & West Horsley</p>	<p>The HRA is a requirement of the Habitats Regulations. The regulations require the HRA to examine whether plans or proposals are likely to have a significant effect on European sites of nature conservation importance: Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar sites known as Natura 2000.</p> <p>The HRA is not required to consider impacts on Green Belt or other habitats.</p>
Doesn't consider infrastructure	The HRA looks at proposals in the plan as a whole, including infrastructure.
The HRA does not consider the impact of worsening air quality from increased traffic on the A3 because the A3 is not part of the local road network. This is not robust.	The consultant producing the updated HRA for the Proposed Submission Local Plan has been asked to consider this point.
HRA adds no support to the site selection process and defers it all to the planning application stage which is too late.	Our spatial strategy and site selection have been informed by the Sustainability Appraisal process.
URS's analysis of individual site allocations is bland and unhelpful inasmuch as all development is given broadly similar comment – this might cause harm to the SPA if not mitigated	The URS (now AECOM) team that produced the HRA are experts in the field. The Council is confident that the approach taken is correct.
The HRA doesn't address the SAC Development proposals will effect SPA, Thursley Ash Pirbright & Chobham SAC	The HRA does address likely potential impacts on the Thursley, Ash, Pirbright and Chobham SAC.
<p>Concerns over the input from Natural England on air pollution</p> <p>Concerns over monitoring of existing air pollution</p> <p>Analysis of air quality problems is based on an assumption</p> <p>Wisley is an SNCI and sits within the SPA boundary – could contribute to reduced air quality</p> <p>The scale of development for housing and employment purposes would tend to increase road journeys and would have an adverse pollution Impact. No reference to such impact or potential restrictions as part of the Infrastructure Baseline report - not clear what impact this concern may have on policies.</p>	The HRA has been redrafted for the Proposed Submission Local Plan: strategy and sites. The revised HRA has payed particular attention to the comments from Natural England regarding air pollution

Issue	Guildford Borough Council Response
<p>SANG info is factually incorrect Sites 116,112, 110 The SANG calculations are wrong</p>	<p>Site 110 (Broadstreet and Backside Common) is no longer considered as potential SANG in the Proposed Submission Local Plan: strategy and sites. Site 112 (Russell Place Farm) is listed as 82 hectares in the draft Local Plan Strategy and Sites 2014 but is actually 33 hectares. The HRA had the correct figure. Site 116 (Former Wisley Airfield SANG) is identified in the HRA as being in the 400m to 5km SPA zone rather than the 400m zone, and having a capacity of 55.5 hectares rather than 38. This has been corrected in the updated HRA.</p>
<p>No evaluation of how SANGS can be 'suitable alternatives' No indication as to whether the SPA is working in its objective to protect species</p>	<p>The SANG approach to mitigating impacts on the SPA has been established by the Joint Strategic Partnership Board. It's effectiveness is monitored by Natural England, which is a statutory body. The HRA is not required to evaluate this approach.</p>
<p>Too much SANG is simply a mechanism for funding management of existing green areas or for putting car parks in the countryside SANGs do not mitigate as they are already there so contribute nothing that doesn't already exist.</p>	<p>The Proposed-Submission Local Plan Strategy and Sites favours provision of new open space for SANG over the use of existing open spaces. All the proposed new SANGs would provide new public open space. SANGs should include parking areas in order to function as a suitable alternative to the SPA, and the Council supports improvements in access to the countryside in line with the NPPF, including providing appropriate parking options.</p>
<p>The Thames Basin Heaths SPA Avoidance Strategy needs revising</p>	<p>The strategy is likely to be reviewed in 2016. One of the roles of the strategy is to set out how development will be mitigated over the next plan period. As such, work on this needs to be done alongside work on the new Local Plan.</p>
<p>Further assessment work is required to determine whether the draft LP "would" adversely affect the integrity of the SPA.</p>	<p>The role of the HRA is to determine whether the Local Plan Strategy and Sites would have an impact on the SPA. The HRA has been updated for the Proposed Submission Local Plan: strategy and sites and will be tested at examination.</p>
<p>Doesn't support the level of growth set out in the plan.</p>	<p>The HRA considers the effects of the development proposals in the plan on the specific international habitats and concludes that impacts can be mitigated.</p>
<p>Consultation process on the HRA is invalid</p>	<p>The Council was not required by law to consult on the HRA when it consulted on the draft Local Plan Strategy and Sites (the regulation 18 stage). However, the Council did consult on the HRA for six weeks, which would be considered a standard consultation period.</p>
<p>Plan needs a policy on SANG and biodiversity. Plan needs a TBH SPA policy - should be its own stand-alone policy</p>	<p>The Proposed Submission Local Plan: strategy and sites includes a new policy on the SPA and SANG and an enhanced policy on biodiversity.</p>
<p>SPA has not been strategized in the Draft Plan and yet it is a fundamental constraint on development beyond the legitimate controls of the Council. SPA needs to be amplified as a constraint</p>	<p>The SPA has been treated as an absolute constraint in the local plan. No development sites within the SPA are promoted, and residential development within the 400m zone has been constrained. The Proposed Submission Local Plan: strategy and sites contains a strategic SPA policy and is also addressed by the strategic policy on biodiversity. The plan is accompanied by the SPA Avoidance Strategy which will be updated in due course.</p>
<p>Green Belt developments and village insetting could have a detrimental effect on the SPAs – increased road journey and emissions</p>	<p>The HRA considers the impacts on air quality from increased traffic. The potential sites in the Proposed Submission Local Plan: strategy and sites have been subject to traffic modelling, which has informed the HRA.</p>

Issue	Guildford Borough Council Response
Removal of Flexford/Normandy from the Greenbelt for the purpose of "safeguarding the land" will result in degradation of important Grade 3A agricultural land	This comment has been responded to in Planning for Sites
The screening of the draft policies (2 and 9) and draft allocation sites at this stage of the plan making process is inadequate	These policies have been revised. The HRA for the Proposed Submission Local Plan: strategy and sites will screen these policies. The HRA will be tested at examination.
SANG contributions as a part of development levies will inevitably make Affordable Housing less viable as a part of new development and there is a considerable risk that the Local Plan targets will not be met.	It is agreed that funding SANG through development will affect viability and impact on the delivery of affordable housing. However, as they are a form of infrastructure this is the most appropriate funding mechanism. There does not appear to be another obvious funding mechanism available that could deliver the quantum of SANG needed to deliver the plan.
The HRA report takes little or no account of development beyond the borough boundaries	The HRA is required to consider the impacts of plans and projects both alone and in combination with other plans and projects. The Council disagrees that it has not done this.
Some form of spatial impact assessment should be conducted to enable us to understand the effect on the borough's supply of development sites	This has been considered as part of the Sustainability Appraisal process.
Does the HRA comply with Strategic Environmental Assessment Regulations?	The HRA has been undertaken by experts in the field. The Council is confident that it complies with the relevant legislation.

12. Comments on Question 4: The vision

Issue	Guildford Borough Council Response
<p>Support but/as:</p> <ul style="list-style-type: none"> • Progressive objectives are well defined. Vision whilst futuristic is sensibly and sensitively balanced relative to increasing population demands • Juggling the needs of all groups, ages, needs & financial backgrounds is not going to be easy • It is important to tackle traveller integration head on • Believe the aspirations are reasonable and achievable • The vision for Guildford state the need for key aspects that would facilitate residential development. We support the principles outlined within the plan. 	Comments noted
Vision is good. But you always fall down re "infrastructure"- & small businesses outside of towns closing	The local plan seeks to meet our objectively assessed needs for all types of development whilst protecting the natural, built and historic environment. The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure to support the planned development which is expected to place extra pressure on existing infrastructure, or to need new or improved infrastructure. The IDP will be updated as further detail on supporting infrastructure is available. Developer contributions and other funding sources will be used to ensure that key infrastructure is delivered when it is needed, including at the

Issue	Guildford Borough Council Response
	<p>planning application stage.</p> <p>The success of individual small businesses is beyond the scope of the Local Plan.</p>
<p>Could be more ambitious, cleanest, greenest, most high tech, superfast broadband in the country and so on In an ideal world yes, In reality will be hard to implement</p>	<p>We have reviewed our vision and objectives and consider that our objectives are aspirational but realistic.</p>
<p>Must be a positive strategy that plans appropriately for identified need</p>	<p>We have added a new objective that seeks to deliver sufficient sustainable development to meet needs.</p>
<p>The vision for Guildford identifies a variety of locations within the Borough where residential development could be located. We believe the vision includes: business growth that supports a thriving economy respects the character of the Horsley area provides much need new homes/respects the character of the Shalford area/site 78 White Lane, Ash We support the principles in connection with the Benswood SANG, Horsley (Site Allocation 107)</p>	<p>Comment noted</p>
<p>If infrastructure improvements are not given priority infrastructure they could get let out and forgotten due to budget cuts caused by another recession</p>	<p>Developments will normally be subject to planning conditions or obligations which require infrastructure to be provided at certain times.</p>
<p>Relies on mechanisms such as CIL to fund infrastructure once development has started however may never come to fruition.</p>	<p>We are planning to introduce the CIL</p>
<p>The rest of the plan does not match with the vision, only focuses on housing development. Development should be contingent on being able to implement the infrastructure</p>	<p>The local plan seeks to meet our objectively assessed needs for all types of development whilst protecting the natural, built and historic environment. The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure to support the planned development which is expected to place extra pressure on existing infrastructure, or to need new or improved infrastructure. The IDP will be updated as further detail on supporting infrastructure is available. Developer contributions and other funding sources will be used to ensure that key infrastructure is delivered when it is needed, including at the planning application stage.</p>
<p>Yes but insufficient focus on providing new business premises, encourage high-tech start-ups,</p>	<p>This has been addressed through the revised policies. Revised policy E1: Sustainable employment states: "We will:</p> <ul style="list-style-type: none"> • <i>support the retention, creation and development of small local business by encouraging a range of types and sizes of new premises including incubator units, managed workspace and serviced office accommodation"</i> <p>New policy E2: Location for new employment floorspace states: "Proposals for the development of new B class uses will be encouraged and provision for small business units (less than 50sq m), suitable for start-ups and</p>

Issue	Guildford Borough Council Response
	<p><i>SME will be encouraged</i>".</p> <p>New policy E4: Surrey Research park states:</p> <p><i>"It is expected that the new extension will provide a variety of sizes of unit including some small units (between 15 – 80 sq m) in order to meet the needs of start-up companies"</i>.</p>
<p>Economic development of villages is important and that can be achieved by removal of strategic land from the greenbelt around current settlements.</p>	<p>Comment noted. Where land is available and suitable we seek to locate a mix of employment and residential in the villages.</p>
<p>Council must ensure that it gets the best use out of development sites. Council should decide what is needed and not the developers who just want to make a profit</p>	<p>The Local Plan identifies the use and quantum of development that we consider appropriate for each site. Any planning applications will be judged in accordance with the site allocation and other relevant policies.</p>
<p>Must be a positive strategy that plans for identified need, The overall vision for the borough needs to be more exciting</p>	<p>We have revised the vision in the Proposed Submission Local Plan.</p>
<p>Vision and Ambitions</p> <ul style="list-style-type: none"> • Vision should recognise the important of maintain the wildlife and environment. "Ensure the environment and green space is maintained and enhanced for the future." • The vision should be viewed holistically - no one component to be afforded any greater or overriding weight. • Vision should recognise ties with London, and that ensuring ready access to London will provide cultural and economic prosperity • Protecting and enhancing the environmental, historic and cultural assets of the Borough should be made explicit as a fundamental part of the vision. • Specifically outline an ambition to meet the 'objectively assessed needs of the Borough' • Seems like vision is to create a mini London or a city like Reading • Make environmental protection explicit in the vision such things as a green space network, enhancing natural landscapes, protecting historic heritage, improving built and natural environment, promoting biodiversity, and enhancing the character and separate identity of towns and villages. 	<p>Comments noted and where relevant addressed in the revised vision in the Proposed Submission Local Plan.</p> <p>The role of London and the wider region is addressed through our evidence base, notably the SHMA, whereas the vision relates to how Guildford will change as a result of the plan.</p> <p>The revised vision in the Proposed Submission Local Plan is more specific to Guildford borough as a place.</p>

Issue	Guildford Borough Council Response
<p>Too ambitious/not suitable long term:</p> <ul style="list-style-type: none"> • Too vaguely aspirational /too vague to form a judgement and creates aspirations that can never be met. • There is a lack for affordable homes and Guildford in an expensive area to live and work in. The jobs you propose to create would not pay enough for people to buy in the area - your vision is too ambitious • Your vision is not suitable in the long term. Lacks a suitable vision for the future 	<p>We have reviewed our vision and objectives and consider that our objectives are aspirational but realistic.</p>
<p>Housing:</p> <ul style="list-style-type: none"> • Existing Guildford community don't wants 1000's of new homes/625 homes a year • Growth too high • The vision seems mainly intent on inflicting communities with unwanted housing developments throughout the borough • Housing number is too high. It is unsupported by sound data or data analysis and is unrealistic for a borough with the landscape and infrastructure constraints of Guildford • The proposed achievements will only be achieved to the detriment of main rural areas. The problem will not be resolved by 'hiveing off' no's into villages which are unable to sustain such large no's. Minor increases can be absorbed 	<p>These comments have been responded to in Policy 2</p>
<p>We do not consider enough housing provision is being made in sustainable locations that will not have a negative impact on its surroundings</p>	<p>We have considered alternative reasonable spatial strategy and site options through the Sustainability Appraisal process.</p>
<p>Not all development needs for houses can be met by brownfield so other areas needed & chosen on good basis</p>	<p>Comment noted</p>
<p>Provides a choice of homes to meet the identified needs which supports the economic growth and much needed housing.</p>	<p>Comment noted</p>
<p>The need to ensure there is adequate provision in Guildford of housing for all social classes and age groups</p>	<p>This is addressed in the revised vision in the Proposed Submission Local Plan.</p>
<p>Better facilities for the elderly - housing suggested largely geared towards executive family homes and flats for younger people,</p>	<p>This is addressed in the revised vision in the Proposed Submission Local Plan.</p>
<p>Affordable accommodation for vulnerable & homeless</p>	<p>This is addressed in the revised vision in the Proposed Submission Local Plan.</p>
<p>Focus more on the amount of housing, achieving the Objectively Assessed Housing Needs.</p>	<p>This is addressed in the revised vision in the Proposed Submission Local Plan.</p>
<p>Emphasis must be on affordable, renting housing not millionaire mansions in the nice bits of the borough.</p>	<p>This is addressed in the revised vision in the Proposed Submission Local Plan.</p>
<p>Limit amount of Buy to Let properties</p>	<p>The Buy to Let legislation is set by central government, not locally.</p>
<p>Build new villages from scratch instead of insetting current ones</p>	<p>The requirement for insetting has been covered in Policy 9</p>

Issue	Guildford Borough Council Response
Employment/Economy	
Vision should specify the kind of industry we want to attract	This is addressed in the revised vision in the Proposed Submission Local Plan.
Guildford is an expensive area and the jobs you are providing will still not allow people to buy	The NPPF requires that we align our housing and economic strategies to ensure that we do not deliver unsustainable development. The SHMA includes an uplift in housing number to address issues with affordability.
Doesn't increase work opportunities in the locality	The level of new employment floorspace has been calculated from the need generated by the anticipated growth in jobs. The need has been assessed by consultants AECOM who produced the Employment Land Needs Assessment (ELNA), published in Sept 2015. The mean average of three economic forecasts of the number of employees in the borough. AECOM then translated this into the need for floorspace using historic trends.
The opportunity to capitalise on the opportunity to create a dynamic, knowledge based economic hub capable of creating jobs for future generations and significantly enhance GVA.	Comment noted
Supports economic growth in sustainable and accessible locations.	Comment noted
Support the expansion of the economic vitality of our rural areas.	This is addressed in the revised vision in the Proposed Submission Local Plan.
Jobs, growth and services should wherever possible be grouped together.	This is addressed in the revised vision in the Proposed Submission Local Plan.
The CLLR will support the continued economic growth of Guildford - strategic priority of the CLLR can be strengthened through revised wording	<p>The Clay Lane Link Road scheme is considered not to be a key infrastructure requirement on which the delivery of the 'Proposed Submission Local Plan: strategy and sites' depends.</p> <p>Nevertheless, the Clay Lane Link Road is an 'aspirational' scheme in the Council's Guildford Borough Transport Strategy (April 2016). An 'aspirational' status has been defined as 'A strong business case will need to be demonstrated in order to secure funding as the estimated cost presently exceeds typical funding envelopes and/or there are significant planning and statutory approvals to be achieved.'</p> <p>Future proposals for the Clay Lane Link Road scheme will need to be progressed as part of a planning application and be assessed according to its merits.</p>
Too much focus on business growth	The level of new employment floorspace has been calculated from the need generated by the anticipated growth in jobs. The need has been assessed by consultants AECOM who produced the Employment Land Needs Assessment (ELNA), published in Sept 2015. The mean average of three economic forecasts of the number of employees in the borough. AECOM then translated this into the need for floorspace using historic trends.

