



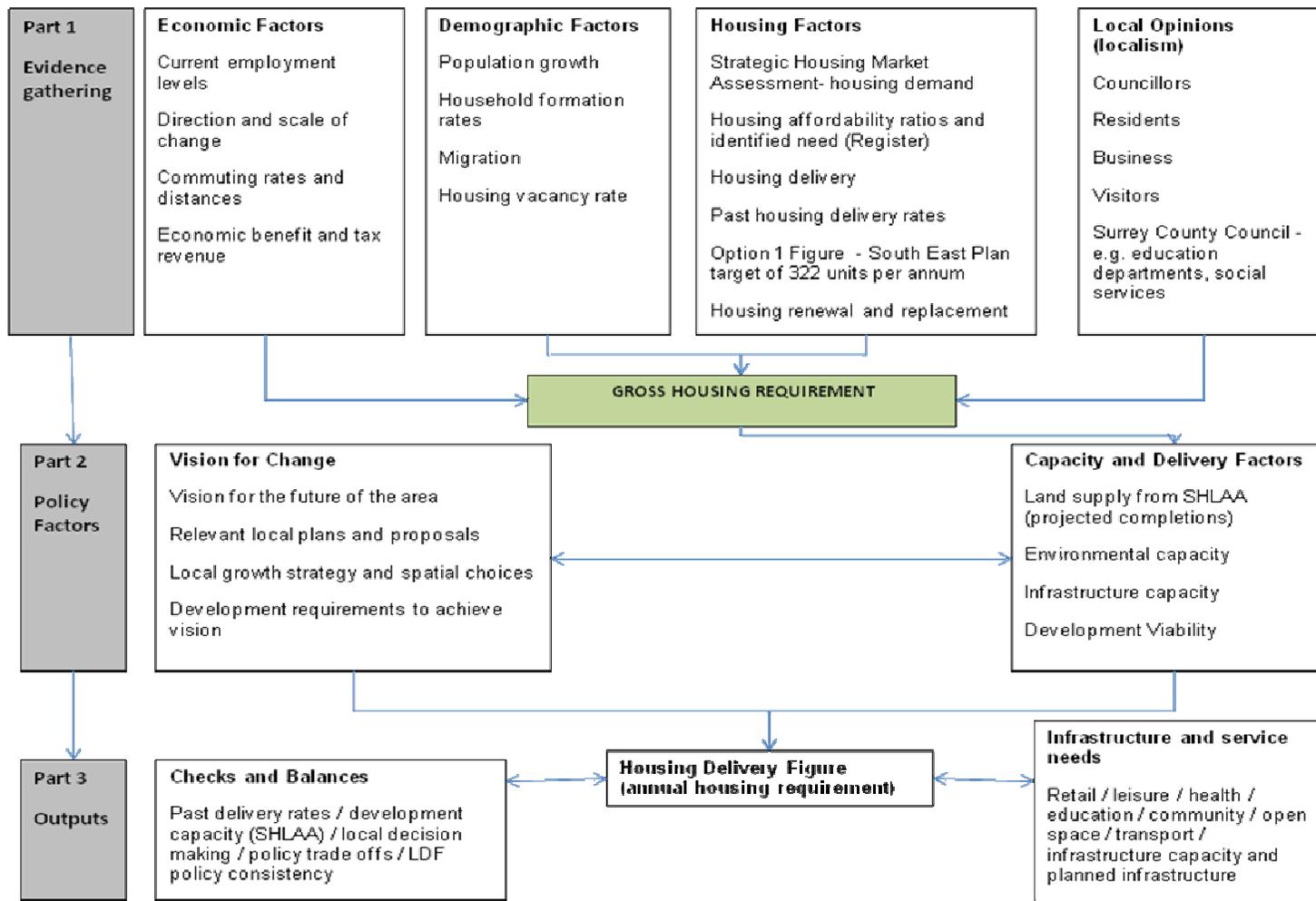
Who needs housing?

Consultation – 30 May to 8 July 2011

Summary of responses

Setting a gross housing requirement

This diagram shows all of the factors that contribute to setting a housing requirement for the borough. This consultation forms part of stage 1 of the process.



Summary of responses

Thank you for responding to our consultation – who needs housing? We received 167 responses in total, the majority of which were submitted using our online response form. Responses were received from a range of people and organisations, including residents of the borough, people who work in the borough, parish councils, resident associations, businesses, landowners and agents representing landowners. The consultation papers are still available on our website¹ should you wish to refer to them when reading this summary.

Part one of response form - statements

The first part of the response form gave you the opportunity to express your support, disagreement or neutral view for a series of ten statements about housing provision in the borough. The summary of the responses is shown on page five.

There is clear support for more affordable housing in the borough (statement 1 - 70%) and support in general for more new housing (statement 5 - 59%). These views were balanced with concerns about infrastructure provision (59% of respondents supported the statement - I think new housing should be built only if it will contribute funds to the new and improved infrastructure and community services required to support additional new homes) and the impact on the countryside. 32% of respondents supported the statement 8 (I would like to see all countryside land protected, even if that means not being able to provide much more housing and perhaps constraining the local economy), and 38% disagreed, and 64% agreed that our most important countryside land should be protected (statement 9).

In reference to the economy, 51% of respondents disagreed with statement 4 (I support only a small amount of additional housing in the local area even though it might discourage business and investment and might lead to less job formation and higher house prices), 43% disagreed with statement 6 (I think that the local area cannot accommodate an increase in jobs and employment areas, so I think people may have to travel to jobs outside of the borough. I realise that this may lead to a higher level of out-commuting and increased traffic congestion) and 57% supported statement 7 (I think that there should be more jobs provided in the local area and that will help reduce the level of out-commuting and ease traffic congestion).

The responses to this section show a wide variety of views, and opposing views on some issues. For example, 42% of respondents supported statement 10 (I think that this local area can only accommodate a limited number of new homes. I realise that this will not help those people currently living here who are in urgent need of suitable accommodation, including those who cannot afford homes to rent or buy at market prices), however, 40% disagreed.

Part two of the response form - scenarios

Based on their responses to the statements, respondents were asked to select which housing scenario(s) they supported. The topic paper set out background information relating to each scenario².

¹ www.guildford.gov.uk/whoneedshousing - includes the topic paper

² Scenario 1- Level of housing based solely on demographic change

Scenario 2 - Level of housing to meet some future demand

Scenario 3 - Level of housing to meet future demand but would not address the need for affordable homes

Scenario 4 - Level of housing that will meet future demand and address limited need for affordable homes

Scenario 5- Level of housing that will help address the need for affordable homes

The level of response for each scenario is shown on page six. Scenarios 4 and 5 received the highest numbers of support (58 and 61 respectively), followed by scenario 1 (34). Some respondents who selected scenario 1 wished to express that they had done so on the assumption that scenario 1 related to past agreed housing targets.

Part three of the response form - types of housing supported

Consistent with the support for more affordable housing in the borough, affordable housing (both flats and houses) was the most supported type of new housing (108), followed by two and three bedroom private market houses (83) and sheltered accommodation apartments for those over 55 years old (77). The type of housing that received the least support was large four and five bedroom private market houses (33) and Travelling Showpeople plots (23).

To see the number of responses for each type of housing, see page seven.

The level of response

We appreciate the time taken by those who responded and gave us their views. The responses we received are very useful as one of a number of pieces of information that will inform the housing delivery figure. (See page 2 for a diagram of the process to set a housing delivery figure).

We recognise, however, that the total number of responses is small in comparison to the number of people living and working in the borough. We heavily publicised this consultation and distributed at least 7500 consultation postcards to residents and businesses across the borough and emailed over 1500 contacts on our mailing list. We will continue to publicise our consultations in the community, in line with the Community Engagement Strategy and Community Involvement in Planning (2011)³.

The response form

Some respondents commented that they found it difficult to respond to the consultation without proposed housing numbers alongside each scenario. Also, some people were concerned that the consultation encouraged respondents to select scenarios that resulted in high housing numbers, and that the impacts of the scenarios on the countryside and on infrastructure were not clear. Some people commented on the actual statements, agreeing with some parts but not always the links made between issues.

The consultation was carried out in accordance with the diagram on page two, which shows that local opinion is sought prior to the development of a housing requirement. We needed to know your thoughts about future housing provision to help us develop a housing requirement figure. At the next stage, we will look at capacity and delivery factors and the future vision for the borough to help us to develop a housing delivery figure. As the diagram shows, your views together with the evidence base will inform this process. You will have the opportunity to give your view of the proposed housing delivery figure during our next consultation, scheduled to take place in 2012.

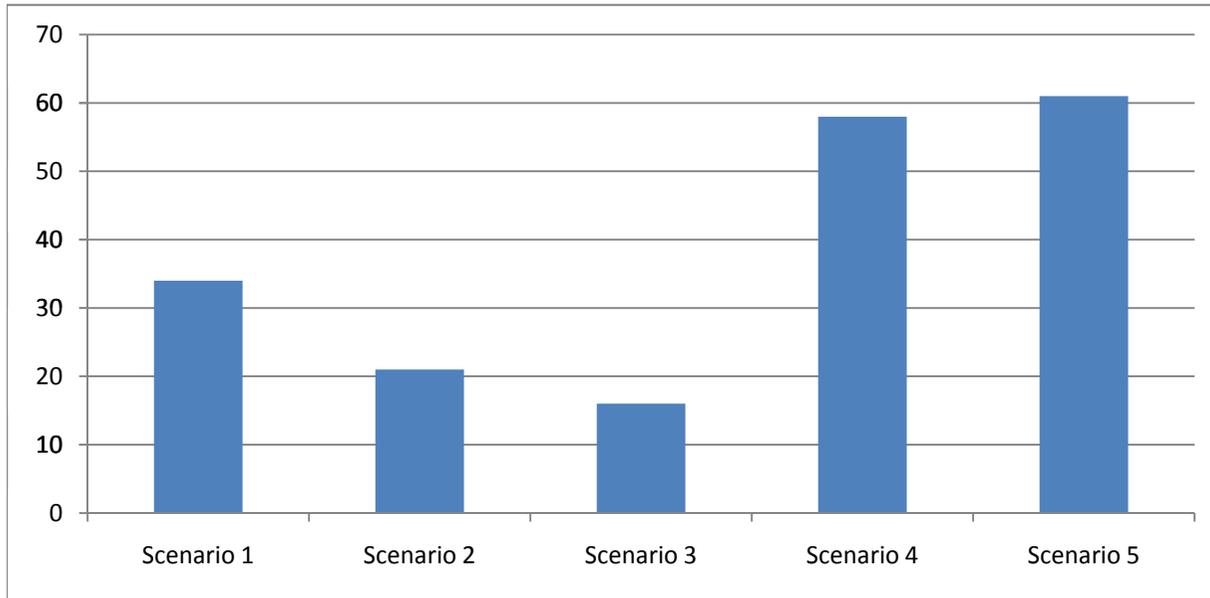
To be kept informed in the future

Many people who are interested in the issues we have discussed are registered on our mailing list so they are notified of consultations when they start. If you wish to be on our mailing list, please email us at planningpolicy@guildford.gov.uk. Alternatively, you can follow the Council on Twitter [@GuildfordBC](https://twitter.com/GuildfordBC).

³ www.guildford.gov.uk/ces

Statements	Support	Neutral	Disagree	No Response	
1. I think there should be more affordable housing built in the local area to help people that cannot afford market prices for housing (either to buy or to rent).	70%	14%	11%	5%	
2. I think there has been enough new housing in the local area over the past years.	24%	21%	50%	5%	
3. I think new housing should be built only if it will contribute funds to the new and improved infrastructure and community services required to support additional new homes.	59%	19%	14%	7%	
4. I support only a small amount of additional housing in the local area even though it might discourage business and investment and might lead to less job formation and higher house prices.	27%	12%	51%	9%	
5. I welcome new housing to enable people to find suitable accommodation, to support the local economy.	59%	13%	22%	6%	
6. I think that the local area cannot accommodate an increase in jobs and employment areas, so I think people may have to travel to jobs outside of the borough. I realise that this may lead to a higher level of out-commuting and increased traffic congestion.	27%	24%	43%	6%	
7. I think that there should be more jobs provided in the local area and that will help reduce the level of out-commuting and ease traffic congestion.	57%	20%	17%	5%	
8. I would like to see all countryside land protected, even if that means not being able to provide much more housing and perhaps constraining the local economy.	32%	25%	38%	4%	
9. I think our most important countryside land should be protected, but I think some countryside land could be used to provide housing and employment land in the future.	64%	10%	21%	5%	
10. I think that this local area can only accommodate a limited number of new homes. I realise that this will not help those people currently living here who are in urgent need of suitable accommodation, including those who cannot afford homes to rent or buy at market prices.	42%	13%	40%	5%	

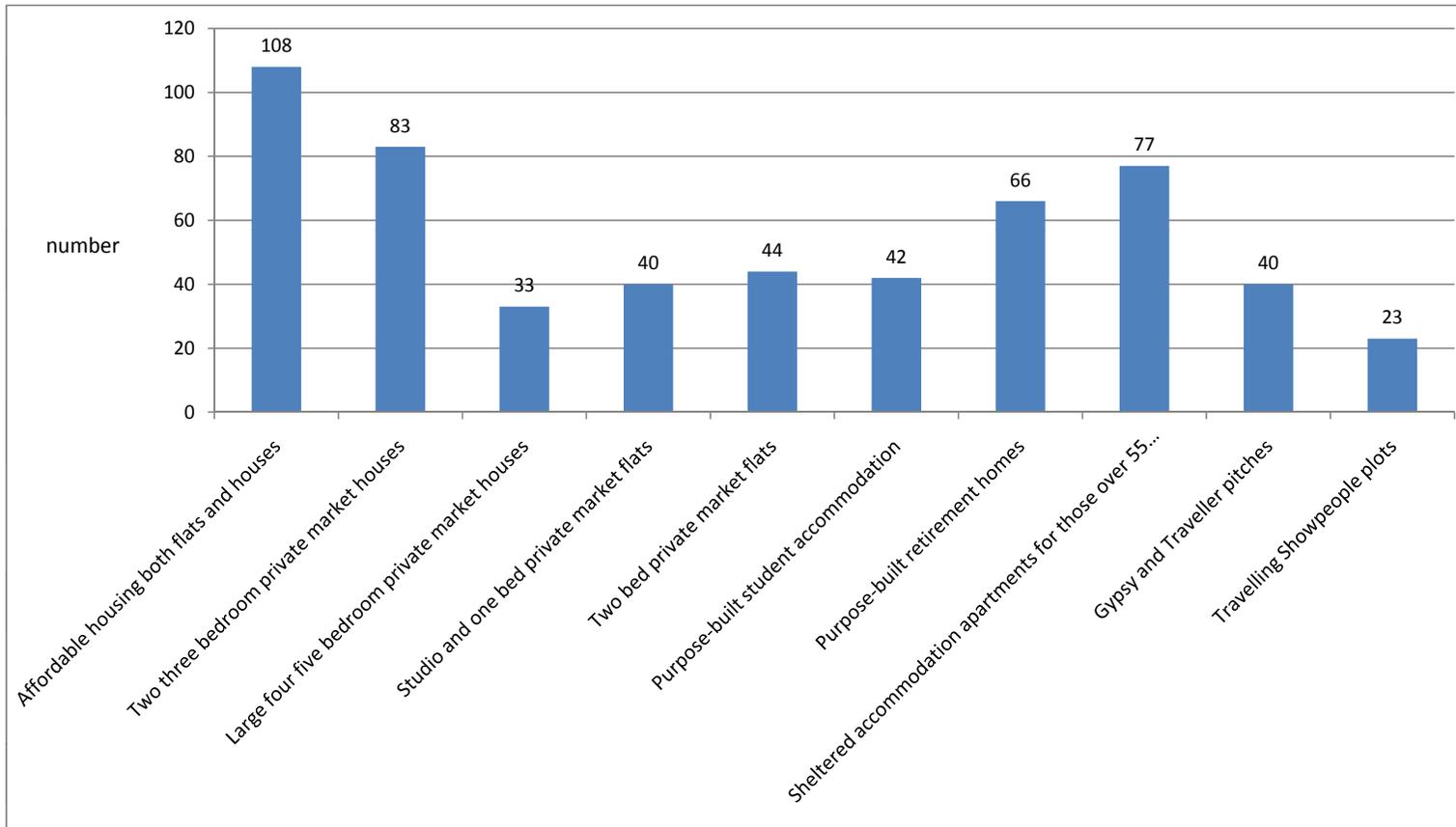
Preferred scenarios (multiple selections allowed)



