

Consultation on draft SA Scoping Report for Guildford Local Plan 11 December 2012 to 22 January 2013		
We also received many comments that were not relevant to the sustainability appraisal scoping report. These are presented in a separate table.		
Name	Response	Response
	1. Are there any further policies, plans, programmes or strategies that should be considered in the SA context?	
Gordon Bridger	The most important economic drivers identified in the Guildford Economic Study 2009 were knowledge, science and financial, business and insurance services for over 31% of GVA. Public administration, education and health accounted for another 22%, and manufacturing 10%. What is particularly relevant is that most of these enterprises are not in the town centre, and that town centre retail development which has had such a very high profile in recent development proposals only accounted for around 10% of GVA.	Noted that retail and services make up 15%, this is the third largest employment sector, and is therefore more important than manufacturing. Also noted that retail, distribution etc make up 15%. The 2009 Study also notes that 54 per cent of all jobs in the Borough are concentrated in the three wards of Onslow, Holy Trinity and Friary and St Nicolas.
Natural England, Francesca Barker	Biodiversity - Natural England recommends the inclusion of the following: Natural Environment White Paper: http://www.defra.gov.uk/environment/natural/whitepaper/ The NEWT has a close focus on promoting high quality natural environments, expanding multi-functional green infrastructure networks and initiating landscape-scale action to support ecological networks. The White Paper specifically seeks to: protect core areas of high nature conservation value; promote corridors and „stepping stones“ to enable species to move between key areas.	
Natural England, Francesca Barker	Biodiversity Strategy for England: http://www.defra.gov.uk/publications/2011/08/19/pb13583-biodiversity-strategy-2020/	
Natural England, Francesca Barker	This seeks to halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks with more and better places for nature for the benefit of wildlife and people. Strategy also proposes introduce a new designation for Local Green Areas to enable communities to protect places that are important to them.	
Natural England, Francesca Barker	Making Space Nature: http://archive.defra.gov.uk/environment/biodiversity/documents/201009space-for-nature.pdf	
Natural England, Francesca Barker	A report into the state of England’s wildlife sites, led by Professor John Lawton and published in September 2010, which showed that England’s wildlife sites are fragmented and vulnerable to change. The report makes the following key points for establishing a strong and connected natural environment: that we better protect and manage our designated wildlife sites; that we establish new Ecological Restoration Zones; and that we better protect our non-designated wildlife sites.	
Natural England, Francesca Barker	UK and Surrey Biodiversity Action Plans http://jncc.defra.gov.uk/page-5155 and http://www.surreycc.gov.uk/environment-housing-and-planning/conservation-and-restoration/surrey-urban-biodiversity-project/surrey-biodiversity-action-plan	See comment about including reference to England’s Strategy.
Natural England, Francesca Barker	The UK Biodiversity Action Plan (UK BAP) was published back in 1994, and was the UK Government’s response to the Convention on Biological Diversity (CBD), which the UK signed up to in 1992 in Rio de Janeiro. Action plans for the most threatened species and habitats were set out to aid recovery, and national reports, produced every three- to five-years, showed how the UK BAP was contributing to the UK’s progress towards the significant reduction of biodiversity loss called for by the CBD.	
Natural England, Francesca Barker	Thames Basin Heaths Special Protection Area Avoidance Strategy 2009-2014 http://www.guildford.gov.uk/CHttpHandler.ashx?id=11294&p=0	
Natural England, Francesca Barker	This document forms the basis of planning guidance in relation to new residential development in Guildford and its impact on the SPA.	
Natural England, Francesca Barker	Ancient Woodland is considered to be an “irreplaceable habitat” in the NPPF Paragraph 118, and the NEWP states, “the Government is committed to providing appropriate protection to ancient woodlands and to more restoration of plantations on ancient woodland sites (in recognition of their particular value).” To comply with the NPPF, the council should make reference to the government’s stance on ancient woodland.	Noted and included.
Cllr. Christian Holliday, councillor for Burpham ward	The Local Plan Sustainability report should have specific references to Neighbourhood Plans and the 2012 regulations.	Amended to include NPPF reference. No reference made to the 2012 Regs, as not a policy, plan or programme or sustainability objective.
Downsedge Residents' Association, John Twining, Chairman	We strongly recommend that 'Aspirations for Guildford 2012' by Guildford Residents' Associations be included in the scoping exercise. This document (a copy of which is attached) was originally drafted by the East of Guildford Residents' Associations and subsequently circulated to all identified residents' associations in the Borough of Guildford, an increasing number of which have adopted it. It thus represents the views of vitally important stakeholders in the future of Guildford i.e. the residents of the Borough whose knowledge of, and 'feel' for, Guildford is inevitably greater than that of external consultants, however eminent.. 'Aspirations' is also relevant to the appraisal criteria in question 6 below.	'Aspirations for Guildford 2012' is not a statutory plan nor one produced by the LPA or other legal entity, therefore it is not included.
Surrey County Council, Sue Janota, Spatial Planning Team Manager, Environment & Infrastructure Directorate	We would like to see the Surrey Local Flood Risk Management Strategy included. The Surrey School Organisation Plan has also been revised and the latest version covers the period 2012-2022. Although the Surrey Economic Partnership Strategy still exists, the Partnership itself no longer does and its work is now undertaken by Surrey Connects which has its own Business Plan. see http://www.surreyconnects.com/Resource-Centre/Reports-and-Presentations and http://www.surreyconnects.com/Resource-Centre/Reports-and-Presentations You should also be aware that Surrey’s first Joint Health and Wellbeing Strategy will be published in April 2013.	We have updated the reference to the SOP and added the SC Business Plan. Didn't include the Health and Wellbeing strategy as not yet published.
Effingham Parish Council, Susan Morris, Clerk	A statement in the Scoping Report about school provision in the Borough does not tally with the most recent assessment available from Surrey County Council and there is a material difference. On p17, at 6.2 'What is the baseline? Education the Scoping Report says: 'With respect to secondary schools, there is not likely to be a significant shortfall to 2017. After 2017 additional Secondary places may be required in Guildford, Ash and Effingham.' This is assessment is credited to School Organisation in Surrey (SOIS) published by Surrey County Council April 2012 and covering 2012 – 2021. However, this document is no longer current. On 27 November 2012, Surrey County Council’s Cabinet for Children and Learning considered the report Surrey School Organisation Plan 2012 – 2022, which has superseded SOIS in setting out policies and principles underpinning school organisation in Surrey. This report highlights the likely demand for school places as projected over a 10 year forecast period and sets out the potential changes to provision that may be required in order to meet the statutory duty to provide suitable and sufficient places. This plan is reviewed annually in order to ensure that the best information is used in the planning process and in this case the Cabinet approved recommendation to the Council. For each Borough and District within the Plan primary and secondary provision is discussed. Thus for Guildford Borough, the report to Cabinet states (point 15, page 6): 'In the Secondary sector, the current surplus of places is set to increase until 2013 to around 150 places, then it will reduce and potentially there will be a shortage of Year 7 places by 2019. No action is proposed other than to validate the projections before deciding what changes might be required locally.'	update section referring to Surrey School Organisation Plan 2012-22
Effingham Parish Council, Susan Morris, Clerk	The consequence of the above is that the report published in April 2012 foresees a shortfall of secondary places from 2017 and specifically cites Effingham, but the report published in November 2012 foresees a shortfall of secondary places from 2019 and sees no need to mention any specific location. Therefore, with regard to the Guildford Local Plan Sustainability Scoping Report, the Parish Council’s comment is that the Report should refer to the most recent analysis and explain or resolve the discrepancy before committing to a statement about Effingham.	Section updated to include Sept 2012’s SSOP (considered by SCC’s cabinet 27 Nov 2012) and projections / requirements to reflect this. The report considered by the Cabinet in November 2012 is dated September 2012. Report is on SCC’s website. Please update reference
East Guildford Residents' Association (EGRA), Amanda Mullarkey	We suggest the document is drafted in a way that notes but does not rely on policies in the SE Plan such that if, as is currently proposed, it is formally abolished, this will not undermine the approach or policies in this Guildford document. Worse still, local sustainability aspirations should not be overridden by a SE Plan of limited future life.	
East Guildford Residents' Association (EGRA), Amanda Mullarkey	Far more should be made of the invaluable information in the Landscape Character Assessment and Residential Design Guide which describe assets we are charged with managing and enhancing sustainably	Reference to LCA has been included.
Hampshire County Council, Pete Errington, Strategic Planning Manager, Economy Transport and the Environment	While the SA Scoping Report references the Countryside & Rights of Way Act and the need to create a framework of public access to the countryside (page 65), there is no reference to the Surrey Rights of Way Improvement Plan (ROWIP) . This may be because the ROWIP itself is referenced within the Surrey Local Transport Plan 3.	Surrey ROWIP is referenced within LTP3

Environment Agency, Katie Newton, Planning Officer	Thames Catchment Flood Management Plan (CFMP) (Environment Agency) - CFMPs give an overview of the flood risk across a river catchment. They recommend ways of managing those risks now and over the next 50-100 years. They consider all types of inland flooding, from rivers, ground water, surface water and tidal flooding, but not flooding directly from the sea, (coastal flooding), which is covered in Shoreline Management Plans. CFMPs will be used to help us and our partners plan and agree the most effective way to manage flood risk in the future.	
Environment Agency, Katie Newton, Planning Officer	Guildford Borough Council is covered by the Guildford Policy Unit of the EA. Within this policy unit, the floodplain is seen as our most important asset in managing flood risk. We are seeking to maintain the existing level of conveyance by keeping the existing channels clear and free from obstruction to reduce the impacts from low order flood events (up to approximately 5% AEP).	
Environment Agency, Katie Newton, Planning Officer	Surrey Preliminary Flood Risk Assessment 2011 (PFRA) (Surrey County Council) - Surreys PFRA is national high-level overview of flood risk from local flood sources, including surface water, groundwater, ordinary watercourses and canals in response to the Flood Risk Regulations 2009. The PFRA found there to be considerable risk of flooding from surface water across Surrey, particularly in the north of the County, including Guildford.	
Environment Agency, Katie Newton, Planning Officer	Surrey Local Flood Risk Management Strategy (Draft 2012) - This 2012 document provides an overview of flood risk across Surrey for all sources of flooding, how partners are working together to manage the risk and the ambitions for the county (in their role as LLFA) to 2016. Guildford is identified as one of the boroughs with the highest overall flood risk in Surrey, with over 400 properties at risk of fluvial flooding.	
Environment Agency, Katie Newton, Planning Officer	Guildford Risk Reduction Document - This document supports the Guildford SFRA and sets out a unique approach to the functional floodplain in Guildford urban area. It also forms part of the Guildford Development Framework (GDF) evidence base.	
Environment Agency, Katie Newton, Planning Officer	Biodiversity - The following should also be included:	
	- Wildlife & Countryside Act, 1981 (as amended).	this transposes the Birds Directive, already included
	- Countryside and Rights of Way Act 2000	
	- Water Framework Directive (WFD) 2000, including:	
	- Thames River Basin Management Plan	
	- Wey Catchment Implementation Plan.	
	- Natural Environment & Rural Communities (NERC) Act, 2006, particularly Section 40.	implemented through the NEWP, NPPF, Biodiversity 2020
	- UK Biodiversity Action Plan.	already included
	- Surrey Biodiversity Action Plan.	already included
	- Policy relating to designation of local wildlife sites, known as Sites of Nature Conservation Importance (SNCIs) in Surrey.	already included
Environment Agency, Katie Newton, Planning Officer	Groundwater - We recommend updated Groundwater Protection: Principles and Practice (GP3) by the EA and Water Framework Directive (WFD) 2000 text. These provide the basis for protecting and enhancing water quality (in both surface waters and groundwater) and managing water quantity as a resource, please see our general comments below.	
Burpham Community Association, Liz Critchfield, Secretary	We recommend that "Aspirations for Guildford 2012" be included in the scoping exercise. The document was originally prepared by East Guildford Residents' Associations (EGRA) and circulated to identified residents' associations (RAs) in the Borough. Many RAs have adopted it so it represents the views of a cross section of Guildford residents who know and understand the town.	We have considered the scoping report issues and SA framework in light of this document, and have discussed the details with EGRA representatives.
Burpham Community Association, Liz Critchfield, Secretary	The SA should give due regard to any Neighbourhood Forums within the Borough.	No Neighbourhood Forum in the borough has yet adopted a Neighbourhood Plan, so there are no formal plans to refer to.
HTAG Planning Group, Bob Bromham, Secretary	1.1. It must be made clear that those covered in this document are not exclusive, and that others may be added as the process continues, and as new relevant studies and documents become available. 1.2. Add the Guildford Residents paper "Aspirations for Guildford 2012".	The EGRA document is the views of residents of a selection of Guildford town residents. It does not necessarily reflect the views and priorities of residents of the whole borough. We have taken it into account in revising the SA scoping report, but as a document of aspirations of part of the borough's population, and with no formal status, it would not be suitable to include as a plan, programme or strategy in the SA scoping report.
Abbotswood Residents Association - Central Crescent (ARA-CC), Graham Hibbert	The document supported by 23 residents Associations from across the town, called "Aspirations for Guildford 2012", should be acknowledged in the review as it highlights the areas of concern to many households from across the town. Reference to this document would be one indication of the Local Plan addressing the concerns of residents.	The EGRA document is the views of residents of a selection of Guildford town residents. It does not necessarily reflect the views and priorities of residents of the whole borough. We have taken some of the issues that it raises it into account in revising the SA scoping report. However, as a document of aspirations of part of the borough's population, and with no formal status, it would not be suitable to include as a plan, programme or strategy in the borough's SA scoping report.
Guildford and Waverley Friends of the Earth, Kathy Smyth	Members of the group, which has recognised expertise in renewable energy, were shocked and dismayed by the low level of renewable energy installed to date in the borough as set out in Table 11.3, particularly in relation to commercial installations which total a paltry 0.113MW. The word which immediately springs to mind to describe the current situation is 'pathetic'. The absence of importance given to this area by Guildford is reflected by the failure to identify this as a separate topic area although we note that the Planning Advisory note recommends energy as a topic heading.	We do not have very many installations, but those we do have are of high output. Our output is equivalent to the average for a South East borough. The number will increase when water installations are included.
Jennie Kyte	The Residential Design Guide This is an important document and should be included in the Scoping Report.	This document is too detailed for inclusion in the SA scoping report
Jennie Kyte	Aspirations for Guildford This document by Residents Associations is written by those who know Guildford well and its inclusion would be helpful in shaping the future Guildford.	The EGRA document is the views of residents of a selection of Guildford town residents. It does not necessarily reflect the views and priorities of residents of the whole borough. We have taken it into account in revising the SA scoping report, but as a document of aspirations of part of the borough's population, and with no formal status, it would not be suitable to include as a plan, programme or strategy in the SA scoping report.
Jennie Kyte	The South East Plan The South Plan still has to be taken into consideration and is quoted in the Scoping Report. However, it is to be abolished shortly and perhaps this could be mentioned in the Report as its influence on Guildford policies would then end.	The SA Plan has been revoked, 27/2/13 - (except for two policies) so all references to it have been removed.
English Heritage, Alan Byrne	The Cultural Heritage section (chapter 10) is deficient as it misses a key objective of the National Planning Policy Framework which is that local plans should set out a strategy "for enhancing the built and historic environment" (para 157) and not simply to conserve and protect it. A positive strategy for conserving and enjoying the historic environment is a requirement of the NPPF (para 126) and the irreplaceable nature of heritage assets should be recognised in policy. The thrust of policy should also relate to the totality of the historic environment, i.e. all heritage assets, and not just the selected designated assets. The NPPF is explicit, in particular, in respect of the need to ensure a policy framework for safeguarding as yet unidentified or undesignated archaeological assets. Setting of heritage assets is now accorded as much weight as the assets themselves, as it can be a major part of the significance of them, and a recognition of the need to protect and enhance the context of the asset should be reflected in the local plan and SEA/SA process.	
English Heritage, Alan Byrne	There should be an up-to-date evidence base (NPPF para 168) on which to base policies, otherwise the local plan may be found to be unsound; I would suggest a heritage strategy is prepared in advance of the formulation of local plan policies and SEA/SA that identifies the extent, significances and management requirements of the historic environment of the borough, and the positive contribution it makes to the objectives of sustainable development. Without this essential step it would be difficult to carry out the SEA/SA requirement to rigorously assess the potential scope and severity of impacts arising from policy options in the draft local plan. Para 10.5 of the SA should be amended to reflect this gap in information.	Our Heritage Strategy will be evidence-based and its findings will inform our draft local plan.
Guildford Vision Group, Bill Stokoe	Absence of Masterplan should be noted: We believe that, as a formal document adopted by a number of residents' associations around Guildford, within the Borough, 'Aspirations for Guildford 2012' should be included in the scoping exercise. Furthermore, the absence of a Master Plan for the town centre should be noted in the SA (please see our more detailed comments below at C.).	The EGRA document is the views of residents of a selection of Guildford town residents. It does not necessarily reflect the views and priorities of residents of the whole borough. We have taken it into account in revising the SA scoping report, but as a document of aspirations of part of the borough's population, and with no formal status, it would not be suitable to include as a plan, programme or strategy in the SA scoping report. there is no mastplan to include in the list of plans, programmes and strategies.