Issue	Guildford Borough Council Response
<p>Enhancing Guildford's existing local centres, district centres and in particular, the town centre. These central areas contribute significantly to the success of the borough</p>	<p>This is addressed in the revised vision in the Proposed Submission Local Plan.</p>
<p>Retail: Town centre retail expansion should be lower than in DLP put more shops in the Suburbs Light industry and retail does not seem like it will foster world-class business of a dynamic economy.</p>	<p>The Retail and Leisure Update Study 2014 calculates future need /demand for additional retail floorspace over the plan period assuming that Guildford town centre's retail share remains constant. We are proposing a hierarchy of retail and service centres to serve the whole borough, with many local centres in Guildford town, outside of the town centre. Employees of world class businesses need to do their shopping somewhere. Supporting services are also needed, not just high value economic uses. Other uses are needed for a balanced economy.</p>

Draft

Issue	Guildford Borough Council Response
<p>Infrastructure</p> <ul style="list-style-type: none"> • insufficient understanding of day to day living in the area; infrastructure issues inadequate • I would prefer Guildford Town Centre to be less congested. Infrastructure will become overwhelmed. if any proposed GP surgeons, schools etc are not built it will put too much strain on existing resources • As the roads, welfare and schools are not managed correctly at the moment we can't be sure these will be managed correctly in the future and enough resources put in place • the infrastructure issues are not adequately addressed, particularly traffic/road matters • catastrophic effect on the infrastructure of the Borough and is totally unsustainable • congestion isn't being addressed esp A3 access so it seems Guildford will be further gridlocked for longer periods • put more emphasis on public transport • Would be good to develop train lines to the Suburbs (Merrow/Burpham) • The vision is one of growth with no regard to connect communities or sustainability. No view of the faulty infrastructure/ traffic etc • If "Themes—" is part of this question then much of this material is doubtful. For example, while there may be peak hour overcrowding on train [infrastructure]. This is not within the competence of the Guildford Local Plan, but is a regional or national issue in the hand of DoT • The impact of long term under-investment in infrastructure in Guildford; the proposed infrastructure improvements show little insight of current issues or vision on how these might be addressed • Hindhead Tunnel style bypass for town centre • Radical realistic approach of siting schools near park and ride facilities • Need long term flood defences - More thought should be paid to sites that flood • Housing, schools and transport need to work together • Greater focus on buses and green transport • Considered plan on how to improve road infrastructure/ congestion /transport to increase sustainability • Need Road/Traffic studies • Evidence/ backing from Railtrack/SWT/Highways Agency • How will the necessary infrastructure projects be provided – cost of providing requisite infrastructure will be enormous • The University's development whether on its campus or at Blackwell Farm will ensure that supporting infrastructure needs are included. The University has a strong track record in providing infrastructure to support its activities, including funding for improvements on the local road network junction improvements and for sustainable movement (cycle ways and bus services). 	<p>The Infrastructure Delivery Plan (IDP) and the Local Plan infrastructure schedule set out the key infrastructure to support the planned development which is expected to place extra pressure on existing infrastructure, or to need new or improved infrastructure. The IDP will be updated as further detail on supporting infrastructure is available. Developer contributions and other funding sources will be used to ensure that key infrastructure is delivered when it is needed, including at the planning application stage.</p> <p>The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'. Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Transport Strategy and IDP may therefore be updated to include these. As planning applications are considered for the sites identified in the new Local Plan, additional transport schemes to address site access and other localised issues may be secured.</p>

Issue	Guildford Borough Council Response
<p>Development</p> <ul style="list-style-type: none"> • There is too much development and not enough thought about the current population- population pressure needs to be addressed • Balance is not even. Puts developers first & not the existing population. • Smaller areas of development over wider area/ Expand villages • Development would ruin the countryside character of much of the borough. Proposals seek to urbanize many villages. Ruin the historic heritage • I think the vision depicts a bleak future: with scarcer facilities, more built-up areas, consequent social degradation, and greater traffic congestion. In short: it is likely be a worse place to live and work in • The vision seems mainly intent on inflicting communities with unwanted housing and industrial developments throughout the borough • Opposed to high-rise development, which thankfully has been muted in Guildford to date. Towering 'Woking Town high-rise development' is patently not suitable for Guildford • The resultant need for regeneration within the Town Centre • The opportunity to improve Guildford as a visitor destination • The opportunity to make better use of Guildford's riverside • Maintain character and minimize impact on town • Require new developments to contribute towards making environmentally sustainable places. • Proper independent and unbiased needs and impact assessments for each new development proposed • Additional land supply/site allocations • In the past developers have refused to build quoted affordable houses after contract has been awarded and other houses built 	<p>These comments have been responded to in Policy 2</p>
<p>University:</p> <ul style="list-style-type: none"> • Policies to reflect the impact of the University - now being approximately 9% of the population - 1532 houses occupied by students and staff • Clear strategy for the University campuses • Clear analysis showing what capacity exists for development on the two campuses 	<p>Policy H1 Homes for all provides a clear approach towards student accommodation where we expect 60% of UNiS eligible students to have bedspaces on campus. Policy H1 Homes for all provides a clear approach towards student accommodation The University continue to implement outline planning permission for the Manor Park campus, and there are currently 2 pending planning applications for student accommodation at Manor Park.</p>

Issue	Guildford Borough Council Response
<p>Green Belt</p> <ul style="list-style-type: none"> • Overcrowded too much Green Belt destroyed • No building on Green Belt, protect it • Consideration needs to be given to wider settlement boundaries around those settlements being inset from the green belt. • Object to inseting 	<p>These comments have been responded to in Policy 9 and 10</p>
<p>Brownfield - Clear plans/ assessment to use Brownfield sites first</p>	<p>Comment noted.</p>
<p>Sustainability/environment</p> <ul style="list-style-type: none"> • Nobody wants this, the draft local plan is unsustainable • Guildford, a historic town, is surrounded by beautiful countryside, much of it protected by the Green Belt. The local plan opens the door for wholesale destruction. • Information on planning, design and standards for local outdoor space • Add an environment that is truly sustainable, with generous public green space 	<p>Sustainability of the plan has been considered as part of our Sustainability Appraisal process. Green belt issues have been responded to in the table for Policy 10 The Council is producing an Open Space Sports and Recreation study which will set out standards for provision of outdoor space. This will inform planning applications and support policy 14, which deals with open space.</p>
<p>Population:</p> <ul style="list-style-type: none"> • We cannot cope with any further impulse of people in the Surrey area • The issues we face are overcrowding and infrastructure problems. These should be addressed first before seeking to increase the local population further • Vulnerable communities should be included - Accessibility for all needs to be considered in all plans/ designs 	<p>These comments have been responded to in Policy 2</p> <p>The Proposed Submission Local Plan includes Policy H1: Homes for All which seeks to provide the types of homes needed by all sectors of our community.</p>
<p>NPPF</p> <ul style="list-style-type: none"> • A vision for the borough must be in conformity with NPPF in particular, with the need to secure sustainable development i.e. development which addresses the economic, environmental and social needs of the Borough – stronger emphasis needed on environmental and social concerns • We will become a feeder town for London, another London suburb. We will almost be part of Greater London, This is not in accordance with NPPF policy. 	<p>This is addressed in the revised vision in the Proposed Submission Local Plan.</p> <p>We need to recognise the role of London and the wider region and this is done through our evidence base, notably the SHMA, however the Local Plan primarily seeks to meet our own needs whilst seeking to safeguard the natural, built and historic environment of Guildford.</p>

Issue	Guildford Borough Council Response
<p>Structure/wording:</p> <ul style="list-style-type: none"> • There needs to be a clear set of strategic objectives, not merely generalised heading • Lack of appreciation of the main objectives. Eg. Research shows a preference for living in town or of town environment. Overkill in rural areas in order to meet these aims will destroy many areas • Produce a coherent policy and not piecemeal development as at present - faster plan is necessary • The plan is a patchwork of mostly housing developments; the vision is loose with no relation to Guildford 	<p>These issues are addressed in the revised objectives in the Proposed Submission Local Plan. The revised vision in the Proposed Submission Local Plan acknowledges the need to protect the existing distinctive character between the urban and rural parts of the borough.</p>
<p>Consultation:</p> <ul style="list-style-type: none"> • The local populations have not been adequately consulted or informed • Not heeding local residents views, not the vision of most Guildford people • Local views have been overlooked or ignored – need to be more inclusive • The option for the local electorate to veto the draft Local Plan through a referendum 	<p>The Local Plan has been prepared in accordance with the statutory requirements. This Consultation Statement sets out how we have taken people's views into account. The Local Plan is not a referendum. A planning inspector will assess whether our plan is sound. Namely that it is positively prepared, justified, effective and consistent with national policy.</p>
<p>Evidence base:</p> <ul style="list-style-type: none"> • Doubts over evidence base • Need accurate population figures • The plan should be flexible and performed in stages and then need reassessed after each stage • No sign of cooperation with mole valley district council 	<p>These comments have been responded to in the table for Appendix C: Evidence Base</p>

Issue	Guildford Borough Council Response
<p>General:</p> <ul style="list-style-type: none"> • It paints a picture of a very different environment to the one enjoyed today • The vision presents a strategy for unrestrained growth largely ignoring the social and environmental consequences • Our town will be ruined, vision for future communities is very bleak • Given that the vision itself is flawed, the strategy and plans are worthless • Issues have not been addressed adequately. • Vision is simply incorrect and inappropriate • The objectives are crazy and will destroy the area • This proposal won't meet the hopes and expectations of the communities in the future by the year 2031. The emphasis on growth within the plan is too great and will destroy Guildford and its surroundings, its historical importance and its importance as positioned in the Metropolitan Greenbelt. • If ambitions are the aims such as quoted in the Plan: "to grow a sustainable economy that will support all aspect of life in our borough". Then, I think such lofty ideals will not be achieved through the scale of developments proposed. More likely the Plan will end with getting quite the opposite outcomes of its ambition • The objectives are imprecise, not measurable and have no dates as to when they will be achieved. They should conform to the S.M.A.R.T. model to better enable progress tracking • Consideration of the impact on current resident's enjoyment of the community • Increase community based places • The vision articulated in the draft Local Plan is woeful and lacks any kind of ambition. It is a generic, any-town vision, is not aspirational • Suggest that the second bullet point in the box in the paragraph should be amended to read: <ul style="list-style-type: none"> ○ To be a place fostering world-class businesses and a centre for learning and research, development, design and innovation with capacity to expand and deliver growth in an evolving, vibrant and thriving economy 	<p>We have reviewed the vision and objectives of the Local Plan and consider that there is an adequate balance between social, environmental and economic factors. We also consider that our objectives are aspirational but realistic, as required by the NPPF.</p> <p>Comments noted.</p>
<p>Vision does succeed in depicting the Borough of 2031.</p>	<p>We need to recognise the role of London and the wider region and this is done through our evidence base, notably the SHMA, however the Local Plan primarily seeks to meet our own needs whilst seeking to safeguard the natural, built and historic environment of Guildford.</p>
<p>Keep Guildford a lovely little town, not a suburb of London</p>	<p>We have built in flexibility within our site allocations to ensure that we can still meet our housing requirement should sites not deliver as planned.</p>
<p>Work is required to ensure flexibility and deliverability</p>	<p>Existing non implemented consents for both loss and gain of employment</p>

Issue	Guildford Borough Council Response
	floorspace will be included in the calculations. Height restrictions in the green belt will be loved by both the NPPF or Local Plan Green Belt policy.
More detail in terms of the existing residue of non- implemented existing consents for residential, B1,B2 and B8 development including total amount of sq ft proposed and likely permitted plot ratios and height restrictions to minimise impact on Green Belt	We have considered this as part of discharging our legal duty to cooperate. Further information is included in our Duty to Cooperate topic paper.
Consideration of the impact on neighbouring districts/ boroughs	Comment noted.
The University considers it has a major role to play in assisting the achievement of this vision and ambition, both in its position as a centre of academic excellence and research and development and links with the Surrey Research Park, the Royal Surrey Hospitals Trust and the Pirbright Institute, and as the custodian and developer of a strategic development site delivering a high quality mixed use and inclusive community at Blackwell Farm.	Agricultural land quality is one of many factors considered through the Sustainability Appraisal process.
Maintain good agricultural land and ensure local food production	

13. Comment on Question 5: The Key Diagram

Issue	Guildford Borough Council Response
Yes	Comment noted.
No	Comment noted.
Key diagram is very good, clear, and easy to follow.	Comment noted.
Too small as to be illegible, hard to read A4 size, make bigger.	Comment noted, key diagram to be redrafted.
Can't located key diagram, give page number. Not in contents.	Comment noted.
Not enough detail in all areas: <ul style="list-style-type: none"> the drawing is simplistic and misleading Specific areas not identifiable Far too generic/general/schematic No clear strategy Unclear whether it is stages of preparing local plan or map showing changes to borough or Appendix E overview of borough map Not all sites represented, therefore lacks clarity on what is proposed and extension to Ash Green not highlighted. Confusing for members of public viewing to establish what is proposed Does not show spatial strategy 	<p>The National Planning Policy Framework (paragraph 157) states that key diagrams should indicate broad locations for strategic development.</p> <p>The Key Diagram is an illustrative way to bring together the main components of the spatial strategy across the borough. Since the draft Local Plan 2014, this has been significantly redrafted and redesigned to show the proposed key changes for the borough and to address as many of the comments raised as possible.</p> <p>Specific site allocations are shown with more detail on individual site proformas within the 'Proposed Submission Local Plan: strategy and sites' document.</p>
It's too confusing, cluttered and complex to be useful. Too much detail. Disguises significant changes proposed. Too contentious. Redraft	The key diagram has been redrafted and redesigned to make it clearer and to show significant changes.

Issue	Guildford Borough Council Response
The document as a whole is missing a clear map providing an overview of the geographic location of all sites.	The Policies Map shows this.
<p>Scale and density:</p> <ul style="list-style-type: none"> • It gives locations but no indication of the scale of proposed developments so it is difficult to assess the likely impact on an area from the diagram. • Accommodation in borough will be increased by ¼ . • Show the existing number of homes/people by area and the planned developments (no. homes/people), together with a further map showing peak time traffic flows on main roads and the anticipated impact of all the developments and planned infrastructure changes to understand the total impact. • It does not demonstrate the magnitude of the impact should the incorrect housing figure of 652 pa be carried forward • Does not illustrate the density of certain developments 	<p>The purpose of the key diagram is to show broad locations for strategic development, not the scale, impact or density of development, number of homes or people or detailed information on infrastructure.</p> <p>Greater detail on specific allocated sites is shown on individual site proformas within the Local Plan.</p>
Yes, but disagree with the draft plan, cancel the whole plan	Comment noted.
<p>Show 'Strategic Employment Site' on the Key Diagram:</p> <ul style="list-style-type: none"> • (Ewbank's site is within Site 74) • Send Marsh Village Inset Map (Appendix G) • Policy 13, which lists the strategic employment sites 	The strategic employment sites are shown clearly on the revised key diagram .
<p>Show further sites on key diagram for clarity:</p> <ul style="list-style-type: none"> • Eg site 55 (Tongham Triangle) which involves an extension to the urban area • Site north of Guildford for P & R • Additionally, small extensions to the urban area of Ash Green are proposed, but not highlighted. • Show as 2 key diagrams • This could be confusing for members of the public viewing the Key Diagram in order to establish where development is proposed. 	The revised key diagram shows the broad strategic development and employment sites and locations, alongside new railway stations and new park and ride sites. Detailed maps of sites are provided as Appendix to the Local Plan. To provide two key diagrams would be confusing.
<p>Amendments needed:</p> <ul style="list-style-type: none"> • A key • The key might be better ordered; for example 'A3' and this issue is being addressed. The Blackwater Valley appears as the only 'Countryside' in the Borough. • Rivers & canals could be labelled (and named) on the map. • error on the key for the Ash & Tongham map, red dashes and solid blue lines same the same description, the red dashes have the wrong description • suggest that (possibly by use of dashed border lines versus block lines) 	<p>A key/ legend has been included on this diagram; it has been revised and updated and addresses many of the comments raised in this section.</p> <p>Some of the requests for change (such as naming and numbering development, showing highway corridors etc) go beyond the scope of what a key diagram should show, and would add too many complicated details. We have sought a careful balance between providing information on strategic development but in a clear diagram.</p> <p>The order of the legend has been reviewed, and the A3 has been placed above</p>

Issue	Guildford Borough Council Response
<p>existing developments are differentiated from proposed ones (ie the park and rides exist, but the strategic sites do not)</p> <ul style="list-style-type: none"> • the dots used for the strategic sites / business sites do not give any indication of size and different size dots might help give a better perspective? • It does not however show progression of development. This could surely only be achieved through multiple maps over different time scales. • unclear why the proposed inset villages are given white circles, yet Ash Green is provided as a white area with a dotted line around its perimeter, perhaps suggesting a different designation although no indication of this is given within the key • Dots don't show extent of change proposed, white blobs for inset aren't clear • West Clandon – omitted an opportunity for settlement rounding • Key Diagram should be clear on those key strategies in infrastructure highway 'corridors' required to deliver the Local Plan to 2031 –identify "Corridor improvements to the A3 between Guildford and M25 Junction 10" • Sites not properly named in some cases, or development sites and employment sites are not named At least please number them with a key • Doesn't show safeguarded land • The accompanying text to policy 2 states that the safeguarded land for development is shown on the policies map but surely it should be shown on the Key Diagram if it is agreed • Show clearly local centres and major routes to outside the borough • why the proposed inset villages are given white circles, yet Ash Green is a white area with a dotted line, suggesting a different designation although no indication of this is given within the key • The FWA should be removed as a strategic development site. (Wisley Action Group) • It does not illustrate extent of the A3 corridor developments • why is the green strip to the west shown as countryside whereas the glossary states that countryside comprises the land outside the urban areas • The location of the shopping centres are shown in the key but are not clear on the diagram 	<p>other 'A' roads.</p> <p>Countryside has been added to the legend.</p> <p>A clearer base map has been used which denotes places across the borough including villages and the River Wey. Strategic development and employment sites have been shown on the diagram, although to label them would add too much clutter to the diagram.</p> <p>It is not the purpose of a key diagram to show the progression of development.</p> <p>Areas to be inset from the Green Belt are now more accurately depicted on the key diagram and shown in white.</p> <p>Comments related to the settlement boundary for West Clandon have been responded to in the table for Policy 9.</p> <p>The 'Proposed Submission Local Plan: strategy and sites' does not propose safeguarded land for future development.</p> <p>The motorway and A roads are depicted.</p> <p>Land at the former Wisley airfield remains as a strategic development site within the Local Plan and its therefore annotated on the key diagram.</p> <p>More detailed maps of sites are provided as Appendix to the Local Plan or as site allocations proformas.</p> <p>Shopping centres are now shown clearly.</p>
<p>Green Belt is crucial and it needs to stay and be reinforced.</p>	<p>Comments noted.</p>
<p>Include:</p> <ul style="list-style-type: none"> • AONB land not shown (nearly 50% of borough) • Thames Basin Heaths Special Protection Area (SPA), and both the 400m and 5km buffers around the SPA. 	<p>The revised key diagram shows:</p> <ul style="list-style-type: none"> • Area of Outstanding Natural Beauty (AONB) • Special Protection Area (SPA)

Issue	Guildford Borough Council Response
<ul style="list-style-type: none"> As a technical point, the location of the Suitable Alternative Natural Greenspace (SANGs) notation (green circle) is to the south-west of the Strategic Development Site notation (orange circle). To best reflect draft policies 66/116, and the emerging Masterplan proposals of WPI, the SANGs (or equivalent) notation should be located to the north. GBC should consider the identification and allocation of 'Green Infrastructure Areas', which may in part or full be utilised as SANGs. Amend the 'SANGs notation' on the Key Diagram related to Wisley New Settlement, to be located immediately to the north of the orange circle and further to amend the description of the notation to 'Green Infrastructure' Environmental plans/flood risk req or risk assessments for areas Should have wider A3 Safeguarded land Clearly mark SPA/SSSI/SANGs Show inset villages Traveller inseting not marked Employment sites not marked Site names 	<ul style="list-style-type: none"> Inset villages Traveller sites inset from the Green Belt <p>To keep the key diagram clear and succinct it has not been possible to include the following annotations;</p> <ul style="list-style-type: none"> 400m and 5km buffers around the SPA. Suitable Alternative Natural Greenspace (SANG) Green infrastructure areas Environmental plans Flood risk areas or risk assessments for areas Sites of Special Scientific Interest (SSSI) Site names <p>To show a wider A3 would be disproportionate in scale and dominate the key diagram.</p> <p>The Local Plan no longer proposes safeguarded land for future development.</p>
<p>Provides for otherwise redundant land.</p>	<p>Comments noted.</p>
<p>No to more houses, more roads and less countryside! I do not want this Plan to be accepted.</p>	<p>Comments noted.</p>
<p>The key diagram includes a new station and a park-and-ride facility at Blackwell Farm which are unlikely to materialise. Network Rail states that there has been no conversation with GBC or the University of Surrey in relation to a rail halt at this site. It is misleading to suggest these facilities when in fact they are purely hypothetical. Such suggestions could prejudice responses to the consultation.</p>	<p>The 'Enterprise M3 Strategic Economic Plan - 2014-2020' (Enterprise M3 Local Enterprise Partnership, March 2014) included a new rail halt at Park Barn. Network Rail is represented on the Enterprise M3 Local Enterprise Partnership's Transport Action Group.</p> <p>In addition, the Surrey Rail Strategy (see Surrey Rail Strategy Report, Arup, September 2013), undertaken on behalf of Surrey County Council, recommended that the business case for a new rail station at Park Barn should be prepared, to confirm the inclusion of the proposed Park Barn rail station in the recommended strategy. Network Rail was consulted as a stakeholder during the study process.</p>
<p>Key diagram fails as:</p> <ul style="list-style-type: none"> acting upon unrealistic forecasts encroaching on greenbelt without justification/unlawfully ignoring the views of the residents failing to protect Englands countryside does not show how development will affect individuals doesn't show social damage that extensive building/this plan will do 	<p>Comments noted, but tend to relate to the approach taken in the Local Plan rather than specifically to the key diagram. The purpose of the key diagram is to show broad locations for strategic development. Views of the residents have been taken on board where possible.</p>