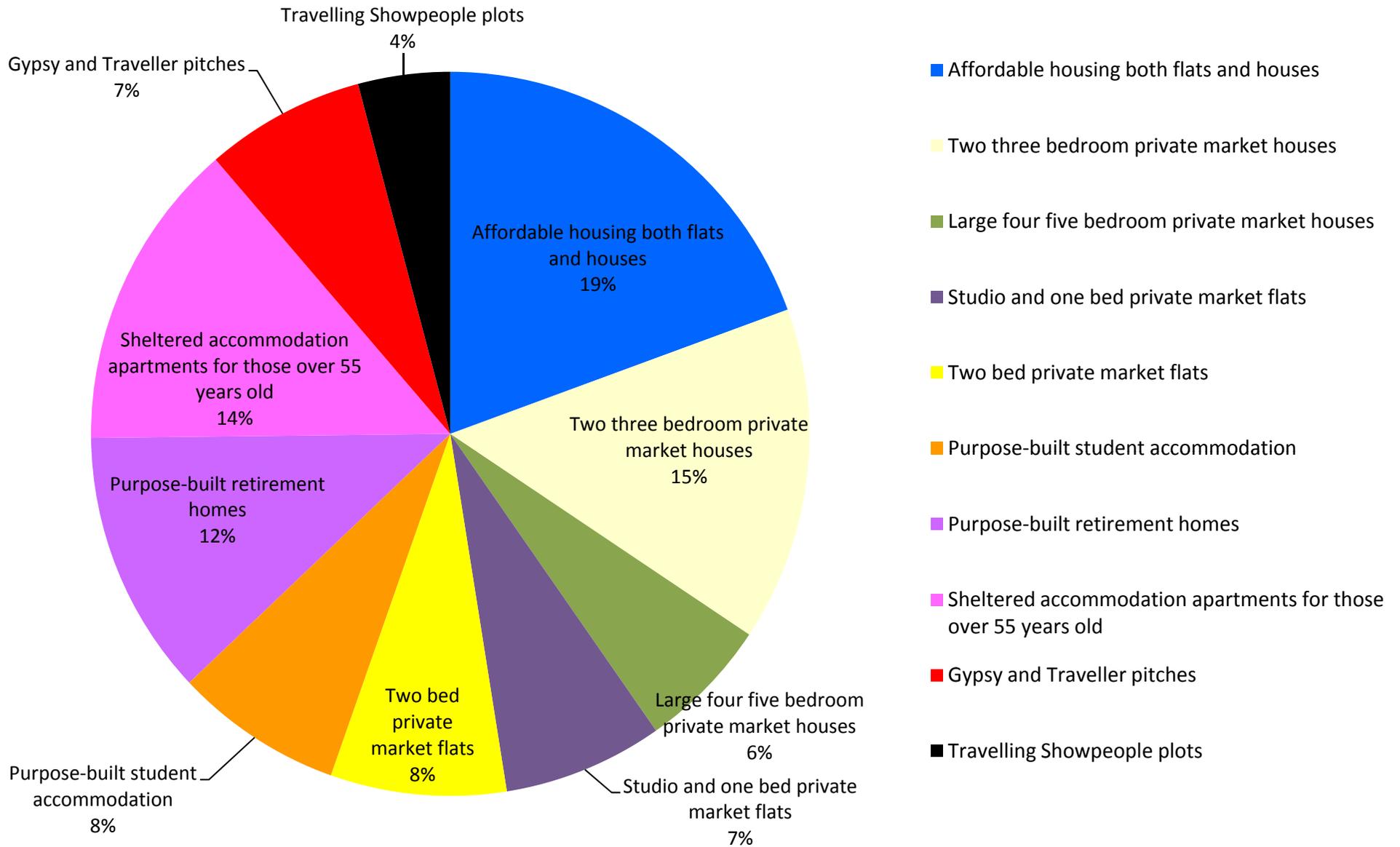
Scenario	Number of selections	Description of scenario
Scenario 1	34	Level of housing based solely on demographic change
Scenario 2	21	Level of housing to meet some future demand
Scenario 3	16	Level of housing to meet future demand but would not address the need for affordable homes
Scenario 4	58	Level of housing that will meet future demand and address limited need for affordable homes
Scenario 5	61	Level of housing that will help address the need for affordable homes

Types of housing supported (multiple selections allowed)

Type of housing	Number of selections
Affordable housing both flats and houses	108
Two three bedroom private market houses	83
Large four five bedroom private market houses	33
Studio and one bed private market flats	40
Two bed private market flats	44
Purpose-built student accommodation	42
Purpose-built retirement homes	66
Sheltered accommodation apartments for those over 55 years old	77
Gypsy and Traveller pitches	40
Travelling Showpeople plots	23



Types of housing supported (multiple selections allowed)



Any additional comments?

Respondents were given the opportunity to submit comments as part of the questionnaire. All comments have been considered. This is a brief summary of the most frequently made comments. To read all of the additional comments submitted, see Appendix I of this document. Concerns regarding the response form, statements and the lack of housing numbers for comment have been discussed on page four.

Many comments discussed new housing in the context of the infrastructure needed to support it, and detailed current local problems associated with infrastructure such as traffic congestion and education provision. Many people said that better infrastructure is needed before new housing is built and that new housing will put additional pressure on the current infrastructure. Some comments were made about growth being unsustainable in this area as infrastructure cannot cope.

Many respondents said that more affordable housing is needed in the borough, especially for those who work locally in lower paid jobs and cannot afford to live in the area. Also, that it is affordable housing rather than flats that is needed to encourage families to settle in the area.

Local employers reported difficulties in recruiting young people because they move out of the area due to a lack of affordable housing. The local employers that responded said poor public transport and the high cost of housing means there is often a lack of available staff. Some respondents suggested using vacant offices for housing.

Some people raised concerns about levels of migration to the area and suggested that the South East is over populated, and that it is the responsibility of the Government to encourage growth outside the South East. Also, some people expressed a desire that new housing should be for local people only.

Comments were made about new housing that has been built, saying that it is too small and cramped, without adequate parking provision. Some people said that new housing needs gardens and that new flats are too small. Some respondents said that there is a lack of suitable family housing in the borough.

Regarding sheltered accommodation, some comments identified this as a type of housing that is needed, with one respondent giving an example of living in a village in a large home and wanting to downsize but not being able to find suitable accommodation.

Many comments related to development in the countryside, with some people saying that new housing should not be at the expense of the countryside/Green Belt and that the landscape and character should be protected. Some people did say that they believed there was some room for expansion around the villages.

Comments were made relating to the technical process of setting a housing delivery figure, stating that the figure must be supported by robust evidence, otherwise there is a high risk that the Core Strategy will be found to be unsound at examination. Planning agents representing landowners responded stating there is a need for more housing (using available evidence, such as the Strategic Housing Market Assessment (SHMA) - referred to in the topic paper) and for the final housing delivery figure to be based on robust evidence, in accordance with national planning policy. Comments were made suggesting that there is not

enough suitable, available and viable land to accommodate the amount of new housing needed (in accordance with the SHMA), in the urban areas and village settlements.

Evidence was submitted regarding the need for consideration to be given to determining how new developments can better meet the needs of disabled persons.

A few comments were made about provision of Gypsy and Traveller pitches/plots. Some said provision should be spread out across the borough, and there was concern about a delay in provision if it follows preparation of another Gypsy and Traveller Accommodation Assessment (GTAA).

Contact us

If you have any questions regarding this document or the consultation, please contact us

Email: planningpolicy@guildford.gov.uk
Tel: 01483 444471

Planning Policy
Planning Services
Guildford Borough Council
Millmead House
Millmead
Guildford
GU2 4BB
United Kingdom

Appendix I – The comments received

Note: The responses are in no particular order. Any comments that may identify individual people or which may be offensive or inflammatory have been blocked out or removed.

My name is [REDACTED] and I live with my partner [REDACTED]; we are both around 30. We currently live in Charlotteville in a smallish one bedroom flat. Although we love the area, the rent is quite expensive for us. This is not helped by the rather high council tax band.

We have a great desire to own our own house, but currently we are having a hard time getting the money together for a deposit. I am a software engineer for a small company, and [REDACTED] is in the process of establishing her own company.

We looked into shared ownership schemes but became disillusioned when most of the houses seemed to be far away (Redhill, Caterham etc.), and the one flat we did see in Woking was in a very noisy and crowded location. We are also both environmentally minded, and would like to have a more personal and eco-friendly design.

I believe there should be a sensible ratio of affordable homes for the butcher baker and candlestick maker - aligned with the lower need for housing for the 'toffs'

For each 'Toff!' needs his car mechanic, house painter, postman, and shop keeper. Such that they all need housing - the past South East Plan specifically and explicitly mentioned the need for housing the financial city folks, but failed to consider everyone else.

Noting that covering the country with housing means a need to supply building materials, and water, gas and electricity and transport provision - the ability to actually supply these essentials MUST be considered in any attempt to change the current housing supplies level.

More affordable housing is desperately needed in the borough but is often resisted by NIMBYest attitudes; the council should be robust in resisting this pressure.

High density housing for first time buyers is a must.

Actually, what we need is not more housing, but less people, but governments of all shades have to appear to be family friendly

I would not support any development whether private or affordable, which in any way impacts current residents and builds on green land. Green land should not be used for development.

There is plenty of land in the borough on the periphery of urban areas that could be developed.

If countryside land is to be used it should be small developments on the edges of the town or villages. I would not like to see huge estates developed on green fields. It is important that bus services are improved to support these developments. Many villages are virtually cut off from the town centre isolating many groups, unless you can drive, causing unnecessary congestion.

As a local employer I can see our work force is getting older. We find it difficult to recruit younger people primarily because they have to move out of the area when they move out of their parent's home. Our research has shown this is mainly due to their not being able to afford to live in the local area.

Affordable housing (really affordable, not a £135k "ideal starter home") would help younger

people stay in the area, reduce commuting and therefore traffic.

Finally, one of the main reasons for established businesses relocating out of the area and new businesses not coming is the lack of available staff. Affordable housing would therefore increase inward investment and help secure our current employers.

With 402 people on our waiting list we need more allotments - not more houses

I think in the current economic climate people cannot get mortgages for part ownership. Therefore more council properties need to be built. Even the old prefab style ones are better than nothing. Also it is grossly unfair that local people cannot move back to where they were born. Not even by doing a council transfer. The policy that GBC have adopted regarding allocations is grossly unfair with this bidding system. People that have brought there council house and want to sell should sell it back to council. Money from the selling of houses should be put into building more local homes

I consider that there is ample land of low agricultural or scenic value within the borough for all housing needs in the foreseeable future.

The Council should continue to use previously developed land for new homes as much as possible, thereafter using land within towns/villages or on their immediate edge, to control urban sprawl.

All development should consider protection of biodiversity as a major requirement as well as protection of the countryside generally.

I think 55 is a low age for assisted housing with better levels of health.

With limited land is it more important to support the economic health of the borough/country and let other boroughs provide retirement accommodation and to a degree sheltered housing [I understand Rushmoor may be building significant additional homes on ex army land as an example]. Or is the grey pound and a mixed population more important?

Taking land to build housing estates on is all well and good. But these new estates need adequate roads, schools shops and healthcare and they actually need to be on the estate, as the surrounding areas are unable to cope at present with the amount of strain that the local community has to put up, with regards to the incoming traffic and people from other areas using the trains, shops, schools and health services.

In Ash Vale we are over run with traffic coming in to use the station, cars being parked all down the Avondale estate every day making it hazardous for families with children who live down there. The estate now has a flooding problem and this has been said that this is due to the Old farm place estate being built and the sewers tapping in to existing sewers, which in turn cannot cope on heavy rain fall and then cause flooding on Avondale, even after the flooding two new factories were passed for planning and built even though over several families had to move out of their homes for months while the flood damage was seen to. Not only that everyone now has a high excess due to flooding and some cannot even claim if this happens again, but still the council continue to build on land when people have stood up and said no its not right to build.

I think you should regenerate old houses, shops and flats instead of building large community estates. I think trying to integrate social housing people into the same estate does not always work and who wants to pay 250,000 plus for a house only to find that the house next door which may not have the same finish but still looks the same is housing

association and some people (not all) do not care how they live or how they treat their neighbours. It is far better to have a set of small houses than large estates and re use old property that is already there then also the period and character does not change in these communities, there are plenty of disused houses and shops all over the place.

I believe that selected sites adjoining existing settlement boundaries should now be considered for development rather than cramming the towns even more.

The current use of land for housing schemes does not provide the best houses. The houses being built are too small, cramped in too close, with little gardens or parking. Some developments are being turned down in fear of 'turning a village into a town', when that is exactly what is required to expand the county of Surrey and allow it to flourish

If more houses are built, there needs to be more efficient and cheaper public transport to avoid more congestion.

School buses should be obligatory for most pupils.

More council 2 and 3 bedroomed houses with a garden, I think this would suit a lot of small and larger size families

Surely there is also the possibility of turning 2 story 2 bed houses into 3 story 3 or 4 beds. There is a huge need for larger housing, and although this would cause residents some inconvenience long term it would be beneficial especially for those already with family (work and school nearby) or those who have paid so much to improve garden or housing, who really don't want to move but needs change and therefore they are forced too. And as the space is already developed on it should come across minimal objection unlike new building developments.

In my opinion we need much more council housing to house families whose parents also live in council accommodation. We never had the chance to buy and our family has the same problems. We can never earn enough to buy in this area.

The other stipulation I would make is you don't sell these houses. If we had bought my mother in laws house we could have been very rich now.

Given the increase in student costs, I doubt if the current landlord /student rental market is sustainable, the university needs to offer low cost student accommodation as part of its package.

Landlords should be encouraged to rent to those on the council list for housing or maybe the council should use their housing money to buy unlet properties and take them into the public domain.

There should also be more imaginative use of redundant office blocks by turning them into living accommodation.

We live on the Worplesdon Road which grinds to a halt daily, with inward commuting to Guildford, indeed when I commuted to London I used Worplesdon station where parking demand now exceeds ability. No public transport of course.

Pressure on infra-structure in the borough i.e. schools, roads, hospitals etc is very high and any additional housing should include for financial contributions to go directly towards upgrading and improving such infra-structure needs.

The Council should do everything in its power to block any further development on land outside of existing towns and villages. The countryside has been destroyed at an alarming rate over the last 20 - 30 years in the South East. The Government should be doing everything they can to encourage more companies to move to areas in the country where unemployment is high, therefore encouraging improvements in run-down and high unemployment areas. The more councils in the South East keep building more and more accommodation, the less incentive there is for people to either move away, or stop pouring into the South East. This in-turn deprives more and more areas in other parts of the country. I believe councils in the Home Counties have a duty to encourage the Government in this direction.

The quality of life in Surrey is slowly decreasing because of overpopulation. Of course there is a housing shortage but the long term solution is less people not more housing. More houses just make the situation worse.

As manager of a local business it is becoming increasingly difficult to employ staff due to the high cost of local housing, lack of affordable/council accommodation and poor local public transport. I would not want to see the destruction of our rural setting but I do feel the local authority are at times too rigid in their planning restrictions particularly in village settings, leaving local young people with little or no housing options.

In addition to areas of natural beauty and areas where protected species exist, all areas currently designated for 'Agricultural and Recreational Use' should be kept to the last as areas identified for residential development.

There is a lack of suitable family housing within the borough. As a young person leaving with my parents and siblings, I am hoping get on the property ladder soon. My parents have found it a big problem being able to find and fund suitable family housing in the borough. There is a severe shortage. There is a severe lack of detached reasonable sized first time family homes on the market, which means market prices, are ridiculously inflated. More reasonable less dense housing with privacy needs to be accommodated in the borough, but not dense development, on small plots with a high number of units per acre. Take a look at some of the estates built in the 50s, 60s, and 70s these were well thought and well planned.

This survey's questions suggest a bias towards the presumption that an increase in new housing and development is inevitably the correct way forward. I would like to live in Belgravia, but I can't afford to, so I don't. I would like the local council to pay for my accommodation, but they won't and this would be morally wrong anyway.

I moved away from home to find employment and somewhere I could afford to live. I maintained a frugal lifestyle for many years, and now benefit from that investment in my own future. Why should I pay through taxes to subsidise someone else's housing and lifestyle wants (not needs) just because they are not prepared to move away to find suitable accommodation and employment.

There are hundreds of thousands of empty properties in various parts of the country, but they are generally not in places where people prefer to live. Nationally, therefore, there is no property shortage at all; only a shortage where people want to live.

If we were to build thousands of new homes in Guildford and completely eliminate the

waiting list, there will still be hundreds of thousands of people who would want to live here (because of the subsidised housing) and we would end up with an even bigger waiting list. And still the hundreds of thousands of empty properties would remain empty elsewhere in the country.

These issues have little to do with what a local authority should be doing; let the markets decide.

The ONLY proper remit of a Local authority as far as housing is concerned is to provide infrastructure where needed, and a safety net for those who really need it - i.e. the severely disabled and the destitute elderly. Where government (local or national) provides subsidised accommodation or employment it contributes to the dependency cycle.

Government interference in the property market has produced a lot of 1 and 2 bed "affordable" homes at the cost of fewer 3 and 4 bed family homes which are what is really needed locally. Without such interference, there would no doubt have been more family homes built in recent years.

The Green Belt is a long established and successful national policy and it should not be interfered with.

The Local Authority should support development and redevelopment within the existing built up areas by providing infrastructure but this development should be driven by the private and commercial property markets and not government.

Decreeing any form of quota or target for numbers of new homes is like the local authority deciding that only 5000 new cars or lawn mowers can be sold in Guildford in a year, or that only TV sets with a screen less than 24" can be sold or at least 50% of all cross road junctions in the Borough should have traffic lights installed! This is simply too much government and I don't want to pay for it.

I am currently on the housing list as are other members of my family. There is not enough suitable accommodation for those who need it most. More affordable homes need to be built.