Guildford Vision Group, Bill Stokoe	Item 2 is not adequately dealt with in the URS report. The evidence base is of poor quality, is incomplete and is dis-integrated – far from the requirements of NPPF (158): “Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated , and that they take full account of relevant market and economic signals”	No further data is suggested here
Guildford Vision Group, Bill Stokoe	Page 5) Establish relevance of Regional Strategy to Local Plan: It would be helpful for the purposes of the Scoping Report to have a clear legal understanding as to the relevance of the Regional Strategy to Guildford’s Local Plan process, given the previous successful challenge to key elements of it.	The SA Plan has been revoked, 27/2/13 - (except for two policies) so all references to it have been removed
Guildford Vision Group, Bill Stokoe	Economy & Employment <i>Key conclusions needed re nature of growth and impact of development. Lack of recognition of key contribution of knowledge economy:</i> We are alarmed that URS, whilst referring to the 2009 Economic Report, fails to draw conclusions from it – especially failing to take on board the key obstacles to growth and the primary areas for focus referred to therein.	Please make sure that this document is referenced
2. Is there any data that could further inform the baseline?		
Gordon Bridger	It also makes it quite clear that the greatest hindrance to further development is traffic congestion and the greatest need is for affordable housing . They quote a survey carried out by GBC in 2008 which asks “Factors making The Borough bad for Business”. Overwhelmingly 63% quoted Traffic Congestion and Lack of affordable housing (also 63%).	Updated data under “economy” subsection
Gordon Bridger	One of the most important conclusions of the 2009 Economic report was that traffic congestion was the main problem facing the town centre and that key worker housing Guildford’s greatest need. Why has this been ignored ?	This has been covered at the beginning of the ‘employment’ section and is also covered in sections 9 (Housing) and 7 (Transport).
Gordon Bridger	Population Increase - this has been given as increasing to 162,000 by 2035. I trust the justification and implications of this objective will be established	Bottom of page 8 - footnote 18 - add source of projections (CLG?)
Gordon Bridger	Economy and Employment - this refers briefly to the excellent 2009 Economic Report and mentions the Gross Value Added (GVA) of various sectors but completely fails to draw conclusions from it. The most important economic growth sector at 31% of GVA is that provided by professional technical knowledge based services , followed by the public sector at 30%. Retail and Distributive is a poor third, manufacturing 10%. One would expect this important lead sector, which is vital not only to our economy and also to Britain, to figure as the key to development of the Borough. Nothing doing - it gets no mention anywhere. Why has Technology been ignored ? There is no mention at all of office development (which is necessary for high skilled employment away from the town centre). Why ?	Guildford Economic Strategy (2011) identifies that the borough has a much greater reliance on the public sector and manufacturing than that of its comparator economies, and significantly less reliance on commercial business services and finance. Objective 1 of that document seeks to ‘support and expand the diversity in the borough’s business base’. In light of the Guildford Economy being reliant upon public and commercial services, the Guildford Economic Development Study notes the importance of ‘protecting the Borough’s existing manufacturing base as well as nurturing existing and attracting businesses in new and expanding sectors...’ The word “changing” could also usefully be added in before “needs of the economy”.
Jim Allen	Apart from the Information on Solar panels, etc, all the data appears to be taken from the 2001 census and is now 10 years old and due to the influx of both immigrants and increase in traffic 1.5 – 2.5 % increase per year – and loss of retail shops due to the internet – the report does not in any way reflect the real numerical situation – within the Guildford Borough as of 2013	updated census data has been included where it is available. Data is sourced from the most up-to-date Local Plan Evidence Base documents
Natural England, Francesca Barker	To comply with the SEA Directive, we recommend that you include the following in the baseline: Biodiversity - Under Designated Sites: please include “Thursley, Ash, Pirbright and Chobham” Special Area of Conservation	
Natural England, Francesca Barker	To comply with the SEA Directive, we recommend that you include the following in the baseline: The network of ancient woodland sites within the borough	There are 493 Ancient Woodland sites that are fully or partly in Guildford borough, covering approx. 1,685 hectares of the borough (data from Surrey Wildlife Trust).
Natural England, Francesca Barker	To comply with the SEA Directive, we recommend that you include the following in the baseline: The condition of Thames Basin Heaths SPA and the corresponding SPA bird data should be referred to here. The bird survey data can be obtained from 2Js Ecology (2Js Ecology: john.eyre@ntlworld.com).	Your reference - JNCC and Defra (2012) UK Post-2010 Biodiversity Framework [online] available at: http://jncc.defra.gov.uk/page-6189 (accessed 14/02/13). I have looked at this report, and cannot find page 6189. Please clarify. This is not the data suggested by NE - Thames Basin Heath SPA’s site condition assessments are available on Natural England’s website. Please could you include this. The 2JS bird survey data is available from 2JS at the cost of compiling the data (email address provided in NE’s letter). We have decided not to use data that will involve a cost to us in collecting.
Natural England, Francesca Barker	To comply with the SEA Directive, we recommend that you include the following in the baseline: A summary of the status and management of protected species, and BAP habitats and species in the borough.	
Natural England, Francesca Barker	Climate - UK Climate Projections , http://ukclimateprojections.defra.gov.uk/21678 provides data (free of charge) for the specific climate risks to Guildford. We recommend that this data and analysis is included here so the council can both establish the baseline, and predict (as best as possible) what the likely future conditions are.	
Downsedge Residents’ Association, John Twining, Chairman	In view of the importance of encouraging alternatives to car use we suggest that the baseline data should include the following: • Length of cycle lanes (preferably divided into lanes separated from traffic and lanes not separated). • Park and Ride usage.	Agree that park and ride usage and length of cycle ways could be helpful indicators.
Guildford Group of the Ramblers Association, Keith Brian Chesterton	Base data should be given on the ease of access to existing developments by sustainable modes - by foot, bicycle & public transport. For example, access to the Guildford Business Park (by Middleton Road) is not easy - it is situated close to the town centre as the crow flies but is very much further by foot. The Royal Surrey Hospital is discouraging & off-putting to the pedestrian for access by foot. Base data should also be supplied on the amount of cycling facilities available.	see Accessibility indicators for super output areas available on DfT’s website.
Guildford Group of the Ramblers Association, Keith Brian Chesterton	Base data should also be supplied on the amount of cycling facilities available.	Basedata and indicator is included (length of cycle routes, number of secure cycle stands)
East Guildford Residents’ Association (EGRA), Amanda Mullarkey	A much clearer distinction needs to be made between car ownership and use , and data should inform this.	The transport objectives have been amended and now do this
East Guildford Residents’ Association (EGRA), Amanda Mullarkey	In assessing the sustainability of plan policies, it will be important to consider the <u>proportion of journeys that involve through traffic</u> . This should include data on A3 journeys passing the town and data on through traffic crossing the centre of the town and residential streets.	The SA is based on data that is being developed for the LPS and thus reflects this data
East Guildford Residents’ Association (EGRA), Amanda Mullarkey	Noise pollution and air quality data, as required by directives, should be provided.	We are considering if data on noise levels close to residential properties and roads is available for A roads in the borough
Top Real Estate Group, Martha Covell of Edwards Covell Architecture and Planning on behalf of	Perhaps the most significant of these is that population projections for Guildford show an increase from 137,200 in 2011 to 162,000 by 2035, an increase of just over 15%. The Scoping Report states “this rise will undoubtedly put pressure on housing availability and affordability” and “Guildford will need to accommodate its share of this increasing population”. We concur with this statement. Paragraph 4.2 of the Scoping Report confirms three likely pressures that population growth will have on housing availability, affordability and housing type, as (a) Housing delivery (this is expected to increase); (b) Housing affordability (this is expected to decline); and (c) Housing need (including market and affordable housing).	We note that you concur with this statement. Not sure why there is no indication in para 4.2 as to whether we expect housing need to increase or decline (I would think to increase)
Top Real Estate Group, Martha Covell of Edwards Covell Architecture and Planning on behalf of	However we see no evidence, including that contained in the most recent Annual Monitoring Report, that housing delivery is increasing sufficiently to meet need. Whilst we acknowledge the current position in the economic cycle the AMR confirms (page 14) that Guildford is unable to show a five year housing land supply. The AMR also confirms that whilst delivery rates in 2011/12 (261) are the highest since 2007/8 there remains a growing shortfall on the interim housing figure (322) and a “significant unmet need” (1094).	Para 4.2 states that housing delivery is expected to increase, rather than that it actually has increased. Was this based on the assumption that our new Local Plan will provide more housing?
Environment Agency, Katie Newton, Planning Officer	Guildford Borough Council are currently in the process of creating a surface water management plan (SWMP). A SWMP outlines the preferred surface water management strategy in a given location. In this context, surface water flooding describes flooding from sewers, drains, groundwater, and runoff from land, small water courses and ditches that occurs as a result of heavy rainfall. Guildford SWMP encompasses the catchments within the borough for Stanford Brook in the west, the River Wey in the central area, and the River Tillingbourne and Clandon Stream in the east. The SWMP will in general terms follow the recommendations of the DEFRA “Surface Water Management Technical Guidance”. The SWMP will develop a sustainable approach to the management of surface water flood risk within the borough.	The surface water technical guidance is on line

Environment Agency, Katie Newton, Planning Officer	Spatial data in the form of maps can show surface geology, SPZs, abstraction points etc. (data previously supplied to LAs for their Part 2A contaminated land inspection strategies, for example and available elsewhere, including our website).	included baseline data from TRBMP and WCIP
Environment Agency, Katie Newton, Planning Officer	Data within the Thames River Basin Management Plan and the Wey Catchment Implementation Plan could inform the baseline.	included baseline data from TRBMP and WCIP
Environment Agency, Katie Newton, Planning Officer	Species data from the Surrey Biodiversity Information Centre could to include protected species, BAP species, Red Data Book species and invasive species.	are protected species (where known) relevant to the SA?
Guildford Environmental Forum, John Bannister	The Report states that there are "data gaps in the baseline information identified for SA Objective 14: To reduce the global, social and environmental impact of consumption of resources" and on that basis recommends that "this SA Objective should be removed from the previous SA Framework". This is the most fundamental of the objectives and must be retained. We do not accept that data gaps are a justification for its removal, the aim should be to fill the data gaps, albeit by different approaches to using data.	Provide stronger justification - reducing global impacts is important but outside the scope of the Guildford Local Plan Strategy to achieve. It can contribute locally however.
Burpham Community Association, Liz Critchfield, Secretary	It is important to encourage alternatives to car use so the baseline data might include: - Current status of cycle lanes - Usage of Park and Ride schemes.	use of park and ride bus services and maybe length of cycle lanes and number of cycle stands could be a useful indicator to record transport modal shift
HTAG Planning Group, Bob Bromham, Secretary	2.1. Review of the considerable strategic potential of Guildford's Rail Services. 2.2. Review of numbers commuting in and out of Guildford. 2.3. Survey of town centre businesses to determine why employees chose to drive to work rather than use the alternatives. 2.4. Benchmark survey with comparable towns to clearly determine the extent to which pedestrian facilities are inferior in Guildford, and the reasons for this. 2.5. We contest the predictions of population increase (15% by 2035). The increase is, at least in part, a controllable figure. Our Group strongly oppose the disproportionate expansion of the town, which we consider would spoil its quality for both residents and visitors. The figure needs to be that to which we can reasonably expect to be able to contain expansion.	
Abbotswood Residents Association - Central Crescent (ARA-CC), Graham Hibbert	The document (e.g. p20) talks of an "over reliance on the Public Sector". I believe that this may give the wrong impression as I suspect that, included in the GVA for the Public Sector, are the University and the Hospital. These are areas of potential growth in high value added jobs that will be important in Guildford's ability to compete in global markets. Should section 6.5 not include an indicator concerning the quality of jobs to be created? A concern just with "maintaining low rates of unemployment" could lead to undue focus on retail sector which I understand only contributes to about 10% of Guildford's GVA.	..in the past - several government and other public sector offices have closed down in recent years, including GOSE and SEEDA.
Abbotswood Residents Association - Central Crescent (ARA-CC), Graham Hibbert	Households from across the town, from Burpham to Onslow are affected by road noise, and with the growth of traffic volumes on "A" roads this affects other houses as well. We therefore suggest that the results of noise mapping carried out as required by the European Noise Directive should be included in the baseline. An objective should be set to reduce the number of households exposed to the higher categories of noise pollution.	Noise from traffic on roads measured under the Directive
Abbotswood Residents Association - Central Crescent (ARA-CC), Graham Hibbert	Data on A3 journeys passing the town to check the impact of the Hindhead tunnel	This could be used as an indicator, but not sure how it would assist in developing our Local Plan
Abbotswood Residents Association - Central Crescent (ARA-CC), Graham Hibbert	Data on through traffic journeys crossing the centre of the town in order to measure the effectiveness of steps to reduce the number of such journeys.	Surrey County Council as Highways authority for the roads in Guildford town centre does not regularly record origin and destination of car trips.
Guildford and Waverley Friends of the Earth, Kathy Smyth	With reference to paragraph 13.3, we agree that there should be a strategy in relation to the preservation of the 'best and most versatile' agricultural land which is recognised nationally as land with agricultural grade classification of grades 1, 2 and 3a. There needs to be an additional SA objective relating to the preservation of the best and most versatile agricultural land i.e. grades 1, 2 and 3a.	Information on grade 3a as opposed to general grade 3 land is very sketchy across the whole country. We are trying to get this data (which separates grade 3 and 3a, 3a being one of the grades of best and most versatile agricultural land). this data only exists for a small part of our borough. The NPPF does not give this issue such importance that it would need a specific SA objective.
Guildford and Waverley Friends of the Earth, Kathy Smyth	In terms of strategies, an increase in the ownership of electric cars would assist with 3 sustainability objectives - numbers 2, 8 and 9. There should be a strategy to encourage this, plus the appropriate implementation and monitoring systems.	Noted that although the revisions to the SA scoping report following consultation have introduced more meaningful transport objectives, including transport modal shift, it does not distinguish between cars and electric cars.
Guildford and Waverley Friends of the Earth, Kathy Smyth	We are unable to distinguish between what you would regard as "baseline" data and other data so we have combined our answer. Further data should include:- the most up to date information on levels of pollutants including PM10's, nitrogen dioxide and nitrogen oxide nitrous oxide at monitoring stations in the centre of Guildford	GBC's Transport Planner has recommended monitoring CO2 emissions from road transport instead. The SA scoping report has been amended to reflect this.
Guildford and Waverley Friends of the Earth, Kathy Smyth	- information on levels of i) childhood obesity and ii) % of people with chronic respiratory conditions – these will enable monitoring of the health and well-being of the population in line with SA 2	Levels of obesity of all ages is a health indicator in the SA.
Guildford and Waverley Friends of the Earth, Kathy Smyth	- information on the extent and overall condition of local woodland – this would provide a basis for a woodland strategy to improve the percentage of woodland in sustainable management	Not necessary to include protection of local woodlands as an SA indicator. This is likely to be included in the forthcoming green infrastructure study.
Guildford and Waverley Friends of the Earth, Kathy Smyth	- Guildford BC apparently does not know how much of the grade 3 land in the area is classified as 3a and how much as 3b although this distinction is clearly important in the context of a policy to preserve the best and most versatile agricultural land. If this information is available we think it should be included in the baseline data. If it is not available the omission should be recognised and steps taken to acquire it.	Information on grade 3a as opposed to general grade 3 land is very sketchy across the whole country. We are trying to get this data (which separates grade 3 and 3a, 3a being one of the grades of best and most versatile agricultural land). this data only exists for a small part of our borough.
Guildford and Waverley Friends of the Earth, Kathy Smyth	- data on levels of electric car ownership in the borough	Noted that although the revisions to the SA scoping report following consultation have introduced more meaningful transport objectives, including transport modal shift, it does not distinguish between cars and electric cars.
Jennie Kyte	P.37 – Housing Affordability of housing is assessed on one salary only. However, it is the 'norm' for two salaries to be taken into account when purchasing a house. Is there any data showing this?	CLG's housing affordability data appears to be based on one income only. Applications for affordable housing are made on the basis of household income rather than individual incomes.
English Heritage, Alan Byrne	The SA Framework (Table 19.1) is inadequate in its coverage of the cultural heritage issues, indicators and objectives for the reasons set out above. A single indicator is insufficient as measuring tool and that selected is out-of date; the Buildings at Risk register was replaced by a more comprehensive Heritage at Risk register , encompassing all designated heritage assets, 5 years ago. This section also reflects the paucity of data and lack of understanding of the heritage of the borough on the part of the report authors as such knowledge would suggest a range of indicators should be adopted to carry out an appropriate sustainability assessment. Sources of data for both the evidence base and indicators could include:	indicator replaced
English Heritage, Alan Byrne	<ul style="list-style-type: none"> • National Heritage List for England • Historic Environment Record • Conservation Area Appraisals and Management Plans • Local Lists • National and local 'Heritage at Risk' registers • Historic characterisation assessments • World Heritage Site Management Plans • In-house and local (e.g. civic societies, local history groups, neighbourhood consultations) knowledge and expertise in built conservation, archaeology and urban design • The heritage assets, historic areas and landscapes themselves 	Included included Conservation Area Appraisals and Heritage at Risk information in the SA scoping report - will be relevant to preparing a heritage strategy in our Local Plan
Guildford Vision Group, Bill Stokoe	Key Point: The Scoping report should make it absolutely clear which elements of the Sustainability Base Line are within Guildford Borough Council's control and which are not. It should also make it clear what support it expects to call for and to obtain from other agencies in order to deliver each of its SA Objectives.	

Guildford Vision Group, Bill Stokoe	<i>Important current data needed:</i> We are concerned about the data sets that have been used – many are based on restatements of previous reports (the Roger Tym retail report, for example, relies on data that was collected in 2004 and applies some more recent analysis on top of that data; analysis of the current Valuation Office Rating List – available on line at www.vo.gov.uk – contradicts the underlying supply of retail space set out in the retail Report).	There is no reference in the SA scoping report to the 2006 Retail Needs Study. Scoping report refers to the 2010 Town Centre Development Study and to the 2011 V and V report
Guildford Vision Group, Bill Stokoe	<i>Full analysis of Rating List data needed:</i> We believe that a full analysis of the different property types in the Rating List is called for – including a summary of the amount of property tax raised by each sector and ward – so as to ensure that the underlying economic performance and contribution to government revenues AND the scope for a baseline for potential Tax Incremental Financing schemes can be robustly drawn.	URS - please respond
Guildford Vision Group, Bill Stokoe	<i>Summary of empty properties needed:</i> Equally, from the Borough Council's own records, there should be a summary of empty properties across all sectors to inform strategies to bring those back into use (and a corresponding indicator to reduce standing vacancy levels in all sectors).	Guildford Borough Council does have records of vacant properties in the borough. Whilst work in continuing to bring many of these back into use, the numbers are not significant in relation to overall need, and so is not referred to in the SA scoping report.
Guildford Vision Group, Bill Stokoe	<i>Better quality, integrated highway data and modelling:</i> We are unimpressed by the quality of Highways data in the Evidence Base, the lack of integration of such data and the scope for modelling alternatives against the base data. Furthermore, we are aware that Surrey County Highways have information in map form to show which junctions have been modelled and when – a summary of this information would inform the Local Plan process and assist in setting a robust Baseline for the Sustainability Appraisal.	
Guildford Vision Group, Bill Stokoe	<i>Improved data re other forms of transport:</i> Little data is available in respect of other forms of transport, for example: <ul style="list-style-type: none"> • Parking spaces, fees, average duration of stay, purpose of visit; • Park & Ride capacity, revenues, costs, intensity of usage; • Cycle lanes – locations, usage, issues and aspirations; • Pedestrians – routes, origins, destinations, facilities; • Road Junctions – data links between traffic signals; capacity studies; impact of pedestrian crossings versus subways, etc. 	Please include data where relevant and available
Guildford Vision Group, Bill Stokoe	Here, in particular, the baseline should also refer to aspirations and best practice elsewhere, which should lead to real change. If the baseline is simply a measure of making sure the situation does not get worse, this suggests that developments such as Waitrose and Solum (not to mention North Street) simply could not be permitted. It will take major infrastructure improvement to enable the traffic impacts of such developments to be accommodated.	This oversimplifies the baseline and direction of change
Guildford Vision Group, Bill Stokoe	There does not seem to be a clear rationale in Section 4 - Population, as to why the expectation of population growth is as predicted – nor even why the projected growth rate is a straight line.	The methodology behind the projections have been explained, and also updated with the most recent data (interim 2011 projections). This can be updated when later projections become available.
Guildford Vision Group, Bill Stokoe	Specifically, there are omissions from the URS baseline description in the first paragraph of Section 7.2. For example, there is no reference to the A281 which carries a lot of traffic to and from Guildford (and, crucially, through the town).	Please include as relevant to this paragraph
Guildford Vision Group, Bill Stokoe	There is also no reference in the URS text to accommodation for key workers, which, when compared with the references in the Employment section to the Hospital, for example, suggests that the baseline and objectives are neither integrated nor complete.	
3. Are there further significant issues that are present in the borough?		
Gordon Bridger	The recommendations about preserving the Green Belt seem to be unclear and contradictory. It is the Governments view that in order to reduce house prices more land must be made available in order to bring down prices and certain breaches of the Green Belt could be justified. I think the Government is right - but this needs to be made clearer.	
Natural England, Francesca Barker	Landscape - A better indicator to monitor development pressures that may impact the Surrey Hills AONB would be inappropriate development in the AONB/setting (measured by development control "objections" from Surrey Hills AONB Partnership or Natural England).	
Natural England, Francesca Barker	In order to monitor countryside recreation provision , a good indicator may be the change in countryside access routes (this should not worsen and ideally increase).	How will we be able to monitor this – what is the data source? Suggested by NEngland. Does this refer only to formal rights of way?
Natural England, Francesca Barker	Climate - Under the third issue identified, we recommend including an appropriate additional indicator: Sustainable Urban Drainage Schemes delivered in new developments (this should increase)	
Natural England, Francesca Barker	Air Quality - Deteriorating air quality in the borough as a result of increased road traffic could negatively impact the borough's sensitive designated sites through increased nitrogen deposition. We recommend to monitor the air quality of the sensitive designated sites and to use it as an indicator.	
Natural England, Francesca Barker	Again, as there appears to be shortcomings in the summary and prediction of baseline information , it is unclear whether there are further issues, such as sewers being overcapacity due to increased storm events (which could result in worsening water quality), or whether there are sufficient wildlife corridors for the movement of species between wildlife sites. Both of these could negatively impact designated wildlife sites and biodiversity. Further investigation may be necessary to fully comprehend the issues.	Information on the baseline of existing infrastructure is presented in the draft Infrastructure baseline.
Westborough, Broadacres & District Residents Association, David Bird, Chairman	We note that the Boroughs Allotments do not warrant a mention in this report. The health and social benefits of Allotment gardening are well-documented and in nationally recognised areas of deprivation such as Westborough (already a very high density Housing too), allotment space should be treasured and valued. In the whole 86 pages of this document the word "allotments" does not appear once. Allotments are of proven benefit to the quality of life of Guildford's residents as well as being part of the historical fabric of Britain.	Data on allotments has been included in the baseline
Westborough, Broadacres & District Residents Association, David Bird, Chairman	An adequate supply of allotment land is a significant issue. It is a statutory requirement. Waiting list data shows that there is already a shortage of allotments in Guildford.	
Westborough, Broadacres & District Residents Association, David Bird, Chairman	Allotments are relevant to these sections where they make a positive contribution: <ul style="list-style-type: none"> • Deprived areas. (Westborough, in which the Aldershot Road allotment site is situated, is in the most deprived national quartile.) • Health • Sport and leisure • Conservation • Historic Environment • Climate Change • Soil • Flooding • Biodiversity • Community and Wellbeing 	
Downsedge Residents' Association, John Twining, Chairman	The appraisal criteria treat Guildford as if it were an island, cut off from the rest of the country. In reality many people live in Guildford and work or shop elsewhere or live elsewhere and work or shop in Guildford. The University and the Hospital do not just serve Guildford while students from Guildford study in other towns and patients from Guildford are often treated in Frimley or other hospitals in the region. There needs to be greater recognition of this interdependence in the appraisal criteria.	The duty to cooperate should capture these issues.