Issue	Guildford Borough Council Response
Does not give any idea of what the impact will be - traffic, too many people, hospitals full, GP's full	The purpose of the key diagram is to show broad locations for strategic development and not the impact of development.
The key diagram shows the 16 villages proposed for removal from the Greenbelt It may provide a broad indication of how the borough will develop over the lifetime of the plan. No case has been made for inseting these villages as no exceptional circumstances has been evidenced to remove these villages from the greenbelt, would not only go against the concepts for which the metropolitan Greenbelt was established, but would serve to merge many of these villages, destroying their distinctive characters & against residents wishes.	Comments noted, but tend to relate to the approach taken in the Local Plan to inseting villages rather than specifically to the key diagram.
There are no references to the people who live in the borough.	The purpose of the key diagram is to show broad locations for strategic development and not reference people who live in the borough.
Historical sites e.g. Guildford castle We should conserve these sites and fit into the landscape.	Comments noted but the purpose of the key diagram is to focus on the broad locations for strategic development.
Full list of year on year reports that will ensure the infrastructure needed will be delivered.	This is not the purpose of a key diagram.
The Council should be considering far wider housing dispersal strategy, in conjunction with a higher housing requirement, focused on further extensions to the most sustainable settlements such as Ash and Tongham.	Comments noted, but relate to the approach taken in the Local Plan rather than specifically to the key diagram.
Represents Guildford Borough as an island - misrepresents the impact of proposals for development on the fringes of the borough and by neighbouring authorities. A map is required showing existing developed areas and the proposed developments covering all of Surrey and South London. It will demonstrate the increasing suburban sprawl of London absorbing Guildford communities.	The National Planning Policy Framework states that key diagrams should indicate broad locations for strategic development. It is not the purpose of a key diagram to annotate developments outside the borough.
Support new park and ride	Comments noted
Support GRA response	Comments noted

Q5b – The key diagram – anything missing?

Issue	Guildford Borough Council Response
Yes	Comments noted.
No	Comments noted.

Issue	Guildford Borough Council Response
<p>Location:</p> <ul style="list-style-type: none"> • Can't locate key diagram, give page number and list on contents page. • extremely hard to find for any who are using the Local Plan online • Explain what it is. • If GBC search engine is used, does not appear • For those using this document online you have to look at "Key facts about the borough" and scroll down .This document is not easily accessible. 	<p>Comments noted. An explanation of the key diagram is included in the introduction.</p>
<p>Make it larger</p>	<p>Comment noted. The key diagram has been revised for the 'Proposed Submission Local Plan: strategy and sites'</p>
<p>Carry A247 on through Send</p>	<p>Comment noted.</p>
<p>Difficult to communicate and understand the jargon.</p>	<p>The key diagram has been redrafted and is now considered to be easier to understand.</p>
<p>Diagrammatic key</p>	<p>The key diagram includes a diagrammatic legend (key).</p>
<p>The outline is adequate as guidance only. More details/proposals would no doubt will be available in due course. Redraft.</p>	<p>The key diagram has been redrafted.</p>
<p>Format</p> <ul style="list-style-type: none"> • Make the diagram larger, easier and clearer for all the community to understand. • More detail as to specific sites/infrastructure/locality/roads, have detailed inset maps. • Not easy to look at on computer and cant enlarge. Required to search for detail. • More than blobs for development • Separate pages • Different colour for inset development • PDF print came out upside down 	<p>The key diagram has been redrafted to make it easier and clearer to understand, with different symbols for sites. More detailed maps are provided elsewhere in the 'Proposed Submission Local Plan: strategy and sites' document – the key diagram is intended to provide an overview of the broad locations for development. To have the key diagram on separate pages would be confusing.</p> <p>Areas inset from the Green Belt are now shown in white. Comments noted.</p>
<p>Two parts/layers</p> <ul style="list-style-type: none"> • Add multiple layers to reference proposed changes. • Do in two parts – one for existing area and constraints, second for proposed policies. • Show topics in a series of diagrams. • identify capacity of different types of infrastructure and a third plan might provide this with traffic light coding to show where there is a reasonable amount of capacity (green), where the infrastructure is nearing 	<p>Comments noted.</p> <p>The National Planning Policy Framework (paragraph 157) states that key diagrams should indicate broad locations for strategic development. The revised key diagram has done this.</p> <p>Land-use designations are shown on the Proposed Submission Local Plan: strategy and sites Policies Map.</p>

Issue	Guildford Borough Council Response
<ul style="list-style-type: none"> capacity (yellow), and where it is already at or exceeding capacity (red). frame policies in specific areas that ensure there are adequate contributions or CIL allocations towards the creation of additional capacity. It would also go a long way towards explaining why some larger-scale developments would be desirable to deliver the required level of infrastructure, where piecemeal development on a small scale cannot further diagram should show all of the development sites allocated for development along with all proposed major infrastructure works. 	<p>It is considered important not to over complicate the key diagram which could make it confusing and appear cluttered; the focus is on showing strategic development sites.</p> <p>The site allocation policies list the specific requirements for each site and highlight the infrastructure requirements.</p> <p>Proposed site allocations are shown on more detailed maps that accompany the 'Proposed Submission Local Plan: strategy and sites'.</p>
<p>Sites:</p> <ul style="list-style-type: none"> Site 69 (Effingham) is 3 separate sites, not 1. The plans are opaque and disingenuous Send site 74 and Policy 13 – show on map as strategic employment site 	<p>Comments noted. The key diagram shows the strategic employment sites, and the proposals maps also now show these alongside locally significant employment sites.</p>
<p>Show:</p> <ul style="list-style-type: none"> site names street names local shops bus networks impact on rural roads new interchanges at A3 and A31 park and ride to north of Guildford productive farm land existing protected Green Belt new Green Belt show brownfield AONB, AGLV, SPA, SANGS Show AONB overlapping Blackwell Farm (inaccurate) inset villages and major sites Thames Basin Heaths SPA, the 400m buffer, and the 400m to 5km zone. commitment to improved land use rather than waste allocation of new housing sites near town centre infrastructure improvements – transport, sewerage, water road access for all schemes Guildford town centre strategic development site as an orange circle Dotted lines to outline different areas eg town centre, bellfields etc AGLVS that may become AONB land Bus interchange 	<p>The revised key diagram shows:</p> <ul style="list-style-type: none"> Green Belt Area of Outstanding Natural Beauty (AONB) Special Protection Area (SPA) Inset villages Traveller sites inset from the Green Belt Strategic sites <p>To keep the key diagram clear and succinct it has not been possible to include the following annotations;</p> <ul style="list-style-type: none"> 400m and 5km buffers around the SPA. Suitable Alternative Natural Greenspace (SANG) Green infrastructure areas Environmental plans Flood risk areas or risk assessments for areas Sites of Special Scientific Interest (SSSI) Site names Street names local shops bus networks impact on rural roads new interchanges at A3 and A31 brownfield land

Issue	Guildford Borough Council Response
<ul style="list-style-type: none"> Surrounding settlements Housing numbers of planned developments 	<ul style="list-style-type: none"> Areas of Great Landscape Value (AGLV) infrastructure improvements road access for all schemes Dotted lines to outline different areas AGLVS that may become AONB land Bus interchange Surrounding settlements Housing numbers of planned developments
<p>Unclear purpose</p> <ul style="list-style-type: none"> It is a completely unhelpful tool. Unclear whether it refers to the stages of preparing the local plan (p12 of the Local Plan document) or whether it refers to the map showing all changes to the borough in schematic and very unclear form Alternatively, it may seem to refer to Appendix E – the overview borough map 	<p>Comments noted.</p> <p>A new section has been inserted into the introduction chapter of the 'Proposed Submission Local Plan: strategy and sites' to explain the purpose of the key diagram. The key diagram has been significantly revised to make it clearer.</p>
<p>It should have a map that's shows the true impact if all plans go through inc Mole Valley</p>	<p>The National Planning Policy Framework states that key diagrams should indicate broad locations for strategic development. It is not the purpose of a key diagram to annotate developments outside the borough.</p>
<p>Separate physical diagram with the following featured: existing Metropolitan Green Belt. Check whether AONB is different in the key from the diagram and whether the SPA is sufficiently clearly indicated. The remaining information would then appear to be less cluttered and it should be possible to name the development and employment sites which could be highlighted in some way. Main proposals such as Wisley should be more prominent, or at least linked by number to the individual settlement maps in Appendix G.</p>	<p>The key diagram has been revised to be clearer and it includes:</p> <ul style="list-style-type: none"> Green Belt Area of Outstanding Natural Beauty (AONB) Special Protection Area (SPA) Strategic sites such as Wisley <p>To add numbers to the key diagram is considered to add clutter to the key diagram. More detailed maps accompany the Local Plan.</p>
<p>Criticisms</p> <ul style="list-style-type: none"> Visually confusing, over complex and does not clearly show the spatial strategy and lacks the important details It is sketchy and schematic in the extreme it is not representative of the key aspects of the draft Local Plan A vision for inappropriately aggressive economic growth arising only from physical buildings as development, overriding existing businesses, with disregard for the needs of existing residents, and for the environment, with extremely adverse consequences for all existing residents and also for existing businesses within the borough of Guildford check in particular whether the AONB is different in the key from the diagram and whether the SPA is sufficiently clearly indicated (or represented) 	<p>The Key Diagram is an illustrative way to bring together the main components of the spatial strategy across the borough. Since the Draft Local Plan: strategy and sites 2014, this has been significantly redrafted to show the proposed key changes for the borough. This includes the proposals for strategic development areas, strategic employment sites, new railway stations and park and ride sites and changes to the Green Belt and countryside boundaries. A clearer base map has also been used which denotes places across the borough including villages and the River Wey.</p> <p>Comments noted, but tend to relate to the approach taken in the Local Plan rather than specifically to the key diagram.</p> <p>The AONB and SPA is shown on the revised key diagram. It is considered that</p>

Issue	Guildford Borough Council Response
<ul style="list-style-type: none"> • Make less cluttered and name the development and employment sites 	<p>adding names to the development and employment sites would clutter the key diagram; Specific site allocations details are shown on individual site proformas within the 'Proposed Submission Local Plan: strategy and sites'.</p>
<p>Housing:</p> <ul style="list-style-type: none"> • Show the housing areas proposed, the housing numbers, the development in each area (eg 51% to east) and the resulting proximity of settlements. • The proposed developments in areas surrounding Guildford town should be clearer rather than indistinct markings. • Show existing and proposed densities. • Doesn't show the magnitude of the impact of 652 homes a year and impact of key sites. • A proposal for 13040 homes to be built over the next 15--16 years, a disproportionate amount both in the context of the land area of Guildford, and of the growth in the national population, driven by the desire of developers to sell executive homes in the South East of England • An intention that 70 per cent of the proposed new homes will be built on Green Belt, despite the fact that this is a county which is acknowledged to be beautiful, is one of the most highly wooded in England (although aggressive local use of woodland for biofuels seems to be altering the wooded character in some parts) and where Green Belt is highly cherished. Of the villages planned to be inset from the Green Belt, most have been highlighted (in various national cycle races) as picturesque English villages which should be prized as national treasures. • Almost all of the new building in the next five years is planned to be on Green Belt land, even though GBC owns substantial brownfield land in the town centre. This is the Council acting as a developer and landbanking our land against the interests of residents 	<p>The key diagram has been redrafted to make it easier and clearer to understand and provides an overview of the broad locations for strategic development which includes housing. More detailed maps are provided elsewhere in the document and individual site proformas show the numbers of housing. The proposed strategic sites are now shown as clear annotated areas. It is not the purpose of a key diagram to show densities.</p> <p>Comments noted however they do not appear to directly relate to the key diagram or its purpose.</p> <p>The Guildford borough urban area covers approximately 9% of the borough, with the Green Belt covering 89 % of our borough. 1.6 % of land taken from the Green Belt is allocated for development</p> <p>Brownfield land is at the top of our spatial hierarchy however there is insufficient land to meet our objectively assessed housing needs. Our spatial strategy is based on sustainability considerations. The amount of land needed for development that is currently Green Belt has been kept to a minimum, whilst ensuring we can meet our development needs over the plan period.</p>
<p>The diagram misrepresents the impact of proposals for development on the fringes of the borough by neighbouring authorities.</p>	<p>It is not the purpose of a key diagram to annotate developments outside the borough, although we have shown the Deepcut development.</p>
<p>It is also unclear as to why there are two types of SANG, one inset from the Green Belt. There does not appear to be any need to inset as SANG is not to be built on, therefore can be left within the Green Belt.</p>	<p>The key diagram no longer shows SANG.</p>

Issue	Guildford Borough Council Response
<p>In many sectors it is misleading. For example, why is the green strip to the west shown as countryside whereas the glossary states that countryside comprises the land outside the urban areas. The location of the shopping centres are shown in the key but are not clear on the diagram. The accompanying text to policy 2 states that the safeguarded land for development is shown on the policies map but surely 1t should be shown on the Key Diagram if it is agreed. Several sites, such as the development sites and employment sites are not named. At least please number them with a key.</p>	<p>The key diagram has been redrafted to make it easier and clearer to understand. Details of the employment sites are provided elsewhere in the Local Plan; to include names or numbers on the key diagram is considered to make it too cluttered.</p>
<p>No coherent plan/ policy – which a master plan would provide with benefits to both urban and rural areas</p>	<p>Comments noted. The previous ‘Draft Local Plan: strategy and sites’ 2014 has been revised and is now known as the ‘Proposed Submission Local Plan: strategy and sites’.</p>
<p>Support the GRA response</p>	<p>Comment noted.</p>
<p>Include developments outside borough impacting on traffic, infrastructure, housing need.</p>	<p>It is not the purpose of a key diagram to annotate developments outside the borough, although we have shown the Deepcut development.</p>
<p>Full details of who is responsible yearly for monitoring and delivery of sites</p>	<p>The Planning Policy Team is responsible for monitoring the delivery of sites. Findings will be published in a Monitoring Report.</p>
<p>Key funding figures and cost to local community</p>	<p>Comments noted.</p>
<p>Be honest about motives</p>	<p>Comments noted.</p>
<p>Wider public distribution</p>	<p>Comments noted. The Regulation 19 Local Plan is available online, at the Council Offices and at local libraries within the borough and also available to buy.</p>
<p>Include equal access for all</p>	<p>Comments noted.</p>
<p>Radical transport options</p>	<p>This matter is addressed under Policy I3 Sustainable transport for new developments.</p>
<p>Reconsider the proposed new Green Belt and area of separation in the Tongham area (draft Policy 11).</p>	<p>Addressed under Policy P3 Green Belt and the Countryside.</p>
<p>The key diagram does not give a view of the intended proposals for the borough over the duration of the plan. The impact of the drastic and damaging proposals needs to be reflected in the diagram so that it becomes part of a genuine consultation, and is not a selling document with the borough council acting as the partners or accomplices of the building and development lobby. Serious impact on the views into and out of the AONB and National Trust land, and so will have a serious impact on tourism and on the film sector. Sketchy nature of the poor evidence is perhaps indicated allusively by the sketchy nature of this particular map – both are poor quality, extremely unclear, and do not give a clear indication of consequences. The planned economic development does not intend to use smart growth, with high tech broadband involving high tech homeworking; nor will it build on the technological expertise of Surrey University; but it is intended to involve a significant proportion of low tech, low margin, land hungry activities (much more retail in an era</p>	<p>The National Planning Policy Framework states that key diagrams should indicate broad locations for strategic development, and the revised key diagram is considered to do this. It is not the purpose of a key diagram to show impact on views into and out of the AONB and National Trust land, or to show the consequences of development.</p> <p>The Key Diagram has been significantly redrafted to show the proposed key changes for the borough. This includes the proposals for strategic development areas, strategic employment sites, new railway stations and park and ride sites and changes to the Green Belt and countryside boundaries. A clearer base map has also been used which denotes places across the borough including villages and the River Wey</p> <p>New policies E1-E5 address our approach towards employment and the economy,</p>

Issue	Guildford Borough Council Response
of declining retail; 10 hectares of new warehouse space in an area famed for congestion)	and Policies E7-E9 address our approach to retail in the borough. The need for employment floorspace has been revised in line with the Employment Land Needs Assessment (ELNA), which was published in September 2015. This supersedes the previous ELA. The floorspace need has been revised, The planned retail is to meet needs identified in the Retail and Leisure Update Study 2014. This takes in to account anticipated changes in the nature of retailing over the plan period to 2033, including taking account of sales from internet and mobile phones, proportion of these sales that are not taken from bricks and mortar stores.
This is a query. What exactly is the new 'area of separation' on either side of the A3 and why is it required? It looks as though it encompasses the National Trust Land of the North Downs through from the eastern edge of the borough to Guildford. This land, as far as I am aware, is inviolable as it mostly belongs to the National Trust. Why should it form any part of a local plan?	The area of separation has been removed from the key diagram.
The pen sketch of the heritage of the borough is limited and deficient and is symptomatic of the lack of evidence for the historic environment	This issue will be addressed in more detail in the Heritage Topic Paper.