Green belt land should be sacrosanct. Brown field sites should be used for new developments.

Currently within the Guildford area, there seem to be a large number of offices that are for let and/or are not being used. This land could be used to provide for much needed affordable accommodation (flats) instead of increasing the number of empty office and commercial buildings in the area.

Also, there has been the site at the bottom of Portsmouth Road, near the George Abbott pub, that was demolished years ago and has never been used. This land could also be used for affordable accommodation.

We have to get away from the idea that the only way forward is growth because it is unsustainable and would have to be achieved at the expense of others. The infrastructure in and around Guildford is already creaking and the past performance of administrations and developers gives no confidence that growth will bring improvements.

Extending the town and the villages around will reduce the quality of life for existing inhabitants. We must make better use of what we have-the area around the Friary is a good place to start.

With reference to the little card sent to me recently (new ideas for new building in the area) might I put the idea of building more one and two bedroom flats and moving people (i.e. one person in a three bedroom house) into them? I know it won't solve the housing situation, you never will. Perhaps the tenancy agreement to be awarded to state then when the tenant no longer requires the larger housing they would be asked to consider smaller to allow younger people with families to be housed.

Land on the Wisley Airfield should be used for mixed housing including affordable housing.

The young people can no longer afford to first time buy so it is a prime responsibility of the council to provide reasonable rented accommodation, and not rely on the private sector to do this, remember RACKMAN.

Guildford should aim to develop no more than the 322 dwellings pa that were proposed after considerable thought and discussion by interested parties - e.g. Guildford Soc, CPRE, East Guildford Residents Association and GBC.

Guildford has substantial infrastructure, topographic problems and flood plain issues that prevent a larger increase.

Better infrastructure is required before embarking on the development of 322 dwellings pa - this is essential, as the present infrastructure is overloaded.

Guildford should NOT become an overspill town for London. This was one of the problems that the 422 dpa target imposed by Government in its version of the SE plan that was rejected by Guildford would have encouraged.

Green belt should remain protected.

Guildford should not embark on a major expansion of its shopping centres or of its work places. The infrastructure problems are such that it will help destroy the character of the area - which in turn would make Guildford a less attractive place to live and to work.

Whatever increases in dwellings is agreed, they should be balanced between all groups listed - except in the single bed/studio category (there are already lots of these) and in the 5/6 bedroomed huge houses that have been approved over the past 5 years in increasing numbers.

It is very important to conserve the character of Guildford and its various districts. The Residential Design Guide 2004 and the Landscape Character Assessment 2007 are very important documents that should be reinforced.

We feel there is room for expansion around the villages. This could help maintain local shops and services, and should be supported by public transport, including bus services into the evenings. Private motor transport is a significant problem in the area around Guildford, and we would like to see more measures to help residents choose public transport, car sharing/street cars and cycle use to offset the negative effects of building in rural locations.

In towns, larger flats should be available. One shocking aspect of renting around this area is the high cost of such tiny inadequate spaces as seem to form the majority of the cheaper accommodation. We think these are potentially the slums of the future. As a citizen I want to positively contribute to the general wellbeing of society by my personal choices. I would like

to be able to reduce my carbon footprint by being able to afford to live nearer to my work and reducing my energy use and waste. Less commuting time also means more time to contribute to family, friends and community. The design of housing affects one's ability to do these things. Whether we can travel less far to work, compost our waste, collect rain water and reduce our household energy use is governed by the housing stock available to us. In a studio flat (or small one bedroom flat) with one car parking space you are limited in what beneficial actions you can take.

We would like to see houses or flats with at least two bedrooms, have provision for cycle storage, and have gardens or shared community gardens. A great step to reducing car use would be to provide a car parking space in residential areas, villages or any new development for shared-use cars such as a Streetcar.

We feel the borough has a moral and environmental duty to provide living accommodation for those who work there and actually enable it to function.

Poorly conceived questions that were biased and contained more than one concept per unit.

It is important to treat all groups in need of housing equally. It is divisive to be pro active such that one group feels it is being victimised at the expense of another who may be ignoring or manipulating planning law.

Infrastructure is the main issue in Guildford which with inadequate highway operation leads to frustration and anarchy. The pollution in the town centre is a considerable cause for concern.

Public rights of way and countryside access is being used as a disposable pawn in the development of the borough with developers especially the big ones being allowed to ignore planning conditions.

The use of existing public open space as SANGS is just another tax on development to allow GBC to raise extra revenue rather than the duty to mitigate against the increase in population use of the SPA

I do not feel that any further houses can be built in the Guildford area.

Good luck to all of us!

We absolutely need more houses in the borough.

Keep Guildford as rural as possible

We need more shared ownership properties.

A stronger Housing team at GBC which is currently very weak

A more proactive planning department - at the moment most new development is on Appeal

Ripley Parish Council considers that the lack of numbers of houses for each scenario and the lack of information about the likely impact on infrastructure and on the Green Belt means that it is not possible to make an informed choice of scenario.

The current infrastructure is not adequate in Ripley with heavy traffic, a declining bus service, regular flooding of the High Street being obvious problems. These problems need to

be addressed before any significant increase in housing can take place. There are brown field sites in Ripley which have planning permission for development but still remained undeveloped. The planning process needs to be more slick so that small developments happen more quickly.

Affordable homes are needed in Ripley in order to promote a balanced community but the Green Belt needs to be protected. Brown field sites need to be identified. Members are concerned that the settlement boundaries of rural villages are protected to prevent villages merging together.

The council should absolutely NOT build on green belt land, common land or existing allotment sites including sites where plots should have been released but have not. Basically we need less people, not more housing.

The roads around Guildford are already busy, more housing would exacerbate the situation.

This questionnaire is a bit too wordy and not exactly inviting. Most people motivated enough to answer are already aware of the general pressures facing the area. Because of this you will have results that are skewed in favour of those opposed to development and provision for the less well off/fortunate, and more in favour of protecting the value of their homes. This can not result in a democratic or representative consultation. I hope that you will be doing considerably more work to make sure that all views - even those of the lazy or those who are less comfortable with IT - are taken into account.

In my view, this consultation is so badly composed that its results will be highly questionable.

Guildford Borough is worth protecting against becoming an extension of outer London. Nor do I want Guildford Borough sprawled into and joining up with Woking. I do not want Guildford or its environs to become like Croydon, Woking or Basingstoke for example.

Guildford Borough has large tracts of Green Belt/AONB which currently are enjoyed by Londoners as their recreation lung as well as by Surrey Residents. I wish to keep the Green Belt/AONB for all and not have it trashed/ overdeveloped. I support the Scenario 1 development plan.

I feel strongly that the Green Belt must be protected and development on adjacent areas restricted.

Brown field sites (not gardens) should be used for affordable housing. Empty offices should be converted for housing wherever practical and possible under existing legislation. Changes to legislation should be pressed for if it precludes this.

I hope that it is acceptable that I submit these written AONB/AGLV views/advice rather than complete the on-line questionnaire as it is not relevant to the role of the Surrey Hills Board. The questionnaire seems to be mostly directed at members of the public and other local bodies.

The following views/advice are submitted on behalf of the Surrey Hills Board that has delegated authority to me to express planning views.

I make reference below to the AGLV as well as the AONB because following both policies in the Core Strategies in Tandridge and Mole Valley, being the only adopted Core Strategies so far in the Surrey Hills AONB, until the AONB boundary has been reviewed the AGLV should be treated in a similar way to the AONB. Furthermore, the Chris Burnett Review of the

AGLV considered that the AGLV in Guildford should be included in the AONB when its boundaries are reviewed. Mole Valley Core Strategy Policy CS13 and Tandridge Core Strategy Policy CSP20 are the relevant landscape protection policies. The Surrey Hills Board is likely to expect the relevant Guildford Core Strategy landscape policy to be similar.

Policy LU7 of the Surrey Hills Management Plan 2009-2014 adopted by your and other constituent Councils supports the provision of affordable housing provided that proposals do not conflict with the aim of conserving and enhancing natural beauty. The housing would have to be for those living or needing to live in that particular local rural area and not some nearby rural or urban area. Any affordable rural housing would need to be restricted to local people in perpetuity. In short it would be an abuse of AONB/AGLV land to be developed to meet the requirements of nearby urban or rural areas outside the AONB or AGLV or where the local housing could be met in those areas.

From the way the scenarios have been set out the above may suggest support for scenarios 4 and 5. That is certainly not the case and this seems to be a flaw in the scenarios and the way they have been put forward. There is therefore a concern that misleading results may come from this consultation. Because of the reference to affordable housing only being provided for in Scenarios 4 and 5 the results are likely to be unduly skewed towards those two scenarios and a greater level of housing when that need not be the case. It would seem to those responding that only if they supported scenarios 4 and 5 would provision be made for affordable housing. That certainly does not have to be the case.

Affordable housing can be accommodated under lesser levels of housing (Scenarios 1 to 3) if the affordable housing quota for all developments is set sufficiently high. For instance, Policy CS4 in the Mole Valley Core Strategy requires a financial contribution equivalent to 20% affordable housing in developments of 1 to 9 gross dwellings (gds), and actual on site provision of 30% in developments of 10 - 14 gds and 40% above 15 gds. One can have that type of policy within scenarios 1 to 3.

It is appreciated that this consultation is only at a very early stage of plan making. Also there are deliberately no numbers of dwellings for each of the 5 scenarios. However, the absence of any housing numbers does make it difficult for those responding to make an informed choice or comment.

It is noted that the discussion document at paragraph 6.8 states that the SHLAA will take into account land constraints and it singles out the AONB and Green Belt as being constraints under the assessment of a site's suitability for housing development. For the reason set out above the AGLV should also be considered on a similar basis. Clearly sites in the AONB and AGLV should only be considered for housing as a last resort when all other possibilities have been exhausted. I am therefore not concerned that the Council will propose housing development in the AONB or AGLV except for suitable affordable housing. In the unlikely event that such a site were to be proposed for development the evidence base of the plan would need to show that it would clearly be preferable to any other less constrained site not proposed for development. That is certainly something I would be looking for, but I do not expect it will arise.

The sustainability appraisal seems to be flawed as it excludes any reference to landscape protection or landscape implications of development. Similar concern was expressed to a proposed land allocation toolkit Mole Valley published about 18 months ago. It seems that the similar list of criteria has been derived from somewhere else where landscape protection may not have been a sustainability issue.

Summary

1. Protection of the AGLV against housing development should be afforded similar weight to the AONB until the AONB boundaries have been reviewed.
2. Suitable small scale affordable housing in the AONB is supported by Policy LU7 of the Surrey Hills Management Plan 2009-2014
3. The results of the consultation are likely to be misleading because it can be anticipated that there will be very many who support the need for affordable housing and only scenarios 4 and 5 make any provision for affordable housing. Scenarios 1 to 3 could have provided for an appreciable degree of affordable housing (see Policy CS4 in the Mole Valley Core Strategy).
4. The absence of any housing numbers for each scenario does make it difficult for those responding to make an informed choice or comment.
5. In view of 3 and 4 above there is serious concern that the results are likely to be skewed towards scenarios 5 and 6 when such high levels of housing are unnecessary in order to provide a worthwhile level of affordable housing.
6. Presumably none of the 5 scenarios would result in any housing development in the AONB or AGLV as those areas should only be considered as a last resort, except for small scale affordable rural housing
7. The sustainability appraisal seems to be flawed as it excludes any reference to protected landscapes or any landscape considerations.

Thank you for taking the trouble to send me a full response to some of the points raised in the Board's submission. It will be interesting to see whether the underlying intention of this form of consultation on housing proves to be successful and assists the Planning Authority. It will be quite a coup if it does as it is always difficult to engage the public and other bodies on broad principles when they cannot appreciate the likely physical consequences of options.

I think I now understand why landscape protection was not included in the SA at this stage. However, I would have thought the same argument would apply to some of the other objectives listed in the SA that are dependant upon location and against which the options were not scored. Consequently, landscape protection could have been included in the list on the same basis as the other objectives. But I hope the point I made has been registered so that landscape protection features and is given the importance it deserves at the next stage.

From what I have seen in recent developments, the number of parking spaces set aside for a particular property is completely insufficient for the actual usage of the property. For example, a one bed flat can often be shared by a couple who both have vehicles. That means one of the vehicles is parked on the road causing congestion - or overspill into other residential roads.

I live on a road where everyone parks on their drive and keeps the road clear. A new 'garden grabbing' development has led to residents parking their cars onto the original road. An unwelcome sight indeed. The developers have their profits without regard to the existing

area or to the additional traffic generated on the area.

We can only expect vehicle ownership to increase; accordingly the council should expect each adult person living in a property to have a vehicle. It is my view that any new development should provide 2 off street parking spaces for the first bedroom + 1 additional off-street parking space for each additional bedroom.

Where a garage is built, this should not be allowed to be converted to a room unless the above car parking space remains available.

Beyond these concerns, the traffic impact on local roads should be measured and the necessary improvement costs/wear and tear etc should be borne by the developer.

The council should at all times remember that it is the existing residents who are affected for the long term - not the developer!

There is a need for sheltered housing for the elderly of Tongham area, many of whom live in larger property than they require. This would release housing association housing for use of people with younger families. Tongham has a good bus service to both Aldershot and Guildford and great local amenities, i.e. Shops, Community Centre, Church and School.

I felt that the survey was too predisposed towards a two dimensional conception of housing decisions. In practice, I believe the situation to be very complex. The form was too simple to reflect my overall perspective and, I believe, particularly neglected aspects of sustainability and the opportunity to improve society as a whole by re-arranging the interactions and flows between different societal units.

I am not sure that that the logic of certain statements necessarily hold in all circumstances. For example:

"I think that this local area can only accommodate a limited number of new homes. I realise that this will not help those people currently living here who are in urgent need of suitable accommodation, including those who cannot afford homes to rent or buy at market prices."

This implies that the -only- way to accommodate the needs of people who need accommodation is by constructing new homes. I am not sure that the second sentence necessarily follows from the first. I suggest that the questionnaires statements may reflect the paradigm or pre-conceptions of those who constructed it. (My responses may also be biased, but you are asking individuals for their particular opinions.)

Furthermore, for the question above, I am not clear as to whether this means new homes on presently unused land or whether it includes use of brownfield sites, use of land currently belonging to existing developments, or use of sites containing existing buildings. I believe some assistance may be possible without extending developments on to greenfield sites.

The questionnaire appears to "loaded" towards either favouring stasis or supporting a pro-growth stance. Since growth essentially equates to increasing material throughput of the economy, I cannot support that stance. I would support qualitative improvement rather than quantitative improvement. However, I certainly would not support a static stance either. Thus, overall, I found it hard to accurately express my views within the constraints of the questionnaire -- thus the potentially conflicting answers.

I could write a more comprehensive argument, but I am presently time limited and would have to investigate the issues in more detail before I could provide such a comprehensive

<p>answer. Questions concerning the structure of the questionnaire aside, thank you for asking for my views.</p>
<p>It is clear that considerable number of affordable and for sale housing is needed in the Guildford Borough and every effort should be made to meet this requirement</p>
<p>Thank you for consulting the Environment Agency on 'Who needs housing?' We have no formal comments to make.</p>
<p>The previous government tried to enforce a high annual house building quota which was challenged by Guildford Borough Council. I assume that Scenario 1 is commensurate with GBC's original number of about 322 dwellings per year</p>
<p>What a depressing state of affairs, and this is people's home we are talking about, their safety, security, shelter. Surely there is a constructive, eco-friendly, human answer to this.</p>
<p>This is a rich area and it can afford to have more provision for affordable housing e.g. for teachers, nurses etc.</p> <p>Affordable housing does not mean the end of this nice 'leafy, pristine' way of life that many residents enjoy!</p>
<p>Affordable housing is much needed in the local community, but I do feel that the housing provided should be houses and not flats, we have a glut of flats/apartments at the moment and small families need homes, not rabbit hutches! The local community will only grow in the right way if families are encouraged to put down roots in Guildford therefore giving the locals a pride in their town and creating a good and safe place to live.</p>
<p>Guildford is too congested for any more housing estates. There are other areas that could benefit from regeneration without building in our area. The countryside in this area is why we moved here.</p>
<p>There is more than enough empty houses in the area that can be renovated. Also the number of empty office blocks can easily be converted into flats to provide "cheaper" local homes.</p> <p>We have more than enough affordable homes, unfortunately they are not in demand because of a small minority of nuisance neighbours and youths in those areas ruining those communities.</p>
<p>I think there is a need for more affordable housing for people like myself and my partner, or rent from a housing association but want to get on the property ladder. We both work full time, and I am in a professional job, but we can barely afford to pay our rent and out goings each month on a one bedroom flat, which is half the price of a privately rented property of the same size in our area. There needs to be more housing to encourage people like us to part-buy/buy out right homes, so that it frees up more housing for people on the waiting list.</p> <p>Also, there is a need for run-down properties/empty properties to be renovated and made available for social housing/affordable housing.</p>
<p>Yes - I am 36 and forced to live at home with my parents due to property prices. We're not second class citizens but are made to feel like them. Not having your own property impacts on many social factors such as relationships and therefore the ability to have children if you cannot afford to move out before the end of childbearing age. Something needs to be done.</p>

I find it surprising that GBC have seen fit to disclose only a brief overview and not full details of their proposals. This makes it very difficult to respond.