East Guildford Residents' Association (EGRA), Amanda Mullarkey	Local character, distinctiveness and sense of place should be considered. These are qualities that add to well being and help to underpin economic success. If Guildford is to attract and retain skilled people who will drive the new and creative technologies of the future, it needs to cherish the valued qualities of its communities as well as creating imaginative and inspiring new developments. This requires more than just attention to designated wildlife sites and listed buildings or conservation areas. It is about green approaches, garden suburbs and soft edges between town and country, roof scapes and views, consideration for landscape and setting, quirky buildings and materials that age gracefully rather than becoming shabby. These qualities are under great pressure and have a value that needs to be captured in the Sustainability Appraisal. The residents' Aspirations for Guildford document and GBC's landscape character assessment and residential design guide should help with this. For avoidance of doubt, this is not a matter of nostalgic resistance to change but seeking to ensure change is for the better and enhances the legacy we inherit. We do not want Guildford to become a clone town with no features to distinguish it from any number of places.	Amended to include LCA
East Guildford Residents' Association (EGRA), Amanda Mullarkey	Space for cars is a major issues. Planning policies to date have got this wrong and thankfully the guidelines have now changed thus paving the way for a better approach. It is not sustainable to try to design out the car by providing no space for vehicles on development sites and treating car parks as building sites. This simply pushes cars onto residential streets and pavements, aggravates congestion and pollution, degrades the street scene, fuels loss of green space to hard standing in new developments and leads to surface water run-off issues. Half a space per flat is not a sustainable policy for a development in which each resident owns a whole car! The approach to vehicles, parking and traffic needs rethinking. The focus for the Sustainability Appraisal should be level of car use.	The transport issues, objectives and indicators have been amended to reflect car usage veruses journeys by more sustainable transport modes.
Environment Agency, Katie Newton, Planning Officer	There are two significant WFD issues that need to be highlighted. These two issues are the main reasons for failure of the majority of water bodies within the Wey catchment. - Barriers to fish migration such as weirs and culverts; - Phosphates. Both of these can be partly addressed through the planning process, e.g. CIL funding to remove weirs; buffer zones and habitat creation (e.g. reedbeds) to reduce phosphates entering watercourses. Non-native, invasive species are also an issue, particularly on watercourses – they are not only an issue for biodiversity, but also cause flood risks (e.g. floating pennywort clogging weirs) and economic issues (e.g. Japanese knotweed on development sites).	referred to these issues relating to ecological status
HTAG Planning Group, Bob Bromham, Secretary	3.1. The lack of convenience shopping, particularly food, is a major problem. The decline continues, and Guildford is now worse than much smaller towns. Residents are forced to drive out of town because their needs are no longer provided for in the Town Centre.	
HTAG Planning Group, Bob Bromham, Secretary	3.2. Lack of retail diversity.. There are very few small, independent, or specialist shops. We disagree with the statement "...the town is populated by a wide range of shops including .. small specialist retailers".	
HTAG Planning Group, Bob Bromham, Secretary	3.3. Poor pedestrian facilities, including inadequate pedestrianisation.	
HTAG Planning Group, Bob Bromham, Secretary	3.4. Inadequate residents parking in and around the Town Centre. While firmly supporting the objective of reducing car use we know from bitter experience that restricting on-site residential parking does not lead to a reduction of car ownership or car use.	
HTAG Planning Group, Bob Bromham, Secretary	3.5. Inadequate urban open space. The town centre has become too cramped; more paved, as well as green, open space is needed.	
HTAG Planning Group, Bob Bromham, Secretary	3.6. Lack of local children's playgrounds, particularly in and around the town centre.	
HTAG Planning Group, Bob Bromham, Secretary	3.7. Lack of town centre link bus services. Services are almost entirely aimed at bringing shoppers into the town centre, where they terminate. Residents need around the centre, and cross-centre, services to access destinations such as the University, Hospital, G-Live, Cathedral, Rail Station, without having to make a change at the Bus Station.	
HTAG Planning Group, Bob Bromham, Secretary	3.8. The rationale for locating businesses in or close to the town centre is so that their employees and their clients/ customers do not have to drive to reach them. If most travel is, none the less, by car, then the business is best located out of town. Currently much congestion is caused in this way.	
HTAG Planning Group, Bob Bromham, Secretary	3.9. Re. 15, Bio diversity. Loss of biodiversity in urban areas, particularly the town centre. More trees and open green spaces are needed, not only for biodiversity, but to increase awareness of the natural world.	
HTAG Planning Group, Bob Bromham, Secretary	3.10. Re. 16 Landscape. There is an urgent need to increase access opportunity to countryside at the urban / rural fringe.	
HTAG Planning Group, Bob Bromham, Secretary	3.11. The uncontrolled demolition of modest houses to be replaced by mansions, and the large extensions to modest homes, is worsening the lack of "affordable" homes.	
Guildford Vision Group, Bill Stokoe	The Scoping report needs to focus much more on the Baseline issues and the aspirations to find solutions.	
Guildford Vision Group, Bill Stokoe	Page 2) Effective public engagement vital to establish priorities, alongside good data: The Scoping Report states that it is covering six specific topics. Items 1, 3 and 5 cannot really be answered without a process of engagement to evaluate priorities, threats, issues and opportunities. We would argue that, for Guildford's economic heart at least, this has not been completed – a Master Planning exercise, properly conducted, would have provided a good basis from which to respond to these points.	The town centre and economy is included in the Issue of the Economy and Employment.
Guildford Vision Group, Bill Stokoe	In order to form the base of a properly integrated scoping exercise, there should surely be reference in this section to the vital importance of economic growth and job creation as a means of ameliorating the current areas of disadvantage, and the avoidance of new ones, as the population increases. This is not even met in sufficient detail in Section 6 – Economy & Employment.	
Guildford Vision Group, Bill Stokoe	In Section 5.3, URS refer (number 2) to the "potential that air pollution could become an issue in some places as a result of localised congestion". We would agree with this.	
Guildford Vision Group, Bill Stokoe	On page 18, URS refer to many further education establishments in the Town and Borough but no reference is made to the lack of any real linkage between the University and the Town.	
Guildford Vision Group, Bill Stokoe	Despite the number of arts-based educational establishments, no reference is made to the cultural offering in the Town.	
Guildford Vision Group, Bill Stokoe	In Section 6, taken as a whole, there seems to be a disproportionate amount of text given over to Tourism. Which, it can be agreed, does benefit other sectors, but which is a relatively slim proportion of the overall economic generator for the Town and Borough.	Retain but rebalance with additional information on the knowledge-based economy
Guildford Vision Group, Bill Stokoe	The references to employment, in fact, are notable for their absence of focus on the knowledge-based industries which are inextricably linked with the University and the mutual success of both university and Research Park are critical factors in the future economic growth of Guildford and its place in the South East region. Most regions and Boroughs would be very jealous of Guildford's high-technology jewel. This warrants much greater emphasis and fierce protection and scope for enhancement.	There is still not sufficient information included in the Economy section about Guildford borough's knowledge-based economic sector. Please include more.
Guildford Vision Group, Bill Stokoe	Offices – there is little or no reference to office development in the Scoping Report (it merits no attention other than in reciting the content of the NPPF). The well-being of the commercial business sector is of paramount importance and this must be recognised.	include a section about offices - including many headquarters. Please add detail
Guildford Vision Group, Bill Stokoe	By contrast, retail space is afforded considerable attention by URS attention though it is not mentioned that, together with distributive and retail activities, it only accounts for 15% of GVA (10% in the Centre). No mention is made of the various retail reports based on an original report produced in 2006 – based on 2004 data – which forecasts an absurd out of date growth rate of 3.3% for comparison shopping for each year for 16 years, and the Roger Tym and Cushman & Wakefield reports which between them recommend that Guildford, in order to compete with other town centres must offer 60,000 square metres of retail space – potentially a 50% increase on current supply. It seems inappropriate that such a major hypothesis of required additional development – including an assessment of the amount and type of retail both existing and proposed – should have been excluded from the Scoping Report. There should also have been reference to the existing mix of uses which could have been drawn from several sources such as the Valuation Office Agency's Rating List, directories and original, up-to-date research.	Updated

Guildford Vision Group, Bill Stokoe	The references to the success of the Ladymead Retail Park should be tempered with a large note of caution. The Park has leases due to expire in the near future (say, within the next six or seven years) and it has Open A1 Retail use and so could become a competing retail centre to the town centre without requiring major planning consents. This threat is not even mentioned in the URS report.	The original permission for the park was for comparison goods and food and drink on the premises (ie. Cafes, restaurants).
Guildford Vision Group, Bill Stokoe	There is a long section about the Town Centre as if it were the focal point of economic growth. It no longer is – or at least it does not hold any kind of monopoly on growth. At least an equivalent emphasis should be placed on the Research Park and its knowledge-based businesses, and on the University.	There is still not sufficient information included in the Economy section about Guildford borough's knowledge-based economic sector. Please include more. Please also consider a relevant further indicator for the Economy
Guildford Vision Group, Bill Stokoe	There is reference to an overreliance on the Public Sector. A reasonable knowledge of Guildford would illustrate that the University and the Hospital will account for a significant proportion of this overreliance. The University intends to keep growing and we have no desire to lose the hospital. It is likely, therefore, that the amount of Public Sector employment will increase rather than decrease.	
Guildford Vision Group, Bill Stokoe	Transport & Accessibility <i>More aspirational response required to tackle key infrastructure issue:</i> This section seems hopelessly inadequate when so many of Guildford's issues and its inability to make more of its environmental context, all predominantly stem from a very poor and failing traffic infrastructure and a very harsh urban environment due to the Gyrotary system. Guildford's context embraces its riverside and, for health and well-being, its pedestrian and cycling routes and linkages.	See updates
Guildford Vision Group, Bill Stokoe	Housing <i>No emphasis on need for adequate and appropriate housing supply:</i> URS begin this section by quoting the NPPF (in particular Paragraph 47) and follow this with a number of charts which show that average house prices are substantially in excess of the national average (almost double) and the regional average (about 45% higher); they also show that average house prices are at more than 10 times average earnings, putting houses beyond the reach of lower income workers. Fewer than 8% of households fall within the lower Council Tax Bands A & B, compared with a national average of almost 45% (South East region 26%). This summary of the house prices bears out the findings of the 2009 Economic Report and the experience of our members in terms of Corporate Occupiers excluding Guildford from any shortlist of preferred locations due to lack of housing which their workforce could afford.	
Guildford Vision Group, Bill Stokoe	Equally, URS refers (10.1) to the need to address "the connections between people and places", again failing to take any cue from this in setting the objectives – despite the fact that connectivity and a lack of public squares or spaces have been identified by groups such as GVG as being of great importance to the future success of the town. At 10.3 URS cite as the only indicator for this section that "Buildings on the at-risk register...should decrease". For a town and Borough with the depth of heritage assets and resources, there must surely be more indicators against which to measure the Local Plan proposals when they are advanced.	See amended report
Guildford Vision Group, Bill Stokoe	Guildford has a series of flood plains and it also has substantial development potential in the river corridor (see our responses to Section 14 – Water).	
Natural England, Francesca Barker	Biodiversity - We have found shortcomings in the summary and prediction of baseline information as the report only refers to the issue of potential impact on the condition of the SSSIs, and has not identified any wider issues relating to biodiversity for the entire borough . In order to comply with SEA Directive, a more thorough review of the issues should be considered. The council should consider the following:	URS to further consider biodiversity across the borough, suitable indicators for measuring change in it, and how we can monitor the local plan's effect on it.
Natural England, Francesca Barker	With regards to monitoring the Conservation Objectives of the Thames Basin Heaths SPA, the Strategic Access Management and Monitoring (SAAM) project will, as the evidence becomes available, be reporting on the effectiveness of the SPA avoidance strategy and the SPA condition on behalf of the 11 TBH LPAs. The council will be kept informed of progress on this through, amongst other means, the Joint Strategic Partnership Board meetings.	Mention in the SA scoping report
Natural England, Francesca Barker	Biodiversity Action Plan Priority Habitats and Species in Guildford could be threatened by development and provide an opportunity for enhancement: 1) the achievement of BAP targets and 2) the change in area and condition of BAP Habitats/Species should be used as an indicator (this should not worsen and ideally increase)	
Natural England, Francesca Barker	Ancient Woodland sites in Guildford could be threatened by development: the area and buffer zone of ancient woodland should be used as an indicator (this should not decline and buffer ideally increase)	Except for Appendix A, I cannot see any indicator in v3 (19/2/13) - please confirm where this is, or add to the main part of the under biodiversity. I have a list of ancient woodlands in the borough, and their sizes that I can email to you.
Natural England, Francesca Barker	Local Wildlife Sites in Guildford could be threatened by development: the change in area and condition of Local Wildlife Sites should be used as an indicator (this should not worsen and ideally increase)	Who monitors the condition of these? Surrey Wildlife Trust? I cannot see any indicator in v3 (19/2/13) - please confirm where this is, or add to scoping report in suitable location.
Natural England, Francesca Barker	The Plan provides an opportunity to deliver the Biodiversity Opportunity Areas in Guildford: the achievement of delivered targets for BOP should be used as an indicator (this should increase)	
Downsedge Residents' Association, John Twining, Chairman	We think that the URS report is weak on Transport and Traffic. It gives some detail on, and discusses, journeys to work. We recommend that there should also be coverage of: <ul style="list-style-type: none"> • Journeys for taking children to school and journeys for shopping, both of which can create congestion • Cycling (see also 2 above) • Effect of through traffic mixing with traffic for local destinations • Need for additional crossings of river and railway • Parking problems in Guildford town centre • Parking problems in residential areas, often created by inadequate provision for on site parking in new residential developments (e.g. Boxgrove Gardens) • Historic deficit of traffic infrastructure exacerbated by increased development • Noise pollution caused by traffic, in particular from the A3 (air quality is adequately covered). 	Transport section and indicators have been reworked
4. Are there any additions or amendments that you recommend for the SA Framework?		
Gordon Bridger	In Objectives (para 4.6) no mention is made of the need for economic growth as the only way that social objectives such as less unemployment and a better environment can be paid for. A serious omission.	No para 4.6 relating to objectives. Two economic objectives are included at para 6.5.
Gordon Bridger	The section on traffic is full of platitudes and conclusions and are ones which are obvious - "more must be done" type. It might have been useful to urge GBC to avoid new enterprises which are based on increased car movements (e.g. supermarkets in the centre). Recommendations that car ownership should be discouraged are quite unrealistic as cars are now essential for shopping and a social life.	The transport section has been amended, including car ownership. However, it is important to note that developments such as supermarkets in the centre actually generate less car trips than those outside, as centres also offer the option that visitors may use train stations and many bus routes.
Tony Pugh	Page 50 Para 11.3.3 "Indicator – number of dwellings at risk of flooding (this should decrease):" - Surely this should INCREASE as more and more developments are permitted in areas prone to flooding and the storms increase in frequency and strength. FRA's and SUDS seem to have little value. Two recent developments in Waverley with detailed FRA's and full SUDS have both flooded! - the planning department and developers were comprehensively warned of the flood risk by the residents but were ignored.	Indicator changed to 'number of planning applications approved with EA Objections based on flood risk'.
Tony Pugh	Page 53 Para 12.3.3 "Development in the Borough has the potential to exacerbate congestion and therefore reduce air quality, principally from vehicle emissions." This is not necessarily true as the statement fails to take into account the continuing substantial reductions in motor vehicle emissions due to tighter regulations. Air quality may well be improving.	increase in car use and improvements in technology do not cancel each other out
Natural England, Francesca Barker	Natural England recommends that you include the additions suggested under "biodiversity". We recommend that you refer to the underlined section under the issues and indicators. Soil - To comply with NPPF Paragraph 17 the council should "encourage the effective use of land by reusing land that has not been previously developed (brownfield land), <u>provided that it is not of high environmental value.</u> "	NPPF para 17 included. included in 'context' rather than indicators.
The University of Surrey, Terence O'Rourke on behalf of	The criteria for assessing alternative sites set out in section 18.2 only include 'significant adverse', 'adverse' and 'non-adverse'. These criteria do not distinguish between neutral and positive effects, which could mean that the advantages of some sites are not fully expressed in the assessment.	The site criteria will be changed.
The University of Surrey, Terence O'Rourke on behalf of	The SA objectives set out in table 19.1 are not particularly well balanced between the three SA headline topics (social, economic and environmental). Five of the objectives relate to social issues, 11 relate to environmental issues and only two relate to economic issues. This may mean that the assessment will underplay economic issues.	The objectives have been reconsidered in light of responses and objectives and indicators on the economy amended.

Downsedge Residents' Association, John Twining, Chairman	In Economy and Employment. Issue 1 and its indicator (Qualifications or lack of them) we suggest that the indicator should include levels of qualifications and not just age of individuals. Issue 2 , first line.	It seems to me to say "qualifications at all stages"
Downsedge Residents' Association, John Twining, Chairman	We think 'cost of living' is a misprint for 'cost of housing'.	Agree - need to change "living" to "housing" - that is what prevents these workers from living in Guildford
Downsedge Residents' Association, John Twining, Chairman	Issue 3. The concentration on Tourism is misleading. A major issue is to get the right balance between Retail, other Service industries and professions, and Research.	I'm not really convinced about the indicators selected for Economy and Employment (why have 2 concerning tourism?)
Guildford Group of the Ramblers Association, Keith Brian Chesterton	Transport & Accessibility - We suggest the addition of a second SA objective "To increase use of sustainable transport modes"	SA objectives and indicators for transport have been changed, and now include percentage share for each sustainable mode.
East Guildford Residents' Association (EGRA), Amanda Mullarkey	The report also focuses on reducing congestion. The objective should instead be <u>increasing the proportion of non car journeys per resident and visitor</u> . Sustainable development requires making alternatives available and attractive.	The transport issues, objectives and indicators have been amended to reflect car usage veruses journeys by more sustainable transport modes.
East Guildford Residents' Association (EGRA), Amanda Mullarkey	Our comment on the sustainability objectives are as follows: (our suggested amendments or additions are shown in bold, and the equivalent SE Plan version of sustainability objective in italics). Although well intentioned, we do not see the objective (1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford) as realistic as drafted. It fails to describe which "people". Anyone who wants or needs a home in Guildford? Why in Guildford? If I say I want to live in Chelsea, should I be able to afford a home there? Equally mixed communities are desirable. Does housing growth drive economic growth or vice versa? How is account taken of capacity and links with other settlements? We suggest the objective should be: 1. To provide a range of homes taking account of need, commuting patterns, capacity and affordability.	The wording of this objective has been slightly amended.
East Guildford Residents' Association (EGRA), Amanda Mullarkey	5. To reduce poverty and social exclusion for all sectors of the community. <i>SE Plan 8. To improve accessibility to all services and facilities</i>	Accessibility to services is picked up in other indicators and objectives
East Guildford Residents' Association (EGRA), Amanda Mullarkey	7. To make the best use of previously developed land and existing buildings and encourage sustainable construction while also respecting the valued character, landscape features and views of adjoining areas. This addition relates to safeguarding qualities that provide distinctiveness and sense of place as described above. This concerns irreplaceable assets and pillars of economic and social wellbeing. This proposed addition is distinct from objective 10 and is needed to encourage site sensitive decisions and prevent inappropriate cramming in the name of sustainability	
East Guildford Residents' Association (EGRA), Amanda Mullarkey	8. To ensure air quality continues to improve and noise / light pollution is reduced.	Should we include this, along with an indicator?
East Guildford Residents' Association (EGRA), Amanda Mullarkey	The addition of noise pollution is welcome and should be supported by baseline data and monitoring. Relying on an assumption of reduced congestion to avoid the need to create NO2 air quality action areas is not accepted by residents. There are areas such as near the A3 and gyratory where NO2 levels are high. This is before major proposed development is factored in. NO2, ozone and particulates, including small particulates, should be reduced.	
East Guildford Residents' Association (EGRA), Amanda Mullarkey	11. To reduce road congestion and pollution levels and promote sustainable alternatives to travel by car and lorry. <i>SE 15. To reduce road congestion and pollution levels by improving travel choice and reducing the need for travel by car/lorry.</i> We suggest the SE Plan version has advantages in that it promotes positive provision of alternatives and reduction in the need to use a car as described in the previous section.	The Transport objectives and indicators have been rewritten
East Guildford Residents' Association (EGRA), Amanda Mullarkey	We find indicator d) of Objective 11 unclear. If this proposes fewer spaces, we strongly oppose this approach for the reasons set out.	The Transport objectives and indicators have been rewritten
East Guildford Residents' Association (EGRA), Amanda Mullarkey	Previous Objective 14. To reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products. Why is GBC proposing to cut this from objectives used in 2009? No explanation is given.	explanation is given para 19.3. lack of data
East Guildford Residents' Association (EGRA), Amanda Mullarkey	New objective 14. To reduce waste generation and disposal, and achieve the sustainable management of waste including reuse of resources. This addition is needed to strengthen the case against combustion of waste which is less sustainable than reuse of materials.	The sustainable management of waste includes reuse of resources, and is regulated by the Surrey Waste Plan.
East Guildford Residents' Association (EGRA), Amanda Mullarkey	Now 17. To maintain low rates of unemployment and high levels of economic activity. <i>SE 5. To raise educational achievement levels across the region and develop the opportunities for everyone to acquire the skills needed to find and remain in work. SE 20. To ensure high and stable levels of employment so everyone can benefit from the economic growth of the region. SE 25. To develop and maintain a skilled workforce to support long-term competitiveness of the region.</i> This seems to incorporate three elements of the SE Plan objectives. Is SE25 not needed to achieve 17? The borough has a role in the spatial planning of education and skills training.	The SA Plan has been revoked, 27/2/13 - (except for two policies) so all references to it have been removed
East Guildford Residents' Association (EGRA), Amanda Mullarkey	Now 18. To provide for a forward looking, adaptable and resilient mix of commercial development opportunities to meet the needs of the economy. SE 23. To develop a dynamic, diverse and knowledge-based economy that excels in innovation with higher value, lower impact activities. We suggest the additional text is required to achieve sustainable development in a time of great change and uncertainty as well as opportunity. We also ask for SE23 to be adopted. This is critical. It can help steer Guildford away from over reliance on retail and challenge us all to ensure we are making imaginative provision to attract the businesses of the future.	Amended wording of objective 18 to pick up the growth sector economy data. The word "changing" has been added in before "needs of the economy"
Top Real Estate Group, Martha Covell of Edwards Covell Architecture and Planning on behalf of	We support Objective 1 , but this should be amended to confirm that this relates to quantitative and qualitative provision of housing, as follows: 'To provide a sufficient level of housing to enable people to live in a home suitable to their needs and which they can afford' As plan-making proceeds we will monitor the way in which policies emerge, to ensure that they meet the necessary tests of Soundness, which are both creative and genuinely intended to overcome these issues, in accordance with the NPPF.	This suggested change would not improve the objective, as wordign "sufficient housing" is a quantitative reference.
Environment Agency, Katie Newton, Planning Officer	In Section 15.1 - Please note there are no Ramsar sites within Guildford borough, although Thursley and Ockley Bogs Ramsar site is within 3km of the borough boundary.	Delete reference to RAMSAR Convention from para 15.1
Environment Agency, Katie Newton, Planning Officer	In addition to 'protected wildlife sites', policies should also be set to protect and enhance habitats and species of conservation concern outside of designated sites.	SA Objective 9 seeks to do this
Environment Agency, Katie Newton, Planning Officer	While landscape-scale biodiversity projects are relevant, the reference to the protection of valued landscapes should be in Section 16 (Landscape), not in the Biodiversity section.	habitat classification is included under 'biodiversity'; whereas landscape types are included under 'landscape'
Environment Agency, Katie Newton, Planning Officer	Table 15.1 – Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC) needs to be added.	this has been added
Environment Agency, Katie Newton, Planning Officer	Section 15.2 - The last paragraph states: 'It is considered likely that the condition of the majority of SSSIs will remain favourable, given their importance and the fact that some SSSIs are contained within the designated European sites.' This statement is misleading because a) according to Table 15.2 the majority of SSSIs in Guildford are not in favourable condition now, so how can they 'remain favourable?', and b) their 'importance' as SSSIs does not guarantee a favourable condition, as is clear from only a minority being in favourable condition. This sentence therefore needs to be removed and replaced by one that states that SSSIs will be protected and their condition enhanced, where possible, by planning policies.	amended text
Environment Agency, Katie Newton, Planning Officer	Section 15.3 - We assume the issue listed is just the main biodiversity issue, not the only one to be included?	
Environment Agency, Katie Newton, Planning Officer	The following should also be included – SACs; SNCIs; protected species; BAP habitats and species; protected species; invasive species; watercourses; green infrastructure, etc.	noted and amended

