

# Topic paper: Duty to Cooperate

December 2017

To accompany Guildford borough Submission Local Plan: strategy and sites



GUILDFORD  
BOROUGH

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# Topic Paper: Duty to Cooperate

## 1 Purpose of this topic paper

- 1.1 This topic paper is one in a series, which sets out how we have developed the key strategy within the Guildford borough Submission Local Plan: strategy and sites document. Each topic paper will look at the relevant national and local guidance that informs the Submission Local Plan. Topic papers explain how the strategy has developed, in addition to the information, evidence and feedback that have informed the choices made in formulating the policies.
- 1.2 The intention of the topic papers is to provide background information; they do not contain any policies, proposals or site allocations. Topic papers have been produced to accompany the Submission Local Plan to the Secretary of State for examination.
- 1.3 The main areas covered by this topic paper are:
  - Strategic context
  - Scoping of issues
  - Consultation feedback Strategic cooperation
  - Specific issues

## 2 Policy Context

### National context

- 2.1 Our policies must be positively prepared, justified, effective and consistent with national policy and legislation. The [National Planning Policy Framework](#) (NPPF) sets out the overarching planning policy framework, supported by [Planning Practice Guidance](#).
- 2.2 The duty to cooperate was created in the [Localism Act 2011](#). It places a legal duty on local planning authorities, county councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plan preparation in the context of strategic cross boundary matters.
- 2.3 The prescribed bodies, as set out in the accompanying [Town and Country Planning \(Local Planning\) \(England\) Regulations 2012](#), are:
  - the Environment Agency
  - Historic England
  - Natural England
  - the Mayor of London
  - the Civil Aviation Authority
  - the Homes and Communities Agency
  - Clinical commissioning groups
  - the National Health Service Commissioning Board
  - the Office of Rail Regulation
  - Transport for London
  - Each highway authority (in our case this is Highways England and Surrey County Council), and
  - Marine Management Organisation (in our case not relevant)

- 2.4 The NPPG states that whilst Local Enterprise Partnerships (LEPs) and Local Nature Partnerships are not subject to the requirements of the duty, local planning authorities and the public bodies that are subject to the duty must cooperate with them and have regard to their activities, so long as those activities are relevant to local plan making.
- 2.5 The Localism Act defines a strategic matter as sustainable development or use of land that has, or would have, a significant impact on at least two planning areas, including county council matters.
- 2.6 In particular, the duty should ensure that strategic priorities are properly coordinated and reflected in local plans. The NPPF (paragraph 156) requires that we set out the strategic priorities for our area. These include strategic planning policies to deliver:
- the homes and jobs needed in the area
  - retail, leisure and other commercial development
  - infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat)
  - health, security, community and cultural infrastructure and other local facilities, and
  - climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.
- 2.7 The duty to cooperate should lead to effective policies on strategic cross boundary matters. For this reason, inspectors will assess the outcomes of cooperation and not just whether we have approached others. The duty to cooperate is a legal test which is separate from but related to the Local Plan test of soundness.
- 2.8 At examination, the inspector will consider whether we have complied with the duty to cooperate. The Inspector will recommend that the Local Plan is not adopted if the duty has not been complied with and the examination will not proceed any further.
- 2.9 If the Inspector finds that the duty has been complied with, the examination will also test whether the Local Plan is sound. The test of soundness, set out in the NPPF (paragraph 182), assesses whether the Local Plan is:
- positively prepared;
  - justified;
  - effective; and
  - consistent with national policy.
- 2.10 In assessing whether the Local Plan is effective, the Inspector will assess whether it is deliverable within the timescale set by the Local Plan and if it demonstrates effective joint working to meet cross boundary strategic priorities.

## Neighbourhood Plans

- 2.11 Neighbourhood Planning enables Neighbourhood Forums and Parish Councils to develop a plan setting out a vision and planning policies for their designated neighbourhood area. Those 'Neighbourhood Plans' which are successfully adopted will form part of the statutory development plan for the area that they cover. Where a Neighbourhood Plan is adopted or emerging before an up-to-date Local Plan is in place, the local planning authority should take it into account when preparing Local Plan policies.

- 2.12 There is currently one adopted Neighbourhood Plan (Burpham), one emerging, post-examination Neighbourhood Plan (Effingham), and one progressing towards examination (East Horsley) within the borough. Six other Parish Councils are also currently producing Neighbourhood Plans.
- 2.13 Given neighbourhood plans should only cover non-strategic policies, we do not consider that there should be potential conflicts between any adopted/emerging neighbourhood plans and the policy approach in the Submission Local Plan: strategy and sites.
- 2.14 The weight given to an emerging plan will depend on, among other things, the extent to which there are unresolved objections to the plan (NPPF paragraph 216). Therefore, an emerging neighbourhood plan will pick up weight once evidence of consultation is published and the level of unresolved objection is known. At time of writing, the Effingham Neighbourhood Plan has been through examination, which has resolved any remaining objections, and is progressing towards a referendum. The East Horsley neighbourhood plan is progressing towards examination and is accorded very little weight at this stage.
- 2.15 Details are available at [www.guildford.gov.uk/neighbourhoodplanninginformation](http://www.guildford.gov.uk/neighbourhoodplanninginformation).

### 3 Evidence base

- 3.1 The NPPF requires us to develop policies based on up to date evidence. Our evidence base comprises documents that have helped inform past and current stages of our Local Plan policy development and emerging evidence that will help inform future development of policies for the Local Plan. Where appropriate, we have worked on these jointly or collaboratively with neighbouring councils or prescribed bodies.
- 3.2 Further information and copies of the evidence base documents are available on the Councils website at: [www.guildford.gov.uk/newlocalplan/evidencebase](http://www.guildford.gov.uk/newlocalplan/evidencebase).

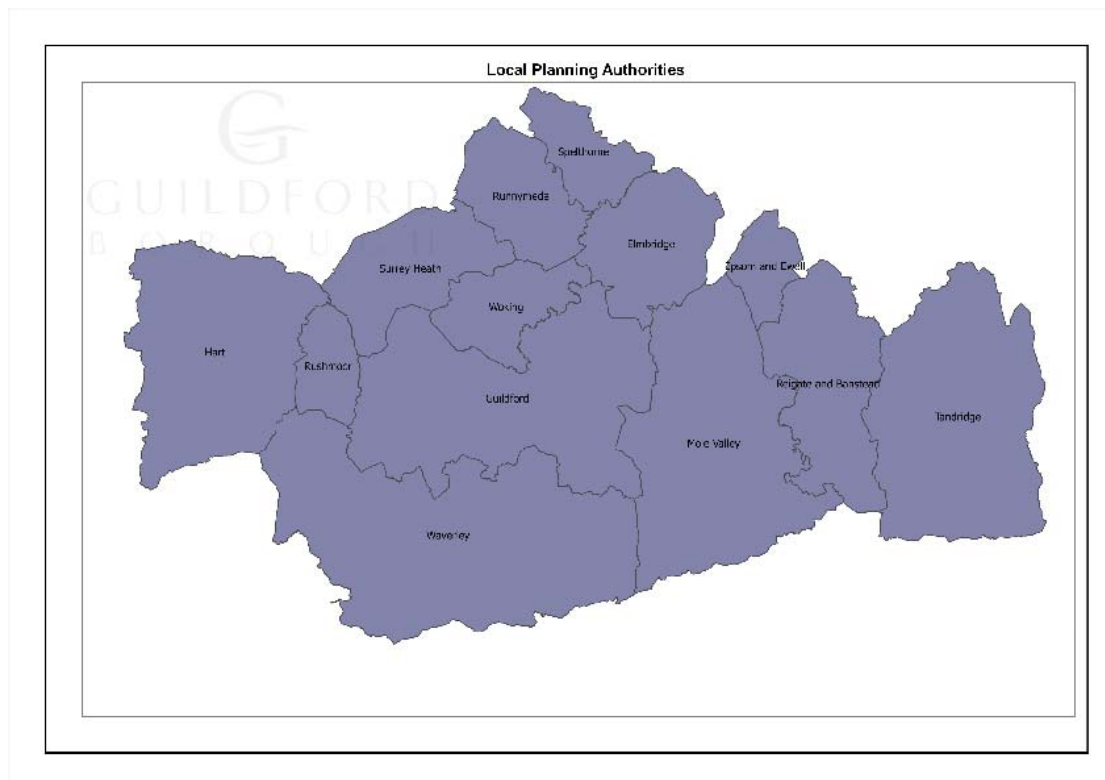
### 4 Appraisal

- 4.1 The following section brings together relevant legislation and key evidence base findings where appropriate. It highlights the main areas relevant to our approach to fulfilling our duty to cooperate.

#### **Strategic context**

- 4.2 Guildford is the county town of Surrey, known for its historical buildings, landscapes, cultural associations and the picturesque town centre. Situated in the south west of the county, on the border with Hampshire, the borough is surrounded principally by Green Belt, with countryside to the west. Figure 1 illustrates Guildford borough's position in relation to surrounding authorities. The urban areas of Guildford, and Ash and Tongham are home to many of the borough's residents, with further communities in village settlements. In total, we have approximately 145,500 residents. We are within commuting distance from London and about 70 kilometres from the south coast. We also have an important sub-regional role as a regional administrative and commercial centre and Guildford town is Surrey County's premier town centre destination.

- 4.3 We have a number of environmental constraints across the borough, including the Thames Basin Heaths Special Protection Area (SPA) to the north and the Surrey Hills Area of Outstanding Natural Beauty (AONB) to the south.
- 4.4 Guildford is a busy town with a wide influence on its surrounding area. The M25, A3, A31 and A331 are the principal routes that connect Guildford to the rest of the Strategic Road Network. The A3 trunk road cuts through the borough and provides a direct link to London and the south coast.
- 4.5 The borough benefits from twelve rail stations, including Guildford railway station, the busiest in the county, which provides access to, and interchange between, four lines. These rail lines fan out to serve our other stations and destinations beyond including London Waterloo, Woking, Reading, Redhill and Gatwick Airport.



**Figure 1:** Map of Guildford borough and surrounding boroughs and districts

## Scoping of issues

- 4.6 A scoping exercise was undertaken in early 2013, which included a Duty to Cooperate workshop, to fully understand the strategic issues, with whom we shared them and whether there were any existing mechanisms already in place that would enable us to fulfil our legal duty. A targeted consultation exercise was carried out with our neighbouring authorities and the relevant prescribed bodies to ensure that we adequately captured all the issues correctly. This ensured that we could cooperate on them from an early stage.
- 4.7 Through the scoping exercise we were able to identify and agree the following strategic cross boundary issues.
- Housing
  - Traveller accommodation
  - Employment
  - Retail



- Infrastructure
- Transport
- Green Belt
- Surrey Hills Area of Outstanding Natural Beauty (AONB)
- Green and Blue Infrastructure
- Thames Basin Heaths Special Protection Area (SPA) / Suitable Alternative Natural Greenspace (SANG)
- Flood risk / waterways
- Education
- Health
- Services and utilities (including minerals and waste)

4.8 Included in Appendix 1 is a matrix indicating the organisations with whom we have common issues. This has formed the basis for both formal consultations particularly when agreeing Duty to Cooperate Scoping Statements and when responding to other plans. It has also formed the framework for understanding who we need to work with in order to secure effective outcomes. Depending on the issue, some cooperation has taken place as part of formal and regular working groups whilst the majority have required a more targeted and issue-specific approach. Whilst this matrix forms a useful starting point, it focuses primarily on the bodies with whom we share the strongest linkages. Cooperation may be required to be undertaken on an even wider basis depending on the specific issue and the circumstances at that time.

## **Consultation feedback**

- 4.9 We have carried out formal consultation with all the neighbouring authorities and prescribed bodies as part of our statutory consultation processes as we have developed our Submission Local Plan. This consultation was carried out in accordance with our Community Involvement in Planning<sup>1</sup> document.
- 4.10 As part of developing the Local Plan we have consulted at the following main stages:
- Issues and options (October 2013) – which identified a range of issues and potential options for how we should plan for Guildford borough
  - Draft Local Plan (July 2014) – which outlined our preferred approach for planning for Guildford borough
  - Proposed Submission Local Plan (June 2016) – which included the policies and sites that we had intended to submit for examination
  - Regulation 19 Proposed Submission Local Plan (June 2017) – a targeted consultation on proposed changes to policies and sites
- 4.11 Comments received as part of the consultation stages have been taken into account in the preparation of the Local Plan. The main issues raised in all four consultations, together with our response, is set out in the accompanying Consultation Statement.

## **Strategic cooperation**

### Surrey Strategic Planning and Infrastructure Partnership

- 4.12 Whilst the councils that we need to cooperate with will differ according to the strategic issue, and may in some instances extend beyond the county boundary, cooperation between Surrey County Council and Surrey districts is important for dealing with infrastructure issues such as transport and education. For this reason, a framework has been put in place for the county area of Surrey although

<sup>1</sup> Available online at: [www.guildford.gov.uk/ces](http://www.guildford.gov.uk/ces)

acknowledging that this in itself cannot satisfy the requirements of the duty. The Surrey Strategic Planning and Infrastructure Partnership will however make a significant contribution to helping discharge the duty by developing a Local Strategic Statement (LSS) which will set out our objectives on strategic matters. It will help to align strategic spatial, infrastructure and economic priorities which can then be reflected in the Local Plans of individual planning authorities. It would also facilitate a co-ordinated approach to engaging with London and its growth impacts on Surrey, and help strengthen the case for further investment in Surrey.

- 4.13 In July 2014 the Surrey Leaders considered a Memorandum of Understanding (Appendix 2) and Terms of Reference (Appendix 3) prepared by the Heads of Planning (Surrey Planning Officers Association - SPOA) and Chief Executives across Surrey. It was agreed in principle for Surrey County Council and each borough/district to adopt. Our Executive approved signing up to the Memorandum of Understanding for the Surrey Strategic Planning and Infrastructure Partnership to work towards the production of a Local Strategic Statement (LSS) for Surrey in November 2014.
- 4.14 We are continuing to cooperate in the preparation of the LSS, having become part of the steering group that leads on the drafting and coordinating of the LSS. The LSS is proposed to be prepared in two stages. The first stage has resulted in the preparation of a draft interim LSS 2016 - 2031. The draft interim LSS has been prepared through a bottom up approach drawing together what is in existing and emerging Local Plans to give an overview of shared challenges, strategic objectives and the spatial priorities/key locations for growth. It enables Surrey authorities collectively to articulate their growth ambitions and spatial priorities for the short to medium term and to engage on strategic issues as they progress Local Plans and as part of sub-regional and regional discussions.
- 4.15 The following strategic objectives were identified and are intended to guide Local Plans in delivering the overall vision for the county.
- Objective 1: Supporting Economic Prosperity - Local authorities will work with partner organisations including the LEPs, business support organisations, the business community and education and training providers to help support a strong, competitive economy.
  - Objective 2: Meeting Housing Needs - Local planning authorities will work together and with infrastructure providers to deliver planned growth and seek to meet as far as possible objectively assessed needs and specific housing needs.
  - Objective 3: Delivering Infrastructure - Local authorities will work together with public and private sector partners to ensure sufficient capacity is available or can be delivered to support growth and meet the needs of new development.
  - Objective 4: Supporting environmental sustainability, natural resource management and conserving and enhancing the character and quality of the countryside and Green Belt - Local planning authorities will work together and with partners to invest in natural capital, avoid adverse effects on the environment and improve resilience to climate change to support economic prosperity and the wellbeing of residents.
- 4.16 The draft interim LSS considers four sub-areas to allow an additional level of detail to be provided on how the LSS challenges present themselves in different parts of the county. The majority of our borough falls within the A3 corridor sub-area, along with parts of Waverley and Woking. The western edge forms part of the Blackwater Valley sub-area along with parts of Waverley and Surrey Heath.

- 4.17 The draft interim LSS was presented to Surrey Leaders in April 2017 and approved for a targeted consultation with a range of neighbouring councils and prescribed bodies. This targeted consultation was undertaken in August – September 2017. The consultation responses were broadly supportive, including the response from the GLA. These comments will inform the final draft of the LSS which is expected to be endorsed by Surrey Leaders in early 2018. Once the final LSS is approved by the Partnership, consideration will be given as to whether to progress the second stage. This was originally envisaged as an additional piece of work to assess potential housing provision across Surrey, based on land supply evidence from existing Local Plan work and consider to what extent any housing shortfall might be addressed taking into account wider land use demands, particularly employment land and the ‘balance’ of housing and employment provision and environmental constraints. Bringing together all the evidence would then provide the basis for facilitated discussions with Leaders to enable them collectively to drive the development of a shared and evidenced position on the broad priorities for development in Surrey.
- 4.18 The Partnership also proposes to prepare an Investment Framework to support the delivery of the strategic priorities in the LSS including a co-ordinated approach to infrastructure funding and delivery that builds on the Surrey Infrastructure Study. The first Surrey Infrastructure Study was published in 2016 and is currently being updated. This will include information consistent with the proposals in the Submission Local Plan. The final document is expected to be endorsed by Surrey Leaders in early 2018.

#### Strategic Spatial Planning Liaison Group (SSPOLG)

- 4.19 The Mayor of London is one of the prescribed bodies. We have cooperated with the Mayor through the Greater London Authority (GLA). In October 2012, the Mayor of London explored options for future cross-boundary work on strategic planning for London and the Wider South East. During 2013, he also held two well-attended officer workshops with representatives from planning authorities across the Wider South East to discuss relevant strategic planning issues. Subsequently, a working group of officers was established to explore strategic planning issues and examine the mechanisms for ongoing coordination and cooperation. The Strategic Spatial Planning Officer Liaison Group (SSPOLG) was formed and has focused mainly on housing, infrastructure and demography. Surrey, and Guildford borough, has been represented on this group by two officers including the Spatial Planning and Policy Manager from Surrey County Council.
- 4.20 SSPOLG has also been supporting the member level round table discussions and Summits that have taken place since early 2015. As part of this cooperation, the Leaders of local authorities within the wider South East and the LEPs discussed the best way forward and shaped the priority areas of work. There has also been discussion on the preferred political arrangements for issues to be raised and addressed.
- 4.21 As a result of these discussions, a formal Political Steering Group has been set up to initiate, steer and agree strategic collaboration activities across the wider South East. The Group meets 2 - 3 times per year and includes five political representatives from the East of England, South East and London. The Surrey County Council Deputy Leader is a member of this group and is therefore representing Surrey, and Guildford borough, interests. In addition to this, there is an Officer Working Group (OWG), that is the successor to SSPOLG, which meets regularly to support the Political Steering Group. There are two Surrey representatives (currently represented by an officer from Surrey County Council and Spelthorne Borough Council) and we will continue to input into this process through them.

- 4.22 A Wider South East Summit was held on 9 December 2016 to which both Surrey County Council Deputy Leader and officer representative attended. This was the first opportunity to feed into and influence the GLA before work begins on preparing the draft consultation for the New London Plan. A further Wider South East Summit, to which all Leaders/Portfolio Holders will be invited to, was scheduled for November 2017 but has now been rearranged for January 2018. The reason for doing so is to ensure it coincides with the Mayor's consultation on the London Plan. The OWG are holding an additional meeting in December 2017 in order to prepare for this.

#### Enterprise M3 LEP

- 4.23 We sit within the Enterprise M3 LEP which runs across parts of both Hampshire and Surrey. It published its Strategic Economic Plan (SEP) in March 2014 setting out growth locations, transport investment, and bringing forward delivery of housing and infrastructure. The LSS would further build on the SEP by putting it into a spatial planning context. The SEP identifies Guildford as one of four growth towns which are key to driving economic growth across the Enterprise M3 area. It also seeks to support the Enterprise M3 economy, namely the 'Sci:Tech Corridor'.
- 4.24 As part of preparing the new Local Plan, we have had regard to the SEP and are seeking to meet both our identified housing and employment needs. In particular, we are also seeking to build on our existing strengths with a focus on research, development and design activities and the provision of valuable knowledge-based employment. This is demonstrated through the allocation at Blackwell Farm for an extension to the Surrey Research Park and Policy E4 which specifies the type of knowledge-based, high-value businesses we wish to see develop here. This will help to build upon the investment already secured by the University of Surrey who, working in partnership with the LEP, have secured £60m of funding for the 5G Innovation Centre.
- 4.25 Work is currently underway to build upon and update the current SEP to reflect the changing economic and policy environment and to guide future strategic priorities for investment in the area. The first phase of work includes a review of recent documents, programmes and national policy to produce an evidence base. This will inform their understanding of the nature of the EM3 economy, and the priorities for a revised SEP. There has also been some stakeholder consultation.
- 4.26 To further support and help build on LEP identified opportunities, the Submission Local Plan proposes to inset Send Business Centre/Tannery Studios, Send from the Green Belt and designate it as a Strategic Employment Site. This gives it additional protection and places it higher up the hierarchy in terms of sequentially preferable locations for the location of new employment floorspace. This site has received significant LEP funding to secure necessary digital infrastructure to support additional jobs (discussed further in the Employment Topic Paper). The proposals in the plan enable further expansion opportunities on the site to build upon the investment already put in place.
- 4.27 Additionally there are numerous other projects funded by Enterprise M3 through the Local Growth Fund relevant to Guildford borough. Completed and current projects include providing an improved sustainable transport route through Guildford along the towpath and collaborating with University of Surrey to support the development of an Innovation Hub at the Pirbright Institute. Forthcoming projects include developing a package of transport infrastructure and sustainable transport schemes within Guildford. This is a strategic programme which will collectively create accessibility and infrastructure improvements, unlock development opportunities, increase

housing supply and improve the capacity of Guildford to generate wealth and high quality jobs. Other projects include providing a package of improvements around the railway station and town centre, and providing new housing within the Slyfield Area Regeneration Project (SARP).

- 4.28 SARP is a major redevelopment of the Slyfield area of Guildford which has been designated as a Housing Zone. The project has been in the pipeline for the last ten years but has not previously reached the development stage due to development constraints caused by land contamination. The scheme follows on from the Clay Lane Link Road, funded by the LEP, which is an essential prerequisite to enable the whole site to be unlocked. The project will directly address land remediation costs, unlocking the site for future residential and commercial development and enabling Slyfield to become a viable proposition for private sector investment. The project also includes the relocation of the ageing sewage treatment works to the 1970s land fill site, relocation of the Guildford Operational Services Depot to the old landfill site, and the Surrey Council Waste Transfer Station, as well as the building of two new industrial units.
- 4.29 We are also members of various groups such as Surrey Future and Surrey Leaders. All twelve Surrey local authorities, the two LEPs, the University of Surrey and representatives of the business community have collectively agreed that the five top transport infrastructure priorities for the county of Surrey are the improvement of the A3 trunk road, a county-wide major schemes programme, improvements to the North Downs Line, the realisation of the regional option for the Crossrail 2 scheme, and the improvement of surface access journeys to Heathrow and Gatwick airports. These county-level priorities are aimed at supporting economic growth in Surrey, the south east and beyond.
- 4.30 In January 2017, the Department for Communities and Local Government confirmed the award of £71.1m to EM3 LEP as the third allocation of Growth Deal funding which now totals £219.1m. This allocation has the potential to create and safeguard more than 15,000 jobs and deliver over 6,000 additional homes. Planned investment in transport will ease congestion, with specific regard to Guildford borough (as set out above), while businesses in some of the LEP area will benefit from investments in digital connectivity. The latest Growth Deal allocation will also fund investments in Further Education colleges to help the local workforce develop the skills they need to succeed in today's economy. We will continue to ensure that we engage proactively with the LEP to help facilitate the achievement of common strategic objectives.

## **Specific issues**

- 4.31 We have undertaken considerable joint working with our partners and below we discuss each strategic issue in turn in order to demonstrate how the Submission Local Plan has been informed through cooperation that has been constructive, active and undertaken on an ongoing basis. We are in the process of agreeing Statement of Common Grounds with key prescribed bodies. These will be made available to the Inspector to support our Submission Local Plan at the examination. A summary of the cooperation with each prescribed body together with the key outcomes is set out in Appendix 4.
- 4.32 Whilst the summary pulls together the key outcomes that have been achieved which, taken together, ensure the plan is sound, we consider meaningful cooperation with prescribed bodies and other key stakeholders is essential in ensuring that the plan produced is not only sound but is as good as it can be. Taken together, the Regulation 19 consultation comments (2016 and 2017) set out the latest formal position of each organisation in relation to the Submission Local Plan and

accompanying evidence base. They also help to illustrate some of the changes, major and minor, that have been made to the plan in response to comments received.

4.33 These comments have been set out in the appendices together with our response to each comment made. This helps to demonstrate the extent of the positive cooperation that has occurred to achieve effective outcomes and a sound plan.

These have been split as follows:

- Regulation 19 comments from prescribed bodies (Appendix 5)
- Regulation 19 comments from neighbouring councils, including county councils (Appendix 6)
- Regulation 19 comments from other key organisations (Appendix 7)

4.34 In addition to effective outcomes, the legal duty to cooperate requires that cooperation is active and undertaken on an ongoing basis. It should not be restricted to the formal consultation process and should instead be an integral and iterative part of the plan making process. Appendix 8 includes a log of the ongoing cooperation that has been undertaken over the course of plan preparation in relation to each of the strategic issues.

## **Housing**

4.35 The provision of sufficient housing is of particular importance as part of complying with the duty to cooperate both in terms of both the legal and soundness test. The NPPG is clear that the assessment of need is the first stage in developing one's spatial strategy. It states (Reference ID: 3-045-20141006) that:

*'Local authorities should prepare a Strategic Housing Market Assessment to assess their full housing needs. However, assessing need is just the first stage in developing a Local Plan. Once need has been assessed, the local planning authority should prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period, and in so doing take account of any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need.'*

### *Assessing needs*

4.36 In relation to the NPPF requirement that we have a clear understanding of housing needs in our area, it states (in paragraph 159) that councils should *'prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries.'*

4.37 Early in our plan preparation process (mid-2013) we undertook a scoping exercise to understand whether any of our neighbours would wish to be involved in the preparation of a joint SHMA. We contacted the authorities within our existing housing market area (HMA) from the West Surrey SHMA (2009) and all neighbouring authorities to this. All those contacted had either already commissioned the preparation of a new SHMA or were not currently in a position to update their SHMA, however all wished to be kept up to date and involved in agreeing the methodology. Within our existing HMA, Waverley had already commissioned a new SHMA following the preliminary views of their inspector at their Core Strategy examination in 2013 and Woking had recently adopted their Core Strategy in 2012 and were therefore not planning to update their SHMA.

- 4.38 Waverley had already commissioned consultants GL Hearn to prepare their Waverley SHMA. Whilst we were not in a position to be able to commission this jointly, we were actively involved in the stakeholder sessions undertaken by Waverley as part of this process to agree the methodology and HMA. Analysis undertaken by GL Hearn identified that the existing HMA was still appropriate and the three authorities of Guildford, Waverley and Woking shared the strongest linkages. We submitted a joint response with Woking agreeing to the identification that collectively we form an HMA and reaffirmed our commitment to future joint working on this matter.
- 4.39 As a result of the feedback we received to the scoping exercise, we prepared a Guildford Strategic Housing Market Assessment (SHMA), published in draft form in January 2014. It was also prepared by GL Hearn which helped to ensure the methodology was consistent with that of Waverley's. We undertook a four-week engagement exercise on this draft. This included a series of stakeholder workshops, including with neighbouring councils and the Enterprise M3 LEP. This process informed the final draft Guildford SHMA published in May 2014. This identified our housing market area and the Guildford objectively assessed housing need (OAN). Whilst not fully consistent with the NPPF in relation to covering the entire housing market area (HMA), it nevertheless reassessed the HMA from a Guildford position and provided us with our OAN in order to begin to inform the assessment of potential spatial strategies and site options.
- 4.40 Given the NPPF requirement for SHMAs to cover the whole HMA, we together with Waverley and Woking borough councils signed a Memorandum of Understanding (MoU) (Appendix 9). This includes an agreement to prepare an up-to-date joint SHMA together with a commitment to review whether this needed updating every three years. This would ensure that regardless of what stage any authority is at in their plan-making process, an up-to-date SHMA would readily be available.
- 4.41 The MoU also included a commitment to regular meetings, including where appropriate, at councillor level. Whilst primarily concerned with the SHMA, it did also include the commitment to continuing to work jointly on other relevant cross boundary matters, for example infrastructure.
- 4.42 A joint West Surrey SHMA was published in December 2014 in draft, with the final West Surrey SHMA published in October 2015. We have used our SHMA as the basis for responses to neighbouring authorities on housing need related consultations. This includes those neighbouring authorities where we share relatively strong linkages outside of our core HMA. We have also sought to ensure that the methodology used in surrounding SHMAs is consistent with our own. In particular, we have provided comments to the Kingston and NE Surrey SHMA, the Spelthorne and Runnymede SHMA and attended a workshop on the Surrey Heath, Rushmoor and Hart SHMA.
- 4.43 The final joint West Surrey SHMA (October 2015) identified the full OAN (2013 – 2033) to be:
- Guildford: 693 homes per annum
  - Waverley: 519 homes per annum
  - Woking: 517 homes per annum
  - **Total for the HMA: 1,729 homes per annum**
- 4.44 Subsequent to the publication of the West Surrey SHMA, we prepared a Guildford Addendum in 2017. The West Surrey SHMA: Guildford Addendum Report (2017)

provides a update to the West Surrey SHMA (2015). The Addendum sits alongside and supplements the West Surrey SHMA. It takes account of the latest population and household projections, the latest post-Brexit economic projections and the latest 2015 mid-year population estimate. This informed the updated Regulation 19 Local Plan (2017), and ensured that the emerging plan was based on the most up-to-date evidence. This update reduced the Objectively Assessed Need (OAN) for Guildford from 693 homes per year (2013 – 2033) to 654 homes per year (2015 – 2034). The base-date for the OAN (and start of the plan period) is the 2015 mid-year population estimates. The end of the plan period is set at a date that would give us a 15 year time period from date of adoption (as recommended by para 157 of the NPPF). This therefore runs to 2034. Over the revised plan period, this therefore equates to a reduction of approximately 1,400 homes.

4.45 Also subsequent to the publication of the West Surrey SHMA (2015), Waverley Borough Council submitted their Local Plan Part 1: Strategic Policies and Sites to the Secretary of State for examination. As part of the examination process into the plan, the inspector's initial view was that Waverley's OAN should be increased. This is in response to a consideration of the latest population/household projections, a greater uplift for affordability factors and London migration, and to meet half of Woking's unmet need.

4.46 In order to bring these various strands of evidence together, a 'Review of Housing Needs Evidence across West Surrey HMA' has been prepared. This report sits alongside the West Surrey SHMA: Guildford Addendum and was commissioned in the context set out in Paragraph 2a-007 of Planning Practice Guidance on Housing and Economic Development Needs Assessments, which outlines the following:

*"Local planning authorities should assess their development needs working with the other local authorities in the relevant housing market area ... in line with the duty to cooperate. This is because such needs are rarely constrained precisely by local authority administrative boundaries.*

*Where Local Plans are at different stages of production, local planning authorities can build on the existing evidence base of partner local authorities in their housing market area but should co-ordinate future housing reviews so that they take place at the same time."*

*Meeting needs*

4.47 The NPPF requires that we prepare local plans that seek to meet objectively assessed needs, including unmet needs from neighbouring authorities, where it is reasonable to do so and consistent with achieving sustainable development (paragraph 182). There is currently unmet need arising within our HMA from Woking Borough Council. It has an adopted housing requirement of 292 dwellings (2010 – 2027) against an OAN of 517. There is therefore a shortfall of 225 homes per year between 2013 and 2027, a total of 3,150 homes.

4.48 Waverley Borough Council submitted their Local Plan Part 1 in December 2016. This sought to meet their OAN, as identified in the West Surrey SHMA (2015). The Waverley inspector's initial view was that Waverley should increase their target in order to meet 50% of Woking's unmet need. Waverley consulted on a number of main modifications required to make the plan sound in September/October 2017. This included a revised housing target that seeks to provide for the updated OAN (as set out above) including 50% of the unmet need arising from Woking.



- 4.49 As a result, 50% of Woking's unmet need remains which equates to 1,575 homes to 2026/27. We have sought to assess whether we are able to sustainably accommodate the OAN for Guildford borough together with any unmet needs from the HMA. The Housing Delivery Topic Paper discusses in more detail our approach to meeting needs. This demonstrates that whilst there are significant constraints within our borough, which in accordance with the NPPF can be applied where appropriate to justify not meeting needs, we have sought to maximise sustainable opportunities to meet needs.
- 4.50 As set out in the Housing Delivery Topic Paper, we have applied our spatial hierarchy to direct growth to the most sustainable locations. It is important to note that whilst we have sought to maximise development opportunities higher up the hierarchy, there will be a point within each option when the harm associated with providing additional development would significantly and demonstrably outweigh the benefits of providing more homes within this type of location. This can be due to the impact that it might have on character or the ability of the supporting infrastructure to cope with additional growth. At this point, it is considered to be more sustainable to move to the next spatial option down the hierarchy and once again assess the contribution that it could make to meeting our development needs before the harm once again outweighs the benefits.
- 4.51 The OAN for Guildford over the plan period is  $654 \times 19 \text{ years} = 12,426$  homes (2015-2034). The total potential provision of new homes across the plan period (including completions since 2015 and outstanding capacity) within the Submission Local Plan is 14,191. This provides 1,765 homes as a buffer (14%).
- 4.52 Whilst our spatial strategy does therefore potentially deliver an overprovision in supply compared to our OAN, we consider this is required in order to ensure early provision, flexibility and deliverability of our housing target. Whilst every effort has been made to maximise sustainable sites that are able to deliver in the first five years, there remains a significant shortfall when taking account of the deficit accrued since 2015 and the 20% buffer brought forward from later in the plan period. The reasons for this include the current Green Belt constraint within our borough which has, and will continue to, exacerbate the under-delivery against OAN until such time as the new plan is adopted and Green Belt boundaries are amended.
- 4.53 It also provides a robust supply of housing sites to ensure that the housing requirement is met reflecting the uncertainties related to the delivery of certain key infrastructure that is considered necessary to ensure the planned growth is sustainable. In particular, a number of our strategic sites are dependent upon the delivery of Highways England's A3 Guildford scheme. Due to the completion of the scheme only being expected by 2027, a proportion of the supply is assumed to be built after this date.
- 4.54 For these reasons, the Submission Local Plan proposes a phased target which is lower in the early years and increases thereafter in line with the expected delivery of infrastructure and strategic sites. It is important however to note that in spite of this, the expected delivery of homes year on year as set out in the Housing Trajectory is expected to actually exceed 654 in all but the first year of the plan post-adoption. The phased target therefore serves to help reduce the significant backlog accrued by the point of adoption. More detail on this and the rolling five year housing land supply is contained within the Housing delivery Topic Paper.
- 4.55 The buffer therefore cannot be considered to be contributing towards meeting unmet needs within the housing market area. Instead, it is necessary to achieve delivery of the OAN for Guildford borough. We consider that without it there is a real risk that our

plan would be found unsound, particularly in relation to whether it has been positively prepared and is effective. However should these homes be delivered as currently envisaged then they would of course serve to meet needs although not within the period of time that the unmet need arising from Woking has been identified.

- 4.56 As set out in the Housing Delivery Topic Paper, we have however assessed whether any of the sites removed from the Regulation 19 Local Plan (2016) in the Regulation 19 Local Plan (2017) could be used to contribute towards unmet needs. Of the 2,000 homes lost, 1,400 homes have been removed for good planning reasons, or a change in circumstances or evidence. The further 600 homes removed from the plan are as a result of a more realistic phasing assumption on two strategic sites, with some delivery expected post plan period. Even though we have not sought to artificially constrain the delivery on these two sites should the market and infrastructure allow them to be delivered quicker than we have estimated, this is still likely to occur after the period within which there is an identified unmet need.
- 4.57 Furthermore, we have also assessed whether any other sites identified in our Green Belt and Countryside Study (GBCS) could be brought forward to contribute towards either our own early delivery or unmet needs within the HMA. For the reasons set out in the Housing Delivery Topic Paper, we consider that there are constraints, and that the harm associated with bringing them forward would significantly and demonstrably outweigh the benefits.
- 4.58 Our proposed spatial strategy has been informed by the Sustainability Appraisal (SA), in which we are required to assess all reasonable alternative spatial strategy options. The SA includes eight spatial strategy options ranging from growth options that seek to meet OAN, consistent with the strategy in the Submission Local Plan, up to options that attempt to meet approximately half of Woking's unmet need. This is consistent with the SA testing undertaken for Waverley's emerging plan and the modified housing target based on their inspector's initial view.
- 4.59 The SA concludes that there is no clear best performing or most sustainable option. Instead, there are trade-offs between competing objectives which need to be considered as part of the local plan process when determining our preferred spatial strategy.
- 4.60 Pursuant to the MoU, the three authorities have also agreed a Statement of Common Ground on housing delivery (Appendix 10). Within this all three local planning authorities acknowledge the need to work together to ensure that as far as possible, and subject to policies in the NPPF, housing needs across the HMA as a whole are met. To this end, each authority is committed to continue to work together in future, to address housing needs arising within the HMA:
- Waverley's contribution to meeting Woking's unmet need is expected to be in line with the Inspector's initial findings and has therefore been established in relation to the currently identified unmet need to 2027.
  - Guildford has submitted a plan that meets its own OAN and will seek to demonstrate at Examination that it cannot meet any of the remaining unmet need within the HMA before 2027.
- 4.61 The Inspectors' recommendations and conclusions reached in terms of both the Waverley and Guildford Plans will determine the level of unmet need that remains within the HMA. This will need to be recalculated at the point in time Woking undertake a review of their Core Strategy and is likely to be in the context of the new OAN methodology and the housing provision set out in the adopted plans for Guildford and Waverley. It will be for the Woking Plan to demonstrate the extent to

which it can or cannot meet its own OAN and any outstanding unmet need remaining within the HMA.

- 4.62 As set out previously, we do not consider that we can sustainably accommodate any unmet need arising from Woking. Instead, we recognise that this will require ongoing cooperation. However, in the meantime we consider it essential that we get a new Local Plan in place in a timely manner that can deliver the sustainable development that Guildford borough needs. The level of growth identified within the Submission Local Plan represents a considerable step change in delivery compared to previous rates and will ensure that, in accordance with the NPPF, we are seeking to ‘boost significantly the supply of housing’. It will also introduce some certainty and enable the delivery of sustainable development that is accompanied by supporting infrastructure through the implementation of the Community Infrastructure Levy. We are however committed to continuing to explore with Waverley and Woking those areas which are most likely to lead to positive outcomes.

#### *Land Availability Assessment*

- 4.63 The NPPG states that the Land Availability Assessment (LAA), which identifies a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period, should cover the housing market area. Given the amount of sites being considered and the fact that respective plans can only allocate sites within that borough, we do not consider it practical to prepare a joint LAA. In addition to this, the three authorities have been at different plan making stages and it has been necessary to publish respective LAAs to inform the different consultation stages. It has therefore been neither prudent nor practical to delay publication at various stages in order to align the LAA process. The LAA will however be updated on a regular basis and for that reason we consider it reasonable that, once there is greater certainty in relation to proposed sites across the whole HMA, that we publish a summary table in respective LAAs. The LAA (2016) and LAA Addendum (2107) have both been superseded by the LAA (2017) which supports the Submission Local Plan.
- 4.64 The other key element that we wish to jointly consider is expected delivery across the HMA. In Guildford, the delivery of former Wisley airfield, Gosden Hill Farm and Blackwell Farm is dependent upon the delivery and timing of key infrastructure requirements, or otherwise alternative interventions which provide comparable mitigation. This is reflected in the expected phasing of the sites, with a higher annual housing target anticipated post 2026/27 when we expect the A3 Guildford scheme, as mandated in the Road Investment Strategy, will be complete. This has resulted in a managed trajectory, as discussed above, which begins lower and increases in line with the planned improvements and the lead in time that large sites will naturally have. In order to understand the impact that this will have on the rate of supply across the HMA, we remain committed to the preparation of a joint trajectory. We will prepare this as part of an LAA update once there is greater certainty from the other authorities in relation to expected supply. This will enable us to understand whether, across the HMA as a whole, the supply of homes is being delivered at a more consistent level. This will give a truer reflection of the extent to which the planned delivery of homes is matching the needs identified across the HMA.
- 4.65 In the meantime, we are also continuing to cooperate to ensure that whilst development opportunities across the HMA are maximised, that these are sustainable and any cross boundary impacts are appropriately mitigated. In particular, this relates to the impact that sites in one borough may have on infrastructure in another borough. Further evidence of cooperation on this matter is discussed below, particularly in relation to transport and education.

- 4.66 In addition to general market housing, the NPPF requires that we should plan for the needs of different groups in the community, including the elderly. The SHMA identifies a need for specialist homes that are capable of being adapted to suit needs as well as C2 residential care or nursing home bedspaces. We met Surrey County Council and Waverley Borough Council representatives in 2015 to gain an overview of accommodation with care and support, and talk about the early findings of the SHMA. More recent SHMA findings have also been sent for comment to contacts at Surrey County Council (SCC) for Extra Care, Dementia, Residential and Nursing care. We have also worked with Surrey County Council officers to understand the types of later life accommodation needed as well as the tenure and broad locations of the projected need. Informal comments on the proposed site allocations have been sought prior to publication of the Proposed Submission Local Plan. The SHMA Guildford Addendum 2017 has updated the figures and it projects the need for 433 bedspaces in care or nursing homes over the plan period. The increase in bedspaces required reflects the expected growth in population over 75 years old.

## **Travellers**

### *Assessing needs*

- 4.67 In 2012, the Surrey boroughs and districts agreed a joint methodology for undertaking Traveller Accommodation Assessments (TAA). Following this, we jointly commissioned traveller accommodation survey work with Woking Borough Council, however the results of this were interpreted and presented separately within the Guildford TAA (2012).
- 4.68 We recently completed a new TAA (June 2017)<sup>2</sup>. Before starting this work, we met with officers from Waverley and Woking to see if there was any interest in jointly undertaking TAA work, but neither authority was in a position to progress at that stage. Council officers were also involved in a Surrey officer's working group in 2015 to discuss the issue of a new methodology but decided not to undertake further work at that stage in the absence of anticipated Government guidance on traveller accommodation needs assessments.
- 4.69 As part of Guildford's TAA process we consulted with neighbouring authorities (Elmbridge, Epsom and Ewell, Mole Valley, Reigate and Banstead, Runnymede, Rushmoor, Spelthorne, Surrey Heath, Tandridge, Waverley and Woking). We invited comments on the draft questionnaire and the draft TAA. We also asked specific questions to understand the extent of cross boundary issues and timescales for assessing both needs and identifying supply, and the TAA 2017 includes a summary of responses. Feedback received was incorporated into the final questionnaire used for interviews with travellers and the final TAA. Full details are available in the TAA Consultation Statement 2017.
- 4.70 The responses highlighted that the main cross-boundary issues are considered to be transit sites to meet the needs of the wider area, consistency when assessing Travellers accommodation needs and to share any information which could impact on another assessment.
- 4.71 Whilst traveller accommodation is a cross boundary issue, we consider this relates more so in relation to ensuring there is consistency in how travellers' needs are assessed and any potential impact arising from sites located close to borough boundaries. To date, there has been a consistency in approach to assessing

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<sup>2</sup> Available online at: <http://www.guildford.gov.uk/newlocalplan/taa>

travellers accommodation needs and we have shared information with neighbouring authorities. Our TAA did not identify any clear evidence for the need for transit sites but we will keep this under review.

- 4.72 We will continue to work closely with adjacent councils in relation to any cross boundary sites. An example of where effective co-working has already taken place is at Ash Bridge Caravan Site where an extension of five pitches was built. Alongside officers from Rushmoor Council, we visited the site together to undertake interviews with residents.
- 4.73 In terms of providing sites, we consider that every attempt should be made by each respective council to meet the identified local need. Whilst we fully appreciate the difficulty in identifying suitable and deliverable traveller sites, we have not relied solely on the call for sites process to identify possible options for meeting our own need. Instead, we have corporately proactively explored all opportunities for meeting the need identified in our TAA. This includes making permanent some of our temporary permissions (including inseting from the Green Belt where appropriate), extending existing public sites, requiring our larger site allocations to bring forward an element of traveller provision, and considering the use of our own land to provide sites. Development is almost complete on 6 rural exception pitches at Home Farm, Effingham on Council owned land.
- 4.74 Given the high need that exists within the wider area, we would expect that all councils seek to maximise opportunities to meet their own need, and be able to robustly justify any shortfall in provision. This has been our position during any duty to cooperate discussions with neighbouring authorities.
- 4.75 We continue to work closely with adjacent councils and respond to requests for information from neighbouring authorities as they undertake their TAA's.

#### *Meeting needs*

- 4.76 In terms of any potential unmet need arising within our HMA, there is an agreement that each authority will meet the Gypsy, Traveller and Travelling Showpeople needs within their own administrative area. This is set out in the Appendix 11: Areas of Common Ground, which has been agreed with Waverley and Woking borough councils.

### **Employment**

#### *Assessing needs*

- 4.77 The NPPG requires that we work with the other local authorities in the relevant Functional Economic Market Area (FEMA) to assess development needs. Consistent with our HMA, we are part of the West Surrey FEMA along with Woking and Waverley boroughs. During February and March 2016, we consulted all local authorities which border the three boroughs, plus the County Council, and Enterprise M3 LEP on the definition and methodology of the West Surrey FEMA.
- 4.78 The comments received have informed the final document. The most significant responses related to the then emerging 2016 update of the Enterprise M3 Commercial Property Market Study by Regeneris suggesting that Guildford/Waverley and Woking now operate as separate commercial property market areas. In the 2013 report, they were in the same market area.

- 4.79 However the final draft makes clear that whilst commercial property market areas are one factor to consider when defining a FEMA, there are others notably HMAs. We consider that it is still appropriate to define the West Surrey FEMA.
- 4.80 Whilst we have agreed the extent of the FEMA with our neighbours, we have continued to assess needs separately through the preparation of our Employment Land Needs Assessment (ELNA). The ELNA (2016) was prepared by consultants AECOM who prepared an updated ELNA (2017) to support the Regulation 19 Local Plan (2017). In addition to identifying the level of employment land we need to provide, it also assesses three sources of data for the likely increase in jobs forecast to occur over the plan period (2015 - 2034). In accordance with the NPPG, we need to align our housing and economic strategies to ensure we plan for sustainable patterns of development. For this reason, the West Surrey SHMA: Guildford Addendum considers whether economic growth could result in a need for additional housing. The ELNA (2017) utilised post-Brexit economic forecasts. These resulted in a lower level of economic growth than previously assessed in the ELNA (2016). Analysis in the West Surrey SHMA: Guildford Addendum identifies that the level of housing growth required to support the forecast number of jobs is almost identical to the demographic baseline. For this reason, there is no longer a significant uplift for economic factors in Guildford's OAN.

#### *Meeting needs*

- 4.81 In terms of any potential unmet need arising within our FEMA, there is an agreement that each authority will meet the employment needs within their own administrative area. This is set out in the Appendix 11: Areas of Common Ground, which has been agreed with Waverley and Woking borough councils.

#### **Retail**

- 4.82 The Retail and Leisure Needs Study Update 2014 assesses retail and leisure spending patterns over Guildford borough's catchment area. This catchment consists of eight zones, which span part or all of the following neighbouring councils: Chichester, East Hampshire, Elmbridge, Hart, Horsham, Mole Valley, Runnymede, Rushmoor, Surrey Heath, Waverley and Woking.
- 4.83 The catchment area forms the basis for the updated household telephone interview survey regarding retail and leisure spending habits and provides an overview of the study area's customer profile characteristics. This identifies that within the catchment area there is some expenditure leakage to centres outside of the borough. The main competing centres outside the borough consist of Woking, Godalming, Horsham, Kingston-upon-Thames and Aldershot.
- 4.84 The Retail and Leisure study Addendum (2017) updates the forecast retail and leisure need for Guildford using the latest projections. As we are planning only to meet our objectively assessed retail needs assuming a constant market share (i.e. not attempting to draw proportionally more trade from other centres), there ought to be no significant harmful impact on competing centres. A small amount of convenience need has been identified, and almost all of the comparison need is planned to be located on one town centre brownfield site, North Street, which would be subject to an impact assessment, A retail impact assessment would be needed as part of any planning application, once more certainty of the details of a proposed development scheme for the site are available

## Transport

- 4.85 As the local planning authority, we are required by the NPPF to work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development (paragraph 31). We are also required to set out strategic policies to deliver transport infrastructure in our new Local Plan (paragraph 156). The NPPG states (Reference ID: 12-018-20140306) that:

*“Early discussion with infrastructure and service providers is particularly important to help understand their investment plans and critical dependencies. The local planning authority should also involve the Local Enterprise Partnership at an early stage in considering the strategic issues facing their area, including the prospects for investment in infrastructure.*

*The Local Plan should make clear, for at least the first 5 years, what infrastructure is required, who is going to fund and provide it, and how it relates to the anticipated rate and phasing of development. This may help in reviewing the plan and in development management decisions. For the later stages of the plan period less detail may be provided as the position regarding the provision of infrastructure is likely to be less certain. ...*

*Where the deliverability of critical infrastructure is uncertain then the plan should address the consequences of this, including possible contingency arrangements and alternative strategies. The detail concerning planned infrastructure provision can be set out in a supporting document such as an infrastructure delivery programme that can be updated regularly. However the key infrastructure requirements on which delivery of the plan depends should be contained in the Local Plan itself.”*

- 4.86 Figure 2 is a simplified representation of the transport planning workstream in the Local Plan-making process. Joint working and cooperation has informed each and every stage of this process, as described below. Within our Planning Policy Team, we have a Principal Transport Planner who is responsible for coordinating and managing cooperation on transport planning matters with the relevant authorities and transport infrastructure and service providers.

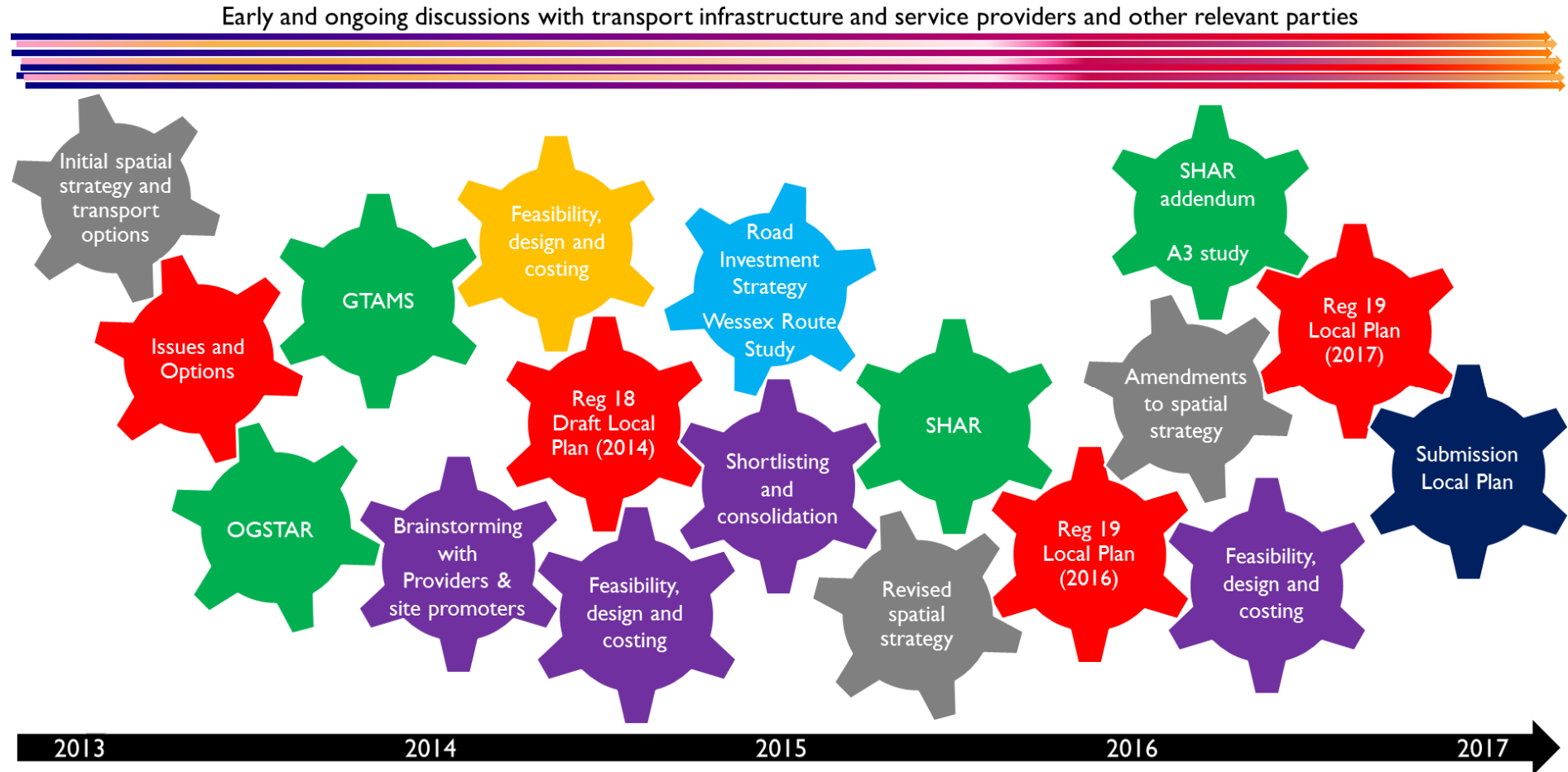
*Early and ongoing discussion with transport infrastructure and service providers and other relevant parties*

- 4.87 We have worked with the following transport infrastructure and service providers across the Local Plan-making period from 2012:
- Surrey County Council – as Local Highway Authority is responsible for maintenance and improvement of adopted local roads, including footways, which collectively comprise the Local Road Network (LRN), the management and improvement of the Rights of Way network, as Local Transport Authority is responsible for transport policy and initiatives through the Surrey Transport Plan, which is the county’s third Local Transport Plan (LTP3), and is a statutory consultee on planning matters and negotiates improvements to the LRN to mitigate the impacts of development.
  - Highways England – as Strategic Highways Company is the Highway Authority responsible for the A3 trunk road and M25 motorway within the borough as part of the nationwide Strategic Road Network (SRN).
  - Network Rail – as the owner and operator of the railway infrastructure in the borough and beyond.
  - The train operating companies (the franchise operators) South Western Railway and Great Western Railway, and previously the former franchise

- operator South West Trains – responsible for operating the principal rail services and managing the rail stations in the borough.
- Bus and community transport operators, principally Stagecoach, Arriva and Safeguard – provide bus services across the borough and beyond.