With huge pressure on our local countryside and low unemployment around Guildford, the Council should not indulge in any significant house building programme.

Part of rebalancing the economy is that jobs need to be delivered in more deprived areas of the country. That is where Government funds can be justified to support job creation and encourage the provision of new housing, if required.

Private funds can deal with the appropriate upgrading of our own local housing stock, and will be encouraged by market signals that could otherwise be undermined.

I am emphatically not in favour of encouraging groups of people to live on a permanently subsidised basis.

If Guildford is to prosper in the future it must allocate sustainably located greenfield land for housing and business uses. There simply isn't enough viable, deliverable previously-developed within the Borough to accommodate the demand and need for new housing and business uses. By necessity, some of this land will have to be located in the Green Belt.

I believe that the major need in Guildford is for affordable housing and therefore the Council should have a policy of requiring a higher percentage of affordable housing units in any new development. On larger developments, this would be by a number of the units being affordable in perpetuity. On smaller developments, the need could be dealt with by way of a percentage financial contribution.

It is important that appropriate infrastructure is achieved as part of planning gain for development.

Housing schemes should incorporate retail and small business workshops and access to hot-desking or similar office support to encourage entrepreneurship (?) and create a more balanced sustainable community.

Also opportunity for community involvement, such as centres for mixed uses (social, elderly and childcare) and allotments/ growing areas need to be put in and their use encouraged. Existing retail units should be encouraged to open up the spaces above them for housing, especially for younger people, when the town centre is full, then move priority to further afield and possibly new builds/ change of use- office blocks and areas currently set aside for office and commercial development should be forced to be re-assigned to housing uses. This change of priority, requiring stronger planning powers from the local council and the will to use them with emphasis on housing rather than private developer profits and the land banking activities that this leads to - and the evidence is there to see in examples like the big empty space on the Portsmouth Road left for office development, which won't happen as this type of commercial development is now out of fashion and expensive, compared to mobile and home working models.

Locally I see planning permission granted for a development of 2 large "executive" 5 bed houses, but planning permission was declined for 2 smaller, more affordable homes.

I think this consultation is confusing and flawed. It is difficult to make any decisions without any indication of the numerical implications of a choice made. I assume that scenario 1 is the one most likely to achieve the numerical target set out in the original Surrey Plan, but this is by no means clear.

Affordable housing is desperately needed as local families and youngsters are being priced out of the market. However, infrastructure (such as health services) also needs to be provided for as populations grow. More shared ownership schemes would help, and new council housing to stop people having to rely on expensive private renting exploited by landlords aiming to make a profit.

Nowhere is the number of dwellings mentioned in this survey. I am only supporting the previously agreed figure of 317 dwellings per annum.

Infilling of small towns and villages destroys the character of the area and must be stopped. It is better to build new towns with their new infrastructure and green belt.

Gypsy sites should be very small, limited to about 20 caravans maximum, which should cause less friction with neighbours and the police should not be so frightened to visit a smaller site when necessary.

We fundamentally object to any proposal that Guildford Borough Council (GBC) may pursue to set a local level housing requirement figure that fails to appropriately take into account demographic trends, employment growth and housing needs at both the local and sub-regional level, for the reasons outlined below.

Broadly we support scenario 5, whereby a level of housing will be pursued that addresses the need for affordable housing in the borough. However without a specific figure or detailed approach for achieving this, we reserve final judgement on this matter.

Scenario 5 is the only scenario proposed that could ever develop a locally derived housing provision number that could be reasonably regarded as robust, adequately reflecting the findings of the SHMA, and thus survive a detailed examination in public and full sustainability appraisal in conformity with PPS3 and PPS12 and EU legislation.

1. The consultation questions are vague, confusing and ambiguous.
2. The consultation is fundamentally flawed. By not stating any housing numbers it is impossible to know what implications the five scenarios would have on the area, in particular the Green Belt. It is impossible, therefore, to make an informed decision. The Housing numbers should have been published in 2011, not 2012.
3. Each scenario should have had an approximate housing range i.e. "under 200 per year" or "300 – 350 per year" or "400 – 450 per year".
4. The Parish Council wishes to protect the Green Belt from any form of inappropriate development.
5. The Parish Council would support between 317 and 322 homes being built per year (as per the Surrey Structure Plan and the Draft South East Plan). These numbers were generally supported by local residents. There was extremely strong local opposition to number of homes proposed in the final version of the South East Plan (422).
6. The Parish Council appreciates the need for affordable housing for local residents and fully supports affordable housing being built instead of large executive homes, which encourage wealthy retired people into the area pushing property prices beyond the reach of young local people.

7. A significant number of Gypsy/Traveller and Travelling Showpeople pitches are required to address the current deficit. In our opinion these should comprise family units spread evenly around the borough. When a large number of pitches are concentrated within a small geographical area, it results in a potentially dangerous breakdown in community cohesion and puts considerable pressure on schools, police, local authorities etc.
8. Traffic congestion is already a significant issue in the Borough. The existing infrastructure is at capacity. It is important to recognise that new development cannot address any existing infrastructure or service deficiencies. How will the current problems be addressed?

I would support housing in areas that could be redeveloped however could never support building on-mass in the countryside. It would be good though to see small groups of starter homes (5 or less) built within villages to give local people a chance to stay within the community they were brought up in.

Areas closer to the town centre should, where possible, be redeveloped such that apartment blocks become the norm. Average internal space should be between 75 and 120 sq meters per apartment. Apartment blocks should not be high-rise but limited to four or five storeys.

The ground floors should be set aside for small retail outlets. Where such development takes place it will naturally spread the retail area out so benefitting the community (shorter walk to local shops, less use of cars, lower rents and rates per shop, etc). Road layouts to be changed to allow more pedestrian zones. Underground parking to be provided for each new apartment block.

This type of development will generally have the effect of leaving the "up-market" retailers in the High Street area whilst increasing the number of smaller less-specialised retailers amongst the residential areas around the new apartment blocks.

This has the added advantages of a) preserving amenity land and productive farm land surrounding the built up areas, b) encouraging less use of cars in shopping, c) better, safer and more appropriate parking, d) development of "neighbourhoods", e) providing accommodation which can be a mix of both affordable housing and other, by careful siting of these types of buildings, f) enables both population growth and economic growth without undue pressure on local services.

Between the central areas of Guildford and the outer edges of the town apartment blocks should give way to individual houses although this can remain mixed. The problem I see is that the current borough plan tends to separate residential areas from retail outlets whereas smaller retail outlets (e.g. bakeries, grocers, etc) can equally be spread around the borough but within residential areas using ground floors of the apartment blocks in a similar way prevalent in many parts of Europe (particularly in Spain).

Generally my view is that we must make far better use of all land by building upwards (in the method described above) in existing urban zones and preserving the amenity and agricultural land elsewhere.

Members of Pirbright Parish Council agreed that the response form was difficult to complete because the nature of the questions did not allow for the complexity of the issues being posed and disagreed with the view that affordable housing might be inconsistent with lower growth.

I have deep concerns about the scenarios set out on pages 26-28 of the Topic Paper for the following reasons:

- The scenarios give no indication of the availability of sites for development and the differing amounts of housing which could be built on available sites with consequences and benefits.
- The scenarios set out choices, without actually indicating the housing numbers in the choices to be made. The reason given for not giving numbers (p.39) is that people would not understand them. However, without numbers being explained and their consequences as well as benefits being outlined, choices cannot be made.
- The environmental consequences for Guildford for each scenario are not explained. For instance, it is not known whether any of the scenarios would entail building on the Green Belt, the AONB, in the countryside or cramming the town, and thereby damaging its character.

It is not possible to make choices without this knowledge

- There is an assumption that continued forced growth over many years is sustainable. However the guiding principle for growth must be sustainable development. For Guildford sustainable growth not only encompasses housing need, but the preservation of its unique historic character, countryside and scenery for future generations. *(Compensation, mitigation or extra payments to make unsustainable development appear sustainable, can simply be a way of side-stepping the issue by finding reasons for unsustainable practice.)*
- It needs to be explained how it is ascertained that market housing built will provide for local needs, rather than for those working in London or outside Guildford, thereby increasing traffic congestion and keeping house prices at high levels.
- There needs to be a greater emphasis on the difficulties in expanding further, a gap town with a very small town centre, narrow streets and a hilly topography, and which is surrounded on three sides by Green Belt, without damaging its character and assets.
- The scenarios reassure that contributions from development will provide some of the infrastructure. However, Guildford has a reputation for heavy traffic which renders it a less attractive place to live and work; infrastructure is needed not just for individual developments, but for an over-all plan to solve Guildford's traffic problems as it expands.

I currently wish to live in Guildford, but unfortunately this cannot be the case as even the rent is much higher than all of the surrounding areas. Everybody says the same thing and agrees that the rent and house prices and Guildford are far too high and we really don't understand why. The quality of housing to rent is also very old and bad. There's one development called Trinity Gate at the top of the high street and that's about the only desirable place really. Shame, as I like Guildford a lot, but just like many we are forced out due to rising costs.

Comment on Statement 1 If it were clearly stated that 'affordable housing' meant ONLY rural exception sites purely for Effingham people, the Parish Council would consider supporting this.

Comment on Statement 8

The Parish Council believes that all Green Belt countryside needs absolute protection.

Comment on Scenarios

The Parish Council believes this is putting the cart before the horse. If it were known what the demand is, it would be possible to comment more effectively here, and also on the later section Types of Housing.

Is a very difficult subject, the biggest problem is the road cannot accommodate any increase in population.

I consider that the consultation is flawed and that as result the value of the "evidence" it produces will be undermined and made unsound.

The questions asked are misleading and designed to solicit replies that do not consider adequately the implications of what would result from the answers given.

They do not make clear that affordable housing will be built under all scenarios. There is no way to indicate that the countryside should remain protected by the existing policy structure (AONB, AGLV, and Green Belt) whilst allowing limited affordable housing to meet local demand at villages where it is required as sustainable development.

There is no reference to the Green Belt which is a vital element in protecting the character and identity of the town of Guildford, its villages and surrounding countryside from linear development and urban sprawl. The Green Belt is one of the best understood planning terms known to the public at large.

I do not consider that the way in which the Gypsy and Showman section is added to the questionnaire represents adequately the complexity of the issues at stake.

Because there is no indication of the number of houses each scenario involves, and because of the way in which the scenario options are presented, it is not possible to indicate the view that Guildford's topography and heritage as a gap town within the Surrey Hills AONB precludes it from growing larger as a residential and business centre without its loss of identity, character and sense of place.

It needs to be made clear that further housing growth cannot be considered seriously unless the creaking infrastructure of the town is restored by significant financial investment over many years, particularly as regards the A3 and A31.

CPRE has already written to [REDACTED] of the GBC Planning Policy team expressing its major reservations about the consultation process.

I am concerned about the number of mini estates that are being built on a single large plot. A large house with a large garden is being bought by developers and knocked down to build 4-5 new family homes. This has happened a lot in the Effingham/Bookham/Fetcham/Horsley area. The Howard secondary school is already oversubscribed and existing families struggle to get children in. No provision is being made to extend the Howard or build another school to accommodate all these children. This cannot continue.

Areas closer to the town centre should, where possible, be redeveloped such that apartment blocks become the norm. Average internal space should be between 75 and 120 sq meters per apartment. Apartment blocks should not be high-rise but limited to four or five storeys. The ground floors should be set aside for small retail outlets. Where such development takes

place it will naturally spread the retail area out so benefitting the community (shorter walk to local shops, less use of cars, lower rents and rates per shop, etc). Road layouts to be changed to allow more pedestrian zones. Underground parking to be provided for each new apartment block.

This type of development will generally have the effect of leaving the "up-market" retailers in the High Street area whilst increasing the number of smaller less-specialised retailers amongst the residential areas around the new apartment blocks.

This has the added advantages of a) preserving amenity land and productive farm land surrounding the built up areas, b) encouraging less use of cars in shopping, c) better, safer and more appropriate parking, d) development of "neighbourhoods", e) providing accommodation which can be a mix of both affordable housing and other, by careful siting of these types of buildings, f) enables both population growth and economic growth without undue pressure on local services.

Between the central areas of Guildford and the outer edges of the town apartment blocks should give way to individual houses although this can remain mixed. The problem I see is that the current borough plan tends to separate residential areas from retail outlets whereas smaller retail outlets (e.g. bakeries, grocers, etc) can equally be spread around the borough but within residential areas using ground floors of the apartment blocks in a similar way prevalent in many parts of Europe (particularly in Spain).

Generally my view is that we must make far better use of all land by building upwards (in the method described above) in existing urban zones and preserving the amenity and agricultural land elsewhere.

Firstly, there are enough houses in the area, after all, everyone lives in a house. The problem is that there are too many landlords with multiple properties. If people could only own one or 2 houses, the price of houses would fall, and everyone could own the one they live in.

Also, Surrey is one of the most desirable and expensive places to live in the country. Is there a plan of having less affordable housing here and more in cheaper areas, as other elements of life are more expensive here too, meaning those with less money may still not have enough money to live here. Guildford needs more commuter housing or housing for professionals who bring the money to the area.

This is a very difficult subject, the biggest problem is the road cannot accommodate any increase in population.

We would like to take this opportunity to comment on this section of the housing questionnaire.

Firstly we are pleased that the council wants to provide for the backlog and plan properly for future needs.

We are however very disappointed to see that the intention of the council to undertake another GTAA and then find sites. This does mean yet further delay after many years of lack of provision. The council lays put no time scale for this provision. The matter is urgent and should be addressed as soon as possible. We are disappointed that the council, will merely seek to make provision rather than committing itself to making full provision to meet need.

The existing GTAA has been tested at the RSS EiP in Feb 2010 who found that there was a need for 151 pitches in West Surrey and 47 pitches for Guildford to 2016. Clearly the EiP though unfinished (and released to ourselves through a FOI) is a material consideration. It did find serious problems with the GTAA for the area and made some adjustments.

We think that the council should act now, not wait for a future GTAA, and develop a fast track dedicated DPD to make sites allocations for Gypsy, Traveller and Travelling Showpeople needs. Failure to do so may mean several more years of delay. In view of the failure to make full provision in the past and the backlog of need this must surely be inexcusable.

It is necessary for the local authorities to be more willing to use land to build affordable homes (and by affordable I mean cheap). There is a proliferation of large, expensive houses in the greater Guildford area and action on housing should include compulsory purchase and demolition of very large houses to accommodate the need for medium-sized council houses with smaller

It is difficult to give a true reflection of our views in the questionnaire format. In particular, in responding to questions it may be assumed that we agree with the premise on which the question is based, which is not always the case. Also our answers have to be based on the capacity of our area, which is now severely limited, as well as the need of present residents. We would like to qualify and amplify our responses as follows:

The context of our response.

The HTAG area covers much of the urban part of Holy Trinity Ward. We represent 500 plus households.

The area includes a large number of small Victorian houses which are in Conservation Areas. These provide attractive small 2 (sometimes 3) bedroom homes for couples and small families. However they are relatively expensive and cannot be considered "affordable". They must be preserved, and their place in housing provision needs to be recognised.

Many houses that were once modest 3-bed ones, often semis, have had large extensions which have changed them to quite large 4-bed homes. This has reduced the stock of modest 3 - bed houses, and few new ones have been provided. We suggest that this continuing trend needs to be taken into account in assessing future needs.

There is little social affordable housing in the area.

Over recent years there has been a considerable amount of "infilling" of various types.

There is some scope for adding more dwellings, including Bright Hill, but this is very limited if the quality of the area is to be maintained for present and future generations and thus to be genuinely sustainable.

We believe that a good mix of housing adds to the quality of the area.

2. Clarification of our responses.

1. Affordable housing - support. We interpret this in its widest sense so that it includes modest private housing with a reasonable market price, as well as "social" housing. The need is for more small family houses, rather than more flats or large houses.

2. Enough new housing - neutral. This response is based on the very limited capacity of our area to accommodate extra housing, rather than the identified need. A significant increase in overall density, already quite high, would degrade the quality of the area for everyone and so be unsustainable. In particular the areas of small Victorian houses must be regarded as "full up".

3. Funds for Community / Infrastructure - support. We assume this refers to S106 / Infrastructure Levy. We consider that the present system has failed to meet the increased

infrastructure need - particularly for urban and green open space, and for pedestrian facilities; this has, at the moment, to be viewed as a constraint in itself to additional housing

4. Only a small amount of additional housing - support. Reason for this response is as for 2 above.

5. Housing to support the local economy - neutral. This depends on the economy sector to be supported. We would support affordable housing to reduce commuting-in by shop employees (but not to encourage further large expansion of this sector), and low cost housing for local science / manufacturing industry employees, but not more large houses for the Financial Services sector. We would welcome housing that supported the public sector services by providing homes in our community for nurses, care workers, teachers etc.

6. Accommodate more jobs - neutral. There is no real scope to increase jobs within our own area, and only limited capacity in Guildford as a whole. We consider that an economic growth objective should not itself be a driver for additional housing. The balance needs to be shifted from retail sector growth, which can only increase inward commuting, to research and manufacturing which might reduce out-commuting.