<p>Guildford Environmental Forum, John Bannister</p>	<p>Transport: Given rising population, a large increase in retail in Guildford (>40% that will attract a similar increase in car shopping trips), rising car ownership, many large developments then traffic congestion will continue to worsen. Equally, air quality and noise, which are traffic dependent, will deteriorate further. There should be a gradual reduction in car parking spaces to help the modal shifts needed to walking and cycling together with an increase in the availability, affordability and frequency of public transport. Provision for cyclists in Guildford is far behind European standards yet is a major part of a holistic solution. The shared space concept would work well in many locations where traffic and people are in close proximity and we would like to see a number of these schemes introduced. Likewise 20 mph limits are now generally accepted in all residential areas.</p>	<p>Newly worded issues, objectives, and indicators have been introduced in light of responses. This include objective 11 to rebalance the shift of transport types in favour of walking, cycling, bus and rail.</p>
<p>Guildford Environmental Forum, John Bannister</p>	<p>The Indicator "Car parking standards in new developments (this should increase i.e. the standards should be more stringent)" that is referred to in the Climate, Air and Transport sections is one we support, but feel that it should be written so that it is made less ambiguous, (perhaps by way of a footnote) so that it is clear that there should be fewer parking spaces per dwelling in future.</p>	<p>agree it needs rewording to improve clarity - suggest replacing "this should increase" with less parking will be permitted. Also some concern with "levels of car ownership should decrease" - could you specify maybe per 1000 of pop?? Or other, as the number of cars will increase as population increases.</p>
<p>Guildford Environmental Forum, John Bannister</p>	<p>We note that indicators in relation to bus usage do not address the need for the availability of viable town centre provision and of interchange facilities between bus services. We feel that these aspects should be included, especially given the likely increase of bus usage in the future.</p>	
<p>Guildford Environmental Forum, John Bannister</p>	<p>Air: We do not agree that there is a good performance on air quality. Guildford has a data base and it shows three sites (two in central Guildford) that are very near or exceeding 40 micrograms/cu.m NO2 with a clearly rising trend. Ground level ozone is frequently seen in urban areas in summer. There is a clear link between the rise in respiratory problems and premature deaths due to urban exhaust emissions. The factors listed under Transport above will continue to drive these trends. Decisive modal shift solutions must be included to improve the wellbeing of Guildford stakeholders in any revised Local Plan. Constraints on car use have to be a part of the solution. We consider it is unsafe to assume that there will not be any need for Air Quality Management Areas in the near future, and suggest an indicator that air quality be progressive reduced to well below the thresholds should be included.</p>	<p>The Council is required to carry at an annual review of air quality to determine whether there is any requirement for a detailed assessment to be undertaken prior to the possible declaration of an Air Quality Management Area. The 2012 review did not identify any 'site of relevant exposure' which require a detailed assessment to be carried out. There are sites which either marginally exceed or are close to the 40 ug/m3 maximum but these are not 'sites of relevant exposure' eg residential properties. The Council's Environmental Health Service disagrees that there is clearly a rising trend. The increase in the 2011 data was more to do with the way the data was 'bias adjusted' to take into account the variables of different analytical laboratories. In previous years the bias adjustment factor was based on co-located data with real time monitoring data obtained from the Air Quality Monitoring Station. As this is no longer available, the bias factor was obtained from a national derived value, not local as in previous years. For example, a annual mean result of 39 ug/m3 in 2010 would have been bias adjusted to 36 (39 x 0.92 whereas in 2011 it would have been 41 (39 x 1.06). Local authorities are not required to take ozone into account for the purposes of the report and therefore I have no data with regard to this pollutant. It is not clear what indicator Guildford Environmental Forum is either referring to or which could be used to further identify any trends. The annual appraisal methodology and procedures followed with respect to the annual review are contained in the Technical Guidance Document published by Defra and are closely adhered to. The annual report is required to be forwarded to consultants working on behalf of Defra for appraisal prior to publishing. The 2012 report was accepted in its entirety and 'the conclusions reached accepted for all sources and pollutants'.</p>
<p>Guildford Environmental Forum, John Bannister</p>	<p>Water: Per capita consumption of water in the south east averages over170 l/person/day. Guildford's consumption is probably higher still. There are simple ways to reduce domestic water consumption and we need to raise awareness of the issues. As it is such a vital resource and the south east is under water stress a target to reduce consumption should be included. Upstream catchments management plays an important role in flood management but is not mentioned.</p>	<p>include anything useful on catchment management</p>
<p>Guildford Environmental Forum, John Bannister</p>	<p>We feel that biodiversity protection and enhancement should not only be measured in terms of an indicator for sites designated for their ecological importance, but should be measured across the whole area of the Borough. This includes the built environment (where for example, green roofs and bird nesting/roosting facilities can be created).</p>	<p>agree that biodiversity is wider than just designated sites, but am not sure what indicators we could use to measure this?</p>
<p>Guildford Environmental Forum, John Bannister</p>	<p>In terms of sustainable construction, in the Climate section, the inclusion of "b) Indicator – installed renewable energy generation (this should increase)" should not detract from the importance of designing buildings to minimise energy use.</p>	<p>concern noted. This is an issue to consider in the Local Plan.</p>
<p>Burpham Community Association, Liz Critchfield, Secretary</p>	<p>There is a degree of weakness in the section on Transport and Traffic. - It concentrates on work journeys; we feel it should include school/shopping journeys which can also cause/exacerbate congestion. - There is a need to consider additional crossings of the river and the railway. - Parking problems. The SA looks for a decrease in car ownership and requires more stringent car parking standards. The first is unlikely; people need to use cars in our mobile society (unless public transport is improved one hundred fold) therefore they need to own them. If car parking standards are reduced for new housing then residents will simply use surrounding streets (as has already happened in Boxgrove Gardens and The Brambles), causing inconvenience and annoyance. - There should be consideration of the effect of through traffic mixing with local traffic e.g. the A3 Guildford bypass.</p>	<p>The transport issues, objectives and indicators, including indicators on car parking standards have been re-written.</p>
<p>HTAG Planning Group, Bob Bromham, Secretary</p>	<p>4.1. The Transport & Accessibility section (7) needs to be much stronger and more prominent, particularly as this is the scoping report for a Sustainability Analysis. It is clear from years of observation that the congestion problem is only at the start and end of the working day, and is almost entirely due to commuting to work and the school run. If some of these particular journeys could be made without car use, the congestion problem would be overcome. Please see comments elsewhere about transport</p>	<p>See updates</p>
<p>HTAG Planning Group, Bob Bromham, Secretary</p>	<p>4.2. The SA objective 11 "To reduce road congestion and pollution levels" is too narrow, it must include a major increase in the percentage of journeys made by "sustainable" transport.</p>	<p>See updates</p>
<p>HTAG Planning Group, Bob Bromham, Secretary</p>	<p>4.3. Re 7.3(2)and "issue" in SA Framework. The lack of attractive alternatives to car travel is an issue for town dwellers as well as rural residents, albeit perhaps less severe.</p>	<p>Amended</p>
<p>HTAG Planning Group, Bob Bromham, Secretary</p>	<p>4.4 Re 5.3(3). Obesity will be reduced not just by "Provision of adequate sports and leisure facilities" but also by encouraging more journeys to be made on foot or by bicycle.</p>	<p>Two new objectives relating to transport modal shift and to sustainable patterns of development have been included in the revised SA scoping report following consultation</p>
<p>HTAG Planning Group, Bob Bromham, Secretary</p>	<p>4.5. Re. SA Framework, Air, indicators c and d, decrease in car ownership, decrease in residential on-site parking. These are not in themselves beneficial objectives and they cannot therefore be considered to be indicators in the context here.</p>	
<p>HTAG Planning Group, Bob Bromham, Secretary</p>	<p>4.6. Biodiversity, SA Framework, indicators, add "number of indigenous trees and areas of insect friendly plants in the urban area".</p>	
<p>HTAG Planning Group, Bob Bromham, Secretary</p>	<p>4.7. Landscape, SA Framework, add indicator "number of new footpaths created and increase in area of general public access land".</p>	
<p>Abbotswood Residents Association - Central Crescent (ARA-CC), Graham Hibbert</p>	<p>SA Objective 11 – To reduce road congestion and pollution levels. We suggest that there should be an objective not just to reduce road congestion but to reduce through-traffic volumes crossing the centre of Guildford. I understand that the brief for the "Town Centre & Town Approaches" study seeks only to restrain the growth in traffic volumes through the centre of the town. I suggest a reduction in cross-town traffic volumes should be sort, in order to improve the attractiveness of the town centre. Residents will not want this diverted traffic finding "rat runs" though residential areas and so indicators need to be in place to encourage the planning of alternative routes to cross the town e.g. the construction of an additional bridge over the river and railway.</p>	<p>See updated transport section</p>
<p>Guildford and Waverley Friends of the Earth, Kathy Smyth</p>	<p>The relevant SA Objective in relation to energy is 17. In our view the overriding objective should be energy conservation, i.e. using less overall. The 19C English economist Edward Stanley Jevons noted in his 'paradox' that as efficiency goes up, consumption tends to follow. As a result technological improvements cannot be relied upon to reduce fuel consumption.</p>	<p>Now objective 16.</p>
<p>Guildford and Waverley Friends of the Earth, Kathy Smyth</p>	<p>We therefore think that the strategy in relation to renewable energy needs to be re-examined and we suggest that current SA Objective 17 needs to be amended to read: 'To increase energy saving and energy efficiency across all sectors and materially increase the proportion of energy generated from renewable sources'.</p>	<p>Amend</p>
<p>Guildford and Waverley Friends of the Earth, Kathy Smyth</p>	<p>There is an objective relating to health and wellbeing but no specific reference in that objective to reducing levels of obesity which we think is an omission.</p>	<p>The SA framework includes indicator to measure rates of obesity at all ages.</p>
<p>Guildford and Waverley Friends of the Earth, Kathy Smyth</p>	<p>Urban planners should be able to make a contribution to reducing levels of obesity by promoting active transport and creating a better environment for increased walking and cycling in urban area. This can be done by increasing the feeling of safety and well-being for pedestrians and cyclists and giving them a higher level of priority over the car. This should over time encourage modal shift.</p>	<p>The SA framework will be amended to include transport and land use pattern objectives and indicators to effect and to measure modal shift in transport patterns.</p>

Guildford and Waverley Friends of the Earth, Kathy Smyth	Modal shift would also help with SA objective 11 relating to traffic congestion.	The SA framework will be amended to include transport and land use pattern objectives and indicators to effect and to measure modal shift in transport patterns.
Guildford and Waverley Friends of the Earth, Kathy Smyth	One possible indicator for modal shift would be to monitor the percentage of children walking to school and see if this can be increased over the plan period.	Whilst this could potentially be a useful indicator, it would be very difficult to get this data from all schools.
Guildford and Waverley Friends of the Earth, Kathy Smyth	What is meant by the SA Framework? This is not defined in the SA report and we have no idea to what you are referring so we are unable to answer this question. In our view this is another defect in this consultation.	It is important that readers of the SA scoping report, and later of the SA report understand what the SA framework is, and what its purpose is. The SA framework is presented at Figure 19.1, which is given as its title. We will amend the SA scoping report to make this clearer up front.
Guildford Vision Group, Bill Stokoe	The fifth bullet questions "how difficult it would be to offset or remedy any damage". Clearly, any Plan which advocates or permits the piecemeal development of key sites in Guildford would have the propensity (if not the probability) of causing widespread damage to and economic disadvantage for Guildford. The Local Plan will need to establish just what can and will be done to mitigate such effects. Far better to have started with a proper master plan, and to then analyse it within the sort of framework being proposed by this document.	As explained in this section, this relates to the indicators in the SA scoping report, and not to any masterplan for Guildford town
Guildford Vision Group, Bill Stokoe	Failing to deal with the congestion in the town centre will, inevitably, lead to poorer air quality. There should be a much clearer statement preventing development where congestion is worsened and where air quality is consequently threatened. There is no reference in the SA/SEA Objectives at 5.4 to this point and we think this is an error of omission.	This has been included in the new SA objectives and indicators for Transport
Guildford Vision Group, Bill Stokoe	On page 19, URS note that "Surrey's current economic success comes at the price of congested roads, pressure on infrastructure and high house prices. These problems of success may limit future economic growth if Surrey were to become a less attractive place to live and do business, especially in light of increasing competition from other high performing European and global regions." The 2009 Economic Report for Guildford echoes these issues and highlights them as a major competitive disadvantage. This particular issue FAILS to make it into the list of objectives at the end of Section 6. This seems to be a manifest error of omission.	Indicators for the Economy rewritten
Guildford Vision Group, Bill Stokoe	When so much of the future well-being of Guildford depends on its position as an economic value generator, it is very disappointing to see the insipid nature of the objectives in this section AND the incompleteness of the issues and indicators.	Indicators for the Economy rewritten
Guildford Vision Group, Bill Stokoe	The baseline MUST take into account that transport is a topic in which the town is failing badly. Guildford's 2009 Economic Study made it quite clear that the consequences of continuing failure are a general loss of business. GVG's members are only too aware of the fact that major corporates do not consider Guildford as a potential destination because of congestion and a lack of housing their workers can afford. The objectives must be much stronger than simply "to reduce road congestion and pollution levels" . Perhaps a better set of objectives would be: 1. to take every opportunity to reduce congestion and, if possible, to reduce or eliminate through traffic from the town centre; 2. to encourage people to walk to and around the town by creating pleasant and safe connections between attractions, transport infrastructure, shops and other major destinations.	The Transport issues, objectives and indicators have been rewritten following this consultation
Guildford Vision Group, Bill Stokoe	Guildford could impose a Low Emissions Scheme (similar to those in key London Boroughs) to reduce or eliminate heavy goods vehicles and to require Surrey County Council to procure bus contracts with companies operating low-emissions buses. URS (at 7.3.1) suggest that Air Quality Management Areas should NOT be designated in the District, and yet they give no reason for that conclusion. A more realistic objective, therefore, would be: 1. to reduce pollution by encouraging cleaner vehicles, discouraging heavy goods vehicles and discouraging traffic congestion	
Guildford Vision Group, Bill Stokoe	Public policy ostensibly aimed at trying to force people out of their cars does not generally work in Guildford. It is imperative that the traffic systems, transportation systems, pedestrian and cycle links and parking strategies are all aligned, with the presumption in favour of supporting economic growth. Otherwise, a reliance on ideological theory could have the effect of continuing the migration of businesses away from the town.	Transport objectives have been rewritten to include measuring modal shift
Guildford Vision Group, Bill Stokoe	Crime & Safety - Design out crime and anti-social behaviour: It is reasonable to assume there is little Guildford Borough Council can do with regard to policing, and yet there are areas within the town centre (plus areas in other parts of the Borough) of specific concern. Consequently, the issues at 8.2 and the insipid objective at 8.3 do not really advance the cause for designing out crime and antisocial behaviour.	These are considered to be suitable objective and indicators
Guildford Vision Group, Bill Stokoe	Cultural Heritage - Development should respect Guildford's heritage and unique ambience: URS begin this section by quoting the NPPF (64) "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." URS justifies this quotation by reference to the need to "develop policies that set out the quality of development that will be expected for the area." This represents good planning but URS then fails to incorporate any specific objective into its report to achieve this.	Why is there this section on good design?? The SA framework doesn't then include anything about good design. If not relevant to the SA framework, please remove.
Guildford Vision Group, Bill Stokoe	Climate - Proposed objectives should not deter worthwhile development: It is reasonable to assume there is little Guildford Borough Council can do with regard to climate <i>per se</i> , but planning policy can influence behaviours and, whilst it might be desirable to seek to impose artificial targets (reducing car use, for example) it is clear that Guildford Borough Council's leadership of this issue must be set in a context of the other objectives.	A new objective has been introduced - to achieve a pattern of development which encourages people to minimise journey lengths f
Guildford Vision Group, Bill Stokoe	URS's reference to the Green Belt is probably at odds with the Government's policies with regard to allowing some breaches of Green Belt to make more residential land available in order to help reduce house prices.	I am wondering whether we should remove the reference from an indicator to SA objective 10 - about green belt release - would welcome discussing this with you
	5. Is there any other data that should be included in the report? If so, please provide the source and reasons why it should be included.	
Natural England, Francesca Barker	Natural England have no further data to be included in the report.	
Downsedge Residents' Association, John Twining, Chairman	We note that the planning process is often blamed for stifling growth and delaying development. Our experience is that the fault usually lies with the developers and their architects. Initial applications often propose overdevelopment of a site or are otherwise unsympathetic to the neighbourhood. Intervention by planning officers, although it may cause delays, frequently leads to a more acceptable result, which could have been achieved earlier if the developer had been less ambitious or the architect more considerate of the neighbours. Data on the proportion of developments (excluding householder developments) which were eventually approved with reductions from the original proposal should be available in the planning office and would support the need for careful scrutiny of planning applications.	
Environment Agency, Katie Newton, Planning Officer	A map of watercourses, including main rivers and WFD water bodies. Source - Environment Agency. Reason - importance of watercourses as outlined in the Water and Biodiversity sections.	included map from Wey Catchment Implementation Plan
Burpham Community Association, Liz Critchfield, Secretary	Guildford is referred to in isolation but people work in the town yet live elsewhere; similarly they may live in Guildford and work outside the Borough. The University and Hospital serve a wider area than Guildford but town residents study and use medical resources in other places. This interdependence should be acknowledged in the criteria. - The wording of the Related Objectives is very general; the EGRA "Aspirations" document is more specific and gives a better idea of what is required.	Agreed that rivers, roads, biodiversity, etc does not stop at borough boundaries. These cross-bouadnary issues are being considered in the preparation of the local plan, inclusion through the Duty to Co-operate.
Holy Trinity Amenity Group (HTAG) Planning Group, Bob Bromham, Secretary	We note that we made extensive comments on the last SA Scoping Report in Feb 2005, and that almost all the comments made here have been made before in many planning policy consultations At 90 pages this report is too long; its size will discourage consultation on the matters raised. It is also vital that the "active" part of the report, i.e. that which will influence the rest of the Borough Plan, is gathered together in a concise summary. Ideally the report ought not to contain matters that are self evident or copies of sections of policies easily obtained elsewhere, e.g. the NPPF. Organisations like ours are already suffering consultation fatigue, and if there is to be real consultation it is vital that this process is made as efficient as possible. Our understanding is that the document gathers together in one place important information relevant to the production of planning policies, and not to set policies themselves. We hope this is correct.	This SA scoping report pulls together information required to appraise the sustainability of the new local plan throughout its production. It will be used alongside evidence studies, community views and legal and planning policy guidance to draft new local plan policy. This scoping report alone does not include all sources of information relevant to preparation of a Local Plan.
Abbotswood Residents Association - Central Crescent (ARA-CC), Graham Hibbert	The projection that population in the Borough will increase to 162,000 is crucial to the development of many services in the Borough and to the quantum of housing to be provided. It is stated that this will arise due "to longer life expectancy and in-migration". The document does not allow the resident to assess how this projection has been made and the degree of inaccuracy in the forecast. Since the South East Plan was written major perturbations have occurred in the economy. We suggest that more information be provided on this projection.	Population projections are complex, and there is not space in the SA scoping report to go into detail. The Local Plan evidence will include further detail.