**Figure 2: Simplified representation of transport planning workstream in the Local Plan-making process**



**Key**

- Spatial strategy and transport strategy optioneering
- Key strategic highway assessments and studies
- Key stages of scheme identification and rationalisation
- Inputs from key national/regional transport strategies/plans
- Formal stages of public consultation

- 4.88 Supplementing other meetings and working with neighbouring borough and district councils, we have specifically met to discuss transport matters with Waverley Borough Council, Woking Borough Council, Rushmoor Borough Council and Mole Valley District Council.
- 4.89 We have also worked closely with the Enterprise M3 LEP, meeting in various forums and specifically to discuss transport matters.
- 4.90 Our most frequent interactions have been with the two highway authorities responsible for roads within the borough, Surrey County Council and Highways Agency/Highways England, meeting them both individually and together throughout the process. For instance, at the start of this Local Plan-making process, we met both highways authorities in October 2012 to discuss both the emerging findings from the first strategic highway assessment study of spatial strategy options and also potential mitigation.
- 4.91 To advance cooperation, the Council has initiated and organised a number of regular working groups which consider transport matters, as follows:
- We convened a regular Transport for Guildford Partnership meeting for several years until May 2013, which included representatives of both Surrey County Council and the Highways Agency.
  - Representatives of both Surrey County Council and the Highways Agency sat on the Steering Group for the Council's Guildford Town and Approaches Movement Study (GTAMS) in 2013/14.
  - Regular meetings of the Guildford Joint Infrastructure Group (JIG) were established in November 2014, involving representatives of the Council, Surrey County Council and Highways Agency/Highways England, and have continued to the present. Since November 2016, the Enterprise M3 LEP, Network Rail, Waverley Borough Council and Woking Borough Council have also attended the Guildford JIG. The expansion of the group responded to a request from Highways England in 2016 to incorporate within the Guildford JIG the scope of its then regular 'A3 Strategic Group' stakeholder meeting. This former stakeholder meeting had involved Highways England engaging collectively with relevant authorities and transport providers to discuss its progress in developing the A3 Guildford scheme, as mandated by the Government's Road Investment Strategy: for the 2015/16 – 2019/20 Road Period (Department for Transport, March 2015), and also targeted improvement schemes.
  - Regular meetings of the Guildford-Surrey Board were established in 2013. This group brings together lead councillors and senior officers from Guildford Borough Council and Surrey County Council, the Enterprise M3 LEP, and other relevant public service agencies to progress shared strategic priorities, including with respect to transport matters. This group has considered matters including the Guildford Borough Transport Strategy, the improvement of the A3 trunk road and various transport schemes supported by the LEP.
- 4.92 The Council has also actively engaged with a number of externally-organised working groups and third party transport projects, including:
- Since 2012, we have represented the seven borough and district councils in the west of Surrey, which fall within the Enterprise M3 LEP area on the LEP's Transport Action Group. Surrey County Council, Highways Agency/Highways England, Network Rail, South West Trains and Stagecoach are represented on this group.
  - We were represented on a stakeholder group for Surrey County Council's Surrey Rail Strategy.
  - We have also attended stakeholder events convened by Highways England, Network Rail, South West Trains, Great Western Railway and South Western Railway.

- 4.93 The following sub-sections provide more detail on the working arrangements and interactions with the transport infrastructure and service providers and other relevant parties.

*Spatial strategy and transport strategy optioneering*

- 4.94 The Council's spatial development strategy addresses the development needs of the borough and where that development should be focused, actively managing patterns of growth to make the fullest possible use of public transport, walking and cycling, and focusing significant development in locations which are or can be made sustainable. The promotion of sustainable transport has been a key consideration in setting the spatial development strategy.
- 4.95 In producing a new Local Plan for its area, Guildford Borough Council as the local planning authority is required to allocate sites for development (NPPF, paragraph 157) and to assess the quality and capacity of infrastructure for transport and its ability to meet forecasts (NPPF, paragraph 162).
- 4.96 Across the Local Plan-making period, and in particular in 2014–2016, the Council, working with the transport infrastructure and service providers and other relevant parties, identified the potential transport schemes on which it was considered the delivery of the emerging draft Local Plan depends, including to mitigate the principal transport impacts of proposed planned growth.
- 4.97 It is important to recognise that the Submission Local Plan's spatial strategy and key infrastructure schemes, as included in the Infrastructure Schedule at Appendix C, have been planned together and are interdependent in various ways. In short, the spatial strategy as proposed is dependent on the key infrastructure schemes as proposed.
- 4.98 We consider that the transport schemes included in the Infrastructure Schedule, as well as the requirements with respect to transport schemes in site policies, are deliverable and based on effective joint working on cross boundary strategic priorities.

*Key strategic highway assessments and studies*

- 4.99 Working with Surrey County Council's Transport Studies Team, we have undertaken a series of strategic highway assessments:
- Guildford Borough Preliminary Growth Scenarios Transport Assessment Report (Surrey County Council, 2013)
  - Guildford Borough Council Local Plan: Options Growth Scenarios Transport Assessment Report (Surrey County Council, 2014) (hereafter OGSTAR 2014)
  - Guildford Borough Proposed Submission Local Plan "June 2016": Strategic Highway Assessment Report (Surrey County Council, 2016) (hereafter SHAR 2016)
- 4.100 The 2013 and 2014 studies assessed the traffic impacts of potential Local Plan growth scenarios and identified 'hotspots' on LRN and SRN which would be adversely impacted, in the absence of mitigation.
- 4.101 The 2016 study, the SHAR 2016, is a technical report on the strategic highway assessment of the spatial strategy in the Regulation 19 Local Plan (2016). This followed and built on the earlier assessments, but was different in that, firstly, it

assessed the growth scenario that represents the spatial strategy in the Regulation 19 Local Plan (2016), and secondly, it assessed the mitigation provided by key highway schemes from the programme of transport schemes that were considered necessary for the delivery of the Regulation 19 Local Plan (2016).

- 4.102 In its representation of 18 July 2016 on the Regulation 19 Local Plan (2016), Highways England raised concerns, including that the SHAR 2016 was deficient.
- 4.103 Following a meeting in September 2016 to discuss these concerns, including exploring the approach that had been taken in the Regulation 19 Local Plan (2016) and its evidence base, Highways England withdrew its representations and supplanted these with new advice and commentary (see Highways England letter dated 5 October 2016). In relation to the SHAR 2016, Highways England (5 October 2016: p.2) stated that:
- “As a result of clarification provided by Guildford Borough Council and Surrey County Council and the conditional requirements of delivery for key sites, Highways England’s concerns regarding the Strategic Highways Assessment are not a matter of soundness, therefore we formally withdraw the representation. Work is ongoing between Surrey County Council and Highways England to resolve any outstanding issues around modelling. This will continue up to the beginning of any subsequent hearing and beyond with outcomes likely being used to inform update to the Infrastructure Delivery Plan supporting the Local Plan.”*
- 4.104 Further evidence has been published as part of the evidence base accompanying the Submission Local Plan. This takes the form of the Study of performance of A3 trunk road interchange in Guildford urban area to 2024 under development scenarios, the earliest date for the start of construction of the A3 Guildford scheme. This study assesses the impacts of mainline queuing resulting from blocking back of traffic exiting at diverge junctions in the peak periods, the operation of merging and diverging at junctions in the peak periods, and the impact on peak spreading. This responds to the issues raised by Highways England in 2016 on the SHAR 2016.
- 4.105 It is relevant to note that Guildford Borough Council has not considered it practicable to utilise Highways England’s Paramics microsimulation model of the A3 Guildford for the Local Plan-making process. This is because Highways England has not allowed direct access to this model to either the Council or Surrey County Council. The Highways Agency initiated development work on the model at least from 2013. The model is presently being used by Highways England to develop the A3 Guildford scheme as mandated by the Road Investment Strategy: for the 2015/16 – 2019/20 Road Period (Department for Transport, March 2015) (scheme SRN2 in the Submission Local Plan). It is also being used by Highways England to develop the targeted improvement schemes for the Guildford section of the A3 (schemes SRN7 and SRN8).
- 4.106 The Regulation 19 Local Plan (2017) contained significant changes from the Regulation 19 Local Plan (2016). This included changes to both proposed site allocations forming the spatial strategy and to the programme of transport schemes. Accordingly, Guildford Borough Council prepared an addendum to the SHAR 2016; the ‘Addendum to Guildford Borough Proposed Submission Local Plan “June 2016” Strategic Highway Assessment Report: High level review of potential traffic impacts of key changes in the Guildford borough Proposed Submission Local Plan: strategy and sites’ (Guildford Borough Council, June 2017c). This high-level review considered the potential changes to traffic impacts – from those reported in the SHAR 2016 – which are expected as a result of the key changes made to the

proposed site allocations and to the programme of transport schemes as identified in the Regulation 19 Local Plan (2017). As the overall quantum of planned development of homes, office and research and development floorspace, industrial employment land, and comparison retail floorspace was reduced from the Regulation 19 Local Plan (2016) to the Regulation 19 Local Plan (2017), the overall number of new vehicle trips resulting from the planned development of these land uses was expected to be lower than previously forecast in the SHAR 2016. Surrey County Council agreed Guildford Borough Council's approach to preparing an addendum to the SHAR 2016 and its Transport Studies Team reviewed a draft of the addendum. Highways England were apprised of the approach and advised that 'as policies are not significantly changing [in the Regulation 19 Local Plan (2017)], there is unlikely to be a need to update substantially the SHA [SHAR 2016].' (Email dated 8 March 2017).

- 4.107 The Guildford Town and Approaches Movement Study (Arup, March 2015) (hereafter GTAMS) was also a key strategic study that has informed the Local Plan-making process. The aim of the study was to develop a recommended long-term movement strategy to 2050 for the town of Guildford. The Council and its consultant Arup also worked closely with both Surrey County Council and the then Highways Agency. The then chairman of the Guildford Local Committee, a Surrey County Councillor, and senior officers from both Surrey County Council and the then Highways Agency sat on the study's Steering Group. Surrey County Council officers also facilitated the use of the SINTRAM strategic highway model by Arup.

*Key stages of scheme identification and rationalisation, including inputs from key national/regional transport strategies/plans*

- 4.108 As stated earlier, across the Local Plan-making period from 2012, and in particular in 2014–2016, the Council, working with the transport infrastructure and service providers and other relevant parties, identified the potential transport schemes on which it was considered the delivery of the emerging draft Local Plan depends, including to mitigate the principal transport impacts of proposed planned growth.
- 4.109 Potential schemes were identified from sources including:
- Meetings and workshops with Surrey County Council to identify the highway schemes which could increase highway capacity and improve road safety at the 'hotspots' identified in the OGSTAR 2014 strategic highway assessment study, and potential rail, bus and active mode schemes which could provide mitigation.
  - Meetings with Highways Agency/Highways England to discuss potential highway schemes on or affecting the SRN including complementary schemes on the LRN, and potential rail, bus and active mode schemes which could provide mitigation.
  - Surrey Transport Plan strategies and other components (Surrey County Council, various dates from 2011 onwards)
  - Recommended strategy from the Surrey Rail Strategy Report (Arup, September 2013), including improvement schemes for the North Downs Line, the confirmation of the business case for new rail stations at Park Barn and Merrow, and the identification of further capacity upgrades on the South West Main Line.
  - Recommended strategy from the Surrey Future Congestion Programme 2014 (Surrey County Council et al., 2014) including schemes for Guildford Gyratory Improvements, Guildford A3 Strategic Corridor Improvements, and Guildford Hub Transport Improvements.

- Recommended strategy from the Guildford Town and Approaches Movement Study (Arup, March 2015 and earlier version), including the Sustainable Movement Corridor, and new rail stations at Park Barn and Merrow.
- Schemes in the draft Guildford Borough Transport Strategy and Implementation programme (Surrey CC, January 2014) and later Guildford Borough Draft Local Transport Strategy & Forward Programme – Part A (Surrey County Council, November 2014)
- The Enterprise M3 Strategic Economic Plan – 2014-2020 (Enterprise M3 Local Enterprise Partnership, March 2014)
- Wessex Route Study (Network Rail, August 2015) and earlier draft for consultation dated November 2014, supplemented by discussions with Network Rail, including schemes for Guildford platform capacity, Portsmouth Direct Line improvements, and electrification of the North Downs Line.
- Road Investment Strategy: for the 2015/16 - 2019/20 Road Period (Department for Transport, March 2015) and an earlier version dated December 2014.
- Surrey Infrastructure Study (Aecom, January 2016)

4.110 Identified potential schemes were assessed and prioritised including through discussions in workshops and meetings, and in studies, including in GTAMS and also a bespoke assessment of options for new A3 slips roads using a demand scenario from OGSTAR 2014.

4.111 The assessment of deliverability for each scheme included consideration of its necessity, fit with policy and requirements, and ability to secure financing and funding.

4.112 It is important to note that schemes identified and promoted in key national/regional transport strategies/plans are key to the Local Plan-making process, and the deliverability of the Local Plan, specifically:

- SRN schemes in and impacting Guildford borough identified in the Road Investment Strategy: for the 2015/16-2019/20 Road Period (Department for Transport, March 2015), which are referenced in the Submission Local Plan as:
  - SRN2 'A3 Guildford (A320 Stoke interchange junction to A31 Hog's Back junction) 'Road Investment Strategy' scheme (E31)'
  - SRN3 'M25 Junction 10/A3 Wisley interchange 'Road Investment Strategy' scheme (E16)'
  - SRN5 'M25 Junctions 10-16 'Road Investment Strategy' scheme (E15)'.
- Rail schemes in and impacting Guildford borough in the Wessex Route Study (Network Rail, August 2015), which inform the following schemes referenced in the Submission Local Plan as:
  - NR1 'Guildford rail station capacity and interchange improvements'
  - NR4 'Electrification of North Downs Line, facilitating increased service frequency'
  - NR5 'Portsmouth Direct Line improvements (together with South West Main Line Peak Demand improvements'.

4.113 The participation of the transport infrastructure and service providers, the Enterprise M3 LEP and neighbouring authorities in the Local Plan-making process, has, in turn, helped to inform their forward plans. In particular:

- The inclusion of the A3 Guildford scheme and M25 Junction 10/A3 Wisley interchange schemes in the Road Investment Strategy: for the 2015/16 – 2019/20 Road Period (Department for Transport, March 2015).

- The M25 to Solent Route Strategy (Highways England, March 2017: p.22) recognises the north facing junctions to the A3 proposed at the A247 Burnt Common interchange (schemes referenced SRN9 and SRN10), noting that *‘Opportunities have also been identified to the north of Guildford for... the introduction of north-facing slips at the A3/A247 at Ripley to support local plan aspirations and relieve some pressure on local roads accessing the A3 at Guildford.’*
- The Wessex Route Study (Network Rail, August 2015) proposes a ‘Guildford platform capacity’ scheme and notes that new stations at Merrrow and Park Barn were proposed by respoondees to the consultation on its draft.

4.114 We have followed up Highways England, Network Rail and the Department for Transport in respect of the national/regional schemes that they are charged with developing, or commissioning in the case of the Department. With respect to the ‘Guildford platform capacity’ scheme, in agreement with Network Rail, we made an allocation in site Policy A8 ‘Land west of Guildford railway station, Guildford Park Road, Guildford’, in the Regulation 19 Local Plan (2017), as follows: *‘This site is allocated for a ‘Guildford platform capacity’ scheme involving additional platforms and layout changes at Guildford railway station as proposed in the Wessex Route Study.’*

4.115 We have also met with both Highways England and Network Rail to discuss the schemes that would be delivered on their networks through the realisation of the Submission Local Plan, and wholly or principally funded by developers or funders. Specifically:

- We have met with Network Rail to progress the investigation of the two new railway stations proposed in the Submission Local Plan.
- We have also met with Network Rail, Surrey County Council and the promoter of the Gosden Hill Farm site to discuss the feasibility and timescales for the construction of the Guildford East (Merrow) railway station.
- For the Regulation 19 Local Plan (2017), in agreement with Network Rail, we proposed the addition of an allocation for the new rail station at Guildford West (Park Barn). This is site Policy A59 ‘New rail station at Guildford West (Park Barn)’, and is located adjacent to the Royal Surrey County Hospital. We have discussed this with Network Rail and the Royal Surrey County Hospital.
- We have met with Highways England to discuss the north facing junctions to the A3 proposed at the A247 Burnt Common interchange in the Regulation 19 Local Plan (2016) and subsequently. These are the schemes referenced SRN9 and SRN10 in the Infrastructure Schedule at Appendix C of the Submission Local Plan. Highways England has indicated that, in Local Plan-making terms, it has no objection to the new slips in principle subject to various caveats. These are that the promoter of the scheme be able to demonstrate that there is no adverse impact to the safety of the A3 and its users including compliance with the Design Manual for Roads and Bridges, a positive business case including affordability, all necessary consents can be secured, and all related design and construction works including commuted sums can be funded. Guildford Borough Council considers that schemes SRN9 and SRN10, allocated in site Policy A43a, are deliverable. Work is ongoing to demonstrate the Council’s position.

4.116 It is also noteworthy that we have prepared and published four issues of the Guildford Borough Transport Strategy, starting with the first issue in April 2016. This sets out a programme of schemes covering all modes of surface transport in the borough and beyond. For the preparation of the first issue of the strategy, a draft was sent to adjoining local authorities, Surrey County Council, Highways England, Network Rail, South West Trains and Great Western Railway for review and

comment. This process of informal consultation with partners was repeated in the preparation of the June 2017 version of the strategy. The Guildford Borough Transport Strategy 2017 (Guildford Borough Council, December 2017), which is the fourth issue of the document, is transport evidence base supporting the Submission Local Plan.

#### *Formal stages of public consultation*

- 4.117 The formal stages of public consultation have elicited representations from prescribed bodies, including the neighbouring councils, and other transport infrastructure and service providers and relevant parties, on issues and options, strategic priorities, strategic policies and site policies, amongst other matters, including relating to the spatial strategy and transport challenges and opportunities in Guildford borough and beyond. We also received a significant volume of comment from the public, developers and other parties. The Council has reviewed all duly made representations and the main issues have informed the Council's Local Plan-making process, including the transport planning workstream.
- 4.118 We have followed up and have addressed, or are in the process of addressing, main issues raised by the prescribed bodies, neighbouring councils including county councils, and other key organisations (see Appendix 5, 6 and 7)
- 4.119 Our meetings, communications, involvement in studies and other cooperation has informed the preparation of the Submission Local Plan, including:
- Policy ID1: Infrastructure and delivery
  - Policy ID2: Supporting the Department for Transport's "Road Investment Strategy"
  - Policy ID3: Sustainable transport for new developments
  - Numerous site policies, specifically requirements for transport schemes and mitigation and also potential opportunities
  - Appendix C: Infrastructure Schedule, which sets out the key infrastructure requirements on which the delivery of the plan depends.

#### **Green Belt**

- 4.120 The Green Belt is a strategic issue which we share with all of Surrey. As each local authority considers whether there are exceptional circumstances to justify amending Green Belt boundaries, it is important that there is consistency in approach. The majority of our Green Belt and Countryside Study (GBCS) was undertaken before 2012, when we were still working under regional planning with the South East Plan and before the duty to cooperate was introduced. It was commissioned in response to the selective review of the Green Belt for 2,000 homes identified in the final version of the South East Plan. This was subject to a successful legal challenge on the basis of a lack of assessment of reasonable alternative options. As a result, the housing target for Guildford was struck out of the plan. The GBCS sought to assess potential sites that could be removed from the Green Belt should there be insufficient land within the urban areas to meet identified needs.
- 4.121 As the broad methodology that underpins the study was developed prior to the NPPF and Localism Act, we did not engage with neighbouring authorities at that time. However, we did undertake a review of the evidence base by the Joint scrutiny Committee, which included the GBCS, in early 2014. As part of this process we held a forum during which concerns could be raised by all stakeholders in relation to methodology or accuracy of data. As part of exploring some of the concerns related to how certain Green Belt purposes were assessed, the consultants considered a



number of alternative Green Belt studies that had been undertaken more recently. This process led to a change in the way two purposes are interpreted within the study.

- 4.122 This has ensured that our broad methodology is consistent with that used by other local authorities in Surrey in studies that have since been undertaken. We have also provided comments or taken part in all workshops to which we have been invited to do so. We consider our comments have been constructive with particular focus on the extent to which they are consistent with both the approach and findings of our study. We have also advocated an approach that is not overly restrictive in order to identify a range of potential development areas which can be considered alongside other sustainability considerations to maximise opportunities for meeting needs.

### **Surrey Hills Area of Outstanding Natural Beauty**

- 4.123 The Surrey Hills Area of Outstanding Natural Beauty (AONB) extends across Guildford, Mole Valley, Reigate and Banstead, Tandridge and Waverley. The Countryside and Rights of Way Act (2000) places a statutory duty on AONB local authorities to produce and review Management Plans that will formulate their policy for the management of the area. This Management Plan has been prepared by the Surrey Hills AONB Board and is adopted by all five councils and Surrey County Council. It was adopted by Guildford on 28 October 2014. The AONB Board, which includes a councillor from each local authority and a representative from Natural England, is supported by an officer working group in preparing the current Surrey Hills Management Plan (2014 – 2019). Policy P1 of the Proposed Submission Local Plan requires that development proposals are assessed against the provisions of this plan.
- 4.124 In January 2013, the AONB Partnership commissioned landscape consultants Hankinson Duckett Associates (HDA), through Surrey County Council. They were required to conduct a search for areas that might be considered for re-designation as AONB. This was a two part study<sup>3</sup>. The first stage was to review the Surrey Landscape Character Assessment (LCA). This study was prepared to be compatible with, and incorporated, the Guildford LCA<sup>4</sup>. The second stage was to look for candidate areas that meet the criteria which contribute to natural beauty as set out in the current Natural England Guidance published in March 2011.
- 4.125 In November 2013, the Surrey Hills AONB Board formally submitted a request that Natural England consider a modification to the AONB boundary based on the 38 candidate areas identified by HDA. In February 2014, the Natural England Board agreed to consider the evidence submitted on the candidate areas within their current corporate plan period which extends up to 2019. We expect that Natural England will be able to consider the evidence presented by Surrey Hills AONB at the earliest in 2018. Policy P1 of the Proposed Submission Local Plan retains the Area of Great Landscape Value designation until such time as this boundary review is complete.

### **Green and Blue Infrastructure**

- 4.126 As set out above, whilst not subject to the duty, we are required to cooperate with and have regard to the activities of Local Nature Partnerships. For us this constitutes the Surrey Nature Partnership (SyNP), the designated Local Nature Partnership for Surrey. SyNP has developed a strategic approach to biodiversity based around Biodiversity Opportunity Areas (BOAs) across Surrey. We agree that their approach

<sup>3</sup> Available online at: [www.guildford.gov.uk/newlocalplan/protectinganddesign](http://www.guildford.gov.uk/newlocalplan/protectinganddesign) (2013)

<sup>4</sup> Available online at: [www.guildford.gov.uk/landscapecharacterassessment](http://www.guildford.gov.uk/landscapecharacterassessment) (2007)

is robust and meets the requirements of the NPPF and the Natural Environment and Rural Communities Act (NERC) 2006 so we have adopted this approach in the Submission Local Plan rather than developing an alternative one. Meetings were held with SyNP during policy development, and feedback received from SyNP during the regulation 18 and 19 consultations have helped develop the policy, with the result that the approach to biodiversity within the borough is coordinated with the strategic approach for Surrey. The way in which we will implement this approach is discussed in greater detail in the Green and Blue Infrastructure Topic Paper.

- 4.127 A number of prescribed bodies were contacted as part of the preparation of the Open Space study in order to understand cross boundary issues. The feedback was incorporated into the final study and included contact with the Guildford Borough Council Public Health Coordinator who coordinates the Guildford Health and Well-being Board (discussed further below under Health). This recognises the important role that access to well managed open spaces provides in relation to reaching health and wellbeing targets for the borough. We also sought views from the Surrey County Council Countryside and Rights of Way Service who referred to the Rights of Way Improvement Plan for Surrey (Revised 2014) which is the overall policy and strategy guiding the rights of way service with an emphasis on multi-user routes and green transport.
- 4.128 In addition to these, we also contacted our neighbouring authorities to understand the evidence base that has already been prepared in relation to green infrastructure and to identify any cross boundary issues. The information and findings from all stakeholders were taken forward in the main Open Space Study report.
- 4.129 Rushmoor also identified that the delivery of the Blackwater Valley Countryside Strategy required actions from both councils. The Blackwater Valley, which straddles the borough boundary, is identified as a BOA. As a result, our policy will seek measures that lead to improved habitat management and efforts to restore and re-create priority habitats. A number of councils raised the issue of SPA/SANG which is discussed separately below.
- 4.130 We have also responded positively to a number of comments made by the Environment Agency to the draft Local Plan (2014). The Policies Map now includes Special Areas of Conservation (SAC) and they are listed alongside the SPA in terms of status and protection they have in Policy ID4. The policy has also been strengthened to include support for the implementation of the Water Framework Directive and the use of guidance from the Environment Agency and Natural England on implementation of the Wey Catchment Plan and flood risk management.

#### **Thames Basin Heaths Special Protection Area (SPA) / Suitable Alternative Natural Greenspace (SANG)**

- 4.131 The Thames Basin Heaths, which covers parts of Surrey, Hampshire and Berkshire, is a rare example of lowland heathland. It is home to three important bird species, and protected by international law as a 'Special Protection Area' (SPA).
- 4.132 The relevant councils and other partners have established the Thames Basin Heaths Joint Strategic Partnership (JSP) to plan for the long-term protection of the SPA in a consistent and coordinated way. The Board is advised by a number of bodies including Natural England.
- 4.133 The Thames Basin Heaths JSP Board comprises:
- Bracknell Forest Borough Council

- Elmbridge Borough Council
- Guildford Borough Council
- Hart District Council
- Royal Borough of Windsor and Maidenhead
- Runnymede Borough Council
- Rushmoor Borough Council
- Surrey Heath Borough Council
- Waverley Borough Council
- Woking Borough Council
- Wokingham Borough Council
- Hampshire County Council

4.134 Natural England has agreed a three pronged approach to overcome the adverse effects on the SPA which arise mainly from the recreational use of the SPA by local people and the effects of urbanisation. This approach is set out in Guildford borough's Thames Basin Heaths SPA Avoidance Strategy 2017 Supplementary Planning Document (the SPA Strategy)<sup>5</sup>, and the draft Thames Basin Heaths SPA Avoidance Strategy SPD 2016 which follows the recommendations in the Thames Basin Heaths Special Protection Area Delivery Framework 2009.

4.135 The three prongs are:

- The provision of SANG to attract people away from the SPA
- Monitoring of the SPA and access management measures to reduce the impact of people who visit the SPA
- Habitat management of the SPA to improve the habitat for the ground nesting birds.

4.136 The third prong is delivered by Natural England. The second prong is delivered by the JSP Board and Natural England, although we collect funding to enable the work. We have responsibility for ensuring that SANG avoidance is provided when granting permission for new residential developments that would have an impact on the SPA.

4.137 We have worked closely with Natural England to ensure the quantum and distribution of growth identified in the Proposed Submission Local Plan is deliverable by demonstrating there is sufficient SANG available across the borough, as set out in the Infrastructure Delivery Plan. Alongside this work, we have updated the SPA Strategy, which provides guidance for existing policy NRM6 of the South East Plan and Submission Local Plan Policy P5. This strategy has been produced with significant feedback and cooperation with Natural England, and has incorporated feedback from other JSP Board members, with the result that the strategy was amended to improve the coordination of the approach with other boroughs and districts in the SPA affected area.

4.138 Given the catchment areas that surround SANGs, we have cooperated with some of our neighbouring boroughs to explore opportunities for cross boundary SANGs. We have considered proposals for two cross boundary SANGs, one with Waverley Borough Council and one with Rushmoor Borough Council, and have discussed the possibility of sharing SANG capacity with Woking Borough Council. We will continue cooperating on this matter as appropriate to ensure that sufficient SANG is delivered to support planned growth.

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<sup>5</sup> Available online at: [www.guildford.gov.uk/tbhspa](http://www.guildford.gov.uk/tbhspa)

## **Flooding**

- 4.139 The Environment Agency (EA) had raised concerns during the Local Plan (2014) consultation regarding the lack of an up-to-date SFRA. We have worked closely with the EA in preparing the flood risk evidence base that underpins the Proposed Submission Local Plan. The EA attended the inception meeting with consultants, Capita, who were procured to update our Strategic Flood Risk Assessment (SFRA), last prepared in 2009. This enabled us to understand the scope and requirements of the study and agree the key stakeholders who would need to be involved as part of the work. This included officers at Surrey County Council as the Lead Local Flood Authority.
- 4.140 As part of identifying the scope, a study area catchment boundary was agreed that stretched beyond administrative boundaries. This reflects the difference between hydrological catchment boundaries and administrative boundaries and acknowledges that development outside Guildford borough can have an impact on local catchments. The Level 1 SFRA (volume 1, 2, and 3) has now been signed off by the EA.
- 4.141 Whilst the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development, it concludes that there is insufficient land outside of the area of flood risk to meet identified development needs. We have now also prepared a flood risk sequential test and Level 2 SFRA to help us apply the sequential and, where necessary, the exceptions test. Whilst the EA gave us informal assistance throughout this process, we formally consulted with them as part of the Regulation 19 Local Plan (2016) consultation.
- 4.142 Following this consultation, we met with the EA to talk in more detail through their comments. We prepared and agreed a set of actions to address their objections. A number of comments were made in relation to the flood risk sequential and exceptions tests. These have been noted and have been addressed to support the submission Local Plan. The EA also commented that further evidence is required in relation to safe access and egress for three site allocations. This has been done as part of an update (addendum) to the Level 2 SFRA to also support the Submission Local Plan. The Level 2 SFRA Addendum also addresses comments made by the EA to the Regulation 19 Local Plan (2017). In particular, it explains the modelling used in the Level 2 SFRA to assess flood risk on the allocated sites; and provides information in relation to the need for developers to factor in allowances for climate change in site-specific flood risk assessments in line with updated national planning guidance on this subject.
- 4.143 A further comment made to the Regulation 19 Local Plan (2016) related to the lack of evidence relating to environmental capacity and water quality, and the impact of the growth being proposed in terms of the sewerage infrastructure needs and the impact of Water Framework Directive (WFD) objectives. To address this concern we prepared the Water Quality Assessment. The initial methodology was agreed with the EA and a targeted consultation was undertaken with both the EA and Thames Water prior to finalising the work. The methodology was refined further to address their concerns on the type of modelling undertaken.
- 4.144 We have also been working with the EA in relation to site allocation policies A2: Guildford Cinema, Bedford Road, Guildford and A9: 77 to 83 Walnut Tree Close, Guildford. These sites are within high flood risk areas however we are working with them to explore how the sites could be delivered for the leisure and office uses that

they are proposed to be allocated for whilst achieving flood risk betterment on site and not increasing flood risk elsewhere.

- 4.145 As part of the 2014 consultation, the EA recommended that the plan include a strategic flood risk and water quality policy. The Regulation 19 Local Plan (2016) responded to this concern with the introduction of Policy P4: Flood risk and water source protection zones. This has been amended in the Regulation 19 Local Plan (2017) to take account of further comments by the EA. This policy, and the amendments made to it, are discussed in greater detail in the Flood Risk Topic Paper.
- 4.146 Guildford Borough Council has worked with its partners, Surrey County Council, the Environment Agency, Thames Water and Network Rail, which comprise a project steering group, to produce a Surface Water Management Plan for the borough. The aims and methodology used for the Surface Water Management Plan agreed by the project steering group was also followed in producing the 'Ash Surface Water Study', a separate document which provides a long-term surface water management plan for the predominantly rural area in the west of the borough which drains to the River Blackwater. The two studies identify measures that all partners can take to reduce the risk of surface water flooding. These range from better-targeted maintenance to proposals for capital projects for flood protection schemes. The Action Plans also identify costs and responsibilities for each project.
- 4.147 Developers of the strategic sites identified within the Submission Local Plan and other sites in the borough (as considered necessary) will be required to fund suitable measures to minimise surface water run-off produced from their development proposals. This requirement was included in policies P4 and ID1.
- 4.148 Whilst not yet at a stage that can inform the Submission Local Plan, there is also ongoing joint work being undertaken with the EA and our Major Projects team in relation to the River Wey flood alleviation scheme<sup>6</sup>. This project is being led by the EA whose other partners include Surrey County Council, Thames Water, M3 Enterprise Local Enterprise Partnership, Thames Regional Flood and Coastal Committee, the National Flood Forum and the Guildford Flood Action Group, to develop a scheme in line with this study. Detailed design work in relation to the Guildford town centre scheme will be undertaken in Spring 2018. We will continue to cooperate on this matter with the aim of reducing flooding to as many properties as possible. Depending on the outcomes, this project may inform our decision on whether it is appropriate to prepare a Town Centre Area Action Plan in the future.

## **Education**

- 4.149 As part of preparing our Local Plan, we have worked closely with Surrey County Council to understand the education needs for the borough. We published the Guildford Local Plan Education Review<sup>7</sup> prepared by Surrey County Council which sets out the impact that both demographic changes and planned housing identified in the Regulation 19 Local Plan (2016) will have on the level of education need, the geographic impact of this need and the likely timescales.
- 4.150 This note lists the temporary and permanent expansions in the primary sector which have occurred within the last few years. This bulge in pupil yield is expected to affect the secondary sector from 2017 onwards. There are plans to expand two secondary

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<sup>6</sup> Available online at: <https://www.gov.uk/government/publications/guildford-flood-alleviation-scheme/guildford-flood-alleviation-scheme#funding>

<sup>7</sup> Available online at: [www.guildford.gov.uk/infrastructureevidence](http://www.guildford.gov.uk/infrastructureevidence) (May 2016)

schools to help cope with expected demand from demographic growth. In addition to the existing population need, there will also be need arising through planned growth in our emerging Local Plan.

- 4.151 We considered 20 potential secondary schools sites, which are listed in an Appendix to the Land Availability Assessment (2017). Through discussions with Surrey County Council's school commissioning and strategic planning teams, we are proposing to allocate land for three new primary schools (Blackwell Farm, Gosden Hill, and former Wisley airfield). We have had further discussions with Surrey County Council in relation to secondary school provision. The changes in housing numbers and site allocations in the Regulation 19 Local Plan (2017) have been reflected in changes to the proposed secondary school allocations. We are continuing to allocate two secondary schools to meet needs arising in the east with a four form of entry school at Gosden Hill and a four form entry at the former Wisley airfield. Secondary school provision in the west has however changed – it is now principally being met through a six form entry secondary school on Blackwell Farm with a further one form entry expansion at Ash Manor to meet the needs arising around Ash and Tongham. Surrey County Council always preferred a potential new school on Blackwell Farm over the previously identified school site at Normandy and Flexford, however this site was not available for this use at the time we were preparing the Regulation 19 Local Plan (2016).
- 4.152 As part of our cooperation with Surrey County Council on education matters, we have involved neighbouring boroughs, where there are cross boundary catchment areas, in order to understand the cumulative impact of development. This includes cooperation with Hampshire County Council, given the number of secondary age Hampshire children that currently attend secondary school in Ash and Tongham, and are likely to continue to do so. Surrey County Council and Hampshire County Council will continue to monitor this in light of growth that is already occurring in Ash and Tongham, the current development progressing at Aldershot Urban Extension and the army re-basing programme.

## **Health**

- 4.153 Clinical Commissioning Groups (CCGs) replaced Primary Care Trusts in April 2013. There are three CCGs covering the borough:
- Guildford and Waverley CCG
  - North West Surrey CCG
  - Surrey Heath CCG
- 4.154 The vast majority of the borough falls within Guildford and Waverley CCG, with the far west of the borough falling within Surrey Heath CCG, and the Pirbright area (which will not see much development due to proximity to the SPA) falling within the North West Surrey CCG. For this reason most of our work has been with Guildford and Waverley CCG.
- 4.155 We have met with representatives of the CCGs operating in Guildford borough, and with NHS England numerous times since their inception to be able to understand the likely estate-related health needs arising from the planned growth. We have included an allocation for health facilities on the following strategic sites: Blackwell Farm, Gosden Hill and former Wisley airfield. Furthermore Appendix C: infrastructure schedule of the Submission Local Plan identifies further GP provision to meet the needs arising elsewhere in the Borough (for example within the Ash and Tongham area).

- 4.156 We have also provided input into the Guildford Health and Wellbeing Board. This partnership includes Guildford and Waverley councils, Surrey Health Clinical Commissioning Groups and Surrey County Council. As part of this partnership, we published the Guildford Health and Wellbeing Strategy 2015 – 2017. This strategy sets local priorities and identifies how partners will work together to co-ordinate to deliver a work plan for 2015-2017. A review of the strategy has been undertaken following a public meeting of the Health and Wellbeing Board in 2016. This has resulted in revisions to the Strategy and an update to cover the period 2017 – 2022. The Board is carrying out an ongoing review of each of the action plans and the way these are presented in order to make them clearer and to celebrate success.
- 4.157 With regard to the Oaks Surgery in the west of the Guildford Urban Area and the anticipated lack of space to meet future needs, we are working with Surrey County Council, Guildford and Waverly CCG, the local GPs Practice, NHS England and the local community. The aim is to establish a new community hub building, providing primary health care facilities, youth facilities and community meeting rooms. . This vacant former special school is proposed for allocation in the Submission Local Plan for a medical, and youth and community centre, with approximately 10 homes (which are needed to help fund the facility). The will help to improve the health and social inclusion outcomes within the area.

### **Services and utilities (including minerals and waste)**

- 4.158 Many of our services and utilities are provided by private companies and organisations that are not listed as prescribed bodies however with whom we must cooperate to ensure that the necessary infrastructure is in place to support planned growth. Our Infrastructure Delivery Plan (IDP) details the relevant lead agencies, the existing provision and the planned provision required to support the growth identified in the Submission Local Plan. Alongside other boroughs and districts, we have also worked with Surrey County Council, whose consultant AECOM, produced the Surrey Infrastructure Study<sup>8</sup>. Surrey County and AECOM engaged a wide range of stakeholders to inform the study including county and district council service providers, transport operators, utility companies, higher education providers, Clinical Commissioning Groups, the Environment Agency, Surrey Nature Partnership and the Coast to Capital and Enterprise M3 Local Economic Partnerships. This study is currently being updated and will reflect the proposals in the Submission Local Plan. This is expected to be finalised early 2018.
- 4.159 As part of progressing site policy A24 (Slyfield Area Regeneration Project), we are working closely with Surrey County Council and Thames Water, our partners in this project. This allocation contains provision for a new (replacement) waste management facility on site. The development will involve the replacement of the existing Community Recycling Centre (CRC) with a larger, more modern facility incorporating additional recycling tanks and parking, a new Surrey County Council waste transfer station and new works depot for Guildford Borough Council.
- 4.160 In relation to the site at the former Wisley airfield, this site includes land which is currently allocated in the Surrey Waste Plan 2008 for waste development and safeguarded in the Aggregates Recycling Joint Development Plan Document 2013 as having potential for production of recycled and secondary aggregates, and for an aggregate recycling depot. Surrey County Council submitted comments to the refused planning application (currently at appeal) for this site (Ref: 15/P/00012) that

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<sup>8</sup> Available online at: [www.surreycc.gov.uk/environment-housing-and-planning/development-in-surrey/surrey-future/surrey-infrastructure-study](http://www.surreycc.gov.uk/environment-housing-and-planning/development-in-surrey/surrey-future/surrey-infrastructure-study) (January 2016)

the proposal would have an unacceptable impact on the provision of such facilities and is therefore contrary to these development plans.

- 4.161 Surrey County Council is currently in the process of reviewing the Surrey Waste Plan. Surrey County Council carried out an 'Issues and Options' consultation and a 'Call for Sites' in 2016. We understand that this site is no longer available for waste uses and Surrey County Council has confirmed that there is currently no justification or intention to compulsorily purchase the site for waste uses. Furthermore, this site has now been excluded as a proposed site for the delivery of waste management infrastructure at the preliminary sieving stage as part of the Draft Surrey Waste Local Plan (October 2017), which is being consulted upon and is intended to replace the Surrey Waste Plan (2008). We therefore do not expect this site to be safeguarded in the new Waste Plan.
- 4.162 The promoter of former Wisley airfield has indicated that they intend to reuse the aggregates that exist on part of the site in the form of the former runway as part of their development. This will help minimise the level of construction related vehicle movements that is required to and from the site. We continue to work with Surrey County Council in relation to its Minerals and Waste planning function.

## 5 Local Plan Policy Approach

- 5.1 As a result of the constructive, active and ongoing cooperation as demonstrated within this paper, we consider that the Local Plan approach is effective in the context of strategic cross boundary matters.

## 6 Next steps

- 6.1 The draft Local Plan strategy responds to the requirements of national policy, legislation and the results of our evidence.
- 6.2 This topic paper accompanies the Submission Local Plan: strategy and sites that is submitted to the Secretary of State in December 2017. For more information please visit: [www.guildford.gov.uk/newlocalplan](http://www.guildford.gov.uk/newlocalplan)



## Appendix 1: Matrix of prescribed bodies and strategic issues

	Housing	Gypsies and Travellers	Employment and retail	Transport	SPA / SANG	Green Belt	AONB	Infrastructure (including health and schools)	Flooding and waterways	Waste	Natural environment and open space
Surrey County Council	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Elmbridge Borough Council	✓	✓		✓	✓	✓		✓	✓		✓
Epsom and Ewell Borough Council		✓									
Mole Valley District Council		✓				✓	✓	✓	✓		✓
Reigate and Banstead Borough Council		✓					✓				
Runnymede Borough Council	✓	✓			✓						
Spelthorne Borough Council		✓									
Surrey Heath Borough Council	✓	✓			✓	✓		✓			✓
Tandridge District Council		✓					✓				
Waverley Borough Council	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
Woking Borough Council	✓	✓	✓	✓	✓	✓		✓	✓		✓
Hampshire County Council				✓	✓			✓	✓	✓	
Hart District Council					✓						
Rushmoor Borough Council	✓	✓	✓	✓	✓			✓	✓		✓
<b>Prescribed Bodies</b>											
Civil Aviation Authority				✓							
Clinical Commissioning Groups (CCG)											
• Guildford and Waverley CCG								✓			
• North West Surrey CCG											
• Surrey Heath CCG											
Environment Agency									✓	✓	✓
Enterprise M3 LEP	✓		✓	✓				✓			
Highways England				✓							
Historic England	✓		✓								
Homes and Communities Agency (HCA)	✓	✓									
Mayor of London	✓	✓	✓			✓					
National Health Service Commissioning Board								✓			
Natural England					✓		✓				✓
Office of Rail and Road				✓							
Surrey Nature Partnership											✓
Transport for London				✓							

# **Appendix 2: Surrey Strategic Planning and Infrastructure Partnership – Memorandum of Understanding**

## **Memorandum of Understanding ('the Memorandum')**

### **1. Introduction**

Surrey Leaders have agreed to meet for the purposes set out in the Terms of Reference for the Surrey Strategic Planning and Infrastructure Partnership dated [ ].

This Memorandum sets out the basis on which Surrey Leaders have agreed to work together for those purposes, and in particular to help meet the requirements of the Duty to Cooperate through a programme of work undertaken irrespective of plan making timetables at individual authorities.

Under section 33A of the Act (amended by section 110 of the Localism Act 2011) and in accordance with the National Planning Policy Framework (NPPF) it is a requirement under the Duty to Cooperate for local planning authorities, county councils and other named bodies to engage constructively, actively and on an on-going basis in the preparation of development plan documents and other local development documents. This is a test that local authorities need to satisfy at the Local Plan examination stage, and is an additional requirement to the test of soundness. The Duty to Cooperate applies to strategic planning issues of cross boundary significance. The Districts and Boroughs within Surrey are currently all at various stages of Local Plan preparation. However, they all have common strategic issues and as set out in the National Planning Practice Guidance (NPPG) '*local planning authorities should make every effort to secure the necessary cooperation on strategic cross boundary matters before they submit their Local Plans for examination.*' The statutory requirements of the Duty to Cooperate are not a choice but a legal obligation. Whilst the obligation is not a duty to agree, cooperation should produce effective and deliverable policies on strategic cross boundary matters in accordance with the government policy in the NPPF, and practice guidance in the NPPG.

### **2. Working in partnership**

The Memorandum sets out a framework for joint working between the local authorities which are represented by the Leaders of each authority who have each signed it ('the Signatories'). It sets out where cooperation will take place and identifies key outcomes. The Memorandum will be reviewed regularly to ensure it is compliant with the statutory duty and the NPPF, and is otherwise fit for purpose and up to date

It is essential that in producing evidence and seeking to deliver outcomes Districts and Boroughs work together in an effective way. It is particularly essential that when evidence on a cross boundary basis is required by an individual District/Borough (or grouping) other Districts and Boroughs will respond positively and in a timely manner. Periodically the Signatories may agree to action to be taken to a common timeframe.

The Signatories will cooperate on the basis that amended evidence bases do not invalidate existing tested plans (see NPPG paragraph 30 ref ID 3-030-20140306). Whilst this applies to housing need assessments and 5-year housing supplies it is considered that this is the main area where there is a real potential for shifts in the evidence base.

### **3. Evidence Base**

The local authorities in Surrey have identified key strategic areas of evidence gathering and technical work that require joint working and could be subject to separate arrangements for combined working/commission. This evidence base will be set on an agreed common methodology. This includes:

- Identification of all housing need<sup>9</sup>, including agreement on Housing Market Areas and agreement to prepare an up to date Strategic Housing Market Assessment.
- Economy and employment needs and opportunities
- Strategic infrastructure with strong links to work with Enterprise M3 LEP and Coast to Capital LEP on their strategic economic plans and funding bids/programmes
- Development of strategic growth options across the County (principally housing integrated with jobs and required infrastructure/services)
- Constraints such as, AONB, Special Protection Areas and Special Areas of Conservation and flooding.
- Green Belt designation

As a matter of principle before undertaking any technical studies the Districts and Boroughs will explore with other authorities where there is scope for joint studies using a common methodology.

### **4. Housing Market Areas**

Government policy places much emphasis on housing delivery as a means for ensuring economic growth and addressing the current national shortage of housing. Consequently, it is critical at Local Plan Examinations to ensure that local authorities are exploring all possible means to meet the objectively assessed housing need in their housing market area. Paragraph 47 of NPPF is very clear that 'local planning authorities should use their evidence base to ensure that their local plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this framework...'. District and Boroughs are already co-operating on work in this regard and will continue to make that commitment.

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<sup>9</sup> Housing need includes Gypsy, Traveller and Travelling Showpeople accommodation

There are already several Strategic Housing Market area Assessments (SHMAs) underway or completed. These would form a good basis to understand the degree of consensus from a technical point of view of Housing Market Areas (HMAs) in the County and adjoining authorities. This exercise should be completed in late 2014 once all districts and boroughs have an up to date SHMA.

## **5. Infrastructure**

It is considered that this should be split between strategic infrastructure identified at a LEP level and local infrastructure that each authority will continue to pursue working in partnership as appropriate. The sound work done to date by Surrey Future is key and it is valuable that work has been done to map infrastructure in Surrey and collaborate with the LEPs on bidding for funding. For credibility and collaboration this will need to connect closely with existing local plans and infrastructure delivery plans. The local authorities will continue to co-operate and work in partnership on infrastructure primarily through Surrey Future.

## **6. Other strategic issues**

The local authorities and other partners have acknowledged that there are other strategic matters that they could work in partnership to address. Paragraph 178 of the NPPF stresses that public bodies have a duty to cooperate on planning issues that cross administrative boundaries such as

- provision of retail, leisure and other commercial uses;
- the provision of health, security, community, water supply, waste management and cultural infrastructure;
- the provision of minerals and energy
- climate change mitigation and adaptation; and
- green infrastructure

Where relevant, the local authorities will work together to address these matters if it is considered beneficial to do so.

## **7. Working arrangements**

The work set out in this Memorandum will be led on a day to day basis by the lead planning officer for each of the local authorities in Surrey through the Surrey Planning Officers Association (SPOA). SPOA will meet monthly and will liaise with the Surrey economic development officers and Planning Working Group as necessary. Work will be commissioned, where appropriate, singly, jointly or severally by the local authorities which are represented by the signatories to this Memorandum though the appropriate procurement processes of the lead authority and arrangements to finance any work commissioned will be made through a separate agreement.

SPOA will report, through the Chair, to the Surrey Chief Executives and thereafter to the Joint Leaders Board. This governance structure will be formalised and protocols put in place for reporting and for administration.

## **8. Limitations**

The purpose of the Memorandum is to facilitate joint working of the local authorities which are represented by the Signatories as set out in the Terms of Reference.. The Memorandum does not seek to restrict or fetter the discretion of any of the authorities in the exercise of its statutory functions and powers, or in its response to consultation or determining planning applications.

### **Signatories**

Leaders  
Elmbridge  
Epsom and Ewell  
Guildford  
Mole Valley  
Reigate and Banstead  
Runnymede  
Spelthorne  
Surrey County Council  
Surrey Heath  
Tandridge  
Waverley  
Woking

# Appendix 3: Surrey Strategic Planning and Infrastructure Partnership – Terms of Reference

## SURREY STRATEGIC PLANNING AND INFRASTRUCTURE PARTNERSHIP

### Terms of Reference

#### 1. Objectives

- 1.1 The Signatories to a Memorandum of Understanding dated [ ] have agreed to meet for the purposes set out in these terms of reference to provide a vehicle for cooperation and joint working between local authorities within Surrey.
- 1.2 The Signatories will address matters relating to: (i) the Duty to Cooperate to comply with section 33A of the Planning and Compulsory Purchase Act 2004; (ii) infrastructure investment and funding streams; (iii) strategic planning interaction with Greater London and other adjoining and relevant authorities and (iv) associated planning issues that are of joint interest to the member organisations. In summary:
  - To identify and co-operate on spatial planning issues that impact on more than one local planning area across Surrey; and
  - To support better integration and alignment of strategic spatial, infrastructure and investment priorities across Surrey.
- 1.3 The Signatories are acting together in accordance with their powers under sections 13, 14 and 33A of the Planning and Compulsory Purchase Act and section 1 of the Localism Act 2011 for the purposes set out above by:
  - Providing a framework to evidence that the Local Authorities are working ‘constructively, actively and on an ongoing basis’ on strategic planning matters to support delivery of Local Plans which will be able to be assessed as ‘sound’.
  - Being ‘spatially specific’ where there is a strategic focus on particular areas within Surrey or overlaps with adjoining areas.
  - Providing a basis for working collaboratively with the GLA/Mayor and other authorities on the long term growth of London, particularly in relation to the next full review of the London Plan and the Mayor’s Long Term Infrastructure Plan.
  - Integrating strategic spatial, economic and infrastructure priorities for Surrey with a clear set of (agreed) objectives for delivering ‘sustainable’ prosperity in Surrey. This should build on the priorities in Surrey Future, the Strategic Economic Plans and local plans and collaboration with the LEPs and Surrey Local Nature Partnership.
  - Providing a positive voice for Surrey, setting out its case for investment and why it is important to the national economy.

- Helping to align business/investment priorities of other key bodies, e.g. Environment Agency, transport operators and utility companies.
- 1.4 The Signatories will act to deliver cooperation across the Surrey area to maximise the effectiveness of plan making, infrastructure delivery, growth and a single strategic voice in respect of Greater London planning issues.
- 1.5 The Signatories will put in place a single agreed framework, in the form of a Memorandum of Understanding, within which the Duty to Cooperate can be undertaken on an ongoing and rolling programme irrespective of individual plan making timetables of individual authorities.
- 1.6 For the avoidance of doubt, the Signatories cannot exercise any of the functions of a planning authority or competent authorities, including setting formal planning policy or exerting control over planning decisions, nor can they fetter any decisions made by other bodies such as the LEPs.

## 2. Functions

### 2.1 The Signatories will :

- agree frameworks for working effectively at a strategic planning and infrastructure level to ensure the best and most appropriate outcomes for Surrey through the Duty to Cooperate
- act together as a vehicle for joint working, liaison and exchange of information related to the Duty to Cooperate
- agree a spatially specific strategic vision for Plan and infrastructure delivery
- retain an overview of, and monitor, the implementation of projects and plan making across Surrey and the wider area of influence.
- identify the sustainable development issues that impact on more than one local planning area and agreeing how these should be prioritised and managed (covering the whole local plan cycle from plan-making, through to delivery and monitoring)
- support better integration and alignment of strategic spatial and investment priorities in the Surrey area, ensuring that there is a clear and defined route through the statutory local planning process, where necessary

### 2.2 In carrying out these functions, the Signatories may, subject to the necessary procurement arrangements and authorities being put in place by the local authorities represented by them:

- act on behalf of member organisations to commission studies, surveys and reports
- provide advice to member and stakeholder organisations, including making non-binding recommendations for a course of action

### 2.3 Surrey Leaders may review these terms of reference at any point.

### 3. Meetings of the Signatories

- 3.1 The Signatories may invite key stakeholders to attend their meetings as may be agreed. Minutes of the outcomes of meetings will be made available to the local authorities represented by the Signatories.
- 3.2 Other communication regarding their activities will be agreed by the Signatories.

### 4. Statutory/Non-statutory Duty to Cooperate Bodies

- 4.1 There are a number of public bodies that are subject to the Duty to Cooperate. These are set out in the Town and Country Planning (Local Planning) (England) Regulations 2012 as amended by The National Treatment Agency (Abolition) and the Health and Social Care Act 2012 (Consequential, Transitional and Saving Provisions) Order 2013. These bodies are currently:
- the Environment Agency
  - the Historic Buildings and Monuments Commission for England (known as English Heritage)
  - Natural England
  - the Mayor of London
  - the Civil Aviation Authority
  - the Homes and Communities Agency
  - each clinical commissioning group established under section 14D of the National Health Service Act 2006
  - the National Health Service Commissioning Board
  - the Office of Rail Regulation
  - Transport for London
  - each Integrated Transport Authority
  - each highway authority within the meaning of section 1 of the Highways Act 1980 (including the Secretary of State, where the Secretary of State is the highways authority)
  - the Marine Management Organisation.
- 4.2 The National Planning Practice Guidance suggests that these bodies play a key role in ensuring Local Plans are as effective as possible on strategic cross boundary matters. The Signatories will ensure, through provisions to invite stakeholders when required or through the work undertaken by the Surrey Chief Executives and SPOA, that preparation of a Local Strategic Statement has involved these statutory bodies as far as is proportionate given the policy context under consideration.
- 4.3 Local Enterprise Partnerships and Local Nature Partnerships are not subject to the requirements of the duty. But local planning authorities and the public bodies that are subject to the duty must cooperate with Local Enterprise Partnerships and Local Nature Partnerships and have regard to their activities when they are preparing their Local Plans, so long as those activities are



relevant to local plan making. Local Enterprise Partnerships (LEPs) and Local Nature Partnerships (LNPs) are prescribed for this purpose in Town and Country Planning (Local Planning (England) Regulations as amended by the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012 to include Local Nature Partnerships.