7. More jobs to ease out-commuting - support with the objectives as 6 above.

8. Protect all countryside land - support (but with comment as 9 below). We relate this to our own area, where the adjacent countryside land is all Green Belt / AONB. This is vital in providing adjacent green open space and any loss would degrade the quality of life for residents. This need not necessarily constrain the local economy; the objective should be to provide more appropriate local jobs that would be taken by some of the large number who currently commute out - particularly to London.

9. Protect most important countryside land but release some - support. There are some very limited green field areas around Guildford that it might be acceptable to develop, and perhaps also some scope for changing (but not reducing), green belt area. The extent of surrounding Green Belt must not be reduced in total. Housing should be the priority use rather than employment.

10. Only accommodate a limited number of new homes - support. We do not accept that this would not help those in most need of accommodation. Priority would be given to affordable and low cost housing, and it would be reasonable, in order to achieve a better balance in our area, for the affordable part of new residential developments outside our area to be located within the HTAG area. Some incentive or control is also required for the limited new developments that are possible in our area to favour modest "low cost" housing rather than more large and expensive ones.

3. Scenario.

We chose Scenario One, which seems to require the lowest level of new housing. We would expect this to be slightly less than the draft SE Plan figure of 322 dwellings per year, which we feel is appropriate for Guildford's needs as we understand them, and appropriate to the various issues outlined above.

5. Types of Housing.

Support;

Affordable housing, both flats and houses Two/three bedroom private market houses Purpose-built retirement homes Sheltered accommodation/apartments for those over 55 years old The provision of both modest size private retirement homes, and sheltered accommodation within our area, and close to the centre, would encourage the elderly to move as they could stay in the area they know and where their friends are; this would free up some family housing. We suggest that 65 would be a more appropriate age for this

housing.

We have not discussed the issue of Gypsy / Travellers pitches.

I hope that serious consideration can be given to contributing to satisfying housing needs by encouraging brownfield development in Guildford town. The whole area around and including the bus station is ugly and inefficiently used, for example.

In essence, we submit that the choice of housing target must fundamentally be derived from the evidence base, otherwise both it and the Core Strategy which details it, will be found unsound. Public opinion clearly has a legitimate role to play in the process but should not usurp clear technical evidence. In this case it is evident that there is a need for an increase in housing provision over and above that proposed in the South East Plan. Unless this is reflected in the strategy existing problems of affordability will worsen with progressively more severe impacts on the economic strength, social vitality and infrastructure of the Borough.

Thus we *support* Statements 1, 5 and 9. We are *neutral* in respect of Statement 7, and we *disagree* with Statements 2, 3, 4, 6, 8 and 10. We support Scenario 5.

Everyone needs a place to live and a lot of us can hardly afford to live around this area which we call home so full support for affordable housing. I don't want to see countryside land be destroyed but I believe that it could be moved and areas that require the conservation should be spared and houses can be built around it.

I am elderly and would like a small house to live in, in Shackleford. I feel there is nothing small in Shackleford and I find I can't cope with a larger house. I don't want small houses to be built which then get enlarged. It is not just me who feels like this and I no several elderly friends who feel this way."

Two new houses being built in Warwicks road worth over £2 million and I am surprised - thought that the need was for more affordable housing. They look nice but are over the top with further extra's being added on.

I feel new houses should be affordable - seem to be building large houses but then placing them close together. I know other people feel this way in the area.

The Estate is concerned to ensure that there is sufficient supply of affordable housing to accommodate both Estate staff, and people who work at the large number of companies that supply, and are supplied by the Estate.

We recognise therefore that the fortunes of the Estate are bound to those of the communities around us. We want to see those communities allowed to prosper and thrive.

The University supports the setting of a local housing requirement, which will enable greater certainty about future housing provision and help to avoid ad hoc development and planning by appeal.

Key considerations in setting a local housing requirement

It is important that the housing requirement is set realistically and in the light of evidence about local housing need, and the principle that everyone should have the opportunity to have a decent home.

The University agrees that Diagram A identifies the key factors that contribute to setting the housing requirement. It is important that local opinion is canvassed in evidence gathering,

but it is also important that this encompasses the full range of potential opinion, including business as well as residents, and that the economic factors, demographic factors and housing factors are not made subservient to local opinion when final decisions on the requirement are made. Where the technical work and local opinion disagree, then it should be the technical work that is given greater weight, since this provides the hard evidence of demand and need.

This means that the requirement should not be artificially constrained by local opposition to the release of greenfield land for development and instead is set with reference to evidence based positive planning which aims to meet strategic aspirations for improving the economy and prosperity of the Borough, and provide improvements to housing supply to meet local need and demand, providing housing for local people.

Although no figures are given, the evidence set out in the topic paper regarding economic growth, labour demand and supply, housing demand, need, and supply, and related topics, indicates that the housing requirement is likely to be significant.

Scenarios

The University considers that Scenario 5, a level of housing that will help to address the need for affordable homes, should be pursued. There would appear to be no real benefit in pursuing other scenarios which are based solely on demographic change, or partially meeting demand with limited need for affordable homes, since these will have consequences such as constraining economic growth, pushing up house prices (already very high on average), and failing to provide enough affordable homes.

We think that the approach of the consultation will not work in that it will generate high numbers that would lead to unsustainable expansion plans. We consider that the most sustainable approach has to be to work up from an assessment of capacity and to ensure development is conditional on infrastructure investment. The questionnaire, on the contrary, follows a predict and provide strategy.

We have encouraged individual returns but consider the questionnaire not to be appropriate to organisations who have been previously involved with housing plans. The questionnaire avoids the issues that have dominated the housing debate in the town over recent years. These issues are all about how much new housing the Borough can accommodate and at what level of new housing it would be necessary to review Green Belt boundaries. These issues have been debated at great length during the formative stages of the Surrey Structure Plan and the South East Plan. The Society has been much involved in these debates. It appears that many people would accept about 320 new dwellings per year for a few years, i.e the housing proposed in the Surrey Structure Plan. Very many people, and our Society, objected strongly to the figure of about 420 dwellings per year in the South East Plan.

People's reasons, as far as we know, are that they judge that a level above about 320 will have damaging environmental effects and will diminish their quality of life. There is much scepticism, shared by our Society, that infrastructure sufficient for even the lower build rate will be provided.

We support more affordable housing (question 1) and disagree that there should be no more new housing at all (question 2). With regard to questions 6 and 7 we have argued strongly that Guildford should not be a growth 'hub' or 'centre for significant change'. We think the topographical and infrastructure constraints of the town limit its ability to sustain population and economic growth. We have answered 'neutral' to all of the questions 3 to 10 either because they are not related to constraints, or because they are not quantified or because we do not agree with the claimed effects or because they are not related to target levels of

build (e.g. in questions 8 and 9).

We have not entered support for any of the scenarios because they are not set in the context of their environmental effects. The kind of scenario we would support is one providing a number of new dwellings per year for a few years consistent with an assessment of capacity without using Green Belt and with a substantial proportion of affordable housing: we think this would result in a target figure at or below the Surrey Structure Plan figure. There would then be a need for another assessment in a few years time.

In the final question we would like to see a mix of housing types and we have no view on housing for gypsies and travellers. We would welcome a discussion or workshop for informed debate, and note that the topic paper contains much information that would be useful in such a debate.

The results of West Horsley Parish Council's Housing Needs Survey (carried out with The Rural Housing Trust) published in July 2004 are still relevant in 2011, 7 years later. Whilst a site that would take 6 to 8 new homes, was offered at no cost to the Parish Council in 2004, the later Site Investigation identified that a considerable amount of ground remediation would be required to deal with low grade contamination.

It is suggested that Guildford Borough Council levies an Affordable Housing Contribution tariff on all developers and house builders building homes of more than 3 bedrooms in the Identified Rural Settlements [Rural Environment policy RE2] in order to create a Rural Affordable Housing Fund to enable the 'kick-starting' of schemes in the Identified Settlements. The Affordable Housing Contribution tariff would apply to ONE or more new houses built by developers / house builders. A 20% of market value fee is suggested but the tariff might also be drawn up on a fixed level of contribution per bedroom or per square metre of floor space in a new dwelling, e.g. £10,000 per bedroom; £100 per sq metre.

Such a policy it is thought would help to restrain the number of 4. 5 or more bedroomed homes being built in the Horsleys and might even force developers / house builders to build the smaller more affordable dwellings that are really required.

While Guildford remains an attractive place to live and work housing demand is always likely to exceed supply.

We do not believe that Guildford Borough Council would deliberately set out to make Guildford less attractive in order to get a better balance between supply and demand, but it could do so by accident. For example, in order to increase the amount of housing on the same area of already developed land it could continue to support high housing densities. In the DEFRA site development (which is in the Downsedge area) careful thought has been given to lay out, house design and open space but if you walk round the site the sheer volume of buildings is oppressive because the density is 30 dwellings per hectare. Multiply this across Guildford and its attractiveness as a place to live and work would be jeopardised.

Although care has obviously been taken with the wording of the statements in the survey we find them flawed because they appear to push the respondents into supporting large numbers of new dwellings. To counteract this we have supported the statements and scenario which imply low housing growth.

In the question about type of housing we would have liked to have ticked 'affordable housing' but were unable to do so because it referred to both houses and flats and we consider that enough flats have been built in Guildford.

We have seen (in draft) a comment from another body which suggests that setting targets

for housing numbers is the wrong approach and that the starting point should be an assessment of the capacity of the area and its infrastructure to support additional housing. We find this an attractive argument (although probably difficult and contentious to implement) and hope that GBC Planning Policy will consider it.

We also consider that Guildford should not be treated in isolation as other developments in Surrey and beyond (e.g. the new town at Whitehill/Bordon if it comes off) might absorb some population growth.

I have been trying to fill out your 'who needs housing' form and it gets to section 5 and will not go any further, if it helps I am broadly in favour of additional housing and I am willing to be contacted in the future.

All 5 scenarios state that 'new housing would create more pressure on existing infrastructure (roads, schools etc)'. The roads in and around Guildford are saturated, and any development would make this worse, so may be it is time to think of different solutions. An additional train station between Wanborough and Guildford could serve, Park Barn, the Research Park, and RSC Hospital and ease traffic on the A323, the A31 and the A3. An additional station at Merrow between W Clandon and Guildford London Road would ease traffic on the A246. Some sort of tramway along the dis-used railway line from Cranleigh, perhaps running alongside the A281 from Shalford, would ease road traffic on the A281. None of these are easy options, but something needs to be done about the transport infrastructure. Restricting parking does not work if there are no alternatives to road transport. I have expressed my views to both [REDACTED] (some time ago) and [REDACTED]. Please give this some serious thought.

I fear that the nature of Guildford town, its position and topography are likely not to be sufficiently considered in a rush to growth. Guildford must not be allowed to become a characterless urban sprawl. The demand to live, work and shop here is potentially limitless but straining our town beyond a sensible capacity will destroy what residents & visitors love about the place.

Is this demand for more & more houses, more & more shops, more & more jobs a "wish list divorced from capacity"? As assessment of Guildford's capacity must surely come first, and development must be conditional upon the provision of the necessary infrastructure - and there is already a backlog to be caught up on: just look at our clogged roads for example.

Residents of Guildford successfully fought against the South-East Plan; we don't wish to see a similar home-grown version appear in its place.

We believe that the controlled release of Green Belt land in conjunction with a revision of settlement boundaries should be planned to enable housing targets to be met. In line with statement 5 of the response form, this would increase the availability of suitable accommodation and support the local economy.

I struggle with the scenarios as you do not provide any sort of quantification as to what they mean. I believe that Guildford has constraints that limit the amount of housing that it can accommodate (e.g. narrow streets, AONB, flood plain). This may not restrict economic activity as I anticipate huge changes in the way people work in the future (electronic communications, working from home etc). I would much prefer an approach based upon assessing Guildford's capacity for new housing and then ensuring within this that an adequate % is reserved for affordable housing.

I objected to the proposal in the SE Plan for nominating Guildford as a "growth hub" as I do

not believe that its topography equips it for this role. It can grow in the knowledge industry, though even here I would not like to see the University expand further as this results in student demand for houses to the disadvantage of local residents. Further, I do not believe that Guildford has to compete on the quantity of its retail offering with Kingston or other major centres and nor do I believe that it is a suitable location for industry.

I also am not satisfied that the impact on more housing on the infrastructure of Guildford is properly considered in this questionnaire. Guildford has an infrastructure deficit now and I believe that housing growth should only occur if there is a direct linkage between this and the provision of improved infrastructure. The word "should" in your scenarios is far too weak in my view.

Guildford desperately needs a longer term plan covering its infrastructure needs and this will help with the provision of more housing and more centres of employment. Only if this is done can it be sensibly debated if changes to the green belt boundaries are necessary. This is why I have answered "neutral" to many of your questions. I believe that such a plan would better enable the town to demand the cooperation of other bodies to alleviate its infrastructure needs and progress its plans for development e.g. in Slyfield.

Thank you for allowing Thames Water Utilities Ltd (Thames Water) to comment regarding the above. As you will be aware from previous consultation responses, Thames Water are the statutory sewerage undertaker for the whole of the Guildford Borough and water undertaker for the southern part of the Borough and are hence a "specific consultation body" in accordance with the Town & Country Planning (Local Development) Regulations 2004 (as amended in May 2008). The provision of sewerage/waste water and water infrastructure is essential to all development.

We have the following comments on the consultation document:

It is important that we are made aware of any changes to housing targets as soon as possible so that we know where we need to direct our investment in new infrastructure.

The water companies' investment programmes are based on a 5 year cycle known as the Asset Management Plan (AMP) process. We are currently in the AMP5 period which runs from 1st April 2010 to 31st March 2015. AMP6 will cover the period from 1st April 2015 to 31st March 2020 and we have yet to submit our Business Plan to OFWAT for this period. Our draft Business Plan for AMP6 will be submitted to OFWAT in August 2013.

As part of our five year business plan review Thames Water advise OFWAT on the funding required to accommodate growth in our networks and at all our treatment works. As a result we base our investment programmes on development plan allocations which form the clearest picture of the shape of the community (as mentioned in PPS12).

If the housing assessment shows there is a greater or lesser need for development this will change the number of development sites and their delivery date which could increase / reduce the need for infrastructure to serve these developments.

It is essential that developers demonstrate that adequate capacity exists both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing water & sewerage infrastructure. Where there is a capacity problem and no improvements are programmed by the water company, then the developer needs to contact the water authority to agree what improvements are required and how they will be funded prior to any occupation of the development.

We rely heavily on the planning process to ensure we have the necessary infrastructure in areas where development is clearly identified and seek planning conditions where it is not. Capacity problems, possibly leading to flooding, could occur in some cases if we have not been given the opportunity, either through advance planning or through conditional planning approvals, to provide the capacity prior to the development taking place.

If the developer fails to consult with Thames Water in the early planning stages then, as noted above, this will lead to us requesting a Grampian style condition or potentially objecting to the application.

I assume by 'additional housing' you mean over and above the average of 340pa for the last 10yrs. You give no indication over whether 'additional' is 5 or 500. This question is ambiguous.

Why have so few affordable houses been built? 147 of 680 in the last 2 years. As we have such a shortage of affordable surely the local planning should have insisted on a better ratio. How will this be improved in future? Affordable housing will not take as much land as 4-5 bed roomed with en suite.

Essential new infrastructure and amenities must be paid for by GBC/SCC or the builder, not by bartering with and reducing the amount of low cost housing. 'Affordable' still needs basic requirements of parking and 'green space'. Student accom should be provided by the Uni. Some resident may wish/ need to have a paying student lodger. How many 5 bed do we already have? Do we really need more, even if they do produce most profit for builders?

Guildford urgently needs improved road systems, which builders will not provide. The A3 entry and exits south are only at the already jammed Wooden Bridge; Guildford bottlenecks at the Wooden Bridge (A3, Hospital, Uni, Tesco) anyway. Once the Hindhead tunnel is open this bottleneck will become even more obvious. The river bridges gyratory, which even includes Godalming/Hogs back traffic is another problem. Traffic going south from London hits Ripley and Clandon, both totally unsuited to heavy lorries.

7. is another unclear question. Creating more jobs does not equal fewer commuters. People who work in London are unlikely to find equivalent jobs in Guildford. As an aside, the rail service to London is dreadful in the rush hour.

8 and 9. Green belt is a tricky question. No I do not want to lose any green belt and countryside. Nor do I want to see Guildford gradually sprawl to incorporate Clandon and then on to Horsley, Effingham and so on. However people need homes. Green belt, countryside is essential for our well being as well as to sustain our bird and wildlife populations. It would be tragic if Guildford became another vast expanding urban building plot. We are so lucky that previous generations of Guildfordians had sufficient insight to preserve green land around the town by buying it to prevent development. I for one, have a sense of pleasure every time I walk down the High Street and look at the rolling green of the hills beyond. So in conclusion my proposal is Scenario Zero

1. see / Highways Agency to radically improve the road system around and through Guildford.

2. New planning requests to have a compulsory high proportion of low cost housing with parking (as there isn't any road parking) and green space. Low cost housing numbers are not to be eroded when builders are required to improve infrastructure.

3. Council houses back from those who can pay to rent or buy and made available for those

who can't afford to rent or buy. New 'council houses' that cannot be bought.