English Heritage, Alan Byrne	The wording in the blue box (p42) should be amended to reflect this, i.e.: Implications for the Local Plan: • The Local Plan must ensure the conservation, protection and <u>enhancement of heritage assets</u> including Listed Buildings, Conservation Areas and Scheduled Ancient Monument, <u>and their settings</u> .	text amended
Guildford Vision Group, Bill Stokoe	We are aware of a number of data gaps or of non-current information, and 'current' data that has been based on evidence from 5 to 10 years ago when economic conditions were different; the overall policy environment and communications technology has been greatly advanced in the meantime.	
Guildford Vision Group, Bill Stokoe	The most glaring gaps in our view are in the traffic and transportation data (there is no current comprehensive model, although we are aware that some exercise is on-going in this regard), and in the retail capacity report.	
Guildford Vision Group, Bill Stokoe	A comprehensive Master Plan for Guildford would have provided the majority of this data as a critical part of the process.	
6. Do you have any comments / responses to the site appraisal criteria set out in Appendix A?		
Natural England, Francesca Barker	Natural England have no comments to make on the site appraisal criteria.	
The University of Surrey, Terence O'Rourke on behalf of	Our main comments / queries relate to sections 18 and 19 and appendix A, which set out the proposed SA methodology for the next stages. We provide further details on each. Section 18.1 discusses the assessment methodology, but it is not clear how the assessment of the implications of each of the plan policies relates to the overall assessment of the plan's significant effects against each objective of the SA framework. It is also not clear how it will be determined whether an effect is significant.	SA Objectives are used to assess the likely effects of the draft plan. The indicators are used as guidance to determine whether specific elements of the evidence base will either improve or not over time. With regard to significance, an expert judgement will be made on those effects (both positive and negative) that are identified in the appraisal, based on the criteria set out in Schedule 1 of the SEA Regulations.
The University of Surrey, Terence O'Rourke on behalf of	The balance between the alternative sites appraisal criteria is uneven; for example, there are seven criteria relating to community and wellbeing, four relating to cultural heritage and only two relating to the economy. This means that some topics will have more influence on the outcome of the assessment than others.	SEA Regulations, Schedule 2 (f) sets out that the assessment should include topics "on issues such as". This list is therefore not prescriptive nor exhaustive. It is to the discretion of the LPA to determine the framework against which they should assess their plan based on the evidence gathered. The objective of the European Environmental Assessment Directive is to "provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development, by ensuring that, in accordance with this Directive, an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment." It is perhaps therefore understandable that there is some emphasis on the natural environment.
The University of Surrey, Terence O'Rourke on behalf of	The draft alternative sites appraisal methodology in appendix A is based on a robust principle of allowing transparent comparison between the sites using quantitative criteria. However, the criteria themselves may not be robust. For example, several criteria including those relating to proximity to bus stops, railway stations, local and district centres) are repeated in more than one topic, suggesting that these criteria could have an excessive influence on the results of the assessment.	
The University of Surrey, Terence O'Rourke on behalf of	Appendix A states that it is not possible to distinguish between alternative potential site allocations in terms of their potential to support housing, and presumably the same conclusion has been made in relation to provision of employment floorspace. However, it should be possible to estimate the potential capacity of a site based on assumed density figures.	We still need to finalise the site criteria, and decide whether to include them in the scoping report or in the initial SA. Either way, no single criteria should be used more than once.
The University of Surrey, Terence O'Rourke on behalf of	The alternative sites appraisal criteria are largely focused on the avoidance of adverse effects. This therefore does not relate well to the overall SA objectives, as there are no criteria examining which sites could best contribute to meeting 'positive' objectives, such as objective 1 (to provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford) or objective 18 (to provide for appropriate commercial development opportunities to meet the needs of the economy).	As explained in the scoping report, the SA will involve qualitative assessment as well as the objective assessment against set criteria.
Westborough Allotments Self help Association (WASHA), Beverley Mussell	Suggested addition: Any proposed loss of allotment land should be resisted. Do not destroy Guildford's heritage Open Space by flogging off our Allotment Land assets.	suitable as a site criteria - is it an allotment?
Downsedge Residents' Association, John Twining, Chairman	The appraisal criteria are divided into themes and for each theme there is a statement of Issues, and lists of Indicators and Related Outcomes. We have two general comments, and specific comments on the themes of Economy and Employment, Transport and Accessibility, and Housing.	
Downsedge Residents' Association, John Twining, Chairman	In Transport and Accessibility the emphasis is on journeys to work and car ownership. We recommend that this theme should also include other destinations (schools, shops) and recognise that congestion (and the pollution it causes) arises from car use, rather than car ownership. Indicator d , suggests more stringent parking standards in new developments. Our experience is that inadequate residential parking provision on site moves the cars to nearby residential roads which are often too narrow for parking and safety.	
Downsedge Residents' Association, John Twining, Chairman	Housing, Issue 2 , in addition to the Indicator on completion rates, we suggest that there should be a related indicator showing the number of dwellings for which planning approval is given. The delay between approval and completion contributes to the housing shortage. Related Objective. While Guildford remains an attractive place to live housing demand will always exceed supply and the Objective "to provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford" will remain an unachievable dream.	Amended to "To provide sufficient housing of a suitable range taking into account local housing need, affordability, deliverability, the needs of the economy, and travel patterns."
East Guildford Residents' Association (EGRA), Amanda Mullarkey	Distance is often too crude an indicator when assessing a site, especially in Guildford where topography and views can be issues.	It would not be used to justify, simply to analyse and compare ... views are not an issue to be considered in relation to considering the accessibility of sites to facilities and services.
East Guildford Residents' Association (EGRA), Amanda Mullarkey	Criteria are needed for the proposed additional sustainability objectives. For example, the criteria for historical and environmental sites are too crude to capture the need to respect valued characteristics that give Guildford distinctiveness and a sense of place.	
East Guildford Residents' Association (EGRA), Amanda Mullarkey	Distance from a bus stop should never be used to justify higher density development. There are other important factors.	
East Guildford Residents' Association (EGRA), Amanda Mullarkey	Loss of urban open space is a worrying indicator. Surely it should increase given the green infrastructure policy?	The NPPF (para 74) allows loss of open space to building only subject to certain conditions.
Hampshire County Council, Pete Errington, Strategic Planning Manager, Economy Transport and the Environment	Hampshire County Council considers, however, that it would be useful to make more explicit reference to the ROWIP in support of the need to provide countryside recreation and access (page 68). This would then address some of the key cross-boundary concerns between Guildford Borough and neighbouring authorities such as the Basingstoke Canal Authority and Hampshire County Council Countryside Service. The Borough Council may also like to consider including a reference to the Hampshire Countryside Access Plan (CAP - see www.hants.gov.uk/countryside-access-plans), particularly the County Overview and the CAP for the Forest of Eversley area.	
Top Real Estate Group, Martha Covell of Edwards Covell Architecture and Planning on behalf of	We object to the Site appraisal methodology as it fails to meet the necessary test of soundness on the grounds that the suggested criteria is a standardised, 'off-the-peg' checklist which contains significant repetition; does not relate to the characteristics and designations specific to the Borough and fails to offer a robust methodology for site comparison, as the results are not quantifiable.	We are to change the site assessment criteria following responses received.
Top Real Estate Group, Martha Covell of Edwards Covell Architecture and Planning on behalf of	The site assessment criteria fails to meet the necessary tests of soundness and should be amended to ensure that most notably there is a presumption in favour of sustainable development and it positively seeks opportunities to meet the development needs of the area in accordance with the NPPF, instead of being based on existing policies designed to constrain development such as green belt policy (Land and Waste Criteria).	These criteria are to be changed following responses received. Protection of Green Belt from inappropriate development remains a national policy aim, subject to other consideration. The Sustainability Appraisal seeks to balance its three strands in assessing the emerging Local Plan.
Top Real Estate Group, Martha Covell of Edwards Covell Architecture and Planning on behalf of	The scoring system used in the site appraisal methodology to select sites is over simplified and produces nonsensical results. Instead a filtering or sieving system should be used which uses exclusionary criteria initially, followed by discretionary criteria and deliverability criteria.	We are to change the site assessment criteria as following responses received, it is agreed that they oversimplify consideration of sites. The new system will introduce criteria on which more of a judgement on each site can be made, rather than simply ticking yes or no. The deliverability of sites is not required to be considered by the SA. Rather the deliverability of sites is being considered in the Strategic Housing Land Availability Assessment and the Employment Land Assessment.

Top Real Estate Group, Martha Covell of Edwards Covell Architecture and Planning on behalf of	We object to the 'suggested decision rules' in the Site Appraisal criteria in appendix 1 on the grounds that it fails to meet the necessary tests of soundness. A cumulative score rather than a green/amber/red light system for each criteria, may be a better way to meet objectively assessed needs as set out in the NPPF.	We are to change the site assessment criteria following responses received.
Top Real Estate Group, Martha Covell of Edwards Covell Architecture and Planning on behalf of	We object to the Site appraisal methodology as it fails to meet the necessary test of soundness on the following grounds: it is a standardised, 'off-the-peg' checklist which contains significant repetition; * does not relate to the characteristics and designations specific to the Borough, * Fails to offer a robust methodology for site comparison, as the results are not quantifiable.	this comment concerns the site assessment criteria
Top Real Estate Group, Martha Covell of Edwards Covell Architecture and Planning on behalf of	A review of the site appraisal criteria reveals a confusing mix of criteria and contains repetition e.g. accessibility to a bus stop, rail station, local centre and district centre are all included twice.	
Top Real Estate Group, Martha Covell of Edwards Covell Architecture and Planning on behalf of	They are not Guildford Borough Specific - eg. Under the heading 'Landscape' instead of the lose term landscape character it should include AONB to reflect the Surrey Hills AONB designation. Similarly under 'Biodiversity and Green Infrastructure' it omits to mention Special Protection Areas (Thames Basin SPA). Clearly this is relevant as parts of the Borough lying between 400m and 5km of the SPA (buffer zone) include the northern two thirds of the borough.	Update to include AONB, SPA/SAC covered in HRA but can include criteria on these sites
Top Real Estate Group, Martha Covell of Edwards Covell Architecture and Planning on behalf of	Omissions - Under the heading 'Water' no criteria are listed, whereas the Borough has a number of Groundwater Source Protection Zones located in Guildford Town Centre and East and West Clandon. Similar to Flood Zones, the Environment Agency take a risk based approach to certain development activities in SPZ1 zones. In areas of southern England, groundwater supplies up to 80% of drinking water and given the extent of water stress SPZ's can potentially be a significant constraint to development.	why no criteria for assessing sites -if there are no suitable measurements, as for air quality - then refer to or exclude
Top Real Estate Group, Martha Covell of Edwards Covell Architecture and Planning on behalf of	Inappropriate criteria - Under 'Land and Waste' the suggested criteria includes Green Belt. SHLAA practice guidance advises that the scope of any assessment should not be "narrowed down by existing policies designed to constrain development". Green Belt should not be included as a basis for site appraisal as it is generally applied to land with no intrinsic value other than to protect land for the sake of preserving openness in line with the five purposes of the Green Belt4.	This is not the SHLAA, so the guidance is not relevant to this SA scoping report. However, current government planning policy does give a significant degree of protection to green belt as a national designation. All other things being equal, a non-green belt site should be used before a green belt site.
Top Real Estate Group, Martha Covell of Edwards Covell Architecture and Planning on behalf of	Weighting - We object to the method in which sites are weighted and scored as set out in Paragraph 18.2 and in Appendix A, as this is unsound. The scoring system is based on 'decision rules' and a simple traffic light (amber) or non-adverse (green) and not a quantitative or qualitative analysis. The supporting text refers to the application of a 'qualitative analysis' but offers no further explanation or example of what this might mean in practice.	The site criteria will be changed
Top Real Estate Group, Martha Covell of Edwards Covell Architecture and Planning on behalf of	As it stands it would appear that in site selection terms; two sites with comparable scores, for example one being more than 800m from a bus stop and in flood zone 1 and the other within 400m of a bus stop but located in a functional flood plain would, in effect, end up with the same score. Clearly this, if correct, would be nonsensical. Any scoring system must be applied consistently and transparently. Provision of a commentary and notes to accompany a criterion based method should include impact mitigation alongside the issues being assessed to help provide the rationale behind selection.	The site criteria will be changed
Top Real Estate Group, Martha Covell of Edwards Covell Architecture and Planning on behalf of	Suggested Amendments to Weighting - In preparing Local Plans, authorities often have to consider strategic extensions or perhaps new settlements or extensions to existing settlements to accommodate housing need. By adopting a filtering or sieving approach the possible broad locations for housing could be assessed in the same way as individual sites. This, would offer a more rounded and coherent assessment of potential sources of land supply.	The broad / strategic location of major new development will be tested through the initial SA, and SA site criteria weighting does therefore not need to be introduced for this reason.
Top Real Estate Group, Martha Covell of Edwards Covell Architecture and Planning on behalf of	As illustrated above, the site appraisal criteria do not differentiate between 'strategic' and 'local' constraints, seemingly giving all criteria equal weight. An alternative and more robust approach would be to filter sites through a three stage process: Stage 1 Exclusionary criteria (i.e. clear cut) e.g. flood risk 3b areas; areas of outstanding natural beauty (AONB); SSSI and SPA buffer zones; Stage 2 Discretionary criteria e.g. relating to public rights of way, local nature conservation designations, heritage and listed buildings, conservation areas etc. These criteria might not necessarily lead to the exclusion of a site but could be important from a sustainability perspective and should influence the decision as to whether or not a site is taken forward (and, if it is, the conditions that might be attached to any development); Stage 3 Deliverability criteria e.g. proximity to facilities and services, land ownership, access, planning history, size, shape, topography etc. all of which may have a bearing on whether or not the site is deliverable as a location for development. An example of this three stage site appraisal exercise was taken undertaken by Levett Therivel on behalf of Dover District Council.	We will change the criteria for assessment of sites from that proposed in the draft SA .
Top Real Estate Group, Martha Covell of Edwards Covell Architecture and Planning on behalf of	Suggested decisions rules: accessibility criteria - We object to the 'suggested decision rules' in the Site Appraisal criteria in Appendix 1 on the grounds that it fails to meet the necessary tests of soundness. A cumulative score rather than a green/amber/red light system for each criteria, may be a better way to meet objectively assessed needs as set out in the NPPF. In relation to accessibility to services/facilities this method is a crude assessment of accessibility which fails to acknowledge the importance of 'catchment flexibility'.	
Top Real Estate Group, Martha Covell of Edwards Covell Architecture and Planning on behalf of	Consumer choice and high levels of mobility for many means local people may or may not choose to use local facilities at all. Just because a bus stop or rail station is close by doesn't mean the bus or train will go the way a passenger wishes. Accessibility criteria such as those proposed in the appraisal methodology are based on urban sustainable community principles and if slavishly applied will do nothing to safeguard or enhance the opportunities for development in rural areas. It is well documented that accessibility can be challenging for rural communities particularly where there is insufficient population to support certain services but where additional growth could safeguard or enhance those that already exist, or re-introduce those which have been lost.	
Top Real Estate Group, Martha Covell of Edwards Covell Architecture and Planning on behalf of	DfT guidance defines accessibility as the ease by which an individual can access services and facilities that he or she needs or desires using one or more modes of transport. The site appraisal criteria should be amended in accordance with DfT guidance. Accessibility should also consider the catchment characteristics of a given location. The guidance goes on to state that a range of factors impact upon accessibility such as, travel time; cost of travel; fear of crime; location of facilities and services; and, knowledge of available travel choices.	
Top Real Estate Group, Martha Covell of Edwards Covell Architecture and Planning on behalf of	The Institution of Highways and Transportation produced guidelines containing walking and cycling distances which seek to establish the catchment area for these modes and the distance pedestrians or cyclists can reach within a set time. The guidelines recommend a two stage process which involves estimating time by analysis of maps; then checking the actual times of people travelling these routes. Failure to adopt such an approach could artificially constrain a search for sites and site appraisal and risks ignoring the practical reality of how people choose to make trips. The guidelines consider that journeys of up to 1 km for walking and 4km for cycling are normally appropriate with a preferred maximum of up to 2km to 'District facilities' and 8km for cycling, and journey times of ½ hr from home to work by mixed modes similarly so. The site appraisal criteria should be amended in accordance with IHT guidance.	
Environment Agency, Katie Newton, Planning Officer	The site appraisal criteria for Biodiversity in Appendix A are generally good and include such topics as green infrastructure and linear features, these aspects are missing from the Biodiversity section (Section 15).	
Environment Agency, Katie Newton, Planning Officer	'Avoid direct impacts to important biodiversity sites and linear features' – please add avoid direct impacts to important species and habitats, as these often occur (especially species), outside of designated sites.	The site criteria will be changed
Environment Agency, Katie Newton, Planning Officer	Suggested criteria:	The site criteria will be changed
Environment Agency, Katie Newton, Planning Officer	- adjacent to a SSSI should be in red?	The site criteria will be changed
Environment Agency, Katie Newton, Planning Officer	- please add effects on SPAs, SACs and Ramsar sites	The site criteria will be changed
Environment Agency, Katie Newton, Planning Officer	- please add effects on protected and BAP species	The site criteria will be changed
Environment Agency, Katie Newton, Planning Officer	- please add effects on watercourses – development to be a minimum of 8m from the bank top of a main river or 5m from an ordinary watercourse, pond or wetland habitat, i.e. the need for undeveloped buffer zones.	The site criteria will be changed
Environment Agency, Katie Newton, Planning Officer	Site appraisal criteria for groundwater protection are (suggested):	The site criteria will be changed
Environment Agency, Katie Newton, Planning Officer	1. Aquifer status under WFD (principal, secondary, non-productive)	The site criteria will be changed
Environment Agency, Katie Newton, Planning Officer	2. SPZ (catchment, outer, inner zones)	The site criteria will be changed
Environment Agency, Katie Newton, Planning Officer	3. Distance from public / private abstraction for drinking water.	The site criteria will be changed