- 4.4 There is existing effective working between Councils, LEPs and LNPs. In this context, the Signatories will ensure that they are aware of Strategic Economic Plans and the delivery of a strategic approach to encouraging biodiversity. The Signatories will ensure, through provisions to invite stakeholders when required or through the work undertaken by the Surrey Chief Executives and SPOA, that preparation of a Local Strategic Statement has involved these bodies as far as is proportionate given the policy context under consideration.
- 4.5 The Signatories will be advised by SPOA via the Surrey Chief Executives.

## Appendix 4: Cooperation with the prescribed bodies

Prescribed body	Strategic issues that the body has been engaged on	Mechanism and methods of cooperation used	Outcome	Local Plan: strategy and sites policy that has been influenced as a result of the process
<b>ORGANISATIONS</b>				
Clinical Commissioning Groups (CCGs)	Health infrastructure	Meetings, emails.	Infrastructure Delivery Plan (chapter 6).	Policy ID1: Infrastructure and Delivery  Specific site policies  Infrastructure schedule
Civil Aviation Authority	No strategic issues identified. CAA act as an independent aviation regulator and provider of air traffic services, which are not identified issues for the Local Plan: strategy and sites	Consulted but no strategic issues raised that require further co-operation.	No identifiable outcome.	No specific policy is directly influenced.
Environment Agency	Flooding, including surface water flooding  Water quality	Consultation at all stages of plan preparation.  Meetings, workshops, emails, letters, telephone.	Setting the scope for the SA  Consultation responses taken into account in preparing the Proposed Submission Local Plan: strategy and sites, Sustainability Appraisal and	Policy P4: Flooding, flood risk and groundwater protection zones  Policy D2: Sustainable design, construction and energy

Prescribed body	Strategic issues that the body has been engaged on	Mechanism and methods of cooperation used	Outcome	Local Plan: strategy and sites policy that has been influenced as a result of the process
	Biodiversity	Consideration of the Thames River Basin Management Plan and EA guidance regarding water quality.	<p>accompanying evidence base</p> <p>Actively involved in the production of the Level 1 and 2 Strategic Flood Risk Assessment</p> <p>Provided advice in the preparation of the Flood Risk Sequential and Exception Test; advised on appropriate wording for incorporation in the Level 2 SFRA 2017 Addendum in relation to ensuring safe access and egress for two sites partially affected by flood risk</p> <p>Actively involved in the production of the Water Quality Assessment 2017</p> <p>Surface Water Management Plans and Action Plans</p> <p>Incorporated optional building regulation 36 2 b on water efficiency into policy, as recommended in the Thames River Basin Management Plan.</p> <p>Incorporated measures to support</p>	<p>Policy ID1: Infrastructure and delivery</p> <p>Policy ID4: Green and blue infrastructure</p> <p>Specific site policies</p>

Prescribed body	Strategic issues that the body has been engaged on	Mechanism and methods of cooperation used	Outcome	Local Plan: strategy and sites policy that has been influenced as a result of the process
			water quality improvements to deliver the outcomes called for in the Water Framework Directive and EA guidance.	
Enterprise M3 Local Enterprise Partnership (LEP)	<p>Employment need and provision</p> <p>Housing need and provision</p> <p>Infrastructure, notably transport</p>	<p>Consultation at all stages of plan preparation, including targeted consultation on the West Surrey Functional Economic Market Area.</p> <p>Work with LEP to identify priorities for using the grant funding allocated to the LEP.</p> <p>Involved in competitive bidding, including with Surrey County Council, to the funding opportunities offered by the LEP, including for housing and transport projects. Various achieved funding.</p> <p>The Council sits representing the seven borough and district councils in the west of Surrey on the LEP's Transport Action</p>	<p>Consultation responses taken into account in preparing the Proposed Submission Local Plan: strategy and sites, Sustainability Appraisal and accompanying evidence base</p> <p>Regeneris Enterprise M3 Commercial Property Market Study 2016</p> <p>Funding achieved for projects including Guildford Town Centre Transport Package, improvement of National Trust's River Wey towpath at Parsonage Watermeadows and Slyfield Area Regeneration Project (SARP)</p> <p>Provisional funding achieved for Unlocking Guildford package.</p>	<p>Policy S2: Planning for the borough our spatial development strategy</p> <p>Policy E1: Meeting employment needs</p> <p>Policy E2: Location for new employment floorspace</p> <p>Policy E3: Maintaining employment capacity and improving employment floorspace</p> <p>Policy E4: Surrey Research Park</p> <p>Policy ID1: Infrastructure and delivery</p> <p>Policy ID2: Supporting the Department for Transport's "Road Investment Strategy"</p> <p>Policy A24: Slyfield Area</p>

Prescribed body	Strategic issues that the body has been engaged on	Mechanism and methods of cooperation used	Outcome	Local Plan: strategy and sites policy that has been influenced as a result of the process
		<p>Group.</p> <p>The LEP is represented at meetings of the Guildford Joint Infrastructure Group.</p> <p>Meetings, emails, letters, telephone.</p>		<p>Regeneration Project</p> <p>Appendix C: infrastructure schedule</p>
Highways England (and its predecessor the Highways Agency)	Transport	<p>Consultation at all stages of plan preparation.</p> <p>Highways England (and formerly Highways Agency) represented at meetings of the Guildford Joint Infrastructure Group.</p> <p>Highways England (and formerly Highways Agency) is represented at the LEP's Transport Action Group, on which the Council sits representing the seven borough and district councils in the west of Surrey.</p> <p>Highways Agency was</p>	<p>Consultation responses taken into account in preparing the Proposed Submission Local Plan: strategy and sites and accompanying evidence base.</p> <p>Infrastructure Delivery Plan (chapter 5).</p> <p>Strategic Road Network schemes in Guildford borough as included in the Road Investment Strategy for the 2015/16 - 2019/20 Road Period (Department for Transport, March 2015)</p> <p>Following meeting of GBC, HE and SCC on 1 September 2016 to explain and clarify the approach</p>	<p>Policy S2: Planning for the borough our spatial development strategy</p> <p>Policy ID1: Infrastructure and delivery</p> <p>Policy ID2: Supporting the Department for Transport's "Road Investment Strategy"</p> <p>Policy ID2: Supporting the Department for Transport's "Road Investment Strategy"</p> <p>Policy ID3: Sustainable transport for new developments</p> <p>Policy A24: Slyfield Area Regeneration Project</p>

Prescribed body	Strategic issues that the body has been engaged on	Mechanism and methods of cooperation used	Outcome	Local Plan: strategy and sites policy that has been influenced as a result of the process
		<p>represented on the Steering Group for the Council's Guildford Town and Approaches Movement Study (GTAMS) in 2013/14.</p> <p>The Council has been represented at various meetings and workshops convened by Highways Agency/Highways England including the A3 Strategic Group, preparation of the first M25 to Solent (A3 and M3) Route Strategy, M25 South West Quadrant Strategic Study, and preparation and delivery of targeted improvement schemes in A3 Guildford.</p> <p>Meetings, emails, letters, telephone, including the Council's response to Highways England's consultation on early proposals for scheme options for improvements to the M25</p>	<p>taken in the Draft Local Plan 2016, Highways England's issued a letter dated 5 October 2016 which revised its representations with respect to various 'issues and concerns' which had been raised in its earlier letter dated 18 July 2016.</p>	<p>Policy A25: Gosden Hill Farm</p> <p>Policy A26: Blackwell Farm</p> <p>Policy A35: Former Wisley airfield</p> <p>Policy A43: Land at Garlick's Arch</p> <p>Policy A43a: Land for new north facing slip roads to/from A3 at Send Marsh/Burnt Common</p> <p>Policy A58: Land around Burnt Common warehouse</p> <p>Appendix C: Infrastructure Schedule</p>

<b>Prescribed body</b>	<b>Strategic issues that the body has been engaged on</b>	<b>Mechanism and methods of cooperation used</b>	<b>Outcome</b>	<b>Local Plan: strategy and sites policy that has been influenced as a result of the process</b>
		junction 10/A3 Wisley interchange in February 2017.		
Historic England (formerly English Heritage)	Historic Environment  Heritage assets	Consultation at all stages of plan preparation  Emails, letters, telephone.	Setting the scope for the SA  Consultation responses taken into account in preparing the Proposed Submission Local Plan: strategy and sites, Sustainability Appraisal and accompanying evidence base	Policy D1: Place Shaping  Policy D3: Historic Environment  Policy D4: Character and Design of New Development
Homes and Communities Agency (HCA)	Housing and affordable housing	Consultation at all stages of plan preparation  Partnership working through the Surrey Enabling Officers Group  Involvement in the production of our Housing Strategies  Regular project management meetings on the Slyfield Area Regeneration Project (SARP) which is classified as a housing zone  Applications for grants to	Consultation responses taken into account in preparing the Proposed Submission Local Plan: strategy and sites  Delivery of affordable homes  Housing Strategy 2015 - 2020	Policy S2: Planning for the borough - our spatial development strategy  Policy H1: Homes for all  Policy H2: Affordable homes  Policy H3: Rural Exception Homes  Policy A24: Slyfield Area Regeneration Project

<b>Prescribed body</b>	<b>Strategic issues that the body has been engaged on</b>	<b>Mechanism and methods of cooperation used</b>	<b>Outcome</b>	<b>Local Plan: strategy and sites policy that has been influenced as a result of the process</b>
		<p>deliver affordable homes</p> <p>Bids for projects under the Housing Infrastructure Fund</p> <p>Meetings, emails, letters, telephone.</p>		
Mayor of London	<p>Housing need and provision</p> <p>Infrastructure</p>	<p>Consultation at all stages of plan preparation</p> <p>Surrey, and therefore Guildford borough, is represented on a Political Steering Group and an Officer Working Group that informs work undertaken by Greater London Authority (GLA)</p> <p>Formal consultation on the Surrey Local Strategic Statement (LSS)</p> <p>Joint Surrey response to draft Mayor's Transport Strategy</p>	<p>The GLA is at an advanced stage in progressing a full review of the London Plan. Its latest demographic projections are 2016-based. The Central Variant projection within these is based on 10 year migration trends. To address consistency issues with areas outside of London, the GLA has published consistent projections to this for local authorities outside London. Over a consistent time period, these GLA projections show household growth in Guildford that is consistent with the findings of the West Surrey SHMA: Guildford Addendum.</p>	<p>No specific policy is directly influenced.</p>
NHS Commissioning	Health infrastructure	Meeting, emails / letters.	Infrastructure Delivery Plan (chapter 6).	Policy ID1: Infrastructure and Delivery



Prescribed body	Strategic issues that the body has been engaged on	Mechanism and methods of cooperation used	Outcome	Local Plan: strategy and sites policy that has been influenced as a result of the process
Board				<p>Specific site policies</p> <p>Appendix C: Infrastructure Schedule</p>
Natural England	<p>Natural environment</p> <p>Biodiversity</p> <p>Thames Basin Heaths Special Protection Area (SPA)</p>	<p>Consultation at all stages of plan preparation, particularly Policy P5: Thames Basin Heaths Special Protection Area</p> <p>Partnership working through the Thames Basin Heaths SPA Joint Strategic Partnership Board (JSPB) and Officer Group</p> <p>Involvement in the production of the Thames Basin Heaths SPA Avoidance Strategy 2017 SPD</p> <p>Partnership working through the Surrey Hills AONB Board</p> <p>Involvement in the preparation of the Habitats</p>	<p>Setting the scope for the SA</p> <p>Infrastructure Delivery Plan (chapter 4).</p> <p>Thames Basin Heaths SPA Avoidance Strategy 2017 SPD</p> <p>Surrey Hills AONB Management Plan 2014 - 2019</p> <p>Commitment to undertake a Surrey Hills AONB boundary review</p> <p>Consultation responses taken into account in preparing the Proposed Submission Local Plan: strategy and sites, Sustainability Appraisal and Habitats Regulations Assessment</p>	<p>Policy P1: Surrey Hills Area of Outstanding Natural Beauty and Area of Great Landscape Value</p> <p>Policy P5: Thames Basin Heaths Special Protection Area</p> <p>Policy ID4: Green and blue infrastructure</p> <p>The Local Plan has been informed by the HRA.</p>

<b>Prescribed body</b>	<b>Strategic issues that the body has been engaged on</b>	<b>Mechanism and methods of cooperation used</b>	<b>Outcome</b>	<b>Local Plan: strategy and sites policy that has been influenced as a result of the process</b>
		Regulations Assessment  Meetings, emails, letters, telephone.		
Office of Rail and Road (formerly Office of Rail Regulation)	Transport	Consultation at all stages of plan preparation.  Email, telephone.	No identifiable outcome.	No specific policy is directly influenced.
Surrey Nature Partnership (SyNP)	Biodiversity	Formal and informal consultation at all stages of plan preparation  Formal meetings to discuss the developing strategies from the SyNP and emerging Local Plan policies.  Emails, meetings.	Emerging SyNP strategies have been incorporated into policy ID4 Green and Blue Infrastructure, notably the identification of Biodiversity Opportunity Areas (BOAs) and the inclusion of measures to support them.  Measures to protect the Thames Basin Heaths (a BOA) have also drawn on SyNP work.	Policy P5: Thames Basin Heaths Special Protection Area  Policy ID4: Green and blue infrastructure
Transport for London	Transport	Consultation at all stages of plan preparation.  Email.	TfL's suggested amendments to the wording in the Transport topic paper have been made.	No specific policy is directly influenced.

Prescribed body	Strategic issues that the body has been engaged on	Mechanism and methods of cooperation used	Outcome	Local Plan: strategy and sites policy that has been influenced as a result of the process
<b>COUNTY COUNCILS AND NEIGHBOURING BOROUGHES AND DISTRICTS</b>				
Surrey County Council	<p>Infrastructure</p> <p>Transport</p> <p>Education</p> <p>Minerals and Waste</p> <p>Flooding</p> <p>Traveller accommodation</p>	<p>Formal and informal consultation at all stages of plan preparation, including a targeted consultation on the TAA questionnaire and draft findings, and the West Surrey Functional Economic Market Area</p> <p>Joint working to assess the traffic impacts of cumulative development in emerging Local Plans for Guildford and Waverley boroughs on the Strategic Road Network and the Local Road Network, and identify key transport schemes.</p> <p>Joint working to assess the education needs arising from planned and demographic growth, and the identification of suitable school sites.</p> <p>Formal and informal</p>	<p>Setting the scope for the SA</p> <p>Surrey Infrastructure Study 2016 and draft 2017</p> <p>Surrey Local Strategic Statement</p> <p>Infrastructure Delivery Plan (chapters 2, 3, 5)</p> <p>Series of strategic highway assessment studies culminating in the Guildford Borough Proposed Submission Local Plan “June 2016”: Strategic Highway Assessment Report (Surrey CC, June 2016)</p> <p>Many of the key infrastructure schemes in the Appendix C Infrastructure Schedule.</p> <p>Guildford Education Review 2016</p> <p>Surface Water Management Plans and Action Plans</p>	<p>Policy P4: Flooding, flood risk and groundwater source production</p> <p>Policy E2: Location for new employment floorspace</p> <p>Policy ID1: Infrastructure and delivery</p> <p>Policy ID2: Supporting the Department for Transport’s “Road Investment Strategy”</p> <p>Policy ID3: Sustainable transport for new developments</p> <p>Policy ID4: Green and Blue infrastructure</p> <p>Appendix C: Infrastructure Schedule</p> <p>Numerous site policies</p>

<b>Prescribed body</b>	<b>Strategic issues that the body has been engaged on</b>	<b>Mechanism and methods of cooperation used</b>	<b>Outcome</b>	<b>Local Plan: strategy and sites policy that has been influenced as a result of the process</b>
		<p>consultation on the review of the Surrey Waste Plan.</p> <p>Surrey County Council represented at meetings of the Guildford Joint Infrastructure Group.</p> <p>Surrey County Council is represented at the LEP's Transport Action Group, on which the Council sits representing the seven borough and district councils in the west of Surrey.</p> <p>Surrey County Council was represented on the Steering Group for the Council's Guildford Town and Approaches Movement Study (GTAMS) in 2013/14.</p> <p>The Council has been represented at various meetings and workshops convened by Surrey County Council including the Surrey</p>	<p>Consultation responses taken into account in preparing the Proposed Submission Local Plan: strategy and sites, Sustainability Appraisal and accompanying evidence base.</p>	

Prescribed body	Strategic issues that the body has been engaged on	Mechanism and methods of cooperation used	Outcome	Local Plan: strategy and sites policy that has been influenced as a result of the process
		<p>Transport Plan: Guildford Borough Draft Local Transport Strategy and Forward Programme, Surrey Congestion Programme, Surrey Rail Strategy, Guildford Cycling Plan and Surrey Infrastructure Plan.</p> <p>Meetings, emails, letters, telephone.</p>		
Hampshire County Council		<p>Consultation at all stages of plan preparation.</p> <p>Hampshire County Council is represented at the LEP's Transport Action Group, on which the Council sits representing the seven borough and district councils in the west of Surrey.</p> <p>Joint working to assess the education needs arising from planned and demographic growth.</p>	<p>Setting the scope for the SA Infrastructure Delivery Plan (chapters 2, 5)</p> <p>Consultation responses taken into account in preparing the Proposed Submission Local Plan: strategy and sites and accompanying evidence base.</p>	<p>Policy ID1: Infrastructure and delivery</p> <p>Policy ID3: Sustainable transport for new developments</p> <p>Appendix C: Infrastructure Schedule</p>

Prescribed body	Strategic issues that the body has been engaged on	Mechanism and methods of cooperation used	Outcome	Local Plan: strategy and sites policy that has been influenced as a result of the process
		Meetings, emails, letters, telephone.		
Waverley Borough Council	<p>Housing need</p> <p>Travellers</p> <p>Employment</p> <p>Transport and infrastructure</p> <p>Thames Basin Heaths Special Protection Area (SPA)</p>	<p>Consultation at all stages of plan preparation, including a targeted consultation on the TAA questionnaire and draft findings.</p> <p>Joint working to assess the housing needs across the HMA.</p> <p>Joint working to identify the Functional Economic Market Area.</p> <p>Joint working – also with Surrey County Council – to assess the traffic impacts of cumulative development in emerging Local Plans for Guildford and Waverley boroughs on the Strategic Road Network and the Local Road Network.</p> <p>Discussions regarding the</p>	<p>Guildford, Waverley and Woking Memorandum of Understanding setting out the strategic planning matters upon which we will cooperate (Appendix 9)</p> <p>Guildford, Waverley and Woking Statement of Common Ground setting out a commitment for ongoing joint working to explore potential ways of meeting housing need in the HMA (Appendix 10)</p> <p>West Surrey FEMA 2016</p> <p>Guildford Borough Proposed Submission Local Plan “June 2016”: Strategic Highway Assessment Report (Surrey CC, June 2016) and a strategic highway assessment report for Waverley borough.</p> <p>Liaison with Waverley Borough</p>	<p>Policy S2: Planning for the borough our spatial development strategy</p> <p>Policy E1: Meeting employment needs</p> <p>Policy ID2: Supporting the Department for Transport’s “Road Investment Strategy”</p> <p>Appendix C: Infrastructure Schedule</p>

<b>Prescribed body</b>	<b>Strategic issues that the body has been engaged on</b>	<b>Mechanism and methods of cooperation used</b>	<b>Outcome</b>	<b>Local Plan: strategy and sites policy that has been influenced as a result of the process</b>
		<p>provision of sufficient SANG to support planned development across LPA boundaries.</p> <p>Waverley Borough Council represented at meetings of the Guildford Joint Infrastructure Group since 2016.</p> <p>Meetings, emails, letters, telephone, including at councillor level.</p>	<p>Council on the cross boundary transport implications arising from development at the Dunsfold Aerodrome site resulting in inclusion of scheme LRN25 in the Appendix C: Infrastructure Schedule.</p> <p>Consultation responses taken into account in preparing the Proposed Submission Local Plan: strategy and sites.</p> <p>Explored two potential SANGs that could be shared across LPA boundaries, including through land assembly and a SANG promoted by a private landowner.</p>	
Woking Borough Council	<p>Housing need</p> <p>Travellers</p> <p>Employment</p> <p>Transport and infrastructure</p>	<p>Consultation at all stages of plan preparation, including a targeted consultation on the TAA questionnaire and draft findings.</p> <p>Joint working to assess the housing needs across the HMA.</p>	<p>Guildford, Waverley and Woking Memorandum of Understanding setting out the strategic planning matters upon which we will cooperate (Appendix 9)</p> <p>Guildford, Waverley and Woking Statement of Common Ground</p>	<p>Policy S2: Planning for the borough our spatial development strategy</p> <p>Policy E1: Meeting employment needs</p> <p>Appendix C: Infrastructure Schedule</p>

<b>Prescribed body</b>	<b>Strategic issues that the body has been engaged on</b>	<b>Mechanism and methods of cooperation used</b>	<b>Outcome</b>	<b>Local Plan: strategy and sites policy that has been influenced as a result of the process</b>
	Thames Basin Heaths Special Protection Area (SPA)	<p>Joint working to identify the Functional Economic Market Area.</p> <p>Discussions regarding the provision of sufficient SANG to support planned development across LPA boundaries.</p> <p>Woking Borough Council represented at meetings of the Guildford Joint Infrastructure Group since 2016.</p> <p>Meetings, emails, letters, telephone, including at councillor level.</p>	<p>setting out a commitment for ongoing joint working to explore potential ways of meeting housing need in the HMA (Appendix 10)</p> <p>West Surrey FEMA 2016</p> <p>Consultation responses taken into account in preparing the Proposed Submission Local Plan: strategy and sites.</p> <p>Explored possibility of sharing spare SANG capacity. Spare capacity was not needed so no agreement was reached.</p>	
Rushmoor Borough Council	<p>Housing need</p> <p>Transport and infrastructure</p> <p>Thames Basin Heaths Special</p>	Consultation at all stages of plan preparation, including a targeted consultation on the TAA questionnaire and draft findings, and the West Surrey Functional Economic Market Area.	<p>Consultation responses taken into account in preparing the Proposed Submission Local Plan: strategy and sites.</p> <p>Catchment based SIMCAT modelling for the River Blackwater in</p>	<p>Policy S2: Planning for the borough our spatial development strategy</p> <p>Policy E1: Meeting employment needs</p> <p>Appendix C: Infrastructure</p>



Prescribed body	Strategic issues that the body has been engaged on	Mechanism and methods of cooperation used	Outcome	Local Plan: strategy and sites policy that has been influenced as a result of the process
	<p>Protection Area (SPA)</p> <p>Water Quality</p>	<p>Workshop to agree West Surrey HMA and SHMA methodology.</p> <p>Rushmoor Borough Council sat representing the borough and district councils in Hampshire on the LEP's Transport Action Group until 2017, on which Guildford Borough Council sits representing the seven borough and district councils in the west of Surrey.</p> <p>Meetings, emails, letters, telephone, including at councillor level.</p> <p>Discussions regarding the provision of sufficient SANG to support planned development across LPA boundaries.</p> <p>Discussions regarding air quality in the Blackwater</p>	<p>the Water Quality Assessment, for discharges of ammonia and phosphate (as described in the Water Quality Assessment); approach agreed with the Environment Agency and consistent with that taken in the joint Hart, Rushmoor and Surrey Heath Water Cycle Study (May 2017)</p> <p>Explored possibility of bringing proposed cross-boundary SANGs online but the project was not deliverable.</p> <p>Letter of support dated August 2016 for Guildford West (Park Barn) rail station.</p> <p>Guildford, Rushmoor and Surrey Heath districts, in partnership with Surrey County Council and Hampshire County Council, are working together to undertake assessment of NO2 exceedance on the A331 Blackwater Valley Road in response to Defra's UK plan for tackling roadside nitrogen dioxide</p>	<p>Schedule</p>

Prescribed body	Strategic issues that the body has been engaged on	Mechanism and methods of cooperation used	Outcome	Local Plan: strategy and sites policy that has been influenced as a result of the process
		Valley.	concentrations (July 2017).	
Surrey Heath Borough Council	<p>Housing need</p> <p>Water Quality</p> <p>Travellers</p> <p>Thames Basin Heaths Special Protection Area (SPA)</p>	<p>Consultation at all stages of plan preparation, including a targeted consultation on the TAA questionnaire and draft findings, and the West Surrey Functional Economic Market Area.</p> <p>Workshop to agree West Surrey HMA and SHMA methodology.</p> <p>Meetings, emails, letters, telephone.</p> <p>Informal discussions via email over potential cross-boundary SANG.</p> <p>Discussions regarding air quality in the Blackwater Valley.</p>	<p>Consultation responses taken into account in preparing the Proposed Submission Local Plan: strategy and sites.</p> <p>TAA questionnaire updated to reflect consultation response.</p> <p>Catchment based SIMCAT modelling for the River Blackwater in the Water Quality Assessment.</p> <p>Explored possibility of creating new cross-boundary SANG, but not possible.</p> <p>Guildford, Rushmoor and Surrey Heath districts, in partnership with Surrey County Council and Hampshire County Council, are working together to undertake assessment of NO2 exceedance on the A331 Blackwater Valley Road in response to Defra's UK plan for tackling roadside nitrogen dioxide concentrations (July 2017).</p>	<p>Policy S2: Planning for the borough our spatial development strategy</p> <p>Policy E1: Meeting employment needs</p>

<b>Prescribed body</b>	<b>Strategic issues that the body has been engaged on</b>	<b>Mechanism and methods of cooperation used</b>	<b>Outcome</b>	<b>Local Plan: strategy and sites policy that has been influenced as a result of the process</b>
Elmbridge Borough Council	Travellers  Thames Basin Heaths Special Protection Area	<p>Consultation at all stages of plan preparation, including a targeted consultation on the TAA questionnaire and draft findings, and the West Surrey FEMA.</p> <p>Workshop to agree West Surrey HMA and SHMA methodology.</p> <p>Meetings, emails, letters, telephone.</p> <p>Discussion over potential upgrades to A3/M25 interchange and impacts on SPA and buffer zones.</p>	<p>Consultation responses taken into account in preparing the Proposed Submission Local Plan: strategy and sites</p> <p>TAA questionnaire updated to reflect consultation response.</p>	<p>Policy S2: Planning for the borough our spatial development strategy</p> <p>Policy E1: Meeting employment needs</p> <p>Appendix C: Infrastructure Schedule</p>
Mole Valley District Council	Travellers	<p>Consultation at all stages of plan preparation, including a targeted consultation on the TAA questionnaire and draft findings, and the West Surrey FEMA</p> <p>Workshop to agree West</p>	<p>Consultation responses taken into account in preparing the Proposed Submission Local Plan: strategy and sites</p>	<p>Policy P2: Green Belt</p>

<b>Prescribed body</b>	<b>Strategic issues that the body has been engaged on</b>	<b>Mechanism and methods of cooperation used</b>	<b>Outcome</b>	<b>Local Plan: strategy and sites policy that has been influenced as a result of the process</b>
		Surrey HMA and SHMA methodology  Meetings, emails, letters, telephone		

## Appendix 5: Regulation 19 representations from prescribed bodies

Organisation	Relevant duty to cooperate representations	GBC response
Environment Agency (2016)	<p><b>Water Quality</b></p> <p>There is no evidence relating to environmental capacity and water quality and the impact of the growth being proposed in terms of the sewerage infrastructure needs and the impact of Water Framework Directive (WFD) objectives. Without this evidence the Plan is not based on robust evidence or consistent with national planning policy and is unsound.</p>	<p>A Water Quality Assessment (WQA) has subsequently been prepared, in consultation with the EA and Thames Water Utilities Ltd (TWUL). The EA submitted comments on this in an email dated 16 June 2017 to AECOM as part of its response to the Proposed Submission Local Plan (2017) consultation. TWUL submitted comments by email on 15 June 2017.</p> <p>Sections 6.4.1 and 6.4.2 of the final version of the WQA take account of both of the consultees' recommendations in relation to ensuring environmental capacity of existing sewer networks to accommodate the housing growth proposed in the Plan by advising that developers seek confirmation with Thames Water Utilities Ltd (TWUL) over Wastewater Treatment Works (WWtW) treatment capacity.</p> <p>In addition, all site allocations in the Submission Local Plan that feed into the Ash Vale sewage treatment works now include the following requirement as part of the allocation policy:</p> <p><i>“Ensure that sufficient capacity is available within Ash Vale wastewater treatment works to accept wastewater from this development within its permitted limits”.</i></p> <p>This additional requirement necessitates that developers liaise with Thames Water to ensure that adequate capacity will be available to accommodate new</p>

Organisation	Relevant duty to cooperate representations	GBC response
		<p>proposed development.</p> <p>Furthermore, the Council has addressed the capacity issue in a proposed minor modification to policy ID1 of the Plan (see below under the response to comments on that policy).</p> <p>A combination of SIMCAT and RQP modelling has been used in the WQA, which is accordance with the EA's recommended approach to modelling the impacts of growth on water quality. The EA's email stated that "it is encouraging to see that a catchment based model has been used (SIMCAT) as we typically recommend this is used".</p> <p>The EA's response recommended that the WQA should – ideally – assess cumulative impacts on the River Blackwater by means of a calculation of impacts along the continuum of the river. AECOM have advised us that this would entail a collaborative review with other authorities of discharges to the river at each point where there are permit conditions, and a modelling exercise to determine how to optimise these discharges. They have stated that this is beyond what an individual study for one authority can achieve; it would instead require a large joint study with Rushmoor, Hart, Surrey Heath, Bracknell Forest &amp; Wokingham Councils and/or the EA to undertake the modelling review with Thames Water and the Council's support. Our WQA, in combination with the joint Hart, Rushmoor and Surrey Heath Water Cycle Study (May 2017), show that each individual</p>

Organisation	Relevant duty to cooperate representations	GBC response
		<p>WwTW can be improved to have permit conditions that allow water quality targets to be met.</p> <p>Completion of a robust WQA, as described and in accordance with EA guidance and national planning policy guidance nevertheless satisfies this part of the EA's and Thames Water's representations on the Plan.</p> <p><b>Comments made by Thames Water:</b></p> <p>In addition to their comment on ensuring environmental capacity of existing sewer networks to accommodate the growth proposed in the plan (see above), Thames Water commented that the report incorrectly stated that it is not acceptable to allow a deterioration from 'High' to 'Good' water quality status. This incorrect reference was deleted in the final version of the WQA. Section 4.3 of the final WQA also takes account of the Weser Ruling by incorporating new wording stating that: <i>"if a waterbody's overall status is less than Good as a result of another element, it is not acceptable to justify a deterioration in another element because the status of a waterbody is already less than Good."</i></p> <p>TW also commented that they felt the WQA did not address the italicised text from the following objective: "provide a strategy for wastewater treatment across the Borough which determines what solutions to wastewater treatment are required and <i>whether or not the solutions are viable in terms of balancing environmental capacity with cost</i>,".</p>

Organisation	Relevant duty to cooperate representations	GBC response
		<p>The WQA does address this objective, as it shows that permit conditions to achieve required water quality standards are achievable within the context of conventional treatment – it is up to the sewerage undertaker to determine what treatment solutions are required (and when) to meet those permit conditions, and the cost-benefit of these solutions. It is not reasonable to ask local authorities to fund this level of assessment for the sewerage undertaker’s operational needs.</p>
Environment Agency (2016)	<p><b>Sequential Test</b> Flood risk sequential and exception tests have not been appropriately applied to justify the conclusions drawn in the Plan. Further justification, explanation and clarification sought.</p>	<p>There were a number of formatting errors in the SFRA Level 1 Flood Risk Sequential and Exception Test that have been corrected in the submission version of the document. Further wording has also been added to the methodology and other parts of the document have also been amended in order to make the assessment process easier to follow.</p>
Environment Agency (2016)	<p><b>Policy P4</b> Support the inclusion of a specific policy for flood risk, the protection of groundwater, and policy wording on the distinction between developed and undeveloped flood zone 3b</p> <p>We do not consider that sufficient reference has been made to the impacts of climate change on the flood risks associated with development.</p> <p>We recommend that in accordance with the paragraph 99 of the NPPF Policy P4 can be re-worded to reference climate change. For</p>	<p>Noted.</p> <p>Wording amended to read: (c) a site-specific flood risk assessment demonstrates</p>



Organisation	Relevant duty to cooperate representations	GBC response
	<p>instance:  c) a site-specific flood risk assessment demonstrates that the development will be safe for its lifetime, taking into account climate change, including access and egress, without increasing flooding elsewhere, and where possible, will reduce flood risk overall</p> <p>In the interests of accuracy and clarity we recommend that this Policy is retitled to reflect the correct terminology:  Policy P4 – Flooding, flood risk and groundwater protection zones</p> <p>In the interest of accuracy and completeness we suggest that the following is added to the end of Paragraph 4.3.39:  All other land surrounding this is important flow routes and should be retained.</p> <p>In the interest of accuracy and clarity we suggest that the following is added to the details regarding development in areas at risk of flooding in Policy P4:  f) site drainage systems are appropriately designed taking into account of storm events up to 1 in 100 year chance of flooding with an appropriate allowance for climate change allowance.</p> <p>While Policy P4 makes reference to the protection of Groundwater Source Protection Zones, however, in-line with paragraph 109 of the NPPF in the interests of accuracy and clarity we suggest the following wording:  Development within Groundwater Source Protection Zones and Principal Aquifers will only be permitted provided that it has no adverse impact on the quality of the groundwater resource and does not put at risk the ability to maintain a public water supply.</p>	<p>that the development, including the access and egress, will be safe for its lifetime, taking into account climate change, without increasing flooding elsewhere, and where possible, will reduce flood risk overall</p> <p>Policy title amended as suggested.</p> <p>Wording amended to read:  Land in undeveloped flood zone 3b forms important flow routes. Any changes to these flow routes should be considered as part of a Flood Risk Assessment.</p> <p>Wording amended to read:  (f) site drainage systems are appropriately designed taking account of storm events, and flood risk of up to 1 in 100 year chance, with an appropriate allowance for climate change.</p> <p>Wording amended as suggested.</p>

Organisation	Relevant duty to cooperate representations	GBC response
Environment Agency (2016)	<p><b>Policy ID4</b> Welcome and support this policy and specifically the commitment to protect and enhance waterways. Welcome and would like to be involved in the production of a separate Development Management Policy (DMP) and a Green and Blue Infrastructure Supplementary Planning Document (SPD) to set out how ecological networks will be managed and enhanced.</p> <p>Monitoring Indicators Table – In the interests of clarity and accuracy we note that progress on WFD objectives will be reported by the Environment Agency, not Natural England.</p>	<p>Noted.</p> <p>Monitoring Indicators Table amended accordingly.</p>
Environment Agency (2016)	<p><b>Site allocations</b> At present the Plan is unsound as the evidence is not in place to demonstrate that these safe access and egress can be provided to these sites:</p> <ul style="list-style-type: none"> <li>• Policy A5: Jewsons, Walnut Close, Guildford</li> <li>• Policy A13: Kernal Court, Walnut Close, Guildford</li> <li>• Policy A14: Wey Corner, Walnut Close, Guildford</li> </ul>	<p>This has been addressed in an update (addendum) to the Level 2 SFRA. This update provides evidence of safe access and egress to these sites and responds to the concerns raised by the EA.</p>
Environment Agency (2017)	<p><b>Policy P4</b> We welcome the inclusion of a majority of the advice we provided in July 2016.</p> <p>Policy P4 does not reflect some of the conclusions within the evidence submitted in the Strategic Flood Risk Assessment (SFRA) Level 1. In order to overcome this point of soundness we recommend that Policy P4 (3) is updated to reflect your SFRA: “Development proposals in the ‘developed’ flood zone 3b will also only be approved where the footprint of the proposed building(s) is not greater than that of the existing building(s) and there will be no</p>	<p>Noted.</p> <p>To address the first point, the Level 1 SFRA does state that there should be no intensification in use on developed sites in the Functional Floodplain (flood zone 3b); however, this statement does not reflect national guidance and therefore appears to be incorrect.</p> <p>We feel that a reference to development vulnerability</p>

Organisation	Relevant duty to cooperate representations	GBC response
	<p><u>increase in development vulnerability or intensification in use.</u> Proposals within these areas should facilitate greater floodwater storage.</p> <p>Paragraph 4.3.36 Recommend adding the date of the Flood and Water Management Act (2010) and making specific mention of Thames Water as a Risk Management Authority, as they have a significant role in relation to managing flood risk from sewers.</p> <p>Paragraph 4.3.42 We welcome the recognition of sensitive groundwater receptors within the Borough. We recommend that reference is made to the most up-to-date version of the Environment Agency's groundwater protection position statements.</p>	<p>would adequately cover this issue. This is because if a developer were to submit a proposal for higher density redevelopment in flood zone 3b that does not exceed the existing building's footprint, then their planning application would still need to demonstrate that the proposal would not increase flood risk vulnerability on the site or surrounding area. This is necessary in order to meet the other requirements of policy P4.</p> <p>Therefore, we have included additional wording to Policy P4 as a Minor Modification to include the first part of the respondent's suggested underlined wording to policy P4, but not to refer to intensification in use.</p> <p>Additional wording to paragraph 4.3.36 included as a proposed Minor Modification.</p> <p>Additional wording to paragraph 4.3.42 included as a proposed Minor Modification.</p>
Environment Agency (2017)	<p><b>Policy ID1</b> The policy may benefit from incorporating some of the recommendations that came from the Water Quality Assessment (WQA) undertaken by AECOM.</p>	<p>Additional wording is proposed as a Minor Modification to address comments in relation to this by both the EA and Thames Water: Through the planning system, the Council is able to</p>

Organisation	Relevant duty to cooperate representations	GBC response
	<p>For major developments in the Guildford, Ripley, and Ash Vale Sewage Treatment Works (STW) catchments it is recommended that the council embeds a development control policy within the local plan. This could require developers to provide evidence that they have consulted the sewer undertaker regarding capacity of the sewer network. Drainage strategies should also be submitted as part of the application to enable the sewer undertaker and the Environment Agency to fully assess the potential impacts on the sewer network. Developments should not be occupied before capacity of the sewer network to accommodate flows and capacity at the works is in place to treat to the required standard. For cases where capacity is not in place, the council could include wording in the policy on Grampian conditions.</p>	<p>ensure that there is adequate infrastructure in place to support new development. For instance, where applicable, developers will be required to demonstrate that there is adequate waste water capacity and surface water drainage both on and off the site to serve the development and that it would not lead to problems for existing or new users. Where there is an infrastructure capacity constraint, the Council will require the developer to set out what appropriate improvements are necessary and how they will be delivered and may use the planning system to ensure timely provision (e.g. the though the imposition of Grampian-style conditions or appropriate phasing).</p>
<p>Environment Agency (2017)</p>	<p><b>Policy ID4</b>  We welcome and support the recognition of the differences between green and blue infrastructure. We recommend that use of the word “waterways” is changed to “watercourses”.</p> <p>We welcome the reference to the Water Framework Directive in paragraph 4.6.40. However, we recommend that the following wording is used for the first sentence in this paragraph:  “The Water Framework Directive (WFD) requires all member states to achieve good ecological and good chemical status for all groundwater and surface water waterbodies by 2027 at the latest.”</p> <p>In policy point (6) we recommend that mention of about non-native invasive species. Developments can result in the spread of non-native invasive species which have devastating ecological and economic impacts. Where identified, these species should be eradicated/controlled under an agreed scheme.</p>	<p>Amended wording included as a proposed Minor Modification.</p> <p>Additional wording included as a proposed Minor Modification.</p> <p>Detailed policies that identify specific issues, projects and measures would more appropriately be dealt with in the Local Plan Development Management policies. ID4 is a strategic policy that deals with the overall treatment of the borough’s waterways.</p>

Organisation	Relevant duty to cooperate representations	GBC response
	<p>In policy point (7) we recommend that the second sentence is replaced with: “Development proposals that are likely to have an adverse impact on the functions and setting of any watercourse and its associated corridor will not be permitted. Development should seek to conserve and enhance the ecological, landscape and recreational value of the watercourse and its associated corridor through good design and seeking out opportunities to deliver WFD objectives.”</p> <p>This policy should identify potential opportunities for aligning with Water Framework Directive (WFD) objectives and consider the pressures and aims outlined in the River Basin Management Plan (RBMP). For instance, many of the actions that have been highlighted to bring the River Wey into good ecological status involve re-naturalising the bank by removing hard engineering, encouraging natural buffer zones to the watercourse, removing barriers to fish and eel passage, reducing diffuse pollution and tackling non-native invasive species. Some WFD objectives can only be delivered via catchment wide/cross-boundary planning which the Wey Landscape Partnership (currently hosted by the Surrey Wildlife Trust) was set up to achieve - please see comment above on working in partnership and the Wey Habitat Restoration Strategy.</p> <p>2.2.4 Buffer zone Paragraph 4.6.48 to a buffer zone for non-navigable rivers. Please note that <b>all rivers</b> (navigable or not) should be protected and enhanced by an 8m wide minimum undeveloped buffer zone (measured from bank top) on both sides of the river. Bank top is defined as the point at which the bank meets the level of the surrounding land. 8m is the minimum required for main rivers under the Thames Region land drainage byelaws.</p>	<p>Additional text included as a proposed Minor Modification as follows: “On greenfield sites where more land is available, a wider buffer zone of a minimum of 10m on both sides of the watercourse that varies in size and shape as appropriate to include larger areas is required. The provision of buffer zones should be supported by a long</p>

Organisation	Relevant duty to cooperate representations	GBC response
	<p>However, on a greenfield site where there is plenty of land available, we would expect to see a wider buffer zone of a minimum of 10m on both sides of the watercourse that varies in size and shape to include larger areas. It may be appropriate to look at a much larger buffer on certain sites but this should be assessed on a site by site basis. The provision of a buffer zone should also be supported by a long term ecological management plan.</p> <p>2.2.5 Key evidence Add WQA, the Water Framework Directive and Thames River Basin Management Plan as key evidence.</p>	<p>term ecological management plan.”</p> <p>Additional evidence base included as a proposed Minor Modification.</p>
Environment Agency (2017)	<p><b>Site allocations</b> Recommend that groundwater issues are added to the list of key considerations for a number of sites</p>	<p>Additional text included as a proposed Minor Modification – this includes a reference to the issues highlighted in the EA’s representation for each site where groundwater issues (e.g. SPZ or Principal Aquifer) apply.</p>
Environment Agency (2017)	<p><b>Policy A6: North Street redevelopment, Guildford</b> Requirement (13) states: ‘Avoid development of high or medium vulnerability uses in flood zone 2 (medium risk) and flood zone 3 (high risk)’. This should read ‘more or highly vulnerable uses’.</p>	<p>Amended wording included as a proposed Minor Modification as recommended.</p>
Environment Agency (2017)	<p><b>SFRA</b> The majority of allocated sites have detailed modelling where the 1 in 1000 year (0.1% annual exceedance probability) is available, these sites have been assessed against the 1 in 1000 year flood. For the purpose of accuracy and clarity we recommend that the approach of using the 1 in 1000 year flood event to account for climate change is</p>	<p>The Council has prepared an addendum to update the May 2016 Level 2 SFRA. The addendum clearly sets out the approach by which the SFRA took account of climate change, which was in line with Planning Practice Guidance on Flood Risk and Coastal Change, published</p>

Organisation	Relevant duty to cooperate representations	GBC response
	clearly set out in the SFRA Level 2.	March 2014. The addendum also includes a recommendation that potential applicants consult the more recently published climate change guidance before submitting a proposal if a site is liable to be affected and to provide evidence that they have done so in a site-specific flood risk assessment. The site allocations policies support this advice by referring to the need for applicants to have regard to the recommendations of the Level 2 SFRA.
Enterprise M3 Local Enterprise Partnership (2016)	<p><b>Vision and ambition</b></p> <p>The Strategic Economic Plan recognises the importance of Guildford, identifying it as one of only four major 'Growth Towns' in the Enterprise M3 area, whose continued economic performance is critical to the local and wider economy. Enterprise M3 has worked closely with Guildford Borough Council throughout the development of the emerging Local Plan, both on the development of the Plan and its evidence base and how the Local Growth Fund can be used to support growth across the Borough.</p> <p>Enterprise M3 welcomes the overall vision set out in The Proposed Submission Local Plan and is committed to working with Guildford Borough Council and partners to achieve its vision during the plan period. Whilst our consultation response highlights key aspects that we feel require further consideration, we are on the whole content with the strategy set out within the document for delivering growth within Guildford up until 2033. Guildford Borough Council has worked closely with Enterprise M3 since the LEP's inception in 2011 and is one of our key Growth Towns, as set out in our Strategic Economic Plan, 2014. Enterprise M3 wishes to continue to work collaboratively with partners at Guildford Borough Council as the Local Plan process</p>	Noted.

Organisation	Relevant duty to cooperate representations	GBC response
	continues and once adopted to facilitate its delivery.	
Enterprise M3 Local Enterprise Partnership (2016)	<p><b>New homes</b> The Proposed Submission Local Plan provides for the delivery of 13,860 new homes between 2013 – 2033 in Policy S2, which equates to an average of 693 dwellings per annum during the Plan period. This is a welcome increase in housing provision since the previous consultation on Guildford's draft Local Plan in 2014 and we note that this higher target is in line with the conclusions of the West Surrey Strategic Housing Market Assessment, 2015.</p> <p>Whilst we are supportive of this policy, we note that the table showing Guildford's Annual Housing Target in Policy S2 and the housing numbers within this do not total up to the 13,860 dwellings to be provided for. We would recommend that for consistency with the principle of the policy that this be amended to reflect the total housing numbers to be provided for during the plan period.</p> <p>Enterprise M3 is pleased to see that the Plan reflects the objectively assessed need across the Borough and that it is proposing a level of housing development which can support the continued economic growth of the town. Enterprise M3 is therefore supportive of the increased housing target from 652 to 693 dwellings per annum during the Plan period.</p> <p>Enterprise M3 notes that within Guildford Borough Council's Annual Monitoring Report (AMR), 2015 there is currently 2.4 years supply against an identified housing need of 693 homes per annum (taking into account completions since 2013, a buffer and accrued deficit). Taking into consideration pending planning applications in both Ash and Tongham supply increases to 2.5 years, however the AMR</p>	<p>Noted.</p> <p>To aid clarity an amended table is included as a proposed Minor Modification.</p> <p>Noted.</p>



Organisation	Relevant duty to cooperate representations	GBC response
	<p>recognises that this addition is not certain.</p> <p>Whilst Enterprise M3 is very supportive of the increased housing delivery target, we would like to emphasise the importance of accelerating housing delivery and ensuring that housing targets remain deliverable. This should be outlined within Guildford's Housing Strategy for the duration of the Plan period (2013-2033). At the moment this Strategy only appears to cover the period 2015-2020. Enterprise M3 would welcome the opportunity to work with Guildford Borough Council to ensure that the increased housing target is deliverable. Enterprise M3 also notes the phased approach to housing delivery in Policy S2 but would encourage Guildford Borough Council to focus on early delivery in order to meet demand, particularly focusing on the large scale strategic housing sites.</p> <p>Housing affordability is a key issue across the Enterprise M3 LEP area, particularly in Guildford. The Proposed Submission Local Plan highlights that the affordability ratio in Guildford was 10.92 in 2013, higher than Surrey's ratio of 10.89 and much greater than England's ratio of 6.451. Guildford was also highlighted in Enterprise M3's Housing Evidence Study, 2014 as the second most expensive district for people wishing to buy market housing.</p> <p>Enterprise M3 is therefore supportive of policy H2, which provides for 40% affordable housing to be accommodated on sites of five or more homes, or in excess of 0.17ha in size. However, there is the potential for this level of affordable housing provision to render some sites unviable, especially in difficult market conditions which may be exacerbated by the Brexit result. We are therefore supportive of paragraph 4.2.40 of the Plan which makes reference to the Council following a cascade mechanism to assist in the delivery of housing</p>	<p>The support for large scale strategic sites is noted. The timing of delivery of these sites is dependent upon the delivery of key infrastructure. Consequently there is a limit on the number of units that can be delivered prior to the delivery of the infrastructure, however we are working with relevant partners to secure their delivery. We have sought to maximise smaller, less dependent sites that can deliver early however, given the scale of accrued deficit at the point of adoption, it is still necessary to adopt a phased rate of delivery that increase over time.</p> <p>Noted. Whilst paragraph 4.2.20 no longer refers to the cascade, the mechanisms available to improve viability remain.</p>

Organisation	Relevant duty to cooperate representations	GBC response
	<p>schemes should viability become an issue during the development process.</p> <p>Enterprise M3 also welcomes the proposal within policy H2, which makes reference to Guildford Borough Council providing and managing affordable homes themselves, as well as reference in section 4.2.12 to the allocation of self build plots within strategic housing development sites to help meet demand for new housing and increase supply. This provides for flexibility in delivering new homes where they are needed most and will encourage diversity within the housing market.</p>	<p>Noted. The Reasoned Justification for self-build and custom housebuilding has been expanded at paragraph 4.2.27a onwards.</p>
<p>Enterprise M3 Local Enterprise Partnership (2016)</p>	<p><b>Employment</b></p> <p>The Enterprise M3 Commercial Property Market Study, 2016 highlights that Guildford is a highly sought after office location. Its highly skilled labour, market and transport connections to London mean that office development attracts some of the highest rental values in the LEP area and that speculative office development is therefore commercially viable. Future developments, such as the planned expansion of the University of Surrey will further enhance the appeal of Guildford as a location for inward investment.</p> <p>The Commercial Property Market Study, 2016 highlights that the challenge facing Guildford is that it has a major shortage of office space within the town centre and a very limited pipeline of sites. The few vacant sites in the town centre are also under growing pressure to be converted to residential uses. It therefore follows that Enterprise M3 is therefore very supportive of employment allocations for quality, grade A office space within Guildford town centre which meets this demand.</p>	<p>Noted.</p> <p>Noted.</p>

Organisation	Relevant duty to cooperate representations	GBC response
	<p>Although within the Proposed Submission Local Plan we have noted that there are a limited number of allocations for employment development within the town centre, Enterprise M3 is supportive of the Draft Guildford Town Centre Masterplan, 2015 and look forward to seeing the proposals and working with Guildford Borough Council to bring it forward. In particular, the ability of the Bedford Wharf area to provide much needed employment space within the town centre would be very much welcomed.</p> <p>Nevertheless, given the recognised shortage of office space within the town centre we encourage further consideration to be given to ensuring that there is sufficient land allocated for quality office development within the town centre in order to prevent the loss of existing and new major users in the future finding no suitable land in Guildford and subsequently locating elsewhere to the economic detriment of the wider Enterprise M3 area.</p> <p>Enterprise M3 is very supportive of policy E4, which makes provision for a 10 ha extension to Surrey Research Park. This is one of the Borough's largest employment areas and a centre of excellence in technology, science health and engineering. This extension is expected to provide up to 35,000 sq m of additional office and R&amp;D floor space, which added to the remaining 9,000 sq m provides a significant amount of employment space for research, development and design activities that are complementary to those activities undertaken at the University of Surrey. This extension will ensure the continued growth and success of the Research Park and the businesses within it, which aligns strongly within our ambitions for innovation and enterprise across the Enterprise M3 LEP area, particularly around the development of 5G technology for which the University of Surrey is playing a key part.</p>	<p>The Town Centre Masterplan was an aspirational document and not necessarily deliverable. It did not treat issues such as flooding, ownership and leases as constraints. Further work is being undertaken to help progress and deliver appropriate town centre sites by the Major Projects team in the Council. These are identified in the Council's Town Centre Regeneration Strategy (2017).</p> <p>As set out in Policy E2 of the Proposed Submission Local Plan, the town centre remains the preferred location for use class B1a and B1b floorspace. However, there is a lack of available sites in the town centre being brought forward for this type of development.</p> <p>Noted.</p>

Organisation	Relevant duty to cooperate representations	GBC response
	<p>The Commercial Property Market Study, 2016 also highlights that demand for industrial sites in Guildford has been strong, evidenced by the take up and development at Henley Business Park. Since 2013 the business park has achieved one pre-let and is also speculatively building out two units, with only 6,000 sq m of development space remaining.</p> <p>However, the Commercial Property Market Study, 2016 recognises that there remains a persistent shortage of both available industrial space and land with development potential in most market areas within the LEP. This includes light industrial space which is suitable for SMEs, but particularly for large scale warehousing which could attract new investment to the LEP area in light of recent upwards trends in e-commerce. This undersupply of B8 space transcends LEP boundaries, with very strong demand evident for any sites that can serve the London market. We would therefore encourage further consideration to be given in planning for storage &amp; distribution employment space to meet the needs of the warehousing/logistics sector in the South East, a region which has been recognised as experiencing a particular shortage.</p> <p>Policy E1 makes reference to the need to plan for between 4.7ha and 5.3ha of industrial land (B1c, B2, and B8 uses) within Guildford during the plan period 2013 - 2033. From looking through the Site Allocations section of the Proposed Submission Local Plan, the majority of this requirement for industrial land can be met through the development of the Slyfield Regeneration Area (Allocation A24), a 40 ha site allocated for light industrial uses as well as 1,000 homes, 4 traveller pitches, a new waste management depot and sewage treatment works and community facilities. A further 7,000 sq m of</p>	<p>Noted.</p> <p>The plan recognises the difficulty in identifying sufficient industrial land. Part of the justification for moving the industrial allocation from A43 to A58 is that A58 includes additional land that may be brought forward for industrial floorspace should the need be identified through subsequent updates to the Employment Land Needs Assessment (ELNA).</p>

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	<p>land for industrial and storage &amp; distribution uses can also be accommodated at Garlick's Arch, Send Marsh/Burnt Common and Ripley (Allocation A43) and as aforementioned, 6,000 sq m of development space for storage &amp; distribution uses also remains at Henley Business Park. This indicates that there is enough supply to meet the requirements for industrial development as set out in Guildford's Employment Lands Needs Assessment, 2015 and we are supportive of this approach.</p>	
<p>Enterprise M3 Local Enterprise Partnership (2016)</p>	<p><b>Transport</b> The Local Plan rightly highlights the pivotal role the provision of transport infrastructure will have to play in the successful delivery of the policies contained within it. Transport issues act as a major constraint, holding back Guildford's ability to maintain and build its existing economy, which in turn can deter further investment. In particular excessive congestion and poor accessibility to the town centre and key employment sites such as the Surrey Research Park act as a constraint on growth. The Local Plan represents a key opportunity to formulate a coherent plan to ensure that growth can be delivered and sustained across Guildford. It needs to be flexible enough to enable the strategically focused programmes developed by key stakeholders such as the LEP, Surrey County Council, Highways England, Network Rail and the University of Surrey to create accessibility and infrastructure improvements, which will unlock development opportunities, increase housing supply and improve the capacity of Guildford to generate wealth and high quality jobs.</p> <p>Enterprise M3 therefore welcomes the Strategic Objective 12 to facilitate the timely provision of necessary infrastructure to support sustainable development, together with the commitment given</p>	<p>Noted. We are continuing to work with all major stakeholders to ensure that the planned growth is deliverable.</p> <p>Noted.</p>