4. With maybe a few larger houses

5.No encroachment onto green belt just fewer large houses and a sensible use of other space to fit in more affordable housing. Presumably if GBC gets any gvt money for housing the gvt does not say they have to be 4-5 bed with en suite?

I am very concerned that the area cannot accommodate any significant increase in housing numbers. There is already insufficient infrastructure to support the residents we have. Public transport is totally inadequate. Bus services are being constantly reduced to such an inconvenient level that the public stop using them and the service is then further curtailed. Schools are under huge pressure and parents are having to send their children to quite inconveniently located schools, often having to make school runs in two opposite directions. Medical services are stretched. The state of the roads - appalling. Parking is already inadequate Gypsies and Travellers may well have a right to a nomadic life, and GBC may be obliged to provide some suitable sites for that purpose, but with that "right" must come "obligation" by the Travellers to live in a neighbourly manner and make their financial contributions to society like the rest of us.

I am very concerned that your survey will be driven by the business community who will consider that the greater the expansion the greater will be their markets and financial gains. Guildford is sandwiched between the river and the hills and expansion is not an endless option. I appreciate that some sensitive growth is inevitable, but most of us live here because WE LIKE IT. And we pay handsomely for the privilege of living here by way of taxes, housing prices, general cost of goods and services. Most of us do not want to see the beautiful town and countryside in which we live, ruined beyond redemption. Town planners must tread a cautious line between providing some growth without killing off that which makes this whole area so appealing to both businesses and residents.

The Northumberland Estate is committed to ensuring sustainable and proportional growth to preserve vitality and village services and engender economic growth.

A Village Plan for Albury

Introduction

Guildford Borough remains an attractive place in which to live and work and one outcome of this is pressure to release land for all forms of development. The Council is currently preparing a new development strategy for the area for the period up to 2026 which will help to shape the future of its settlements. The Council will need to provide around 3-400 houses each year throughout this period. There is very significant pressure to provide affordable as well as market housing, and most settlements will need to contribute towards meeting the Boroughs housing needs.

Most development will be located in the Borough's three main towns and larger district centres, with smaller scale developments in sustainable village locations, like Albury.

The Northumberland Estates is the main landowner in Albury and the surrounding vicinity, with farmland, housing, commercial and community property within its control. The Estate has a long term interest in the village, both as an owner and investor, and is committed to retaining a strong and vibrant community going forward.

Our key objectives are:

to maintain a mixed community, including younger people and families
to maintain and improve local facilities

to reduce congestion and manage car parking
to improve linkages between parts of the village
to create a vibrant village centre to improve the landscape setting
to encourage small scale local employment
to contribute to meeting local housing needs
to encourage highest standards of design, sympathetic to the village

This report sets out proposals by The Northumberland Estates in relation to future planning at Albury for the period to 2026, in the form of a village plan, and is set out under a number of topic headings.

Housing

The plan should consider the scale and type of any new housing, the preferred locations, and whether housing development can deliver other community benefits.

Northumberland Estates proposes three sites for new housing, which would be a mix of private housing for sale and affordable housing to let. In total it is proposed that around 30 to 50 houses are developed over the next 15 years. This would be compatible with the scale of the village and its historic development. Design will be critical to ensure that any new development adds to and complements the traditional village, as will the need to use sustainable building techniques and renewable energy forms. The houses should as a minimum provide for code level 4 Sustainable Homes and level 114 of Homes for Life. A range of house types and development densities appropriate to each site would be considered.

In order to continue to encourage a mixed community, and particularly to retain younger people and families within the village, the provision of affordable housing will be essential. Normally this would be provided in conjunction with a Registered Social Landlord and subsidised through the Homes and Communities Agency, however delivery of affordable housing will need to be carefully examined in the light of public spending reviews and the continued availability of funding. Private housing will not only continue to provide for strong market demand in the area, but will also provide the opportunity to deliver affordable housing and potentially other community benefits, for example through provision of social and physical infrastructure. Around 40% of the houses proposed would be affordable homes that would be available either to rent or buy. The homes would remain affordable in perpetuity, and allocated to local people or those with a family or work connection to the area or surrounding parishes.

The housing sites have been forwarded to Guildford Council through their Strategic Housing Land Availability Assessment (SHLAA) to be considered for future development and comprise:

1. Land north of Church Lane and west of Weston Fields, Albury 3.0 acres Agricultural 15-25 private/ affordable
2. Land south of Church Lane, east of Birmingham Farm 2.5 acres Agricultural 8-12 low density private/ affordable
3. Land south of Church Lane and east of Church, Albury 1.5 acres Vacant, surrounding area residential, Church and agriculture 10-15 in two phases - private/affordable

Development of any of these sites will need to be considered in detail within the context of planning policies, including Area of Outstanding Natural Beauty, Green Belt, Conservation Area, Geo-morphological Areas, Area of High Landscape Value and Listed Buildings.

Transportation

As car usage increases nationally there is a need to ensure that measures are undertaken to consider how existing issues of congestion can be addressed and to how any new

development proposals may impact upon the village.

Existing problems occur through the level of traffic and traffic speeds at peak times, the capacity of existing roads and through on street parking.

Potential measures to improve this situation may include:

traffic calming

local highway improvements

public transport improvements

car parking provision

improving local accessibility to services by means other than private car

ensuring new developments do not create new problems

The village plan sets out the following proposals:

1. A new car park with increased capacity to the north of the village Hall and Tillingbourne
2. Improvement to on street parking on main through routes
3. Improvements to public footpaths and cycleways
4. Improvements to public transport facilities.

Local services

The opportunity to strengthen village services should be addressed. Albury like many similar sized settlements has seen a gradual reduction in village services. Maintenance and strengthening of services will be assisted by new housing. Particularly family housing, but consideration of a new shop elsewhere in the village would both strengthen community services and relieve the village of a hazard and congestion related to on-street parking at the existing post office.

The plan proposals include a larger store which would increase viability of maintaining a local shop in the long term. The scale of any new commercial development should remain in keeping with the village, but other small scale, possibility specialist shopping or a coffee shop may be viable. This would assist in maintaining local employment and creating a focus to the village.

Open Space and Recreation

Improvements to local play facilities, improvements to formal accessible open space and improvements to local footpaths and cycle routes should be encouraged with any new development. The opportunity to enhance access to the surrounding countryside, such as along the riverside would be examined. The existing village play area is rather unexciting, reflecting limited funding and could be re-modelled.

Employment

Bringing employment back to the village would improve its vitality as a living/working community. This could include craft workshops or small scale business units, allowing people to live and work in the village. The use of IT means that many small businesses are more mobile in their locational requirements and would support village services during the day time. Located with new parking and other services these would contribute to providing a strong focus to the community. The Albury Estate office could area could also be a suitable location for small scale business start ups.

Landscape and Amenity

The setting of Albury in an area of High Landscape Value is one of its great attractions. Landscape renewal and improvement should be considered to enhance the village setting, and improve biodiversity. A village design guide, looking at landscape, streetscape and village identity would assist in ensuring that any development adds to that which is already valued and promotes a sense of place.

Delivery

With the exception of private housing and possibly business or shopping, the ability to deliver tangible improvements will be limited. Public funding sources will diminish in the short to medium term and priorities for the public sector will lie elsewhere. It is therefore necessary to be realistic about what can and cannot be achieved, and to ensure that improvements to the village are properly costed. The principle source of funding will be through planning gain, but the scale of development is fairly modest – a few houses a year over the plan period. However it is often possible to obtain match funding from various sources, for example for sports and recreation improvements if there is an initial private sector source to be relied upon. It is therefore necessary to take a comprehensive approach to the village plan and consider what it can deliver 'in the round'. A piecemeal and un-coordinated approach is likely to be of least benefit to the village as a whole.

Next steps

Consultation on the overall plan is essential. Nearly all of the proposals will benefit from local input from the community and local organizations. It is important also that the consultation sets out the whole picture of what is proposed with an understanding of the scale and the timescales over which the plan may take place. Shaping the plan through an examination of individual and overall components will lead to greater certainty and a sense of direction for the settlement as a whole.

You have asked me for my views on the level of new housing to plan for in the local area. I have lived in Guildford for the past 36 years but am now 87 years old, so I am not certain as to the value of my thoughts, particularly as I am not happy about some of the developments which have taken place during this period.

- a) According to last week's "Surrey Advertiser" Guildford has been ranked as "one of the most congested areas in Europe". I have watched this development over the years and I have felt that to some extent Guildford has "lost its soul", particularly with many large stores driving out the former very interesting small shops. I do not see any way back as the road system often little hope of curing the traffic situation.
- b) Guildford, has become a "high tech" town and I think that any further influx of workers will tend to be smallish number of highly skilled people.
- c) We already have large number of people involved in the University and the Royal Surrey Hospital who if not already catered for with housing will need to be. Leaving this aside I should have thought that the requirement for new housing, affordable and specialist in the local area needs to be controlled within sever limits and be built mainly in areas to the North east and possibly northwest of Guildford.

Any further unplanned growth, against the towns inadequate and untainable traffic system will have a very wide affect on what still remains

1.2 We have reviewed the consultation document, the related topic paper and sustainability appraisal. Our response focuses on the matters raised in the consultation in terms of the scale of housing provision – ie. the ten Statements and five Scenarios.

1.3 This statement explains the responses we have given for these matters on the questionnaire. It does not provide any additional elaboration in respect of housing types which we have however answered on the questionnaire.

1.4 The statement is structured as follows. Section Two provides a review of national policy and other material considerations. Section Three details our responses to the ten Statements and Section Four does the same in respect of the five Scenarios. A brief summary is provided in Section Five.

1.5 In essence, we submit that the choice of housing target must fundamentally be derived from the evidence base, otherwise both it and the Core Strategy which details it, will be found unsound. Public opinion clearly has a legitimate role to play in the process but must be assessed in the light of the technical evidence.

1.6 In this case it is evident that there is a need for an increase in housing provision over and above that proposed in the South East Plan. Unless this is reflected in the strategy existing problems of affordability will worsen with progressively more severe impacts on the economic strength, social vitality and infrastructure of the Borough.

SECTION TWO – GOVERNMENT ADVICE

2.1 Since its election in May 2010, the Coalition Government has signalled significant changes to the planning system. Of particular note has been the intention to remove Regional Strategies along with their associated regionally derived housing

2.2 As a result of legal challenges RSs currently remain part of the statutory development plan and the court has ruled that this is of particular relevance in terms of development plan preparation. In R (Cala Homes South Limited) v Secretary of State for Communities and Local Government (No. 3) the Court of Appeal has ruled that “it would be unlawful for a local planning authority preparing, or a Planning Inspector examining, development plan documents to have regard to the proposal to abolish Regional Strategies.”

2.3 This is of direct relevance to Core Strategies currently in preparation whereby the approved RS (South East Plan 2009) constitutes the statutory development plan as regards housing provision and overall spatial strategy. Guildford Borough is however in the unusual position of having launched a legal challenge against the South East Plan, in particular the need for a Green Belt review to the south of Guildford. We therefore recognise that the Borough Council has more flexibility than other local authorities on this matter.

2.4 PPS12 (Local Development Frameworks) establishes the Government's policy on the preparation of development plan documents and sets out the requirements in respect of Core Strategies. It states that an Inspector examining the soundness of a Core Strategy must establish that it (in this case as regards housing provision) is justified, effective and consistent with national policy:

To be considered as justified the document must be:

- founded on a robust and credible evidence base; and
- * the most appropriate strategy when considered against the reasonable alternatives.

2.5 In other words the local housing target set by the Borough Council must fundamentally have regard to the evidence base. Whilst the results of public consultation are relevant to this, PPS3 (para 33) states that evidence of current and future levels of need and demand should be taken into account, based on:

- Local and sub-regional evidence of need and demand, set out in Strategic Housing Market Assessments and other relevant market information such as long term house prices.
- Advice from the National Housing and Planning Advice Unit (NHPAU)²¹ on the impact of the proposals for affordability in the region.

The Government's latest published household projections and the needs of the regional economy, having regard to economic growth forecasts.

2.6 If public consultation favours scenarios that do not reflect adequately the evidence base formed by these considerations, and the Core Strategy proceeds on that basis, the document will be unsound. That needs to be clearly understood by all those engaged in the

process.

2.7 The recent Written Ministerial Statement: Planning for Growth (23rd March 2011), which forms a material planning consideration, has furthermore outlined the pressing need to ensure that the planning system does everything it can to help secure a swift return to economic growth.

2.8 The Statement outlined the Government's top priority in reforming the planning system is sustainable economic growth and jobs and that the expectation is: "that the answer to development and growth should wherever possible be 'yes', except where this would compromise the key sustainable development principles set out in national planning policy."

2.9 Local Authorities should make every effort to identify and meet the housing, business and other development needs of their areas, and respond positively to wider opportunities for growth.

2.10 The second matter arising from the Ministerial Statement is the intended 'presumption in favour of sustainable development', on which a draft document has been published by the Government since the commencement of the Council's consultation. Relevant to the need for an evidence based approach it states:

- Local planning authorities should plan positively for new development, and approve all individual proposals wherever possible
- Local planning authorities should.....prepare local plans on the basis that objectively assessed development needs should be met, and with sufficient flexibility to respond to rapid shifts in demand or other economic changes.'

SECTION THREE – RESPONSE TO COUNCIL STATEMENTS

3.1 "I think there should be more affordable housing built in the local area to help people that cannot afford market prices for housing (either to buy or to rent)"

3.1.1 We support the above statement. As with most of the South East, Guildford experiences high house prices which results in a commensurately high need for affordable housing in the Borough. The West Surrey Strategic Housing Market Assessment, February 2009 identifies the need as follows:

Summary of housing needs situation in Guildford

Backlog need (annual) 324

Backlog supply (annual) 158

Net backlog need (annual) 166

Future need (annual) 1442

Future supply from existing stock (annual) 414

Net future need (annual) 1028

Total net annual need 1194

3.1.2 To meet the identified need for affordable housing therefore the Borough would need to be completing a total of 1194 units per year across the plan period. The Council's most recent Annual Monitoring Report (2009-2010) identifies that some 50 units (gross) of affordable housing were completed in the reporting year, a mere 4% of the identified annual need.

3.1.3 The Council itself has set a target of achieving 400 new affordable homes in the Borough over the period 2008 and 2012. Based on past completions and projected affordable housing completions the Council's AMR considers that the Council will fail to reach this target, with only 319 units projected to be completed. This issue is likely to have been exacerbated by the issues surrounding the South East Plan and lower housebuilding

activity in the private sector, on which much of the funding for affordable housing depends.

3.1.4 Consequently we consider that the need to provide affordable housing in the Borough is a key consideration for the Council. To address the current shortfall it will be necessary for the Council to plan positively to encourage the provision of affordable housing through both purely affordable developments and the provision of affordable housing as part of larger developments. Imaginative approaches to housing tenure and delivery can assist in increasing the supply overall.

3.2 “I think there has been enough new housing in the local area over the past years”

3.2.1 We do not support the above statement. The South East Plan provided for a total of 8,440 units over the plan period (2006 -2026). Notwithstanding the Council's challenge to the South East Plan the evidence base which informed the strategy in terms of housing provision remains of relevance.

3.2.2 That housing target for the Borough was based on the 2004 Household Projections which identified a need for an additional 8,000 dwellings during the plan period. Since the 2004 household projections were published two further updates have been published. The most recent of these, 2008, identified a need for 9,000 additional homes to 2026. This demonstrates that in demographic terms the housing requirement is now higher than at the time of the South East Plan, not lower.

3.2.3 Moreover, the Council's SHMA identifies a need 644 units per year, creating a total of 12,880 units over the equivalent period. Consequently there can be no doubt that there has been insufficient housing provision and that the future target requires to be greater than the previous plan provision. This consideration is directly relevant in the context of PPS3 para 33 – see para 2.5 above.

3.3 “I think new housing should be built only if it will contribute funds to the new and improved infrastructure and community services required to support additional new homes.”

3.3.1 We recognise the importance of the consideration of the impact of new developments on existing infrastructure and services. PPS3 para 33 identifies this as a legitimate element of the evidence base to be used in testing the scale of housing provision: “An assessment of the impact of development upon existing or planned infrastructure and of any new infrastructure required.”

3.3.2 We consider that the Council's Planning Contributions SPD, March 2011, will help to ensure that appropriate contributions will be made by developments towards the provision of infrastructure and community services.

3.3.3 Furthermore it is considered that the forthcoming Site Allocations DPD will help to address this issue by identifying sites for development which will not have a significant adverse impact on infrastructure and community services, either because of existing spare capacity or because the developments themselves can contribute to overcoming any shortages.

3.4 “I support only a small amount of additional housing in the local area even though it might discourage business investment and might lead to less job formation and higher house prices.”

3.4.1 We reject this statement. As an approach to housing provision it flies in the face not only of the relevant evidence base but also of clear statements of government policy to stimulate economic growth and jobs. The lack of housing implied would also hinder the

provision of affordable housing and exacerbate the existing problems in this regard. Lack of adequate and affordable housing will have a direct impact on the ability of local employers to recruit the workers needed to fuel growth and deter inward investors.

3.5 “I welcome new housing to enable people to find suitable accommodation, to support the local economy.”