14. Comments on Question 6: The content paragraphs, policies and site allocations

Issues	Guildford Borough Council Response
Comments on Question 6	Comments on Question 6 have been addressed between in the table for Question 7 and the Planning for Sites responses. Comments relating to specific policies are addressed in the individual table for each policy

15. Comments on Question 7: Any other comments

Issue	Guildford Borough Council Response
General Comments	
Support the Draft Local Plan	Comment noted.
Change must be sensibly accommodated	Comment noted.
Impact on existing and future residents/ communities that will be affected	Comment noted.
Need to keep some open space in town for walking	Policy I4 Green and Blue Infrastructure protects all open space of public value within the town in line with the NPPF.
Unsound plan: <ul style="list-style-type: none"> The GBCS is unsound because it fails to apply a significance test to the review of various land parcels - sites being inaccurately assessed and / or over looked 	A planning inspector will determine whether the Plan is sound at an Examination in Public (EIP). The date for the EIP has not yet been set and will not be known until after the plan is submitted to the Planning Inspectorate. The Council consider that the Plan has been positively prepared, is justified through the evidence base, is

Issue	Guildford Borough Council Response
<ul style="list-style-type: none"> • Dismayed at the way the Local Plan has been explored and proposed. I believe it to be fundamentally flawed and simply not viable in its current state. • The plan is not positively prepared or justified as the outcome has been pre-determined in favour of a lower housing number. • Plan should be found unsound in due course on the basis that there is an absence of critical information 	<p>effective and is consistent with national policy.</p> <p>The Proposed Submission Local Plan: strategy and sites has been devised by the Council based on the principle of sustainable development and informed by a substantial body of documents known as the evidence base, including a Sustainable Appraisal. The plan aims to meet the borough's objectively assessed needs whilst recognising the constraints to development and the need to protect the special natural and historic environment of the area.</p>
<p>Many saved policies in the present Borough Plan are missing from this new Draft Plan</p>	<p>The Local Plan is in two parts. More detailed development control policies will be included within the 'Local Plan: Development Management Policies' document.</p>
<p>Local Plan shows little sign of recognising the major economic and social changes in Guildford over the last few decades</p>	<p>Disagree.</p>
<p>Council should make public their financial gain and where they would spend the money</p>	<p>Once the Community Infrastructure Levy (CIL) has been introduced, the Borough Council and parish councils are required to report annually on what the CIL receipts have been spent on.</p>
<p>We should be standing up to the government and telling them 'no more'.</p>	<p>The Government have stated that all Local Planning Authorities should have an up-to-date Local Plan in place by early 2017. The Proposed Submission Local Plan: strategy and sites has been devised by the Council based on the principle of sustainable development and informed by a substantial body of documents known as the evidence base. The plan aims to meet the borough's objectively assessed needs whilst recognising the constraints to development and the need to protect the special natural and historic environment of the area.</p>
<p>Object to plan as:</p> <ol style="list-style-type: none"> 1. Loss of Visual amenity 2. Loss of recreational amenity 3. Loss of agricultural land 4. Negative impact of wildlife 5. Destruction of the Green Belt 6. Pressure on all services 	<p>The Proposed Submission Local Plan recognises the importance of visual amenity, Policy D1 will require all new development to achieve a high quality design and to enhance the environment in which they are set.</p> <p>Open space of public value, including recreation land, is protected by the NPPF. Policy I4 Green and Blue Infrastructure protects land in line with the NPPF. The Council is currently updating the Open Space Sports and Recreation Study which will identify land of public value to be protected. It will also identify areas of deficit which can be addressed through the Local Plan and through Council strategies.</p> <p>Policy I4 will lead to net increases in biodiversity, in line with the NPPF and protects designated habitats.</p> <p>Infrastructure will be required to accompany new development where it is</p>

Issue	Guildford Borough Council Response
	<p>necessary in order for development to be acceptable.</p> <p>Green Belt boundaries should only be altered in exceptional circumstances (NPPF, para 83). We consider that there are exceptional circumstances that warrant an amendment to our Green Belt boundary due to the level of need that we have and our limited capacity to meet it outside the Green Belt. However, having reviewed our Green Belt boundaries, and demonstrating a supply of deliverable housing land over the plan period to meet the identified need for housing, we consider that the new Local Plan provides greater protection to Green Belt.</p> <p>Agricultural land quality is considered through the Sustainability Appraisal. Whilst we would seek to direct development away from best and most versatile land quality where possible, this needs to be considered alongside other factors.</p>
<p>Height/density:</p> <ul style="list-style-type: none"> • The Guildford Society would, on balance, support a Height and Density Development Plan Document alongside the Local plan to guide developers and the community towards a sustainable pattern of development which enhances and protects the borough. • The Plan should promote higher density in existing urban areas through redevelopment, especially in Guildford Town Centre, before considering Green Belt release. 	<p>The 'Proposed Submission Local Plan: strategy and sites' contains strategic policies, Policy D1: Making better places recognises that new development must respect its context, and states that all developments will “respond meaningfully and sensitively to the site, its characteristics and constraints, and the layout, grain, massing and height of surrounding buildings.” This policy will be used to ensure that new development is of a height and density relevant to its context. The supporting text has been amended to reinforce this and now includes a sentence which says, “The relationship of the built environment to the landscape must be taken into account and the transition from urban to rural character will need to be reflected in the design of new development with the green approaches to settlements respected.”</p> <p>Green Belt boundaries should only be altered in exceptional circumstances (NPPF, para 83). We consider that there are exceptional circumstances that warrant an amendment to our Green Belt boundary due to the level of need that we have and our limited capacity to meet it outside the Green Belt. As we moved through our spatial hierarchy we need to balance the benefits of doing so with the harm that this creates. There will reach a point where it will no longer be sustainable to provide more homes and we need to move to the next development option in the spatial hierarchy. There is not sufficient deliverable and developable land in the town centre to meet the identified housing need over the plan period.</p>
<p>The Draft Plan is not very clearly related to Guildford and its borough. The Guildford Society is concerned that such a 'generic' plan cannot be adequate for a town and borough with the characteristics, heritage, constraints and challenges that we have.</p>	<p>We consider that the Proposed Submission Local Plan is specific to this borough, particularly with regard to meeting its identified development needs, and allocating sites to do so. The Local Plan: Strategy and Sites, will be followed by Development</p>

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	Management Policies, the dates for which are set out in the Local Development Scheme.
We would welcome commitments in the plan to support the important work done by Guildford's Voluntary, Community and Faith Sector and the consideration of a community building (s) where they can achieve even more synergy by working alongside each other to best effect. This seems particularly important with the developments in the NHS and the Social Services looking for joined up services to support people to stay in their own homes and communities.	Comment noted.
<p>Environment:</p> <ul style="list-style-type: none"> • Number of omissions/ incomplete – no sustainability or environmental assessment • local plan does not follow the UK Sustainable Development Strategy 2005 in regard to 'living within environmental limits' 	<p>The draft Local Plan Strategy and Sites (2014) and the 'Proposed Submission Local Plan: strategy and sites' (2016) are/were accompanied by both a Sustainability Appraisal and a Strategic Environmental Assessment.</p> <p>The 'Proposed Submission Local Plan: strategy and sites' follows requirements set out in the NPPF and legislation. The NPPF requires Local Plans to deliver growth whilst also addressing sustainability across the environmental, economic and social dimensions.</p>
Partridge field opposite Beechcroft Drive is Onslow's immediate access to the greenbelt as such is consistently utilised by ramblers, dog walkers, joggers, people engaging in Equestrian pursuits, children's groups, triathlons this should therefore be categorised as a designated green space.	This comment is addressed in the comments against Policy 19.
<p>Evidence base:</p> <ul style="list-style-type: none"> • The plan does not draw on the Landscape Character Assessment as evidence. • No joint SHMA • No SEA • No SA • No infrastructure document • Evidence base errors and figures out of date • Calculations shown, but not the workings • Assumptions not supported by evidence • GB study issue on Plot D6 and D4 • The Evidence Base does not logically separate the areas for protection from the areas of opportunity and, consequently, neither does the Draft Plan. The Guildford Society is concerned that this leaves too much to chance (we recognise that although there may be policies in the Development Control Local Plan to deal with these concerns, the first draft of that document has not yet been published). It is, therefore, not clear that the areas for which development is proposed are actually the same as the areas of need. No attempt has been made to designate challenging areas 	Comments relating to the evidence base have been addressed in the table for Appendix C: evidence base.

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<p>for special treatment and regeneration.</p> <ul style="list-style-type: none"> • The ONS data used was flawed and the refined data has yet to be added • have attempted to address OAN in respect of housing- it does not go far enough • The housing figure adopted in the DLP (652 dpa) is actually lower than the minimum OAHN cited in the draft SHMA - 670 dpa would be the minimum 	
<p>Sites:</p> <ul style="list-style-type: none"> • Site selection process has been done backwards. It has found GB sites for release and chosen the most sustainable among them. It should have found the most sustainable sites and then tested them against the GBCS. • Sites have not been selected based on how much they would reduce commuting e.g. school sites should be reused as they are accessible without the car • Lack of site assessment criteria available about possible sites 	<p>The NPPF advises that there are three dimensions to sustainable development: economic, social and environmental. The Local Plan needs to balance these dimensions when attempting to plan to meet development needs. The spatial options considered when preparing a plan are assessed in the Sustainability Appraisal. Whilst travel distances are a consideration, so are other aspects of sustainability. The identification of possible sites for development in terms of the preparation of the Green Belt and Countryside Study is part of the consideration of the environmental dimensions of sustainable development. The topics papers published alongside the 'Proposed Submission Local Plan: strategy and sites (July 2016)' will explain in more detail, as will the Sustainability Appraisal.</p>
<p>Transport:</p> <ul style="list-style-type: none"> • The plan should introduce cheaper public transport. The bus is prohibitively expensive and does not run late enough. A trip into town should be cheaper than car parking plus petrol. 	<p>The cost of public transport is not a matter for the Local Plan.</p>
<p>Consultation:</p> <ul style="list-style-type: none"> • It is not clear how the feedback from the 2013 consultation has been implemented in this plan/it has been ignored • The Council isn't listening, and consult with the full/whole council • Consultation a shambles and waste of money • Take more account of comments than last year • Representatives at meetings didn't know area – disturbing • Hard copies not readily available for detailed assessments, studies and appendices therefore consultation flawed • CD documents too large and complex to follow, not accessible • Complaint about closing time of consultation 5pm and 11.59pm • No tracked changes in documents – hard to follow • No indication of changes to plan as result of previous consultation • Consultation process does not engage enough with local residents and neighbourhoods/ take local opinion into account • Presumptuous to assume that the 'silent majority'/ 'hard to reach groups' agree with the LP • No indication of changes to plan as result of previous consultation 	<p>Comments from the Issues and Options consultation and Draft Local Plan consultation and have been utilised to inform and revise the approach and policies of the proposed submission Local Plan. A 'Statement of Community Involvement' will be submitted with the 'Proposed Submission Local Plan: strategy and sites' to the Planning Inspectorate to illustrate how we have engaged with our community and utilised the feedback received to inform the plan making process.</p> <p>The consultation conducted thus far has met the national legislative requirements for consultation and all comments have been presented and responded to in this consultation statement.</p> <p>The consultation for the 'Draft Local Plan: strategy and sites' was extended from statutorily required period of consultation being 6 weeks to 12 weeks to allow for the holiday period.</p>

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<ul style="list-style-type: none"> No feel for the weight of opinions expressed – should have a prominent discussion of results in the central part of the LP Lack of communication/ publicity about LP from the Council – many people knew nothing about it The plan should incorporate a consensus of the views 'consultation period' earlier this year has been ignored by your councillors and the plan put forward as originally documented Concerned about the lack of transparency of the Local Plan and consultation – question integrity Questionnaire is misleading – questions are too complicated/ hard to answer – need straightforward questions Consultation held over the summer holiday when people are away 	
<p>Urban green space:</p> <ul style="list-style-type: none"> The plan lacks a section on urban green space and recreation/amenity 	<p>The 'Proposed Submission Local Plan: Strategy and Sites' includes Policy I4 which deals with open space and recreation/amenity.</p>
<p>Definition of 'sustainable':</p> <ul style="list-style-type: none"> The plan needs to provide a definition of 'sustainable'. Not clear what definition of 'sustainable' has been provided in the plan 	<p>Sustainable development is defined in the Glossary of the 'Proposed Submission Local Plan: strategy and sites'.</p>
<p>General objections:</p> <ul style="list-style-type: none"> Object to the plan/no one supports the plan Question the integrity of the plan There is no joined up thinking with proposal and plan Republish the plan with clearer detail, contents and focus on impact on roads and environment Plan needs to support a clear vision of what we want the borough to be like in future New Plan should be drawn up or LP should be rejected Growth driven Lack of funding (from SCC and HA) Infrastructure not comprehensive, realistic or workable It's a charter for developers Start plan again 	<p>We will need to demonstrate to an independent planning inspector that our plan is sound and meets the tests set out in paragraph 182 of the NPPF. Namely that it is</p> <ul style="list-style-type: none"> Positively prepared Justified Effective Consistent with national policy <p>The plan includes an infrastructure schedule which sets out the infrastructure necessary to support the plan. This includes detail on when it is needed, who will deliver it and the likely cost and funding.</p>
<p>The LP is too complicated and long to understand fully – simplified version should be proposed – CD documents too large to follow, not accessible purposefully done?</p>	<p>The Council tries to make the Local Plan as accessible as possible but it must meet a number of statutory requirements, which limits the scope for simplifying it.</p> <p>The Council provided two versions of the draft Local Plan Strategy and Sites on the consultation webpage – a PDF version and an online version. The online version should be accessible to everyone who uses the internet as it does not require the download of files. We also provide PDFs which we split into four parts in order to reduce the file size.</p>

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	The documents on the CD were mostly background technical documents which we acknowledge may be difficult for the lay person to follow. However, as technical evidence it is important that these are robust and stand up at examination.
Support Sir Paul Beresford's response	Comment noted.
Key stakeholder group should not include people with a conflict of interest.	We have accepted all comments regardless of their interest.
The Local Plan acts on behalf of property developers/profit not local communities or local authorities	The NPPF tasks us with preparing an up to date Local Plan that achieves sustainable development. The Local Plan will be subject to independent examination by the Planning Inspectorate, prior to being adopted by the Council.
Plan- making process: <ul style="list-style-type: none"> • Responses to this survey should be weighted by the number of people they represent • Object to the 'top down' way in which the Plan has been drawn up • Planning Executive and GBC are being undemocratic – should be a local decision not a Government one • Residents should be allowed to vote on unwanted expansion 	The Local Plan is not a referendum. A planning inspector will assess whether our plan is sound. Namely that it is positively prepared, justified, effective and consistent with national policy. It would not be appropriate to weight comments. Planning regulations stipulate that Local Planning Authorities are responsible for producing Local Plans. However, we are required to do this in consultation with local residents, organisations and other statutory consultations. Public consultations were previously held for the 'Issues and Options' publication and 'Draft Local Plan: strategy and sites' 2014. A similar process will take place for the 'Proposed Submission Local Plan: strategy and sites'. Comments previously received have been used to revise the policies and sites contained within the Proposed Submission Local Plan: strategy and sites.
Magnitude of the costs that will be generated from the Plan is worryingly high	Preparation of a local plan is a complex and lengthy process. It is important that we ensure to the extent possible that the plan we prepare is capable of being found sound and can withstand any challenges.
Object to GBC committing to unsustainable development in exchange for subsidies	The sustainability of the plan is assessed as part of the Sustainability Appraisal process. The government intends the Community Infrastructure Levy (CIL) to incentivise development
Develop a holistic, community focused plan for the Town & Borough	
Formatting of Local Plan: <ul style="list-style-type: none"> • No explanation in the Pink boxes of how you intend to implement the policies. • How will the plan be implemented? • No tracked changes in documents – hard to follow • Too much important information is outside the policy boxes • Document is far too big especially considering pieces are missing • Strategy and Sites draft is complex and too difficult to determine how this will work in practice 	The document has been structured and formatted to ensure that is as simple to follow as possible for all readers, The pink boxes have now been restructured to be more specific. Each pink box contains a table to address the monitoring indicators, the table sets out the indicator, the target and the data source. The document has undergone significant changes since the Draft Local Plan. It is not possible and would be meaningless to provide a track-changed document. The information contained in the policy boxes must be enforceable. The text outside of the boxes provides an introduction to the policy, explains, describes the policy

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	and provides a reasoned justification for the policy.
Policy wording: <ul style="list-style-type: none"> • Poorly worded policies and unenforceable • No cohesions and comprehensibility • Weak and lack objectives for guiding planning and development control 	This comment has been responded to in table on National Guidance
The LP has been developed to fulfil GBC's intentions as stated in the Corporate Plan for 2013 - 2016	Comment Noted.
The Corporate Plan was not subject to any consultation of Guildford Borough residents to canvass views prior to publication	Not relevant to DLP or an LP instrument.
Failure to issue the Delivering Development draft makes evaluation of policies difficult	We have taken a slightly different approach from the 2014 draft Local Plan, as the Proposed Submission Local Plan now includes detailed policies for retail and town centre, employment and green belt. However, most development control policies will be included in the Development Management Policies DPD.
Post-adoption of plan: <ul style="list-style-type: none"> • Expect rigorous enforcement of the conditions of grant of planning improvement to avoid errors • GBC must enforce any planning agreements made with organisations before, during or after the development of the 2003 Local Plan 	Comment noted.
LP does not meet the approval of the Local Communities, from MP's to Parish Councils	Objection noted.
Less waste of time and energy with matters such as building permission being granted and less red tape (for example Queens Road Guildford and Burpham School.)	Comment noted.
GBC must seek ways to prevent developers from "banking" planning consents	Once a planning consent has been granted, a developer generally has three years to implement it. Once it has been implemented, there is no time limit on completion. If new homes are not being delivered to meet the housing target, there is a possibility that the plan would need to be reviewed.
There are no policies to tackle deprivation	GBC recognises that there are pockets of deprivation within the Borough and Policy 'H1Homes for All' and 'H2 Affordable Homes' are two examples of mechanisms to address deprivation.
No stated inclusion policy LGBT + Lesbian, Gay, Bisexual and Transgender	This is not a land use planning consideration. However, of note, is policy D1 in the Proposed Submission Local Plan, that requires developments of 25 homes or more to "provide a harmonious, integrated mix of uses, where appropriate, that fosters a

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	sense of community and contributes to inclusive communities that provide the facilities and services needed by them”.
Consideration needs to be given to the aesthetic development	The policy on Making Better Places (Policy D1) seeks high quality design that enhances the environment in which it is set.
<p>Green Belt:</p> <ul style="list-style-type: none"> • Object to building on Green Belt – stricter protection • Should be using Brownfield sites before thinking about Green Belt • No reason to inset any of the villages from Green Belt • Building on Green Belt is contradictory of previous planning applications • No evidence to change settlement boundaries • No exceptional circumstances • Create sprawl/ urbanisation • Endorse and support Guildford Green Belt Group comments • Green Belt Contribution assessment scores have changed with no explanation • Policy 10 - no green belt development anywhere • Building on Green Belt and flood plains fails to follow guidelines and European statute • Specifies its ok to build on Green Belt – this isn't Government policy • Unsustainable development betrays concept of Green Belt 	These comments have been responded to in the tables for Policy 9, Policy 10 and Appendix C: Evidence Base.
Amount of development proposed is too high – revise housing number	This comment has been responded to in Appendix C: Evidence Base
Who is the affordable housing going to be affordable for? Will it actually be affordable?	Approximately 40% of new homes provided by the Local Plan will be affordable housing. The definition of affordable housing is set out in the NPPF (glossary, page 50). The SHMA identifies a significant need in this borough for affordable homes.
No consideration has been made within the Draft Local Plan for the improvement of 1950 dwelling stock which have now passed their design life and should be considered for replacement	Replacement dwellings can be considered on their own merits through individual planning applications.
Over development of the South East of England – should be distributed evenly	The development targets set in the 'Proposed Submission Local Plan: strategy and sites' are based on the borough's objectively assessed needs. Our spatial strategy is based on sustainability considerations and our spatial hierarchy rather a proportionate growth approach.
Housing proposals too dense in the West of the Borough	Density is considered on a site by site basis, based on planning history, constraints and the character of the area. More information is available in the Land Availability Assessment and topic papers, explaining the approach to the delivery of housing.
<p>Housing target:</p> <ul style="list-style-type: none"> • Bring the annual target back to 322 • Housing requirement in Guildford is for people who are not yet in our area/ migrants - not considering current residents 	<p>These comments have been responded to in Appendix C: Evidence Base.</p> <p>The 'Proposed Submission Local Plan: strategy and sites' includes a sufficient buffer to ensure that there is flexibility in our supply in order to meet our housing</p>