Organisation	Relevant duty to cooperate representations	GBC response
	<p>through Policy ID1 towards the delivery of infrastructure. This commitment demonstrates the importance of working with partners to ensure a programme of infrastructure provision for the Borough is delivered both within and beyond the Plan period.</p> <p>Similarly we welcome Policy I2: Supporting the Department for Transport’s “Road Investment Strategy”. We note in particular that it is considered that the delivery of some housing targets is dependent upon major improvement to the A3 through Guildford. Enterprise M3 LEP will continue to work closely with partners and continue to put pressure on Government to deliver the infrastructure that is needed to unlock and support the development of key housing sites and would expect Guildford Borough to play an active role in this engagement with government.</p> <p>Enterprise M3 welcomes the strong emphasis throughout the plan on the benefits of investment in sustainable transport and the recognition that such investment can contribute significantly to economic growth. We are therefore supportive of Policy I3 related to sustainable transport.</p>	<p>Noted.</p> <p>Noted.</p>
Enterprise M3 Local Enterprise Partnership (2017)	Enterprise M3 has reviewed the changes made to the Proposed Submission Local Plan and has no further comments to make at this stage.	Noted.
Highways England (July 2016 and October 2016)	See below.	It should be noted that the ‘issues and concerns’ raised by Highways England in its letter dated 18 July 2016 have been superseded by Highways England’s subsequent letter dated 5 October 2016, which followed

Organisation	Relevant duty to cooperate representations	GBC response
		<p>a meeting on 1 September 2016. In its letter of 5 October 2016, Highways England, referring to its letter dated 18 July 2016, stated that ‘...we have undertaken a review of our response; this letter superseded Highways England’s position in terms of representations.’ (p.1).</p> <p>A review of the letter dated 5 October 2016 is also set out below, following the review of the letter dated 18 July 2016.</p>
<p>Highways England (July 2016)</p>	<p>‘Highways England has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. In this case Highways England’s interests relate to the potential impact of development on the A3 and M25.</p> <p>Overall, in accordance with national policy, we look to GBC to promote strategies, policies and land allocations which will support alternatives to the car and the operation of a safe and reliable transport network. We would be concerned if any material increase in traffic were to occur on the SRN as a result of planned growth within Guildford without careful consideration of mitigation measures. It is important that the Local Plan provides the planning policy framework to ensure development cannot progress without the appropriate infrastructure in place.</p>	<p>Noted.</p> <p>The Council’s spatial development strategy addresses the development needs of the borough and where that development should be focused, actively managing patterns of growth to make the fullest possible use of public transport, walking and cycling, and focusing significant development in locations which are or can be made sustainable. The promotion of sustainable transport has been a key consideration in setting the spatial development strategy.</p>

Organisation	Relevant duty to cooperate representations	GBC response
	<p>When considering proposals for growth, any impacts on the SRN will need to be identified and mitigated as far as reasonably possible. We will support a local authority proposal that considers sustainable measures which manage down demand and reduce the need to travel. Infrastructure improvements on the SRN should only be considered as a last resort. Proposed new growth will need to be considered in the context of the cumulative impact from already proposed development on the A3. It is recognised in the Local Plan that to ensure that planned proposals are viable, improvements to the A3 will be required.'</p>	<p>Travel plan and demand management measures have been explored through the Local Plan-making process and applied to minimise the vehicular trip generation from sites in the Submission Local Plan.</p> <p>The NPPF states that 'The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel' (paragraph 29). The Draft Local Plan seeks to achieve a modest modal shift over the period to 2034, within the context of an absolute increase in traffic volumes, the latter to be accommodated by schemes to increase highway capacity and improve road safety. This is set out in the new text in paragraph 4.6.28 of the Draft Local Plan 2017.</p> <p>The transport evidence base includes the following studies:</p> <ul style="list-style-type: none"> <li>- Guildford Borough Proposed Submission Local Plan "June 2016": Strategic Highway Assessment Report (Surrey CC, June 2016) (hereafter the SHAR 2016) and its addendum (Guildford BC, June 2017)</li> <li>- Study of performance of A3 trunk road interchanges in Guildford urban area to 2024 under development scenarios (Mott MacDonald, December 2017).</li> </ul> <p>The SHAR 2016 represents a robust "worst case" in terms of transport demand and supply assumptions, as it does not assess and therefore does not account for the</p>



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		<p>mitigation; including the potential for modal shift, and the new and improved sustainable transport choices provided by the rail, bus and active modes schemes included in the Draft Local Plan 2016 and makes no allowance for any internalisation of trips within the larger sites.</p> <p>The total mileage and the total number of vehicle hours travelled on the borough's highway networks is forecast to increase, with or without a Submission Local Plan. For instance, based on the SHAR 2016 models, even with no future development in Guildford borough, total mileage will increase by 12 per cent between 2009 and 2031 in the average morning peak hour, driven by development elsewhere and changes in demographic profile and car ownership.</p> <p>In 2031, with the Draft Local Plan 2016, there is a 2 per cent increase in the average morning peak hour and a 2 per cent decrease in the average evening peak hour in the average speed of vehicles on the borough's highway network, compared to a theoretical future in which there is no development and are no new highway schemes in Guildford borough.</p> <p>The SHAR 2016 concludes that "The results show that for Scenario 5, which represents the quantum and distribution of development proposed in the Proposed Submission Local Plan together with the key highway schemes, there will not be a severe impact on the local and strategic highway network" (p.62). The addendum to</p>

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		<p>the SHAR 2016 (Guildford BC, June 2017) found that this conclusion was “not considered likely to change” as a result of the key changes made to proposed site policies and to the programme of transport schemes in the Draft Local Plan 2017.</p>
<p>Highways England (July 2016)</p>	<p><b>‘Spatial Vision and Policy I2: Supporting the Department for Transport's "Road Investment Strategy"'</b></p> <p>The Vision states that <i>“the Department for Transport's Road Investment Strategy (RIS) includes schemes for the A3 Guildford and the M25 Junction 10/A3 Wisley interchange. Early, targeted improvement schemes to deliver road safety and some congestion relief on the A3 in Guildford will be delivered within the plan period. The delivery of housing in the later stages of the plan period is dependent upon major improvement to the A3 through Guildford”</i>.</p> <p>Paragraph 4.6.16 of the Local Plan (Policy 12 Chapter) states that <i>“the implementation of the three RIS schemes during the Plan period, alongside other critical infrastructure, is required in order to be able to accommodate future planned growth both outside and within the borough.”</i></p> <p>In 2014, the Government announced the Road Investment Strategy (RIS) which included the investigation of improvements for the A31 capable of being delivered in the second Roads Period (2020-25) (RP2). The options to be investigated will include the feasibility of proposals for improving the existing A3 through Guildford from the A320 to the Hogs Back junction with the A31, along with associated safety improvements. The design of a scheme at Guildford is complex and needs to consider a number of potential options, a</p>	<p>Following a meeting on 1 September 2016 to explain and clarify the approach taken to this matter in the Draft Local Plan 2016, Highways England, in a letter dated 5 October 2016, withdrew its previous representation of 18 July 2016 with respect to this policy as follows:</p> <p>‘We support Guildford’s commitment to work with Highways England to develop improvements to the A3 and M25. It is noted from the Local Plan, the implementation of the three RIS schemes during the plan period is required in order to be able to accommodate planned growth.</p> <p>Highways England is committed to commence construction of two RIS1 schemes during roads period 1, namely M25 Junction 10/A3 Wisley Interchange and M25 Junction 10 – 16. Work is ongoing on a number of options but there is not a detailed design available at this time. ...</p> <p>You will be aware that Highways England is currently developing options for a potential scheme on the A3 in</p>

Organisation	Relevant duty to cooperate representations	GBC response
	<p>process which takes time to complete, including significant transport modelling of options. A scheme would be for planned for delivery to commence towards end of the RP2, subject to ensuring it continues to demonstrate value for money. The scheme will be managed by Highways England working closely with Guildford Borough Council and Surrey County Council, particularly when assessing interaction with the adjoining local road network.</p> <p>There is still a level of uncertainty on precisely what improvements on the A3 can be delivered and the quantum of growth any potential improvements will facilitate during the Local Plan period. If proposals are reliant upon improvements before they are able to come forward, the infrastructure needs to be identified as critical.</p> <p>The two RIS 1 schemes, M25 Junctions 10-16 and M25 Junction 10/A3 Wisley interchange, are currently planned to start construction before the end of the current roads period. However at this time there is not a detailed design to demonstrate the level of growth the schemes might facilitate.</p> <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p>We recommend that for Policy I2 to be justified, effective and "sound" in accordance with the NPPF, the following wording additions should be applied:</p> <p><u>Policy I2</u>  <i>Proposal sites adjacent to the A3 and M25 and other large sites will need to take account of any emerging proposals by Highways England or any other licenced strategic highway authority appointed by the Secretary of State under the Infrastructure Act 2015. <u>Planning permission will not be granted for sites that adversely impact the safe and efficient operation of the local and</u></i></p> </div>	<p>Guildford, capable of being delivered in the next roads period (2020-2025), subject to the normal value for money being applied. ...</p> <p>We note that the delivery of housing in the later stages of the plan period is dependent upon a major improvement to the A3 through Guildford. It is essential that the Local Plan provides the planning policy framework to ensure development does not come forward in advance of critical infrastructure. As a result of clarification received at our recent meeting, it is now understood how the Local Plan intends to do this. <u>Therefore we wish to formally withdraw our representation to this policy.</u>' (p.1-2; Emphasis in original.)</p>

Organisation	Relevant duty to cooperate representations	GBC response
	<p><u>strategic road networks or that compromises the delivery of emerging improvements.</u></p> <p>' (Emphasis in original.)</p>	
<p>Highways England (July 2016)</p>	<p><b>'SUSTAINABILITY APPRAISAL</b></p> <p>The Sustainability Appraisal (SA) identifies that traffic is an issue locally, both on the Local and Strategic Road Networks. It states that the spatial strategy <i>"must be scrutinised in terms of the potential to support modal shift, minimise worsened traffic along key routes and at key junctions and deliver required upgrades to transport infrastructure"</i>.</p> <p>Eight alternative spatial strategy options are set out within in the SA. Option 1 is a low growth option (housing) and for each option thereafter the housing growth increases up to Option 8 which is described as High growth option at all locations. The degree of impact on transport increases in line with the quantum of growth I number of sites supported, with two exceptions; notably, Option 7 (Glandon Golf) performs better than Option 6 (Liddington Hall). Option 4, the Council's preferred option performs poorly in terms of its effects on transport network, mainly because of isolated site of Wisley Airfield site and the effects on the SRN. However, the SA does not draw strong conclusions about possible transport effects of each option due to the absence of detailed transport modelling evidence at the time of writing.</p> <p>The SA highlights that delivery of housing is dependent upon major improvements to A3 and on the RIS schemes. <i>"Delivery of housing in the later stages of the plan period is dependent upon major</i></p>	<p>The SHAR 2016 was available to inform the SA Report Update (2017).</p> <p>Following a meeting on 1 September 2016 to explain and clarify the approach taken to this matter in the Draft Local Plan 2016, Highways England, in a letter dated 5 October 2016, stated that:</p> <p>'We note that the delivery of housing in the later stages of the plan period is dependent upon a major improvement to the A3 through Guildford. It is essential that the Local Plan provides the planning policy framework to ensure development does not come forward in advance of critical infrastructure. As a result of clarification received at our recent meeting, it is now understood how the Local Plan intends to do this.' (p.1-2.)</p>

Organisation	Relevant duty to cooperate representations	GBC response
	<p><i>improvement to the A3 through Guildford. The Department for Transport's Road Investment Strategy includes schemes for the A3 Guildford and the M25 Junction 10/A3 Wisley interchange; and interim 'quick win' schemes to deliver road safety and some congestion relief on the A3 in Guildford will be delivered within the plan period." As noted above, it is not considered "sound" to base the Local Plan on the A3 RIS 2 scheme.'</i> (Emphasis in original.)</p>	
<p>Highways England (July 2016)</p>	<p><b>'INFRASTRUCTURE DELIVERY PLAN (IDP)</b></p> <p>Within the IDP, the Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the Plan depends. The Schedule includes all three Highways England RIS schemes.</p> <p>The funding certainty of each of the schemes is not detailed. It is not clear from the Infrastructure Schedule what development can proceed without the A3 RIS scheme in place. Similarly it is not clear what alternative measures (and who is funding) could be considered in the event the A3 RIS scheme does not come forward to allow the planned developments to proceed. As such the IDP is not considered Justified, Effective or "sound" in line with the NPPF.'</p>	<p>Policies in the Draft Local Plan 2017, including those to which amendments were made, manage the risks arising from the uncertainties regarding the delivery and timing of delivery of the key infrastructure on which the delivery of the Plan depends, including the three RIS schemes. In this regard, see Policies ID1, ID3 (point (8)) and the site Policies A24 (requirement (2)), A25 (requirement (9)), A26 (requirement (9)) and A35 (requirement (5)).</p> <p>In producing a new Local Plan for its area, Guildford Borough Council as the local planning authority is required to allocate sites for development (NPPF, 2012: paragraph 157) and to assess the quality and capacity of infrastructure for transport and its ability to meet forecasts (NPPF, 2012: paragraph 162). The Submission Local Plan's spatial strategy and key infrastructure schemes, as included in the Infrastructure Schedule, have been planned together and are interdependent in various ways. In short, the spatial strategy as proposed is dependent on the key</p>

Organisation	Relevant duty to cooperate representations	GBC response
		infrastructure schemes as proposed.
Highways England (July 2016)	<p><b>‘STRATEGIC HIGHWAYS ASSESSMENT AND MODEL DEVELOPMENT VALIDATION REPORT</b></p> <p>Please see the attached Technical Note (Annex A) setting out comments from Highways England's consultants Mouchel about the Strategic Highways Assessment (June 2016) and Model Development Validation Report (June 2016) documents. It should be noted that Highways England had not previously seen the current Strategic Highways Assessment prior to this Local Plan consultation. Therefore we have been unable to provide early comments on the appropriateness of the assessment to demonstrate the impact of proposed growth on the SRN.</p> <div data-bbox="421 788 1317 1027" style="border: 1px solid black; padding: 5px;"> <p>Due to significant deficiencies both with the transport model and the scenario testing underpinning the Local Plan, Highways England considers that the Strategic Highways Assessment evidence base document cannot be used to consider the impacts of the GBC Proposed Submission Local Plan on the SRN. As such the Strategic Highways Assessment document is not considered Justified, Effective or "sound" in line with the NPPF.</p> </div>	<p>Following a meeting on 1 September 2016 to explain and clarify the approach taken to this matter in the Draft Local Plan 2016, Highways England, in a letter dated 5 October 2016, withdrew its previous representation of 18 July 2016 with respect to this matter as follows:</p> <p>‘As a result of clarification provided by Guildford Borough Council and Surrey County Council and the conditional requirements of delivery for key sites, Highways England’s concerns regarding the Strategic Highways Assessment are not a matter of soundness, <u>therefore we formally withdraw the representation</u>. Work is ongoing between Surrey County Council and Highways England to resolve any outstanding issues around modelling. This will continue up to the beginning of any subsequent hearing and beyond with outcomes likely being used to inform update to the Infrastructure Delivery Plan supporting the Local Plan.’ (p.2).</p> <p>Further evidence has been published as part of the evidence base accompanying the Submission Local Plan in the Study of performance of A3 trunk road interchanges in Guildford urban area to 2024 under development scenarios (Mott MacDonald, December 2017), the earliest date for the start of construction of the A3 Guildford scheme. This study assesses the impacts</p>

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		<p>of mainline queuing resulting from blocking back of traffic exiting at diverge junctions in the peak periods, the operation of merging and diverging at junctions in the peak periods, and impact on peak spreading. This responds to the issues raised by Highways England in 2016 on the SHAR 2016.</p> <p>Given the above position, as expressed in Highways England's letter dated 5 October 2016, we have not set out the Council's responses to the comments made in Annex A.</p>
Highways England (July 2016)	<p>'Further in Annex B accompanying this letter, we have set out our comments and suggested amendments to specific site policy wording. These comments /suggestions are on the basis that to date the impacts on the SRN from proposed growth has not been demonstrated to be deliverable throughout the plan period.'</p>	<p>Highways England's comments on the site policies A4, A24, A25, A26, A35, A43, A43a and A46 were given in an annex (Annex B), rather than in the covering letter, of their representation of 18 July 2016.</p> <p>Following a meeting on 1 September 2016 to explain and clarify the approach taken in the Draft Local Plan 2016, Highways England, in a letter dated 5 October 2016, variously withdrew its previous representation or provided further comment with respect to each of these site policies.</p> <p>Given that Highways England variously withdrew its previous representation or provided further comment with respect to each of these site policies, see below the rows headed '[Annex B]' for an explanation of the resulting positions for each of the site policies and GBC's corresponding responses.</p>

Organisation	Relevant duty to cooperate representations	GBC response
Highways England (July 2016)	<p><b><u>Transport Topic Paper</u></b></p> <p>We have reviewed the Transport Topic Paper which supports the Local Plan, please see Annex C with this letter.'</p>	<p>Highways England's comments on the Transport topic paper (June 2016) were given in an annex (Annex C), rather than in the covering letter, of their representation of 18 July 2016.</p> <p>Following a meeting on 1 September 2016 to explain and clarify the approach taken in the Draft Local Plan 2016, Highways England, in a letter dated 5 October 2016, variously withdrew its previously representations or provided further comment, albeit not specifically referenced to its comments on the Transport topic paper (June 2017).</p> <p>Given this, see below the rows headed '[Annex C]' for an explanation of the resulting positions and GBC's corresponding responses.</p>
Highways England (July 2016)	<p>'Highways England strongly supports Guildford's commitment to work with partners to address infrastructure constraints to ensure new development can be accommodated. We look forward to working with all parties which include Guildford Borough Council and Surrey County Council to identify and produce a robust transport strategy which would inform the size and scale of development deliverable within the Guildford area. We would welcome a meeting to discuss the issues raised in this letter and to agree a way forward up to the formal submission of the Local Plan.</p> <p>For background, you may be interested to read "The Strategic Road Network Planning for the Future" which is a guide to working with Highways England on planning matters.</p>	<p>We have continued to meet and work with Highways England and Surrey County Council in the preparation of the plan.</p> <p>Noted.</p>



Organisation	Relevant duty to cooperate representations	GBC response
	<p>Please see <a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/461023/N_150227_-_Highways_England_Planning_Document_FINAL-lo.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/461023/N_150227 - Highways England Planning Document FINAL-lo.pdf</a>.' (Emphasis in original.)</p>	
<p>Highways England (July 2016)</p>	<p>[Annex B]</p> <p><b>'Policy E4: Surrey Research Park</b></p> <p>Policy E4 proposes to extend the Research Park of over 10 ha which is expected to deliver around 35,000 sqm of additional office and research and development floor space (Use Class B1 a and b). Given the proximity and access to the site from the A3 it is requested that the applicant will be required to demonstrate that the site can be safely accommodated on the SRN, with suitable mitigation provided as required.</p> <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p>As the required interventions are not known we recommend that for Policy E4 to be Effective and "sound" in accordance with the NPPF, the following underlined wording additions should be applied:</p> <p><u>Planning permission will not be granted for this site until it has been demonstrated how the adverse impacts to the safe and efficient operation of the local and strategic road networks will be mitigated or if delivery of the site compromises the delivery of emerging improvements.</u></p> </div> <p>' (Emphasis in original.)</p>	<p>Following a meeting on 1 September 2016 to explain and clarify the approach taken to this matter in the Draft Local Plan 2016, Highways England, in a letter dated 5 October 2016, withdrew its previous representation of 18 July 2016 with respect to this policy as follows:</p> <p>'We have further reviewed the policy and recognise that this is a strategic economic policy. The actual site allocations are dealt with in Policy A26, <u>therefore we formally withdraw this representation.</u>' (Emphasis in original.)</p>

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Highways England (July 2016)	<p>[Annex B]</p> <p><b>Policy A24: Slyfield Area Regeneration Project, Guildford</b></p> <p>Policy A24 proposes the Slyfield site is allocated as a mixed use development for approximately 1,000 homes, four traveller pitches, light B1c industrial use and a waste management depot.</p> <p>The Policy A24 states that <i>"The Infrastructure Schedule in the latest Infrastructure Delivery Plan identifies the locations on the Local Highway Network and the Strategic Highway Network which could be expected to experience the most significant potential highway performance issues, in the absence of mitigating interventions, from development of this site"</i>. However it is noted that the Infrastructure Schedule does not specifically state the locations on either the Local Highway Network or the Strategic Highway Network directly affected by the site. It is suggested that the Infrastructure Schedule should be updated to match the Policy wording.</p> <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p>To date insufficient information has been provided to confirm whether or not the proposed development site is deliverable in transport terms on the SRN. We therefore recommend that for Policy A24 to be Effective and "sound" in accordance with the NPPF, the following underlined wording additions should be applied:</p> <p><i>Interventions will be required which address the potential highway performance issues which could otherwise result from the development, including on A320 Woking Road. The Infrastructure Schedule in the latest Infrastructure Delivery Plan identifies the</i></p> </div>	<p>Following a meeting on 1 September 2016 to explain and clarify the approach taken to this matter in the Draft Local Plan 2016, Highways England, in a letter dated 5 October 2016, withdrew its previous representation of 18 July 2016 with respect to this policy as follows:</p> <p>'We consider the policies provide a framework to how proposals can only be progressed if they meet the conditional requirements set out in the individual policies alongside requirements set out in I3. <u>Therefore we formally withdraw these representations.</u> However for further clarity we would recommend that some wording could be clearer particularly around the potential critical infrastructure requirements to enable delivery.' (Emphasis in original.)</p> <p>Policies in the Draft Local Plan 2017, including those to which amendments were made, manage the risks arising from the uncertainties regarding the delivery and timing of delivery of the key infrastructure on which the delivery of the Plan depends, including the three RIS schemes. In this regard, see Policies ID1, ID3 (point (8)) and the site Policies A24 (requirement (2)), A25 (requirement (9)), A26 (requirement (9)) and A35 (requirement (5)).</p> <p>Policy ID2, as amended by the changes in the Draft Local Plan 2017, requires that 'promoters of sites close</p>

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	<p data-bbox="427 280 1301 584"><i>locations on the Local Highway Network and the Strategic Highway Network which could be expected to experience the most significant potential highway performance issues, in the absence of mitigating interventions, from development of this site. <u>Planning permission will not be granted for this site(s) until it has been demonstrated how the adverse impacts to the safe and efficient operation of the local and strategic road networks will be mitigated or if delivery of the site compromises the delivery of emerging improvements.</u></i></p> <p data-bbox="427 619 725 651">' (Emphasis in original.)</p>	<p data-bbox="1346 280 2074 440">to the A3 and M25 and strategic sites will need to take account of any emerging proposals by Highways England or any other licenced strategic highway authority appointed by the Secretary of State under the Infrastructure Act 2015.'</p> <p data-bbox="1346 483 2074 850">Policy ID1 at point (4) states that 'The key infrastructure on which the delivery of the Plan depends is set out in the Infrastructure Schedule at Appendix C, or any updates in the latest Guildford borough Infrastructure Delivery Plan.' The Reasoned Justification for this policy explains that the Guildford borough Infrastructure Delivery Plan, containing the latest Infrastructure Schedule, 'will be regularly reviewed as further detail becomes available, particularly regarding infrastructure needed to support development later in the plan period'. Policy ID3 at point (8) is similar and also relevant.</p> <p data-bbox="1346 890 2074 1153">In addition, new development that will generate significant amounts of movement will, at the planning application stage, be supported by a Transport Statement or Transport Assessment, and subject to the policy tests in NPPF paragraph 32 and Policy ID3. Individual new developments may be required to provide mitigation measures additional to those in the Infrastructure Schedule.</p> <p data-bbox="1346 1193 2074 1326">So, the Submission Local Plan provides the planning policy framework to allow for the consideration of additional mitigation either through the development management process for planning applications, having</p>

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		regard particularly to Policy ID3 at point (7), or through any updates to the Infrastructure Schedule provided in the latest Guildford borough Infrastructure Delivery Plan, as provided for in Policy ID1 at point (4) and in Policy ID3 at point (8).
Highways England (July 2016)	<p>[Annex B]</p> <p><b>'Policy A25: Gosden Hill Farm, Merrow Lane, Guildford</b></p> <p>Policy A25 proposes the Gosden Hill site is allocated as a mixed use development for approximately 2000 homes, eight traveller pitches, 12,500 sqm of employment floor space (B1a/b), various retail uses, schools and a park and ride facility providing 500-700 car parking spaces, with additional land reserved for potential expansion of the facility to 1,000 spaces.</p> <p>Policy A25 sets out a requirement for a new junction on the A3 comprising the relocated A3 southbound off-slip, a new A3 southbound on-slip and connection via a new roundabout to the A3100, with associated infrastructure on the A3100 corridor within Burpham.</p> <p>The Department for Transport's Circular 02/2013 confirms that <i>"The creation of new accesses to the SRN can impact on its ability to fulfil the function of facilitating the safe and effective movement of goods and people in support of economic growth by compromising traffic movement and flow.</i></p> <p><i>In delivering economic growth at local level, it is essential that the wider economic needs of the country are not compromised. New</i></p>	<p>Following a meeting on 1 September 2016 to explain and clarify the approach taken to this matter in the Draft Local Plan 2016, Highways England, in a letter dated 5 October 2016, withdrew its previous representation of 18 July 2016 with respect to this policy as follows:</p> <p>'Highways England has no current plans for an improvement at this location (2<sup>nd</sup> bullet point in requirements, all moves junction), and we have no requirement to safeguard land for future needs in relation to the Roads Investment Strategy at the location, nor do we have any evidence that such an improvement is deliverable and in conformity with the Design Manual for Roads and Bridges. The policy should make clearer that the proposal for an all moves junction will be promoted by Guildford Borough Council/Surrey County Council and will need to be developed in partnership with Highways England. However, these are suggested amendments for clarification and are not considered a matter of soundness; <u>therefore we formally withdraw the representation.</u>' (Emphasis in original.)</p>

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	<p><i>accesses to busy high speed strategic roads lead to more weaving and turning manoeuvres, which in turn create additional risk to safety and reduce the reliability of journeys, resulting in a negative impact on overall national economic activity and performance.</i></p> <p><i>Where appropriate, proposals for the creation of new junctions or direct means of access may be identified and developed at the Plan-making stage in circumstances where it can be established that such now infrastructure is essential .for the delivery of strategic planned growth.</i></p> <p><i>Where the strategic growth test cannot be met there will be no additional junctions with, or direct means of access to, motorways and other routes of near motorway standard other than for the provision of signed roadside facilities for road users, maintenance compounds and, exceptionally, major transport interchanges".</i></p> <p>The congestion and safety impacts of a new A3 junction at this location could be significant. Whilst Highways England has a number of significant concerns with the Strategic Highway Assessment modelling evidence base underpinning the Local Plan, it does suggest that Scenario 3, which includes the new Gosden Hill A3 junction, leads to a worsening of traffic impacts on the SRN.</p> <p>The deliverability of a new junction needs to be fully assessed prior to submission of the Local Plan if growth proposed in the Local Plan is reliant upon said infrastructure to demonstrate its own deliverability. A robust business case will likely be required to demonstrate the need for, affordability of, and deliverability of a new A3 junction. It should be noted that we currently have no plans for an improvement on this section of the A3, therefor it would be for the</p>	<p>This requirement, which address the potential opportunity to provide an all movements junction, was changed in the Draft Local Plan 2017 (where it was numbered (2)) to remove reference to Highways England's emerging A3 Guildford Road Investment Strategy (RIS) scheme. The requirement will guide proposals for new development on the site brought forward through the planning application process.</p>

Organisation	Relevant duty to cooperate representations	GBC response
	<p>development proposers to promote the case for a new junction.</p> <p>To date neither the Local Plan nor its transport evidence base has confirmed that the new A3 access is essential for the delivery of the Gosden Hill Farm site, or that the new junction and associated infrastructure can be delivered safely without compromising traffic flow along the A3. Additionally, the financial deliverability of a new junction is not clear. The proposed new A3 junction associated with the Gosden Hill Farm development is therefore not considered Justified, Effective, or "sound" in line with the NPPF.</p> <p>Any safeguarding of land is a matter for the Local Planning Authority, Highways England have no current plans or proposals that would require a 30 metre strip of land to be safeguarded.</p> <div style="border: 1px solid black; padding: 5px;"> <p>We therefore recommend that for Policy A25 to be justified, effective and "sound" in accordance with the NPPF, the following policy wording additions and deletions should be applied:</p> <p><del>A new junction on the A3 comprising the relocated A3 southbound off-slip, a new A3 southbound on-slip and connection via a new roundabout to the A3100, with associated infrastructure on the A3100 corridor within Burpham</del></p> <p><del>Any proposals for the development of the site should have regard to the potential opportunity to provide an all movements junction of the A3 trunk road with the A3100 London Road, the B2215 London Road and the A247 Clendon Road. This could form part of the proposals for Highways England's emerging A3 Guildford scheme for which construction is anticipated to commence in Road Period 2 (2020/21 to 2024/25) as required by the Department for</del></p> </div>	

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	<p>Transport's "Road Investment Strategy".</p> <p><del>This is likely to preclude development on a 30 metre strip of land on the northern boundary of the site adjacent to the A3 and to the east of the new junction as required above. The strip of land could potentially be required for the provision of a connector road to the B2215 London Road.</del></p> <p><u>Proposals must comply in all respects with design standards. Where there would be physical changes to the network, schemes must be submitted to road safety, environmental, and non-motorised user audit procedures, as well as any other assessment appropriate to the proposed development. The Design Manual for Roads and Bridges sets out details of the Secretary of State's requirements for access, design, and audit, with which proposals must conform.</u></p> <p><i>Interventions will be required which address the potential highway performance issues which could otherwise result from the development. The Infrastructure Schedule in the latest Infrastructure Delivery Plan identifies the locations on the Local Highway Network and the Strategic Highway Network which could be expected to experience the most significant potential highway performance issues, in the absence of mitigating interventions. <u>Planning permission will not be granted for this site until it has been demonstrated how the adverse impacts to the safe and efficient operation of the local and strategic road networks will be mitigated or if delivery of the site compromises the delivery of emerging improvements.</u></i></p> <p>' (Emphasis in original.)</p>	

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Highways England (July 2016)	<p>[Annex B]</p> <p><b>‘Policy A26: Blackwell Farm, Hogs Back, Guildford</b></p> <p>Policy A26 proposes the Blackwell Farm site is allocated as a mixed use development for approximately 1,800 homes, six traveller pitches, 31,000 sqm of employment floor space (B1), various retail uses and a school.</p> <p>Policy A26 notes that the <i>"primary vehicular access to the site allocation will be via the existing or a realigned junction of the A31 and the Down Place access road, which will be signalised" and that a "secondary vehicular access is required from the site to Egerton Road, preferably via Gill Avenue"</i>. In addition it states that <i>"A through vehicular link is required via the above accesses between the A31 Farnham Road and Egerton Road to provide a new route to the Surrey Research Park, the University of Surrey's Manor Park campus and the Royal Surrey County Hospital. This will provide relief to the A31/A3 junction, in advance of the delivery of Highways England's A3 Guildford scheme"</i>.</p> <p>Whilst the new access is proposed just off the A3 on the adjoining A31, the traffic impacts of these proposals could potentially lead to significant detrimental impacts on the A3. Whilst Highways England has a number of significant concerns with the Strategic Highway Assessment modelling evidence base underpinning the Local Plan it does suggest that Scenario 3, which includes the new Blackwell Farm access onto the A31, leads to a worsening of traffic impacts on the SRN.</p>	<p>Following a meeting on 1 September 2016 to explain and clarify the approach taken to this matter in the Draft Local Plan 2016, Highways England, in a letter dated 5 October 2016, withdrew its previous representation of 18 July 2016 with respect to this policy as follows:</p> <p>‘We consider the policies provide a framework to how proposals can only be progressed if they meet the conditional requirements set out in the individual policies alongside requirements set out in I3. <u>Therefore we formally withdraw these representations.</u> However for further clarity we would recommend that some wording could be clearer particularly around the potential critical infrastructure requirements to enable delivery.’ (Emphasis in original.)</p> <p>Policies in the Draft Local Plan 2017, including those to which amendments were made, manage the risks arising from the uncertainties regarding the delivery and timing of delivery of the key infrastructure on which the delivery of the Plan depends, including the three RIS schemes. In this regard, see Policies ID1, ID3 (point (8)) and the site Policies A24 (requirement (2)), A25 (requirement (9)), A26 (requirement (9)) and A35 (requirement (5)).</p>



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	<p>The deliverability of a new junction needs to be fully assessed prior to submission of the Local Plan if growth proposed in the Local Plan is reliant upon said infrastructure to demonstrate its own deliverability. A robust business case will likely be required to demonstrate the need for, affordability of, and deliverability of a new A3 junction. It should be noted that we currently have no plans for an improvement on this section of the A3, therefore it would be for the development proposers to promote the case for a new junction.</p> <p>To date neither the Local Plan nor its transport evidence base has confirmed that the new access is essential for the delivery of the Blackwell Farm site in line with Circular 02/2013 or that the new junction can be delivered safely without compromising traffic flow along the A3. The proposed 'relief to the A31/A3 junction' has not been evidenced. The proposed new access and link road associated with the Blackwell Farm development is therefore not considered Justified, Effective, or "sound" in line with the NPPF.</p> <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p>We therefore recommend that for Policy A26 to be Effective and "sound" in accordance with the NPPF, the following policy wording additions and deletions should be applied:</p> <p><del>Primary vehicular access to the site allocation will be via the existing or a realigned junction of the A31 and the Down Place access road, which will be signalised.</del></p> <p><del>The design of the improved Down Place access road or a new adjacent parallel access road will be sympathetic to its setting variously within the AONB and AGLV. The impacts of this road will be minimised through the retention and enhancement of tree cover in this area and landscaping.</del></p> </div>	

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	<p>Secondary vehicular access is required from the site to Egerton Road, preferably via Gill Avenue</p> <p>A through vehicular link is required via the above accesses between the A31 Farnham Road and Egerton Road to provide a new route to the Surrey Research Park, the University of Surrey's Manor Park campus and the Royal Surrey County Hospital. This will provide relief to the A31/A3 junction, in advance of the delivery of Highways England's A3 Guildford scheme.</p> <p><u>Proposals must comply in all respects with design standards. Where there would be physical changes to the network, schemes must be submitted to road safety, environmental, and non-motorised user audit procedures, as well as any other assessment appropriate to the proposed development. The Design Manual for Roads and Bridges sets out details of the Secretary of State's requirements for access, design, and audit, with which proposals must conform.</u></p> <p><i>Interventions will be required which address the potential highway performance issues which could otherwise result from the development. The Infrastructure Schedule in the latest Infrastructure Delivery Plan identifies the locations on the Local Highway Network and the Strategic Highway Network which could be expected to experience the most significant potential highway performance issues, in the absence of mitigating interventions. <u>Planning permission will not be granted for this site until it has been demonstrated how the adverse impacts to the safe and efficient operation of the local and strategic road</u></i></p>	

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	<p><u>networks will be mitigated or if delivery of the site compromises the delivery of emerging improvements.</u></p> <p>' (Emphasis in original.)</p>	
<p>Highways England (July 2016)</p>	<p>[Annex B]</p> <p><b>'Policy A35: Land at former Wisley airfield, Ockham</b></p> <p>Policy A35 proposes the former Wisley Airfield site is allocated as a mixed use development for approximately 2,000 homes, 1,800 sqm of 81 employment floor space, 2,500 sqm of 82/88 employment floor space, various retail uses and new schools.</p> <p>Policy A35 notes that the <i>"primary vehicular access to the site allocation will be via the A3 Ockham interchange" and "a through vehicular link is required between the A3 Ockham interchange and Old Lane"</i></p> <p>The congestion and safety impacts of the development at this location could be significant. To date neither the Local Plan nor its transport evidence base has confirmed that the proposed development trips can be accommodated at the junction in terms of both capacity and safety. The proposal to have the site's primary access from the A3 Ockham interchange is therefore not considered Justified, Effective, or "sound" in line with the NPPF.</p> <p>We therefore recommend that for Policy A35 to be Effective and "sound" in accordance with the NPPF, the following policy wording additions and deletions should be applied:</p>	<p>Following a meeting on 1 September 2016 to explain and clarify the approach taken to this matter in the Draft Local Plan 2016, Highways England, in a letter dated 5 October 2016, withdrew its previous representation of 18 July 2016 with respect to this policy as follows:</p> <p>'We consider the policies provide a framework to how proposals can only be progressed if they meet the conditional requirements set out in the individual policies alongside requirements set out in I3. <u>Therefore we formally withdraw these representations.</u> However for further clarity we would recommend that some wording could be clearer particularly around the potential critical infrastructure requirements to enable delivery.'</p> <p>(Emphasis in original.)</p> <p>Policies in the Draft Local Plan 2017, including those to which amendments were made, manage the risks arising from the uncertainties regarding the delivery and timing of delivery of the key infrastructure on which the delivery of the Plan depends, including the three RIS schemes. In this regard, see Policies ID1, ID3 (point (8)) and the site Policies A24 (requirement (2)), A25</p>

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	<p>Primary vehicular access to the site allocation will be via the A3 Ockham interchange.</p> <p>A through vehicular link is required between the A3 Ockham interchange and Old Lane.</p> <p><i>Interventions will be required which address the potential highway performance issues which could otherwise result from the development. The Infrastructure Schedule in the latest Infrastructure Delivery Plan identifies the locations on the Local Highway Network and the Strategic Highway Network which could be expected to experience the most significant potential highway performance issues, in the absence of mitigating interventions. To include, <u>as a minimum</u>, mitigation schemes to address issues:</i></p> <p><i>on the A3 and M25 and at the M25 Junction 10/A3 Wisley interchange</i>  <i>on B2215 Ripley High Street</i>  <i>at the junctions of Ripley High Street with Newark Lane/Rose Lane</i>  <i>at junction of Old Lane with A3 on-slip (Guildford bound).</i></p> <p><u><i>Planning permission will not be granted for this site until it has been demonstrated how the adverse impacts to the safe and efficient operation of the local and strategic road networks will be mitigated or if delivery of the site compromises the delivery of emerging improvements.</i></u></p> <p>' (Emphasis in original.)</p>	<p>(requirement (9)), A26 (requirement (9)) and A35 (requirement (5)).</p>

Organisation	Relevant duty to cooperate representations	GBC response
Highways England (July 2016)	<p>[Annex B]</p> <p><b>'Policy A43: Land at Garlick's Arch, Send Marsh/Burnt Common and Ripley and Policy A43a: Land for new north facing slip roads to/from A3 at Send Marsh/Burnt Common.</b></p> <p>Policy A43 proposes the Land at Garlick's Arch site is allocated as a mixed use development for approximately 400 homes and up to 7,000 sqm of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). Policy A43a proposes sites either side of the A3 are allocated for a new northbound on-slip to the A3 trunk road from A247 Clandon Road and a new southbound off-slip from the A3 trunk road to A247 Clandon Road.</p> <p>The congestion and safety impacts of a new A3 junction at this location could be significant. Whilst Highways England has a number of significant concerns with the Strategic Highway Assessment modelling evidence base underpinning the Local Plan it does suggest that Scenario 3, which includes the new Send/Burnt Common A3 junction, leads to a worsening of traffic impacts on the SRN.</p> <p>The deliverability of a new junction needs to be fully assessed prior to submission of the Local Plan if growth proposed in the Local Plan is reliant upon said infrastructure to demonstrate its own deliverability. A robust business case will likely be required to demonstrate the need for, affordability of, and deliverability of a new A3 junction. It should be noted that we currently have no plans for an improvement on this section of the A3, therefore it would be for the</p>	<p>Following a meeting on 1 September 2016 to explain and clarify the approach taken to this matter in the Draft Local Plan 2016, Highways England, in a letter dated 5 October 2016, noted that:</p> <p>'It remains unclear if these proposals are deliverable and what the conditional requirements are to enable the proposals to progress. It is not clear if proposals set out in A43 are dependent on Guildford's aspirations set out in A43a. To date, we do not have any evidence that such an improvement is deliverable and in conformity with the Design Manual for Roads and Bridges. We welcome further discussions on these policies.'</p> <p>Guildford Borough Council notes that the requirements to enable the site to progress, as amended in the Draft Local Plan 2017, plus minor modifications for the Submission Local Plan, are listed under 'Requirements' in Policy A43a.</p> <p>Guildford Borough Council considers that schemes SRN9 and SRN10, allocated in Policy A43a, are deliverable in accordance with DfT Circular 02/2013. Work is ongoing to demonstrate the Council's position.</p>

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	<p>development proposers to promote the case for a new junction.</p> <p>To date neither the Local Plan nor its transport evidence base has confirmed the need for the new junction, in line with the Circular, or that the new junction and associated infrastructure can be delivered safely without compromising traffic flow along the A3. Additionally, the financial deliverability of a new junction is not clear.</p> <p>The proposed new A3 junction at Send/Burnt Common is therefore not considered Justified, Effective, or "sound" in line with the NPPF.</p> <p>We therefore recommend that for Policy A43 to be Effective and "sound" in accordance with the NPPF, the following underlined wording additions should be applied:</p> <p><u>Policy A43: Requirements</u>  <u>Planning permission will not be granted for this site until it has been demonstrated how the adverse impacts to the safe and efficient operation of the local and strategic road networks will be mitigated or if delivery of the site compromises the delivery of emerging improvements.</u></p> <p><u>Policy A43a: Requirements</u>  <u>Sites to be used for new slip roads to/from A247 Clandon Road connecting with the A3 trunk road as per Appendix C Infrastructure Schedule.</u></p> <p><u>Proposals must comply in all respects with design standards. Where there would be physical changes to the network, schemes must be submitted to road safety, environmental, and non-motorised user audit procedures, as well as any other assessment</u></p>	

Organisation	Relevant duty to cooperate representations	GBC response
	<p><u>appropriate to the proposed development. The Design Manual for Roads and Bridges sets out details of the Secretary of State's requirements for access, design, and audit, with which proposals must conform.</u></p> <p>' (Emphasis in original.)</p>	
<p>Highways England (July 2016)</p>	<p>[Annex B]</p> <p><b>'Policy A46: Land to the south of Normandy and north of Flexford</b></p> <p>Policy A46 proposes this site is allocated for approximately 1,100 homes, a nursing home, various retail uses and a school.</p> <p>Due to the relative proximity and scale of the proposed development it may significantly impact the SRN. To date neither the Local Plan nor its transport evidence base has confirmed that the proposed development trips can be accommodated on the SRN in terms of both capacity and safety. The proposal is therefore not considered Justified, Effective, or "sound" in line with the NPPF.</p> <p>We therefore recommend that for Policy A46 to be Effective and "sound" in accordance with the NPPF, the following underlined wording additions should be applied:</p> <p><i>Interventions will be required which address the potential highway performance issues which could otherwise result from the development. The Infrastructure Schedule in the latest Infrastructure Delivery Plan identifies the locations on the Local Highway Network and the Strategic Highway Network which</i></p>	<p>Following a meeting on 1 September 2016 to explain and clarify the approach taken to this matter in the Draft Local Plan 2016, Highways England, in a letter dated 5 October 2016, withdrew its previous representation of 18 July 2016 with respect to this policy as follows:</p> <p>'We consider the policies provide a framework to how proposals can only be progressed if they meet the conditional requirements set out in the individual policies alongside requirements set out in I3. <u>Therefore we formally withdraw these representations.</u> However for further clarity we would recommend that some wording could be clearer particularly around the potential critical infrastructure requirements to enable delivery.'</p> <p>(Emphasis in original.)</p> <p>The site was removed from the Draft Local Plan 2017 on the basis that the secondary school is now being provided on Blackwell Farm.</p>

Organisation	Relevant duty to cooperate representations	GBC response
	<p><i>could be expected to experience the most significant potential highway performance issues, in the absence of mitigating interventions. <u>Planning permission will not be granted for this site until it has been demonstrated how the adverse impacts to the safe and efficient operation of the local and strategic road networks will be mitigated or if delivery of the site compromises the delivery of emerging improvements.</u></i></p> <p>' (Emphasis in original.)</p>	
<p>Highways England (July 2016)</p>	<p>[Annex C]</p> <p><b>'TRANSPORT TOPIC PAPER (JUNE 2016)</b></p> <p><b><u>2. Policy Context</u></b></p> <p>The Topic Paper notes that Department of Transport's DfT Circular 02/2013 is relevant to 'plan making' and the Paper refers to paragraph 18 which states that "<i>Capacity enhancements and infrastructure required to deliver strategic growth should be identified at the Local Plan stage</i>".</p> <p>The Local Plan identifies the A3 RIS scheme as the infrastructure required to deliver housing in the later stages of its plan period. However, the A3 RIS scheme is not committed. Highways England is concerned about the "soundness" of the Local Plan's reliance on the non-committed RIS scheme.' (Emphasis in original.)</p>	<p>Following a meeting on 1 September 2016 to explain and clarify the approach taken to this matter in the Draft Local Plan 2016, Highways England, in a letter dated 5 October 2016, stated that:</p> <p><i>'We support Guildford's commitment to work with Highways England to develop improvements to the A3 and M25. It is noted from the Local Plan, the implementation of the three RIS schemes during the plan period is required in order to be able to accommodate planned growth.</i></p> <p><i>Highways England is committed to commence construction of two RIS1 schemes during roads period 1, namely M25 Junction 10/A3 Wisley Interchange and M25 Junction 10 – 16. Work is ongoing on a number of options but there is not a detailed design available at this</i></p>



Organisation	Relevant duty to cooperate representations	GBC response
		<p><i>time. ...</i></p> <p><i>You will be aware that Highways England is currently developing options for a potential scheme on the A3 in Guildford, capable of being delivered in the next roads period (2020-2025), subject to the normal value for money being applied. ...</i></p> <p><i>We note that the delivery of housing in the later stages of the plan period is dependent upon a major improvement to the A3 through Guildford. It is essential that the Local Plan provides the planning policy framework to ensure development does not come forward in advance of critical infrastructure. As a result of clarification received at our recent meeting, it is now understood how the Local Plan intends to do this. <u>Therefore we wish to formally withdraw our representation to this policy.</u>' (p.1-2; Emphasis in original.)</i></p>
Highways England (July 2016)	<p>[Annex C]</p> <p><b><u>3. Evidence Base</u></b></p> <p>The Topic Paper refers to the Transport Strategy and Strategic Highway Assessment Report evidence base documents.</p> <p>The Strategic Highway Assessment notes that <i>“should the RIS schemes not be forthcoming then the residual cumulative impact of the Proposed Submission Local Plan on the highway network could</i></p>	<p>Following a meeting on 1 September 2016 to explain and clarify the approach taken to this matter in the Draft Local Plan 2016, Highways England, in a letter dated 5 October 2016, stated that:</p> <p><i>‘We support Guildford’s commitment to work with</i></p>

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	<p><i>be considered severe” ...and... “to avoid this occurring in such circumstances of the RIS schemes not being forthcoming, then the quantum and location of development as proposed may have to be amended”.</i></p> <p>To avoid such a revision to the Local Plan, it is suggested that suitable alternative measures be considered and detailed at this Proposed Submission stage.’ (Emphasis in original.)</p>	<p><i>Highways England to develop improvements to the A3 and M25. It is noted from the Local Plan, the implementation of the three RIS schemes during the plan period is required in order to be able to accommodate planned growth.</i></p> <p><i>Highways England is committed to commence construction of two RIS1 schemes during roads period 1, namely M25 Junction 10/A3 Wisley Interchange and M25 Junction 10 – 16. Work is ongoing on a number of options but there is not a detailed design available at this time. ...</i></p> <p><i>You will be aware that Highways England is currently developing options for a potential scheme on the A3 in Guildford, capable of being delivered in the next roads period (2020-2025), subject to the normal value for money being applied. ...</i></p> <p><i>We note that the delivery of housing in the later stages of the plan period is dependent upon a major improvement to the A3 through Guildford. It is essential that the Local Plan provides the planning policy framework to ensure development does not come forward in advance of critical infrastructure. As a result of clarification received at our recent meeting, it is now understood how the Local Plan intends to do this.’ (p.1-2; Emphasis in original.)</i></p> <p>In producing a new Local Plan for its area, Guildford Borough Council as the local planning authority is</p>

Organisation	Relevant duty to cooperate representations	GBC response
		<p>required to allocate sites for development (NPPF, 2012: paragraph 157) and to assess the quality and capacity of infrastructure for transport and its ability to meet forecasts (NPPF, 2012: paragraph 162). The Submission Local Plan's spatial strategy and key infrastructure schemes, as included in the Infrastructure Schedule, have been planned together and are interdependent in various ways. In short, the spatial strategy as proposed is dependent on the key infrastructure schemes as proposed.</p>
<p>Highways England (July 2016)</p>	<p>[Annex C]</p> <p><b><u>5. Appraisal and Local Plan</u></b></p> <p><u>Policy I2: Supporting the Department for Transport's "Road Investment Strategy"</u></p> <p>The Strategic Highway Assessment Report finds that the implementation of the RIS schemes is required to be able to accommodate future planned growth in the borough. In response to this, GBC has included Policy I2 'Supporting the Department for Transport's Road Investment Strategy' within the Local Plan.</p> <p><u>Strategic Road Network Schemes</u></p> <p>The Topic Paper notes that Highways England is developing several targeted improvement schemes (SRN 1, 6-8) for the Guildford section of the A3. Given the uncertainty of the schemes, they have not been included in the Strategic Highway Assessment. Highways England considers this a sound approach.</p>	<p>Noted.</p> <p>Following a meeting on 1 September 2016 to explain and clarify the approach taken to this matter in the Draft Local Plan 2016, Highways England, in a letter dated 5 October 2016, stated that:</p> <p>'...the early targeted small improvement schemes identified to deliver road safety and some congestion</p>

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		<p>relief on the A3 through Guildford, are not committed proposals. Therefore they are not schemes that can be relied upon to be delivered within the plan period.' (p.2)</p> <p>In March 2017, the Government committed funding for two of these schemes, namely:</p> <ul style="list-style-type: none"> <li>- SRN7 'A3 northbound off-slip lane widening to Tesco roundabout'</li> <li>- SRN8 'A3 southbound off-slip lane widening to A320 Stoke Interchange improvement scheme'.</li> </ul> <p>There are also two further targeted improvement schemes under development by Highways England, but which are not yet committed, namely:</p> <ul style="list-style-type: none"> <li>- A3 Guildford average speed camera/road safety scheme, formerly referenced as SRN1 in the Draft Local Plan 2016</li> <li>- Beechcroft Drive new access road/road safety scheme, formerly referenced as SRN6 in the Draft Local Plan 2016.</li> </ul> <p>We have removed these schemes (SRN1 and SRN6) from the Infrastructure Schedule in the Draft Local Plan 2017. This responds to Highways England's advice that these schemes 'are not committed proposals' and therefore that 'they are not schemes that can be relied upon to be delivered within the plan period' (Highways England, 5 October 2016: p.2). We have disregarded this advice as regards schemes SRN7 and SRN8 given the Government's March 2017 funding announcement.</p>

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	<p>The Local Plan proposes a series of new A3/A31 accesses. The congestion and safety impacts of the proposed new A3/A31 junctions could be significant. Whilst Highways England has a number of significant concerns with the Strategic Highway Assessment Report, it does suggest that Scenario 3, which includes these new junctions, leads to a worsening of traffic impacts on the SRN.</p> <p>The Topic Paper references Circular 02/2013 paragraph 39, which covers the provision of new accesses to the SRN. It is recommended that the Topic Paper also references Circular 02/2013 paragraphs 37-38 and 40-44, which set out the requirements for new SRN access proposals. The requirements include the need to confirm that a new access is essential for site delivery and that the new junction and associated infrastructure can be delivered safely without compromising SRN traffic flow.</p> <p>To date neither the Local Plan nor its transport evidence base has confirmed that the new accesses meet this criteria. Therefore Highways England is concerned about the "soundness" of the new access proposals, in line with NPPF.'</p>	<p>In the SHAR 2016, scenario 3 included the addition of access arrangements for potential large sites as well as mitigation on the Local Road Network (LRN). We consider that the access schemes may be masking the benefits of the mitigation-type schemes on the LRN. Nevertheless, we maintain that it is appropriate to consider access to strategic sites at the Plan-making stage.</p> <p>Guildford Borough Council considers that schemes SRN4, SRN9 and SRN10, the latter two schemes which are allocated in Policy A43a, are deliverable. Work is ongoing to demonstrate the Council's position.</p>
Highways England (July 2016)	<p>[Annex C]</p> <p><u>Phasing of development and transport schemes</u></p> <p>Appendix 3 shows the relationship between the phasing of developments and transport schemes. In the absence of the A3 RIS scheme, it is not clear how much growth can come forward. Appendix 3 shows that nearly 6,000 houses come forward after the completion of the A3 RIS scheme in 2028, suggesting that these</p>	<p>Following a meeting on 1 September 2016 to explain and clarify the approach taken to this matter in the Draft Local Plan 2016, Highways England, in a letter dated 5 October 2016, stated the following with respect to Policy I2, which is relevant here:</p> <p><i>'We support Guildford's commitment to work with</i></p>

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	<p>houses <i>may</i> be reliant on the scheme. If correct, this equates to approximately 40% of the plan period provision for housing. Further clarification is requested.</p> <p>Highways England is concerned about the "soundness" of the Local Plan's reliance on a non-committed scheme, as well as the lack of alternative mitigation.</p>	<p><i>Highways England to develop improvements to the A3 and M25. It is noted from the Local Plan, the implementation of the three RIS schemes during the plan period is required in order to be able to accommodate planned growth.</i></p> <p><i>Highways England is committed to commence construction of two RIS1 schemes during roads period 1, namely M25 Junction 10/A3 Wisley Interchange and M25 Junction 10 – 16. Work is ongoing on a number of options but there is not a detailed design available at this time. ...</i></p> <p><i>You will be aware that Highways England is currently developing options for a potential scheme on the A3 in Guildford, capable of being delivered in the next roads period (2020-2025), subject to the normal value for money being applied. ...</i></p> <p><i>We note that the delivery of housing in the later stages of the plan period is dependent upon a major improvement to the A3 through Guildford. It is essential that the Local Plan provides the planning policy framework to ensure development does not come forward in advance of critical infrastructure. As a result of clarification received at our recent meeting, it is now understood how the Local Plan intends to do this. <u>Therefore we wish to formally withdraw our representation to this policy.</u>' (p.1-2; Emphasis in original.)</i></p>

Organisation	Relevant duty to cooperate representations	GBC response
		<p>Policies in the Submission Local Plan manage the risks arising from the uncertainties regarding the delivery and timing of delivery of the key infrastructure on which the delivery of the Plan depends, including the three RIS schemes. In this regard, see Policies ID1, ID3 (point (8)) and the site Policies A24 (requirement (2)), A25 (requirement (9)), A26 (requirement (9)) and A35 (requirement (5)).</p> <p>In producing a new Local Plan for its area, Guildford Borough Council as the local planning authority is required to allocate sites for development (NPPF, 2012: paragraph 157) and to assess the quality and capacity of infrastructure for transport and its ability to meet forecasts (NPPF, 2012: paragraph 162). The Submission Local Plan's spatial strategy and key infrastructure schemes, as included in the Infrastructure Schedule, have been planned together and are interdependent in various ways. In short, the spatial strategy as proposed is dependent on the key infrastructure schemes as proposed.</p>
Highways England (July 2016)	<p>[Annex C]</p> <p><u>Funding of transport schemes and Appendix 4</u></p> <p>Appendix 4 shows the anticipated funding arrangements for the transport schemes. The funding certainty of each of the schemes is not detailed. Similarly the financial deliverability and therefore "soundness" of the new A3/A31 junctions, relative to the scale of proposed development, is not clear.</p>	<p>In relation to viability of development, the Council has undertaken a Local Plan and CIL Viability Study (2016) and Local Plan Viability Update (2017) – see published evidence base. This demonstrates that the policy requirements of the plan (including affordable housing provision) do not unduly burden residential and non-residential development. The Viability Study</p>

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	<p>It is noted that Topic Paper paragraph 5.52 suggests that the Burnt Common/ Clandon Road slip roads are being promoted to mitigate the impact of the former Wisley airfield site. However this is not referenced within Appendix 4, or Local Plan Policy A35. Further clarification is requested.'</p>	<p>endeavoured to use site specific costs, including for transport infrastructure, as inputs to the total development costs in testing viability in relation to strategic sites. (see Table 5.6 of the Local Plan and CIL Viability Study, 2016). Furthermore, the Study reflects viability for CIL (and hence the potential for contribution to infrastructure) across a range of development types, including strategic sites, over and above Local Plan policy requirements and other development costs.</p> <p>Schemes SRN9 and SRN10, allocated in Policy A43a, are being promoted to mitigate the impact of the level of strategic planned growth and in particular the development traffic flows resulting from the development of a new settlement at the former Wisley airfield site (Policy A35), as well as limiting any increase in traffic joining and leaving the A3 at the Ockham interchange. Requirement (4) for the site allocation Policy A35, as proposed in the Draft Local Plan 2017, is that the two new slip roads are the identified mitigation to address the impacts on Ripley High Street and surrounding rural roads.</p>
Highways England (October 2016)	<p>'In our letter of 18 July 2016 in response to the Guildford Local Plan Regulation 19 Consultation, we raised a number of issues and concerns.</p> <p>Thank you for the meeting on the 1 September 2016 in which these were discussed. As agreed, we have undertaken a review of our response; this letter supersedes Highways England's position in terms of representations.</p>	Noted.