Environment Agency, Katie Newton, Planning Officer	4. Distance to mains sewerage (e.g. <100m; <250m; >1km)	The site criteria will be changed
Environment Agency, Katie Newton, Planning Officer	5. Land known / suspected to be contaminated (N.B. remediation of land known to be contaminated is a positive step in reducing on-going deterioration of groundwater in underlying aquifers - see SA Framework suggestion)	The site criteria will be changed
Environment Agency, Katie Newton, Planning Officer	6. Groundwater vulnerability (e.g. shallow / deep water table; presence / absence of protective clay strata at surface)	The site criteria will be changed
Environment Agency, Katie Newton, Planning Officer	7. Nature of development (residential or industrial)	The site criteria will be changed
Environment Agency, Katie Newton, Planning Officer	Include reference to GP3.	The site criteria will be changed
HTAG Planning Group, Bob Bromham, Secretary	6. No Comments at this stage.	
Abbotswood Residents Association - Central Crescent (ARA-CC), Graham Hibbert	The objective "to provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford" has never been practical and will never be. It misses that point that London overspill will consume any spare housing capacity. It also does not take account of the "gap town" topography of the town. A more sensible object would be "to build sufficient housing to meet local needs and that which can be accommodated without damaging the character of the town".	Objective 1 has been reworded in response
Guildford and Waverley Friends of the Earth, Kathy Smyth	We do not agree with the absence of any criteria in relation to air quality. Pollution levels are measured and monitored and surely some criteria can be drafted which relate to existing levels of pollution?	Air pollutant indicators have been included in the final SA scoping report under transport objectives
Guildford Vision Group, Bill Stokoe	The site appraisal criteria are somewhat generic and it is difficult to see how some of these might apply in practice for particular types of development. Does the formulaic approach suggest that particular uses will be targeted towards 'sweet' spots where they tick the most boxes? If proposed residential development is given a green mark for being within 1600m of a secondary school, this does not provide any qualification as to whether the school has any spare capacity. A one-dimensional formulaic approach might have some relevance but we are unaware as to whether the criteria suggested will facilitate sufficient development or effectively rule out most development. This set of criteria, therefore, needs testing against existing settlements and developments to establish its validity. Please see our more detailed review of the Scoping Document below at C.:	We are to change the site assessment criteria as following responses received, it is agreed that they oversimplify consideration of sites. The new system will introduce criteria on which more of a judgement on each site can be made, rather than simply ticking yes or no (the criteria in the draft scoping report are objective - ie, yes or no, and are over simplistic, they do not enable local knowledge of the area to be used).
The University of Surrey, Terence O'Rourke on behalf of	Overall, we would suggest that the appraisal criteria are reviewed before the alternative sites assessment is undertaken and that consideration is given to including more economic objectives within the SA framework.	I agree that we need further work to confirm these
	7. General comments	
Tony Pugh	Page 66 list point c "c) C. Wooded Chalk Downs; a rogue capital C has crept into the text.	
The Guildford Society's Planning Group, Martin Taplin	Chapter 4 - Population - The text and diagrams in paragraph 4.1 show that the population of the Borough in 2011 stood at 137,200. The population is predicted to rise to 162,000 by 2035. It is interesting to note (see fig 4.1) that following an 18 year period (1981 to 1998) during which the population of the Borough remained consistent at around 126,000, this was followed by 13 years (1998 to 2011) of a very consistent year-on-year increase from 125,000 to reach 137,000 in 2011. Figure 4.1 is followed by fig 4.3 which shows that, based on figures provided by the Office of National Statistics, the population of the Borough is predicted to rise from 139,000 in 2010 to 162,000 by 2035. We consider that projection should be questioned.	Figure 4.3 (ONS 2010-based population projections) does show an increase to about 163,000 people by 2035. This is the ONS's "best" estimate. However, it is clearly an over-projection, as the figure for 2011 is 142,000, and the census count in 2011 was 137,200. We are advised that this will be updated and recalculated and checked against the 2011 census in early Feb. We will replace Figure 4.3 with more accurate projections when available and will reconsider the implications.
The Guildford Society's Planning Group, Martin Taplin	As we understand it the population of the County has, over very many years, remained at or about 1 million. This almost static population has come about because whilst there has been a very significant growth of the housing stock this has been compensated by a year-on-year reduction in occupancy rates per dwelling arising from increasing levels of divorce; more people choosing to live on their own; and increasing longevity. Your report specifically identifies the fact that people have a longer life expectancy and we would have thought this factor together with other demographic characteristics would have been reflected in potential lower occupancy rates as many surviving partners continue to live in the family home.	The population of Surrey increased by about seven per cent (1.05m to 1.13m) between 2001 and 2011. In previous decades average household size in the borough (as in most of the country) measured in the census has been decreasing for the reasons that you mention. We expected this to continue. However, the 2011 census recorded an increase in average household size (as you refer to it "average occupancy rates per dwelling") from 2.37 in 2001 to 2.42 in the 2011 census, and a reduction in the number of one person households between 2001 and 2011. The main reason for this increase in average household size over the last decade is the low level of house building, difficulty in availability of mortgage lending (particularly for first time buyers), and the economic downturn which has resulted in increasing numbers of people being unable to move in to a separate home. The household size includes "concealed households".
The Guildford Society's Planning Group, Martin Taplin	It is against that background that we question the justification for the prediction of the Office of National Statistics that the population of Guildford will rise from 139,000 in 2010 to 162,000 by 2035. Given the demographic characteristics identified above, it is very worrying if that projection is accepted we consider that figure of 162,000 will require a substantial increase in the housing stock potentially with the loss of Green Belt land which would be to the detriment of the character of the town.	Natural growth is also increasing, as medical and life quality improvements result in people living longer, so the population is projected to increase naturally. Replace Figure 4.3 with more accurate projections when available and will reconsider the implications.
The Guildford Society's Planning Group, Martin Taplin	Our worry is that if the justification for the projected growth (from 130,000 in 2010 to 162,000 in 2035) is not challenged, we may find that the projected increase (of 32,000 over 25 years) will be established as a target and any slippage in achieving year-on-year growth to achieve that 'target' will then be used as justification for allocating ever more land for housing.	
The Guildford Society's Planning Group, Martin Taplin	We therefore seriously question the justification for this projected increase in population from the Office of National Statistics. We consider the projected increase should be explained and justified and we also ask if the statistics for Guildford are reflected in other Surrey Districts and in the County as a whole.	The statistics for Guildford borough are different to that of Surrey generally and of each district (they are all available on the ONS website)
The Guildford Society's Planning Group, Martin Taplin	Chapter 7 (Transport and Accessibility) - In respect of the issues in Chapter 7 (Transport and Accessibility), the Guildford Society is disappointed that there is little reference in the Scoping Document to SCC's 'Vehicular & Cycle Parking Guidance January 2012'. Within this reference Surrey states that the approach to parking should be 'flexible & pragmatic' and 'appropriate to local circumstances'. This seems not to be supported by the Scoping Paper (ref indicators c) and d) which ask for car ownership to decrease as well as car parking standards to become more stringent. Significantly these are indicators set against the apparent assumption that it is car ownership that causes congestion. It is the view of the Society that what causes congestion in Guildford is an inadequate highway infrastructure servicing this 'gap town'.	transport objectives and indicators have been amended
The Guildford Society's Planning Group, Martin Taplin	The danger is that the Council could adopt stringent parking standards without producing any benefit to reduce either congestion or car ownership. Surrey's Guidance suggests 1 space per 3 bed house in the town centre and more space per dwelling depending on location and, where space permits, an increase in this provision. If the various references in the Scoping report to further restrict parking requirements for new housing is to be proposed as a means of seeking to encourage more people to use public transport (and thus reduce carbon emissions and reduce traffic congestion), then we consider this to be seriously misguided. Except in very urban locations where there is ready availability of public transport (i.e. nowhere in Guildford except perhaps in the very centre of the town), it is unrealistic to think that restricting car parking space on new residential developments will result in lower car ownership. People need to use (and thus have) cars because of the 'requirements' of the society in which we all now live. If parking standards are reduced on new developments the new residents will simply park their cars on the streets either within the development or on adjoining residential roads thus cluttering up the environment and all to the inconvenience and detriment of both the new and existing residents (note the report in the Surrey Advertiser on experience at Boxgrove Gardens). In the Society's response to the Parking Strategy of the LTP3 03/11/10 it welcomed a minimum space allocation but no maximum . The key issue is to ensure that new developments provide sufficient parking to satisfy the anticipated demand and to ensure that there will be no need for vehicles to be parked on the adjacent streets.	We are not currently proposing a change to vehicle parking standards from those adopted in the SPD 2006. However, it is worth noting here that having no maximum standard leaves it to the market to decide how many parking spaces to provide, and therefore how much land to give over to parking. This may not be efficient use of land for housing development, having a negative impact on the environment by requiring more land to be developed.
Westborough, Broadacres & District Residents Association, David Bird, Chairman	(1) Accessibility of this Consultation. Whilst involvement is much appreciated, this exercise could have been made a lot more accessible and less time consuming to understand - far too links for example - making the whole almost impenetrable and certainly not an easy exercise to comprehend.	
John Twining, Chairman, Downsedge Residents' Association	Our response is largely based on our experience of planning, traffic and parking issues in the Downsedge area.	
Downsedge Residents' Association, John Twining, Chairman	The wording of the Related Objectives is too general to be useful. The more specific wording of the recommended 'Actions' in the 'Aspirations' document gives a better indication of what needs to be done.	The guidance refers to "objectives"
Keith Meldrum, Chairman, Merrow Residents' Association	We are content that the Scoping Report asks the correct questions and covers the ground extremely well so far as our Association members are concerned. We have also read the letter from the Downsedge Residents' Association and support their suggestions and recommendations.	

East Guildford Residents' Association (EGRA), Amanda Mullarkey	We ask for reference to be made to the agreed <u>definition of Sustainable Development</u> used in the National Planning Policy Framework. Reinstatement of the original definition has occurred since the drafting of the sustainability objectives of the SE Plan, as adapted for the Guildford Borough Council Core Strategy Further Options Sustainability Appraisal of May 2009. This is important because the reinstated definition recognises the importance of respect for <u>environmental limits and capacity</u> – concepts that will be important in considering acceptable housing and transport growth and acceptability of loss of irreplaceable assets such as valued environmental and cultural character.	It is useful for people reading the scoping report. I've added it into the early part of the scoping report.
East Guildford Residents' Association (EGRA), Amanda Mullarkey	The report should define sustainable development and summarise how GBC derived its proposed objectives. Indeed, we do not believe the consultation makes it sufficiently clear that, by adopting this report, GBC will be <u>formally agreeing sustainability objectives for Guildford</u> . We are asked to comment on the framework but it is not clear consultees are being asked to endorse the criteria.	Include a definition of sustainable development. However, these are NOT objectives for any formal document - the Local Plan will have its own objectives.
Top Real Estate Group, Martha Covell of Edwards Covell Architecture and Planning on behalf of	Top Real Estate Group has an interest in potential housing sites in Guildford Borough. The Scoping Report is required to establish the context for the sustainability appraisal of the emerging Local Plan. The Report brings up to date the baseline information from which future stages of appraisal will be made and helps to identify key sustainability issues for the area against which the emerging Local Plan options will be assessed. We welcome the updated baseline information contained in the Scoping Report and the illustrations of the 'likely future conditions' under each heading and the likely future spatial challenges that the Local Plan will need to address.	
Top Real Estate Group, Martha Covell of Edwards Covell Architecture and Planning on behalf of	The National Planning Policy Framework (NPPF) confirms the Governments view on what sustainable development means for the Planning System. It emphasises that the planning system should perform three roles, namely an economic role, a social role and an environmental role. The NPPF confirms that the implications for plan making are that local planning authorities should positively seek opportunities to meet the development needs of their area and that local plans should meet objectively assessed needs.	This NPPF definition of sustainable development has been included within the SA scoping report
Environment Agency, Katie Newton, Planning Officer	Groundwater Protection / Contaminated Land: The key objectives are laid out in SA Objective 3 - "To maintain and improve the water quality of the region's rivers and groundwater and to achieve sustainable water resources management". Should it say " <u>Borough's</u> rivers and groundwater"	Objective 15
Environment Agency, Katie Newton, Planning Officer	Although groundwater is mentioned in SA O3, there is no mention of it under Water Quality, which refers to rivers only. This should be rectified, especially as the Chalk and Lower Greensand aquifers not only store and transmit groundwater to rivers in the area but also provide a resource for drinking water supplies (e.g. Thames Water's pumping station at Ladymead in Guildford).	Objective 15
Environment Agency, Katie Newton, Planning Officer	Further information on our position statements regarding the protection of this valuable resource from both previously developed land and new development can be found in the revised GP3 document on our website - Groundwater Protection: Principles and Practice (GP3) . We suggest URS refer to this document.	referred to GP3 and updated text
Environment Agency, Katie Newton, Planning Officer	The Section in 14 : Water is out of date in a few respects: 1. Water Framework Directive - baseline characterisation data have been available since 2009 for most water bodies and water quality standards since 2010.	updated data from table
Environment Agency, Katie Newton, Planning Officer	2. Environmental Permitting Regs 2010 - These regulations have superseded the Groundwater Regulations 2009 in enforcing legislation to prevent the entry of hazardous substances to groundwater and limit the entry of non-hazardous pollutants (a WFD objective). Details of these recent changes can be found in GP3. EP Regs 2010 also control discharges of sewage effluent to ground in areas where there is no mains drainage, an important aspect for planners to understand, especially where greenfield development without access to foul sewerage is concerned and a new foul sewer may be required.	updated text to reflect changes
Environment Agency, Katie Newton, Planning Officer	As 3 separate issues (at least) are summarised in the SA document under Water , there is some confusion in the document (e.g. 14.3 under 'water quality') between:	
Environment Agency, Katie Newton, Planning Officer	a) flooding	
Environment Agency, Katie Newton, Planning Officer	b) groundwater quantity (resources)	
Environment Agency, Katie Newton, Planning Officer	c) water quality in rivers (and groundwater)	
Environment Agency, Katie Newton, Planning Officer	Please make the following additions to the Biodiversity section : - Green infrastructure needs to be included, including the need for a network of green corridors for the movement of species, especially with regard to migration due to climate change.	updated text to reflect comment
Environment Agency, Katie Newton, Planning Officer	- The importance of linear features such as watercourses and hedgerows needs to be included, which is related to green infrastructure.	updated text to reflect comment
Environment Agency, Katie Newton, Planning Officer	- Please add a specific section on the protection and enhancement of watercourses, which are important for many socio-economic reasons as well as for biodiversity, e.g. floodplain habitats to protect properties from flooding; source of drinking water; recreation, etc.	updated text to reflect comment
Environment Agency, Katie Newton, Planning Officer	- Non-native invasive species also need to be included, as these have significant biodiversity and socio-economic impacts.	
Environment Agency, Katie Newton, Planning Officer	Water Resources - The document has acknowledged the need for sustainability and the potential impact of future climate change. However this mainly relates to energy efficiency in homes, and we would recommend that this is also considered in terms of water efficiency in homes. On Page 51 under 'water' there is a list of ways to reduce green house gases, but nothing specifically on reducing the consumption of water. This should be considered, as the area is already water stressed and the future changes which have been acknowledged will add further pressure to scarce resources.	This section has been amended.
Environment Agency, Katie Newton, Planning Officer	Water Framework Directive - On page 59 there is a table with 3 surface water bodies and their WFD status. However there are significantly more water bodies within the area. The document should take into account that rivers, lakes, canals, and groundwater bodies are all protected under the WFD. The 2009 ecological status can be used as a baseline.	Table of these surface water bodies and their ecological quality is included.
Environment Agency, Katie Newton, Planning Officer	The water bodies and their 2009 ecological quality are as follows: Wey (Shalford to River Thames confluence at Weybridge); Cranleigh Waters; Wey (Tilford to Shalford); North Wey (Alton to Tilford); Tillingbourne; Clasford Brook and Wood Street Brook; East Clandon Stream; Hoe Stream (Normandy to Pirbright); Guileshill Brook; Stratford Brook; Hoe Stream (Pirbright to River Wey confluence at Woking); Wey Navigation (Pyrford reach); Addlestone Bourne (West End to Hale/Mill Bourne confluence at Mimbidge); Boldermere; Whitmoor Common Pond; The Tarn; Wey and Arun Canal; Basingstoke canal; Alton Upper Greensand; Godalming Lower Greensand; Farnborough Bagshot Beds; Chobham Bagshot Beds;	Table of these surface water bodies and their ecological quality is included.
Environment Agency, Katie Newton, Planning Officer	These water bodies fall within your boundary to varying degrees, and we would be happy to provide maps and or additional data about each if required.	
Environment Agency, Katie Newton, Planning Officer	These water bodies should be taken into account when planning future development, to ensure that there is no deterioration from their baseline Ecological Status.	
Guildford Environmental Forum, John Bannister	This is not an exhaustive response to the document but there are several points that we feel should be made. The report fails to demonstrate properly joined-up thinking on health, obesity, wellbeing, development, transport, traffic, access, air quality, noise and climate change. There is nothing in the report identifying the critical strategic objectives for Guildford that will address all of these issues holistically. This is a deficiency given Guildford's planned growth, costly traffic congestion, rising traffic and the reality of man-made global warming . The latter is starker now than it has ever been and in most respects alarmingly so. Far more people now accept that global warming is happening and that it presents the most serious threat we face. The SA must recognise this fact.	Scoping report includes a section on Climate Change
Guildford Environmental Forum, John Bannister	Sustainability: This word is used throughout the scoping report without a clear definition what it means. It is open to multiple interpretations. A definition that GEF accepts is "Improving the quality of life whilst living within the environmental capacity of the Earth". As we are currently not living within the environmental capacity of the Earth we must do nothing that increases our ecological footprint and actively adopt measures that reduce it. Failure to do so will completely undermine the plan and our futures. A measure of Guildford's ecological footprint and reduction targets are needed as well as a definition of sustainability.	Definition of sustainable development has now been included

Guildford and Waverley Friends of the Earth, Kathy Smyth	Over the years my group has responded to a considerably number of national government and local government consultations on a wide variety of topics so it has considerable experience in navigating consultation documents. Our first observation on this consultation relates to the poor layout and lack of clarity of the SA Scoping Report itself. In particular we found it difficult to identify the proposed SA Objectives 1-18 in the report. We would have expected these to be drawn together as a list in the main body of the report. They are not. To get an overview of the entire list of objectives, and to enable us to comment and provide responses to the letter of 11 December, we had to go through the document using the search facility and cut and paste the scattered references to the SA Objectives into one word document. Only then were we able to see that the entire list of SA Objectives. Subsequently we realised these are set out in Appendix 5 which is an entirely separate document on the website. It is not clear from the title that the Objectives are listed in this document and appendix 5 is not even referred to in the main report.	Agree. In response the layout will be revised to be clearer. Also suggest adding a sentence towards the end of para 1.4 of the scoping report "Points 5 and 6 area considered at the end of the report". The SA objectives can all be found in Table 19.1". Readers will then know where to find the list of SA objectives without having to read the whole document first. Figure 19.1 might be clearer to readers presented by objective number - with indicators, topics and issues alongside. Not clear what appendix 5 is - there was only one document consulted on.
Jennie Kyte	P.67 – Landscape – What are the Likely Future Conditions The last sentence would be stronger if it read: "It is therefore considered that those areas that are afforded protection through national designations should retain their character".	amended
Pirbright Parish Council, Lindsay Graham	We are conscious that there are a number of issues of concern to the community that merit consideration and, while we consider that the Sustainability Appraisal raises the broad range of issues that will be considered in the options assessed by the Borough Council, we are concerned that the inevitably general nature of the assessments will not reflect the specific issues that affect quality of life and the needs of the community at a local level.	Concerns relate to issues relevant to the Local Plan
English Heritage, Alan Byrne	Para 10.2 of the SA is limited in its understanding of the extent and significance of the historic environment of the borough and gives an un-supportable view that limited adverse impacts is likely to result from development in the borough. This goes beyond the remit of a scoping document which should identify the nature and extent of the potential impacts rather than attempt to make a poorly informed judgement on those impacts. It suggests a more robust evidence base is required and, once in place, that the contribution the heritage makes to the achievement of sustainable development is understood and reflected in the sustainability assessment.	No change recommended
Guildford Vision Group, Bill Stokoe	Poor access to document: First of all we note that the document is not easy to find on the Council's website. This does not befit a totally inclusive public engagement process. More worryingly, the 'Consultations' page of the Council's own website omits this particular document:	Apologies that it was not there. We had made arrangements for it to be displayed on that webpage
Guildford Vision Group, Bill Stokoe	Page ii) Concerns re URS caveats: We are concerned by the caveats placed by URS on the information and sources it has used, including a lack of responsibility for accuracy and verification. Due to the degree of reliance URS places on its terms of appointment, the appointment letter and any other relevant background information should be made public alongside the document itself. Presumably the copyright restrictions and the 'personal' nature of the report (as stipulated by URS) do not preclude its proper use by the Council's contractors, ratepayers and other people with an interest in Guildford.	This relates to commercial use, not academic or private use. The appointment letter and other contract paperwork is publically available on request
Guildford Vision Group, Bill Stokoe	It seems to us that the risk to Guildford Borough Council is having to repeat this process in full if anyone comes up with alternatives through the Local Plan process that were not included in the original brief. Thus, iteratively:	This consultation on the Scoping Report does not form part of the Local Plan - indeed there is no requirement for us to produce a scoping report as such.
Guildford Vision Group, Bill Stokoe	1) For consultation to be credible, participants need to be able to suggest alternatives not previously considered and the confidence that, where alternative suggestions are well-founded, they will be acted upon; 2) Alternatives cannot be incorporated into the plan without consultation and a SA/SEA; 3) The LPA needs to carry out consultation and a SA/SEA into alternatives; THEN 4) Return to step 1); 5) Repeat the process until all options have been exhausted. The establishment of a baseline before the public engagement has begun would seem to us to add extra steps, AND will inevitably delay completion of the process.	This is mixing the SA scoping report with the preparation of the Local Plan, starting at the stage of Regulation 18 - Issues and Options, which we are in the process of preparing for consultation. Reasonable alternatives are considered through the Sustainability Appraisal process, the framework of which is being established through this revised SA scoping report.
Guildford Vision Group, Bill Stokoe	If this consultation is to establish whether URS have captured the complete set of potential sustainability issues accurately, we would have to reserve judgement and the right under NPPF to have the opportunity to put forward views iteratively throughout the process. Therefore, in effect the baseline cannot be a baseline if it can be moved. Ergo, this exercise seems to us to be the first stage in a prescribed rather than consultative process. Hence our first point, starting at Page 1, at the beginning of this response.	The SA baseline can be changed and updated as preparation of the plan progresses
Guildford Vision Group, Bill Stokoe	The indicators and objectives put forward by URS seem fairly generic but they could impose a straitjacket on marginal development. It is important that these indicators and objectives are contextualised in the overall Sustainability Appraisal and that the Planning Policies in the Local Plan allow for some form of off-setting where developments cannot themselves achieve the standards recommended (for reasons of economic or physical constraints – such as operating in a Conservation Area or where infrastructure or economics do not permit it on site) and thus contribute to the overall carbon efficiency in other ways.	The consideration of alternatives against all SA objectives in a balanced way is what will help to achieve policies that can support sustainable development in the borough
Guildford Vision Group, Bill Stokoe	At 13.5, URS makes reference (SA Objective 7) to making the best use of previously developed land and existing buildings. Again, with reference to the Waitrose site, the use of town centre land for open air parking hardly seems to meet this objective and yet the precedent has been set.	This objective relates to using previously developed land before green land (all other things being equal)
Guildford Vision Group, Bill Stokoe	Water - Need to re-examine case for development in flood plain: This section on Water quality and rivers is largely outside the control of Guildford Borough Council.	Not everything in the SA scoping report, nor in the Local Plan must be within Guildford Borough Council's control to its Local Plan to have an affect on it.
Guildford Vision Group, Bill Stokoe	The indicators and objectives with regard to homes and water are too negative and must surely have regard to the other objectives in the Scoping report.	
Guildford Vision Group, Bill Stokoe	This section on Biodiversity is largely outside the control of Guildford Borough Council, other than to identify the areas which need to be protected and formulating the relevant policies to achieve this.	
Guildford Vision Group, Bill Stokoe	Landscape - Development should enhance and exploit Guildford's setting: This section is important for its context for existing and potential future development. Whilst wishing to retain and enhance the landscape, there needs to be a careful fresh look at the views that currently exist and those that could be created in the context of urban development in Guildford.	
Guildford Vision Group, Bill Stokoe	Waste - Management of waste should feature in new development: Broadly this section is fairly comprehensive and reflects activities of other departments within Guildford Borough Council.	
Guildford Vision Group, Bill Stokoe	Sustainability Appraisal Methodology - Scoping process & Assessments must accommodate outcomes of Local Plan consultation: The second paragraph of this section highlights the points we made above (referring to Page 1 of the URS report).	
Guildford Vision Group, Bill Stokoe	A number of key issues have been either understated or omitted, especially around traffic & transportation: The only data gap identified by URS relates to Tourism.	