3.5.1 We support the above statement, for the reasons set out in para 3.4.1 above.

3.6 “I think that the local area cannot accommodate an increase in jobs and employment areas, so I think people may have to travel to jobs outside of the borough. I realise that this may lead to a higher level of out-commuting and increased traffic congestion.”

3.6.1 We do not support the above statement. Guildford is identified as a Centre for Significant Change in the South East Plan which brings with it an associated expectation for an increase in employment. We consider that it is both necessary and appropriate for the settlement to expand both in relation to housing and employment.

3.6.2 Out-commuting is a frequent phenomenon in the South East as a whole, and self containment is not a realistic outcome to plan for. Nevertheless, consistent with the government’s presumption in favour of sustainable development, the Council must generate strategies to encourage locally based employment wherever possible. This will need careful balancing with the need for new housing and improvements to infrastructure.

3.7 “I think that there should be more jobs provided in the local area and that will help reduce the level of out-commuting and ease traffic congestion.”

3.7.1 As discussed at section 3.6 we consider that the Council should take a balanced approach to the needs for new housing, new employment development and improvements to transport and other infrastructure so as to create an appropriate and sustainable strategy for the future development of the Borough.

3.8 “I would like to see all countryside protected, even if that means not being able to provide much more housing and perhaps constraining the local economy.”

3.8.1 We do not agree with the above statement and consider it to be unduly restrictive. The strategy proposed by the statement would have profound negative impacts on both the employment and housing prospects of the Borough. Whilst we recognise the importance of seeking to protect some areas of countryside this must be balanced against the need for employment and residential development.

3.8.2 Much of the Borough is subject to Green Belt status which restricts the potential for development. Nevertheless national policy (PPG2) provides the basis for a review of detailed green belt boundaries in the development plan process where exceptional circumstances arise. The need for additional land for development would represent such a circumstance and, given the finite supply of previously developed land in this case, will need to be accepted.

3.8.3 Consequently we consider that the desire to protect the countryside needs to be balanced against the needs for employment and residential development.

3.9 “I think our most important countryside land should be protected, but I think some countryside land could be used to provide housing and employment land in the future.”

3.9.1 We generally agree with the above statement. It provides the basis for an approach

which would allow for the balancing of the competing demands of the protection of the countryside against accommodating development needs as discussed at section 3.8.

3.9.2 However clarification is needed as to what is meant by the 'most important countryside land.' There is a variety of environmental and landscape designations affecting land across the Borough. They are of varying significance and policy status. Any responses to this question are of dubious value without this further qualification.

3.10 "I think that this local area can only accommodate a limited number of new homes. I realise that this will not help those people currently living here who are in urgent need of sustainable accommodation, including those who cannot afford homes to rent or buy at market prices."

3.10.1 We do not support statement 10. As highlighted already, the housing target must be evidence based and the evidence base points irrefutably to higher levels of provision than in the past. The Borough plainly has a particular need for affordable housing but this must be balanced with the need for market housing both to meet wider demands and as a principal source of funding for affordable housing provision.

SECTION FOUR – HOUSING SCENARIOS

4.1 The Council identifies the following five housing scenarios for consideration through the current consultation:

- Scenario 1: Level of housing based solely on demographic change
- Scenario 2: Level of housing to meet some future demand
- Scenario 3: Level of housing to meet future demand but would not address the need for affordable homes
- Scenario 4: Level of housing that will meet future demand and address limited need for affordable homes
- Scenario 5: Level of housing that will help address the need for affordable homes

4.2 It is difficult to assess the relative merits of the five scenarios without the identification of the housing targets that the Council considers would result in each case.

4.3 Nevertheless on the strength of the evidence base, and reflecting our responses to the statements in Section Three, we most support scenario 5. The rationale for this has primarily already been set out in Section Three. However for convenience we summarise the key points below

- Affordability is a key issue in the Borough. The West Surrey Strategic Housing Market Assessment, February 2009 identifies an annual need for 1,194 affordable in the Borough. This is equivalent to almost three times the total provision required in the borough under the South East Plan;
- By comparison the Council's most recent Annual Monitoring Report (2009-2010) identifies that some 50 units (gross) of affordable housing were completed in the reporting year, a mere 4% of the identified annual need;
- the Council itself has set a target of achieving 400 new affordable homes in the Borough over the period 2008 to 2012. This target, already substantially below the assessed need, will not be achieved;
- The Council must pursue a strategy which will stimulate additional affordable housing. As a principal funding source for this purpose, the strategy will also need to facilitate an increase

in private market housing;

- Latest estimates of overall housing demand demonstrate that the provision of 422 dpa required under the South East Plan will not be sufficient. This was derived from the 2004 based projections which indicated an increase in households of 8,000 in the Borough over the period. The latest 2008 projections indicate an increase of 9,000 households. Even without allowing for vacancy and reduced sharing this points to a target of 450 dpa over a 20 for vacancy and reduced sharing this points to a target of 450 dpa over a 20 year period;

- The SHMA assesses the requirement to be even greater at 644 units per year, ie. 12,880 units over a 20 year period.

4.4 Notwithstanding inevitable and understandable concerns about the impact of new development, the Council must adopt an evidence based approach which reflects the scale of housing needs and demand. This points to an approach which balances the need for new housing, new employment development and improved infrastructure so as to create a sustainable strategy for the future development of the Borough.

4.5 Without prejudice to the need to protect the environmental assets of the Borough, the Council must also be prepared to review existing policy designations with a view to allowing modest releases of land for development in support of the overall strategy objectives. This will include the Green Belt having regard to national policy in PPG2 which allows for a review of boundaries in these circumstances

SECTION FIVE – SUMMARY

5.1 In essence, we submit that the choice of housing target must fundamentally be derived from the evidence base, otherwise both it and the Core Strategy which details it, will be found unsound. Public opinion clearly has a legitimate role to play in the process but should not usurp clear technical evidence. In this case it is evident that there is a need for an increase in housing provision over and above that proposed in the South East Plan. Unless this is reflected in the strategy existing problems of affordability will worsen with progressively more severe impacts on the economic strength, social vitality and infrastructure of the Borough.

5.2 Thus we support Statements 1, 5 and 9. We are neutral in respect of Statement 7, and we disagree with Statements 2, 3, 4, 6, 8 and 10.

5.3 We support Scenario 5.

We write on behalf of our client CEMEX UK Ltd, to submit representations in relation to the 'Who needs housing?' Core Strategy Regulation 25 Consultation. CEMEX considers that it is useful to highlight the key areas of support or objection that are most relevant to the site identified. Principally, our comments are made in accordance with Planning Policy Statement 12: Local Spatial Planning (2008) (PPS 12) and the 'tests' set out in paragraphs 4.51 - 4.52, for assessing whether a development plan is sound. Specifically, CEMEX wishes to ensure that the emerging policies within a new LDF are the most appropriate in all the circumstances, that they are founded on a robust and credible evidence base and ensure that the plan is reasonably flexible to enable it to deal with changing circumstances and comply with National Planning Policy.

Nationally, CEMEX owns a number of strategic sites, which are either due to, or have already ceased being in operational use. In accordance with National Planning Policy, CEMEX is seeking to promote these sites for alternative uses. CEMEX, Send Within the Guildford Borough Council Core Strategy area, CEMEX owns one site, the extent of which is

shown on the attached site plan. The address of the site is as follows: CEMEX Send Papercourt Lane Send An overview of the potential land use that CEMEX considers would be appropriate for the site is set out below. This provides the basis for our representation to the 'Who needs housing?' Regulation 25 consultation.

Send Site

The CEMEX site at Send is located on Papercourt Lane and is approximately 100 ha in size. It is currently used for agriculture, and contains areas of woodland and waterbodies. Although the site has a Green Belt designation in the Local Plan, we suggest that this designation should be reviewed and removed from this land, as the site is suitable for residential development and could make an important contribution to housing land supply in an area of very high demand and need.

The Strategic Housing Market Assessment (2009) reveals that in Guildford borough, there is a shortfall of around 644 homes per year. Population projections indicate that between 2008 and 2030, the economically active population is set to increase by 4,100 people. The site at Send could help address this housing shortfall and projected population growth by facilitating extensions to the adjacent villages of Send and Burntcommon. It is also ideally positioned between the large settlements of Guildford and Woking.

Scenario 5 Of the five level of housing scenarios proposed in the consultation document, CEMEX supports 'Scenario 5: level of housing that will help address the need for affordable homes'. This scenario would provide the level of housing required to deal with factors such as decreases in household size and would support high employment growth. This scenario would deliver the greatest number of affordable homes, significantly helping to address the need for affordable homes whilst ensuring that this need does not increase over the coming years.

CEMEX's site at Send would be suitable to accommodate a significant level of housing growth, and could provide a comprehensive package of infrastructure and other community benefits.

Summary In conclusion, CEMEX urges the Council to pursue 'Scenario 5: level of housing that will help address the need for affordable homes' because this scenario would provide the level of housing required to deal with factors such as decreases in household size and would support high employment growth. It would also deliver the greatest number of affordable homes.

CEMEX's site at Send would be suitable to help deliver this scenario. Residential development at the site would also address the clear housing shortfall in the borough, exacerbated by the projected population increase between 2008 and 2030. On behalf of CEMEX, we request that we be kept informed of progress with this and future LDF documents, and wish to reserve our client's position to submit further representations on subsequent documents, including the Guildford Borough Council Core Strategy.

2. Background to Housing

2.1 The reference to the position on the South East Plan is misleading. The Council successfully challenged the requirement for an urban extension on the basis that a sustainability appraisal of the reasonable alternatives had not been undertaken. The challenge was successful and, because of that, the overall housing number also fell. However, there was no dispute about the overall need, only the alternatives available to meet that need.

2.2 The South East Plan debate and evidence base remains relevant, and until the regional spatial strategy (RSS) is revoked, the Core Strategy must, by law, be in general conformity with it. This is relevant as Guildford is identified as a regional hub in the South East Plan, where there is pressure for growth and Policy LF1 requires Guildford Borough Council to make provision for urban extensions in order to meet housing needs. At this time, whilst developing the Core Strategy, no account can be taken of the intention to abolish the RSS (this has been established through the Court of Appeal's ruling of 27 May 2011 in the Cala Homes case). The context of PPS 3 also remains relevant, including the principle that everyone should have the opportunity to have a decent home.

2.3 Further, the evidence is such that housing needs remain significant and emerging Government Policy, through the Localism Bill, Plan for Growth and presumption in favour of sustainable development, all support the highest growth levels set out in the options.

2.4 In order to be found sound the Plan, in accordance with PPS3 (Housing) and PPS12, must be informed by a robust shared evidence base, particularly of housing need and demand, through a Strategic Housing Market Assessment (SHMA), and land availability, through a Strategic Housing Land Availability Government's intention to 'free' local authorities from regional targets, as confirmed by the letter to Chief Planning Officers, 6 July 2010. The letter emphasized the need for housing targets to be transparent and fully justified.

3. Key considerations in setting a local housing requirement

3.1 The housing requirement must be locally determined but not locally driven; It should not be artificially constrained by local opposition in respect of the scale of development. It is very clear that the localism agenda is geared towards local decisions in respect of how demand is met, not ways in which to cap or minimise provision.

3.2 Although no figures are given, the evidence set out in the topic paper regarding economic growth, labour demand and supply, housing demand, need, and supply, and related topics, indicates that the housing requirement to 2030 is likely to be significant. As the consultation paper acknowledges, the West Surrey SHMA (2009) identifies that there is already a growing housing supply issue in the borough. At the time of that report, a shortfall of around 644 homes per year was calculated (approximately half of this being housing need i.e. affordable housing) which is driving up the cost of local homes. This shortfall is likely to have worsened in the since publication of the report. Therefore, the urgency to address the housing supply issue is growing.

3.3 When considering options for growth in the borough, proper consideration should also be given to the Government's commitment to increasing housing supply set out in the white paper Local growth: realising every place's potential (October, 2010). The white paper identifies housing an important source of economic growth and emphasises the role of local authorities' responsibility to "ensure a responsive supply of land that supports business growth and increased housing supply" (Box 2.A). A main function of the planning system, the Government states, is to provide sufficient housing to meet demand.

3.4 More recently, the Government's Plan for Growth (March 2011) restates the urgency to increase housing supply. The Government has adopted a progrowth strategy and has announced its intention to introduce a presumption in favour of sustainable development and is in the process of introducing a National Planning Policy Framework, which will require local authorities to positively plan for growth.

3.5 Part of this pro-growth strategy has seen the Government introduce Local Enterprise Partnerships (LEPs). Enterprise M3 has been set up to provide a partnership to direct growth

in the M3 corridor economic area, including the Surrey local authorities.

3.6 In its proposal to Government, the LEP identified one of its key functions would be involvement in strategic planning for and delivery of housing and infrastructure. It also identified several challenges to successful growth that related to the provision of and access to housing in the economic area. A lack of affordable housing, for example, was noted to undermine economic diversity as young people and low skilled workers are unable to remain in the area, disrupting the labour supply for local businesses.

3.7 At the borough level, the Guildford Economic Strategy (2011) identifies the threat of failing to deliver housing to meet demand and the need to increase supply of homes through the LDF. Guildford's Sustainable Community Strategy also recognises the importance of housing supply and the links between a shortage of affordable housing and perpetuating commuting problems as local workers seek cheaper housing outside the borough.

3.8 Identifying the right level of housing growth is therefore important not only for social cohesion and well being, but for unlocking the potential of the local economy leading to more sustainable communities.

4. Scenarios

4.1 Scenario 5 (Level of housing that will help address the need for affordable homes) should be pursued. There would be no benefit or justification in pursuing other scenarios which are based solely on demographic change, or partially meeting demand with limited need for affordable homes, since these will have consequences such as constraining economic growth, pushing up house prices (already very high on average), and failing to properly address local need.

4.2 If the Council pursues a lower growth scenario it is running a significant risk that the Strategy will be found unsound when tested at Examination in Public. Low growth strategies would ignore the housing supply issue identified by the SHMA and fail to plan for growth to help build greater economic prosperity, as required by the LEP and Guildford's own Economic Strategy.

4.3 To conclude, only Scenario 5 can offer the positive pro-growth strategy that would reflect the Government's priorities and respond effectively to the local evidence base.

1. First Wessex generally supports the aims of the authority to make arrangements and for the securing the setting of a local housing requirement for residential development to 2030, in the absence of a housing target in the South East Plan. However, there are serious concerns regarding the early signs on the approach being taken as set out in the Topic Paper (TP) currently on consultation.

2. The TP makes a compelling argument regarding the need for continued economic growth in the Borough and the link between this and housing and sustainable development. It is also clear that the authority is in some difficulties with the current evidence base and that the statutory requirements set out in Planning Policy Statement 3: Housing (PPS3) are not being met.

3. Before assessing the five scenarios for growth set out in the TP, it is worth reiterating some of the key facts regarding housing need, supply and demand set out in the document:

a. It is projected that Guildford Borough will become a net importer of 20,700 employees by 2030, commuting into the area to meet the demand for workers.

b. On average there has been a net migration of people moving into the Borough of 100 people a year between 1992 and 2009.

c. The number of households is projected to increase by around 9000 from 2011 to 2030

4. The document summarises the anticipated effect of this on the Borough, which is worth quoting in full, "All the factors above continue to affect housing demand. As demand grows so do high prices, resulting in more people not being able to afford to buy a home. This can increase the number of people on the housing register in need of affordable family homes, or into lower priced homes outside of the Borough. This in turn increases commuter distances to some of our key services and can cause severe traffic congestions, and limited essential services in bad weather conditions."

5. A number of reports have been undertaken assessing the problems facing the area. There are currently 3,790 households on the Council's housing register (as at 30 September 2010), 2300 of which are in the top three priority bands. The TP states that the remaining 1,490 either do not have a local connection, can afford to buy or rent on the open market, or have not yet provided proof of their housing situation.

6. Notwithstanding the caveats these 1,490 households themselves clearly consider they have an affordability problem. It is also worth noting that the figures refer to households not the numbers of people involved.

7. The TP recognises that, "If sufficient new affordable housing, particularly family housing is not provided, the Council may have to house more families in bed and breakfast or private rented accommodation, which has social and economic consequences."

8. The Strategic Housing Market Assessment, 2009 (SHMA) sets out that there is a shortfall of around 644 homes per annum in Guildford Borough, a significant proportion of which is for affordable homes. The figure also does not take into account the backlog from previous years.

9. The Council's key delivery targets as set out in the Annual Monitoring Report 2009/10 (AMR 09/10) include a target for 400 affordable homes to be built in the Borough between 2008 and 2012. This equates to a figure of 100 new affordable homes per year, which is double what was built last year.

10. The TP states that the data in the SHMA suggests that on an annual basis there will be, "...636 newly forming households requiring affordable homes and a further 806 existing households per year. The total future need for affordable housing is therefore estimated to be 1,442 homes per year."

11. It is noted in this context that the AMR 09/10 has under its list of 'Key Successes' the completion of 50 affordable homes that year.

12. In contrast to the wealth of information on the issues facing the Borough, it is clear that the Council are facing difficulties in meeting the requirements set out in PPS3 with regard to monitoring, future projections, maintaining a five year land supply and assessing the amount of land available for future development. This has a major knock on effect to the ability to respond accurately to consultation on housing.