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	<p>It should be noted that Highways England's representations were intended to be considered as suggestions/advice, the assessment of soundness is a matter for the Inspector.'</p>	
<p>Highways England (October 2016)</p>	<p><b><u>'Policy I2 - Supporting the Department for Transport's "Roads Investment Strategy"</u></b></p> <p>We support Guildford's commitment to work with Highways England to develop improvements to the A3 and M25. It is noted from the Local Plan, the implementation of the three RIS schemes during the plan period is required in order to be able to accommodate planned growth.</p> <p>Highways England is committed to commence construction of two RIS1 schemes during roads period 1, namely M25 Junction 1 O/A3 Wisley Interchange and M25 Junction 10 - 16. Work is ongoing on a number of options but there is not a detailed design available at this time. We will engage and share information with local partners including Guildford Borough Council as the scheme progresses.</p> <p>You will be aware that Highways England is currently developing options for a potential scheme on the A3 in Guildford, capable of being delivered in the next roads period (2020-2025), subject to the normal value for money being applied. The scheme proposes widening the existing carriageway to provide additional capacity and safety improvements between the A31 Farnham Road and the A3/A320 Stoke Road. The design of such a scheme is complex and needs to consider a number of potential options, a process which takes time to complete. We will continue close working with Guildford Borough Council and Surrey County Council to progress the</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p>

Organisation	Relevant duty to cooperate representations	GBC response
	<p>development of the potential scheme.</p> <p>We note that the delivery of housing in the later stages of the plan period is dependent upon a major improvement to the A3 through Guildford. It is essential that the Local Plan provides the planning policy framework to ensure development does not come forward in advance of critical infrastructure. As a result of clarification received at our recent meeting, it is now understood how the Local Plan intends to do this. <u>Therefore we wish to formally withdraw our representation to this policy.</u></p> <p>In addition, the early targeted small improvement schemes identified to deliver road safety and some congestion relief on the A3 through Guildford, are not committed proposals. Therefore they are not schemes that can be relied upon to be delivered within the plan period.' (Emphasis in original.)</p>	<p>Policies in the Draft Local Plan 2017, including those to which amendments were made, manage the risks arising from the uncertainties regarding the delivery and timing of delivery of the key infrastructure on which the delivery of the Plan depends, including the three RIS schemes. In this regard, see Policies ID1, ID3 (point (8)) and the site Policies A24 (requirement (2)), A25 (requirement (9)), A26 (requirement (9)) and A35 (requirement (5)).</p> <p>In March 2017, the Government committed funding for two of these schemes, namely:</p> <ul style="list-style-type: none"> <li>- SRN7 'A3 northbound off-slip lane widening to Tesco roundabout'</li> <li>- SRN8 'A3 southbound off-slip lane widening to A320 Stoke Interchange improvement scheme'.</li> </ul> <p>There are also two further targeted improvement schemes under development by Highways England, but which are not yet committed, namely:</p> <ul style="list-style-type: none"> <li>- A3 Guildford average speed camera/road safety scheme, formerly referenced as SRN1 in the Draft Local Plan 2016</li> <li>- Beechcroft Drive new access road/road safety scheme, formerly referenced as SRN6 in the Draft Local Plan 2016.</li> </ul> <p>We have removed these schemes (SRN1 and SRN6)</p>

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		from the Infrastructure Schedule in the Draft Local Plan 2017. This responds to Highways England's advice that these schemes "are not committed proposals" and therefore that "they are not schemes that can be relied upon to be delivered within the plan period" (Highways England, 5 October 2016: p.2). We have disregarded this advice as regards schemes SRN7 and SRN8 given the Government's March 2017 funding announcement.
Highways England (October 2016)	<p><b><u>'Strategic Highways Assessment and Model Development Validation Report</u></b></p> <p>As a result of clarification provided by Guildford Borough Council and Surrey County Council and the conditional requirements of delivery for key sites, Highways England's concerns regarding the Strategic Highways Assessment are not a matter of soundness, <u>therefore we formally withdraw the representation.</u> Work is ongoing between Surrey County Council and Highways England to resolve any outstanding Issues around modelling. This will continue up to the beginning of any subsequent hearing and beyond with outcomes likely being used to inform updates to the Infrastructure Delivery Plan supporting the Local Plan.' (Emphasis in original.)</p>	<p>Noted.</p> <p>Further evidence has been published as part of the evidence base accompanying the Submission Local Plan in the Study of performance of A3 trunk road interchanges in Guildford urban area to 2024 under development scenarios (Mott MacDonald, December 2017), the earliest date for the start of construction of the A3 Guildford scheme. This study assesses the impacts of mainline queuing resulting from blocking back of traffic exiting at diverge junctions in the peak periods, the operation of merging and diverging at junctions in the peak periods, and impact on peak spreading. This responds to the issues raised by Highways England in 2016 on the SHAR 2016.</p>
Highways England (October 2016)	<p><b><u>'Policy E4: Surrey Research Park</u></b></p> <p>We have further reviewed the policy and recognise that this is a</p>	Noted.

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	<p>strategic economic policy. The actual site allocations are dealt with in Policy A26, <u>therefore we formally withdraw this representation.</u> (Emphasis in original.)</p>	
<p>Highways England (October 2016)</p>	<p><b><u>A24 Slyfield Area Regeneration Project, Guildford</u></b>  <b><u>A26 Blackwell Farm, Hogs Back, Guildford</u></b>  <b><u>A35 Land at former Wisley Airfield, Ockham</u></b>  <b><u>A46 Land to the south of Normandy and north of Flexford</u></b></p> <p>We consider the policies provide a framework to how proposals can only be progressed if they meet the conditional requirements set out in the individual policies alongside requirements set out in policy I3. <u>Therefore, we formally withdraw these representations.</u> However, for further clarity we would recommend that some wording could be clearer particularly around the potential critical infrastructure requirements to enable delivery.’ (Emphasis in original.)</p>	<p>Policies in the Draft Local Plan 2017, including those to which amendments were made, manage the risks arising from the uncertainties regarding the delivery and timing of delivery of the key infrastructure on which the delivery of the Plan depends, including the three RIS schemes. In this regard, see Policies ID1, ID3 (point (8)) and the site Policies A24 (requirement (2)), A25 (requirement (9)), A26 (requirement (9)) and A35 (requirement (5)).</p> <p>Policy ID2, as amended by the changes in the Draft Local Plan 2017, requires that ‘promoters of sites close to the A3 and M25 and strategic sites will need to take account of any emerging proposals by Highways England or any other licenced strategic highway authority appointed by the Secretary of State under the Infrastructure Act 2015.’</p> <p>Policy ID1 at point (4) states that ‘The key infrastructure on which the delivery of the Plan depends is set out in the Infrastructure Schedule at Appendix C, or any updates in the latest Guildford borough Infrastructure</p>

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		<p>Delivery Plan.' The Reasoned Justification for this policy explains that the Guildford borough Infrastructure Delivery Plan, containing the latest Infrastructure Schedule, 'will be regularly reviewed as further detail becomes available, particularly regarding infrastructure needed to support development later in the plan period'. Policy ID3 at point (8) is similar and also relevant.</p> <p>In addition, new development that will generate significant amounts of movement will, at the planning application stage, be supported by a Transport Statement or Transport Assessment, and subject to the policy tests in NPPF paragraph 32 and Policy ID3. Individual new developments may be required to provide mitigation measures additional to those in the Infrastructure Schedule.</p> <p>So, the Submission Local Plan provides the planning policy framework to allow for the consideration of additional mitigation either through the development management process for planning applications, having regard particularly to Policy ID3 at point (7), or through any updates to the Infrastructure Schedule provided in the latest Guildford borough Infrastructure Delivery Plan, as provided for in Policy ID1 at point (4) and in Policy ID3 at point (8).</p>
Highways England (October 2016)	<p><b><u>Policy A25 Gosden Hill Farm, Merrow Lane, Guildford</u></b></p> <p>Highways England has no current plans for an improvement at this location (2<sup>nd</sup> bullet point in requirements, all moves junction), and we</p>	<p>This requirement, which address the potential opportunity to provide an all movements junction, was</p>

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	<p>have no requirement to safeguard land for future needs in relation to the Roads Investment Strategy at the location. Nor do we have any evidence that such an improvement is deliverable and in conformity with the Design Manual for Roads and Bridges. The policy should make clearer that the proposal for an all moves junction will be promoted by Guildford Borough Council/Surrey County Council and will need to be developed in partnership with Highways England. However, these are suggested amendments for clarification and are not considered a matter of soundness, <u>therefore we formally withdraw the representation.</u> (Emphasis in original.)</p>	<p>changed in the Draft Local Plan 2017 (where it was numbered (2)) to remove reference to Highways England's emerging A3 Guildford Road Investment Strategy (RIS) scheme. The requirement will guide proposals for new development on the site brought forward through the planning application process.</p>
<p>Highways England (October 2016)</p>	<p><b><u>'Policies A43 Land at Garlick's Arch. Send Marsh/Burnt Common and Ripley, A43a Land for new north facing slip roads to/from A3 at Send Marsh/Burnt Common</u></b></p> <p>It remains unclear if these proposals are deliverable and what the conditional requirements are to enable the proposals to progress. It is not clear if proposals set out in A43 are dependent on Guildford's aspirations set out in A43a. To date, we do not have any evidence that such an improvement is deliverable and in conformity with the Design Manual for Roads and Bridges. We welcome further discussions on these policies.'</p>	<p>Guildford Borough Council notes that the requirements to enable the site to progress, as amended in the Draft Local Plan 2017, plus minor modifications for the Submission Local Plan, are listed under 'Requirements' in Policy A43a.</p> <p>Guildford Borough Council considers that schemes SRN9 and SRN10, allocated in Policy A43a, are deliverable in accordance with DfT Circular 02/2013. Work is ongoing to demonstrate the Council's position.</p>
<p>Highways England (October 2016)</p>	<p>'I still think a statement of common ground between Highways England, Surrey and Guildford would be beneficial. There is and will continue to be a need for collaborative working between us. Although this does not remove uncertainties, it could provide reassurance that work will continue up to and beyond the Local Plan adoption.'</p>	<p>The Council agrees that a statement or statements of common ground would be beneficial for the Examination in Public. We are working with Highways England and Surrey County Council to seek to achieve a statement or statements of common ground.</p>

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Highways England (2017)	<p data-bbox="414 316 1328 651">'Highways England has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such, Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. In this case Highways England's interests relate to the potential impact of development on the A3 and M25.</p> <p data-bbox="414 691 1328 991">Overall, in accordance with national policy, we look to GBC to promote strategies, policies and land allocations that will support alternatives to the car and the operation of a safe and reliable transport network. We would be concerned if any material increase in traffic were to occur on the SRN because of planned growth within the Guildford borough, without careful consideration of mitigation measures. It is important that the Local Plan provide the planning policy framework to ensure development cannot progress without the appropriate infrastructure in place.</p> <p data-bbox="414 1198 1328 1327">When considering proposals for growth, any impacts on the SRN will need to be identified and mitigated as far as reasonably possible. We will support a local authority proposal that considers sustainable measures, which manage down demand and reduce the need to</p>	<p data-bbox="1337 316 2092 347">Noted.</p> <p data-bbox="1337 691 2092 991">The Council's spatial development strategy addresses the development needs of the borough and where that development should be focused, actively managing patterns of growth to make the fullest possible use of public transport, walking and cycling, and focusing significant development in locations which are or can be made sustainable. The promotion of sustainable transport has been a key consideration in setting the spatial development strategy.</p> <p data-bbox="1337 1031 2092 1158">Travel plan and demand management measures have been explored through the Local Plan-making process and applied to minimise the vehicular trip generation from sites in the Submission Local Plan.</p> <p data-bbox="1337 1198 2092 1327">The NPPF states that 'The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel' (paragraph 29). The Draft Local Plan seeks to achieve a</p>

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	<p>travel. Infrastructure improvements on the SRN should only be considered as a last resort. Proposed new growth will need to be considered in the context of the cumulative impact from already proposed development on the A3 and M25.</p> <p>This correspondence follows on from our letters dated 18 July and 5 October 2016, produced in response to the 2016 Proposed Submission Local Plan consultation for which our comments remain (with the exception of Policy A46 which has subsequently been removed from the 2017 Proposed Submission Local Plan).’</p>	<p>modest modal shift over the period to 2034, within the context of an absolute increase in traffic volumes, that latter accommodated by schemes to increase highway capacity and improve road safety. This is set out in the new text in paragraph 4.6.28 of the Draft Local Plan 2017.</p> <p>The transport evidence base includes the following studies:</p> <ul style="list-style-type: none"> <li>- Guildford Borough Proposed Submission Local Plan “June 2016”: Strategic Highway Assessment Report (Surrey CC, June 2016) (hereafter the SHAR 2016) and its addendum (Guildford BC, June 2017)</li> <li>- Study of performance of A3 trunk road interchanges in Guildford urban area to 2024 under development scenarios (Mott MacDonald, December 2017).</li> </ul> <p>The SHAR 2016 represents a robust “worst case” in terms of transport demand and supply assumptions, as it does not assess and therefore does not account for the mitigation; including the potential for modal shift, and the new and improved sustainable transport choices provided by the rail, bus and active modes schemes included in the Draft Local Plan 2016 and makes no allowance for any internalisation of trips within the larger sites.</p> <p>The total mileage and the total number of vehicle hours travelled on the borough’s highway networks is forecast</p>



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		<p>to increase, with or without a Submission Local Plan. For instance, based on the SHAR 2016 models, even with no future development in Guildford borough, total mileage will increase by 12 per cent between 2009 and 2031 in the average morning peak hour, driven by development elsewhere and changes in demographic profile and car ownership.</p> <p>In 2031, with the Draft Local Plan 2016, there is a 2 per cent increase in the average morning peak hour and a 2 per cent decrease in the average evening peak hour in the average speed of vehicles on the borough’s highway network, compared to a theoretical future in which there is no development and are no new highway schemes in Guildford borough.</p> <p>The SHAR 2016 concludes that “The results show that for Scenario 5, which represents the quantum and distribution of development proposed in the Proposed Submission Local Plan together with the key highway schemes, there will not be a severe impact on the local and strategic highway network” (p.62). The addendum to the SHAR 2016 (Guildford BC, June 2017) found that this conclusion was “not considered likely to change” as a result of the key changes made to proposed site policies and to the programme of transport schemes in the Draft Local Plan 2017.</p>

Organisation	Relevant duty to cooperate representations	GBC response
Highways England (2017)	<p><b><u>'POLICY S2: PLANNING FOR THE BOROUGH - OUR SPATIAL DEVELOPMENT STRATEGY TOPIC PAPER: TRANSPORT APPENDIX 3 (2017) LAND AVAILABILITY ASSESSMENT ADDENDUM (2017)</u></b></p> <p>It is noted that the Annual Housing Target numbers presented in Policy S2 differ to those presented in the Topic Paper: Transport Appendix 3 (2017) and the Land Availability Assessment Addendum (2017). It would be helpful if this could be clarified.</p>	<p>The Annual Housing Target table in Policy S2 is proposed to be amended as a minor modification to aid clarity (namely show the annual target over the plan period 2015/16 – 2033/34) which sums to 12,426 (the total housing requirement – 654 homes per annum over 19 years). The figures in this table are the targets against which we will measure our rolling 5 year housing land supply. The NPPG requires that past undersupply is met ideally within the first five years of the plan. We do not consider this is possible in Guildford given the extent of the accrued deficit at point of adoption, the dependency of some sites on the delivery of necessary infrastructure and the longer lead in time associated with strategic sites. For these reasons the Annual Housing Target begins lower and increases over time with the majority of the homes expected to occur later in the plan period.</p> <p>The housing trajectory in the LAA (and Transport topic paper) illustrates the expected delivery of homes. This totals a greater number than the total housing requirement. This buffer ensures we can meet our target of 12,426 as it gives flexibility should sites not deliver as planned. By having an annual delivery that is greater than the annual target against which we measure</p>

Organisation	Relevant duty to cooperate representations	GBC response
	<p>The housing trajectory contained in the Land Availability Assessment Addendum demonstrates that many thousands of houses are expected to be delivered after the next roads period (2020-2025). Some of these Local Plan sites may be wholly or partially reliant on a potential improvement on the A3 through Guildford. It would be helpful to understand in more detail which development sites are expected to come forward ahead of a potential scheme and which development sites may be dependent upon it.</p> <p>Owing to the existing A3 congestion issues and the lack of certainty for any potential future scheme on the A3 through Guildford, the management and phasing of the Local Plan developments will be critical.'</p>	<p>against ensures we can, over time, meet our accrued deficit.</p> <p>The housing trajectory in the updated LAA (2017) should be used to understand when sites are likely to come forward. The table separates the larger Green Belt sites. For details of the other sites, and which 5 year period they are expected to be delivered, please see Appendix B of the LAA. There is a summary table at the front of each subsection.</p> <p>Further evidence has been published as part of the evidence base accompanying the Submission Local Plan in the Study of performance of A3 trunk road interchanges in Guildford urban area to 2024 under development scenarios (Mott MacDonald, December 2017), the earliest date for the start of construction of the A3 Guildford scheme. This study assesses the impacts of mainline queuing resulting from blocking back of traffic exiting at diverge junctions in the peak periods, the operation of merging and diverging at junctions in the peak periods, and impact on peak spreading. This responds to the issues raised by Highways England in 2016 on the SHAR 2016.</p> <p>Policies in the Submission Local Plan manage the risks arising from the uncertainties regarding the delivery and timing of delivery of the key infrastructure on which the delivery of the Plan depends, including the three RIS schemes. In this regard, see Policies ID1, ID3 (point (8)) and the site Policies A24 (requirement (2)), A25</p>

Organisation	Relevant duty to cooperate representations	GBC response
		<p>(requirement (9)), A26 (requirement (9))and A35 (requirement (5)).</p> <p>In producing a new Local Plan for its area, Guildford Borough Council as the local planning authority is required to allocate sites for development (NPPF, 2012: paragraph 157) and to assess the quality and capacity of infrastructure for transport and its ability to meet forecasts (NPPF, 2012: paragraph 162). The Submission Local Plan’s spatial strategy and key infrastructure schemes, as included in the Infrastructure Schedule, have been planned together and are interdependent in various ways. In short, the spatial strategy as proposed is dependent on the key infrastructure schemes as proposed.</p>
Highways England (2017)	<p><b><u>POLICY ID1: INFRASTRUCTURE AND DELIVERY</u></b></p> <p>It is noted that the delivery of housing in the later stages of the plan period is dependent upon a major improvement to the A3 through Guildford. As set out in Policy ID1, it is essential that “the delivery of developments may need to be phased to reflect the delivery of infrastructure” and that “if the timely provision of infrastructure necessary to support new development cannot be secured, planning permission will be refused”. We consider this to be essential due to the existing congestion issues and the lack of certainty of any future scheme, as noted above.’</p>	Noted.
Highways England (2017)	<p><b><u>POLICY ID2: SUPPORTING THE DEPARTMENT FOR TRANSPORT’S “ROAD INVESTMENT STRATEGY”</u></b></p>	

Organisation	Relevant duty to cooperate representations	GBC response
	<p>Our letter dated 5 October 2016 sets out Highways England comments on Policy ID2 and specifically its position on a potential A3 and planned M25 schemes, which remain the current position. However you will note that subsequent to a public consultation earlier this year, we plan to announce the preferred route for the M25 Junction 10 scheme in late August. This may or may not have implications for proposals set out in policies A43A (Burnt Common) and A35 (Wisley Airfield) can be delivered.</p>	<p>Noted that Highways England’s comments on Policy ID2 and its position on a potential A3 and planned M25 schemes remain unchanged.</p> <p>Highways England’s Preferred Route Announcement for the M25 Junction 10/A3 Wisley interchange scheme was made on 29 November 2017. At this stage we are not aware of any consequential changes required to the Submission Local Plan. The Development Consent Order process provides opportunities for the Council and other parties to make representations with respect to the proposed scheme.</p> <p>Policies in the Draft Local Plan 2017, including those to which amendments were made, manage the risks arising from the uncertainties regarding the delivery and timing of delivery of the key infrastructure on which the delivery of the Plan depends, including the three RIS schemes. In this regard, see Policies ID1, ID3 (point (8)) and the site Policies A24 (requirement (2)), A25 (requirement (9)), A26 (requirement (9)) and A35 (requirement (5)).</p> <p>Policy ID2, as amended by the changes in the Draft Local Plan 2017, requires that ‘promoters of sites close to the A3 and M25 and strategic sites will need to take account of any emerging proposals by Highways England or any other licenced strategic highway authority appointed by the Secretary of State under the Infrastructure Act 2015.’</p>

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		<p>Policy ID1 at point (4) states that ‘The key infrastructure on which the delivery of the Plan depends is set out in the Infrastructure Schedule at Appendix C, or any updates in the latest Guildford borough Infrastructure Delivery Plan.’ The Reasoned Justification for this policy explains that the Guildford borough Infrastructure Delivery Plan, containing the latest Infrastructure Schedule, ‘will be regularly reviewed as further detail becomes available, particularly regarding infrastructure needed to support development later in the plan period’. Policy ID3 at point (8) is similar and also relevant.</p> <p>In addition, new development that will generate significant amounts of movement will, at the planning application stage, be supported by a Transport Statement or Transport Assessment, and subject to the policy tests in NPPF paragraph 32 and Policy ID3. Individual new developments may be required to provide mitigation measures additional to those in the Infrastructure Schedule.</p> <p>So, the Submission Local Plan provides the planning policy framework to allow for the consideration of additional mitigation either through the development management process for planning applications, having regard particularly to Policy ID3 at point (7), or through any updates to the Infrastructure Schedule provided in the latest Guildford borough Infrastructure Delivery Plan, as provided for in Policy ID1 at point (4) and in Policy ID3 at point (8).</p>

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	<p>We are pleased to advise that on the 10th March 2017 the Department of Transport announced £220 million to help motorists to beat congestion and this included schemes for the A3 Guildford Northbound Off Slip at the University Interchange and A3 Guildford Stoke Interchange Southbound Off Slip Improvements. Further, we can also advise that schemes at Beechcroft Drive and for Safety Enforcement Cameras on the A3 through Guildford have been funded to enable progress with the intention to start construction before 2020.'</p>	<p>Schemes SRN7 and SRN8 are included in the Infrastructure Schedule at Appendix C.</p> <p>It is not considered that the Beechcroft Drive new access road/road safety scheme (formerly scheme SRN6) is a key infrastructure scheme on which the delivery of the Local Plan depends. Given this, and Highways England's earlier advice that this scheme and an A3 Guildford average speed camera/road safety scheme (formerly scheme SRN1) 'are not committed proposals' and therefore that 'they are not schemes that can be relied upon to be delivered within the plan period' (Highways England, 5 October 2016: p.2) – which we consider remains the case – we removed both these schemes from the Infrastructure Schedule in the Draft Local Plan 2017.</p> <p>Highways England is proposing to undertake detailed design work on the Beechcroft Drive new access road/road safety scheme. The detailed design work is funded. However, there is no certainty of funding for the works.</p> <p>Nevertheless, we do consider that the scheme SRN2 'A3 Guildford (A320 Stoke interchange junction to A31 Hog's Back junction) 'Road Investment Strategy' scheme' would likely include changes to the existing access at Beechcroft Drive.</p> <p>The Beechcroft Drive new access road/road safety scheme remains under development and consideration</p>

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		by Highways England and accordingly we have included it as an 'aspirational' scheme in the Guildford Borough Transport Strategy 2017 (Guildford Borough Council, November 2017).
Highways England (2017)	<p><b><u>'POLICY ID3: SUSTAINABLE TRANSPORT FOR NEW DEVELOPMENTS</u></b></p> <p>Highways England is supportive of the changes to Policy ID3, which are required to help maintain the safe operation and performance of the SRN.'</p>	Noted.
Highways England (2017)	<p><b><u>'POLICY A25: GOSDEN HILL APPENDIX C INFRASTRUCTURE SCHEDULE</u></b></p> <p>Highways England notes the proposed reduction in the number of dwellings and employment space to be delivered during the plan period. The removal of the definition of the size of the Park and Ride site from Policy A25 is also noted.</p> <p>We support the proposed changes to the policy. We particularly note the transport package to facilitate growth at the site which includes having regard to the forthcoming Sustainable Movement Corridor Supplementary Planning Document which alongside other measures has the potential to reduce impacts on the A3.</p>	Noted.
Highways England (2017)	<p><b><u>POLICY A26: BLACKWELL FARM, HOGS BACK</u></b></p> <p>Highways England notes the proposed reduction in the number of dwellings to be delivered during the plan period.</p>	Further evidence has been published as part of the evidence base accompanying the Submission Local Plan in the Study of performance of A3 trunk road



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	<p>Highways England also notes that it is proposed that a through vehicular link between the A31 Farnham Road and Egerton Road will now be controlled to provide a new route for employees, residents and emergency services. It is noted that this is now said to “reduce impact on the A31/A3 junction, in advance of the delivery of Highways England’s A3 Guildford scheme”. We are keen to work with GBC and/or the site promoter to understand the degree of impact reduction on the A31/A3 junction ahead of a potential A3 scheme. Further it is unclear at this stage what level of growth can be delivered in advance of a potential A3 improvement and the consequences for growth at the site if there is no A3 improvement.</p>	<p>interchanges in Guildford urban area to 2024 under development scenarios (Mott MacDonald, December 2017), the earliest date for the start of construction of the A3 Guildford scheme. This study assesses the impacts of mainline queuing resulting from blocking back of traffic exiting at diverge junctions in the peak periods, the operation of merging and diverging at junctions in the peak periods, and impact on peak spreading. This responds to the issues raised by Highways England in 2016 on the SHAR 2016.</p> <p>The implementation of the three Road Investment Strategy (RIS) schemes during the Plan period, alongside other critical infrastructure, is required in order to be able to accommodate future planned growth both outside and within the borough. Accordingly, Policy ID1 at points (4) and (5), as well other policies in the Submission Local Plan, require regard be had to the dependencies between planned development and key infrastructure schemes.</p> <p>Policies in the Draft Local Plan 2017 manage the risks arising from the uncertainties regarding the delivery and timing of delivery of the key infrastructure on which the delivery of the Plan depends, including the three Road Investment Strategy (RIS) schemes. See Policy ID1, particularly at points (4) and (5). Point (4) refers to the key infrastructure as being ‘set out in the Infrastructure Schedule at Appendix C, or any updates in the latest Guildford borough Infrastructure Schedule’. Policy ID3, at point (8), contains similar phrasing. Policy A26 at</p>

Organisation	Relevant duty to cooperate representations	GBC response
		requirement (9) is relevant and uses phrasing similar to that in Policy ID1 at points (4) and (5).
Highways England (2017)	<p><b><u>POLICY A35: LAND AT FORMER WISLEY AIRFIELD, OCKHAM</u></b>  <b><u>POLICY A43: LAND AT GARLICKS ARCH, SEND MARSH/BURNT COMMON AND RIPLEY</u></b>  <b><u>POLICY A43A: LAND FOR NEW NORTH FACING SLIP ROADS TO/FROM A3 AT SEND MARSH/BURNT COMMON</u></b>  <b><u>POLICY A58: LAND AROUND BURNT COMMON WAREHOUSE, LONDON ROAD, SEND.</u></b>  <b><u>APPENDIX C INFRASTRUCTURE SCHEDULE</u></b>  <b><u>TRANSPORT TOPIC PAPER, PARAGRAPH 5.56</u></b></p> <p>The requirements section of Policy A35 newly proposes that additional mitigation is required for the Wisley Airfield development in the form of “two new slip roads at A247 Clandon Road (Burnt Common)”. The Transport Topic Paper paragraph 5.56 notes that the new slip roads are being promoted to “mitigate the impact of the level of strategic planned growth and in particular the development traffic flows resulting from the development of a new settlement at the former Wisley Airfield site (site allocation Policy A35)”.</p> <p>As noted in our letter dated 5 October 2016, it remains unclear if these slip road proposals are deliverable and what the conditional requirements are to enable the proposals to progress. It is not clear if proposals set out in Policy A43 (and now additionally Policy A58 and A35) are dependent on GBC’s aspirations set out in A43a. Appendix C Infrastructure Schedule notes that the Burnt Common slip road scheme will be wholly developer funded. To date we do not have any evidence that such an improvement is deliverable and could be designed in conformity with the Design Manual for Roads and</p>	<p>Schemes SRN9 and SRN10, allocated in Policy A43a, are being promoted to mitigate the impact of the level of strategic planned growth and in particular the development traffic flows resulting from the development of a new settlement at the former Wisley airfield site (Policy A35), as well as limiting any increase in traffic joining and leaving the A3 at the Ockham interchange. Requirement (4) for the site allocation Policy A35, as proposed in the Draft Local Plan 2017, is that the two new slip roads are the identified mitigation to address the impacts on Ripley High Street and surrounding rural roads.</p> <p>The Council considers that site allocation Policy A43, as well as Policy A58, are not directly dependent on schemes SRN9 and SRN10, allocated in Policy A43a. Rather, as stated above, the Council has planned on the basis that these schemes will be delivered by the</p>

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	<p>Bridges. We would welcome further discussions on these policies.</p> <p>We understand that the Wisley Airfield site is expected to go to Planning Appeal in September 2017 which will likely have implications for the soundness of these policies, therefore discussions are urgent if proposals are reliant upon the improvement set out in A43A that is being promoted by GBC and Surrey County Council.</p>	<p>developer of the former Wisley airfield site (Policy A35) and that this will be 'when first needed to serve the development's occupants and users and/or to mitigate its otherwise adverse material impacts' (Policy ID1 at point (1)).</p> <p>In producing a new Local Plan for its area, Guildford Borough Council as the local planning authority is required to allocate sites for development (NPPF, 2012: paragraph 157) and to assess the quality and capacity of infrastructure for transport and its ability to meet forecasts (NPPF, 2012: paragraph 162). The Submission Local Plan's spatial strategy and key infrastructure schemes, as included in the Infrastructure Schedule, have been planned together and are interdependent in various ways. In short, the spatial strategy as proposed is dependent on the key infrastructure schemes as proposed.</p> <p>Guildford Borough Council considers that schemes SRN9 and SRN10, allocated in Policy A43a, are deliverable in accordance with DfT Circular 02/2013. Work is ongoing to demonstrate the Council's position.</p>
Highways England (2017)	<p><b><u>POLICY A46: LAND TO THE SOUTH OF NORMANDY AND NORTH OF FLEXFORD</u></b></p> <p>Highways England notes this policy has been removed in the 2017 Local Plan and as such our comments on this Policy included within our letter dated 5 October 2016 are to be withdrawn.</p>	Noted.

Organisation	Relevant duty to cooperate representations	GBC response
Highways England (2017)	<p data-bbox="414 316 1167 416"><b><u>‘ADDENDUM TO GUILDFORD BOROUGH PROPOSED SUBMISSION LOCAL PLAN “JUNE 2016” STRATEGIC HIGHWAY ASSESSMENT REPORT (SHAR)</u></b></p> <p data-bbox="414 451 1279 515">It is recognised that the transport evidence base (SHAR 2016) has not been updated, with no further transport modelling taking place.</p> <p data-bbox="414 550 1312 818">The Addendum document notes that “key changes made to proposed site policies and to the programme of transport schemes in the Draft Local Plan, as identified in the Draft Local Plan 2017, are not considered likely to change the conclusions of the SHAR 2016”. The SHAR 2016 concludes that: “the results of this assessment indicate that should the RIS schemes not be forthcoming then the residual cumulative impact of the Proposed Submission Local Plan on the highway network could be considered severe”.</p> <p data-bbox="414 853 1301 1058">As noted above, it would be helpful to understand in more detail which developments are expected to come forward ahead of a potential A3 improvement scheme and which developments may be dependent upon a scheme. The management and phasing of the Local Plan developments will be critical to maintain the safe operation and performance of the SRN.’</p>	<p data-bbox="1339 451 2087 885">Further evidence has been published as part of the evidence base accompanying the Submission Local Plan in the Study of performance of A3 trunk road interchanges in Guildford urban area to 2024 under development scenarios (Mott MacDonald, December 2017), the earliest date for the start of construction of the A3 Guildford scheme. This study assesses the impacts of mainline queuing resulting from blocking back of traffic exiting at diverge junctions in the peak periods, the operation of merging and diverging at junctions in the peak periods, and impact on peak spreading. This responds to the issues raised by Highways England in 2016 on the SHAR 2016.</p> <p data-bbox="1339 920 2074 1189">Policies in the Submission Local Plan manage the risks arising from the uncertainties regarding the delivery and timing of delivery of the key infrastructure on which the delivery of the Plan depends, including the three RIS schemes. In this regard, see Policies ID1, ID3 (point (8)) and the site Policies A24 (requirement (2)), A25 (requirement (9)), A26 (requirement (9))and A35 (requirement (5)).</p> <p data-bbox="1339 1224 2069 1326">In producing a new Local Plan for its area, Guildford Borough Council as the local planning authority is required to allocate sites for development (NPPF, 2012:</p>

Organisation	Relevant duty to cooperate representations	GBC response
		<p>paragraph 157) and to assess the quality and capacity of infrastructure for transport and its ability to meet forecasts (NPPF, 2012: paragraph 162). The Submission Local Plan’s spatial strategy and key infrastructure schemes, as included in the Infrastructure Schedule, have been planned together and are interdependent in various ways. In short, the spatial strategy as proposed is dependent on the key infrastructure schemes as proposed.</p>
<p>Highways England (2017)</p>	<p><b><u>‘TRANSPORT TOPIC PAPER JUNE 2017</u></b></p> <p><b><u>3. Evidence Base</u></b>  The Topic Paper refers to the Transport Strategy and Addendum Strategic Highway Assessment Report (see comments above) evidence base documents.</p> <p>With regard to the Addendum Strategic Highway Assessment Report it is noted that “GBC, with Surrey County Council, we will be undertaking new supplementary technical work prior to the submission of the plan to the Secretary of State. This will respond to the remaining issues raised by Highways England on the strategic highway assessment”.</p> <div style="border: 1px solid black; padding: 5px;"> <p>Highways England looks forward to working with GBC and Surrey County Council to take forward the supplementary technical work. This would likely include outputs from the forthcoming update to Surrey SINTRAM model and be used to inform updates to the Infrastructure Delivery Plan supporting the Local Plan. Further the supplementary technical work could help inform a Statement of Common Ground or similar between Highways England, Surrey</p> </div>	<p>Further evidence has been published as part of the evidence base accompanying the Submission Local Plan in the Study of performance of A3 trunk road interchanges in Guildford urban area to 2024 under development scenarios (Mott MacDonald, December 2017), the earliest date for the start of construction of the A3 Guildford scheme. This study assesses the impacts of mainline queuing resulting from blocking back of traffic exiting at diverge junctions in the peak periods, the operation of merging and diverging at junctions in the peak periods, and impact on peak spreading. This responds to the issues raised by Highways England in 2016 on the SHAR 2016.</p>

Organisation	Relevant duty to cooperate representations	GBC response
	County Council and GBC.	<p>The transport evidence base includes the following studies:</p> <ul style="list-style-type: none"> <li>- Guildford Borough Proposed Submission Local Plan “June 2016”: Strategic Highway Assessment Report (Surrey CC, June 2016) (hereafter the SHAR 2016) and its addendum (Guildford BC, June 2017)</li> <li>- Study of performance of A3 trunk road interchanges in Guildford urban area to 2024 under development scenarios (Mott MacDonald, December 2017).</li> </ul> <p>The SHAR 2016, which uses an ‘average peak hour’ approach to assess potential traffic impacts, was prepared by Surrey County Council, the Local Highway Authority. Highways England has accepted the use of the SHAR 2016 approach, when supplemented by assessments of the Guildford section of the A3 trunk road in respect of mainline queuing resulting from blocking back of traffic exiting at diverge junctions in the peak periods, the operation of merging and diverging at junctions in the peak periods, and impact on peak spreading. We have undertaken these supplementary assessments for the period to 2024, the earliest date for the start of construction of the A3 Guildford scheme.</p> <p>Work has not yet started on preparing a Sintram 7 model for Guildford borough. Therefore, the Sintram 7 model cannot form part of the transport evidence base.</p> <p>New development that will generate significant amounts</p>

Organisation	Relevant duty to cooperate representations	GBC response
	<p data-bbox="416 855 779 887"><u>5. Appraisal and Local Plan</u></p> <p data-bbox="416 887 1312 1054">GBC has included Policy ID2 ‘Supporting the Department for Transport’s Road Investment Strategy’ within the Local Plan and text within the Transport Topic Paper between paragraphs 5.33 and 5.57. With regard to the current status of the RIS schemes see our comments on Policy ID2 above.</p> <p data-bbox="416 1094 1312 1324">Paragraph 5.89 notes that “in the early years of the new Local Plan, the delivery of planned development and the impact of new development traffic on the SRN is likely to be an important ongoing consideration as the existing SRN suffers from significant congestion during peak periods. Highways England’s main concern is road safety and any proposal that adds significant levels of traffic to existing congested areas will need to be carefully assessed through</p>	<p data-bbox="1344 280 2074 480">of movement, will, at the planning application stage, be supported by a Transport Statement or Transport Assessment, and subject to the policy tests in NPPF paragraph 32 and Policy ID3. New developments may be required to provide mitigation measures additional to those in the Infrastructure Schedule.</p> <p data-bbox="1344 520 2074 815">In addition, the Submission Local Plan provides the planning policy framework to allow for the consideration of such additional mitigation either through the development management process for planning applications, having regard particularly to Policy ID3 at point (7), or through any updates to the Infrastructure Schedule provided in the latest Guildford borough Infrastructure Delivery Plan, as provided for in Policy ID1 at point (4) and in Policy ID3 at point (8).</p> <p data-bbox="1344 887 1715 919">See GBC’s response above.</p> <p data-bbox="1344 1094 2085 1324">Further evidence has been published as part of the evidence base accompanying the Submission Local Plan in the Study of performance of A3 trunk road interchanges in Guildford urban area to 2024 under development scenarios (Mott MacDonald, December 2017), the earliest date for the start of construction of the A3 Guildford scheme. This study assesses the impacts</p>

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	<p>the development management process for planning applications to ensure that it does not have a severe impact on road safety”.</p> <p>Paragraph 5.90 notes that “the delivery of planned development has been proposed to ensure that the sites, and phasing of sites, that will be delivered in the first years of the new Local Plan, and therefore in the absence of the Department for Transport’s RIS Road Period 1 and/or Road Period 2 schemes are located where traffic associated with them will have the least impact on the SRN’s links and junctions where current congestion issues are the most acute”.</p> <p>As noted above, it would be helpful to understand in detail which developments are expected to come forward ahead of a potential A3 scheme and which sites are dependent upon a scheme. This is required to allow critical management and phasing of the Local Plan developments to take place.’</p>	<p>of mainline queuing resulting from blocking back of traffic exiting at diverge junctions in the peak periods, the operation of merging and diverging at junctions in the peak periods, and impact on peak spreading. This responds to the issues raised by Highways England in 2016 on the SHAR 2016.</p> <p>Policies in the Submission Local Plan manage the risks arising from the uncertainties regarding the delivery and timing of delivery of the key infrastructure on which the delivery of the Plan depends, including the three RIS schemes. In this regard, see Policies ID1, ID3 (point (8)) and the site Policies A24 (requirement (2)), A25 (requirement (9)), A26 (requirement (9))and A35 (requirement (5)).</p> <p>In producing a new Local Plan for its area, Guildford Borough Council as the local planning authority is required to allocate sites for development (NPPF, 2012: paragraph 157) and to assess the quality and capacity of infrastructure for transport and its ability to meet forecasts (NPPF, 2012: paragraph 162). The Submission Local Plan’s spatial strategy and key infrastructure schemes, as included in the Infrastructure Schedule, have been planned together and are interdependent in various ways. In short, the spatial strategy as proposed is dependent on the key infrastructure schemes as proposed.</p>
Highways England	<p><b><u>SUSTAINABILTY APPRAISAL</u></b>  ‘Highways England has no comments on the Sustainability Appraisal,</p>	Noted.



Organisation	Relevant duty to cooperate representations	GBC response
(2017)	as the broad transport conclusions remain unchanged.'	
Historic England (2016)	<p>The Submission Local Plan seeks to achieve an appropriate balance between needs of protecting environmental qualities, including the historic environment, and the necessary growth and development to ensure Guildford's continued vitality and economic, social and environmental sustainability. In its high incidence of references to heritage and the historic environment, and the role this plays in achieving sustainable development, the plan largely succeeds in this respect.</p> <p>There are a few matters of detail that Historic England would like to see addressed in the final version of the plan, but we do not think these are fundamental impediments to its adoption.</p>	Noted
Historic England (2016)	<p><b>Historic Environment Information</b></p> <p>The heritage evidence base, referred to as being contained in the GBC Historic Environment Information (April 2016) requires further work; we note this is still in draft form and could be enhanced by inclusion of assessments of significance and value of historic environment as a whole and constituent assets. It would be useful to identify any actions necessary to sustain and enhance the significances of the historic environment and, in particular, how issues affecting the long-term sustainability of heritage assets, such as this at risk, may be addressed.</p> <p>A clearer explanation of how this evidence links to and underpins a positive strategy for the historic environment in the Local Plan should be included.</p>	The GBC Historic Environment Information document does refer to heritage at risk and gives links to Historic England's register of heritage at risk for the most up to date information.
Historic	<b>Policy P1</b>	

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England (2016)	We support Policy P1, in particular the intention to protect objects of historical significance.	<p>This aspect of P1 has been removed from the policy however P1 does require development proposals to be assessed against the provisions of the current Surrey Hills AONB Management Plan. The Surrey Hill Management Plan includes a number of Historic and Cultural Heritage Management Policies.</p> <p>Historic England responded to the 2017 consultation saying they were content with the proposed changes.</p>
Historic England (2016)	<p><b>Policy E7</b> We broadly support both the Vision (p 84) and policy for the town centre. A key characteristic of and a significant factor in its success is the historic environment, focussed on the setted High Street, and the range and concentration of heritage assets and features (ref. para 4.4.68). However, it will be important to proactively sustain these qualities and integrate their protection and enhancement into efforts to improve the retail and associated offer of the town, and we would like to see the wording of the policy strengthened in this respect; for instance, by the addition of an additional bullet point to this effect in the first paragraph of the policy or by explicitly connecting this policy to Policy D3.</p>	<p>Policy E7 is an Economy policy, rather than a Design policy. Design and Heritage are covered elsewhere within policies D1, D3 and D4 and it is not necessary or helpful to cross-reference these policies. Additional wording has been added to the section on Policy E7 Guildford Town Centre (paragraph 4.4.67 and 4.4.68) to reference the historic character of the town centre and its range and concentration of heritage assets. An additional sentence has also been added (paragraph 4.4.74) to state that we will ensure the public realm is enhanced and insist that all new development is of the highest design and environmental standards.</p>
Historic England (2016)	<p><b>Policy D1</b> Policy supported</p>	Noted
Historic England (2016)	<p><b>Policy D3</b> Policy is weak in its wording though supported by a good introduction and an appropriate reasoned justification. The weakness in the policy arises from its focus being reactive, and we would suggest a more proactive form of wording is sought that reflects some of the</p>	The wording of policy D3 has been amended to be more proactive and supportive.

Organisation	Relevant duty to cooperate representations	GBC response
	intentions set out para 4.5.45. As with other areas of policy, the NPPF requires the local plan to actively promote and support actions to sustain, enhance and enjoy the historic environment (ref. paras 126 and 157, final bullet) addressing, in particular, heritage at risk.	
Historic England (2016)	<p><b>Policy D4</b></p> <p>In view of the proposed removal of a number of historic villages from the Green Belt it is suggested, where appropriate, that conservation area appraisals are updated and revised to ensure any new development respects and reinforces the character, distinctiveness and setting of the settlements (this could be linked to Policy D3)</p>	Noted. The Council has a rolling programme of Conservation Area Appraisals. We are as a priority completing those within villages being proposed to be inset from the Green Belt.
Historic England (2016)	<p><b>Site allocations</b></p> <p>Some of the more significant (strategic) sites will require archaeological investigation / assessment prior to development especially where there is known to be historical activities that may be retain structures or remains of heritage significance (e.g. at former Wisley Airfield, heritage assessment needed in relation to the sites historic association with aviation development/innovation).</p>	Policy D3 seeks to conserve and enhance the historic environment. It also covers designated and undesignated heritage assets which includes areas of archaeological potential. Additional wording has been added to the reasoned justification addressing sites of archaeological importance or potential.
Historic England (2017)	Historic England's is content with the proposed changes to the draft Local Plan in as far as they relate to its remit.	Noted.
Natural England (2016)	<p><b>Habitats Regulations Assessment</b></p> <p>No comments</p>	Noted.
Natural England (2016)	<p><b>Sustainability Appraisal</b></p> <p>Natural England are generally supportive of list of Sustainability Objectives, however recommend that objective number 1 is renamed as "<u>Maintain</u>, conserve and enhance biodiversity and the natural environment".</p>	Wording amended as suggested in the SA 2017.

Organisation	Relevant duty to cooperate representations	GBC response
Natural England (2016)	<p><b>Vision and Objectives</b> Recommend that the “Environment” ambition has the word <u>maintain</u> added to it. It is very important to conserve and enhance biodiversity, but it is equally important in some cases to maintain and preserve what is already present on the site.</p>	Amended wording included as a proposed Minor Modification.
Natural England (2016)	<p><b>Policy P5</b> Natural England are broadly very supportive of this policy. The only element missing from this policy is reference to how the financial contributions will be secured by Guildford Borough Council. Would the Community Infrastructure Levy be used? We feel it is referencing this matter either within Policy P5 supporting text, or within the HRA which accompanies this document.</p>	This information has been included in the Habitats Regulations Assessment in the 2017 update.
Natural England (2017)	<p><b>Habitats Regulations Assessment</b> Natural England supports the overall conclusions of the assessment and can advise that the evidence used, particularly relating to Air Pollution is entirely appropriate.</p> <p>We have however had a conversation with Guildford Borough Council during this consultation period to discuss the readability of certain sections within the document. Natural England expects Guildford Borough Council to amend these sections before submission to the inspector which we would be happy to provide further comments on. Despite this, it is important to note that this will not alter the overall conclusions of the assessment which as stated above we are supportive of.</p>	<p>Noted.</p> <p>These sections have been amended and Natural England has been consulted on the revised wording. Natural England have stated that they “are now of the opinion that the HRA is of sufficient clarity, and that [their] previous concerns have been addressed.”</p>
Natural England	<p><b>Policy P5</b> We advise that under point (3) a separate point should be included to</p>	The Policy calls for a minimum of 8 hectares of SANG

Organisation	Relevant duty to cooperate representations	GBC response
(2017)	<p>state that the amount of SANG land needed can also depend on the size, scale and proximity of the development to the SPA as well as the number of expected occupants. The 8ha per 1,000 people standard is only the minimum that could be required.</p> <p>Natural England disagrees with paragraph 4.3.51 which should be revised. Natural England advise that there is potential for developments under the use class C2 to have a significant impact upon the SPA even if they are not for staff.</p> <p>The end of paragraph 4.3.54 should include that these developments will be assessed on a case by case basis and agreed with Natural England.</p> <p>Paragraph 4.3.62 should be revised to state that SAMM contributions are held by Hampshire County Council and that Natural England only act as a host to the project.</p>	<p>per 1,000 new occupants. Paragraph 4.3.57 states “a greater provision may be required where local or other circumstances indicate that this minimum amount would not be sufficient”. Further clarification is not considered necessary.</p> <p>The deletion of “staff” is included as a proposed Minor Modification.</p> <p>Amended wording included as a proposed Minor Modification.</p> <p>Amended wording included as a proposed Minor Modification.</p>
Natural England (2017)	<p><b>Policy ID4</b> We would recommend that in point (1) the word maintain is added to accompany conserve and enhance.</p>	<p>Amended wording included as a proposed Minor Modification.</p>
Natural England (2017)	<p><b>Policy A22</b> Part of this site is within 400m of the Thames Basin Heaths SPA. Whilst the policy makes reference to a care home being allocated within the 400m exclusion zone, it must be ensured that future residents will be too infirm and/ or have reduced mobility making it unlikely that they will be able to recreate on the SPA.</p> <p>This policy also states that 150 residential units are proposed. It must</p>	<p>The policy states the care home will be located within 400m of the SPA subject to agreement with Natural England that it will have no impact on the SPA, and that occupants must be of only limited mobility such that they are unlikely to visit the SPA. This covers the issue raised.</p>

Organisation	Relevant duty to cooperate representations	GBC response
	<p>be ensured that these units are located outside of the 400m exclusion zone and must provide an appropriate suite of mitigation to ensure that impacts upon the SPA are avoided.</p> <p>This site allocation is in very close proximity to the Whitmoor Common SSSI. Any direct or indirect impacts on this site should also be avoided or mitigated.</p>	<p>Direct and indirect impacts on the SPA are avoided and mitigated through the established approach based around SANG and SAMM, and through bespoke measures included in the policy.</p> <p>Policy P5 ensures that residential units will be built outside the 400m exclusion zone and that adequate and appropriate mitigation and avoidance measures will be required. Policy ID4 provides protection for Whitmoor Common.</p>
<p>Natural England (2017)</p>	<p><b>Policy A23</b></p> <p>This site is within 400m of the Thames Basin Heaths SPA and whilst allocated for a new burial ground, potential impacts on the SPA must still be considered especially given that a new car park and site access is proposed. We would expect measures to be put in place to ensure that the car park is not available to the general public.</p> <p>The site and the car park must not link to the Public Rights of Way which lead towards the SPA.</p> <p>This site allocation is in very close proximity to the Whitmoor Common SSSI. Any direct or indirect impacts on this site should also be avoided or mitigated.</p>	<p>The site allocation includes the following requirements:  (1) [a car park]... strictly limited to genuine visitors to the burial ground (enforced),  (3) Appropriate measures to discourage access from the burial ground or car park to the Thames Basin Heath SPA, and ensure there is no increase in recreational pressure within the SPA. It is considered that this prevents impacts related to increased car parking within the vicinity of the SPA.</p> <p>Requirement (4) is for an application level Habitats Regulations Assessment, which will ensure any other direct or indirect impacts are identified and avoided or mitigated.</p>
<p>Natural England (2017)</p>	<p><b>Policies A24, A25, A26, A27, A32, A33, A39, A43, A58</b></p> <p>These sites are adjacent to ancient woodland. The policies should ensure that any direct or indirect impacts on these sites are avoided or mitigated.</p>	<p>The presence of ancient woodland is listed as key considerations. Appropriate mitigation will be considered as part of the planning application process.</p>

Organisation	Relevant duty to cooperate representations	GBC response
Natural England (2017)	<p><b>Policy A25</b> This site includes an area of Registered Common Land. This is covered by the Commons Act 2006 and will have rights of access by the public which must be considered in the proposed use of the site and may also affect the capacity of the proposed SANG area.</p>	<p>All land designations will need to be taken into account at the planning application stage. The common land covers a very small part of the site and is unlikely to have a significant affect on the deliverability of the site as a whole.</p>
Natural England (2017)	<p><b>Policies A26, A27, A32, A33</b> These sites are within/ within the setting/ within close proximity of the Surrey Hills Area of Outstanding Natural Beauty. We advise the LPA to take into account the relevant Management Plan for the area and should seek the views of the AONB Partnership. Development proposals brought forward through the plan should avoid significant impacts on protected landscapes, including those outside the plan's area and early consideration should be given to the major development tests set out in paragraph 116 of the National Planning Policy Framework (NPPF).</p>	<p>Any development proposals would need to be consistent with Policy P1, which includes the provisions of the AONB Management Plan, and the NPPF in respect of the AONB.</p>
Natural England (2017)	<p><b>Policy A29</b> This site is in very close proximity to the Thames Basin Heaths SPA and therefore must provide an appropriate suite of mitigation to ensure that impacts upon the site are avoided. This is likely to include provision of SANG above the minimum standard of 8 ha per 1,000 persons.</p> <p>This site allocation is in very close proximity to Thursley, Ash, Pirbright and Chobham SAC and Whitmoor Common SSSI. Any direct or indirect impacts on this site should also be avoided or mitigated.</p>	<p>Policy P5 requires provision of appropriate measures to avoid and mitigate impacts on all SPA sites and refers to the standard of 8 ha per 1,000 people as a minimum. The appropriate level of SANG provision can be addressed at the planning application stage. The Infrastructure Delivery Plan indicates that there will be a significant amount of spare SANG capacity available in the west of the borough. Policy ID4 provides protection for SACs.</p>

Organisation	Relevant duty to cooperate representations	GBC response
Office of Rail and Road (2017)	<p><b>Land Disposal</b></p> <p>We note that the Guildford Borough plan/strategy includes making use of land owned by Network Rail. One of ORR’s regulatory controls on Network Rail concerns land disposal, our objective being to protect land that may be required for the future development of the railway network and to prevent the disposal of that land against the public interest. Should Network Rail wish to dispose of land it may need to seek our specific consent in order to comply with its network licence. We expect Network Rail to work closely with Guildford Borough Council and all relevant stakeholders in developing its proposals. Details on our regulatory arrangements can be found at: <a href="http://www.orr.gov.uk/rail/economic-regulation/regulation-of-network-rail/network-licence/land-disposal-policy">http://www.orr.gov.uk/rail/economic-regulation/regulation-of-network-rail/network-licence/land-disposal-policy</a>.</p>	<p>Noted. We have worked closely with Network Rail to understand Network Rail’s ambitions regarding the redevelopment of land it controls.</p> <p>As an example, in agreement with Network Rail, we have made a site allocation as Policy A8 Land west of Guildford railway station for a ‘Guildford platform capacity’ scheme involving additional platforms and layout changes at Guildford railway station as proposed in the Wessex Route Study.</p>
Office of Rail and Road (2017)	<p><b>Station redevelopment etc.</b></p> <p>The Council documents refer to development and platform works at Guildford station together with aspirations for new stations within the locality and improvements on both the Portsmouth Direct and North Downs Lines.</p> <p>There are only two references to Guildford (which are already complete and not the specific schemes listed) in the Enhancements Delivery Plan (EDP) which describes the outputs, scope and milestones for projects and ring fenced funds that Network Rail is committed to deliver in the current control period CP5 (1<sup>st</sup> April 2014 to 31<sup>st</sup> March 2019). Network Rail publishes an updated version of the EDP every quarter. ORR holds Network Rail to account for the delivery of the outputs it has committed to the funders of enhancements; in England and Wales this is typically the Department for Transport (DfT).</p>	<p>Noted.</p> <p>Network Rail considers that the ‘Guildford platform capacity’ scheme is required from Control Period 7 (2024-2029). The scheme is identified in Network Rail’s Wessex Route Study (2015) which proposes a strategy which addresses the challenge of accommodating projections for growth to 2043. The EDP describes Network rail’s commitments in the Control Period 5, the current control period.</p>



Organisation	Relevant duty to cooperate representations	GBC response
	<p>ORR does not present plans for future railway enhancement projects such as these to Parliament (although some are joint Train Operating Companies and Network Rail funded). The current process involves ORR requesting that DfT produce a High Level Output Statement (HLOS) which states what it requires the railway to achieve as a part of the run up to the h [sic] next Periodic Review (PR18) <a href="http://www.orr.gov.uk/rail/economic-regulation/regulation-of-network-rail/price-controls/periodic-review-2018">http://www.orr.gov.uk/rail/economic-regulation/regulation-of-network-rail/price-controls/periodic-review-2018</a>. ORR does not have a role in selecting or, producing appraisals for, candidate schemes.</p> <p>As a response to our recent consultation on the treatment of enhancements DfT has said that its forthcoming HLOS may not include new enhancements schemes this time, with these being dealt with in a separate process outside of PR18.</p> <p>The national rail network controlled by Network Rail is divided into a number of routes, Guildford falls under Wessex.</p> <p>The Wessex Route Study, which sets out the strategic vision for the future of this part of the rail network over the next 30 years and provides options for funders was established in August 2015 contained many of the points raised by the Council , which would have had an opportunity to comment on Network Rail's plans.</p>	<p>Noted.</p> <p>Noted.</p> <p>The Council responded to Network Rail's consultation on the Wessex Route Study Draft for Consultation in February 2015.</p>
Office of Rail and Road (2017)	We have noted that the Council has identified costs but have you received confirmation for funding for these schemes?	<p>The Infrastructure Schedule at Appendix C of the Submission Local Plan sets out the likely costs and funding sources for the key infrastructure requirements including rail schemes.</p> <p>The Submission Local Plan provides the basis for planning for the delivery of and funding for necessary</p>

Organisation	Relevant duty to cooperate representations	GBC response
		<p>infrastructure in a planned coordinated manner across multiple stakeholders, including from developers and Network Rail. It also acknowledges the need to be flexible and respond to changing circumstances. Policy ID1 explains that the Guildford borough Infrastructure Delivery Plan, containing the latest Infrastructure Schedule, 'will be regularly reviewed as further detail becomes available, particularly regarding infrastructure needed to support development later in the plan period'. Policy ID3 at point (8) is similar and also relevant. This acknowledges the fact that the quantum of funding available from non-developer sources is likely to change as government funding regimes change, information is updated, or plans of infrastructure providers are developed further.</p>
<p>Surrey Nature Partnership (2017)</p>	<p><b>Key facts about the borough</b>  At 2.33 you describe the role of the relevant LEP to Guildford Borough (Enterprise M3). For consistency, you might also make early mention of the Surrey Nature Partnership at this point in the document. The Partnership's latest publications might then be referenced here, including Naturally Richer: a Natural Capital Investment Strategy for Surrey (2015) and The State of Surrey's Nature (2017).</p>	<p>Additional wording included as a proposed Minor Modification:  The Surrey Nature Partnership (SyNP) is the designated nature partnership for Surrey. The NPPF requires use to collaborate and consult with the SyNP when drawing up plans. The SyNP has produced Naturally Richer: a Natural Capital Investment Strategy for Surrey (2015) to plan and coordinate investment in the natural environment of Surrey. The State of Surrey's Nature (2017) provides a base-line against which to measure changes in biodiversity and identifies priorities for nature conservation and investment.</p>
<p>Surrey Nature</p>	<p><b>Policy S1</b></p>	

Organisation	Relevant duty to cooperate representations	GBC response
Partnership (2017)	<p>The central purpose of the National Planning Policy Framework is to plan for sustainable future development and economic growth. That sustainability is partly defined as the ability to clearly demonstrate a contribution to protecting and enhancing the natural environment, including to “improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change.” We are pleased therefore to see the environment placed so prominently as one of the four core themes for implementing the Plan’s Spatial Vision for Guildford Borough.</p> <p>With respect to Policy S1: Sustainable development, we also welcome the addition of para. 4.1.2a; “Sustainable development will be achieved by seeking economic, environmental and social gains jointly and simultaneously through the planning system.”</p>	Noted.
Surrey Nature Partnership (2017)	<p><b>Policy P4</b> We welcome and support this policy.</p>	Noted.
Surrey Nature Partnership (2017)	<p><b>Policy P5</b> We welcome and support this policy, and especially the prudent addition of para. 4.3.50a as well as other refinements in this version of the Plan.</p>	Noted.
Surrey Nature Partnership (2017)	<p><b>Policy E5</b> With reference to para 4.4.51a, the Surrey Nature Partnership has been consulted on the development of the Rural Economic Strategy, and has influenced this document’s solid reference to the natural capital investment approach in Guildford Borough.</p>	Noted.
Surrey Nature Partnership	<p><b>Policy E6</b> We welcome and support the clear reference here to the importance</p>	Noted.