Comments received that are not relevant to the SA Scoping Report but are relevant to the SA Report or to the Local Plan Strategy.	
Name	Response
Gordon Bridger	MAJOR PLANNING ISSUES - Better access to Heathrow airport by rail. Expansion of University and research park into Green Belt. Improving traffic access to A3. Better access to town centre. More housing adjoining University and Research Park for specialist staff and University students – if required in adjoining Green Belt. Development of a “village” to attract a cluster of science trained entrepreneurs adjoining the Research Park. More housing for students and researchers. Support where necessary for improved educational facilities. Support for medical research and facilities. Road and pedestrian bridge over the railway to ease traffic flow on the existing town bridge. Helicopter facility close to Research Park.
Gordon Bridger	TOWN CENTRE PLANNING ISSUES Need to minimize traffic problems – avoiding new massive shopping malls. Quality housing in the town centre which would fund affordable housing closer to work places outside town centre. Car usage by residents would not cause congestion problems and could be restricted to small vehicles or shared vehicles.
Gordon Bridger	Existing undeveloped areas of Bellerby and North St. to be planned comprehensively with a high proportion of housing and community facilities, pedestrian areas and links to them. New retail development should be COMPLIMENTARY to the High Street and not COMPETITIVE. This would mean making it a “secondary shopping area” with smaller shops(like Godalming.).Create a “village” type environment which would attract quality developers – not great shopping mall investors. Provide underground car parks (contrary to official views these should and could be economic) – Bright Hill an ideal choice. Offer Debenhams a better town centre site and convert current building to residential. Introduce a shopper bus, repair setts, improve pavements. Better route to rail station. Retain central location for bus station.
Gordon Bridger	CONCLUSIONS The above strategy requires a radical reconsideration of current thinking which is based upon making the town centre a much larger retail focus. If implemented this would exacerbate an already over congested traffic system and undermine the financial viability of shops in Guildford’s prime attraction – the High Street. Developments along North Street should seek to compliment the High Street not compete with it. High quality housing, for which there is a great demand, would facilitate funding of “affordable” housing in other areas.
Gordon Bridger	Fortunately the economic future of Guildford does not lie in the over crowded town centre but in its dynamic knowledge and information led services developed around the University and the Research Park. Adopting the outline of this strategy it should be possible to prepare a plan within a reasonable time limit, at reasonable cost, to provide proposals which would preserve Guildford’s attractive legacy and allow for better economic future.
Gordon Bridger	Thoughts on planning Guildford : a new plan for Guildford - Guildford needs a comprehensive plan which needs to be founded on a sound economic base and appropriate economic policies if economic development is the objective.
Gordon Bridger	Guildford’s economic success has been due to: 1 Location, 2 Skilled labour force, 3 Excellent education system, 4 Attractive environment.
Gordon Bridger	An economic analysis of Guildford in 2009 establishes that knowledge based services account for around 31% of GVA, public services 25%, retail 15%, (town centre 10%) manufacturing 10%.
Gordon Bridger	Future growth location thus outside town centre- based on high quality services and highly qualified entrepreneurial staff.(they generate a demand for quality retail facilities).Investors now NOT considering Guildford because of huge costs of staff housing and traffic congestion,
Gordon Bridger	Create Guildford as a centre of technical excellence (Silicon valley of the south) around UNIS who own considerable acreage capable of development but currently in the Greenbelt.
Gordon Bridger	Allow careful development of Green Belt when it is not an “area of outstanding national beauty, when it does not create urban cramming, and when its development would be in the national interest “. This would apply to the land west of UNIS adjoining the Research Park.
Gordon Bridger	Guildford -Main problem – traffic congestion. This is already discouraging investors. No easy solution. Policy in short run should be to minimize congestion creating investments.(e.g. offices in town centre and shops requiring car access). Main need – affordable housing for skilled staff with families. Quality apartments for asset rich elderly could be located in town centre and help fund affordable houses on new Science Park. Town Centre development. Highest priority should be given to housing – which could be very profitable to investors. Their car use would be minimal and restricted to communal use or small cars (They would fund affordable houses based around the Research Park).
Gordon Bridger	Retail development should seek to complement the High Street not undermine it by proving a secondary level of shopping with a variety of shops (not new great universal shopping mall).The current forecasts of retail need were estimated many years ago long before the current recession and the revolution in internet shopping and need drastic downward revision. The North st development area should seek a mix of social, communal, housing and retail facilities which should improve the environmental factors which make Guildford a quality town centre. All that gets a mention is Tourism, which merits several pages of data. Why? Tourism is one of the least economically important sectors.
Gordon Bridger	There should be a section on employment requirements which brings out that priority needs to be given to high productivity skilled workers who will attract high value services with a maximum multiplier effect on the economy. Retail employment is low skilled, low multiplier effect, high propensity to import and a lot merely substitutes one retail facility for another. There is no understanding of the Guildford economy in this report.
Westborough, Broadacres & District Residents Association, David Bird, Chairman	The site in Westborough (aka the Aldershot Road Allotment Site) appears in the 2003 Local Plan under Policy H3 as “Woodside Road” allotments and is designated a housing development site for which planning permission will be given. Our policy recommendation is to scrap Policy H3 in its entirety - this could easily be accomplished within GBC now (without a further 2013 consultation) and would simply follow the results of the 2008 Site Allocations Consultation. No-one wants Housing on this land - everyone locally wants Allotments and Open Space.

Gordon Bridger	As Mayor in 2003/4 my theme was " Guildford – a centre of world excellence". This led to a series of lectures organized with the help of Surrey University, on the many often little known successful enterprises in the Borough. Not only did these include achievements in satellite technology, but in information technology, medical science, vehicle production, psychology and economics. The extent and importance of these enterprises have subsequently been emphasized and measured in an excellent report by Surrey University " Guildford Economic Development Study ' 2009. This report presents a unique economic portrait of the Borough and its content should be the foundations upon which plans for the future of the Borough are built.
Gordon Bridger	What emerges from this valuable report is that the really important economic sectors on which we depend is not the retail sector but the provision of high value labour enterprises heavily focused on science and technology of the sort which the University and its research park are providing. What these figures revealed, which was surprising to many, was that retail development (this definition includes distribution, hotels and restaurants) only contributed around 15% of Gross Value Added to the Guildford economy – the town centre 10%.
Gordon Bridger	These new start up enterprises led by young energetic well trained individuals gather in clusters where they can interact upon each other and they need a stimulating environment , skilled staff and housing they can afford. A recent "Economist" magazine report stresses how there has been a move from overcrowded expensive Silicon Valley to other parts of the world including, London by these pioneering entrepreneurs. Cambridge has recently found funds for a huge increase in its science led development and Guildford which has a nucleus of outstanding young scientists and a highly successful research park needs to build on these achievements
Gordon Bridger	The economic future of the Borough, indeed of Britain, lies in the development of these services rather than the provision of more shops which depend heavily on imported goods and low value labour . This does not mean that improvements to our retail facilities should not be encouraged but that the argument that the Borough's economy would be severely undermined if we did not massively increase its retail sector is without substance.
Gordon Bridger	Guildford's economic future lies in promoting these new technologies, and new enterprises . With its splendid location, its trained staff and University , as well as an attractive environment , Guildford is well placed to do this.
Gordon Bridger	RETAIL DEVELOPMENT has an important part to play in attracting development and the town centre, with one of the best High Streets in southern England (BBC poll) provides what is becoming increasingly important to prosperous and discerning shoppers - a quality shopping environment. However, this quality imposes restrictions on development of the centre due to the town's topography. The north downs and the river severely constrain access and the road pattern is a serious constraint to further expansion in the town centre.
Gordon Bridger	Further expansion of development in the town centre will only exacerbate an already serious traffic problem. It is impossible to visualize any realistic solution to the congestion problem in the foreseeable future. A tunnel is a technical possibility but the costs are unlikely to be fundable, while a bypass would be equally expensive and open to much opposition.
Gordon Bridger	It is not the purpose of this brief report to prepare a plan for the Borough, which needs assistance from many experts, but in order to emphasize the breadth of expertise required and the issues needing consideration . The following ideas, amongst others, should be given serious consideration in preparing a plan for the Borough.
Gordon Bridger	Redevelopment of the railway station though limiting high rise over it to a maximum of 2 or 3 stories in order to prevent this area being overwhelmed by out of scale buildings (need to avoid the error allowed in 1960's of the two high rise blocks of flats adjoining the railway).
Gordon Bridger	Retail development gets a fair amount of attention though it is not mentioned that together with distributive and retail activities it only accounts for 15% of GVA (10% in the Centre). There is a long section about the Town Centre as if it were the focal point of economic growth. It no longer is and this needs recognition by planners. No mention is made of the Cushmore Wakefield report produced in 2006 (yes 2006) which forecasts an absurd out of date growth rate of 3.3% for comparison shopping for the next 16 years, and in another section recommends that Guildford in order to compete with other town centres must offer 60,000 sm of retail space. Surely the amount and type of retail should have been included in this report ? . It should also have provided statistics of existing uses.
Gordon Bridger	In Heritage it needs to be made much clearer that Guildford town centre if it is to be an economic and social success needs to RETAIN and improve its history and heritage and to develop the North St area as another "Woking "Peacock Centre would be not only a financial disaster for the shops in the High Street but would not attract shoppers from areas where similar more accessible malls exist. Why should any shopper want to come to a congested town centre which is identical to all others ?
John Rigg	Disappointing after earlier plans with so many of the same failings identified previously. I must be missing something. It should be just as easy to reach the right conclusions to serve the community well. Perhaps in the new environment we can meet and explore with our officers some of these points rather than produce another detailed response to no affect. There may be good reasons and it would be good to understand the officers thinking.
Westborough, Broadacres & District Residents Association, David Bird, Chairman	Garden Grabbing & GBC Planning Committee. One of WBDRA's main concerns for the parishes of Westborough and Worplesdon (our catchment area) is the slow attrition of loss of open space due to garden grabbing which continues unabated recently with ill-designed extensions being approved by the Planning Committee. No-one seems to pay any heed to the water run-off problem which is exacerbated by concreting over gardens and designed-in open spaces. Whither our garden wildlife too? The over-riding consideration at Planning Committee seems to be the cost of an appeal should they refuse it. Hardly a strategy for the Borough's future residents or the overall concept of Sustainability.
Westborough, Broadacres & District Residents Association, David Bird, Chairman	Our final question to GBC Planning is this: is anyone at Millmead listening to what people want or is there an Executive agenda which overrules us all?

Gordon Bridger	Surprisingly the UNIS report fails to mention the need for an appealing environment as a factor important in attracting development. But it is not just a question of a physical environment but also of good social one: schools, a good University and excellent medical facilities, these are essential for success in a modern society. Fortunately they exist already but need to be given all practicable support to improve.
Gordon Bridger	Proposals therefore which envisage as much as 60,000 sm of more retail development in the town centre (anything between a 50% and 100% increase on existing retail ,depending on differing basic data) would create massive traffic problems and could cause very serious financial problems for existing retail enterprises, particularly those in the High Street.
Gordon Bridger	The plans for such a massive retail development were drawn up by retail consultants whose forecasts of increases sales of 3.3% per annum are now quite unrealistic and their principal justification for such an expansion was that all other competing centres in the region have expanded hugely over the last two or three decades, which Guildford has not, and therefore Guildford needs to do the same if it is to retain its competitive edge.
Gordon Bridger	What this recommendation ignores is that Guildford does not have is the ease of physical expansion which other competing centres have. However it does have the advantages of a much more attractive setting which makes it a much better quality shopping centre. The appropriate policy would be to IMPROVE the quality of the town centre rather than the quantum of shopping. Massive new shopping malls are neither desirable or economically necessary.
Gordon Bridger	Guildford should easily be able to hold its own if it concentrates on a QUALITATIVE retail environment and does not seek to expand into just another great shopping mall. The ample areas available for development off North Street should COMPLEMENT the High Street area giving priority to badly needed town centre housing, improved community facilities and SECONDARY retail development, turning it into an attractive semi -pedestrianised environment with easy access to the High Street. It should be possible to build this into an environment which people would enjoy visiting.(The plans produced by Michel Harper and John Nightingale about 1990 for Bridge Street had some excellent ideas which might be copied).
Gordon Bridger	PLANNING FOR THE FUTURE Planning at local Government level is all to do with physical and environmental planning , not economic planning , but if it is to be effective must be built upon by an effective economic policy. To be able to do this plans need to take into account developments over the whole Borough and to be made by planners with a comprehensive outlook and responsibility. Too much in the past has been left to specialist consultants taking too restricted a view of the Borough with immediate financial gain the main objective.
Keith Brian Chesterton	I think this is important but your letter is so dry & uninformative as to what this is about that most people's initial reaction will be to ignore it. Indeed I have had intelligent people concerned about Guildford do exactly that. Could you please send this out without the bureaucratic language & explain in plain English what it is about & why we should be interested.
Jim Allen	Perhaps it would be good to finalise one public consultation which ended in November before taking on another!
Jim Allen	This document is either "8 years too late" or "one year too early" if census figures are to be used as the basis for any report.
Guildford Group of the Ramblers Association, Keith Brian Chesterton	NPPF para 34 has one criterion for new development that Major developments should take place where the use of sustainable transport modes can be maximised.
East Guildford Residents' Association (EGRA), Amanda Mullarkey	We propose that ' <u>Aspirations for Guildford 2012</u> ' by Guildford Residents' Associations be included in the Sustainability Appraisal scoping and objectives. This document represents the views of a considerable body of the community which merits consideration in an era of localism and is very relevant to sustainable development.
East Guildford Residents' Association (EGRA), Amanda Mullarkey	The <u>population assessment is weak and inadequate</u> as a basis for decisions on growth and associated issues such as homes, transport, services and environmental pressure. A physically constrained gap town encircled by Metropolitan Green Belt needs <u>much better data on population and links with surrounding settlements</u> in order to make informed decisions on sustainable growth. The projection that population in the Borough will increase to 162,000 due to longer life expectancy and immigration does not allow assessment of assumptions in this projection, the degree of inaccuracy or likely impact of significant economic changes. Adaptive planning that considers a range of scenarios may be more appropriate.
East Guildford Residents' Association (EGRA), Amanda Mullarkey	The <u>student population should be an identified subset</u> . Only if this group is separated can the age profile of the town be understood for planning purposes. This has especially important consequences for decisions on housing need linked to sustainable development.
East Guildford Residents' Association (EGRA), Amanda Mullarkey	It is essential to be able to understand the proportion of the off campus housing stock occupied by students. For example, providing more student accommodation on campus could be a very sustainable way to free up considerable housing stock in the town.

<p>East Guildford Residents' Association (EGRA), Amanda Mullarkey</p>	<p>The <u>housing assessment data do not provide a sound basis</u> for developing sustainable policies. Demand should be considered alongside capacity, as undertaken by Surrey County Council, and within the context of need and the complex web of links with surrounding settlements. Many commute to and from Guildford and this should be better captured. Due to geographical and locational factors, housing demand in Guildford will never be met. In spite of its dense population and the challenges, Surrey has a good reputation for meeting its housing targets. Making sound decisions for Guildford will require a more careful analysis than the methodology in the West Surrey Strategic Housing Market Assessment that groups three areas with very distinctive characteristics: Guildford, Woking and Waverley. We have no confidence in this report. <u>Robust data are required to inform what will always be difficult judgments based on need, taking account of links, and capacity.</u> The proposed methodology is too crude to inform sustainable development.</p>
<p>East Guildford Residents' Association (EGRA), Amanda Mullarkey</p>	<p>- We need to know how many cars are owned so that <u>off street provision</u> can be made for vehicles. GBC's landscape consultant advised on-street vehicles were the most significant negative landscape feature of Guildford. Lack of space for cars affects the economy and quality of life.</p>
<p>East Guildford Residents' Association (EGRA), Amanda Mullarkey</p>	<p>- We need to know how much cars are used. In the interests of sustainable development we should be <u>promoting attractive alternatives to car use</u> (buses, cycling, walking, local trains) and seeking to manage down the occasions when cars are relied upon. This makes it important to <u>track use of alternatives to the car by residents as well as visitors and makes tracking use of park and ride alone an inadequate measure.</u></p>
<p>East Guildford Residents' Association (EGRA), Amanda Mullarkey</p>	<p>Care needs to be taken to ensure valued residential character is not lost as a result of pressure to make efficient use of previously developed land. A balance needs to be struck between sustainability objectives. Wise <u>use of previously developed land should involve sensitive site by site decisions on density rather than misguided mantras</u> such as "high density is sustainable here because it is central, close to a bus stop/station or is previously developed land". It may well be the case but achieving sustainable development requires balanced judgments.</p>
<p>East Guildford Residents' Association (EGRA), Amanda Mullarkey</p>	<p>The report seems to focus on the need for cars in villages and on public transport for visitors coming in from outside but <u>does not do enough to promote making alternatives to the car attractive</u> for residents and businesses within Guildford.</p>
<p>East Guildford Residents' Association (EGRA), Amanda Mullarkey</p>	<p>Access and connectivity are issues. The A3 divides the town. <u>Guildford is a split community</u> and this is not good for cohesion and inclusiveness. There is a need for additional crossings of the river and railway to unite the town and to reduce congestion and pollution. There is also a need for a clean, modern state of the art bus interchange to improve connectivity.</p>
<p>East Guildford Residents' Association (EGRA), Amanda Mullarkey</p>	<p>This policy should capture the reference to accessibility in objective 8 of the SE Plan. This would pick up the helpful references to promoting access and accessibility as set out in the NPPF. This has links to transport policy and to the new thinking on functioning of sites in the NPPF. It can also pick up the fact Guildford is a divided town.</p>
<p>East Guildford Residents' Association (EGRA), Amanda Mullarkey</p>	<p>We ask for the following Sustainability Objectives to be added: ADD: To enable planned and phased provision of infrastructure and services including appropriate communications technology. ADD: To adopt a long term and strategic approach to planning including, as necessary, phased delivery and readiness to tackle major challenges and inherited mistakes. Sustainable development requires a longer perspective and making things better rather than handing on problems to the next generation. This should be captured in the objectives.</p>
<p>Top Real Estate Group, Martha Covell of Edwards Covell Architecture and Planning on behalf of</p>	<p>The National Planning Policy Framework (NPPF) outlines the core principles that underpin plan-making and decision taking. These include the need for the planning system to be "genuinely plan-led"; and, "not simply about scrutiny, but instead be a creative exercise in finding ways to enhance and improve places in which people live their lives". We welcome these principles.</p>
<p>Top Real Estate Group, Martha Covell of Edwards Covell Architecture and Planning on behalf of</p>	<p>NPPF para 165 states "A sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors". We welcome SA as an aid to decision making but only if it is undertaken in a thoughtful and objective way.</p>
<p>Top Real Estate Group, Martha Covell of Edwards Covell Architecture and Planning on behalf of</p>	<p>Securing policies to meet these unmet housing needs are likely to be the biggest challenge and, with insufficient land supply in urban areas, this will be further exacerbated by the predominately rural nature of the Borough and the existing constraining nature of Green Belt designation which 'washes over' much of it. As the report by the Rural Coalition confirmed: "Living in the countryside is a popular choice for many, including those who do not work in the local economy of rural communities. This migratory trend has social, environmental and economic implications – not least that, as increasing numbers made the choice to move from urban to rural communities, with limited housing supply, house prices in many rural settlements are pushed even further beyond the means of local people. The stock of affordable homes in rural areas has historically been proportionately lower than in urban areas."</p>
<p>Top Real Estate Group, Martha Covell of Edwards Covell Architecture and Planning on behalf of</p>	<p>Accessibility analysis of sites should not end at the local authority border. Communities living at the edge of the Borough will regularly access services and facilities in a neighbouring authority's area. The site appraisal criteria should take this into account.</p>