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<ul style="list-style-type: none"> • Need a professionally researched target of housing need presented to local neighbourhoods for discussion • 652 dpa in the Draft LP does not meet objectively assessed need and will not be sufficient to significantly reduce the need for affordable housing • Local Plan should meet objectively assessed needs with sufficient flexibility to adapt to rapid change 	requirement.
Support amount of development proposed for the borough	Comment noted.
A specific policy needs to be introduced to protect bungalows for future need	Each planning application must be determined on its own merits; it is not possible to protect bungalows.
We need housing either owned by the council or housing associations	Affordable housing is addressed in greater detail in Policy H2. Policy H1 seeks a wide choice of homes to meet a range of accommodation needs.
NHBC 10 year guarantee period only includes structural failure	Not within the remit of the Local Plan
Government should limit buy-to-let properties and keep them as affordable homes	Comments noted but directed at Governments approach to buy-to-let.
Current house prices will drop	Comment noted.
University seems to have too much influence on the plan, acting in its interests only, not the interests of the whole borough. Why is the Council letting the University have such influence?	All comments received on the draft Local Plan have been treated equally, and none have been given a greater weight than others.
Not organic growth but International immigration the majority of which is University led	This comment has been responded to in Appendix C: Evidence Base
The University should provide housing on campus to release affordable housing for residents	The University of Surrey continues to build student accommodation on its Manor Park campus, and has recently applied for planning permission for further student accommodation (200 and 953 bed spaces).
Need self-build housing which is more affordable	Some self-build or custom housebuilding plots are likely to be provided on the larger strategic development sites.
Should be means of ensuring housing goes to those needing to be housed not buy-to-let or a second home	Controlling who purchases new market homes is outside the remit of the local authority. However, the local housing authority does allocated affordable housing.
Should be affordable accommodation for vulnerable & homeless and people who have lost work	The local housing authority does allocate affordable housing to people on the Housing waiting list who are prioritised according to need.
Back garden developments should be banned	Development of private residential gardens can be appropriate in some areas, and is considered on a case-by-case basis through determination of planning applications. Small sites such as these have contributed towards the supply of new homes, and will continue to do so where land remains available and development proposals are suitable and comply with relevant planning policies.
Mixed housing to be built to avoid developers always building rural traditional houses	Policy H1 seeks a wide choice of homes, and policy D1 seeks high quality design.
Plan for a mix of housing based on demographic and market trends and the needs of different groups in the community	The Housing for all policy addresses the need for a mix of tenures, types and sizes of homes.
Housing target should include house extensions granted the past few years.	Housing extensions are a separate issue to new housing.

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The emphasis of national policy on building more homes does not take into account local aspirations and special circumstances.	This comment has been responded to in Policy 10
Demographic projections are distorted by student numbers at Surrey University	<p>The NPPF requires that our assessment of housing need takes account of migration. University expects an increase in international students in the coming years, which we must take account of in assessing future need. We can only consider the evidence that is available and cannot predict what future changes in Government policy may be. We will continue to update the SHMA as and when new evidence becomes available.</p> <p>Whilst international migration is a significant proportion of our projected growth it is not possible to simply remove a component of population change and continue to rely on the figures in the remaining components of population change as this does not acknowledge the relationship between them. This is particularly the case between international and internal migration patterns.</p> <p>Guildford's population is expected to grow much more strongly for younger age groups than the national population (younger than 29 age group) and generally weaker for older age groups. Younger age groups are much more likely to be mobile (i.e. migrate outside of Guildford) than older age groups. The effect of this type of population change means that our population is growing in the age groups that are more likely to migrate at a greater rate than nationally. This means that Guildford's level of out-migration is also expected to increase by a higher proportional amount thus reducing the level of population growth and associated housing need.</p> <p>A SHMA that did not include international migration would not define our full objectively assessed housing need and would therefore not be considered robust or sound by a planning inspector. The level of international in-migration is a function of what makes Guildford and is due to factors such as the Royal Surrey County Hospital, University of Surrey and Surrey Research Park.</p>
Worplesdon and Stoughton full to capacity with homes	<p>Few development opportunities have been identified in the Land Availability Assessment within the urban area of Stoughton or the village of Worplesdon. Where development proposals do come forward, they will be considered through the determination of a planning application.</p>
<p>Gypsy and Traveller sites:</p> <ul style="list-style-type: none"> • The plan puts Gypsy and traveller sites too close to permanent homes/ no need for more traveller sites in the area 	Traveller sites have been allocated to meet the need identified in the Traveller Accommodation Assessment.
Going for a 20 year period requires more land for housing to be identified and is an 'own goal' given opposition to Green Belt release.	We need to ensure that we have a 15 year plan period from the date of adoption. The base date of the Proposed Submission Local Plan in 2013 as this is consistent

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	with our evidence base which assesses our development needs.
Not enough detail about infrastructure in key facts	Detail of existing infrastructure is provided in the Infrastructure Baseline 2013. The key facts and figures section of the 'Proposed Submission Local Plan: strategy and sites' is designed to provide a brief context of the borough.
The DLP does not address existing infrastructure deficits Infrastructure is insufficient – could not cope with proposed development	We cannot expect developers to fix existing infrastructure problems unless their development would make the situation worse (and then we can use the Community Infrastructure Levy, but not planning obligations)
Impact on utilities, medical facilities, school/ education New infrastructure will be required in the Local Plan period to ensure sufficient water resources and supply infrastructure for the area	Infrastructure needed to support planned development is outlined in the Infrastructure Schedule appended to the Local Plan. Further detail of infrastructure needs is summarised in the Infrastructure Delivery Plan.
Impact on flooding	The site allocations included within the 'Proposed Submission Local Plan: strategy and sites' have been informed by a Level 1 and 2 Strategic Flood Risk Assessment and sequential test. In line with the NPPF, development proposals will be directed first towards areas at least risk of flooding.
Not enough jobs in the area	The level of new employment floorspace has been calculated from the need generated by the anticipated growth in jobs. It is based on the Objectively Assessed Need (OAN) and not aspirational growth. The need has been assessed by consultants AECOM who produced the Employment Land Needs Assessment (ELNA), published in Sept 2015. The mean average of three economic forecasts of the number of employees in the borough. AECOM then translated this into the need for floorspace using historic trends.
Cyanide deposits make development unsafe	A general assessment of available information regarding potential contamination has been considered for sites assessed in the LAA where appropriate, however, if needed, more detailed assessment can be carried out as part of the preparation of development proposals and considered when a planning application for development is determined.
Football stadium should be relocated to Surrey Sports Park/ university sports area	No need for more football pitches at the Surrey Sport Park
Developer should produce a water/ drainage supply strategy on how water will be provided to the new development and ensure that infrastructure is brought forward ahead/ in tandem with the development	They will be required to for large sites where its not clear sufficient capacity will be available
A Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.	This is often used, must pass the tests for conditions, including of being "necessary" for the development to go ahead
Object to school at West Clandon	No longer proposed for a school
The council needs to ensure it fully understands the value of development being created and what can therefore realistically be levied. The valuation methodology employed means that very small changes in inputs such as sales price or build cost produce major changes in profitability or what can be offered by way of social housing.	We appreciate the sensitivities inherent in the assumptions of the Local Plan Viability Study

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Similarly when it comes to the exercise of PD rights - which may result in a poor quality scheme which nobody in reality would build but no social housing - the council needs to obtain expert advice in negotiating with the developers in order to ensure that when giving consent in a location which, but for the PO rights, might not be suitable, they obtain an appropriate contribution. They should also ensure that the social housing obtained is available long-term for the benefit of those serving the local community which means social rented although it may well be off- site.	
Roadside drains and ditches are currently blocked and not adequately maintained. The drains have been cleared in the past but this does not fix the problem. This needs to be addressed before a new plan is brought in.	Where this is resulting in surface water flooding problems, this is being address in the Surface Water Management Plan Action Plan.
Development proposed is for economic growth, not for local need	The level of new employment floorspace has been calculated from the need generated by the anticipated growth in jobs. It is based on the Objectively Assessed Need (OAN) and not aspirational growth. The need has been assessed by consultants AECOM who produced the Employment Land Needs Assessment (ELNA), published in Sept 2015. The mean average of three economic forecasts of the number of employees in the borough. AECOM then translated this into the need for floorspace using historic trends.
No consideration for the infrastructure effects on surrounding boroughs – assume neighbouring boroughs will provide the lack of infrastructure in Guildford	See Duty to Cooperate work
Lack of trust in councillors, people and process involved with LP	Comment noted.
Understand GBC is under major strain to address all concerns	Comment noted.
Proposals are contrary to NPPF	Comment responded to in table for national guidance and policy.
No ISBN or Web addresses for the key evidence documents has been provided- cross referencing difficult	Comment noted, links to the key evidence was not embedded in the document but it was readily available on the Council website and at information events across the Borough during consultation.
Cost of Plan was too much, could only see if you had a computer or could get to the library or swan lane	GBC conducted 39 events across the borough over a 12-week period in 2014, in addition to this the plan was readily available at these events and other notary locations.
Can comments be taken into account even if no longer live in borough?	Yes, the Draft Local Plan (regulation 18) is open to the public.
The LDS does not provide for further engagement other than commenting on soundness of plan	The next consultation will accept all comments and not limit them to the soundness of the plan.
It is not clear how the feedback from the 2013 consultation has been implemented in this plan/it has been ignored	Information and reports available at this link http://www.guildford.gov.uk/article/3976/Issues-and-Options Detail how responses from the Issues and Options consultation has informed the developing LP.
It also appears that comments made in previous consultations have informed the production of the DLP, but this is simply not true. Comments by residents have been ignored, I have personally complained to GBC that comments were attributed	This consultation statement summarises the key comments provided during both regulation 18 consultations and responses to all comments have been provided.

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to me that I did make and comments that I did make were lost.	
<p>Document accessibility:</p> <ul style="list-style-type: none"> • The documents are huge & not going to be accessible to people. Not all people will be involved because they cannot access documents. They don't understand implications. • Ensure accessibility to the LP for all 	<p>GBC has and continues to widely publicise the DLP. The documents are large but only to ensure that the complexity and challenges of the GBC area are covered adequately.</p> <p>The Local Plan will be available in hardcopy and available on the council website.</p>
<p>The language used in the plan, and in the summary, is impossible for some people. The NPPF requires local input (para. 1) so must be approachable for local people.</p>	<p>Comment noted.</p>
<p>I strongly recommend that the insight and knowledge of residents in the parishes across the county are taken into account, and a better plan is made.</p>	<p>Comment noted.</p>
<p>The events held around the borough were to promote the plan, not to listen to residents' views. Some were dominated by developers and other vested interests.</p>	<p>The information events held around the borough welcomed all of the public with GBC officers readily available to discuss the DLP.</p>
<p>Brownfield approach:</p> <ul style="list-style-type: none"> • Should be a 'housing first' policy on Brownfield sites instead of allocating commercial use • Brownfield land first and the need to exploit the conversion from commercial to domestic use 	<p>Brownfield land is at the top of our spatial hierarchy. However, there is insufficient land to meet our objectively assessed housing needs. We need to ensure we meet all our development needs and this includes employment land.</p>
<p>The LP should contain a policy relating to the Thames Basin Heaths Special Protection Area - lack of a TBH SPA policy could severely affect the deliverability of the Local Plan</p>	<p>The Proposed Submission Local Plan has a Thames Basin Heaths Special Protection Area, policy I5.</p>
<p>Inclusion of a concise and flexible policy which refers specifically to telecommunications developments</p>	<p>This local plan is about strategy and sites, not detailed development management policies</p>
<p>Policy support in the Local Plan for water supply infrastructure</p>	<p>This is included in the general Infrastructure Policy, and in the Infrastructure Schedule appended to the Local Plan</p>
<p>The Draft Local Plan ignores current Green Travel Plans in favour of housing developments</p>	<p>The NPPF requires that "All developments which generate significant amounts of movement should be required to provide a Travel Plan" (paragraph 36). Further information on the use of travel plans is given in the Reasoned Justification for Policy I3 Sustainable transport for new development in the 'Proposed Submission Local Plan: strategy and sites'.</p>
<p>The need to positively plan for the Guildford's future should be emphasised throughout the DLP</p>	<p>Comment noted.</p>
<p>No evidence shown of Duty to Cooperate - Has been no liaising with surrounding boroughs/ borough and district councils</p>	<p>In preparing the Local Plan the Council have worked collaboratively with neighbouring Local Authorities, Surrey County Council and various other partner organisations. However, it will be for the Planning Inspector to determine whether the Council has passed the Duty to Co-operate.</p>
<p>Must have opportunity to comment again once robust SHMA is available, not only on submission version. Without this the Plan is not open or transparent. The SHMA is flawed</p>	<p>We will accept all comments as part of the consultation on the regulation 19 version of the Local Plan.</p>

Issue	Guildford Borough Council Response
The plan needs to have detail in the short term (5 years) and be very flexible, with a feedback mechanism, in the longer term to allow for the uncertainty in the numbers of homes needed and for impact of developments made to be assessed.	A housing trajectory is included in the Land Availability Assessment, which informs a housing target set out in the Proposed Submission Local Plan. Flexibility is built into the plan with potential provision in excess of the requirement, and a target that rises through the plan period acknowledging likely lower delivery in the early years of the plan. This still represents a significant boost in the supply of housing following adoption of Proposed Submission Local Plan.
Appearance of borough: <ul style="list-style-type: none"> • Will change the character/ environment of the Borough- Demise of the historic town, AONB and landscape • Overdevelopment and high rise development may affect the ability to enhance the river scene 	The historic environment is an important part of the character of the borough that we will seek to conserve and enhance through policy D3: Historic Environment and policy D1: Making better places.
Nothing to show that any constraints have been taken into account	Constraints have been taken account of in the Proposed Submission Local Plan. Further detail on the selection and assessment of sites is out in the Land Availability Assessment and the topic papers.
The LP is a strong directive move away from Business	The level of new employment floorspace has been calculated from the need generated by the anticipated growth in jobs. It is based on the Objectively Assessed Need (OAN) and not aspirational growth. The need has been assessed by consultants AECOM who produced the Employment Land Needs Assessment (ELNA), published in Sept 2015. The mean average of three economic forecasts of the number of employees in the borough. AECOM then translated this into the need for floorspace using historic trends.
Want Guildford to avoid over-expansion of retail areas	Guildford Retail and Leisure Update Study quantifies demand for additional retail development over the plan period, simply to maintain a constant market share of retail spending from the catchment area.
The LP needs to achieve balance between economy, society and the environment by advisory bodies and authorities working together	This is exactly that the Local Plan seeks to achieve.
Discourage avoidable car use by promoting attractive alternative - rethink on policies that have left streets crammed with parked cars	The policy on Sustainable Transport for New Developments will help achieve this.
Town image and appearance could be improved by good architecture and quality design	Agreed, policy D1: Making better places recognises the importance of the quality of design for new developments.
Vision: <ul style="list-style-type: none"> • The time span of the vision needs clarity • The LP needs better developed, coherent and ambitious strategic vision for the future of Guildford • A World Class town needs to be very bold in plans, not just aspirational • Vision is not exciting enough - use Guildford Society suggestion • Change needs to be 'considered' and 'progressive' 	This is addressed in the revised vision in the Proposed Submission Local Plan.
The LP fails to include a policy on Neighbourhood Plans	The role of neighbourhood plans is set by national legislation, policy and guidance. There does not appear to be a need for additional Local Plan policy.
GBC planning office has deliberately withheld and worked against the Burpham	The Council's planning department has consistently supported the Burpham

Issue	Guildford Borough Council Response
Neighbourhood forum	Neighbourhood Forum.
The policies do not provide a clear indication of how a decision maker should react to a development proposal	Any planning applications will be considered in accordance with national planning policy, the Local Plan, and any other material planning considerations.
Minority groups within Guildford should be considered	The previous consultation particularly sought to involve hard to reach and minority groups in discussions. The Homes for All policy seeks to provide for different types of accommodation needs within our community.
The impact threshold proposed in Draft Policy 15 and 16 has not been appropriately substantiated	Comment has been responded to in the table for Policy 15 and 16
GBC must not issue any further planning consents to the University until its obligations under the 2003 Local Plan have been fully discharged	Without specific details it is difficult to respond to this comment. Recent planning applications by the University have been for development at the Manor Park campus.
Proposals are unsustainable	The Proposed Submission Local Plan must conform with the NPPF, for which the overall aim is to achieve sustainable development. The Proposed Submission Local Plan is informed by Sustainability Appraisal, and is subject to full independent examination by the Planning Inspectorate prior to adoption. If an inspector has concerns that the plan does not achieve sustainable development, the plan will not be considered sound. One of the four tests of soundness is that "the plan should enable the delivery of sustainable development in accordance with the policies in the Framework."
Using smaller output areas would provide more targeted policies	The Local Plan Strategy and Sites document is strategic and high level in nature. More targeted local policies may be implemented through individual neighbourhood plans.
The Draft Plan notes that "We do have a skills shortage in some sectors" but fails to note that we have a resource of young people with low/no skills as highlighted by the LSOA study. The Draft Plan should provide for both ends of the spectrum.	The Local Plan Strategy and Sites document is quite limited into what it can achieve with detailed issues such as skills shortages and young people needing skills. It focuses on the strategic, high level issues. This issue can be included with the development management policies.
Policy 1 should clarify that the presumption in favour of sustainable development does not apply to areas affected by the Birds Directive	Policy 1 (now known as policy S1 of the 'Proposed Submission Local Plan: strategy and sites' uses standard wording recommended by planning guidance. Biodiversity issues are addressed elsewhere in the plan.
The river as an open space and public amenity should be preserved and enhanced	Policy 19 has been rewritten and new Policy I4 Green and Blue Infrastructure protects public open space supports enhancement to the river.
Farmers will be seeking permission for new agricultural buildings - For agriculture to become sustainable it will be essential that developments are able to gain planning permission easily	Buildings for agriculture and forestry are appropriate in the Green Belt and can be delivered through planning applications. Therefore it is not considered that an additional Local Plan policy is needed.
No mention of the National need to maintain agricultural land	The Land Availability Assessment references the agricultural grade of land. This is further considered in the Sustainability Appraisal. The agricultural grade of land is one consideration in the dimensions of sustainable development: social, economic and environmental