13. There is not a completed Strategic Housing Land Availability Assessment (SHLAA) to enable assessment of how much land has been put forward for development by landowners in the Borough. It is therefore difficult to assess the development potential within the area and whether there is a need for a Green Belt review for example in order to meet the

demand. The last Housing Potential Study was carried out in 2007.

14. As a consequence, as set out in the AMR 09/10 the Council are unable to prepare a housing trajectory, projecting future housing completions. Whilst the amount of completions between 2000/01 and 2009/10 have averaged 340 dwellings per annum the AMR acknowledges that this figure will not provide an accurate forecast for the future (and because it is averaged out provides a far healthier picture than the current economic reality).

15. The South East Plan has been re-instated and the Government's intention to revoke regional strategies is currently being given limited weight in the decision making process. The Chief Planning Officer's letter of the 6th July 2010 makes it clear that the evidence that informed the preparation of the RSSs may also be a material consideration in assessing applications.

16. The draft South East Plan proposed a figure of 322 dwellings per annum. The Guildford Borough Council response to 'Sub-matter 8Hii Housing and Green Belt (London Fringe)' of the Examination in Public (EIP) states that the Surrey Housing Potential Study, the Guildford Housing Potential Study (2006), and the Guildford Residential Design Guidance SPG, "...demonstrate that the SEP housing requirement can be accommodated without damaging the overall environment or quality of life of urban areas." The Council supported the housing figure of 322 dwellings per annum, in particular because the, "... Surrey Housing Potential Study demonstrated sufficient capacity to meet the SEP requirements without recourse to Green Belt."

17. The adopted South East Plan increased the housing requirement to 422 dwellings per annum in an attempt to tackle the housing problems facing the Borough, through an urban extension at Guildford of 2000 dwellings. The Council successfully challenged this figure on the basis that the "Sustainability Appraisal failed to take into account reasonable alternatives to the release of the Green Belt" and it was subsequently removed.

18. The removal of the higher target was not an endorsement of the lower housing figure, however, nor did it negate the need to consider the requirement for an urban extension or Green Belt review to tackle the ongoing and increasing affordability problem in the Borough.

19. One of the main reasons in the Council EIP response for the concerns regarding the Green Belt was, "The ability to deliver housing development in the Borough is severely constrained by the need to avoid harm to the TBHSPA."

20. However, the Topic Paper identifies that SANG land has been identified to provide for approximately 2,700 new homes within 5km of the Thames Basin Heaths Special Protection Area. Three additional areas of SANG land are currently being negotiated to provide alternative land for an additional 9500 new homes. This means there could be enough SANG land for an additional 12,200 new homes in the Borough in the future. The TBHSPA is therefore no longer a constraint to future development.

21. The five development scenarios proposed do not have figures attached to them and therefore the Council's aspirations are hard to judge. However given the approach to the SE Plan figure of 322dpa; the past completion rate of 340dpa; the fact that the scenarios do not mention the possibility of a Green Belt review or sustainable urban extension; means that 'Scenario 5: Level of housing that will help address the need for affordable homes' will likely seek to follow a reduced figure in the low 300s per annum for new homes to 2030.

22. However, given the severe affordability problems facing the Borough and the Council's indication that this can be accommodated, the figure of 322 dwellings per annum (dpa) is the minimum level of housing that should be provided until 2030. Notwithstanding the above this

is not considered a realistic solution to meet the future needs of the residents. The figure of 322dpa is in line with the average housing delivery over the last 10 years, but this was insufficient to tackle the problem as set out above.

23. It is clear that approaching the delivery of future affordable homes based on the previous housing delivery rate has not and will not deal with the issues facing the Borough currently and which will be exacerbated in the future, along with the associated economic and social consequences.

24. The TP states that, "There is a sixth possible option that would attempt to meet future demand and the full need for affordable housing has not been included due to the very high number of new affordable homes that would need to be built." This is not an explanation as to why the approach has not been considered. Failure to put forward an option of a much higher housing rate, potentially involving Green Belt review for consideration in future development plan documents will be a fundamental flaw in the process, leaving the document open to legal challenge in much the same way as occurred with the South East Plan.

25. Out of the five options put forward Scenario 5 is supported, but only in as much as this will produce the highest housing target. Our client considers the LPA should also put forward a sixth option to provide a more concerted effort to tackle the affordability issues facing the Borough, based on a minimum housing target of 422 dwellings per annum, a comprehensive and robust review of the Green Belt and a sustainable urban extension at Guildford.

We act on behalf of [REDACTED], who is promoting his sites in Effingham and Ripley for 'Sustainable mixed housing developments'. Please find enclosed a completed Response Form to the above Housing Consultation. These sites have already been submitted for consideration under the Guildford SHLAA in 2010 and we look forward to receiving your response to all of these consultations in due course. In order to fit in with Guildford's Local Development Scheme, which indicates further consultation on the Core Strategy during early-mid 2012, we have commenced work on the Master Plan and draft Environmental Statement. We would welcome the opportunity to discuss these proposals with you, should this be appropriate at this point. In any case we look forward to receiving your feedback.

Recommendation - New homes should be planned and designed to meet the needs of disabled people and to reduce the cost of adaptations in the future.

I have consulted with housing colleagues in order to respond to your consultation with specific reference to the needs of disabled people. Our comments have focused on the type of new housing having regard to the likely demand within the area and not on the location or number of new housing units needed.

The most reliable information we have on the needs of disabled people was obtained from a survey of private housing carried out in 2009. Relevant information from this representative sample of properties has been reproduced as an annex.

The demand for adaptations is increasing year by year, a reflection not only of the ageing population but improvements in medical and health care. This is particular noticeable in the medical. The design of new housing should be fit to meet the needs of people with physical disabilities as well as those with sensory impairment.

The design of new build dwellings should reflect the need to provide accessible housing and greater emphasis should be given to the need of wheelchair housing to reflect the proportion of wheelchair users in the general population.

In the annex Table 3.6 sets out the nature of adaptations required by households. Whilst some of these adaptations are specific to individuals some careful planning of new homes would help to eliminate some of the current barriers and eliminate expensive alterations at a later date.

Consideration should be given to determining how new developments can better meet the need of disabled persons. In particular need to address several questions:-

- Should new developments include a quota of accessible housing
- Should a specific standard be applied
- Would the accessibility standard be appropriate to adopt for all new developments.
- Should standards be mandatory

It is recognised that planning control has some limitations in its ability to control standards but any opportunities to influence design will be beneficial.

Properties built to life time homes standards are intended to provide an accessibility standard but there are many examples where even this standard has been met in no more than a token way. There are examples of live time home standards which fail to deliver, e.g.

- There are ground floor showers that have been poorly designed and not fit for purpose.
- Wheelchair housing where the parking is inadequate
- Small rooms which provide inadequate circulation
- Stairs which are turning 90degrees which if straight could reduce the cost of installing a stair lift 3 or 4 fold.

This response to the "Who Needs Housing?" consultation is made for and on behalf of Solum Regeneration by Broadway Malyan. Solum Regeneration is a partnership formed between Network Rail and Kier Property, to bring forward station improvements and regenerate surrounding underused station assets and property, primarily through mixed use development. Solum Regeneration is already bringing forward significant improvements in several other prominent locations in the south-east.

Our client has significant land interests at and around Guildford Station. Recognising that this key strategic site can act as a catalyst for significantly improving the town centre, we have already undertaken our own initial stakeholder and public consultation on this area whilst at the same time engaging in discussions with officers and members of Guildford Borough Council. In addition, we also participated in the Borough's own town centre wide masterplan consultation event on 26th June 2011. We are keen to deliver a proposal which benefits the County town and which will deliver much needed homes and employment.

Turning to residential matters, even although we are at relatively early stages in our approach with exact site mix to be defined as part of a mixed use development, It is evident that not only can the site can deliver residential development but this is an appropriate use.

The site is in a suitable location for housing development, within a town centre. Development at Guildford Station will meet Government objectives of creating mixed and sustainable communities, and ensuring that housing is developed in suitable locations which offer a range of community facilities and with good access to jobs, key services and infrastructure.

National planning guidance PPS4 promotes sustainable economic growth through improving the vitality and viability of town centres as well as by reducing the need to travel. It goes on to explain that one of the ways in which this will be achieved will be through promoting a diverse mix of uses within existing centres.

Land at Guildford Station can provide a mix of uses that will contribute to the long term

vitality and vitality of the Town Centre whilst also reducing the need to travel given its proximity to a major transport hub. Recent Ministerial Statements Planning for Growth and PPS3 emphasise the importance of Local Authorities identifying and meeting the housing, business and other development needs of their areas.

The evidence base supporting this consultation identifies that there is a significant housing need for all types of housing throughout the Borough. We broadly support the need to deliver a high level of homes and recognise that this will help address the needs of a range of residential needs.

We therefore believe that Scenario 5 as referenced in the consultation is most appropriate but wish to stress that this addresses the need for a full range of residential accommodation, from private, to affordable through to students and residential extra care. This would allow for the greatest number of homes and would be in accordance with PPS3 which explains that ". . . everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live." (Paragraph 9). Furthermore, as the site is brownfield land and within the town centre, priority for residential, employment and leisure uses is afforded. We believe that this site could accommodate between 250 and 500 new homes during the plan period.

Residential development around Guildford Station would make important contributions to housing supply over the plan period. The site is capable of achieving a wide mix of housing on site which would include private and affordable housing, the latter contributing to acute affordable housing need within the Borough. The site is also capable and appropriately located to meet more specialist housing needs, including housing for students and extra care residential accommodation.

Development at Guildford Station will be an effective use of land and will make contributions towards targets set for housing to be built on previously developed land. Concentrating on building housing in Guildford and other town centres within the Borough is an important factor given the policy constraints outside of settlement boundaries including Green Belt, AONB and the SPA. The development of the site will also contribute to the efficient use of land and given its Town Centre location and can accommodate comparably high housing densities when compared to the rest of the Borough.

When assessing the level of housing need, the Local Authority need be realistic as to whether sites which are being considered are actually deliverable. Land at Guildford Station is deliverable and is therefore available, suitable and achievable. The site would make effective use of land, existing infrastructure and private investment.

It is crucial that the level of housing prescribed by the Council in their Core Strategy is sufficient in meeting the identified local housing need and which allows for high employment growth within the area. Land at Guildford Station can make significant contributions to housing demand and can provide a range of housing on site.

Solum Regeneration will continue to work with the Council as they prepare the Town Centre Masterplan by promoting the site as major opportunity which can not only contribute towards housing but to the improvement of the town centre as a whole. Further viability and market testing of the site is being undertaken in order to finalise the likely mix of the site. Once there is more certainty we will update the Council so the necessary evidence base documents including the SHLAA can be informed.

We appreciate that this is an initial, broad level of consultation, however as both the Borough's masterplan as well as Core Strategy and Solum Regeneration's more detailed proposals come forward we look forward to continuing our dialogue to deliver a significant

improvement for the town.

Setting a Local Housing Requirement - Response on behalf of Taylor Wimpey Strategic Land (TWSL)

We refer to the above document published in May 2011. It is appreciated that the formal consultation period on Housing Scenarios has ended but the company trusts that in this non-statutory context you will accept, and may be interested in, the views of TWSL.

Firstly TWSL would just wish to say that the Housing Requirement Topic Paper itself is a particularly comprehensive and thorough digest of this complex issue. The economic and sustainability case for housing provision comes through extremely clearly. The issues of inwards and outwards commuting are fairly set out and the economic growth restrictions are apparent if housing supply continues to be stagnant through policy restriction. The information in the topic paper contains on housing need is truly startling.

TWSL notes that all the evidence points to Guildford Borough as having one of the most severe housing crises in the country in the terms of affordability and provision; it has the highest number of households in need in Surrey. The SHMA indicates, without counting backlog, a shortfall of around 644 homes pa with just over half to be for affordable homes, the rest for market properties. Last year just 85 affordable homes were delivered.

It must not be forgotten that the development plans still need to be produced on well founded evidence. The 'Steve Quartermain letter and Q & As' of 6~ July 2010 on behalf of the Secretary of State makes this clear. Local authorities should continue to use and collect reliable information to justify their housing supply policies'. This should be in line with PPS3' .. Strategic Housing Market Assessments are specifically noted as having an important part to play, whilst sufficient sites and broad areas for development are needed to deliver housing ambitions for at least 15 years from a plan's adoption.

TWSL would stress that the Government drive to achieve sufficient housing for people based locally has not diminished; on the contrary. The Parliamentary Statement on Revoking Regional Strategies makes this clear. Councils should support the construction of new homes and will be rewarded for it. The Government is committed to housing growth', and local authorities and communities should increase their aspirations for housing and economic growth'. Indeed the ultimate removal of Regional Strategies is intended to be a catalyst to "encourage the investment, economic growth and housing that Britain needs'.

More recently the pronouncements have got even more emphatic on the need to deliver sufficient levels of housing. The content of Planning for Growth and all that entails has been well-rehearsed. The forthcoming National Planning Policy Framework will call on LPAs to plan positively for new development. It seems highly likely it will require a rolling five year supply of deliverable land for housing along with the need to provide for an additional 20% at least.

The more TWSL consider.; the matter the less there can be any justification for leaning towards a housing supply figure which falls appreciably below demonstrable need. For this reason possible Scenarios 1. 2 and 3 should be firmly ruled out. There needs to be more work based around Scenarios 4 and 5. The level of housing needs to meet future demand and has to help address the need for affordable homes. In the absence of numbers attached to the scenario it is obviously hard for respondents to be precise. However, from what we have seen and read TWSL would support Scenario 5: being a level of housing that will meet future demand and will help address the need for affordable housing.

Setting aside the dire consequences for the families involved, and the economy, a lack of

resolve to fully address the need for new homes in the borough would have obvious knock-on effects in the failures which would arise to achieve sustainable transport, suitable services, vibrant settlement centres and recreational choice TWSL would stress that the Borough must not over-play the SPA, AONB and Green Belt restrictions. Where there is a will there is often a way for development to be satisfactorily accommodated within areas of environmental 'constraints'. Furthermore, and importantly, the Borough must not lose sight of the fact that a Significant swathe of its area towards Ash and Tongham is both highly sustainable and clear of such constraints. Housing development could and should urgently take place in this part of the Borough.

TWSL looks forward to further engagement on this matter. Bearing in mind Taylor Wimpey's standing in the country's largest house builders it would ask please for full involvement in the development plan formulation sessions which lie ahead.

Please find attached the completed questionnaire on behalf of our client, Bewley Homes, in response to Guildford Borough Council's publication of its topic paper 'Setting a Local Housing Requirement'. We also have a number of comments to make in relation to a number of subsections within the topic paper, which are set out below.

1. Economic Growth and Prosperity

We are encouraged to note that Guildford Council recognises the importance of housing supply on economic prosperity and growth and that a good housing supply and mix is likely to support long term economic growth prospects. The importance of economic growth is reiterated in the Government's recently published "Planning for Growth" (23 March 2011), which highlights a strong presumption in favour of sustainable growth and stresses the importance of LPAs to make every effort to identify and meet the housing, business and other development needs of their areas. In the Council's topic paper, a lack of affordable homes and a poor road network were identified as the two factors, from a business point of view, that deter businesses investing in Guildford. Placing economic growth as a priority for the Borough requires the Council to focus on providing the necessary housing to facilitate this and we support that approach.

2. Housing Demand

The Council's Strategic Housing Market Assessment (2009) (SHMA) revealed that there was an overall housing shortage of 644 homes per year and over 50% of these homes are affordable. This figure does not take into account any backlog accrued from years preceding this assessment. As already stated, the lack of affordable housing has actively deterred new business from the Borough.

3. Housing Supply

The Council's 2009/10 AMR identifies that since 2000 there has been an average of 340 homes delivered per year. It is acknowledged in the topic paper that whilst the Council envisages delivering 100 new affordable homes per year, which is woefully short of meeting the estimated need of 1442 homes per year, it is failing to achieve anywhere near that figure, averaging only 77 per year since 2008.

If this current trend of demand continually outstripping supply continues, then land prices and hence house prices will continue to rise and those most in need of housing support will increase.

4. Housing Scenarios

We consider the five housing scenarios/options as set out in topic paper are over simplistic. There is currently a significant under supply of housing and none of the options would address the undersupply issue as well as providing for future need. Without an indication of the housing numbers proposed for each scenario, we consider the scenarios to be meaningless.

5. Environmental Capacity of Land Availability

The majority of land within the Borough is designated as Green Belt, and it is recognized that this is a significant restraining factor on housing land supply and consequently future growth and prosperity. Areas of land, mostly beyond the immediate urban areas of Ash and Tongham, have been given the land designation of "Countryside beyond the Green Belt". The topic paper states that these areas are particularly sensitive to development as they lie adjacent to Green Belt land. However, with housing land at a premium and a general consensus to protect the release of Green Belt land, the use of Countryside Beyond the Green Belt can provide the level of housing needed to help relieve the issue of affordability and achieve its aim of increased economic growth without the loss of Green Belt land.

We look forward to further engagement in the preparation of Guildford's Development Framework. Should any workshops or forums be held in preparation of any Development Plan Document or background evidence documents, Barton Willmore would be keen to become involved.