Top Real Estate Group, Martha Covell of Edwards Covell Architecture and Planning on behalf of	In relation to Housing, Table 19.1 concludes that housing will be a key focus of the sustainability appraisal process, and we support this. The Report outlines three specific issues, which the SA intends to take forward: a. High average house prices create affordability problems for local people, first time buyers and essential key workers. b. There is a deficit in affordable housing supply and the current completion rate is below the annual level required to address the deficit. c. The need for accommodation for people with care and support needs is likely to increase, given the projected increases in population and the proportion of older people in the Borough.
East Guildford Residents' Association (EGRA), Amanda Mullarkey	The economic analysis fails to tackle some major issues. It looks at tourism and gives a <u>very outdated overview of retail based on unrealistic growth projections</u> . It pays <u>inadequate attention to the exciting scope for attracting new high tech, medical and creative technologies</u> . What will the <u>impact of home working</u> be? Can technology <u>reduce demand for domestic and international travel</u> ? What of <u>economic resilience</u> ? Should we be <u>diversifying our town centre</u> ? What about linkages between business sites? What will be the impact of growth on established businesses and traffic?
Environment Agency, Katie Newton, Planning Officer	- Please add the need for undeveloped buffer zones to watercourses - a minimum of 8m from the bank top of a main river and 5m from an ordinary watercourse.
Environment Agency, Katie Newton, Planning Officer	We advise that future developments should set a water efficiency standard for new homes of 105 litres/head/day (l/h/d), equivalent to levels 3 and 4 for water, within the Code for Sustainable Homes (CFSH). Meeting levels 3 and 4 for water efficiency will help ensure that water resources in the area can continue to be used in a sustainable way.
Environment Agency, Katie Newton, Planning Officer	Achieving a water efficiency standard of 105l/h/d within new homes can be accomplished at very little extra cost (under £125 extra per home) and typically only involves low/dual flush toilets, low flow/aerated taps and showerheads and efficient appliances (dishwasher and washing machines) and does not require more expensive rain or grey water technologies. This would also contribute to achieving the targets of water consumption set out by DEFRA, of 130 l/h/d by 2030.
Guildford Environmental Forum, John Bannister	Climate: A metric is needed to reduce GHG emissions in Guildford in line with the Climate Change Act. The Local Plan is not a plan for what GBC deem to be within their remit to manage alone, it is a plan shared by all stakeholders. Given the scale of developments planned in central Guildford energy efficient schemes such as strategically located tri-generation hubs fuelled by biomass linking to high-energy-demand buildings can play an important role. The technology is well established and one that the planning system can deliver. The time for tinkering has passed. On the CO2/capita data presented we have to remember that 2009 was the beginning of a deep recession. There is great scope to increase the take-up of solar PV, which needs active encouragement.
Guildford Environmental Forum, John Bannister	Rural Economy: The report provides very little new thinking on our rural economy. Food security is not addressed. Only a very tiny proportion of food consumed in Guildford comes from Surrey. Guildford's farmers market attests to this fact. Given the importance now attached to food security a metric is needed to increase locally grown food in our shops.
Burpham Community Association, Liz Critchfield, Secretary	The Borough population is predicted to rise from 137,200 (2012) to 162,000 by 2035. We are concerned that this may give rise to a target used to vindicate a considerable increase in housing with a likely concomitant loss of Green Belt. We feel the projected population increase requires further explanation and justification.
Abbotswood Residents Association - Central Crescent (ARA-CC), Graham Hibbert	We are unsure if there is a policy to improve the interconnectedness of the town centre, the university, hospital and the science park, and if not believe one should be introduced, as we do believe that this should be an objective of the Local Plan.
Guildford and Waverley Friends of the Earth, Kathy Smyth	There should be a strategy to increase areas of woodland in active and sustainable management.
Guildford and Waverley Friends of the Earth, Kathy Smyth	We are concerned by the absence of any criteria directly relating to the ability of any site to support renewable energy. We do not regard this as an issue for larger commercial sites which will probably have a range of technologies available to them, but for smaller housing sites, which rely primarily on solar panels, their aspect and orientation and other elements like overshadowing, can be crucial. We suggest the adoption of criteria which identify obstacles to the generation of renewable energy for smaller residential sites. These could include aspect – north facing hillsides will generally not support the generation of solar energy.
Jennie Kyte	P.42 – Cultural Heritage As well as historic assets, the setting and wider landscape and views in which historic assets are set are enormously important – and all landscapes which contribute to the character of Guildford.
Jennie Kyte	Population The South East is one of the most populated areas in Europe and its villages are consequently very close together. Perhaps this needs mentioning as there is a limit to the amount of increase in population that the South East can take without risking its towns and villages merging into each other, which would damage the attractiveness of the area as a place to live and work.
Jennie Kyte	The diverse character of Open Spaces in Guildford also needs protecting, as well as the Open Spaces themselves.
Pirbright Parish Council, Lindsay Graham	Thank you for consulting Pirbright Parish Council over the above consultation. Our members welcome the opportunity to comment and would wish to discuss with officers the implications of the Local Plan Review for Pirbright Parish. We are conscious that there are a number of issues of concern to the community that merit consideration and, while we consider that the Sustainability Appraisal raises the broad range of issues that will be considered in the options assessed by the Borough Council, we are concerned that the inevitably general nature of the assessments will not reflect the specific issues that affect quality of life and the needs of the community at a local level.

Pirbright Parish Council, Lindsay Graham	In particular, Pirbright benefits from its Conservation Area, the protection afforded by the surrounding Green Belt and the large areas of heathland and woodland that contribute greatly to its setting and character. At the same time, it suffers from perhaps inevitable pressures from traffic (volume, speed/safety and congestion), development pressures and encroachment of Green Belt by development (some authorised some unlawful). We fear that the one size fits all approach to the SA and rather general weighting that such issues are given in the document does not get to the detail of how a village community like Pirbright can be protected while, at the same time, being allowed to renew and maintain its vitality, facilities and infrastructure.
Pirbright Parish Council, Lindsay Graham	A great deal depends on how these issues will be dealt with in terms of the location of development, the approach to the protection of the villages and other constraints and we would welcome a meeting with officers to help us respond in due course to further consultation and consider the options available.
Guildford Vision Group, Bill Stokoe	It seems to us that there are two fundamental issues with the Scoping report itself: Firstly, in the absence of a clear long term vision or set of aspirations, the scoping document risks being a self-limiting, circular argument. It aims to help define a structure to deliver the limited goals provided by the planning authority, with particular reference to previous documents. It overplays previous 'consultations', without enabling a full-scale dialogue with Guildford's residents and stakeholders (both Borough and Town). It presupposes what the evidence pack will look like, based on the disjointed and outdated Evidence Base that currently exists. Thus, to a great extent, it seems to encourage the kind of short-sighted view we believe has been too prevalent for too many years. If GBC simply expects nothing much, this document surely provides a framework to deliver nothing much. We are concerned how this approach might adversely impact the formulation of the new Local Plan.
Guildford Vision Group, Bill Stokoe	Key Point: There must be an explicit recognition that, whilst the Scoping Report may be a start of the process, it must be a living document and be capable of radical adaptation to whatever are the outcomes of a proper and wide-reaching dialogue with the Town and Borough, in line with the Council's own policy on Community Engagement, leading to the new Local Plan.
Guildford Vision Group, Bill Stokoe	Secondly, within the 83 pages and the 12 sets of accompanying documents, a large proportion of the subject matter and content is outside the reach and influence of Guildford Borough Council (Guildford not being a unitary authority). Furthermore, while the document itself is not intended to determine Council policy, it is likely to form the basis upon which policy is developed. Consequently, the large proportion of the sustainability criteria is beyond the scope of Guildford Borough Council to deliver. As a result, the Scoping Document risks creating a straitjacket in which Guildford is fundamentally unable to deliver the kind of holistic and radical solutions GVG has been calling for.
Guildford Vision Group, Bill Stokoe	We would note that the shortcomings we have identified in general above are a tangible indication of the complexity involved in trying to make previous local planning policy frameworks fit within the National Planning Policy Framework (NPPF). We have argued (and will continue to contend) that what is required – in particular as it relates to Guildford Town Centre – is a fresh approach with ambitious aims. These should pick up on the positive directions from the NPPF such as are highlighted by URS, but from a perspective of enabling key infrastructure improvements through development – in particular in Paragraph 21 of NPPF where it says, <i>inter alia</i> : to "identify priority areas for ... infrastructure provision ..."
Guildford Vision Group, Bill Stokoe	Page 1) Scoping Assessment no substitute for proper public engagement re Local Plan on collective vision: URS make the establishment of the Scoping Assessment the first stage in the process of preparing the Local Plan.
Guildford Vision Group, Bill Stokoe	<i>More clarity re public transport service needs:</i> We are aware that there are major issues in terms of Guildford as a transportation hub – the bus station may be relocated or dispensed with, the station may be redeveloped, but overall, it is unclear that Guildford knows what level of service it needs to provide to support passengers and to ensure a sustainable and connected public transport infrastructure can be designed into the Local Plan policies.
Guildford Vision Group, Bill Stokoe	<i>Traffic No.1 Priority:</i> Traffic is the major issue that prevents solutions to other problems and limits the ability to improve communities and, in particular, Guildford Town Centre. This is noted as a problem of 'Congestion' in the Scoping Document and yet the problem is much more deep-seated. The major pinch-points in the traffic network are typically governed by River(s), Rail and Major Trunk Road(s), a number with old, restrictive structures unsuited to handling modern traffic at key locations.
Guildford Vision Group, Bill Stokoe	As examples, we list below the crossings over the River Wey in Guildford between Shalford and Burpham and the railway – mainline only – between Peasmarsh and Stoughton:
Guildford Vision Group, Bill Stokoe	River Wey <ul style="list-style-type: none"> • A248 (Shalford) – restricted crossing with a bridge on a right-angle bend; • Millmead (pedestrian) • Old Town Bridge/High Street (pedestrian) • Onslow Street (four lanes, Gyratory – no pedestrians) • Bridge Street (three lanes, Gyratory – narrow pavements) • Bedford Road (pedestrian) • A25 – Woodbridge Road (four lanes, Guildford By-pass) – tow path disappears under the bridges • A3 (through route with no access onto the road southbound after Ripley and no exit northbound after the Dennis Roundabout intersection) • A320 – Woking Road (after the river has turned 90 degrees) • Clay Lane, Burpham

<p>Guildford Vision Group, Bill Stokoe</p>	<p>Mainline Railway</p> <ul style="list-style-type: none"> • B3000 – New Pond Road • A3100 – Portsmouth Road (crossing from East to West) • A3100 – Portsmouth Road (crossing from West to East above tunnel) • Mount Pleasant (restricted road crossing over tunnel) • The Mount (no-through road crossing over tunnel) • A31 – Farnham Road Bridge (limited weight bridge erected in the 1850's before cars had been invented and before the Western suburbs of Guildford, the Hospital, Cathedral, University, etc., were developed) • Station (pedestrian – restricted access) • University (pedestrian) • A25 – Woodbridge Road (four lanes, Guildford by-pass) – tow path disappears under the bridges • A3 (through route with no access onto the road southbound after Ripley and no exit northbound after the Dennis Roundabout intersection) • Stoughton Road (restricted access – single carriageway) • Salt Box Road
<p>Guildford Vision Group, Bill Stokoe</p>	<p>Any intention to pedestrianize Bridge Street and create comfortable, safe pedestrian and cycle ways between the Station and the High Street will require a major rethinking of the traffic flows – especially through-traffic forced through the Gap town by poor long-term regional infrastructure.</p>
<p>Guildford Vision Group, Bill Stokoe</p>	<p>This does not seem consistent with NPPF (155) which says: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses are essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”</p>
<p>Guildford Vision Group, Bill Stokoe</p>	<p>Page 6) Guildford needs longterm solutions, not sticking plasters re congestion vs development: The fourth bullet point refers to whether “the problems [are] reversible or irreversible, permanent or temporary”. In terms of specific long-dated issues of congestion in the centre of town, these can be resolved. However, the key issue is whether the Local Plan will accommodate opportunities for permanent solutions or will advocate ‘sticking plaster’ to reduce the impacts.</p>
<p>Guildford Vision Group, Bill Stokoe</p>	<p><i>Longterm economic growth requires appropriate housing supply:</i> It is reasonable to assume there is little Guildford Borough Council can do to manage population growth. However the shortage of housing will be a major feature – referred to later – and it is clear that the use of prime town centre housing land for supermarkets will prove to be inappropriate. This is especially so when the only alternative to accommodate an increase in households will be to eat into the green Belt.</p>
<p>Guildford Vision Group, Bill Stokoe</p>	<p>Section 5 – Health - Concern re adequacy of health care infrastructure and exposure to congestion-related health issues: It is reasonable to assume there is little Guildford Borough Council can do with regard to healthcare facilities. Having said that, we note the comment at the top of page 13 to the effect that despite there being an adequate number of GPs, their surgeries are operating at capacity.</p>
<p>Guildford Vision Group, Bill Stokoe</p>	<p>Provision of suitable facilities for GPs could be a part of the planning process for major residential schemes and could be influenced by the Local Plan; having said that, the issues and indicators at section 5.3 do not refer to this problem, and the need to provide sufficient GP surgery space does not feature as an objective.</p>
<p>Guildford Vision Group, Bill Stokoe</p>	<p>This is an example of a general tendency for the document, in our view, to fail to reach emphatic and forward-thinking conclusions – often simply providing undeniable platitudes.</p>
<p>Guildford Vision Group, Bill Stokoe</p>	<p>URS also note from Paragraph 26 of the NPPF that “local planning authorities should require an impact assessment if the development is over a proportionate, locally-set floorspace threshold (if there is no locally set threshold, the default threshold is 2,500 sq m). We think that, for the protection of Guildford's town centre, this threshold should be set at no more than 1,500 square metres. Any greater amount and edge of centre sites could affect the ability to deliver the regeneration of the North street site.</p>
<p>Guildford Vision Group, Bill Stokoe</p>	<p>It is of paramount importance, in this context, that the poor road connections (both locally and regionally) to these facilities (and the nearby Royal Surrey County Hospital) are taken into account – especially recognising the shortcomings of the single bridge connection from the town (built before the motor car was even invented).</p>
<p>Guildford Vision Group, Bill Stokoe</p>	<p>There should be objectives to improve the A3 junctions and to improve the crossings over the mainline railway from the town to the West.</p>
<p>Guildford Vision Group, Bill Stokoe</p>	<p>Recognising the focus of employment and GVA in three wards (namely, Holy Trinity, Friary & St Nicholas and Onslow) means that a greater emphasis should be given to engaging with these three wards to ensure the burden on these areas is not too great. This should have been done in advance of the Scoping document to ensure the consequences of any increase in economic activity can be mitigated in some pre-planned way.</p>
<p>Guildford Vision Group, Bill Stokoe</p>	<p>In the 2009 Economic Report there are figures showing the average earnings of people WORKING in Guildford relative to the average earnings of people LIVING in Guildford. The charts clearly show that the higher value jobs are located outside Guildford (mostly probably in London) and that significant numbers of workers commute some distances into Guildford to work here; this is not really picked up by URS, nor are the infrastructure pressures that go with it.</p>
<p>Guildford Vision Group, Bill Stokoe</p>	<p>Missing from this analysis is a comparison of sectors, taking account in each sector of average earnings, average contribution per worker to GVA, concentration of activity in each sector and, if possible, where the employees actually live (in the Borough or commuting).</p>
<p>Guildford Vision Group, Bill Stokoe</p>	<p>There should also be a subsection (or even a separate section) relating to employees' specific needs, such as housing which they can afford, parking or public transport improvements, etc. This will be of particular importance in looking to grow the successful business clusters such as the Knowledge Sector.</p>
<p>Guildford Vision Group, Bill Stokoe</p>	<p>Almost all of the development to the west of the railway has happened since the 1920's and yet no new rail crossing has been provided since before the invention of the motor car. Critically, as noted above, the business and employment focus of Guildford is concentrated in Holy Trinity and Friary & St Nicholas on the east side of the railway, and in Onslow to the west. With poor links and a low quality of environment (for example, between the town and the University and Cathedral), there is much scope for improvement.</p>

Guildford Vision Group, Bill Stokoe	Guildford has not signed up to the Government's Plugged-in-Places (PiP) scheme and has no town centre charging places – notwithstanding the Waitrose planning approval requires charging points to be installed. If there is no PiP scheme, the infrastructure will not be consistent across the region.
Guildford Vision Group, Bill Stokoe	On page 32 (apparently still within section 7.2) the congestion in the town is referenced, as are plans or ambitions to widen the availability of Park & Ride schemes. There is potential for conflict between this section and the NPPF (40 and 41) (referred to on page 29): “40. Local authorities should seek to improve the quality of parking in town centres so that it is convenient, safe and secure, including appropriate provision for motorcycles. They should set appropriate parking charges that do not undermine the vitality of town centres. Parking enforcement should be proportionate. 41 Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice. “
Guildford Vision Group, Bill Stokoe	Car ownership and car use is, as noted by URS, higher than regional and national averages. The poor (and expensive) public transport infrastructure – and even the Park and Ride hours of operation – all serve to ensure reliance on private cars does not diminish.
Guildford Vision Group, Bill Stokoe	There needs to be a much more positive aspiration and metric target – to eliminate surface car parks from the centre of Guildford over the Plan period. This should not be done by simply removing the spaces but by displacing them and using the resulting sites for development.
Guildford Vision Group, Bill Stokoe	The characteristics of Guildford as a Market Town, the County Town, an historic environment and its overall ambience need to be more strongly incorporated. Development of North Street, for example, should be directed towards enhancing the look and feel of Guildford rather than permitting any potential citadel development that would act as a barrier and that would fail to reflect the market town nature of Guildford.
Guildford Vision Group, Bill Stokoe	Soil - Recent GBC planning decision and pipeline proposals risk proper respect for town centre environment: Page 55 notes the former presence of the Guildford Iron Foundry – part of this was at Church Acre Iron Works and the buildings still exist. They are due shortly to be demolished as part of the Waitrose development. Given that very little attention seemed to have been paid to the environmental investigation and remediation of the site as part of the planning process, it seems difficult to envisage quite how Local Plan policy can be contrived to ensure this is more robust in future.
Guildford Vision Group, Bill Stokoe	GVG finds itself at odds, not with URS's comments in this section but with the Guildford Borough Council Planning Department's recent decision at Waitrose and the precedent it has set – if this were equally applied on the other town centre sites, e.g. Solum, the shortfall in housing would increase, the intensity of use of key urban sites would be reduced and the traffic congestion would increase with its consequent impact on business generation and air quality.
Guildford Vision Group, Bill Stokoe	The rather short reference to flood risk and dwellings in the flood plain (which spans both this section and Section 11 – Climate) belies the fact that Guildford has a rather tightly drawn Green Belt boundary, relatively few sites for major new residential quarters, and that some of the most desirable real estate (and yet underused) is in the river corridor – such as the area from the mainline Station to the bypass at Ladymead which could accommodate varying estimates of 2,000, 4,000 or even 6,000 dwellings.
Guildford Vision Group, Bill Stokoe	There needs to be a very clear set of guidelines but also a major discussion amongst the community to establish what could be developed without unnecessary or increased risk from flooding. This could play a crucial part in helping to reach the required number of residential units in the most sustainable way.
Guildford Vision Group, Bill Stokoe	The North Street site needs to be carefully considered, for example, in terms of its impact on the roofline and views into and out of Guildford, etc. It is important, however, that the desire to retain all current views and viewpoints does not preclude viable development which could enhance the town for the majority but might require some compromises.
Guildford Vision Group, Bill Stokoe	A robust process for engagement with the town and its stakeholders would help to clarify those views which must be protected at all costs and those which may be varied through development.
Guildford Vision Group, Bill Stokoe	The proposal suggested at Solum's public meeting of an eight storey 'wall' in front of the station may in fact have a greater adverse impact on the skyline than a taller, narrower building (notwithstanding any objections that may exist to the scheme in any event). The careful assessment of all developments in terms of rooflines, views and overall environmental/landscape quality must be incorporated in some way in the Local Plan so as not to frustrate development but to control its impact. The need to have such controls in the Local Plan should, therefore, be outlined in the URS report.
Guildford Vision Group, Bill Stokoe	As far as the Local Plan goes, GVG believes there should be more planning-specific context. For example, new developments should be designed to accommodate appropriate waste management systems; developments during construction should actively manage construction waste so as to avoid creating it in the first place.
Guildford Vision Group, Bill Stokoe	In terms of the town centre, there needs to be a much tougher stance on waste management such that waste collection does not interfere with pedestrianized areas, and that rubbish bags or bins are not left out in the main public areas to the detriment of access and aesthetics.
Guildford Vision Group, Bill Stokoe	Given that much of the impact from development and the development itself will take place in the Town Centre and that there is no holistic master plan for the town, the Sustainability Assessment will have to be undertaken many more times than would otherwise have been the case – a Master Plan would have provided a Baseline of its own.
Guildford Vision Group, Bill Stokoe	Any savings that might have been presumed to be achieved by not bringing forward a comprehensive Master Plan will be systematically dissipated through this process and the lead time for an appropriate Plan for the town will be greatly increased.
Guildford Vision Group, Bill Stokoe	GVG, consequently, reiterates its call for a holistic masterplanning exercise for Guildford's business area and its links to the rest of the Borough and region.