<b>Organisation</b>	<b>Relevant duty to cooperate representations</b>	<b>GBC response</b>
(2017)	of Guildford's natural environment to leisure activities and as an attraction to visitors from beyond the Borough.	
Surrey Nature Partnership (2017)	<b>Policy D2</b> We welcome and support this policy, and the importance the Borough places on such matters through its inclusion and prominence in the plan.	Noted.
Surrey Nature Partnership (2017)	<b>Policy D4</b> There may be an opportunity here through the re-drafted policy to link aspirations for achieving a biodiversity net gain with those for high standards in development design.	The requirement for net gains in biodiversity is set out in Policy ID4.
Surrey Nature Partnership (2017)	<b>Policy ID3</b> We welcome and support this policy.	Noted.
Surrey Nature Partnership (2017)	<b>Policy ID4</b> We greatly welcome and support this enlightened policy, especially its references to the Surrey Nature Partnership and its work promoting the recognition of Biodiversity Opportunity Areas in 4.6.34-36 and 4.6.50. Additions at para. 4.6.42a-45 are useful and provide important clarity. With reference to para 4.6.50, we look forward to working with you on the intended Green Infrastructure Supplementary Planning Document, where we can perhaps assist with interpreting the achievement of biodiversity net gain standards within the Borough.	Noted.
Transport for London (2016)	TfL is working to implement the recommendations of the National Infrastructure Commission relating to the delivery of growth associated with Crossrail 2. From a strategic transport perspective, Crossrail 2 would release capacity on rail corridors that are used by	The Infrastructure Schedule includes scheme NR5, which is Portsmouth Direct Line improvements (together with South West Main Line Peak Demand improvements), facilitating increased service frequency.

Organisation	Relevant duty to cooperate representations	GBC response
	<p>trains to/from Guildford and thereby help to support future development within the borough, although Crossrail 2 would not directly serve any stations within Guildford. Explicit support for Crossrail 2 and a recognition of its important contribution to delivering future growth as set out in the Local Plan would be welcomed.</p>	<p>Network Rail's Wessex Route Study (August 2015) proposes a strategy, including "choices for funders" for the Department for Transport to consider, which addresses the challenge of accommodating projections for growth to 2043.</p> <p>Options are set out, including the Crossrail 2 scheme, which in combination would remove the capacity constraint on the South West Main Line between Surbiton and Waterloo and allow for an additional 13 trains per hour peak services forecast to be required by 2043. The Government has subsequently announced funding for the Crossrail 2 scheme in the Budget in March 2016. Schemes to provide grade separation at Woking Junction and an additional through platform at Woking station will also be required.</p>
<p>Transport for London (2017)</p>	<p>Having reviewed the proposed changes, TfL wishes to reinforce the previous comments made as part of last year's consultation. There is an acknowledgement of the important role of Crossrail 2 in the supporting Transport topic paper and transport evidence base although this has not been explicitly recognised in the Local Plan strategy. Inclusion of Crossrail 2 in the Transport topic paper and transport evidence base is welcomed. However, the explanatory text in section 5.25 of the Transport topic paper on rail schemes needs to be updated as follows:</p> <p>'Options are set out, including the Crossrail 2 scheme, which in combination would remove the capacity constraint on the South West Main Line between Surbiton and Waterloo and allow for an</p>	<p>See the Council's response to TfL's 2016 representation as set out above.</p> <p>TfL's suggested amendments to the wording in the Transport topic paper have been made.</p>

Organisation	Relevant duty to cooperate representations	GBC response
	<p>additional 13 trains per hour peak services forecast to be required by 2043. The Government <u>and TfL have</u> subsequently announced funding <u>for the development of Crossrail 2 which is expected to be operational in 2033</u>. Schemes to provide grade separation at Woking Junction and an additional through platform at Woking station will also be required.’ (Emphasis in original.)</p>	

## Appendix 6: Regulation 19 representations from neighbouring councils, including county councils

Council	Relevant duty to cooperate representations	GBC response
<b>COUNTY COUNCILS</b>		
Hampshire County Council (2016)	<p>The Strategic Highway Assessment report acknowledges that it is likely that a reasonable proportion of traffic will travel into the neighbouring borough of Rushmoor. The potential developments set out in the Local Plan have been modelled using Surrey County Council's Strategic Transport Model SINTRAM. The modelling results show that the potential developments could lead to an increase in traffic on roads leading into Hampshire's road network via links such as the A31, A323 and A3011.</p> <p>It is noted that Policy ID3 of the Local Plan (Guildford, 2016) places a requirement on any new developments 'to demonstrate adequate provision to mitigate the likely impacts, including cumulative impacts, of the proposal on both the safe operation and the performance of the Local Road Network and Strategic Road Network'. Hampshire County Council, as a neighbouring Highway Authority would like the to see the wider area incorporated, to include the cross-borough boundary areas such as Hampshire's road network, within this requirement.</p> <p>The County Council would expect to be consulted on any future planning applications as and when it is lodged in relation to the developments in Ash and Tongham, in order to identify the potential impact on Hampshire's Road Network. In addition, it is requested that Hampshire County Council be involved in any discussions aimed at addressing the impacts of any such development.</p>	<p>Policy ID3, as drafted in the Draft Local Plan 2016, stated with respect to the 'provision' that this will 'address impacts in the wider area including across the borough boundary'. Guildford borough borders Rushmoor borough, for which Hampshire County Council is the Local Highway Authority. This wording has been retained.</p> <p>Policy ID3 was amended in the Draft Local Plan 2017 to require, with respect to the provision of mitigation, that 'This mitigation (a) will maintain the safe operation and the performance of the Local Road Networks and the Strategic Road Network to the satisfaction of the relevant highway authorities' – see paragraph (7)(a). Specifically, the term 'Local Road Network' is used in the plural form and the text 'to the satisfaction of the relevant highway authorities' is an addition.</p> <p>Since January 2017, Guildford Borough Council has notified Hampshire County Council of any planning application for 10 units or more in Ash and Tongham.</p>

Council	Relevant duty to cooperate representations	GBC response
Surrey County Council (2016)	<p><b>Economy and infrastructure</b></p> <p>The county council is committed to ensuring Surrey's economy remains strong and to maintaining a high quality of life and well being for Surrey residents through economic development and planned growth underpinned by the timely delivery of supporting infrastructure. This is reflected in current partnership working with boroughs and districts through 'Surrey Future' and on the recent Surrey Infrastructure Study, which aim to help support the delivery of agreed local plan and economic strategy priorities. The vision and strategy outlined by Guildford Borough Council in its Local Plan is considered to be broadly consistent with this policy position.</p>	<p>Noted. We have continued to work in partnership as part of the update to the Surrey Infrastructure Plan 2017 and the updated Guildford borough IDP.</p>
Surrey County Council (2016)	<p><b>Education</b></p> <p>Since the previous consultation on the Draft Local Plan: strategy and sites in July 2014, we have been working with borough council officers under the Duty to Cooperate in order to progress the approach to school provision to support the delivery of Guildford's growth strategy. This liaison is ongoing and both our councils recognise that it is essential to provide additional school places to meet the increased needs that will arise from the new housing proposed in the emerging Local Plan in a sustainable way and in appropriate locations.</p> <p>The county council's role in this process has been to respond to options for school sites, presented by the borough council, in accordance with the objective of meeting the additional educational demands based on the evidence of forecasted need produced by the county council's schools commissioning team. The key criteria for selection were the location of sites, which need to be as close as possible to the residential development they are intended to serve, and the provision of safe and sustainable access for pupils that,</p>	<p>Noted. We have continued this joint working in assessing the changing education needs arising from the planned growth. This is reflected in the latest site allocation requirements which have been informed through SCC's site selection criteria.</p>



Council	Relevant duty to cooperate representations	GBC response
	where possible, enables alternatives to car travel.	
Surrey County Council (2016)	<p><b>Transport</b> County council officers continue to work with borough officers, as well as with Highways England and potential developers, on transport matters. This includes transport impact assessment work and identifying mitigation measures to address the transport impacts of development proposed in the Local Plan.</p> <p>The county council's highway assessment work indicates that the schemes which are included in the Department for Transport's Road Investment Strategy March 2015 and identified in the Infrastructure Schedule (Appendix C) are essential to mitigate the impact of the development proposals set out in the Guildford borough Proposed Submission Local Plan. Without such investment, the cumulative impacts of the new development proposed on the Local Plan's strategic sites on the Strategic Route Network (SRN) could be considered "severe" in the context of the NPPF, as the additional pressure on the SRN is likely to generate safety issues.</p> <p>The Infrastructure Schedule also identifies a number of new transport infrastructure projects. As these projects are developed and further details regarding their land requirements are known, appropriate action will need to be taken to safeguard the land to allow these projects to be implemented.</p> <p>Policy M8 (The Guildford to Cranleigh Movement Corridor) of the existing 2003 Local Plan safeguards the route of the former Cranleigh railway line. While there is little likelihood of this corridor being required for a major alternative piece of infrastructure, such as a light railway, it is nonetheless a vital facility for cyclists and walkers</p>	<p>Noted. We have continued this joint working in assessing the transport impact arising from the planned growth. This is reflected in the latest Appendix C: Infrastructure Schedule and site allocation requirements and opportunities.</p> <p>We anticipate that schemes will be realised within the highway boundary and/or within land controlled by the developer within the site boundary and/or by agreement with third parties.</p> <p>Site allocation policies allocate land for development during a plan period. As the representation makes clear, no development is planned during the plan period.</p> <p>Footpaths and bridleways in Surrey County Council's</p>

Council	Relevant duty to cooperate representations	GBC response
	<p>and will continue to serve that function. Its general quality will need to be maintained and improved where possible, so for this reason it should continue to be safeguarded as a corridor.</p>	<p>Rights of Way network are coincident with most of the section of the Guildford to Cranleigh Movement Corridor within Guildford borough, as defined by the existing 2003 Local Plan.</p> <p>We consider that Surrey County Council's ambition to maintain and improve the Guildford to Cranleigh Movement Corridor within Guildford borough would be best achieved by:</p> <ul style="list-style-type: none"> <li>• The use by Surrey County Council of its power as Local Highway Authority to make an order creating a Right of Way over the A281 Horsham Road to Tannery Lane section of the former railway line which is not presently so designated, or alternatively to enter into an agreement with the landowner to create a Right of Way.</li> <li>• The maintenance and improvement of the relevant Rights of Way by Surrey County Council.</li> </ul>
Surrey County Council (2016)	<p><b>Minerals and Waste Planning</b></p> <p>The county council supports the references to minerals and waste safeguarding and the inclusion of safeguarded areas and sites on the Policies Map. This supports the implementation of policies in the Surrey Waste Plan 2008 (SWP) and the Surrey Minerals Plan 2011 (SMP).</p> <p>The county council seeks to encourage the recycling of construction and demolition waste and the use of recycled aggregate as both minimise the use of valuable land won aggregate. As such, we strongly support Policy D2: Sustainable design, construction and</p>	<p>Noted.</p> <p>Noted.</p>

Council	Relevant duty to cooperate representations	GBC response
	<p>energy.</p> <p>The provision of waste management infrastructure is essential to support a modern economy and needs to be considered alongside housing and employment growth (National Planning Policy for Waste (NPPW) Paragraph 1). It is important, therefore, that the borough council acknowledges in the Plan that waste management facilities are essential infrastructure to support new housing and industry.</p> <p>The Local Plan should acknowledge that many waste management activities fall within the general industrial class in the Use Classes Order and can be considered to be a B1c, B2 or B8 use and can be located within modern, purpose-designed buildings on industrial estates. This accords with SWP Policy WD2, which states that "planning permission for development involving the recycling, storage, transfer, materials recovery and processing of waste will be granted on land that is, or has been used, or is allocated in a Local Plan or DPD or has planning permission for industrial or storage purposes." The SWP specifically identifies a number of urban sites and industrial estates in Guildford borough as being potential areas for accommodating waste management facilities, but this list is not meant to be exhaustive. We would additionally like to see Policy E2 of the Proposed Submission Local Plan under the heading of, "Industrial, warehousing and storage," make reference to the inclusion of suitable waste management facilities to reinforce the principle of directing waste facilities first to industrial/employment sites in urban areas in accordance with SWP Policy CW5.</p>	<p>The Infrastructure Schedule identifies necessary infrastructure to support development and includes at section 8, waste infrastructure.</p> <p>Paragraph 4.4.23a has been added that clarifies that waste management facilities may be appropriate and will be directed to the Industrial Strategic Employment Sites.</p>
Surrey County Council (2016)	<p><b>Our vision and objectives</b></p> <p>To be consistent with the core themes of the plan the sixth paragraph of the vision should be changed to 'Existing high levels of economic</p>	Wording amended as suggested.

Council	Relevant duty to cooperate representations	GBC response
	<p>prosperity will be maintained, supported and <u>enhanced</u> through the protection of commercial premises and the provision of additional sites and premises ...' This would be consistent with strategic objective 8 and the economy policies (section 4.4) which set out policies for a more flexible approach to the change of use of locations outside town centre and key existing employment locations to ensure existing and future economic demand is accommodated.</p>	
<p>Surrey County Council (2016)</p>	<p><b>Section 4.4 Economy Policies</b>  We support the introduction to the economy policies which succinctly set out the role of Guildford's economy and note that it continues to perform well but there are signs that it could lose its competitiveness to other locations. This section clearly sets out the role of the university and the research park. In our comments on the draft Local Plan (July 2014) we stated that it would be helpful if the supporting text were to include more detailed explanation of what the LEP is and how it operates, that the reference to the role of Guildford as a Growth Town in the LEP's Strategic Economic Plan could be expanded and that the submission version of the Plan could contain information about the recent Growth Deal projects for the area. We feel that the supporting text should be expanded to include reference to these points.</p>	<p>Additional wording regarding LEPs has been added to Policy E1 Introduction. Additional wording in relation to Guildford being a Growth Town is included as a proposed Minor Modification.</p>
<p>Surrey County Council (2016)</p>	<p><b>Policies E1 – E3</b>  We support these policies. We note the requirement for the provision of between 37,000 and 47,000 sq m of floorspace for B1a and B1b uses and between 4.7 and 5.3 ha land for B1c, B2 and B8 use classes and the designation of seventeen Strategic Employment Sites which will be protected for employment uses. We note that sufficient land has not been identified within the urban area to meet the employment land requirements so it has been necessary to</p>	<p>Noted.</p>

Council	Relevant duty to cooperate representations	GBC response
	<p>allocate new employment sites. We support the policy for new floorspace to be directed first to Guildford town centre, then to locations within 500m of a public transport interchange and then to Office and Research and Development Strategic Employment Sites. This flexible approach should help ensure existing and future demand is accommodated.</p> <p>We would however be concerned about the delivery of the economy policies if one or more of the key development sites for employment use were not able to proceed due to transport or other reasons. Policy A25: Gosden Hill Farm, policy A26: Blackwell Farm and policy A35: Land at former Wisley airfield are all important for meeting employment needs.</p>	<p>At this stage, the evidence supporting the Local Plan suggests that the sites are deliverable in the plan period and that transport should not constrain the delivery. However, more detailed transport assessments will be required.</p> <p>The Local Plan will be carefully monitored and if the employment floorspace needed is not being delivered, a review of the Local Plan will be required.</p>
Surrey County Council (2016)	<p><b>Policy E2</b></p> <p>Reference should be made to the inclusion of suitable waste management facilities as this would reinforce the principle of directing waste facilities first to industrial/employment sites in urban areas in accordance with Policy CW5 of the Surrey Waste Plan 2008 (SWP) which sets out sequential principles for the location of waste management facilities and Policy CW5 which states that "planning permission for development involving the recycling, storage, transfer, materials recovery and processing of waste will be granted on land that is, or has been used, or is allocated in a Local Plan or DPD or has planning permission for industrial or storage purposes". This is particularly relevant to Policy E2, where inclusion of suitable waste management facilities under the heading "Industrial warehousing and storage" would reinforce the SWP principle of directing waste</p>	<p>Paragraph 4.4.23a has been added that clarifies that waste management facilities may be appropriate and will be directed to the Industrial Strategic Employment Sites.</p>

Council	Relevant duty to cooperate representations	GBC response
	facilities first to industrial/employment sites in urban areas.	
Surrey County Council (2016)	<p><b>Policy E4</b> As stated in the supporting text, the original outline planning permission for the Surrey Research Park includes a restriction limiting use to “research that is complimentary to the activities of the University of Surrey.” To monitor this policy there is a need to include the definition of this term from the original outline planning permission or to define what ‘complementary to the activities of the University of Surrey’ means in terms of Standard Industrial Classification (SIC) Codes.</p>	The University support this policy and will therefore play a part in ensuring that new development is consistent with its aims. For monitoring purposes, the extent to which it is considered complementary to the activities of the University will be assessed on a case by case basis.
Surrey County Council (2016)	<p><b>Policy D3</b> We suggest that the section on the historic environment would be better placed within the "Protecting" section, rather than within the "Design" section as heritage management shares many common objectives and practices with other environmental protection policies.</p> <p>Policy D8 mentions support for "development of the highest design quality". We consider that this needs to be more clearly defined. Assessment of design quality and aesthetic appeal is of course highly subjective, but we would nevertheless recommend that at least some parameters for outlining a definition for "high quality" would be helpful in the implementation of this policy and suggest that this should be set out either in the supporting text or in an appendix. A possible approach could be for, "highest quality" to be required to satisfy the relevant "architectural interest" requirements that are commonly assessed as part of the Listing process for historic buildings (set out in "Principles of Selection for Listing Buildings", DCMS, 2010).</p>	<p>It is considered that this policy is appropriately placed in the 'design' section of the local plan; it is a more proactive policy and goes beyond just protecting heritage assets.</p> <p>Policy D4 on character and design of new development has been expanded significantly to address high quality design in new developments. The reasoned justification (paragraph 4.5.49a) also expands upon design expectations and clarifies that ‘these design considerations will be set out in more detail in Local Plan Development Management Policies Document.</p>

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	<p>The "Monitoring Indicators" table outlines that a "heritage asset register" is necessary: The Historic Environment Record can provide much of the necessary data which will be required to compile this and our Heritage Team would welcome the opportunity to assist.</p>	<p>Noted.</p>
<p>Surrey County Council (2016)</p>	<p><b>Policy ID1</b> Paragraph 4.6.9 - we suggest this should be amended to "Developers will fund and deliver some infrastructure themselves..." rather than "Infrastructure providers will fund and deliver..."</p>	<p>This paragraph has been deleted. The infrastructure schedule, which will be updated in future updates to the IDP, sets out who the delivery agent it and likely funding sources.</p>
<p>Surrey County Council (2016)</p>	<p><b>Policy ID4</b> Paragraph 4.6.38 - this refers to "public" open space and yet the designation includes school playing fields to which public access is restricted.</p> <p>Policy ID4 seeks to protect open space from development in accordance with the NPPF. However, whilst NPPF paragraph 74 states that existing playing fields should not be built on, paragraph 72, requires local planning authorities to give great weight to the need to expand schools. We accept the need to protect school playing fields, however, this should be more clearly balanced against the need for education facilities. Policy R5 in the 2003 Guildford Local Plan included an exception for school playing fields "where the proposed new development meets a legitimate educational need that is appropriately met on the site." We would like to see a similar exception included in Policy ID4 Green and Blue Infrastructure, particularly given that a number of school expansions are identified in the Plan's Infrastructure Schedule as needed to deliver the Plan. It should be noted that permission for school expansion schemes that will significantly impact on school playing fields is only very rarely sought by the county council as a last resort and such proposals</p>	<p>The word "public" has been deleted and reference is made to the definition of open space as set out in the NPPF.</p> <p>A new paragraph was added to the supporting text of policy ID4 in the 2017 version of the plan: "4.6.49a National planning policy requires great weight to be given to the need to create, expand or alter schools to meet the needs of existing and proposed communities. This will be taken into consideration if development is proposed on open space and the development meets a legitimate educational need that is appropriately met on the site."</p>

Council	Relevant duty to cooperate representations	GBC response
	require approval from the Secretary of State.	
Surrey County Council (2016)	<p><b>Policy A3</b> The access should be from The Mount for refuse and removal/service vehicles only, although it is recognised that this would have significant impact in terms of tree cover, gradients, and the need to remove much of the existing wall on the north side of the carriageway.</p> <p>If the site were to be car free (which Surrey County Council supports), and given that there is currently no vehicular access to the A31, it is not apparent what improvements/ or re-build of Farnham Road Bridge the development should be liable for. Land may be required for a re-build of Farnham Road Bridge and this might need to be secured from the site.</p>	<p>Access from Ranger House considered to be a more appropriate access.</p> <p>Potential re-build of Farnham Road bridge moved to opportunity section as although this will be a car-free site access will be required for refuse vehicles and should Farnham Road Bridge be re-built there would be potential access arrangements that would interact with this site.</p>
Surrey County Council (2016)	<p><b>Policy A4</b> This site would provide an excellent opportunity for use as a bus station, being mid way between Waitrose, the expanded North Street site, and North Street.</p>	Site removed from the plan as not deliverable over plan period.
Surrey County Council (2016)	<p><b>Policy A6</b> Bus Interchange - The principle of re-locating the bus station/ provision of an interchange elsewhere in the town, has not yet been established through the current study which has not yet reported.</p> <p>Transport – We would like to see included as a separate bullet point, “Full assessment, and implementation of mitigation measures to accommodate the increased travel demand from the development, and changes to the town centre network for private traffic, deliveries, and buses.”</p>	<p>The site allocation wording is flexible given the solution has not yet been determined or agreed.</p> <p>Have included the separate bullet point but not included the wording ‘Full assessment and implementation of’ as this would be expected of all developments generating significant traffic movements and is covered in other policies.</p>



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	<p>Assessments - There is a need to include a separate bullet point, "Transport."</p> <p>Key Considerations - There is a need to include "Transport/infrastructure" as a separate bullet point.</p>	<p>Not considered necessary as covered by other policies.</p> <p>Not considered necessary as covered by other policies.</p>
Surrey County Council (2016)	<p><b>Policy A8</b> Under "Opportunities" we would like to see included "Provision of a bus / rail interchange on the west side of the railway clear of Guildford Park Road, with other limited facilities"</p>	The opportunity has been added.
Surrey County Council (2016)	<p><b>Policy A9</b> Under "Opportunities" we would like to see included "Potential facilitation of/ contribution to Sustainable Movement Corridor"</p>	The opportunity has been added.
Surrey County Council (2016)	<p><b>Policy A10</b> In the 2003 Local Plan under Policy M7 (Access from Walnut Tree Close to Guildford Station) a scheme involved the Safeguarding of part of Walnut Tree Close. This no longer needs safeguarding for the reasons envisaged. However, some of the safeguarded land comprising the West/East alignment of the corridor may be needed for future operational purposes, for whatever schemes goes forward in this area.</p>	<p>Policy M7 in the 2003 Local Plan is proposed to be a superseded policy as shown in Appendix E of the Draft Local Plan 2016 and in subsequent versions of the Draft Local Plan.</p> <p>A small amount of the land allocated for Policy M7 in the 2003 Local Plan, as it crosses the Yorkie's Bridge access road, is part of the site allocated by Policy A10 which is to be used for the Sustainable Movement Corridor: Town Centre Phase 2 scheme (scheme reference SMC4).</p>
Surrey County Council (2016)	<p><b>Policy A11</b> Under "Requirements", we would like to see included within the</p>	Requirement (4) added.

Council	Relevant duty to cooperate representations	GBC response
	<p>second bullet point: “Potential route for the Sustainable Movement corridor”.</p>	
<p>Surrey County Council (2016)</p>	<p><b>Policy A24</b>  There is no direct, or indirect reference to Clay Lane under this policy, even the southern element, which uses a substantial part of this site. Even though SARP may not be reliant upon the full link road going through, the northern part of the allocated site does include the southern network of roads/ roundabouts forming the Phase 1 of the Clay Lane scheme.</p> <p>Under “Requirements, it may be appropriate to refer to the need to provide permeability for pedestrians and cyclists into and from the development, especially from the existing urban fabric of Guildford, in accordance with the Sustainable Movement Corridor scheme objectives. This could be referenced in the context of a justification for the developer contribution referred to under the third bullet point.</p> <p>Surrey County Council’s education assessment finds that development of this site will require a new primary school. It is assumed that this is not referenced in Policy A24 because it is considered that Weyfield Primary School would be expanded to meet the need generated by the new development, given the proximity of the existing school to the site. This would be the preferred option, rather than building a new school which would compete with Weyfield. The school would need to expand by 1-2 forms of entry and a decision to take this option forward is dependent on the outcome of detailed feasibility studies that are being undertaken. If</p>	<p><u>Clay Lane link road</u>  Requirement (1) refers to “Interventions will be required which address the potential highway performance issues which could otherwise result from the development, including on the A320 Woking Road.” This broad requirement allows the policy to be focused on the required outcomes necessary to deliver the site.</p> <p><u>Sustainable Movement Corridor</u>  Reference added to requirement (3): “Developer to provide northern route section of Sustainable Movement Corridor on the site and make necessary and proportionate contribution to delivering the northern route section on the Local Road Network, <u>both having regard to the Sustainable Movement Corridor Supplementary Planning Document</u>”.</p> <p>Policy requirement now includes: (4) Appropriate financial contribution to enable expansion of Weyfield Primary Academy by additional 1FE – 2FE</p>

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	<p>these find that it is not feasible to expand the school, additional land might be required to be allocated within the SARP area, in addition to a developer contribution. This reflects discussions between officers of our councils.</p> <p>In the table headed Description under key considerations, the fact that some 11 ha of the site is allocated for waste management purposes in the Development Plan for the area (under Policy WD2 of the SWP) should be specifically acknowledged.</p> <p>Under allocation we would like to see clarification by stating: New or enhanced waste management facilities including the following facilities:</p> <ul style="list-style-type: none"> <li>• Waste transfer station</li> <li>• Community recycling centre</li> <li>• Sewage treatment works</li> </ul>	<p>The allocation of this site in the Surrey Waste Plan is now referenced in the Key considerations and the allocation has been clarified further.</p>
Surrey County Council (2016)	<p><b>Policy A25</b></p> <p>Under “Requirements”, a bullet point should be included under the heading, “Infrastructure” requiring the provision for extended/new bus services to provide seamless connectivity between the site, the existing eastern suburbs of Guildford, and the town centre (as well as any through journeys that can be provided in the future to the western fringes of the town), unless this will be adequately met by the Sustainable Movement Corridor.</p> <p>In addition, it may be appropriate to refer to the need to provide permeability for pedestrians and cyclists into and from the development, especially from the existing urban fabric of Guildford.</p>	<p><i>Changes made to the policy in the Draft Local Plan 2017:</i></p> <p>New requirement added, numbered (5), for a significant bus network to serve the site and key destinations including the existing eastern suburbs of Guildford and the town centre.</p> <p>New requirement added, numbered (6), to provide permeability for pedestrians and cyclists into and from the development, especially from the urban area of Guildford.</p>

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	<p>To ensure consistency throughout the document, change wording relating to primary schools to accord with the format of Policy A26 Blackwell Farm and Policy A35 Wisley.</p> <p>Under “Allocation”, within the penultimate bullet point, we would like to see the wording “potentially as a through school” deleted as the organisation of the school will be decided at a later stage.</p> <p>Under “Requirements,” Infrastructure, we consider that the secondary school site provision should be dealt with under a separate bullet point. Reference should be made under the new bullet point to the dual use of the playing fields which are essential for the school. It should be stated that ownership of the playing fields will be made over to the school and the dual use will be managed by the school according to an appropriate legal deed of covenant.</p> <p>It would be useful for us to know where the playing fields are to be located.</p>	<p>Wording in relation to primary schools now consistent between allocations.</p> <p>Deleted reference to the potential for a through school.</p> <p>Policy requirement now includes: The associated off site playing fields must be dual use and secured through the planning application process.</p> <p>Appendix C: infrastructure schedule states: (SED1) To be located a short walk from the proposed Park and Ride.</p>
Surrey County Council (2016)	<p><b>Policy A26</b></p> <p>The reference to the A31/Down Place access as being the Primary Access should be changed in the column headed “Allocation”, final bullet point, and in the column headed “Requirements,” first and third bullet points. Further assessment work needs to be undertaken to determine the appropriate access strategy. Within a sustainable urban extension, we would want to encourage Guildford town bound movements to be by non-car modes. Whilst the Down Place access provides for vehicular access to the West, towards Winchester, southbound on the A3, to Portsmouth via Down Lane, and eastwards</p>	<p>The requirement numbered (1) has been amended to remove the distinction between primary and secondary vehicular accesses.</p>

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	<p>into Guildford town, we would expect A3 London/M25/ east Guildford/Woking traffic, to use the A3 Egerton Road access.</p> <p>We would further suggest that the Site Allocation plan on page 185 should include the land necessary to provide the access link to the east (i.e. into Egerton Road). According to the current plan, the site is isolated from the east, especially given that the Ancient Woodland provides a barrier between the site and the urban fabric of West Guildford.</p> <p>Under “Requirements,” fourth bullet point, reference to the need to manage this through-link should also be included in the text.</p> <p>Under “Requirements,” A bullet point should be considered for inclusion under the heading, “Infrastructure,” requiring the provision for extended/new bus services to provide seamless connectivity between the site; the existing western suburbs of Guildford; the town centre and also any through journeys that can be provided in the future to the eastern fringes of the town. Whilst the provision of the Sustainable Movement Corridor might be considered sufficient, other bus services and routes into the development might also be needed.</p> <p>Also under “Requirements,” it might be appropriate to refer to the need to provide permeability for pedestrians and cyclists into and from the development, especially from the urban area of Guildford.</p>	<p>It is not considered necessary to include the land necessary to provide the access link to the east within the site allocation area. Instead this is a requirement within the policy.</p> <p>Control of the through link has been included in the requirement numbered (3).</p> <p>A new requirement numbered (5) has been added with respect to the provision of a significant bus network.</p> <p>A new requirement (6) has been added with respect to the provision of permeability for pedestrians and cyclists.</p>
Surrey County Council (2016)	<p><b>Policy A29</b></p> <p>Under “Requirements,” given the volume of potential new homes, an additional bullet should be included which refers to the existing substandard junction of White Lane with A31 Hogs Back needing to be either improved or closed. Also, the current gap in the central</p>	<p>The Infrastructure Schedule at Appendix C includes scheme LRN16 – A31 Hog’s Back (Tongham to Puttenham) road safety scheme. This is a key infrastructure requirement on which the delivery of the</p>

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	reservation which requires traffic turning into Ash Green from the East to cross the eastbound A31 traffic is inappropriate for any material increase in traffic.	plan depends. The junction of White Lane with the A31 Hog's Back will be reviewed in the development of this scheme.
Surrey County Council (2016)	<p><b>Policy A32</b> Under "Requirements," an additional bullet should be included to read: "Close rear access to Sandy Lane for vehicular use."</p>	<p>The Council does not consider that this suggested requirement is necessary for this site.</p> <p>The initial information provided by the promoter of the site suggests that there will be a reduction in traffic impact on Sandy Lane compared to the existing use.</p> <p>This matter could be considered further as part of a Transport Assessment at planning application stage and if, at that stage, it is deemed necessary, then access to Sandy Lane could be restricted in order to maintain the safe operation and performance of the Local Road Network to the satisfaction of Surrey County Council as the Local Highway Authority. This would be consistent with Policy ID3 at point (7) in the Draft Local Plan 2017.</p>
Surrey County Council (2016)	<p><b>Policy A35</b> There are no significant implications in terms of the safeguarding of mineral resources. The proposed new settlement at the former Wisley Airfield (A35) is located within a minerals safeguarding area but it is considered very unlikely that the underlying sharp sand and gravel resource will be worked in future. Nevertheless, should the site be allocated in the Local Plan, the applicant should be required to investigate the potential for prior working before any planning application being submitted.</p>	Its location in a minerals safeguarding area has been added to the policy under key considerations.

Council	Relevant duty to cooperate representations	GBC response
	<p>More detail is required in the column headed, "Requirements" regarding the potential interventions that will be required to address issues on B2215 Ripley High Street. This comprises two slip roads at A247 Send. If the land necessary for these has now been secured, is presumed that there will not be a problem in linking these to Wisley.</p> <p>An issue of concern for the county council which is not resolved in this version of the Local Plan relates to the potential loss of the allocated waste management site at the former airfield at Wisley. In our response, dated 18 September 2014, to the consultation on the previous Draft Local Plan, we pointed to the SWP allocation of the former airfield for waste management use and also an existing planning permission for a waste management facility. The proposals for Wisley effectively prejudice the implementation of Surrey's waste strategy as set out in the SWP. We therefore object to this proposed policy and consider the Plan to be unsound in terms of being positively prepared in that it does not take account of the acknowledged requirement for waste management facilities and the SWP allocation.</p> <p>Some 17 ha is allocated for waste management use under Policies WD2 &amp; WD5 of the SWP and is also considered suitable for aggregate recycling. The proposed allocation contains no specific waste use allocation other than an allocation for general industrial purposes which could in principle include some suitable, but smaller scale, waste uses (see below).</p> <p>The county council would wish to see part of the site continue to be allocated specifically for waste management purposes (the county council acknowledges that much less than 17 ha would be required</p>	<p>A new requirement (numbered 4) has been added in the Draft Local Plan 2017: 'The identified mitigation to address the impacts on Ripley High Street and surrounding rural roads comprises two new slip roads at A247 Clandon Road (Burnt Common) and associated traffic management'.</p> <p>Surrey County Council is currently in the process of reviewing the Surrey Waste Plan. Surrey County Council carried out an 'Issues and Options' consultation and a 'Call for Sites' in 2016. We understand that this site is no longer available for waste uses and Surrey County Council has confirmed that there is currently no justification or intention to compulsory purchase the site for waste uses. Furthermore, this site has now been excluded as a proposed site for the delivery of waste management infrastructure at the preliminary sieving stage as part of the Draft Surrey Waste Local Plan (October 2017), which is being consulted upon and is intended to replace the Surrey Waste Plan (2008). We therefore do not expect this site to be safeguarded in the new Waste Plan.</p> <p>The promoter of former Wisley airfield has indicated that they intend to reuse the aggregates that exist on part of the site in the form of the former runway as part of their development. This will help minimise the level of construction related vehicle movements that is required to and from the site. We continue to work with Surrey County Council in relation to its Minerals and Waste planning function.</p>

Council	Relevant duty to cooperate representations	GBC response
	<p>for waste management purposes - perhaps of the order of 5 ha including any necessary environmental buffer). Therefore as waste planning authority, we object to this proposed policy as it involves the loss of this waste management site and is therefore contrary to SWP 2008 Policies WD2 and WD5 and government policy contained in the NPPW. We consider the Plan to be unsound in terms of being positively prepared in that it does not take account of this acknowledged requirement for waste management facilities and the SWP allocation.</p> <p>In view of the ongoing need for additional waste management capacity in Surrey, including for the recycling of construction and demolition waste, the proposal would prejudice the successful implementation of the SWP by reducing land availability for such uses and limiting flexibility to make adequate strategic provision. As such it will fetter the implementation of the waste hierarchy and undermine the targets included in SMP Core Strategy Policy MC5 for the production of alternative aggregates in Surrey.</p> <p>The county council is currently in the early stages of preparing a new waste plan that will consider the need for new waste management capacity in the county.</p> <p>It should be noted that the wording relating to primary school provision in policies A25, A26 and A35 is not consistent.</p>	<p>The wording has been amended to be consistent across the strategic site policies.</p>
Surrey County Council (2016)	<p><b>Policy A43</b> Under the column headed "Requirements," please add the following bullet points: 1) "Main vehicular access via a new roundabout on A247 frontage, to also provide fourth arm for proposed A3 on slip."</p>	<p>The Council recommends that the following minor amendments are made to the plan by amending requirement (5) and adding a requirement (6) as follows: (5) Design and site layout to take full account of Policy</p>



Council	Relevant duty to cooperate representations	GBC response
	2) "Permeability/ connectivity for pedestrians/ cyclists to B2215 Portsmouth Road."	A43a, including main vehicular access to the site being provided on the A247 frontage  <u>(6) Provide permeability for pedestrians and cyclists to the B2215 Portsmouth Road.</u>
Surrey County Council (2016)	<b>Policy A43a</b> The site edging should probably be extended to provide the necessary land, including highway land, required for roundabouts on either side of the A3.	Site area amended based on the work done to support the option agreement.
Surrey County Council (2016)	<b>Policy A44</b> Under the column headed "Requirements," please include the following bullet point: "The junction of Send Hill with Potters Lane needs improving to provide improved visibility."	This has been included as a requirement (10).
Surrey County Council (2016)	<b>Policy A46</b> We note that the site was proposed to be removed from the green belt and safeguarded for potential future development in the previous draft Local Plan. The current version proposes to bring this site forward for development in this plan period to meet Guildford's housing needs. Given this position and in the context of our forecast needs for additional school places over the plan period, required to support the proposed new housing to the west of Guildford, it is our view that the option to locate a secondary school here is acceptable, provided that the scale of housing proposed on this site is delivered to meet the need identified in the plan. This would also help to meet sustainable transport objectives, particularly if the scale of housing supports the delivery of the rail connectivity proposals and the station improvements.	An alternative school is now proposed on Blackwell Farm. Surrey County Council is supportive of this alternative school location. The exceptional circumstances that justified Normandy and Felxford are no longer there. This is discussed in further detail in the Housing Delivery topic paper.

<b>Council</b>	<b>Relevant duty to cooperate representations</b>	<b>GBC response</b>
Surrey County Council (2016)	<p><b>Appendix C Infrastructure Schedule</b>  <b>Strategic Road Network - SRN4, SRN9, SRN10</b>  For those elements of infrastructure that are entirely the responsibility of a given developer, Surrey County Council should be deleted from the "Delivered by" column.</p>	Wording has been deleted as suggested.
Surrey County Council (2016)	<p><b>Appendix C Infrastructure Schedule</b>  <b>Local Road Network – LRN3</b>  The new signalised junction from Blackwell Farm site to A31 Farnham Road, would be a Section 278 Agreement, delivered in its entirety by the developer. Surrey County Council should be deleted from the "Delivered by" column.</p>	Wording has been deleted as suggested.
Surrey County Council (2016)	<p><b>Appendix C Infrastructure Schedule</b>  <b>Local Road Network – re LRN3, LRN4, LRN5, LRN6, LRN7, LRN8</b>  For those elements of infrastructure that are entirely the responsibility of a given developer, Surrey County Council should be deleted from the "Delivered by" column.</p>	Wording has been deleted as suggested.
Surrey County Council (2016)	<p><b>Appendix C Infrastructure Schedule</b>  <b>Bus Transport - BT2</b>  Surrey County Council should be deleted from the "Delivered by" column.</p> <p>We suggest the inclusion two additional BT infrastructure entries relating to the need to provide significant bus networks serving the two east and west urban extensions.</p>	<p>Wording has been deleted as suggested.</p> <p>Schemes BT5 and BT6 serving Gosden Hill Farm and Blackwell Farm sites have been added.</p>
Surrey County Council (2016)	<p><b>Appendix C Infrastructure Schedule</b>  <b>Active Modes</b>  We suggest the inclusion of two additional AM infrastructure entries</p>	A new requirement to 'Provide permeability for

Council	Relevant duty to cooperate representations	GBC response
	relating to the need to provide significant cycle and pedestrian permeability improvements linking these extensions into the existing urban fabric.	pedestrians and cyclists into and from the development, especially from the urban area of Guildford' has been added to policies A25 and A26, for Gosden Hill Farm and Blackwell Farm sites respectively, numbered (6) in both site policies. Further, Policy ID3 has been strengthened in respect of the requirements for the provision of walking and cycling routes – see Policy ID3, point (2).
Surrey County Council (2016)	<p><b>Appendix C Infrastructure Schedule</b>  <b>Open Space</b>            We do not consider it appropriate to deal with school playing fields under Open Space. Public access to the playing fields at Gosden Hill will need to be controlled for security and operational reasons.</p>	Open Space does not need to have full public access and can be designated on land used for private sports and recreation and land that has public value for visual amenity. It is considered that school playing fields can therefore be dealt with as Open Space.
Surrey County Council (2016)	<p><b>Appendix C Infrastructure Schedule</b>  <b>PED Primary Schools - PED1</b>            Re Expansion of Wyke Primary School by 1 additional FE, please add: “or relocation of the school onto the strategic site”</p>	This infrastructure project has been deleted as it was to serve site allocation A46 which has been removed from the plan.
Surrey County Council (2016)	<p><b>Appendix C Infrastructure Schedule</b>  <b>PED Primary Schools - PED6</b>            Re Ash Grange in the column headed “Delivered when” delete from years “0-5” to Years and add “1–10”</p>	This has been amended as suggested.
Surrey County Council (2016)	<p><b>Appendix C Infrastructure Schedule</b>  <b>SED Secondary Schools - SED1</b>            Under the column headed “Infrastructure Type Infrastructure Project”, the reference in the first sentence to “maximum 6 FE” needs</p>	The maximum 6FE (and by virtue of this the opportunity to include up to 7FE) has been deleted as this would

Council	Relevant duty to cooperate representations	GBC response
	<p>to be amended to state: “up to 7 FE”.</p> <p>To be consistent with the other entries, in the column headed “likely cost and funding source,” please delete: “Developer contributions (from other sites) to fund building”.</p> <p>It is suggested that wording is added to say that the shared community use of the school playing fields will be secured by a legal agreement.</p>	<p>only be required should the school at Wisley not come forward. The plan is written on the basis that both sites and both schools are delivered. Should one site fall away then the plan would need to be amended to respond to this.</p> <p>Wording has been deleted as suggested.</p> <p>Dual use included in site allocation policy for Blackwell, Gosden and Wisley.</p>
Surrey County Council (2016)	<p><b>Appendix C Infrastructure Schedule SED Secondary Schools - SED2</b></p> <p>Under the column headed Infrastructure Type Infrastructure Project, please remove the words: “(to age 16)” to facilitate flexibility for future provision.</p> <p>In the column headed “likely cost and funding source” please amend the first entry to read: “Developer to provide serviced land at nil cost and transfer it to SCC.”</p>	<p>Wording has been deleted as suggested.</p> <p>Wording amended as suggested.</p>
Surrey County Council (2016)	<p><b>Appendix C Infrastructure Schedule SED Secondary Schools - SED3</b></p> <p>In the column headed “Infrastructure Type Infrastructure Project”, the reference in the first sentence to an “A 7- form entry (7FE) secondary school” needs to be amended to “up to 8 FE to” be consistent with the penultimate bullet point under “Allocation” in Policy A46.</p>	<p>This is no longer relevant as site allocation A46 has been removed from the plan.</p>

Council	Relevant duty to cooperate representations	GBC response
	<p>In the column headed “likely cost and funding source”, after the words “...including Blackwell Farm strategic site” we would suggest that the following words are added: “and the site allocation comprising land to the South and East of Ash and Tongham.”</p> <p>In the column headed “likely cost and funding source”, please amend the first entry to read: “Developer to provide serviced land at nil cost and transfer it to SCC.”</p>	<p>This is no longer relevant as site allocation A46 has been removed from the plan and the secondary education needs for children in ash and Tongham is being met through the new infrastructure project SED5.</p> <p>Wording amended as suggested.</p>
Surrey County Council (2017)	<p><b>Vision and ambition</b> We generally welcome the changes that have been made to the vision to ensure that it is consistent with the strategic objectives.</p>	Noted.
Surrey County Council (2017)	<p><b>Section 4.4 Economy Policies</b> We welcome the additional text setting out the role of the LEP. Further information could be included referring to the role of Guildford as a Growth Town in the LEP’s Strategic Economic Plan.</p>	Noted. Additional wording in relation to Guildford being a Growth Town is included as a proposed Minor Modification.
Surrey County Council (2017)	<p><b>Policies E1 – E3</b> We note that the required provision of new office and research &amp; development floorspace and industrial land has been revised based on the updated Employment Land Needs Assessment and that three additional strategic employment sites have been designated. We support this robust analysis and these policies. We would however still be concerned about the delivery of the economy policies if one or more of the key development sites for employment use were not able to proceed due to transport or other reasons.</p>	<p>At this stage, the evidence supporting the Local Plan suggests that the sites are deliverable in the plan period and that transport should not constrain the delivery. However, more detailed transport assessments will be required.</p> <p>The Local Plan will be carefully monitored and if the employment floorspace needed is not being delivered, a review of the Local Plan will be required.</p>

<b>Council</b>	<b>Relevant duty to cooperate representations</b>	<b>GBC response</b>
Surrey County Council (2017)	<p><b>Policy E4</b></p> <p>To monitor this policy we would still argue that a definition needs to be included on research that is complimentary to the activities of the University of Surrey based on the original outline planning permission or defined in terms of Standard Industrial Classification Codes.</p>	<p>The University support this policy and will therefore play a part in ensuring that new development is consistent with its aims. For monitoring purposes, the extent to which it is considered complementary to the activities of the University will be assessed on a case by case basis.</p>
Surrey County Council (2017)	<p><b>Policy A26</b></p> <p>We note that the Normandy and Flexford site, which included provision for housing and a new secondary school to serve the west of the borough has been removed from the draft Local Plan. Consequently, we welcome the amendment to Policy A26 which provides for a secondary school within the proposed urban extension at Blackwell Farm. The school is required to meet the county council's forecasted future need, on the assumption that the development proposed in the Local Plan comes forward. We would like additionally to see it specified that the school is required to be located in the northern part of the site. This is considered to be the most sustainable location in accessibility terms and it would be in accordance with the amendment to SED3.</p>	<p>Minor amendments to wording in Infrastructure Schedule at SED3 and Policy A26 to address locational concerns are proposed as Minor Modifications. The preferred, sustainable location is, however, proposed to be articulated in a manner that relates to accessibility from the existing urban area and by public transport, rather than indicating "northern part of the site".</p>
Surrey County Council (2017)	<p><b>Policy A29</b></p> <p>We welcome the amendment to this policy which currently states that an appropriate financial contribution is required to enable expansion of Ash Manor Secondary School by additional 1FE. It is felt that this should read "contributions" (plural) as it is likely more than one contribution will be sought towards the costs of the expansion.</p>	<p>Noted. Amended wording is included as a proposed Minor Modification.</p>
Surrey County Council (2017)	<p><b>Appendix C Infrastructure Schedule</b></p> <p><b>SED Secondary Schools - SED3</b></p> <p>We welcome the amendments made to SED3 for the reasons stated</p>	<p>Noted.</p>

Council	Relevant duty to cooperate representations	GBC response
	above and we support the specification for the school to be located to the north of the site.	
<b>NEIGHBOURING BOROUGH AND DISTRICTS</b>		
Elmbridge Borough Council (2016)	<p><b>General</b></p> <p>As you know, we are keen to work with you and other authorities within our respective Housing Market Areas to seek to meet needs across the wider area, ensuring the best and most suitable sites are brought forward for development and, that other cross-boundary and strategic planning matters are continuously addressed.</p> <p>In responding to this latest consultation, we note that a number of the points we previously raised have been addressed. This consultation response therefore focuses on outstanding matters and those which have arisen from examining newly published and updated evidence base documents.</p>	Noted.
Elmbridge Borough Council (2016)	<p><b>Green Belt</b></p> <p><u>Green Belt &amp; Countryside Study</u></p> <p>As part of the Draft Local Plan consultation the Council expressed concern regarding the transparency of the study and the subsequent methodology and assumptions for the appraisal of sites. Following the inspection of the Draft Local Plan; Topic Paper: Green Belt and the Countryside; and the Volume II Addendum, the Council welcomes the reconsideration of Green Belt as a constraint and the weight applied to the strength of each individual Green Belt parcel and how this has influenced the assessment of Potential Development Areas. The Council considers therefore that its concern regarding the process of applying the weight of the Green Belt parcels to have been addressed.</p>	Noted. As set out in the Green Belt and Countryside topic paper, whilst the sensitivity of Green Belt has been used as a starting point, we have nevertheless had to consider the merits of individual sites and whether there are exceptional circumstances that warrant allocating them for development.