Issue	Guildford Borough Council Response
The plan is quite vague about specific allocations	The site allocation policies give specific details on the site, the allocated use, the requirements and the opportunities.
Build new town on south side of the Thames estuary	We are required to consider the needs within our Housing Market Area and Functional Economic Area. The South side of the Thames estuary is not within this area.
Improve existing areas/sites	Comment noted.
Support allocation of allotments - will benefit the community	Comment noted.
Development at Gosden Hill Farm and the school at Cuckoo Farm should be withdrawn	The Proposed Submission Local Plan does not propose development at Cuckoo Farm, however, Gosden Hill remains a strategic development site, delivering approximately 2000 new homes.
There is no enhanced land value with agricultural development and therefore the CIL would have to be paid from revenue	Agricultural development will not be asked to pay CIL
Build on the old Vokes site at Henley Park for instance should be enough storage space at Slyfield green and Vokes could be used for housing	This site is within 400m of the Thames Basin Heaths SPA and therefore not suitable for residential development.
Use superstores for housing	We are required to meet the need for retail floorspace, as well as housing. Sites also have to be available for development, to ensure delivery.
Not communicated any standpoint on using land wisely in relation to employment land	The previous ELA has been superseded by the 2015 Employment Land Needs Assessment (ELNA). This ELNA identifies the need for 4.7 – 5.3ha of Light Industrial (B1c), Industrial (B2) and Warehousing and Storage (B8) uses and between 37,200 sq m and 47,200 sq m of Office (B1a) and Research and Development (B1b) floorspace. These figures have been taken forward into the Local Plan (reg 19). The sites identified in the previous ELA have been superseded by those identified in the Land Availability Assessment (LAA) 2016.
Use Walnut Tree Close for housing	Some sites on Walnut Tree Close are allocated in the Proposed Submission Local Plan for housing. Some sites in this area are not suitable for new homes due to high flood risk.
Support Site 30 - 77-83 Walnut Tree Close - site is available and deliverable within the short term	Comment noted.
Support development at Land to the North of Gravetts Lane, Guildford	Comment noted.
Develop in Dunsfold – has budget for necessary infrastructure	Whilst the site is within the housing market area, it is located outside of Guildford borough boundary.
Develop Land at Bell and Colvill, Epsom Road. Logical location for the extension of the settlement	The Proposed Submission Local Plan allocates land to the rear of this site, and proposes the site is included in the settlement boundary.
Include Land Rear of Chinthurst Lane, Shalford for development	Comment noted. See the Land Availability Assessment for more information, which identifies realistic candidates for development, and discounted sites.
Reserve land at Ash station for a road bridge and an additional off-street car park – don't use for housing	The 'Proposed Submission Local Plan: strategy and sites' allocates land for Ash railway station level crossing closure and new bridge scheme (Policy A30)
Ash is sensible to be more developed	The Proposed Submission Local Plan: strategy and sites' allocates land for

Issue	Guildford Borough Council Response
	development in the Ash and Tongham area.
Include Nuthill Farm for development for housing	Comment noted. See the Land Availability Assessment for more information, which identifies realistic candidates for development, and discounted sites.
Notable that two small sites, Aldershot Road near Northway and site between Thortons Close and Worplesdon Road developed for executive homes rather than for affordable housing	The 'Proposed Submission Local Plan: strategy and sites' proposes to reduce the site size threshold for provision of affordable housing so more sites are required to make provision.
Do not develop on Tunsgate Square, Guildford	It has planning permission for more restaurants and cafes and less retail floorspace.
Object to possible Park and Ride on Tangle Lane	Objection noted.
Object to building on Braboef Manor - AONB	Objection noted.
Object to building on Pewely Down	Objection noted.
Object to Potential Major Development Area (PMDA) between Flexford and Normandy	Objection noted.
Object to including the land east of Leapale Road on Site 20	Objection noted.
Develop on Pond Meadow School – it is brownfield and currently an eyesore	The 'Proposed Submission Local Plan: strategy and sites' allocates this site for redevelopment.
Support Site allocations for allotments 104, 105, 125	Comment noted.
Support Site Allocations for Safeguarded Land 118 - 123	Comment noted.
Support including Ewbank's site within Development Site 74 - proposed allocation should also include the retention of Ewbank's Auction Rooms either in its existing building) or in a new building located within the site.	Comment noted.
Object to Site 74	Objection noted.
Area of land between Clandon and Burpham would be a suitable area to develop provided links on / off A3, North and South bound	The Proposed Submission site allocation policy A25 requires that any proposals for the development of the site should have regard to the potential opportunity to provide an all movements junction of the A3 trunk road with the A3100 London Road and the B2215 London Road. This could form part of the proposals for Highways England's emerging A3 Guildford scheme which are being developed in Road Period 1 up to 2019/20 as required by the Department for Transport's "Road Investment Strategy". This is likely to preclude development on a [30m] metre strip of land on the northern boundary of the site adjacent to the A3 and to the east of the new junction as required above. The strip of land could potentially be required for the provision of a connector road.
Allocate of land to the south of the A25, Epsom Road, Guildford for a sustainable urban extension, comprising mixed use residential led development that would provide a mix of housing	Comment noted. See the Land Availability Assessment for more information, which identifies realistic candidates for development, and discounted sites.
Land at Send Barns Lane should be identified as Safeguarded Land	We no longer believe that safeguarding is an appropriate option for Guildford. This is discussed further in the Green Belt and Countryside topic paper.
Land used for parking at the Electric Theatre and land used as the car park next to the 'White House' and behind the old "Greyhound" , as well as the car park between	The Land Availability Assessment identifies realistic candidates for development, and discounted sites. To be a realistic candidate for development, sites are

Issue	Guildford Borough Council Response
the Crown and County Courts should be considered for mixed housing, car parking, cafes and visual amenity.	assessed against criteria set out in the NPPG, which includes consideration of the availability and deliverability of land. Many town centre car parks are constrained by high flood risk.
Universities need to use the land already allocated to them to develop	The University of Surrey continues to develop the Manor Park campus to meet its needs, and land at the University of Law is proposed to be inset from the Green Belt on to provide student accommodation.
<p>Wisley Airfield:</p> <ul style="list-style-type: none"> • Object to building at Wisley Airfield • Support building on Wisley Airfield • More land needs to be acquired at Wisley Airfield to build a sustainable community • Wisley in an SNCI • Wisley makes sense although key traffic improvements necessary • Wisley Airfield is an unsustainable location 	Comments noted. Response provided in the table for specific sites.
<p>Site specific comments:</p> <p>Policy 17/18 - Impact on infrastructure</p> <p>Policy 15 - Need to diversify town centres</p> <p>Site 59 – Object</p> <ul style="list-style-type: none"> • In 1984 it was deemed a four way intersection would be required to cope with 1500 homes. The proposal for a southbound intersection only in inadequate • The comments ‘upgrade water and sewage if needed’ show a lack of understanding of the situation • The assessment of GBCS parcel C1 is incorrect <ul style="list-style-type: none"> ○ Part of the site if common land, you would not have to leave the site to access common land ○ The site is scored on a visit to the local farm, which has been closed for up to six years <p>Site 60 - Views across the Hogs Back are not protected and should be</p> <ul style="list-style-type: none"> - impact on the landscape - Blackwell Farm is too big - Blackwell Farm not a suitable loss of green belt - It will destroy views into and out of the AONB - It will increase traffic on the Farnham road, already heavy - Loss of grade 2 and 3 agricultural land - Loss of land needed for food production in the face of climate change - Loss of habitat for rare plants and protected animals 	Site specific comments addressed in the table for site allocations.

Issue	Guildford Borough Council Response
<p>- It would place a strain on infrastructure and services</p> <p>- The evidence described is as an urban extension, but it would be urban sprawl due to the low density of development around manor park</p> <p>Site 69 - No need for secondary school at Effingham</p> <p>SHLAA site 502/Ripley</p> <p>SHLAA site 502 – Ripley, should be included within the Ripley settlement boundary</p> <p>Site 68 - Chilworth is ribbon development and the plan exacerbates that</p> <p>- Concerns about traffic congestion associated with development and how access will be obtained to new Tyting Farm development.</p> <p>Walnut tree close should be developed for housing to negate the need for green belt develop</p> <p>Site 69 - Effingham site contributes to biodiversity and wildlife</p> <p>- Object to Site 69 as contrary to Para 80 and 85 of NPPF</p> <p>Site 74 (Burnt Common) does not meet the requirements of the NPPF (3 strands)</p> <p>Site 75 (Tannery Lane, Send) was not landfill, it was a pollution belt to protect the house</p> <p>The open area south of King’s Road in Shalford should be designated Local Green Space (behind the bowls club)</p> <p>The DLP states the Howard of Effingham will provide 45% affordable housing. The last figure cited by the developers is 25%.</p> <p>Site 118</p> <p>The schools around Fairlands are already oversubscribed. Proposals to enlarge two schools will only meet the current need, not the need brought by development.</p> <p>Traffic into and out of Fairlands is already heavy and can lead to gridlock</p> <p>Nuthill Farm site should be identified for housing</p> <p>Walnut Tree Close. This is a key area for redevelopment. It has been suggested a separate master plan may be needed. The emphasis should be on housing people and not accommodating light industry and commercial activity.</p> <p>Build quality high density housing alongside Walnut tree Close and Woodbridge</p>	
<p>Green belt sites:</p> <ul style="list-style-type: none"> • Support Sir Paul Beresford’s response • Support land south and east of Tongham potentially to be re-designated as new Green Belt 	<p>Comments noted.</p>
<p>SANG sites:</p> <ul style="list-style-type: none"> • Object to proposed SANG for Tyting Farm 	<p>These comments are addressed under the SANG section</p>

Issue	Guildford Borough Council Response
<ul style="list-style-type: none"> Some sites designated as SANG sites are already designated common land with public access - not additional avoidance sites Include land at Foreman Road, Ash for development - subject to a Grampian Condition relating to the provision of a 'SANG' 'SANGS' are urgently required within the Ash and Tongham area - Council need to work with developers. Land owners and Natural England to ensure the 'SANG' is delivered Support Site Allocations for SANG 106-117 Unclear how the SANGS Policy will work – will not provide effective substitute of green belt Include land at Poyle Road, Tongham for development - subject to a Grampian Condition relating to the provision of a 'SANG' Support site 107 Benswood SANG Absence of a SANG policy 	<p>The Council is working to deliver SANG in areas that do not currently have SANG mitigation. The Local Plan proposes sufficient SANG in suitable places to mitigate development proposals.</p> <p>SANGs do not provide an alternative to the Green Belt. The role of SANG is set out in the Infrastructure Delivery Plan that accompanies the Proposed Submission Local Plan.</p> <p>The proposed site allocations are supported by sufficient SANG. Sites currently with Grampian conditions relating to SANG are counted in the LAA within the outstanding capacity, rather than as a site allocation.</p> <p>The Proposed Submission Local Plan includes policy P5 which deals with the SPA and SANG.</p>
Object to turning University of Law's land into Brownfield - AONB	The land in question is currently used as a car park area and is considered to be previously developed land/brownfield land.
The open area south of King's Road in Shalford should be designated Local Green Space (behind the bowls club)	This comment is addressed in the comments against Policy 19.
Central government must be lobbied to review planning future development for England as a whole	We need to prepare a local plan in line with current legislation, regulations and national policy.
Adding links for development at Gosden Hill, Slyfield and Wisley will require upgrade/ widening to the existing carriageways.	The schemes that we consider are necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'. This includes the schemes SRN2, SRN3 and SRN5 on the A3 and M25 from the Government's Road Investment Strategy (December 2014/March 2015). There are also schemes related to the proposed developments listed.
South East has become too expensive – future growth centres should be in the Midlands and the North	National policy requires that we assess and seek to meet the full need identified across the housing market area. Other parts of the country will have their own needs that they must try and meet.
<p>Transport:</p> <ul style="list-style-type: none"> Should be a transport plan / Transport Strategy for Guildford. Divert cross-town traffic to enable the conversion of Bridge Street and Onslow Street into avenues of shared space New dedicated cycle routes such as the A3 crossing at the Wooden Bridge Better safeguarding for Sustainable Movement Corridor Consider driverless flexible vehicle services for the Sustainable Movement Corridor Need to consider disabled residents in regard to public transport, footpaths 	<p>Guildford Borough Council works closely with the key transport infrastructure and service providers.</p> <p>Since 2014, Guildford Borough Council has undertaken and commissioned further study work and produced and is producing new transport evidence base including a new Local Plan strategic transport assessment, the Guildford Borough Transport Strategy (April 2016) and a Transport Topic Paper.</p> <p>The Guildford Borough Transport Strategy and the transport sections of the</p>

Issue	Guildford Borough Council Response
<p>etc.</p> <ul style="list-style-type: none"> • We are a car culture, use of cars won't change – to change the mindset needs subsidies for local public transport • Roads are too narrow • Taxi area at Guildford station must be addressed • Impact on road infrastructure/ narrow roads • Impact on congestion – A3 slip roads • Insufficient parking available • Public transport is inadequate • Bus station site is the best one for its function and a single integrated location - allows easy interchange • A ring road would be very useful • Train station at Park-Barn/Westborough • No consideration for introducing a high level mass transit system connecting the town centre with the park and ride locations, the University, Hospital and Research Park. An electrical mass transit system using green energy would be a fitting proposal for the twenty first century and in keeping with the work by SSTL • A good bus interchange with comfortable waiting facilities, centrally located and a corresponding integrated bus routing plan • Consider a ring-road as well as Park and Ride to remove through traffic from town • Address the gyratory • Need for another road bridge over the railway/canal • Improve public transport • Improve cycle routes • Scheme needed for A3 –capacity issues, tunnel, better junctions • Unblock the pedestrian underpass at Debenhams • 20mph speed limit zones should be widespread – encourage cycling • Object to the development of a parking facility on Effingham Common • Lowering the prices of bus journeys - creating more frequent and environmentally friendly bus journeys • Do not want other developments to end up like Onslow Park and Ride – poor development, no waiting room built even though it was promised • Car parks should be centralised and serve a number of organisations in the locality • Infrastructure needs more investment • Significant elements of this plan, such as improvements to the A3, are not under GBC's control 	<p>Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'. Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Transport Strategy and IDP may therefore be updated to include these.</p> <p>As planning applications are considered for the sites identified in the new Local Plan, additional transport schemes to address site access and other localised issues may be secured.</p> <p>In the 'Proposed Submission Local Plan: strategy and sites' itself, we do not consider that it is necessary to show the route of the Sustainable Movement Corridor where it uses land within the highway boundary of adopted local roads, land through the campuses of the University of Surrey, or is reflected in site allocation policies, as it now is in policies A5, A7, A16, A24, A25 and A26 of the Proposed Submission Local Plan. Therefore, the only site allocation policy which includes a map indicating the route of the Sustainable Movement Corridor is Policy A10 Land for Sustainable Movement Corridor Town Centre Phase 2, off Walnut Tree Close, Guildford, which effectively replaces site allocation policy 122 from the 2014 version of the Draft Local Plan.</p> <p>The site allocation in the 'Proposed Submission Local Plan: strategy and sites' requires that "Bus interchange facilities presently provided at Guildford bus station on the site are to be provided in a suitable alternative arrangement to be located either partly or wholly on or off site" and that "If alternative arrangement involves on-street provision of bus stops and waiting facilities within the town centre, consideration is required of interactions with other uses such as North Street market, vehicular access and parking, movement and crossings for pedestrians, and the quality, character and setting of the town centre environment".</p> <p>New Guildford town centre bus facilities is scheme BT2 in Appendix C Infrastructure Schedule.</p> <p>Please also refer to the table for the Appendix B Infrastructure Schedule.</p>

Issue	Guildford Borough Council Response
Mathematical Modelling and Critical Path Analysis is needed in the development of the Borough into 2031	Comment noted.
Increasing the volume of enterprise in the borough will put additional pressure on housing	The Employment Land Needs Assessment (ELNA) assesses our employment need across the borough which the Proposed Submission Local Plan is seeking to meet. The NPPF states that we need to meet needs and align our housing and employment strategies. The SHMA includes an uplift for economic factors to ensure that we balance our housing and employment growth and to deliver sustainable development.
Taxation is the last thing which should be applied to the nation. One Tier taxation is needed	This is not a planning policy matter.
Details about consultation should have been sent to all residents	Details about the consultation were included within issues of 'About Guildford', which is delivered to all households within the borough.
A meaningful plan should consider building communities that have everything within walking distance.	As part of assessing reasonable alternative spatial and site options through the Sustainability Appraisal process, we have considered minimising journey lengths and encouraging sustainable transport modes. However this needs to be considered alongside other sustainability factors.
Stronger adherence to the Vehicle Parking Standards Supplementary Planning Document	As stated in the Reasoned Justification for Policy I3 Sustainable transport for new developments, the Council proposes to bring forward a new Vehicle Parking Standards Supplementary Planning Document to provide advice further to the policy with respect to the appropriate provision of off-street vehicle parking. Our policy takes account of the March 2015 written statement to Parliament from the Minister which stated that "Local Planning Authorities should only impose local parking standards for residential and non-residential development where there is a clear and compelling justification that it is necessary to manage their local road network."
Local Plan needs a detailed and comprehensive traffic study	Since 2014, Guildford Borough Council has undertaken and commissioned further study work and produced and is producing new transport evidence base including a new Local Plan strategic transport assessment, the Guildford Borough Transport Strategy (April 2016) and a Transport Topic Paper.
Believe that by populating these areas under the Guildford Plan could constitute Sexual Discrimination! An increase of houses will expand the professional recruitment pool for employers! This will force people to travel on congested roads, further with extended journey times. These factors will force women to take lower grade roles or give up work because the commitment to childcare will make work an impossibility!	Comment noted.
Town centre vision appears to do away with the Friary Centre in favour of the North Street development - difficult to see how this will benefit the town	Misinterpreted, as the Friary Centre would remain.
Build tower blocks of flats in the town centre	We are looking to allocate several sites in the town centre for more housing

Issue	Guildford Borough Council Response
The Plan should promote higher density in existing urban areas through redevelopment, especially in Guildford Town Centre	
Policy 15 - Expansion of town centre is unnecessary	Agree, we are proposing to reduce the town centre area from that designated in the 2003 Local Plan
The draft Guildford town centre vision document should not form part of the evidence base.	It is relevant to consideration of town centre issues
Send Floods	Comment noted.
There is no flooding policy a flooding policy is needed	The new iteration of the plan, the 'Proposed Submission Local Plan strategy and sites' includes a policy on Flooding, Policy P4: Flood Risk.
Question of flooding is a paramount issue. Attention should be given to the views of the National Trust as to building heights so that access to the river by footpath is encouraged and the views across to the Cathedral are kept open.	The Proposed Submission Local Plan contains policy D3: Historic Environment and policy D1: Making better places which will be used to ensure that new buildings are of an appropriate height for their location.

16. Comments provided via Youth Questionnaire

Question and summary of responses	Guildford Borough Council response
<p>Would you add anything to Guildford?</p> <p>No Yes</p> <p><u>Transport</u></p> <p>Things we need - cycle lanes, a 'Boris bike' scheme, a new road to relieve traffic, a tram network, train station, an 'Oyster cards' travel card scheme</p> <p>Things we need to change/improve - cheaper bus fares, better bus services and transport connections, more car park spaces, traffic needs sorting, new bus station</p> <p>Other comments - If we had a congestion charge people round here would just pay (so it wouldn't be effective)</p> <p><u>Infrastructure</u></p> <p>Better mobile connections, better internet/wifi, fix the things that are falling apart rather than building new things, fix pot holes</p>	<p><u>Transport</u></p> <p>The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'.</p> <p>Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Guildford Borough Transport Strategy and IDP may therefore be updated to include these.</p> <p>As planning applications are considered for the sites identified in the new Local Plan, additional transport schemes to address site access and other localised issues may be secured.</p> <p>The Local Plan is about planning to meet the development needs of the future, which may include improving existing infrastructure, although we can only use pooled developer contributions (through the CIL) where new development would worsen</p>

Question and summary of responses	Guildford Borough Council response
<p><u>Facilities/services</u></p> <p>Things we need - theme park, go kart track, better shops for non-mainstream people, 4G sports pitches, Zara for the high street, more restaurants, sit down KFC, indoor ski slope, small leisure centre in town, places to sit for free, bring back laserquest, legal graffiti zone, Forever 21 (shop), Outdoor gyms, a monument, a water park, an outdoor cinema, outdoor paintball, Legoland, free sports such as ping pong</p> <p>Things we need to change/improve - better youth facilities, more events for teens, more sports opportunities (better advertised), more toilets, more bins, Bigger/more skateparks</p> <p><u>Housing</u></p> <p>Houses for those who need them, make housing cheaper, no more zoning-housing to be condensed, more housing, nice high rise buildings like Woking</p> <p><u>Employment</u></p> <p>Better employment opportunities, a workshop where makers can gain access to tools at a monthly fee</p> <p><u>Environment</u></p> <p>An oak tree, more green areas</p> <p><u>Other</u></p> <p>Pedestrianise North Street</p> <p>price of things not to go up too quickly</p> <p>Robots that give out money</p>	<p>this.</p> <p><u>Facilities/services</u></p> <p>The 'Proposed Submission Local Plan: strategy and sites' includes provision for new shops, leisure and entertainment facilities</p> <p>The 'Proposed Submission Local Plan: strategy and sites' aims for approximately 40% of new homes to be affordable.</p> <p><u>Employment</u></p> <p>The 'Proposed Submission Local Plan: strategy and sites' seeks to meet the identified need for an additional 3,200 B class jobs over the plan period to 2033 by providing enough additional sites and floorspace. This will encourage existing businesses to stay in the borough and encourage new ones to move to the borough. This will provide better employment opportunities.</p> <p>The suggestion to provide a workshop where makers can gain access to tools at a monthly fee has been passed to our Economic Development team because it is beyond the scope of the Local Plan.</p> <p>Planting an oak tree (we assume this means a prominent Oak tree as an urban feature) is unlikely to need planning permission so does not need support from the Local Plan. We have passed this suggestion onto the Council's Parks and Countryside team.</p> <p>Policy I4 protects public open spaces in line with the NPPF. The Council is currently completing an Open Space Sports and Recreation study which will identify areas of open space deficit. This will inform delivery of new open space. Policy I4 will be followed by a Green Infrastructure SPD which will set out an approach to Green Infrastructure within urban areas.</p> <p>Part of North Street could be pedestrianised alongside the big redevelopment site at the bottom of North Street</p> <p>Controlling the price of consumer goods is considered outside the remit of planning policy.</p> <p>The borough's settlements already have a number of ATMs which could be considered money dispensing robots.</p>

Question and summary of responses	Guildford Borough Council response
<p>Any other comments on the Vision?</p> <p><u>Things we need</u></p> <p>Better cycling facilities, more benches in the high street, more designer shops</p> <p><u>Things we should change</u></p> <p>Cheaper method to get to Ash, cheaper transport to study places, subsidies for buses for teens, relocate North Street market to somewhere quieter</p> <p><u>Comments on the approach</u></p> <p>Preservation of open spaces is as important as building new homes, preserve green areas, keep areas separate, houses should be spread out, new things to be in keeping, buildings should be eco-friendly, keep things environmentally friendly, may become too overcrowded, make sure infrastructure exists, no more hotels, make sure people can afford houses so poverty is cancelled out, build on golf courses, don't build in Send, build on brownfield first</p> <p><u>Other comments</u></p> <p>Everybody should be supported and listened to, I am too young to be allowed to send in a letter regarding Send, what is strong infrastructure?, stop putting skate stoppers on all ledges</p>	<p>The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'.</p> <p>Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Guildford Borough Transport Strategy and IDP may therefore be updated to include these.</p> <p>As planning applications are considered for the sites identified in the new Local Plan, additional transport schemes to address site access and other localised issues may be secured.</p> <p>We can control the size of new shops but not which shops occupy them</p> <p>The North Street Market is historic, and has been running for 100 years</p> <p>By carefully reviewing our Green Belt boundaries, making appropriate amendments to meet identified development needs, and having an up to date Local Plan in place, the Proposed Submission Local Plan: strategy and sites is giving greater protection to countryside and open spaces, by protecting this land from speculative inappropriate development.</p> <p>Policy D2 of the 'Proposed Submission Local Plan: strategy and sites' requires developments to deliver sustainable design, construction and energy. Policy I4 requires development to be done in a manner that supports biodiversity.</p> <p>Development must have the supporting infrastructure in place by the time it is first used, or we can consider refusing it permission</p> <p>All comments received during Local Plan consultations are considered. However, if you are under 16 you should ensure you have permission from a parent or guardian before responding as we will need to make your name publicly available.</p> <p>We will pass your comment about skate stoppers onto the relevant Council department for consideration.</p>
<p>Does the approach meet the housing needs of your age group? Do you think we need more homes? If so, where?</p>	<p>Comments noted.</p>

Question and summary of responses	Guildford Borough Council response
<p>Yes</p> <ul style="list-style-type: none"> • don't need anymore • Need more affordable homes • Don't know • Need more but should be built on brownfield first • Need more in town centre • Don't build on green areas • 70% should be up for rent, should be for sale • Need housing for students • If estates are needed, make them attractive • House more than 80% students on campus • We are 16 so have no housing needs • Already too much traffic • Don't want ugly high rise flats 	<p>Using brownfield land is high in our spatial hierarchy, however there is insufficient land within this option to meet our development needs.</p> <p>The 'Proposed Submission Local Plan: strategy and sites' aims for approximately 40% of new homes to be affordable.</p> <p>Policy H1 'Homes for all' provides a clear approach towards student accommodation where we expect 60% of University of Surrey eligible students to have bedspaces on campus. Students have a free choice of where to live.</p> <p>The SHMA 2015 looks at the need for market and affordable housing need, and policy H2 looks at affordable housing in greater detail.</p> <p>Policy D1 Making better places seeks high quality design. Policy I1 addresses infrastructure issues.</p>
<p>What else do you think we need to consider in order to provide housing for young people?</p> <ul style="list-style-type: none"> • Access • Cost • Location • Facilities • Don't know • Food • No more housing • Traffic as more houses means more cars • Reduced bus fares • Close to town centre • Preserves green belt • Expand Park Barn • Efficient use of space • Special area for students so no worry about bothering neighbours • Low budget but nice 	<p>Comments noted. The Land Availability Assessment assesses sites against the criteria set out in the NPPG.</p>
<p>Any other comment on housing?</p> <p><u>Strategy</u></p> <ul style="list-style-type: none"> • Don't build on the Green Belt • Don't demolish any current buildings to make way for these homes 	<p>We need to consider whether there are exceptional circumstances that justify amending Green Belt boundaries. We will need to demonstrate at examination that our Local Plan is sound and has sought to, where sustainable to do so, meet identified needs. Brownfield is higher in our spatial hierarchy, however there is insufficient land within this option to meet our needs.</p> <p>The 'Proposed Submission Local Plan: strategy and sites' aims for approximately</p>

Question and summary of responses	Guildford Borough Council response
<ul style="list-style-type: none"> • Build on brownfield • Smaller houses near secondary schools, to reduce traffic <p><u>Cost</u></p> <ul style="list-style-type: none"> • Don't inflate prices • Should be affordable <p><u>Design</u></p> <ul style="list-style-type: none"> • Don't build ugly buildings • Specialist housing is a good idea • Some luxury housing in town centre • Don't overcrowd <p><u>Other</u></p> <ul style="list-style-type: none"> • Build environmentally friendly schools 	<p>40% of new homes to be affordable.</p> <p>There are four design policies in the 'Proposed Submission Local Plan: strategy and sites'. Development proposals will need to be considered against these proposals.</p> <p>All new schools must be academies or free schools.</p>
<p>Do you feel that this policy will encourage walking and cycling (Yes/No)?</p> <ul style="list-style-type: none"> • Still too dangerous • Would get a train which you don't pay for instead of walking • Not if new trains and buses are proposed • People will still drive if they need to • Will encourage use of public transport more • Need more bike shops to advertise cycling • Most people walk anyway • What is being done to encourage walking? • If people wanted to walk/cycle they already would • Park and ride on Gosden Hill isn't a good idea • Parking bikes is an issue/ width of lanes • Should be a park and ride closer to town 	<p>The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'.</p> <p>Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Guildford Borough Transport Strategy and IDP may therefore be updated to include these.</p> <p>As planning applications are considered for the sites identified in the new Local Plan, additional transport schemes to address site access and other localised issues may be secured.</p>
<p>What else can we do to reduce traffic congestion?</p> <p><u>Sustainable transport</u></p> <p>More public transport, make trains and buses cheaper, more cycle routes, improve bus station, buy some old routemasters as they are easy to hop on and off, better park and ride, 'Boris Bikes' bike scheme, have shuttle buses</p>	<p>The National Planning Policy Framework states that "Transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. Smarter use of technologies can reduce the need to travel. The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel. However, the Government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport</p>

Question and summary of responses	Guildford Borough Council response
<p><u>Traffic management</u></p> <p>Ban cars, get builders to finish their work and not block roads with tools, encourage car share, fewer traffic lights, change sync, increase petrol prices, introduce congestion charge, encourage smaller cars, encourage people to drive less, advertise alternative routes, have time restrictions for car use, reduce speed limits, more traffic lights to control</p> <p><u>Transport Infrastructure</u></p> <p>Make the roads wider, more roads/ improve roads, less road works, new bypass for the A3 between Burpham and the Cathedral, sort out one way system, sort A3, more roundabouts</p> <p><u>Other</u></p> <p>Don't build new houses, spread out house building, make houses near train stations, cant reduce traffic, traffic congestion isn't really a big problem, don't allow on road parking, delete cars or copy and paste roads</p>	<p>solutions will vary from urban to rural areas.” (paragraph 29).</p> <p>The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'. Several schemes are relevant to the suggestions made including SRN1, SRN2 and SRN4.</p> <p>Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Guildford Borough Transport Strategy and IDP may therefore be updated to include these.</p> <p>As planning applications are considered for the sites identified in the new Local Plan, additional transport schemes to address site access and other localised issues may be secured.</p> <p>Policy I3 Sustainable transport for new developments is relevant to the suggestion on parking.</p> <p>National Policy requires the local plan to “significantly boost the supply of housing”. Land for building is finite so in order to deliver sustainable development sites need to be optimised, which means tending towards building in higher densities. The Council agrees that sustainable locations for growth include areas near stations and other transport hubs and consider this when selecting sites.</p>
<p>Any other comments on transport?</p> <ul style="list-style-type: none"> • Make cheaper • Improve cycle lanes • Improve buses • No need for more stations • Less speed bumps • Improve buses • Rentable bikes • Buses to Woking should be much easier • Boxgrove roundabout is rubbish • Rail station at Mellow will be useful • Buses are cheap and cycling is safe 	<p>The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'. Many schemes are relevant to the suggestions made.</p> <p>Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Guildford Borough Transport Strategy and IDP may therefore be updated to include these.</p> <p>As planning applications are considered for the sites identified in the new Local Plan,</p>

Question and summary of responses	Guildford Borough Council response
<ul style="list-style-type: none"> • Introduce trams rather than new train stations • Ecofriendly buses • Cycle lock ups • Having a train station in Park Barn will increase the amount of travellers • Oyster cards • Fewer pot holes 	<p>additional transport schemes to address site access and other localised issues may be secured.</p> <p>Policy I3 Sustainable transport for new developments is relevant to the suggestion on parking.</p>
<p>Do you feel that this policy meets the needs of your age group (Yes/No)? If not, please explain.</p> <p><u>Transport</u></p> <ul style="list-style-type: none"> • More cycling routes <p><u>Services/ facilities</u></p> <ul style="list-style-type: none"> • More art opportunities needed • Football pitch would be great • Outgrown spectrum but too young for pubs <p><u>Environment</u></p> <ul style="list-style-type: none"> • Want more green space not houses • I can be happy without a field to run around in • Need more sheltered spaces • Clean lakes and rivers so people can swim <p><u>Other</u></p> <ul style="list-style-type: none"> • Using the town for things other than shopping is stupid • Good for teenagers will give them something to do • Good to encourage other activities, not just shopping • Safety is the most important thing for young people • Town is already too busy 	<p>The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'. Relevant schemes to the suggestions made include AM1, AM2, AM4, AM5, SMC1, SMC2, SMC3, SMC4, SMC5, SMC6 and LRN1.</p> <p>We are not able to find a site within the town centre for a new football pitch</p> <p>Please see above regarding protection for open spaces, the Open Space Sports and Recreation study and the Green Infrastructure SPD.</p> <p>Support for sheltered spaces is noted. This would be consistent with the NPPF which requires suitable adaptation to climate change. This will be set out through the Sustainable Design Construction and Energy SPD and the Green Infrastructure SPD.</p> <p>Policy I4 aligns the Local Plan with the EU Water Framework Directive which calls for significant improvements in water quality in lakes and rivers.</p> <p>We also need restaurants and cafes, and other leisure uses, such as cinemas in the town centre. We will try to create new squares and spaces for people to relaxing and meet up.</p>
<p>What else would you like to see in public spaces?</p> <p><u>Environment</u></p> <ul style="list-style-type: none"> • Greenery 	<p>The 'Proposed Submission Local Plan: strategy and sites' Policy I4 protects open spaces of public value within urban areas. The Council will produce a Green and Blue Infrastructure SPD which will set out the Council's approach to Green Infrastructure within urban areas. Much of this will deal with public spaces.</p> <p>We will try to create new squares and spaces for people to relaxing and meet up.</p>

Question and summary of responses	Guildford Borough Council response
<p><u>Facilities/Services</u></p> <ul style="list-style-type: none"> • Sports facilities, exciting playspaces • Childrens activities • Cleanliness/ more bins • Places to sit • More skateparks • Places for young people • Ping Pong, Laser quest, volleyball • Cheap leisure activities <p><u>Transport</u></p> <ul style="list-style-type: none"> • Trams • More cycle things • Parking <p><u>Other</u></p> <ul style="list-style-type: none"> • High fines for dog littering • Public toilets • Free water fountains • More art 	<p>The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'. Relevant schemes to the suggestions made include AM1, AM2, AM4, AM5, SMC1, SMC2, SMC3, SMC4, SMC5, SMC6 and LRN1.</p> <p>Dog litter, public toilets and water fountains are not generally a matter for planning policy. Public art may be provided as part of new significant developments.</p>
<p>What else would you like to see in leisure facilities?</p> <ul style="list-style-type: none"> • More clubs • More vending machines • Better paid lifeguards • Better toilets • Clubs with places • Squash courts • More changing rooms • Roller skating • Varied activities such as bow and arrow • More music and arts, smaller gigs • Cleaner facilities/ better maintained • More modern • Laserquest and paintball • Football pitch • Gym • Skateparks 	<p>Some of these uses are suitable for town centres and we can try to accommodate them where possible.</p>

Question and summary of responses	Guildford Borough Council response
<ul style="list-style-type: none"> • Cheaper deals • Leisure facilities are good as they are • More martial arts • More sports for girls • More variety of sports • Spa • Tennis courts • Legoland • Indoor ski-slope • Facilities open to a range of abilities • More cycle paths and running routes • Better transport links • More swimming and diving opportunities • Fewer fast food outlets which cancel out exercise • More slides at the spectrum • Bigger gyms • Parkour facilities • Classes for under 16s • Make leisure opportunities free • Fewer skate stoppers 	
<p>Any other comment on public realm and leisure facilities?</p> <ul style="list-style-type: none"> • Spectrum needs upgrading • Improve facilities • More clubs • More green spaces • Make sure it is cheap • Stop people being intimidating in public • Sports club borough wide • More cycling things • Behind Yvonne Arnaud should be made safer so can be a meeting point • Improve existing rather than add more • New town centre laserquest • Should focus on families rather than young people • Help Craggy Island to expand • Spectrum is great • Make Lido cheaper • Cheaper 	<p>We will aim to improve town centre leisure facilities, including the cinema and restaurants.</p>

Question and summary of responses	Guildford Borough Council response
<p>What is your experience of employment / unemployment in Guildford? How can this policy help to improve employment in your area?</p> <ul style="list-style-type: none"> • There are no problems with unemployment • Difficult for those under 20 • I don't have any experience • Open more businesses that would provide youth-friendly employment • Recruiters look for too many qualifications • Need more jobs • Need more jobs if going to add housing too • Hard to find a part time job • Companies should employ locals and younger people • More shops should mean more jobs, so that is good • Encourage jobs for first time workers • Hard to find jobs that are accessible by public transport • Should expand different industries to create a variety of jobs • Employers need people during school time so makes it hard 	<p><u>Employment</u></p> <p>The 'Proposed Submission Local Plan: strategy and sites' seeks to meet the identified need for an additional 3,200 B class jobs over the plan period to 2033 by providing enough additional sites and floorspace. This will encourage existing businesses to stay in the borough and encourage new ones to move to the borough. This will provide better employment opportunities for people of all ages.</p>
<p>Do you feel that the kind of jobs created will be suited to your age group (Y/N)?</p> <ul style="list-style-type: none"> • Not all of them/ sort of/ maybe/ not for me personally • Need a wider variety of jobs • Young people don't want/ have relevant experience to work in industrial places • Young people want jobs in retail rather than offices which will be met by the jobs created – suitable whilst in education • Jobs are helpful for young people before they go to University • Young people need jobs that will kick-start their careers • Need to consider different groups within young people • Yes, but that isn't enough reason for the jobs to be created • It depends on employment age • Part time jobs for young people to fit around their education • The jobs will be taken by older aged people • Young people should focus on education instead of finding a job • Part time jobs needed to allow young people to gain work experience • Leisure jobs may require more training and experience that young people don't have • Scientific and laboratory based careers needed locally – beneficial to young 	<p><u>Employment</u></p> <p>The 'Proposed Submission Local Plan: strategy and sites' seeks to meet the identified need for an additional 3,200 B class jobs over the plan period to 2033 by providing enough additional sites and floorspace. This will encourage existing businesses to stay in the borough and encourage new ones to move to the borough. This will provide better employment opportunities for people of all ages.</p> <p>The land allocated for a 10/11ha extension to Surrey Research Park should provide around 35,000 sq m of new floorspace over the plan period. This should provide opportunities for scientific and laboratory bases careers.</p>