Council	Relevant duty to cooperate representations	GBC response
	<p>Nevertheless, the Council remains concerned that the original study and subsequent updates made since the Draft Local Plan consultation, make no attempt to address the strategic significance of the Green Belt across the wider area and its fundamental aim in preventing the sprawl of London. We feel it is essential that any study seeks to address this issue and that Guildford Borough Council works with surrounding Housing Market Areas (HMAs) in doing so. If we have missed this consideration amongst the evidence base documentation, we would be grateful if this is signposted.</p> <p>In addition, we note a number of instances where development sites adjoin or are close to borough boundaries e.g. Land at Former Wisley Airfield. We are sure that it is appreciated that it will be important to work with the relevant boroughs / districts as the Local Plan continues forwards on these issues, and in their stages of delivery / implementation. This will be particularly relevant where urban areas already coalesce.</p> <p><u>Exceptional Circumstances Case</u> As recognised in the Topic Paper: Housing Delivery, exceptional circumstances are required to justify any amendment to the Green Belt boundary in accordance with the National Planning Policy Framework (NPPF), para. 83. We acknowledge the factors set out in para. 4.17 of the Topic Paper which Guildford Borough Council considers in general terms are exceptional circumstances. We do not wish to dispute that these are challenges for Guildford Borough Council. However, we have some concern that the issues identified are not particularly unique to Guildford Borough e.g. affordability and unmet need, are common place within a South-East and Surrey context. Further consideration may therefore be required to ascertain whether the Guildford Borough Council considers that this is an</p>	<p>We consider that the scale of potential development areas being assessed/identified in the GBCS are not of a scale that would impact upon the fundamental aim of preventing the sprawl of London. An assessment of the strategic significance of the Metropolitan Green Belt would need to be undertaken at a much wider level. We have continued to work with other neighbouring councils in developing methodologies for undertaking Green Belt reviews to ensure there is a consistent approach.</p> <p>We have continued to work with neighbouring councils to understand the cross boundary impact that site allocations may have. We do not consider that any site allocations lead to the coalescence of urban areas.</p> <p>We consider there are exceptional circumstances, as set out in the Housing Delivery Topic Paper. Whilst the issues experienced within Guildford borough may not be unique within a Surrey context, to not amend Green Belt boundaries when 89% of the borough is Green Belt would lead to a severe worsening of these issues. This issue will only resolve itself across the wider region if each authority seeks to meet their OAN which itself is influenced by factors such as market signals.</p>



Council	Relevant duty to cooperate representations	GBC response
	'exceptional' case to amend the Green Belt boundary.	
Elmbridge Borough Council (2016)	<p><b>Policy S2</b>  Policy S2: Borough Wide Strategy sets out the proposal to provide 43 permanent pitches for Gypsies and Travellers and 6 permanent plots for Travelling Showpeople over the period 2012 - 2017. A further 30 pitches and 2 plots are then proposed between 2017 and 2027. In regard to the provision of new pitches and plots, the Council would like to reiterate the comments it made on the Draft Plan, namely:</p> <ul style="list-style-type: none"> <li>• it is confusing that the time periods stated above do not cover the same time period as the Submission Plan. <ul style="list-style-type: none"> <li>○ Given that the plan period is from 2013 - 2033, the Council is concerned as to how the additional need for pitches and plots beyond 2027 will be accommodated, as identified through an updated Traveller Accommodation Assessment (TAA). The Council would be grateful if some indication could be provided as to a timetable for an updated TAA and whether this would allow the Council sufficient time to identify additional sites prior to the examination and adoption of the plan. The concern being that the existing TAA is out of date, not reflecting the Government's changes to the Planning Policy for Traveller Sites (August 2015). In addition, and notwithstanding the fact that the Draft Local Plan seeks to allocate more pitches and plots than is required, the concern is that based on the proposed allocations set in the Sites table on page 123 onwards, land designated as Green Belt is likely to be required to meet any further need. This could lead to a potential conflict with paragraph 83 of</li> </ul> </li> </ul>	<p>An updated TAA has been produced to reflect up-to-date surveys and new legislation. The new TAA covers the period to 2034. The LAA includes a detailed breakdown of the sites proposed to meet the identified traveller need. There is no surplus of identified sites that could be used to meet unmet needs. All the sites identified are required to meet the needs of our settled traveller community with an appropriate buffer to ensure delivery.</p>

Council	Relevant duty to cooperate representations	GBC response
	<p>the NPPF (local authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period) should an updated TAA not be forthcoming and, in the event that an updated TAA identifies a higher need than the surplus allocated.</p> <ul style="list-style-type: none"> <li>• it would be useful for the Sites table on page 123 onwards to include information on the proposed allocation of pitches / plots for Gypsies, Travellers and Travelling Showpeople where this is part of a larger allocation / mixed-used development <ul style="list-style-type: none"> <li>○ For example, Site Allocation A24 Slyfield Area Regeneration Project. This will provide clarity to the overall numbers proposed to be allocated, their location and timeframe for delivery.</li> </ul> </li> </ul> <p>There appears to be a potential discrepancy between the total number of pitches and plots being provided as set out in Policy 82 and within the Sites table on page 123 onwards. As noted above, Policy S2 identifies that 73 pitches are required between 2012 and 2027 and 8 pitches are required for Travelling Showpeople. However, the Sites table lists that 82 pitches and 20 plots are to be provided. Firstly, the Council would like some clarification as to these sets of figures. Secondly, should Guildford Borough Council be able to identify sufficient suitable, available, and achievable sites over the required figure both now and in the future, we would welcome the opportunity to discuss whether unmet need arising in Elmbridge Borough could be met through the preparation of the Guildford Local Plan in accordance with the Government's duty to cooperate.</p>	

Council	Relevant duty to cooperate representations	GBC response
<p>Elmbridge Borough Council (2016)</p>	<p><b>Policy A35</b>  In regards to the proposed new settlement at Wisley (Policy A35), many of the concerns we previously raised have now been addressed through the publication of additional evidence base documents e.g. Habitats Regulation Assessment and Draft Infrastructure Delivery Plan, and by way of the evidence and statutory responses submitted in regards to the two planning applications for this site. The Council would however, like to reiterate those comments which it considers to be outstanding as well as make some additional comments in light of the publication of the Proposed Submission Plan and supporting evidence base.</p> <p>Due to the location of Wisley Airfield in relation to Elm bridge Borough, this site is of keen interest to us and our residents and so, we continue to query whether this is the right location for this scale of growth when considered against the principles of Green Belt. The fundamental aim of the Metropolitan Green Belt is ultimately to prevent the spread of London. The site is located in the very north west of the Guildford Borough where the Green Belt is already very fragmented and particularly vulnerable to additional development, a point that was noted by the Inspector for the examination into our Core Strategy. It is therefore considered that further evidence should be provided to indicate why this site has been identified in preference to other sites having regard to the strategic significance of the Green Belt in this location.</p> <p>In addition, we would like to understand further the process for considering the circ. 100, parcels of Green Belt and countryside that were considered to have low or medium sensitivity and how the work has resulted in this site, as opposed to other areas, being proposed for allocation. Working our way through the various Volumes and Addendum it would appear that Guildford Borough Council has been</p>	<p>Noted.</p> <p>The allocation of Wisley airfield is based upon the findings on the GBCS and other sustainability considerations linked to our spatial hierarchy. As set out in our SA we do not consider there to be alternatives to Wisley airfield given the housing need and the infrastructure it provides to support the development itself and wider growth proposed in the borough.</p> <p>The GBCS has assessed all land parcels against the Green Belt purposes to arrive at the sensitivity analysis. Whilst this helped inform the spatial strategy it did not serve as a showstopper to the identification of potential development areas (PDAs). These were identified on the basis of a number of different potential spatial strategy</p>

Council	Relevant duty to cooperate representations	GBC response
	<p>selective in assessing the environmental capacity and sustainability of the parcels and we query why only those parcels on the edge of the urban edge were considered. Furthermore, Parcel G18 (Wisley) is not located next to the urban edge and therefore in accordance with this general approach, should have been excluded for further consideration as have other similar parcels.</p> <p>Turning to the Proposed Submission Plan, we would recommend that Table 1 – Planned Delivery between 2018 and 2033, be amended to show more clearly when it is envisaged that each strategic allocation would be delivered rather than generically stating the period of 1 - 15 years. Our concerns regarding the impact on the strategic road network remain, particularly in regard to the proposed development at Wisley but also other proposed development sites along and in close proximity to the A3. For example, Policy A43 Land at Garlick's Arch, Send Marsh I Burnt Common and Ripley which will further compound the impact on the road network should the appropriate mitigation measures not be implemented. Without the mitigation measures identified in the Government's Road Investment Strategy (RIS) (phases 1 and 2) the residual cumulative impact of the Proposed Submission Local Plan on the highway network could be considered severe. As set out in the evidence base, the RIS schemes are complicated and may involve land acquisition and planning permission and, as a result, Highways England is cautious about programming these schemes. Given these complications, and also the infrastructure required on-site to support the scheme and the securing of the land north of the site for Suitable Alternative Natural Greenspace (SANG) (in regard to the Wisley scheme), it is considered that the Borough Council could provide a better estimate in terms of delivery knowing that the development of some sites is unlikely to be in the first few years of the plan.</p>	<p>options – strategic sites around urban areas, small scale growth around villages, significant growth around villages and a new settlement.</p> <p>Table 1 has been deleted in the Reg 19 Local Plan (2017) as more detailed phasing is set out in the housing trajectory in the LAA. This includes a breakdown of the yearly phasing for all the strategic and larger site allocations. The estimated delivery has been informed from assumptions on the likely delivery of associated infrastructure including the RIS schemes. Policy ID1 requires that the necessary infrastructure is provided and available when first needed. This will be secured through planning condition and/or planning obligation.</p>

Council	Relevant duty to cooperate representations	GBC response
Elmbridge Borough Council (2017)	<p><b>Policy S2</b> It is acknowledged that the Proposed Submission Local Plan seeks to meet a revised housing need of at least 12,426 new homes between the amended period of 2015 and 2034. This is on the basis of the evidence contained within the West Surrey SHMA Guildford Addendum Report 2017. The number of new homes to be provided represents a decrease of 1,434 homes from that set out within the previous Proposed Submission Plan for which Guildford Borough Council proposed to meet.</p> <p>It is understood that the land previously identified to accommodate the higher housing number has been revisited (Land Availability Assessment (LAA) and 2017 addendum). Notwithstanding the comments made in the document, it is considered that as this land was once identified as being available and developable it should be reconsidered and the potential for it to assist in meeting the unmet need across the housing market areas revisited.</p>	<p>Noted.</p> <p>The sites that have been removed from the plan were removed for planning reasons. Detail justification is provided in the Housing Delivery Topic Paper.</p>
Elmbridge Borough Council (2017)	<p><b>Policy ID1</b> Clarification is sort as to the interaction of points 3, 4 and 4 of this Policy. Points 3 and 5 relate specifically to planning applications with Point 3 stating that if the provision of infrastructure necessary to support new development cannot be secured, planning permission will be refused. However, this appears to be contradicted in Point 5 where it is suggested that regard will be had to the delivery and timing of delivery of the key infrastructure but does not necessarily constitute a refusal. The difference appears to be reference to 'key infrastructure'. However, given the significance of the timely delivery of key infrastructure this point is considered to be even more pertinent.</p>	<p>There is no contradiction between ID1(3) and ID1(5). The wording included at ID1(5) allows for the appropriate delivery and timing of key infrastructure in relation to determining planning applications. The use of Grampian conditions relating to the phasing of development and associated necessary infrastructure delivery / timing may be considered in line with this policy.</p>

Council	Relevant duty to cooperate representations	GBC response
	<p>It is also considered that the Policy would read better if the planning application and Local Plan elements were more clearly distinguished.</p>	<p>A reordering of the elements under ID1 is proposed to address the clarity of the policy and logical clustering of statements in relation to planning applications.</p>
<p>Elmbridge Borough Council (2017)</p>	<p><b>Policy A35</b>  In regards to the proposed new settlement at Wisley (Policy A35) it is acknowledged that there are two amendments to the site's boundary. In regard to the first amendment it is understood that additional land is being added that was previously not considered available for allocation / development. Whilst there is no objection to the land being added per se, it is queried whether the identified capacity of the site should be amended to reflect the additional land now included. Should the potential capacity of the site change consideration should also be given to an additional impact on infrastructure requirements that would need to be included within the Local Plan.</p>	<p>Part of the land in the southern area may be required to be delivered as SANG should the capacity of the site be increased above the level currently being pursued through the planning application. Additionally the southern extension is necessary to overcome some of the design/heritage issues identified in the planning application proposal. We therefore do not consider it is appropriate to increase the capacity of the site.</p>
<p>Elmbridge Borough Council (2017)</p>	<p><b>Appendix C</b>  Following the removal of Table 1 and the recognition with the Local Plan that the strategic development sites are likely to be delivered during the 6-10 and 11-15 periods, the delivered when dates as set out in the appendix need to be consistent with this. For example, PED2 still refers to Years 1-15.</p>	<p>Policy ID1 states that the infrastructure necessary to support new development will be provided and available when first needed to serve the development's occupants and users and / or to mitigate its otherwise adverse material impacts.</p> <p>Site allocations in the Submission Local Plan include provision related to schools as a requirement, where appropriate.</p> <p>The IDP is regarded as a live document, which will be reviewed and modified as required throughout the plan period as further information becomes available.</p>

Council	Relevant duty to cooperate representations	GBC response
		Strategic sites are likely to deliver across the plan period. The Education Review (2016) reflects pressure on education provision in several wards containing strategic sites across the whole period of the plan – aligning with the indication in the IDP. The precise timing of delivery of secondary schools will be determined taking into account development phasing and other relevant considerations.
Mole Valley District Council (2016)	<p><b>Retail/Employment</b></p> <p>Guildford is within commuting distance of MVDC by both car and train. Seeking to create strategic employment sites may be beneficial to Mole Valley residents as it would offer wider employment opportunities.</p>	Noted. The plan seeks to protect against the loss of Strategic and Locally Significant employment sites. The plan allocates new employment sites but these are to meet the needs arising from Guildford borough, although it is acknowledged that the jobs may be filled by residents of adjoining authorities.
Mole Valley District Council (2016)	<p><b>Policy A35</b> <u>Highways</u></p> <p>Development at Wisley Airfield would give rise to a significant increase in vehicle movements. The nearest principal road, the A3, and other nearby trunk routes, M25, A317, A319, are all heavily congested. It is therefore likely that traffic will seek to make use of less congested routes, particularly at peak periods, encouraging ‘rat running’ and avoidance activities on the local rural road network to the south of the site, and southern roads such as the A246. Significant additional traffic on these roads would have an adverse effect on land within Mole Valley. MVDC is pleased to note that the requirements section to policy A35 (Land at former Wisley Airfield) has identified a number of works that will need to be done in order to improve the road network. MVDC would also ask that a Traffic</p>	Highways England is progressing the development of a major scheme for the improvement of the M25 Junction 10/A3 Wisley interchange, as required by the Road Investment Strategy: for the 2015/16 – 2019/20 Road Period (Department for Transport, March 2015) (hereafter the RIS). The RIS identifies the M25 Junction 10/A3 Wisley interchange scheme as a scheme which will enter construction in this Road Period, provided that the necessary statutory approvals are granted and the scheme continues to demonstrate value for public money (p.30). The scheme is proposed to relieve congestion and improve safety. This scheme is

Council	Relevant duty to cooperate representations	GBC response
	<p>Impact Study which includes mitigation measures should be submitted as part of any application.</p> <p>A number of sites are earmarked for development within and around the edges of West Horsley, East Horsley and Clandon. As with MVDC, the rural areas around Guildford are heavily constrained and the majority of new development has to be accommodated on smaller sites which makes it difficult to phase development and ensure the provision of infrastructure and services is in line with the rate of building. MVDC would ask that GBC are aware of this as and when applications begin to come forward, especially given the potential impacts identified as the Wisley Airfield development goes forward.</p>	<p>referenced as SRN3 in the Submission Local Plan's Infrastructure Schedule.</p> <p>New north facing junctions to the A3 are proposed at the A247 Burnt Common interchanges, referenced as schemes SRN9 and SRN10. These junctions are being promoted to mitigate the impact of the level of strategic planned growth and in particular the development traffic flows resulting from the development of a new settlement at the former Wisley airfield (site allocation Policy A35), as well as limiting any increase in traffic joining and leaving the A3 at the Ockham interchange.</p> <p>These schemes will encourage traffic to use the Strategic Road Network and A roads rather than rat-runs on minor roads.</p> <p>A Transport Assessment will be required in support of a planning application for a strategic site such as the former Wisley airfield.</p> <p>Scheme LRN22 is included in the Infrastructure Schedule at Appendix C in recognition that the housing development around East and West Horsley will have a material impact on local roads including B2039 and East Lane. It is envisaged that money will be taken from future developments for site allocation policies A37, A38, A39 and A40 through Section 106 agreements in order to mitigate the traffic and environmental impacts of these developments or alternatively the scheme will be funded through CIL.</p>



Council	Relevant duty to cooperate representations	GBC response
	<p><u>Flooding</u> The Wisley Airfield site is identified as being partly in Flood Zone 3. MVDC would expect this to be taken into account when assessing a planning application on the site and that any Flood Risk Assessment would take measures to mitigate flooding in the wider area.</p> <p><u>Education</u> MVDC have previously raised concerns that the development of the Wisley Airfield site had the potential to put additional pressures on the need for secondary school places both in GBC and MVDC. Of particular concern was pressure on places at Howard of Effingham School which would result in cross-boundary issues, particularly for residents in Bookham, for whom Howard of Effingham is the most popular local secondary school. Given the above MVDC are pleased to see the allocation of a secondary school within the Wisley Airfield site, as well as a primary school as previously proposed.</p> <p>The Surrey School Organisation Plan does predict a steady rise in the need for secondary school places in Guildford over the next 10</p>	<p>Policy ID1 requires, at point (3), that 'If the timely provision of infrastructure necessary to support new development cannot be secured, planning permission will be refused'. Point (5) requires that 'When determining planning applications, and attaching appropriate planning conditions and/or planning obligations, regard will be had to the delivery and timing of delivery of the key infrastructure, or otherwise alternative interventions which provide comparable mitigation.'</p> <p>Appropriate mitigation for flood risk is listed as a requirement in the site allocation.</p> <p>Noted. We will continue to work with Surrey County Council to understand and provide for the education needs arising from planned growth.</p>

Council	Relevant duty to cooperate representations	GBC response
	<p>years. Therefore, MVDC would ask to be kept apprised of the potential for development at this site, and that GBC consults with Surrey County Council so that county wide pressures can be taken into consideration.</p> <p><u>Health</u> The allocation at Wisley Airfield will result in a significant increase in the local population, and it is noted that no specific provision has been made for primary health care. MVDC would expect GBC to consult with both Guildford and Waverley and Surrey Downs CCGs in order to address any cross-boundary issues that may result in a deficit of primary health care places in MVDC, specifically Bookham where the draft NHP has identified an existing need.</p> <p>It may be beneficial if any consultation on this topic would include NHS England South East Region and that development aligns with the strategic transformation plan as agreed by the Surrey Heartlands Collaboration which includes social care and health.</p> <p><u>Waste</u> The comment in Key Considerations of policy A35 (Land at former Wisley Airfield) regarding the waste allocation in the corner of the site is noted. It would be expected that consultations with Surrey County Council would be carried out regarding the need for alternative locations if required.</p> <p>Upgrades to Thames Water waste water treatment works were mentioned in the refusal of the original planning application on the site. It would be expected that consultations with Thames Water would continue on this matter and that the upgrades would be carried out in time to support any proposed development and mitigate any</p>	<p>The allocation includes 500sqm of community uses (D1) that could support a health facility. The Infrastructure Schedule at Appendix C includes the provision of this land at nil cost by the developer linked to the planned provision of a GPs surgery with pharmacy (HSC4).</p> <p>The site is no longer available for a waste use. This will be reflected within the new waste plan which is currently being prepared.</p> <p>Policy ID1 is targeted to ensure the timely provision of infrastructure necessary to support new development. At the site level, any planning permission may be subject to a Grampian planning condition, preventing occupation until any necessary upgrades have been made.</p>

Council	Relevant duty to cooperate representations	GBC response
	<p>impact on provision outside GBC.</p>	<p>In relation to wastewater connections and treatment infrastructure, the site is reflected in the Infrastructure Schedule at Appendix C and Infrastructure Delivery Plan. Whilst the developer will be required to assess capacity, and provide detailed drainage strategies, this development may also need to be considered as part of Thames Water's investment planning.</p>
<p>Runnymede Borough Council (2016)</p>	<p><b>Policy S2</b>  Policy S2: The Borough wide strategy makes provision for 693 dwellings per annum to 2033, and 43 pitches and 6 plots 2012-2017 with an additional 30 pitches and 2 plots to 2017. As such, the policy is meeting economically derived OAN and full identified GTAA needs, as evidenced by the SHMA and the GTAA.</p> <p>The policy also sets out that housing is needed to support the supply of 3,200 B class jobs, but it is not possible to discover where from the ELR or the Employment topic paper, that this figure has been derived. However, as not in Runnymede's FEA, this is not a matter of particular concern to us.</p> <p>Para 4.1.11, as supporting text to Policy S2, states that Table 1 shows development to be delivered between 2018 and 2033, and sums to 10,395 (693 per annum). As such, it has to be assumed that 3,465 (693 per annum) is to be delivered 2013-2018, but there is no identification or breakdown of sites delivered or under construction from 2013 onwards that count towards the target.</p> <p>Para 4.1.12 states that Table 1 shows that the number of new homes is greater than the target. Table 1 sums to 13,652, which is less than</p>	<p>Noted.</p> <p>The updated ELNA (2017) identifies the total number of jobs which has been included within Policy E1.</p> <p>The Annual Housing Target table is proposed to be amended as a minor modification to aid clarity (namely show the annual target over the plan period 2015 – 2033) which sums to 12,426 (the total housing requirement).</p> <p>Table 1 has been deleted as the supply that will meet the housing requirement is identified in the Council's</p>

Council	Relevant duty to cooperate representations	GBC response
	<p>the target, so it is not clear if the 13,652 is for the period 2018-2033 or for 2013-2033.</p> <p>The list of housing sites sum to 12,630 which, with addition of windfall at 625, gives 13,255. This is less than the figure quoted in Table 1 and the housing target in Policy S2, but the list of sites is not clear if these are for 2018-2033, or if any are under construction.</p>	<p>latest LAA. This will include a breakdown of completions since 2015, outstanding permissions, windfall and suitable LAA sites. In total this is greater than 12,426 to provide a buffer.</p>
Runnymede Borough Council (2016)	<p><b>Policy P2</b> Policy P2 sets out the villages to be inset from the Green Belt and identifies them for limited infilling. However, the NPPF is different from the former PPG2, in that it no longer sets out that villages can be inset and identified for infilling only. The NPPF is concerned with whether a village is either in or out of the Green Belt, and not the type/level of development that may occur.</p>	<p>Policy P2 sets out that limited infilling is appropriate within the identified settlement boundaries of villages washed over by the Green Belt and may also be appropriate <i>outside</i> the inset or identified settlement boundaries. Development is not restricted to limited infilling <i>within</i> the inset boundaries.</p>
Runnymede Borough Council (2017)	<p><b>Policy S2</b> It is noted that policy S2, Planning for the borough – our spatial development strategy, of the Local Plan, intends to meet a housing need equivalent to a level of 654 dwellings per annum. This is the figure set out in the Land Availability Assessment (LAA) Addendum (June 2017).</p> <p>However, It is not the figure set out in the Final West Surrey SHMA (September/October2015), which identified an overall need for housing over the 2013-33 period for Guildford of 693 homes per annum. This document was prepared by GL Hearn on behalf of Guildford, Waverley and Woking Borough Councils jointly.</p> <p>Runnymede Borough Council is concerned that Guildford is not proposing to meet its full OAN, with consideration therefore having to</p>	<p>The Proposed Submission Local Plan identifies sufficient sites to meet our OAN, as identified in the West Surrey SHMA: Guildford Addendum Report (2017).</p>

Council	Relevant duty to cooperate representations	GBC response
	<p>be given to the question as to whether the Plan is unsound on that basis, notwithstanding that there has been some joint working with Waverley and Woking in pursuit of the Duty to Co-operate.</p> <p>Moreover, as Runnymede is not yet in a position to be able to confirm that it is able to meet its own housing needs in its emerging Local Plan, 'Runnymede 2035', this Council will continue to request assistance concerning this matter from Guildford (and, indeed, from other Local Planning Authority areas).</p>	<p>We do not consider that unmet needs from within the HMA can be met within Guildford borough. Should additional sites come forward, they would be expected to meet needs within Guildford's own HMA, rather than adjoining HMAs. The justification is set out in more detail in the Duty to Cooperate and Housing Delivery topic papers.</p>
<p>Rushmoor Borough Council (2016)</p>	<p><b>Policy S2</b> The draft Plan sets out at Policy SS2 a spatial development strategy; effectively, what type of development, how much of it, and where will it go. In respect of housing, Policy SS2 plans for 13,860 new homes over the Plan period (2013-2033). This equates to an average of 693 net new dwellings a year, and would meet Guildford Borough's objectively assessed housing need (OAN) within its administrative area.</p> <p>Guildford Borough Council considers that, in fact, the Plan will meet the OAN with flexibility. The total potential provision of new homes across the plan period (including completions since 2013 and outstanding capacity) is 15,844. This provides 1,984 homes as a buffer. This is not planned over provision, but rather, flexibility that helps to guard against the policies in the plan becoming out of date by failing to deliver a five-year supply of available housing sites. Guildford Borough Council does however make clear in the supporting documentation that it is unable to help with addressing unmet housing needs from within its own Housing Market Area.</p>	

Council	Relevant duty to cooperate representations	GBC response
	<p>Rushmoor Borough Council is supportive of Guildford Borough's commitment to meet its OAN within its administrative boundary.</p> <p>In terms of the availability of housing sites, an interesting statistic to note is that 89% of Guildford Borough falls within the Metropolitan Green Belt. The Plan sets out in Policy SS2 a spatial hierarchy, which identifies a brownfield first policy including, where appropriate, previously developed land in the Green Belt. The following spatial options are then considered to be the most sustainable locations:</p> <ul style="list-style-type: none"> <li>Guildford town centre</li> <li>Guildford, and Ash and Tongham urban area</li> <li>Inset villages</li> <li>Identified Green Belt villages</li> <li>Rural exception housing</li> <li>Countryside beyond the Green Belt</li> <li>Guildford urban extensions</li> <li>New settlement at the former Wisley airfield</li> <li>Development around village</li> </ul> <p>Guildford Borough contains some "Countryside Beyond the Green Belt", although this notation covers only 2% of the Borough, and is located in the west of the Borough near Ash and Tongham. Mindful of the hierarchy set out in paragraph 4.3 above, and the need to identify enough land to deliver an average of 693 new dwelling a year, the draft Plan contains several housing allocations that fall on land that is subject to this designation.</p> <p>Policy A29 is the most significant of these allocations, identifying land for approximately 1200 homes around Ash and Tongham. A map</p>	<p>Noted.</p>

Council	Relevant duty to cooperate representations	GBC response
	<p>showing the distribution of the sites that comprise this allocation is shown at Appendix 1 of this report. In addition to this, there are two other smaller allocations (A27: Warren Farm, Ash Green and A28: Land to the east of White Lane, Ash Green) of 120 units in total, 629 homes with planning permission (net outstanding) and 124 completions since the base date of 2013. In the wider Ash and Tongham area, taking into account completions, permissions and Local Plan allocations, this equals 2,057 homes to be delivered by 2033.</p> <p>In terms of any potential cross boundary impacts of this development, whilst it is located close to the boundary with Rushmoor Borough, mindful of the constraints noted above, Guildford Borough Council has very limited opportunities to accommodate its objectively assessed housing need. The draft Plan contains a number of other strategic housing allocations, including land at former Wisley Airfield (2,100 homes), Slyfield Regeneration Project (1,000 homes), Gosden Hill Farm (2,000 homes), and Blackwell Farm (1,800 homes). In addition, there are a number of other allocations of around 100 units. Importantly, the evidence supporting the Plan has had to review the function of land within the Green Belt, and facilitate some land releases from it, in order to achieve the scale of residential development required to meet Guildford's OAN.</p> <p>Rushmoor Borough Council is supportive of Guildford's approach of "leaving no stone unturned" in seeking to meet its housing need. This is positive in as much as it is not asking Rushmoor to help meet its housing needs, and in this respect, at this point in time, both authorities can be said to satisfy the "duty to cooperate" on the cross boundary strategic issue of meeting housing needs.</p>	<p>Noted.</p>

Council	Relevant duty to cooperate representations	GBC response
	<p>Policy S2 (Borough Wide Strategy) contains reference to the identification of 43 permanent pitches for Gypsies and Travellers and 6 permanent plots for Travelling Showpeople within Guildford Borough by 2017. A requirement for additional pitches and plots beyond 2017 is also recognised.</p> <p>Guildford Borough Council is committed to meeting its identified needs for travellers within its administrative boundary in the first instance, which is important to Rushmoor Borough mindful of the fact that even though our Boroughs adjoin, we are cited in a different County. It is noted that in order to meet these needs, as well as some individual site allocations, such as at Send Marsh and Effingham, the draft Plan requires in Policy H1 (Homes for all) that traveller accommodation should be provided on development sites of 500 homes or more. However, on land around Ash and Tongham, the individual housing sites that together comprise the allocation are individually less than 500 units, hence the policy requirement to provide traveller sites will not apply in this location.</p> <p>In this context, Rushmoor is supportive of the policy approach to planning for travellers as set out in the draft Local Plan.</p>	<p>Noted.</p>
<p>Rushmoor Borough council (2016)</p>	<p><b>Policy H1</b>  In terms of the detail of the proposed housing allocations around Ash and Tongham, other policies in the draft Plan enable the consideration of relevant planning issues; for example, Policy H1 (Homes for all) requires a mix of housing to be provided to meet a range of accommodation needs.</p> <p>The suite of policies used to support the determination of proposals</p>	<p>Noted.</p>



Council	Relevant duty to cooperate representations	GBC response
	for residential development and associated infrastructure, including Policy H1, is supported.	
Rushmoor Borough council (2016)	<p><b>Policy P2</b> Policy P2 of the draft Local Plan relates to Green Belt. This notes that whilst some land has been removed from the Green Belt to facilitate residential development to meet identified housing needs, the Green Belt boundary has in fact been extended between Ash Green village and the Ash and Tongham urban area in order to prevent coalescence. Whilst not directly adjoining Rushmoor Borough, it is relevant to note and support this proposed addition to the Green Belt, given the supplementary protection it offers to the green infrastructure surrounding Ash and Tongham in the longer term, once the permissions and allocations for this part of Guildford Borough are built out over the period to 2033.</p>	Noted.
Rushmoor Borough council (2016)	<p><b>Policy P3</b> Of relevance to Rushmoor, mindful of the allocations around Ash and Tongham, Policy P3 (Countryside) is predicated on the need to ensure that there is no further encroachment into the countryside designation to the west and south of the urban area of those settlements. It notes specifically that any further proposals for development beyond those permitted and allocated would only be allowed provided they would not lead to a greater physical or visual coalescence between the Ash and Tongham urban area and Aldershot. The reasoned justification supporting Policy P3 states that,</p> <p>“Any development proposals which compromise the integrity of the gap that separates the Ash and Tongham urban area with neighbouring Aldershot will be resisted.”</p>	

Council	Relevant duty to cooperate representations	GBC response
	<p>In the context of the strategic allocation for residential development on land to the south and east of Ash and Tongham, Rushmoor Borough Council welcomes the inclusion of Policy P3 in the draft Plan, and the recognition of the importance of the gap between the Ash and Tongham urban area and Aldershot.</p>	Noted.
Rushmoor Borough council (2016)	<p><b>Policy P5</b>            In terms of the detail of the proposed housing allocations around Ash and Tongham, other policies in the draft Plan enable the consideration of relevant planning issues; for example, Policy P5 relates to the Thames Basin Heaths Special Protection Area (SPA), and would prevent proposals that are not supported by measures to avoid and mitigate the adverse effects on the ecological integrity of the SPA.</p> <p>The suite of policies used to support the determination of proposals for residential development and associated infrastructure, including Policy P5, is supported.</p>	Noted.
Rushmoor Borough council (2016)	<p><b>Policy E2</b>            The draft Local Plan sets out policies that provide a strategy for supporting Guildford Borough's strong and vibrant local economy. It allocates 37,200 – 47,200 sq m of office and research and development floorspace (including a 10 hectare extension to Surrey Research Park), and 4.7 – 5.3 hectares of industrial land. It also seeks to protect existing strategic and locally important employment sites.</p> <p>Rushmoor Council is supportive of Guildford Borough's approach to protecting and enhancing the employment land offer within its</p>	Noted.

Council	Relevant duty to cooperate representations	GBC response
	<p>administrative area, particularly as the objectively assessed housing need takes account of the need to facilitate the delivery of new homes to help provide a local pool of economically active workforce. Moreover, this is reflective of the Enterprise M3 LEP's Strategic Economic Plan, and the role that Guildford plays in the economic well-being of the northern part of the LEP area, within which Rushmoor also falls.</p>	
<p>Rushmoor Borough council (2016)</p>	<p><b>Policy E7</b>  The focus for retail and service provision is centred on Guildford itself. Policy E7 (Guildford Town Centre) includes the delivery by 2033 of a new retail-led mixed use development of 45,000 sq m (gross) of additional comparison goods floorspace on the North Street regeneration site. Moreover, the policy supports the delivery of a mix of other town centre uses such as food and drink establishments, cinemas and gyms, active use of the riverside, and around 1,172 new homes.</p> <p>The policy contained in the draft Plan is in keeping with the role of Guildford as the Borough's main town centre, and the scale of development is commensurate with this role. Rushmoor Borough Council recognises that it is an appropriate scale of future growth for Guildford.</p>	<p>Noted.</p>
<p>Rushmoor Borough council (2016)</p>	<p><b>Policy ID1</b>  The Strategic Highway Assessment report (2016) sets out that in respect of the development proposed in the Local Plan, without any mitigation, the greatest potential impacts are seen on the network in the vicinity of Ash / Ash Vale and travelling north into the borough of Surrey Heath. Some of the trips in Ash / Ash Vale will join the A331 Blackwater Valley Road to travel further afield, but it is likely that a</p>	<p>This is as stated in paragraph 4.13.9 of the Guildford Borough Proposed Submission Local Plan "June 2016": Strategic Highway Assessment Report (Surrey CC, June 2016).</p>

Council	Relevant duty to cooperate representations	GBC response
	<p>reasonable proportion will travel into the neighbouring boroughs of Rushmoor and Surrey Heath. Some of these roads already experience congestion, despite the model suggesting that existing traffic flows are relatively low.</p> <p>Policy ID1 (Infrastructure and delivery) of the draft Plan requires the infrastructure needed to support development to be provided and available when first needed to serve the occupants and users of the development. Infrastructure includes parks, green spaces and play areas, roads and other transport, schools, flood defences, sporting and recreational facilities, and medical facilities. Policy ID3 deals with sustainable transport for new developments, and seeks to ensure that new developments will contribute to the delivery of an integrated, accessible and safe transport system.</p> <p>Specifically of interest to the strategic allocation around Ash and Tongham, further information on key infrastructure projects is provided at Appendix C of the draft Plan, in the Infrastructure Schedule. Infrastructure projects LRN9 through to LRN14 relate to improvements to traffic management and environmental improvements in and around Ash, Ash Vale and Tongham, to be funded through a combination of developer contributions and Enterprise M3 Local Economic Partnership Local Growth Fund awards. For example, the schedule identifies LRN14, which is a junction improvement scheme at the connection of the A331 Blackwater Valley Route with the A31 Hog's Back (Tongham). It is important to note that this mitigation is required to enable the development proposed in the Local Plan to proceed.</p> <p>In this context, Rushmoor Borough Council is supportive of the planning policy framework and detailed infrastructure projects as</p>	<p>Noted. The Policy requirements have been strengthened with respect to the delivery of the key infrastructure</p>

Council	Relevant duty to cooperate representations	GBC response
	<p>they relate to the road network, subject to certainty regarding the delivery of these improvements as part of the overall package of implementation of development in and around Ash, Ash Vale and Tongham.</p> <p>In addition, PED6 sets out a potential expansion of Ash Grange Primary School if required to provide spaces for the primary age children who will live in the new homes to the south and east of Ash and Tongham. These infrastructure proposals are supported by Rushmoor Council, mindful of the strategic allocation for residential development in and around the settlements of Ash and Tongham.</p>	<p>requirements on which the delivery of the Plan depends in the Draft Local Plan 2017:</p> <ul style="list-style-type: none"> <li>- Policy ID1 Infrastructure and delivery was amended to require that 'If the timely provision of infrastructure necessary to support new development cannot be secured, planning permission will be refused' – see paragraph (3).</li> <li>- Policy ID3 Sustainable transport for new developments was amended to require that 'Planning applications for new development will have regard to the Infrastructure Schedule at Appendix C which sets out the key infrastructure requirements on which the delivery of the Plan depends, or any updates in the latest Guildford borough Infrastructure Delivery Plan' – paragraph (8).</li> </ul> <p>Noted.</p>
Rushmoor Borough council (2016)	<p><b>Policy ID3</b> As well as Policy ID3, Sustainable transport for new developments, the draft Local Plan is also committed to supporting the Department for Transport's Road Investment Strategy (Policy ID2), focusing on improvements to the strategic road network (A3 and M25). The draft</p>	

Council	Relevant duty to cooperate representations	GBC response
	<p>Local Plan is supported by the Guildford Borough Transport Strategy 2016, which sets out the strategic and local transport infrastructure required to support the development proposed in the Plan.</p> <p>Rushmoor Borough Council is supportive of the suite of transport policies and proposals identified through the policy framework in the draft Plan and the Guildford Borough Transport Strategy 2016. It is likely that the benefits of the implementation of these proposals will be felt not only within Guildford Borough, but also more widely, given the sensitivity of the transport network to individual incidents. For example, Policy A26, the mixed use allocation for Blackwell Farm, off the A31, includes a new link road from the A31, through to Surrey Research Park and the Royal Surrey County Hospital. This will be immensely beneficial in terms of relieving congestion on the A31 into Guildford, as this will assist with removing the need for traffic travelling from the west of Guildford to drive in and back out using either the A3 trunk road or via the town when seeking to access the Research Park and the Hospital.</p> <p>However, in the absence of the implementation of the full suite of transport policies and proposals to support the quantum of development set out in the Local Plan, this would potentially result in negative cross boundary transport impacts, the residual cumulative impacts of which would be severe. In this context, the Council looks forward to continuing to work with Guildford Borough Council on potential cross boundary strategic transport issues, to ensure that those arising from development proposed in the Guildford Local Plan are appropriately mitigated.</p>	<p>Noted.</p> <p>Noted. We have continued to work with Surrey and Hampshire county councils, and Rushmoor Borough Council on cross boundary transport matters.</p>
Rushmoor Borough	<p><b>Policy S2</b> The Council recognises that this current stage is a focussed</p>	

Council	Relevant duty to cooperate representations	GBC response
Council (2017)	<p>consultation on the changes being proposed to the Plan prior to submission, and Rushmoor Borough Council has not identified any proposed changes that would require further detailed comments.</p> <p>However, the Council is mindful of the discussions which took place at the recent Waverley Local Plan Examination Hearings relating to unmet need in the West Surrey Housing Market Area (HMA). Therefore, the Council would like to take the opportunity to clarify our position.</p> <p>The Hart, Rushmoor and Surrey Heath (HRSH) SHMA (2016) identifies a housing need of 1,200 homes per annum across the HMA between 2014 and 2032. Of these, 436 homes per annum are identified as being required within Rushmoor, which equates to a total need of 7,850 dwellings to be provided in the Borough over the Plan period (2014 to 2032).</p> <p>In assessing whether this need can be met, given the tightly constrained urban nature of the Borough, the Council has sought to maximise the use of town centre sites, both to enable housing delivery and to support town centre regeneration objectives. This included developing a more challenging understanding of site capacities. The Council has also explored opportunities for the further release of employment sites, having regard to the need to provide a reasonable balance between employment and housing, and ensure that there is sufficient supply of employment sites to meet the economic needs of the Functional Economic Area and of the Enterprise M3 LEP area. This further work was undertaken through the preparation of the SHELAA (2017), which identified that the Council is in a position to meet the OAHN for Rushmoor set out in the latest version of SHMA (2016).</p>	Noted.

Council	Relevant duty to cooperate representations	GBC response
	<p>In terms of meeting wider housing needs, the Council has continued to cooperate with authorities outside the Hart, Rushmoor and Surrey Heath HMA to raise awareness about the constrained nature of the Borough. Whilst we have been responsive to discussions on the issue, the evidence in the SHELAA confirms that the Council is not in a position to assist other authorities or HMAs in meeting any shortfall they may be expecting or have in meeting their identified OAHN.</p>	
<p>Spelthorne Borough Council (2016)</p>	<p><b>Policy S2</b>  Further to our detailed letter of 4 September 2014 the Borough Council welcomes Guildford’s approach to housing issues and notes that the plan seeks to provide for all of the objectively assessed housing needs for Guildford as established in the Final SHMA for Woking, Guildford and Waverley published in October 2015. It also notes that delivery of the required housing is dependent on key infrastructure, particularly major highway improvements, being provided during the plan period. Spelthorne Borough Council would have concerns if Guildford was unable, for whatever reason, but particularly because of the lack of highway improvements, to meet its commitments.</p> <p>Spelthorne BC would therefore welcome greater clarification on what options (Para 1.19) the Borough Council would consider in the event that the council finds that it is not meeting its objectively assessed need.</p> <p>This Council also welcomes the fact that Guildford is seeking to meet</p>	<p>Noted.</p> <p>The Proposed Submission Local Plan seeks to meet Guildford borough’s OAN. Once adopted, we will continue to monitor the effectiveness of the Local Plan. In accordance with the national policy and guidance, the planning policy officers will review the relevance of the Local Plan at regular intervals to assess whether some or all of it may need updating.</p> <p>Noted.</p>



Council	Relevant duty to cooperate representations	GBC response
	<p>all the assessed needs for gypsies and travellers for the plan period. It is noted that no provision is being made for transit sites at this stage but should a need be identified in the wider area this Council would expect to be consulted under the Duty to Cooperate.</p>	
<p>Spelthorne Borough Council (2016)</p>	<p><b>Policy H1</b>  The Council notes Guildford's approach in seeking to achieve densities compatible with the local area context, character and sustainability. Paragraph 47 of the NPPF notes that local authorities should 'set out their own approach to housing density to reflect local circumstances'. Whilst it is agreed that the local plan does this, Spelthorne would hope that , in order to maximise opportunities within the existing urban areas to meet the housing targets set out in policy S2 Guildford will seek to achieve higher densities in general. Policy H1 refers to supporting higher densities in Guildford town centre, but this could be extended to include employment areas, public transport hubs and other sustainable locations in the borough.</p> <p>Spelthorne is currently undertaking work to consider the impact of extensions on the stock of dwellings which tends to increase the stock of larger dwellings whilst depleting the supply of smaller more affordable dwellings. Given the mix of housing types and tenures the Council is seeking to achieve it is not clear if Guildford has taken the effect of housing extensions into account as part of this process.</p>	<p>Policy D4 requires that all developments make the most efficient use of land whilst responding to local character and context.</p>
<p>Spelthorne Borough Council (2016)</p>	<p><b>Policy P4</b>  The primary river in Guildford is the River Wey and its tributaries enter the River Thames at Shepperton. Spelthorne BC would be concerned if a reduction of floodplain storage in its upper catchment would result in greater flood water levels entering the Thames and affecting Spelthorne. This Council would therefore agree that Policy</p>	<p>Noted. Policy P4 addresses this issue at point (2) (c). This states that development proposals in areas at risk of flooding must be accompanied by a site-specific flood risk assessment, which demonstrates that the proposed development will not increase flood risk elsewhere, and</p>

Council	Relevant duty to cooperate representations	GBC response
	<p>P4 on flood risk should ensure that flood storage capacity is maintained and ideally bettered, as any loss in capacity could lead to increased flows downstream. Spelthorne's own policy on flooding (policy LO1 of the Core Strategy and Policies DPD 2009) reflects these principles of flood storage capacity.</p>	<p>where possible, will reduce flood risk overall. This would include potential flood risk to areas downstream of the development, which could otherwise be affected by a loss of upstream storage capacity. Point (2) (d) also deals with the issue by stating that schemes in these areas must incorporate appropriate flood resistance and resilience measures.</p>
<p>Spelthorne Borough Council (2017)</p>	<p><b>Policy S2</b>  We note Appendix C, however given the level of development proposed in the future, Spelthorne BC would wish to be advised that the appropriate level of infrastructure is planned for over the whole plan period in support of this.</p> <p>As our authorities are in adjoining Housing Market Areas, it is felt that full consideration will need to be given to assessing the potential options for both housing and infrastructure if, for whatever reason, the OAN cannot be met, as set out in paragraph 1.19.</p>	<p>Appendix C identified the level of infrastructure that we consider necessary to deliver the growth requirements set out in the plan in a sustainable way.</p> <p>Noted. The Proposed Submission Local Plan seeks to meet Guildford borough's OAN. Once adopted, we will continue to monitor the effectiveness of the Local Plan.</p>
<p>Surrey Heath Borough Council (2016)</p>	<p><b>General</b>  Surrey Heath Borough Council is pleased to note that most of the objections made to the 2014 Draft Guildford Local Plan consultation have been addressed. To this end Surrey Heath Borough Council no longer raise objections to the lack of evidence base, the identification of full objectively assessed housing need and the strategic growth location in the Blackwater Valley.</p>	<p>Noted.</p>
<p>Surrey Heath Borough Council (2016)</p>	<p><b>Policy P2</b>  Surrey Heath Borough Council does raise an objection regarding the lack of duty to co-operate with respect of removing both Pirbright Barracks and Keogh Barracks from the Green Belt. As set out in our</p>	<p>Pirbright Barracks and Keogh Barracks are proposed to be inset on the basis that they do not contribute towards the openness of the Green Belt. In accordance with</p>

Council	Relevant duty to cooperate representations	GBC response
	<p>2014 response Surrey Heath indicated that it is important that the plan-making process of both Surrey Heath and Guildford recognise these sites and that engagement and dialogue in relation to them is constructive and on-going.</p> <p>In addition Surrey Heath Borough Council is concerned that no other land designation appears to be given to the areas to be removed from the Green Belt. The sites are described as major previously developed sites inset from the Green Belt in Paragraph 4.3.15 of the Submission Local Plan. This leaves the status of these sites quite unclear with no policy direction as to how they could be developed in the future. Pirbright is a large site and sits immediately adjacent to the Council's strategic housing site at Deepcut. Keogh Barracks abuts Surrey Heath.</p> <p>In light of the above concern, Surrey Heath objects to the Local Plan as currently drafted.</p> <p>The Council would welcome the opportunity to engage with Guildford via the duty to co-operate processes with a view to resolving these concerns and thus facilitating sound and effective plan making.</p>	<p>NPPF paragraph 85 we should not include land which it is unnecessary to keep permanently open in the Green Belt. Following a meeting with Surrey Heath we sent a letter stating that we are not aware of any intentions from the MOD to change the way in which these sites are currently used or for them to relocate from them entirely. This view is substantiated by no reference to either site within the Footprint Strategy you forwarded.</p> <p>In spite of this, their location with 400m of the SPA and their rural location places a significant constraint as to the sort of development that could be considered appropriate on the sites. We therefore consider that insetting the sites from the Green Belt is unlikely to result in any significant changes to the overall use or impacts of the sites but has potential to help to support their current uses and functioning.</p>
Surrey Heath Borough Council (2017)	<p><b>Policy S2</b> As you will be aware through our Duty to Co-operate letter dated the 19th January 2017, Surrey Heath is severely constrained in terms of available land for housing development, primarily through the Thames Basin Heaths Special Protection Area (SPA) and the need to provide avoidance measures in respect of the impact of housing on the SPA. The Borough also has large areas of MOD operational land and Green Belt.</p>	

Council	Relevant duty to cooperate representations	GBC response
	<p>Surrey Heath is now in the early stages of developing a new Local Plan and continues to develop a broad range of appropriate evidence to enable it to make robust decisions in respect of the extent that the Plan is able to meet the OAHN for Surrey Heath. However, the Council's most recent Strategic Land Availability Assessment (July 2016) indicates that there will be a shortfall of land within the Borough to deliver the Council's OAHN and, whilst the Council will consider spatial strategies that could reduce this shortfall in the course of preparing the new Local Plan, it is unlikely that Surrey Heath will be in a position to meet the full OAHN for the Borough.</p> <p>As a result, it is possible that Surrey Heath will need to look to its Housing Market Area to accommodate any demonstrated unmet need. In the event that the Housing Market Area is unable to meet this need, the Council may need to approach other authorities who do not form part of the Hart, Rushmoor and Surrey Heath housing market area, but with whom the Housing Market Area shares links. This would include Guildford.</p> <p>In view of the above and in light of the fact that Guildford has previously proposed a sustainable development strategy capable of delivering 1,400 additional houses over and above that set out within the current iteration of its Proposed Submission Local Plan, Surrey Heath would welcome further engagement with Guildford under the Duty to Cooperate to better understand why Guildford, under the terms of the updated Plan, is unable to allow for any flexibility to accommodate any demonstrated unmet need arising in any neighbouring Boroughs.</p> <p>Surrey Heath would also request that the Guildford Duty to Cooperate Topic Paper is updated to include Surrey Heath as a duty</p>	<p>We do not consider that unmet needs from within the HMA can be met within Guildford borough. Should additional sites come forward, they would be expected to meet needs within Guildford's own HMA, rather than adjoining HMAs. The sites that have been removed from the plan were removed for planning reasons. The justification is set out in more detail in the Duty to Cooperate and Housing Delivery Topic Papers.</p> <p>The Duty to Cooperate matrix in the Topic Paper identifies those LPAs with which Guildford is assessed</p>

Council	Relevant duty to cooperate representations	GBC response
	to cooperate body with which engagement on housing matters should be undertaken. This reflects the linkages between the Housing Market Areas covering Guildford and Surrey Heath and reflects the content of the Surrey Heath Duty to Cooperate Scoping Statement.	to have the highest degree of linkages with, as set out in the West Surrey SHMA. It is therefore not definitive and cooperation will clearly need to occur with the wider adjoining HMAs where appropriate.
Surrey Heath Borough Council (2017)	<p><b>Policy P2</b> In response to the June 2016 consultation, Surrey Heath raised an objection to the proposed removal of Keogh and Pirbright Barracks from the Green Belt. The Council recognise that the Council's concerns have subsequently been addressed by Guildford Borough Council, who have confirmed that the inseting the sites from the Green Belt is unlikely to result in any significant changes to the overall use or impacts of the sites as a result of their rural location and proximity to the Thames Basin Heaths Special Protection Area.</p>	Noted.
Waverley Borough Council (2016)	<p><b>General</b> Waverley acknowledges the valuable co-operation that has taken place between our two Boroughs over the last few years and it is appreciated.</p> <p>To confirm our response to the 2014 draft Guildford Local Plan, Waverley acknowledges the considerable effort that Guildford is seeking to meet its identified housing needs and supports the number of homes per annum proposed in the plan which would meet the objectively assessed needs in the SHMA. However, future developments in Guildford have the potential to have an impact on Waverley, both individually and cumulatively.</p> <p>The Council would again like to stress the importance of and our commitment to continued joint working and liaison between Guildford</p>	<p>Noted.</p> <p>Noted. We have continued to work with Waverley Borough Council on cross boundary matters.</p>

Council	Relevant duty to cooperate representations	GBC response
	and Waverley as our respective new Local Plans reach a critical stage.	
Waverley Borough Council (2016)	<p><b>Policy S2</b> The Council supports the housing target set out in Policy S2 of providing for 13,860 new homes (693 homes per annum from 2011 to 2033) as this is the objectively assessed level of housing need for Guildford Borough in the West Surrey SHMA (September 2015). The Council also supports the provision in the plan of additional Gypsy/Traveller pitches.</p>	Noted.
Waverley Borough Council (2016)	<p><b>Policy P1</b> The Council supports the approach to the Surrey Hills Area of Outstanding Natural Beauty (AONB) and Areas of Great Landscape Value (AGLV) set out in this policy to that is to keep the boundaries for both until such time as a review by Natural England is undertaken, as it mirrors that of Waverley in its emerging Local Plan Part 1.</p>	Noted.
Waverley Borough Council (2016)	<p><b>Policy P2</b> The Council notes and welcomes that Guildford has undertaken a review of its Green Belt in accordance with National Policy Guidance. We also note that Guildford intends to continue to protect the Green Belt, but with some villages to be inset from the Green Belt and six strategic sites in the Green Belt identified for development. The approach of inseting some villages to allow limited infilling is supported as this is consistent with the NPPF.</p> <p>The Council notes the intended removal of some strategic sites and the proposed extension of Green Belt around the Ash and Tongham area. Whilst these changes are mentioned in the supporting text, it</p>	<p>Noted.</p> <p>The policy relates to land within the Green Belt. Once the plan is adopted these sites will no longer be in the Green Belt and the policy is therefore not applicable to</p>

Council	Relevant duty to cooperate representations	GBC response
	would be clearer if they were stated more explicitly in the policy itself.	them. Similarly the new Green Belt proposed at Ash and Tongham would be designated Green Belt and the policy would therefore apply. We therefore consider it appropriate that this context is set out in supporting text rather than in the policy itself.
Waverley Borough Council (2016)	<p><b>Policy P5</b> This policy is consistent with saved Policy NRM 6 of the South East Plan and the Thames Basin Heaths Delivery Framework and so is supported.</p>	Noted.
Waverley Borough Council (2016)	<p><b>Policy E1</b> Guildford has an important economic role in the region which influences Waverley's economy in terms of the provision of jobs for Waverley residents and the strong commercial links with businesses in our Borough. It is therefore important to Waverley that the Guildford Local Plan maintains this role by delivering the employment floorspace and land demonstrated as needed in the Guildford Employment Land Needs Assessment (ELNA).</p> <p>Policy E1 states that Guildford will provide for an additional 3,200 additional B Class jobs to be delivered through the allocation of between 37,000 and 47,000 sq m of B1a/b floorspace and between 4.7 and 5.3 hectares of industrial (B1c, B2 and 88) land which is the need identified in Guildford's recent Employment Land Needs Assessment (ELNA) and as such we have no objection to this.</p>	Noted.
Waverley Borough Council (2016)	<p><b>Policies ID2 and ID3</b> Waverley and Guildford Borough Councils have worked closely recently with each other on transport issues, for example by jointly commissioning Surrey County Council to produce the 2016 Strategic</p>	Noted.