Question and summary of responses	Guildford Borough Council response
<ul style="list-style-type: none"> • Need more jobs working with disability – valuable work experience • Make sure all unused shops are filled before building new ones • Bring higher level, higher paid jobs – would improve Guildford, those earning would spend more money in Guildford – improve economy • Jobs created are simple – no jobs to gain experience in academic industries (medical, law) • Will be of little help to young people and they are still in school by law • Don't know enough about the jobs being created 	
<p>Any other comment on economy and employment?</p> <ul style="list-style-type: none"> • Raise minimum wage • More important to find ways to employ professional people • Don't try and improve the economy too fast – rebuild it • Employers should not be biased • Less budget/pound shops • More effort to help younger people just out of school and university to find jobs – employers want experience but are not willing to give us experience themselves • Need more job opportunities • More shops near North Street – will enable young people to get jobs • Employment in Guildford is good – no need for any policy change • Provide higher level/paid jobs – will boost the economy as money earned will be spent in Guildford • Guildford is not a major tourist destination • Don't build houses on Green Belt - people can commute • Economy must be improved in a way that benefits all 	<p><u>Employment</u></p> <p>The 'Proposed Submission Local Plan: strategy and sites' seeks to meet the identified need for an additional 3,200 B class jobs over the plan period to 2033 by providing enough additional sites and floorspace. This will encourage existing businesses to stay in the borough and encourage new ones to move to the borough. This will provide better employment opportunities for people of all ages.</p> <p>Raising the minimum wage is beyond the scope of the new Local Plan.</p>
<p>Do you feel this Policy will meet the needs of the Travelling community (Gypsies and travellers and travelling showpeople) (Y/N)?</p> <ul style="list-style-type: none"> • Don't Know • Do not provide sites on green belt • Depends where in Guildford Sites are situated • Specific sites are good • Don't feel this policy is necessary - No need for more traveller sites to be built • Policy has the capacity to meet the needs of the community, however it may not work • Sites should not be in town centre • Sites should be well maintained and high quality 	<p>The NPPF says, "To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community" (page 13). The Traveller Accommodation Assessment identifies a need for Traveller accommodation during the plan period.</p> <p>The 'Proposed Submission Local Plan: strategy and sites' proposes to amend Green Belt boundaries to meet the need for housing (C3), employment land, and traveller accommodation.</p>

Question and summary of responses	Guildford Borough Council response
<p>Any other comments on Travellers' sites?</p> <ul style="list-style-type: none"> • Specific sites are better as it stops • Should make sites small and across the whole borough • Traveller sites can be loud • No sites on Green Belt land • Policy might have a negative impact on local community/ residents • No need for sites to be near schools or doctors as they are always travelling • If we cater for travellers needs there might be less disruption • Need to think more about the residents of Guildford • Sites shouldn't be in the town centre • Sites should be in already developed communities – not rural spaces • Sites should not be in large residential areas – should be in rural places • No more traveller sites are needed in Guildford 	<p>Comments addressed in the table Planning for Sites.</p>
<p>Are there any other sustainability issues this policy should cover (Y/N)? (please explain your answer)</p> <p><u>Energy</u></p> <ul style="list-style-type: none"> • Make fuel in the area more environmentally friendly • More solar panels on houses – solar panels installed on new build houses • Improve infrastructure before encouraging renewable energy • New development should focus on using renewable and cleaner energy sources • Build nuclear reactors – better for environment and carbon zero • Harness man power as an electricity source <p><u>Sustainable construction</u></p> <ul style="list-style-type: none"> • Improve carbon emissions from current buildings before building new ones • Houses built could be cob or passive - use very little materials, energy efficient. • Building regulations stricter so energy is not wasted <p><u>Environment</u></p>	<p>Fuel for transport is not a planning policy issue. Small biofuel plants can be delivered on farms as an appropriate use. Large biofuel power stations and Nuclear plants are likely to fall under the National Significant Infrastructure Regime so are not likely to be an issue for the local plan. Policy D2 supports low and zero carbon energy generation at a number of scales, including solar panels on new dwellings. Human powered electricity generation is not widespread and it is not clear whether these would need planning permission. The Local Plan therefore does not address this.</p> <p>Policy D2 supports energy efficient design and construction. National policy prevents the Local Plan from requiring technical standards for energy efficiency, like Passivhaus. Building regulations are beyond the remit of local planning authorities, except for two optional building regulations that can be adopted through planning policy. These deal with water efficiency and access. Guildford has already adopted the building regulation on water efficiency.</p> <p>Much of the borough is already in agricultural use. New farms would likely not require planning permission. The Sustainability Appraisal considers agricultural land value. Policy P1 of the 'Proposed Submission Local Plan: strategy and sites' aims to protect the Surrey Hills AONB in line with the National Planning Policy Framework. Major development in the AONB will be considered inappropriate unless exceptional circumstances are demonstrated and the development proposal is considered to be in the public's interest.</p> <p>The Guildford Borough Transport Strategy and the transport sections of the</p>

Question and summary of responses	Guildford Borough Council response
<ul style="list-style-type: none"> • Need more local farms supplying food for local supermarkets • Make sure there is enough Green Belt/open spaces • Surrey Hills' hillside, wildlife and AONB must be preserved • Protect North Downs from development <p><u>Transport</u></p> <ul style="list-style-type: none"> • Stop polluting the centre of town by adding more ring roads • More buses for Chilworth/ Albury • More cycling schemes – better cycling facilities • Discourage car use to lower CO2 emissions • Reduce bus fares – young people would use public transport more than cars • Extend the amount of charging points for electric cars <p><u>Other</u></p> <ul style="list-style-type: none"> • Recycling should be more widespread • Pedestrianise more of the town • New development should be in character with existing buildings 	<p>Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'. Relevant schemes to the suggestions made include AM1, AM2, AM4, AM5, SMC1, SMC2, SMC3, SMC4, SMC5, SMC6 and LRN1.</p> <p>We are not proposing a (new) ring road.</p> <p>Policy I3 Sustainable transport for new development is relevant to the suggestions made on electric cars and promoting sustainable transport modes.</p> <p>Recycling behaviour largely depends on individual members of the public and available recycling infrastructure (delivered by Surrey County Council). However, Policy D2 encourages the reduction and re-use of construction waste.</p> <p>Policy D2 will require all new developments to promote and reinforce local distinctiveness and to respond to the exiting context.</p>
<p>Please let us know your ideas to improve sustainability in your area.</p> <p><u>Environment/climate change</u></p> <ul style="list-style-type: none"> • Reduce litter by increasing number of recycling bins around town, introducing fines for littering • More sustainable and renewable energy – solar panels, hydroelectricity • Make people aware of the damage we are creating before showing solutions • Supply houses with rainwater barrels – will cut down hose use • Improve insulation of old houses and ensure new builds are energy efficient • Supply houses with rainwater barrels – will cut down hose use • Solar panels should be a MUST on all new builds • Wind Turbines 	<p>Litter is not generally a matter for planning policy. We have passed your comments on to the relevant team.</p> <p>Policy D2 supports low and zero carbon energy at a range of scales. Education on environmental issues is not generally an issue for planning policy. However, the evidence base includes the Environmental Sustainability and Climate Change study which examines the impact of human behaviour on the environment. The Council has a Climate Change Team which undertakes public education work.</p> <p>Policy D2 supports the retrofitting of existing buildings for improved energy efficiency. Many of these measures do not need planning permission so there is limited scope to address this through the Local Plan.</p> <p>Rainwater harvesting measures are supported but not required by Policy D2 as it is considered that water efficiency measures should be the first step and harvesting should not become a substitute for this.</p> <p>Policy D2 supports renewable energy on new homes and requires all new homes to achieve at least a 10 per cent reduction in carbon emissions through renewable and</p>

Question and summary of responses	Guildford Borough Council response
<p><u>Development</u></p> <ul style="list-style-type: none"> • Keep the Green Belt • Build on Brownfield Sites <p><u>Transport</u></p> <ul style="list-style-type: none"> • Better and cheaper sustainable public transport – will reduce car use • Improve infrastructure – less traffic would improve air quality • Boris Bikes and improving cycling facilities • Promote the use of electric cars <p><u>Other</u></p> <ul style="list-style-type: none"> • Reward people for being sustainable by lowering the price of equipment • Increase agricultural land and farming • Better Wifi across Guildford • Focus more on NHS • Help preserve the historic areas in the community 	<p>low carbon technologies. Requiring solar panels on all new builds is likely to be considered too onerous at examination.</p> <p>The Council's renewable energy mapping study found limited scope for large scale wind in the borough. Small scale turbines at the building scale are supported through policy D2.</p> <p>Policy I3 Sustainable transport for new development is relevant to the suggestions made on electric cars and promoting sustainable transport modes.</p> <p>The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'. Relevant schemes to the suggestions made include AM1, AM2, AM4, AM5, SMC1, SMC2, SMC3, SMC4, SMC5, SMC6 and LRN1.</p> <p>We need to consider whether there are exceptional circumstances that justify amending Green Belt boundaries. We will need to demonstrate at examination that our Local Plan is sound and has sought to, where sustainable to do so, meet identified needs. Brownfield is higher in our spatial hierarchy, however there is insufficient land within this option to meet our needs.</p> <p>The price of consumer items cannot be regulated through planning policy. The 'Proposed Submission Local Plan: strategy and sites' does not include policies supporting the delivery of new farms as there is limited scope for planning policy to affect this.</p> <p>The historic environment is an important part of the character of the borough, policy D3 will ensure that we will conserve the historic environment in a manner appropriate to its significance.</p>
<p>Any other comment on sustainability?</p> <ul style="list-style-type: none"> • Should think about renewable energy sources like the Hydroelectricity plant on the River Wey • Encourage sustainability so future generations have positive attitudes towards eco-friendliness • Do not build houses • Do not change Green Belt boundaries • Do not Build on Green Belt 	<p>The Council operates a small hydro plant on the Wey. Policy D2 supports the delivery of low and zero carbon energy, which would include hydro power.</p> <p>The plan as a whole encourages sustainable development. Behavioural change is largely outside the remit of the Local Plan. The Council has a climate change team that encourages behavioural change in this regard.</p> <p>We consider that there are exceptional circumstances which justify amending Green Belt boundaries. We have used our spatial hierarchy to direct development towards</p>

Question and summary of responses	Guildford Borough Council response
<ul style="list-style-type: none"> • Need better and cheaper public transport • Improve cycling facilities • Build with longer lasting materials e.g. G –Live sculpture rusted 	<p>those areas that are the most sustainable.</p> <p>Policy I3 Sustainable transport for new development is relevant to the suggestions made on promoting sustainable transport modes.</p> <p>The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'. Relevant schemes to the suggestions made include AM1, AM2, AM4, AM5, SMC1, SMC2, SMC3, SMC4, SMC5, SMC6 and LRN1.</p>
<p>Please let us know any other comments you might have about the Local Plan</p> <p><u>Spatial strategy</u></p> <ul style="list-style-type: none"> • Keep it as it is • Don't build on Green Belt – it will destroy our heritage • Building in green areas will impact on wildlife • Safety risk in Send – having more children and more cars • Use Brownfield sites first • Guildford is too busy – develop surrounding areas • Don't build in Send • The Draft LP should be adjusted to suit the people currently living in Guildford • Build upwards instead of across (like Woking) <p><u>Design</u></p> <ul style="list-style-type: none"> • Don't modernise Guildford – will impact on current character <p><u>Housing</u></p> <ul style="list-style-type: none"> • Houses being built should have priority to people who need them and live here • Suitable affordable housing that people on minimum wage can buy <p><u>Facilities/services/infrastructure</u></p>	<p>We consider that there are exceptional circumstances which justify amending Green Belt boundaries. We have used our spatial hierarchy to direct development towards those areas that are the most sustainable.</p> <p>Policy D1 recognises the importance of the current character of the borough and will require all new development to achieve high quality design and enhance the environment in which they are set.</p> <p>The 'Proposed Submission Local Plan: strategy and sites' aims for approximately 40% of new homes to be affordable.</p> <p>We are working with our partners to get infrastructure improvements to ensure we have enough schools, etc</p> <p>The provision of dog waste bins around public open spaces is dealt with by the Council's Parks and Countryside team. We have passed your comment to them.</p> <p>The Council aims to proactively engage with all members of the community during planning policy consultations.</p> <p>Public seating and other street furniture in public places are generally not planning policy matters. We have passed this comment to the relevant teams in the Council and Surrey County Council.</p> <p>Tax is set by central government, except council tax which is set by the Council and precepting authorities (Surrey County Council, police and fire services, civil parishes and others). Council tax rates are not an issue for the Local Plan, but we have</p>

Question and summary of responses	Guildford Borough Council response
<ul style="list-style-type: none"> • Better football pitches • Ensure that there are enough schools for young people to gain and education • More independent and charity shops • Facilities need to enhance Guildford • Build a Laser Quest • Need more gyms • Need more cheap activities for all ages • Improve road infrastructure <p><u>Transport</u></p> <ul style="list-style-type: none"> • No need for train stations in Merrow or Park Barn – discourages walking • Improve cycling facilities – educate cyclists on basic road safety • Need to improve public transport and make it cheaper • New facilities need to be made accessible to everyone in the community • Pedestrianize Guildford <p><u>Other</u></p> <ul style="list-style-type: none"> • Need more dog waste bins around the green spaces • Good idea getting young residents to fill out a questionnaire • Questionnaire should have questions that young people are experienced in • Do not ignore local opinion • Cover the needs of young people as well as adults • Allow young people to express their opinions about the LP • Need more public seating around Guildford – will be good to socialise • Don't tax those who are struggling • Younger residents in Guildford should be encouraged to enjoy historical sites- facilities should be better promoted instead of improved 	<p>passed your comment on to the relevant team. Promoting historical sites is not a role for the Local Plan. We have passed this comment on to the relevant team.</p> <p>The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes. Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'. Relevant schemes to the suggestion on improving road infrastructure are all the SRN and LRN schemes set out.</p>

17. Miscellaneous comments: Mixed policies and sites

Mixed Policies / Sites

Section of Local Plan	Issue	Guildford Borough Council Response
Policy 9	Support for Policy 9 - all development should be appropriate in scale and design, having regard to each settlement's identity, countryside setting and local character and distinctiveness	Comment noted
Policy 2	Housing number is too high, it is not needed to meet local housing needs and is unsustainable without infrastructure needed to support it	The NPPF requires that where sustainable to do so we should meet our objectively assessed housing need. This has been considered as part of the Sustainability Appraisal process.
Appendix C – Evidence Base SHMA	SHMA is supposed to calculate the demand to meet local needs, not to satisfy the demand from London or overseas buyers interested only in property as an investment	This comment has been responded to in the table for Appendix C: Evidence Base
Policy 2	The number of traveller pitches planned is to high	The number of traveller pitches needed within our borough is based on the findings of our Traveller Accommodation Assessment . Some of this need is generated from overcrowded existing pitches.
Site 64	Object to proposed community football ground due to additional traffic generated before/after matches on the Woking Road Should use the University's sports facilities instead	No longer applicable as this site is not included as a site allocation in the Proposed Submission Local Plan.
Policy 18	No substantial road improvements are in the Plan and are indeed difficult to conceive.	Guildford Borough Council works closely with the key transport infrastructure and service providers to plan and support the delivery of appropriate improvements, including Surrey County Council as the Local Transport Authority, the principal bus and community transport operators, South West Trains and Great Western Railway, and Network Rail. The Guildford Borough Transport Strategy and the transport sections of the Infrastructure Delivery Plan (IDP) set out a programme of transport schemes.

Section of Local Plan	Issue	Guildford Borough Council Response
		<p>Improvement schemes will address the critical existing transport issues and mitigate the key transport impacts of planned development. The schemes that are considered necessary for the delivery of the draft Local Plan are written into the plan in the Infrastructure Schedule at Appendix C of the 'Proposed Submission Local Plan: strategy and sites'.</p> <p>Alternative transport schemes may emerge during the plan period which could be preferable to schemes already identified. The Guildford Borough Transport Strategy and IDP may therefore be updated to include these.</p> <p>As planning applications are considered for the sites identified in the new Local Plan, additional transport schemes to address site access and other localised issues may be secured.</p>
Site 93	I support the provision of three permanent pitches being allowed on the site, but object to the number being increased to five as proposed, and I also object to the proposal to remove green belt status from the site. Giving it non greenbelt status opens the door to all manner of unintended consequences.	Comment noted re the additional pitches. These are to accommodate household growth over the plan period. The NPPF and PPTS allows for Green Belt boundaries to be amended in exceptional circumstances when preparing a new Local Plan. We consider that there are exceptional circumstances that justify amending Green Belt boundaries. In the case of traveller accommodation, this will create small insets from the Green Belt.
Policy 19	Roads - This section mentions traffic from SANGS	SANGs have small parking areas of often around 10-40 spaces. It is not anticipated that this will have a significant impact on traffic. Surrey County Council, as the Local Highway Authority, are consulted on new SANG proposals and have an opportunity to comment on the traffic impact during the planning application process.
Policy 9	I am completely opposed to the proposed changes to	This comment has been responded to in the table for

Section of Local Plan	Issue	Guildford Borough Council Response
	the village boundaries of Send and Send Marsh which remove these and further large areas from the green belt.	Policy 9
Site 77	<p>Proposal to put a school on the fields at Cuckoo Farm is West Clandon is an example of how this draft plan has been drawn up under instructions which are driven by a building agenda</p> <p>It is possible that a new access could be obtained by building across fields from Meadowlands, a small cul de sac. The main road through West Clandon (the Street) has several blind points, including the humpback bridge over the railway lines.</p> <p>Levels of traffic will increase danger and cause accidents. Such developments are out of proportion for Guildford's needs and ability to deliver services and infrastructure and should not therefore proceed.</p>	No longer applicable as this site is not included as a site allocation in the Proposed Submission Local Plan. The need to provide new secondary schools over the plan period is being met on other sites.
Policy 10	SCC has stated that they will do everything in their power to protect the Green Belt, and this is the wish of the residents in Worplesdon.	This comment has been responded to in the table for Policy 10
Policy 2	We do not want high-rise dwellings in our historic town (the two existing ones are eyesores from the 60's) or large incursions into the surrounding Green Belt	<p>We consider that there are exceptional circumstances related to our high housing need that justifies amending Green Belt boundaries.</p> <p>The Proposed Submission Local Plan site allocation policies allocate sites for an approximate amount of homes. This is informed by the Land Availability Assessment (LAA) which has considered the individual constraints and planning history of a site. The determination of a planning application considers the development proposal against all relevant planning policies and material planning considerations, including the impact of development on the character of the area.</p>
Policy 2	England is one of the most densely populated countries in Europe, and Surrey is the most densely populated county in the country. Therefore, why is the Council	National policy requires that we assess and seek to meet the full need identified across the housing market area. Other parts of the country will have their owns

Section of Local Plan	Issue	Guildford Borough Council Response
	helping developers to build yet more houses here?	needs that they must try and meet.
Policy 2	Riverside business places should move to Slyfield area to build new houses/shops with pedestrian walks by the river	Under national planning policy, new shops should be located within town centres, or failing that, in edge of centre locations as defined in the local plan, not necessarily along the riverside.

Draft