Council	Relevant duty to cooperate representations	GBC response
	<p>Highway Assessment to inform both authorities' Local Plans. The RIS schemes for improvements to the A3 will have an indirect, but nonetheless important impact on the Strategic Road Network as it affects Waverley. The Council would therefore wish to add its support to that of Guildford Borough for the RIS as well as recognising the need for continued liaison between the Boroughs, the Highways Authority and Highways England on the nature and timescales of the A3 improvements.</p>	
<p>Waverley Borough Council (2016)</p>	<p><b>Site allocations</b></p> <p>It is noted that there are 57 proposed site allocations in the plan for a range of uses, including for housing, employment, retail and traveller pitches. The housing/mixed use sites provide for a wide range of dwellings from 10 units up to 2000 units. Most of these sites are some distance from Waverley but one (A29), which would deliver around 1,200 homes in the Tongham and Ash Green area, contains two parcels around Grange Farm that are close to the junction of the A31 and the A331 and also close to boundary with Waverley. One of these parcels is subject to a current hybrid planning application for 254 dwellings and associated SANG with the housing in Guildford and the SANG in Waverley. It would be important for any impacts from this allocation, including impacts on the Thames Basin Heaths SPA to be addressed in this or any subsequent planning application.</p> <p>In addition, there are several large strategic sites of between 1,000 and 2,000 dwellings that are close to the Guildford urban area and are near to the A3 trunk road. These include sites A24 (Slyfield Area), A25 (Gosden Hill Farm), A26 (Blackwell Farm) and A35 (former Wisley airfield). It will be important to ensure that the impacts of these developments on the A3 are carefully assessed in conjunction with planned improvements to the A3, for example the</p>	<p>Noted. Sites within land currently designated as Countryside Beyond the Green Belt are coming forward through planning applications as piecemeal development. We are working closely with Surrey County Council and other stakeholders to understand and mitigate the impact of additional development.</p> <p>New developments that will generate significant amounts of movement will, at the planning application stage, be supported by a Transport Statement or Transport Assessment, and subject to the policy tests in NPPF paragraph 32 and Policy ID3. Individual new developments may be required to provide mitigation measures additional to those in the Infrastructure</p>



Council	Relevant duty to cooperate representations	GBC response
	<p>section from the A320 to the Hog's Back (A31 junction) in the Road Investment Strategy (RIS). Traffic using the A3 has a significant impact on Waverley and so it is essential that these impacts are mitigated.</p> <p>As a more general comment, the Council would welcome confirmation that in the detailed assessment of any more significant sites that may have cross-boundary impacts, the impacts on Waverley's infrastructure and services will be considered and, if necessary, addressed.</p>	<p>Schedule. See Policy ID3 points (10) and (7).</p> <p>Policy ID3, as amended in the Draft Local Plan 2017, requires at point (7) that 'New development will be required to provide and/or fund the provision of suitable access and transport infrastructure and services that are necessary to make it acceptable, including the mitigation of its otherwise adverse material impacts, within the context of the cumulative impacts of approved developments and site allocations. This mitigation:</p> <ul style="list-style-type: none"> <li>(a) will maintain the safe operation and the performance of the Local Road Networks and the Strategic Road Network to the satisfaction of the relevant highway authorities, and</li> <li>(b) will address otherwise adverse material impacts on communities and the environment including impacts on amenity and health, noise pollution and air pollution.' <p>Surrey County Council is the Local Highway Authority for Local Road Network in Surrey, including both Waverley and Guildford boroughs.</p> <p>Accordingly, the traffic impacts of development will be assessed through the planning application process as and when sites come forward. Where relevant, Waverley Borough Council may wish to comment on applications.</p> </li></ul>
Waverley Borough Council (2017)	<p><b>Policy S2</b></p> <p>The Council notes that, on the basis of the West Surrey SHMA: Guildford Addendum Report 2017, the amount of new housing that the plan provides for has reduced from 13,860 homes over the</p>	

Council	Relevant duty to cooperate representations	GBC response
	<p>period 2013-33 (693 per annum) in the 2016 version of the plan to 12,426 new homes from 2015-34 (654 per annum) in this new version. This is a reduction of about 1,400 homes.</p> <p>As you will be aware, the Waverley Local Plan Part 1 (LPP1) was submitted for examination in December. This sought to provide 9,861 homes in the period 2013-32 or 519 homes per annum. Hearing sessions have just concluded and the Inspector has provisionally concluded that Waverley should increase its housing provision to 590 homes p.a., which includes a significant uplift to address affordability issues and making provision for 50% of Woking's unmet need for the period 2013-2027 (1,575 homes, or 83 dwellings per annum over the plan period 2013 to 2032). Whilst the Inspector made it clear that he was not examining the Guildford Local Plan, he added that Guildford would be strongly pressed at the examination into its Local Plan into why it is not intending to meet some or all of the remaining unmet needs arising from Woking.</p> <p>In light of this, the Council would strongly recommend that you give further consideration as to whether Guildford BC can also make an appropriate contribution towards meeting the unmet needs of Woking. The Council understands that the revised plan includes a housing buffer of about 10%, which shows that there is already capacity to meet some of Woking's unmet needs. In addition, it is noted that a number of sites that were included in the earlier draft Local Plan have been dropped from the latest plan for various reasons. Given the unmet need from Woking, it is anticipated that your Council may be challenged to justify why none of these sites are capable of making a contribution towards unmet needs.</p> <p>During the Examination hearings, the Council identified some</p>	<p>The buffer (approximately 10%) is required to ensure sufficient flexibility to meet our housing target should sites not be delivered as planned. We do not consider that unmet needs from within the HMA can be met within Guildford borough. The justification is set out in more detail in the Duty to Cooperate Topic Paper.</p> <p>The sites that have been removed from the plan were removed for planning reasons. This is set out in more detail in the Housing Delivery Topic Paper.</p> <p>Justification for allocating sites and discounting others is</p>

Council	Relevant duty to cooperate representations	GBC response
	<p>potential modifications to address concerns raised by the Inspector. These include a potential modification to clarify that the land between Aaron's Hill and Halfway Lane, indicated on Plan 2 of Waverley's submitted Local Plan, can be removed from the Green Belt in LPP1, allowing the Waverley portion of the promoted site to be allocated. The Council recommends that Guildford BC reconsiders its position on this site to allow, preferably, a joint scheme to be progressed across both authorities. The resultant development could also contribute to helping Guildford to meet the unmet needs of Woking.</p> <p>Waverley Borough Council welcomes the cooperation and close liaison that has taken place over recent years as our Local Plans have progressed and is committed to continued joint working in the future. However, the Council recommends that Guildford should consider whether it can contribute, as Waverley will be doing, towards meeting an appropriate proportion of the unmet housing need from Woking.</p>	<p>set out in the Housing Delivery Topic Paper. Whilst discounted, Aaron's Hill was tested through the Sustainability Appraisal. We note Waverley is proposing that this site is removed from the Green Belt as one of the major modifications to the Plan.</p> <p>Noted. We are continuing to cooperate with both Woking and Waverley Borough Councils in relation to meeting housing need across the HMA. Pursuant to this, we have signed a Memorandum of Understanding and Statement of Common Ground which sets out in more detail how we propose to continue cooperating on this matter.</p>
Waverley Borough Council (2017)	<p><b>Policy H1</b> The proposal to require 15% of all new homes on sites of 25 homes or more to be accessible dwellings is supported, as is the requirement that 5% of homes on sites of 100 homes or more to be self build or custom build pots if there is a need.</p>	Noted.
Waverley Borough Council (2017)	<p><b>Policy P2</b> In our response to the 2016 version of the plan, we suggested that it would be helpful if the intended removal of some strategic sites and the proposed extension of Green Belt around the Ash and Tongham area were explicitly referred to in the policy as well as in the supporting text. We note that this suggestion has not been taken up.</p>	The policy relates to land within the Green Belt. Once the plan is adopted these sites will no longer be in the Green Belt and the policy is therefore not applicable to them. Similarly the new Green Belt proposed at Ash and Tongham would be designated Green Belt and the policy would therefore apply. We therefore consider it

Council	Relevant duty to cooperate representations	GBC response
		appropriate that this context is set out in supporting text rather than in the policy itself.
Waverley Borough Council (2017)	<p><b>Policy E1</b></p> <p>It is noted that as a result of updated evidence on Employment Land Needs, the amount of Classes B1 a and b floorspace and Classes B1c, B2 and B8 land have been reduced, although the number of jobs to be created has been increased from 3,200 to 4,100. We are unclear how such a large increase in jobs is to be achieved whilst reducing the amount of land allocated, but we presume that this is due to higher job/floorspace densities as a result of technological innovation. It would be helpful if this could be explained.</p>	<p>Consultants AECOM have produced both the 2015 and 2016 ELNA and have used their standard methodology for converting the forecast increase in workers to the amount of floorspace required to meet the needs. As set out in para 6.6.6 of the ELNA, AECOM calculated the net additional jobs by estimated the existing level of employment (through a comparison of BRES and ONS Workforce Jobs series) and applying the Property Market Area growth rates. The ELNA (2015) did not include this analysis so the estimate of additional jobs was not calculated on the same basis.</p>
Waverley Borough Council (2017)	<p><b>Policy A29</b></p> <p>Most of the sites proposed for allocation are some distance from Waverley and would therefore not lead to any impacts on the Borough. However, one of these (A29) would deliver 1,750 homes in the Ash and Tongham area, an increase of 550 from the 2016 version of the plan. This includes a development at Grange Farm close to the junction of the A31 and the A331 and close to the boundary with Waverley. There is a current cross boundary planning application (WA/2017/1050) for up to 254 residential dwellings (in Guildford) plus SANG (in Waverley) on this site. As stated previously, it would be important for any impacts from this allocation, including impacts on the Thames Basin Heaths SPA to be addressed in this or any subsequent planning application.</p>	<p>The increase in allocation is presentational only as the number has been increased to reflect unimplemented planning permissions that currently exist in this area. Impacts on the SPA are dealt with through Policy P5. Other environmental impacts are dealt with through Policy ID4.</p>

Council	Relevant duty to cooperate representations	GBC response
Waverley Borough Council (2017)	<p><b>Policy A26</b></p> <p>In addition, we note that the A26 site (Blackwell Farm), to the west of Guildford, has been retained with a total yield of 1,800 homes, but that only 1,500 of these dwellings are expected to come forward in the plan period. Compton Parish Council has expressed concerns over the allocation in terms of potential highways impacts on local communities, including Binscombe and Farncombe within Waverley. Again, it would be important for any cross boundary impacts from the development on these communities to be identified and addressed.</p>	<p>The Guildford Borough Proposed Submission Local Plan “June 2016”: Strategic Highway Assessment Report (Surrey CC, June 2016) (hereafter the SHAR 2016) tested 1,800 new homes at the Blackwell Farm site.</p> <p>The SHAR 2016 concludes that “The results show that for Scenario 5, which represents the quantum and distribution of development proposed in the Proposed Submission Local Plan together with the key highway schemes, there will not be a severe impact on the local and strategic highway network” (p.62). The addendum to the SHAR 2016 (Guildford BC, June 2017) found that this conclusion was “not considered likely to change” as a result of the key changes made to proposed site policies and to the programme of transport schemes in the Draft Local Plan 2017.</p> <p>New development that will generate significant amounts of movement, will, at the planning application stage, be supported by a Transport Statement or Transport Assessment, and subject to the policy tests in NPPF paragraph 32 and Policy ID3. New developments may be required to provide mitigation measures additional to those in the Infrastructure Schedule.</p> <p>Accordingly, the traffic impacts of development will be assessed through the planning application process as and when sites come forward. Where relevant, Waverley Borough Council may wish to comment on applications.</p>

Council	Relevant duty to cooperate representations	GBC response
Woking Borough Council (2016)	<p><b>General</b></p> <p>Woking, Guildford and Waverley Borough Councils are in the same Housing Market Area and Functional Economic Market Area and as such have common strategic cross boundary issues of interest to be considered as part of the plan making process. Under the Duty to Cooperate, Woking Borough Council has already worked in partnership with Guildford Borough Council to scope the common strategic issues of interest, including housing, transport and infrastructure provision, and in particular, the traffic implications of your plan in Woking. Officers from both authorities have signed a Memorandum of Understanding to work together to address both current and future strategic cross boundary issues. So far, the partnership working between the two authorities is positive and purposeful. It is important to highlight that Woking Borough Council is also in the process of preparing two Development Plan Documents, and the Duty to Cooperate discussions have been and should continue to be a two way dialogue between the two authorities to the mutual benefit of our respective Plans.</p>	Noted.
Woking Borough Council (2016)	<p><b>Policy S2</b></p> <p>Overall, it is acknowledged that the Guildford Local Plan has made a significant attempt to identify sufficient land to meet the full objectively assessed housing need for the Borough for the entire plan period. In particular, the Plan makes provision for the delivery of 13, 860 new homes between 2013 and 2033. This is equivalent to 693 new homes a year. In additional, the Plan identifies land to deliver about 1,984 new homes as a buffer to ensure early provision, flexibility of delivery and the deliverability of the housing requirement. This will make a significant contribution to housing provision in the Housing Market Area, and is commended. However, the Council would like to make the following detailed comments:</p>	Noted. The buffer (approximately 10%) is required to ensure sufficient flexibility to meet our housing target should sites not be delivered as planned. However, we acknowledge that should these sites all be delivered as planned then their delivery would serve to meet identified needs.

Council	Relevant duty to cooperate representations	GBC response
	<p>Paragraph 47 of the National Planning Policy Framework (NPPF) emphasises that local authorities should use their evidence base to ensure that their Local Plans meets the full objectively assessed needs for market and affordable housing in the housing market area. Paragraph 179 goes on to say that joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas.</p> <p>The Council is aware of the information that Guildford Borough Council has provided to demonstrate that the unmet need from Woking cannot be met in Guildford. Once this evidence is agreed at the Examination, the Council is willing to cooperate with Guildford and Waverley Borough Councils to find ways of how the unmet need in the Housing Market Area can be addressed. It is recognised that discussions have already started between the three authorities on this particular issue and it is envisaged that this will continue. The three authorities should also monitor housing delivery against their housing requirements to see whether any measures will be necessary to facilitate housing delivery.</p>	<p>We do not consider that unmet needs from within the HMA can be met within Guildford borough. The justification is set out in more detail in the Duty to Cooperate and Housing Delivery Topic Papers. We are continuing to cooperate with both Woking and Waverley Borough Councils in relation to meeting housing need across the HMA. Pursuant to this, we have signed a Memorandum of Understanding and Statement of Common Ground which sets out in more detail how we propose to continue cooperating on this matter.</p>
Woking Borough Council (2016)	<p><b>Policy P5</b> The protection of the Thames Basin Heaths Special Protection Area (SPA) is a strategic issue of significant interest to all the local authorities with SPAs within their boundaries. A Joint Strategic Partnership Board has been set up to ensure that a strategic approach is taken for its protection. In accordance with the relevant legislative guidance, it will be helpful if the policy is drafted to avoid harm to the SPA rather than its current focus on mitigating identified adverse impacts. In this regard, an indication in Policy P5 of whether Guildford Borough Council has identified sufficient SANGs land to</p>	<p>The policy has been rewritten to differentiate more clearly between avoidance and mitigation. The steps in the policy indicate that avoidance is the first step.</p> <p>The identification of SANG takes place in the Draft Infrastructure Delivery Plan. The Draft Infrastructure Delivery Plan sets out that sufficient SANG has been identified in the right places to deliver development proposals.</p>

Council	Relevant duty to cooperate representations	GBC response
	meet its development needs would be helpful.	
Woking Borough Council (2016)	<p><b>Appendix C</b>  Woking Borough Council will be concerned if there are any unmitigated traffic implications of the development proposals in the Guildford Local Plan that would have adverse impacts in the Borough. The development of some of the strategic sites identified in the Local Plan such as the Former Wisley Airfield would potentially have significant traffic implications in Woking if the impacts are not addressed. The implications of developing the proposals in the Plan on the road network such as the A3 corridor would be severe if appropriate mitigation is not identified and delivered as part of developing the sites. Appendix C of the Local Plan sets out the transport infrastructure projects identified to support the delivery of the Plan. This includes a number of projects to improve the A3 corridor and other road networks with indicative costings and funding sources. Woking Borough Council is aware that Highways England is still in the process of testing various options for A3 corridor improvements. The outcome of this work is not yet known. It is expected that the outcome of the work will be reflected in the Local Plan and if necessary used to refine the projects set out in Appendix C. Any adverse impacts should be appropriately addressed to ensure the sustainable delivery of the Local Plan without exacerbating the existing traffic conditions in Woking.</p>	<p>The Guildford Borough Proposed Submission Local Plan “June 2016”: Strategic Highway Assessment Report (Surrey CC, June 2016) (hereafter the SHAR 2016) assessed the potential traffic impacts of the Draft Local Plan 2016 on the surrounding highway network within other neighbouring borough/district areas. Table 4.13 and paragraph 4.13.10 set out the potential unmitigated traffic impacts of roads into the borough of Woking.</p> <p>Policy ID3, point (7), requires new development in Guildford borough to provide and/or fund the provision of necessary mitigation which ‘will maintain the safe operation and the performance of the Local Road Networks and the Strategic Road Network to the satisfaction of the relevant highway authority’.</p> <p>The implementation of the three Road Investment Strategy (RIS) schemes during the Plan period, alongside other critical infrastructure, is required in order to be able to accommodate future planned growth both outside and within the borough.</p> <p>Policies in the Draft Local Plan 2017 manage the risks arising from the uncertainties regarding the delivery and timing of delivery of the key infrastructure on which the delivery of the Plan depends, including the three Road Investment Strategy (RIS) schemes. See Policy ID1, particularly at points (4) and (5). Point (4) refers to the</p>



Council	Relevant duty to cooperate representations	GBC response
	<p>The Local Plan should be supported by adequate infrastructure, in particular, educational facilities. This is necessary to avoid any additional pressure on existing infrastructure in Woking Borough. Appendix C sets out the education facilities identified to support the Local Plan. However, unlike the early years and primary school provision, the provision of secondary schools has no delivery timetable and who is likely to deliver. It is clear from the evidence that to deliver the housing requirement, the education infrastructure in Appendix C will be necessary. Consequently, it will be helpful if indicative dates for their provision are provided and are aligned to when development are likely to come forward.</p>	<p>key infrastructure as being ‘set out in the Infrastructure Schedule at Appendix C, or any updates in the latest Guildford borough Infrastructure Schedule’. Policy ID3, at point (8), contains similar phrasing. Also in this regard, site policies A24 at requirement (2), A25 at requirement (9), A26 at requirement (9) and A35 at requirement (5) are relevant and use phrasing similar to that in Policy ID1 at points (4) and (5).</p> <p>Policy ID1 states that the infrastructure necessary to support new development will be provided and available when first needed to serve the development’s occupants and users and / or to mitigate its otherwise adverse material impacts.</p> <p>Site allocations in the Submission Local Plan include provision related to schools as a requirement, where appropriate.</p> <p>The IDP is regarded as a live document, and its Infrastructure Schedule will be reviewed and modified as required during the plan period as further information becomes available. Strategic sites are likely to deliver across the plan period. The Education Review (2016) reflects pressure on education provision in several wards containing strategic sites across the whole period of the plan. The precise timing of delivery of secondary schools will be determined taking into account development phasing and other relevant considerations.</p> <p>Secondary school place needs will be re-assessed at</p>

Council	Relevant duty to cooperate representations	GBC response
		<p>the time a planning application is determined. Any recent new secondary school provision will be taken into account to ascertain needs at the time.</p> <p>Surrey County Council have suggested that an indication of “TBD” under “Delivered when” is appropriate at this stage.</p>
Woking Borough Council (2016)	<p><b>Monitoring</b> The Local Plan would be further enhanced if it includes a section on how it will be implemented and the conditions for its review.</p>	<p>The Proposed Submission Local Plan seeks to meet Guildford borough’s OAN. Once adopted, we will continue to monitor the effectiveness of the Local Plan. In accordance with the national policy and guidance, the planning policy officers will review the relevance of the Local Plan at regular intervals to assess whether some or all of it may need updating.</p>
Woking Borough Council (2017)	<p><b>Policy S2</b> Woking, Guildford and Waverley Borough Councils are in the same Housing Market Area and Functional Economic Market Area and as such have common strategic cross boundary issues of interest to be considered as part of the plan making process. Under the Duty to Cooperate, Woking Borough Council has already worked in partnership with Guildford Borough Council to scope the common strategic issues of interest, including housing, transport and infrastructure provision, and in particular, the traffic implications of your plan in Woking. Officers from both authorities have signed a Memorandum of Understanding to work together to address both current and future strategic cross boundary issues. So far, the partnership working between the two authorities is positive and purposeful. It is important to highlight that Woking Borough Council is</p>	<p>Noted.</p>

Council	Relevant duty to cooperate representations	GBC response
	<p>also in the process of preparing its Site Allocations Development Plan Document, and the Duty to Cooperate discussions have been and should continue to be a two way dialogue between the two authorities to the mutual benefit of our respective Plans.</p> <p>Overall, it is acknowledged that the Guildford Local Plan has made a significant attempt to identify sufficient land to meet the full objectively assessed housing need for the Borough for the entire plan period based on the addendum Strategic Housing Market assessment undertaken by your Council. In particular, the Plan makes provision for the delivery of 12,426 new homes between 2014 and 2034. It is noted that the original figure in the West Surrey SHMA is 13,860 new homes. This is equivalent to 654 new homes a year. In addition, the Plan identifies land as buffer to ensure early provision, flexibility of delivery and the deliverability of the housing requirement. This will make a significant contribution to housing provision in the Housing Market Area, and is commended.</p> <p>However, the Council would like to make the following detailed comments:</p> <p>Paragraph 47 of the National Planning Policy Framework (NPPF) emphasises that local authorities should use their evidence base to ensure that their Local Plans meets the full objectively assessed needs for market and affordable housing in the housing market area. Paragraph 179 goes on to say that joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas. It is therefore expected that Guildford Borough Council will use the Local Plan process to meet the unmet housing need arising from Woking Borough. The Council is aware of the information that Guildford Borough Council has provided to demonstrate that the unmet need</p>	<p>The buffer (approximately 10%) is required to ensure sufficient flexibility to meet our housing target should sites not be delivered as planned. However, we acknowledge that should these sites all be delivered as planned then their delivery would serve to meet identified needs.</p> <p>We do not consider that unmet needs from within the HMA can be met within Guildford borough. The justification is set out in more detail in the Duty to Cooperate and Housing Delivery Topic Papers. We are continuing to cooperate with both Woking and Waverley Borough Councils in relation to meeting housing need across the HMA. Pursuant to this, we have signed a Memorandum of Understanding and Statement of Common Ground which sets out in more detail how we propose to continue cooperating on this matter. Further detail is set out in the Duty to Cooperate Topic Paper.</p>

Council	Relevant duty to cooperate representations	GBC response
	<p>from Woking cannot be met in Guildford. Once this evidence is agreed at the Examination, the Council is willing to cooperate with Guildford and Waverley Borough Councils to find ways of how the unmet need in the Housing Market Area can be addressed. Waverley Borough Council has just been through their Local Plan Examination and the unmet need from Woking was a key topic for discussion. It is recognised that discussions have already started between the three authorities on this particular issue and it is envisaged that this will continue. The three authorities should also monitor housing delivery against their housing requirements to see whether any measures will be necessary to facilitate housing delivery.</p>	
<p>Woking Borough Council (2017)</p>	<p><b>Policy P5</b> The protection of the Thames Basin Heaths Special Protection Area (SPA) is a strategic issue of significant interest to all the local authorities with SPAs within their boundaries. A Joint Strategic Partnership Board has been set up to ensure that a strategic approach is taken for its protection. In accordance with the relevant legislative guidance, it will be helpful if the policy is drafted to avoid harm to the SPA rather than its current focus on mitigating identified adverse impacts. In this regard, an indication in Policy P5 of whether Guildford Borough Council has identified sufficient SANGs land to meet its development needs would be helpful.</p>	<p>The policy has been rewritten to differentiate more clearly between avoidance and mitigation. The steps in the policy indicate that avoidance is the first step.</p> <p>The identification of SANG takes place in the Draft Infrastructure Delivery Plan. The Draft Infrastructure Delivery Plan sets out that sufficient SANG has been identified in the right places to deliver development proposals.</p>
<p>Woking Borough Council (2017)</p>	<p><b>Appendix C</b> Woking Borough Council will be concerned if there are any unmitigated traffic implications of the development proposals in the Guildford Local Plan that would have adverse impacts in the Borough. The development of some of the strategic sites identified in the Local Plan such as the Former Wisley Airfield would potentially have significant traffic implications in Woking if the</p>	<p>The Guildford Borough Proposed Submission Local Plan “June 2016”: Strategic Highway Assessment Report (Surrey CC, June 2016) (hereafter the SHAR 2016) assessed the potential traffic impacts of the Draft Local Plan 2016 on the surrounding highway network within other neighbouring borough/district areas. Table 4.13</p>

Council	Relevant duty to cooperate representations	GBC response
	<p>impacts are not addressed. The implications of developing the proposals in the Plan on the road network such as the A3 corridor would be severe if appropriate mitigation is not identified and delivered as part of developing the sites. Appendix C of the Local Plan sets out the transport infrastructure projects identified to support the delivery of the Plan. This includes a number of projects to improve the A3 corridor and other road networks with indicative costings and funding sources. Woking Borough Council is aware that Highways England is still in the process of testing various options for A3 corridor improvements. The outcome of this work is not yet known. It is expected that the outcome of the work will be reflected in the Local Plan and if necessary used to refine the projects set out in Appendix C. Any adverse impacts should be appropriately addressed to ensure the sustainable delivery of the Local Plan without exacerbating the existing traffic conditions in Woking.</p>	<p>and paragraph 4.13.10 set out the potential unmitigated traffic impacts of roads into the borough of Woking.</p> <p>Policy ID3, point (7), requires new development in Guildford borough to provide and/or fund the provision of necessary mitigation which 'will maintain the safe operation and the performance of the Local Road Networks and the Strategic Road Network to the satisfaction of the relevant highway authority'.</p> <p>The implementation of the three Road Investment Strategy (RIS) schemes during the Plan period, alongside other critical infrastructure, is required in order to be able to accommodate future planned growth both outside and within the borough.</p> <p>Policies in the Draft Local Plan 2017 manage the risks arising from the uncertainties regarding the delivery and timing of delivery of the key infrastructure on which the delivery of the Plan depends, including the three Road Investment Strategy (RIS) schemes. See Policy ID1, particularly at points (4) and (5). Point (4) refers to the key infrastructure as being 'set out in the Infrastructure Schedule at Appendix C, or any updates in the latest Guildford borough Infrastructure Schedule'. Policy ID3, at point (8), contains similar phrasing. Also in this regard, site policies A24 at requirement (2), A25 at requirement (9), A26 at requirement (9) and A35 at requirement (5) are relevant and use phrasing similar to that in Policy ID1 at points (4) and (5).</p>

Council	Relevant duty to cooperate representations	GBC response
	<p>The Local Plan should be supported by adequate infrastructure, in particular, educational facilities. This is necessary to avoid any additional pressure on existing infrastructure in Woking Borough. Appendix C sets out the education facilities identified to support the Local Plan. Guildford Borough Council should make sure that the list of infrastructure is adequate to mitigate development impacts across the borough.</p>	<p>We have worked closely with Surrey County Council officers to understand the impact of demographic and planned growth on schools. SCC are comfortable that the level of provision of education facilities as reflected in the Submission Local Plan is supportive of new development and education need.</p>
<p>Wokingham Borough Council (2016)</p>	<p><b>Policy S2</b>            Since the Draft Options consultation stage, the final West Surrey Strategic Housing Market Assessment (SHMA) has been published (in October 2015). This indicates that Guildford Borough lies within the West Surrey housing market area with the boroughs of Woking and Waverley. The SHMA recognised there is a strong relationship between West Surrey housing market area and that covering the Blackwater Valley (centred upon the authorities of Surrey Heath Borough, Rushmoor Borough and Hart District). Therefore, the Blackwater Valley housing market separates Wokingham Borough from the one which includes Guildford Borough. However, it is still important for Wokingham Borough Council to ascertain whether the West Surrey HMA is seeking to meet need within the HMA, as it may have implications for the Wokingham Housing Market Area if they do not.</p> <p>The final objectively assessed housing need (OAN) for Guildford Borough is 619 dwellings per annum between 2013 and 2033, which gives an overall need of 12,380 dwellings over the 20 year period. (This considerable change between the draft and final housing need figures is due to the Government's 2012 Household Projections being published during this time between.)</p>	<p>Noted.</p>

Council	Relevant duty to cooperate representations	GBC response
	<p>The plan seeks to allocate six strategic sites. This includes taking 1.6% of the Green Belt land in the Borough out of the Green Belt and allocating this for development. Overall the plan makes provision for 13,860 new homes, which will meet the housing need for the Borough.</p> <p>Wokingham Borough Council is therefore satisfied that on the basis of available information that Guildford Borough Council are planning to meet the need for the Borough, but would welcome further understanding of discussions with Woking and Waverley Borough Councils regarding the meeting of the housing need as an HMA.</p>	<p>The cooperation that has taken place between ourselves and Waverley and Woking borough councils is set out in this topic paper.</p>
<p>Wokingham Borough Council (2017)</p>	<p><b>Policy S2</b>  The update to the West Surrey SHMA: Guildford Addendum Report 2017 identifies a change in housing need in Guildford from 13,860 new homes 2013 to 2033, to 12,426 new homes 2015 to 2034. The Guildford Proposed Submission Local Plan demonstrates that Guildford Borough Council will meet its entire proposed housing requirement of the plan period. The Strategic Housing and Economic Land Availability Assessment (SHELAA) identifies provision for delivery of 13,581 new homes, giving a 1,155 buffer to allow flexibility for delivery. Guildford state that this buffer cannot be used to meet unmet need in other areas.</p> <p>Guildford Borough is within an HMA with Waverley and Woking Boroughs. Waverley Borough Council propose through their new local plan to meet their own housing need within the borough. Woking are currently unable to meet their housing need, with an existing shortfall of 3,150 homes 2013 to 2027. Woking are currently undertaking a Site Allocations DPD, however this has been delayed and creates uncertainty as to whether housing need will be met</p>	<p>We do not consider that unmet needs from within the HMA can be met within Guildford borough. Should additional sites come forward, they would be expected to meet needs within Guildford's own HMA, rather than adjoining HMAs. The justification is set out in more detail in the Duty to Cooperate and Housing Delivery Topic Papers.</p>

Council	Relevant duty to cooperate representations	GBC response
	<p>within the borough. Guildford Borough Council state in their Duty to Cooperate Statement that they have not been formally asked by Woking to accommodate any unmet need.</p> <p>Failure to accommodate unmet need in the West Surrey HMA means that neighbouring authorities may have to consider delivering further new homes. To the north is the HMA consisting of Hart, Rushmoor and Surrey Heath Borough Councils. It is known that Surrey Heath have indicated that they are unable to meet their housing need and Hart and Rushmoor Borough Councils are only proposing to meet their own housing needs.</p> <p>It is evidence that unmet housing need may arise from the Western Surrey HMA, and the adjoining Hart, Rushmoor and Surrey Heath HMA to which there are strong links. Seeking positive opportunities to meet needs in full is a central element of the National Planning Policy Framework (NPPF).</p> <p>Notwithstanding the Guildford Proposed Submission Local Plan seeking to meet the housing needs arising from their authority's areas, the plan does not consider the likelihood of unmet needs from elsewhere in the HMA, specifically Woking. Further it does not consider the unmet need arising from the adjoining HMA from Surrey Heath Borough Council. This is a major failing of the plan itself and in the outcome of engagement between the three authorities in the HMA.</p> <p>Notwithstanding the above, Guildford Borough Council should also be mindful of the White Paper "Fixing our broken housing market" (February 2017) which proposes a standardised methodology for assessing housing needs. It will be necessary for Guildford Borough</p>	



Council	Relevant duty to cooperate representations	GBC response
	<p>Council and the other authorities within the HMA to reconsider the level of housing need in the near future.</p> <p>In summary, although Guildford Borough Council intend to meet the contribution to wider housing needs the needs of the wider HMA are not addressed. In light of this it is not considered that the Duty to Cooperate has been complied with or that the plan is justified and effective, the result being that it is unsound. Guildford Borough Council should work with Waverley and Woking Boroughs to positively seek opportunities to meet development needs in full.</p>	

## Appendix 7: Regulation 19 representations from other key organisations

Organisation	Relevant duty to cooperate representations	GBC response
<p>Education Funding Agency (2016)</p>	<p><b>Policy ID1</b></p> <p>The EFA support reference within Policy ID1 to securing contributions from developers towards school provision through CIL and s106. You will have no doubt taken account of the key strategic policies to reiterate this position, but it would be helpful if they were explicitly referenced within the document. In particular:</p> <p>The EFA support the principle of Guildford Borough Council (BC) safeguarding land for the provision of new schools to meet government planning policy objectives as set out in paragraph 72 of the NPPF. Support is also given for the siting of schools within the allocated sites in locations which promote sustainable travel modes for pupils, staff and visitors. There is also a need to ensure that the education contributions made by developers are sufficient to cover the increase in demand for school places that is likely to be generated by a development. When new schools are developed, local authorities should also seek to safeguard land for any future expansion of new schools where demand indicates this might be necessary.</p> <p><b>Guildford BC Proposed Policy and Provision</b></p> <p>The EFA welcomes the support in Guildford's Infrastructure Delivery Schedule (para 4.6.3) to schools as necessary infrastructure required to help deliver sustainable growth in the borough. The EFA note that significant growth in housing stock is expected in the borough, with 14,500 new homes anticipated between 2017-2033. This will place significant pressure on social infrastructure such as education facilities.</p> <p>In light of the above, the EFA encourages local authorities to work</p>	<p>Noted.</p> <p>Noted. GBC have engaged with EFA on the Submission</p>

Organisation	Relevant duty to cooperate representations	GBC response
	<p>closely with us during all stages of planning policy development to help guide the development of new school infrastructure and to meet the predicted demand for primary and secondary school places.</p> <p>The Guildford Draft Local Plan: Education Review (May 2016) provides a useful background document setting out Guildford's requirements for new schools over the plan period. It confirms the need for 8FE primary places across the borough arising specifically from the strategic sites identified. In addition, it confirms 5FE secondary provision is required (beyond the existing planned provision) up to 2025. We note the Education Review is however intended to be reviewed and updated prior to the Strategy and Sites examination and request sight of this once published, to help inform any subsequent response from the EFA. Ensuring there is an adequate supply of sites for schools is essential and will ensure that Guildford can swiftly and flexibly respond to existing and future need for school places to meet the needs of the borough over the plan period.</p> <p>EFA support the following strategic sites: A25, A35, A46: these are areas where basic need will arise from the housing development proposed. The EFA would welcome the opportunity to work closely with Guildford BC to investigate the feasibility of opening a free school(s) on these sites.</p> <p><b>Access / Transport Issues</b> In developing policies for new schools, consideration should be given at an early stage in the site appraisal process as to how the use of public transport, cycling and walking can be encouraged to help reduce the number of car journeys to and from new schools. The inclusion of a well-developed green travel plan can help to ensure</p>	<p>Local Plan and will continue to do so.</p> <p>Surrey County Council, who compiled the Education Review (2016) were consulted regarding proposed amendments to education provision and planning following the Reg. 19 consultation in 2016. These amendments were incorporated into the Submission Local Plan, Strategy and Sites 2017, which was circulated to the EFA for comment.</p> <p>Site selection involved the assessment of transport opportunities and constraints for potential sites including vehicular, pedestrian and cyclist access/egress.</p> <p>It is at the planning application stage that the detailed</p>

Organisation	Relevant duty to cooperate representations	GBC response
	that new schools are better integrated with existing communities.	traffic impacts of a proposal for new development will be assessed through the provision of a Transport Statement or Transport Assessment and a Travel Plan in accordance with Policy ID3 and the NPPF.
Education and Skills Funding Agency (2017)	<p>The ESFA is supportive of the proposed changes to the Local Plan with regard to planning proactively for the provision of new schools.</p> <p>The ESFA welcomes the addition of para 4.6.49a recognising that national planning policy requires great weight to be given to the need to create, expand or alter schools to meet the needs of existing and proposed communities. This was a point we highlighted in our response to the 2016 consultation document.</p> <p>The ESFA supports the clarification of requirements regarding secondary school provision in policies A25 and A26; and the clarification of requirements for developer contributions towards education provision in policy A29.</p> <p>The clarification of education infrastructure requirements, including delivery agents, costs and funding sources in the Infrastructure Schedule (Appendix C) is also supported. This is important to ensure that developers have a clear understanding of the requirements placed on them to deliver this critical supporting infrastructure. It also provides clarity for the Local Education Authority and Department for Education as to what infrastructure is anticipated to be needed and when, aiding a coordinated approach to forward planning and delivery.</p> <p>Lastly, the ESFA welcomes the addition of a reference to the council's 'Education Review' document (May 2016) in the Evidence</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted. Surrey County Council were engaged on, and are comfortable with, the proposed changes reflected in the</p>

Organisation	Relevant duty to cooperate representations	GBC response
	base section (Appendix D), a key evidence base document that we highlighted in our previous comments. If this is updated prior to the Strategy and Sites examination we would request sight of this once published.	Submission Local Plan with regard to Education Provision as reflected in the Submission Local Plan, Strategy and Sites (2017). The ESFA will be engaged should Surrey County Council update the Education review.
Gatwick Airport (2016)	Guildford Borough is outside of our 15km 'physical' safeguarding area but is within our 30km wind turbine safeguarding zone. Therefore should any wind turbines be proposed in the Guildford Borough we would ask that the airport be consulted at an early stage, as they have the potential to interfere with radar utilised by the airport.	Noted. There are no proposals for wind turbines in the Proposed Submission Local Plan.
NATS (2016)	<p><b>Policy A35</b>  NATS has reviewed the Local Plan. While we acknowledge that reference to our DVOR/DME installations is made on page 206, our preference would be to include a statement as follows:</p> <p>“The airfield site hosts an aeronautical navigation beacon, known as the Ockham DVOR/DME. This is an integral part of the UK aeronautical infrastructure and serves a number of major airports in the South East. When considering planning application(s), engagement with the operator (NATS En Route PLC) should be sought as early as practicable in order to ensure that any impact is assessed and that the appropriate conditions and obligations to planning permission(s) can be attached.”</p> <p>in the table on page 205 'POLICY A35: Land at former Wisley airfield, Ockham' under the REQUIREMENTS entry.</p> <p>This is to highlight the importance of the aeronautical infrastructure and to ensure engagement with NATS is as early as possible should</p>	Noted. Wording has been included in the site policy as suggested.

Organisation	Relevant duty to cooperate representations	GBC response
	the current plans for the area be subject to alteration in any way.	
NATS (2017)	<p><b>Policy A35</b> NATS is satisfied that its comments have been incorporated, specifically around the NATS owned DVOR/DME Aeronautical Beacon at Wisley airfield.</p>	Noted.
Network Rail (2016)	<p><b>Policy H2</b> We recommend that the Council amend the policy or the viability section of the reasoned justification on affordable homes to allow flexibility on the required percentage of affordable homes on developments which are making extraordinary contributions to infrastructure or transport works.</p> <p>The Council has the means to review individual project circumstances using Viability Assessments in order to determine the appropriate level of affordable housing on each such site. If the need for flexibility on such sites is not maintained, they may be blighted by not being able to create financially viable developments.</p>	<p>Paragraph 4.2.39 of the viability section states that the Council expects developers to take the cost of infrastructure requirements into account in the price paid for the sites they are intending to develop. If, however, there are exceptional infrastructure or other costs that would make a scheme genuinely unviable if the full 40% affordable housing on-site, off-site or financial equivalent contribution is to be paid, then the council will consider varying the tenure mix and/or number of affordable homes required on a site. Paragraph 4.2.39 – 4.2.40 clearly outlines this intended approach.</p> <p>The option to seek a variation from the normal affordable housing contributions would therefore be a matter of negotiation with the Council. The cost of any financial appraisals must, however, be borne by applicants, whether these are prepared by the Council or by developers themselves. This system of raising affordable housing contributions is sufficiently flexible and ensures maximum provision of affordable housing towards meeting the considerable local need, whilst at the same time ensuring that all sites remain viable.</p>

Organisation	Relevant duty to cooperate representations	GBC response
Network Rail (2016)	<p><b>Policy ID1</b>  Network Rail encourage the Council to include contributions towards the delivery of station improvements and new stations in the CIL and retain the flexibility in the application of a CIL levy such that where a site is already directly contributing to infrastructure or transport improvements it would not be further burdened by CIL contributions. The rationale for this is to not blight development of such sites which may become financially unviable if the combined CIL, S.106 and affordable housing burden is too great.</p> <p>We would request that a balanced approach to infrastructure be applied and suggest that it would be appropriate to delete paragraph 4, allowing the Council address the nature of each development site and proposal as appropriate.</p>	<p>In the Draft Local Plan 2017, in the Infrastructure Schedule at Appendix C, all instances of ‘developer contributions’ were changed to ‘developer funded’ in the column for ‘Likely cost (where known) and funding source’. The term ‘developer funded’ encompasses:</p> <ul style="list-style-type: none"> <li>• direct improvements made by developer(s) including under a S278 Agreement (Highways Act 1980)</li> <li>• funding provided by developer(s) by way of Section 106 agreement (Town and Country Planning Act 1990)</li> <li>• funding provided by developer(s) by way of Community Infrastructure Levy (CIL) contributions.</li> </ul> <p>Therefore the Infrastructure Schedule provides flexibility as to the means by which appropriate schemes will be, in part or in full, developer funded. Further consultation on CIL will be undertaken in preparation for introducing the levy in Guildford borough. The Regulation 123 list (to be developed) is intended to provide greater clarity on what infrastructure items CIL may be spent on and where s106 obligations would not be sought.</p> <p>The protection of the SPA from the impacts of development is enshrined in law. Therefore, unlike other planning obligations, protection of the SPA is non-negotiable and it is appropriate that priority is given to the SPA over other contributions.</p>

Organisation	Relevant duty to cooperate representations	GBC response
Network Rail (2016)	<p><b>Policy A2</b> We suggest that in the Requirements and Opportunities section the Council may wish to consider the car parking requirements and opportunities of this location in close proximity to both the town centre and Guildford Railway Station.</p> <p>As such, we suggest the following amendment in the Opportunities section to read as follows: “Improve the links along the river and to and from the town centre <u>and to and from the railway station.</u>”</p>	Wording amended as suggested.
Network Rail (2016)	<p><b>Policy A3</b> Following recent discussions with the Council about the potential for this site, we would request that an additional opportunity be added that it may be possible to configure the site to incorporate some rail related car parking (subject to access requirements being resolved).</p>	This is not part of the car parking strategy for Guildford.
Network Rail (2016)	<p><b>Policy A5</b> We request that an additional requirement be added to contribute through any S.106 agreement to funding station improvements.</p> <p>The rationale is that development close to the station is likely to place an increased passenger load on the station.</p>	The Council will not be amending the policy on this site to specifically mention funding station improvements, as until an application is submitted the impacts on the station itself cannot be adequately defined. All development in Guildford could increase passenger load on the station.
Network Rail (2016)	<p><b>Policy A7</b> Based on the extensive analytical work by Solum Regeneration (Guildford) LLP, working closely with Network Rail to identify what would constitute a viable proposal on this site, we request the following amendments to this policy: Allocation bullets amended to read:</p>	Requirement (1), which was added in the Draft Local Plan 2017, provides for ‘Improved transport and interchange facilities having regard to the Sustainable Movement Corridor Supplementary Planning Document’.



Organisation	Relevant duty to cooperate representations	GBC response
	<ul style="list-style-type: none"> <li>• Improved transport and interchange facilities</li> <li>• Approximately 450 homes (C3) dwellings</li> <li>• Additional retail (convenience and comparison) and food and drink offer and</li> <li>• Additional complementary offices and leisure uses</li> </ul>	<p>The quantum of development has not been increased as this scale is not considered appropriate at this site.</p>
<p>Network Rail (2016)</p>	<p><b>Policy A8</b>  In relation to land on the west side of Guildford Station a statement has been included earmarking the land for future station expansion which we are pleased about. Although future development may include housing we are keen that the site does not become too constrained by development that we are unable to expand the station in the future. Network Rail are working with local authorities, LEP's and MP's to develop a coherent and joined up strategy for Guildford Station that will include the expansion of platform capacity that is likely to require some of the land to the west.</p> <p>Furthermore, either in the allocation or requirements the policy should refer to the current rail Maintenance Delivery Unit (MDU):</p> <ul style="list-style-type: none"> <li>• The MDU is currently required to be on site.</li> <li>• It is possible that in the future some elements of the unit may be relocated to the Route Operating Centre but it is expected that there will always be a need for at least part of the unit to remain on site and for the rail maintenance teams to gain access to the railway from the land on the west side of Guildford Station.</li> </ul> <p>In the opportunities, we suggest the following:</p> <ul style="list-style-type: none"> <li>• Amending the first bullet point to read: In combination with realising the Guildford platform capacity scheme, there is a potential opportunity to redevelop this site for station car</li> </ul>	<p>Wording added to opportunities to enable maintenance access.</p> <p>Amended wording in Opportunities to include retention of some station car parking and "employment" uses amended to "commercial" uses.</p> <p>The access from the Guildford Park Car Park site (Policy A11) to the Land west of Guildford railway station site (Policy A8) has been closed for a number of years and there is alternative access to the Policy A8 site. The landowners of the sites could seek to negotiate an easement.</p> <p>It is considered that the Allocation is not incompatible with the retention of the Maintenance Delivery Unit, in part or whole.</p> <p>The Council considers that there is sufficient flexibility provided by the existing wording of the second opportunity and the provisions of Policy ID1.</p>

Organisation	Relevant duty to cooperate representations	GBC response
	<p>parking, housing, student housing and / or employment uses and (limited) retail.</p> <ul style="list-style-type: none"> <li>• There is an opportunity for the Council to re-open the rail maintenance access adjacent to the old signal box site from the road through the Guildford Park Car Park. This would potentially allow all or part of the MDU to be relocated further to the north, thus enabling continued rail maintenance access and helping to bring forward development of the A8 site.</li> <li>• Amending the second bullet point to read: <ul style="list-style-type: none"> <li>○ Subject to funding being provided by the beneficiary development and future railway requirements, create a new pedestrian and / or cycle route on the west side of the railway tracks between the Guildford Park Car Park Site.</li> </ul> </li> </ul>	
<p>Network Rail (2016)</p>	<p><b>Policy A11</b>  Network Rail has made separate representations on the current planning application for this site. It has the potential to help unlock development on the A8 site on the west side of the railway station and to support rail maintenance access requirements.  We would therefore request the policy be amended as follows:</p> <ul style="list-style-type: none"> <li>• Add a requirement to either re-open vehicle access to the railway from the road, adjacent to the current garages and the old signal box location or to provide for this to be re-opened in the future.</li> <li>• Add a requirement to make a financial contribution to a fund for the future delivery of improvements to the west side of the station and the footbridge as future residents on this site are likely to use the railway footbridge and station, adding to the burden of congestion on the bridge.</li> <li>• Add an opportunity to increase public parking on site which</li> </ul>	<p>These changes are not considered necessary.</p> <p>The access from the Guildford Park Car Park site (Policy A11) to the Land west of Guildford railway station site (Policy A8) has been closed for a number of years and there is alternative access to the Policy A8 site. The landowners of the sites could seek to negotiate an easement.</p> <p>The tests for a planning obligation such as that requested by Network Rail have not been demonstrated in the Local Plan-making process. At the planning application stage, there will be further consideration of the transport impacts of any proposal for new development, and new development will be required to provide and/or fund the</p>

Organisation	Relevant duty to cooperate representations	GBC response
	<p>would be compatible with supporting sustainable rail journeys by rail.</p>	<p>provision of suitable access and transport infrastructure and services that are necessary to make it acceptable. This is set out in Policy ID3.</p> <p>The site is currently occupied as a Council owned and operated surface level car park, which has 400 vehicle spaces and four coach spaces. The allocation includes a multi storey car park with appropriately 450 parking spaces.</p>
Network Rail (2016)	<p><b>Policy A25</b> We recommend that the allocation and requirements be amended to include provision of additional car parking spaces for rail users of the proposed railway station in order to increase the passenger catchment and therefore viability of a station in this location.</p>	<p>Surrey County Council, the Local Highway Authority, and landowner of the site on the opposite side of the railway line, has indicated that significant car parking at the rail station or the creation of a parkway-type rail station would not be supported. Rather, Surrey County Council considers it important to provide sustainable links to the new station.</p> <p>The Submission Local Plan does not specify a level of car parking at the rail station.</p>
Network Rail (2017)	<p><b>Policy A3</b> As stated in the requirements there is a signal box on the site so it is important that any aspirations to develop the site take account of the Wessex Route's plan for re-controlling all signalling into the Basingstoke ROC.</p> <p>Network Rail are currently working closely with Guildford Borough Council to specify and remit a study that will look at all railway land requirements around Guildford to ensure that sufficient land is</p>	<p>Noted. We have assumed that the site will be brought forward in years 11-15 of the Local Plan. Network Rail's National Operating Strategy (Basingstoke Rail Operating Centre) project, to consolidate all signalling and control activity into the Basingstoke Rail Operating Centre, is being implemented in Control Period 5 (2014 – 2019) (Network Rail, March 2016, Route Specifications: 2016 Wessex). The timing of Network Rail's project is</p>

Organisation	Relevant duty to cooperate representations	GBC response
	<p>available to provide the infrastructure to meet growth and demand on the railway (potentially in the form of additional platform capacity).</p> <p>This study will help to ascertain the land available for development and is an important example of how Network Rail is working closely with our stakeholders to identify land that can be utilised to meet the needs of the railway and the wider community.</p>	<p>therefore in advance of the assumed redevelopment of the site.</p> <p>We would expect that Network Rail, as the owner and promoter of this site, would be best placed to bring consolidation of all signalling and control activity into the Basingstoke ROC.</p>
Network Rail (2017)	<p><b>Policy A7</b> This site has previously been included in the Solum property development scheme at Guildford and is currently on hold while the appeal process is carried out following planning permission being denied.</p> <p>Any plans to develop the site should take account of railway requirements relating to the station building and the need for it to be able to accommodate future growth in passengers. In addition any proposals should also address the permeability of the site from east to west via the footbridge.</p> <p>Network Rail are developing a scheme to provide a Platform 0 on the east side of the station so it is important that any proposed development does not prevent this scheme from progressing once funding is available.</p> <p>Network Rail are currently working closely with Guildford Borough Council to specify and remit a study that will look at all railway land requirements around Guildford to ensure that sufficient land is</p>	<p>Noted.</p> <p>Requirement (1), which was added in the Draft Local Plan 2017, provides for 'Improved transport and interchange facilities having regard to the Sustainable Movement Corridor Supplementary Planning Document'.</p> <p>In addition, it is considered that Network Rail, as the site owner, is able to bring forward plans to redevelop the site taking account of future railway requirements.</p> <p>Noted.</p> <p>Noted. We will continue to work with Network Rail on this matter.</p>

Organisation	Relevant duty to cooperate representations	GBC response
	<p>available to provide the infrastructure to meet growth and demand on the railway (potentially in the form of additional platform capacity).</p> <p>This study will help to ascertain the land available for development and is an important example of how Network Rail is working closely with our stakeholders to identify land that can be utilised to meet the needs of the railway and the wider community.</p>	
Network Rail (2017)	<p><b>Policy A8</b> This site has strong links to Policy A7, particularly in respect to ensuring permeability across the station between east and west sides via the footbridge. As noted in the Local Plan this land has a number of operational uses that will need to be consider in any decision on allocating this site for development.</p> <p>It should also be noted that the land included in this site could have potential future railway use for additional platform capacity to meet future demand and growth at the station.</p> <p>Network Rail are currently working closely with Guildford Borough Council to specify and remit a study that will look at all railway land requirements around Guildford to ensure that sufficient land is available to provide the infrastructure to meet growth and demand on the railway (potentially in the form of additional platform capacity).</p> <p>This study will help to ascertain the land available for development and is an important example of how Network Rail is working closely with our stakeholders to identify land that can be utilised to meet the needs of the railway and the wider community.</p>	<p>Opportunity (2) for the creation of a new pedestrian and cycle route was amended in the Draft Local Plan 2017 to state that ‘this could also serve as a maintenance access to the signal box adjacent to Guildford Park Car Park’. Network Rail’s response is considered to be consistent with this change.</p> <p>Noted.</p> <p>Noted. We will continue to work with Network Rail on this matter.</p>

Organisation	Relevant duty to cooperate representations	GBC response
Network Rail (2017)	<p><b>Policy A10 and A11</b> Network Rail are currently working closely with Guildford Borough Council to specify and remit a study that will look at all railway land requirements around Guildford to ensure that sufficient land is available to provide the infrastructure to meet growth and demand on the railway (potentially in the form of additional platform capacity).</p> <p>This study will help to ascertain the land available for development and is an important example of how Network Rail is working closely with our stakeholders to identify land that can be utilised to meet the needs of the railway and the wider community.</p>	Noted. We will continue to work with Network Rail on this matter.
Network Rail (2017)	<p><b>Policy A25</b> Network Rail are currently working with Guildford Borough Council and Martin Grant Homes on their aspiration for a station within this site. Network Rail and South West Trains, as part of the Wessex Alliance, signed a letter stating that we did not believe that the addition of another station on the Guildford New Line would impact on current or future rail services adversely.</p> <p>The station was noted in the recent franchise announcement by the new franchisee South Western Railway (First/ MTR).</p> <p>We will therefore continue to work with the proposer of the new station as required and necessarily to ensure that railway requirements are taken account of.</p>	Noted.
Network Rail (2017)	<p><b>Policy A26 and A59</b> Network Rail have worked closely with Guildford Borough Council and other interested parties on a potential station within this site allocation. A GRIP 2 study was commissioned by Guildford Borough</p>	Noted.

Organisation	Relevant duty to cooperate representations	GBC response
	<p>Council that has looked at a location within this site and one within Policy A59 as potential new station locations.</p> <p>We will therefore continue to work with the proposer of the new station as required and necessary to ensure that railway requirements are taken account of.</p>	
Network Rail (2017)	<p><b>Policy A29</b> This site will impact adversely on the safe operation of the level crossing at Ash. Network Rail are working closely with Guildford Borough to investigate funding streams to facilitate the closure of the level crossing.</p> <p>CIL or Section 106 funding should be made available to help fund the closure of the level crossing as without its closure the level crossing will become prohibitively unsafe.</p>	<p>The Council and Network Rail both consider that the provision of a new road bridge is required to allow the realisation of the allocation in this site Policy.</p> <p>The scheme could be funded by CIL or Section 106 contributions.</p>
Network Rail (2017)	<p><b>General</b> On all land currently under Network Rail ownership then operational usage should be considered a priority. Access to the railway for operational use should also not be hindered or prevented by any development either on railway land or in land adjacent to the railway.</p> <p>The cumulative effect of a number of developments in the same area should always be assessed to ensure that the appropriate CIL or Section 106 funds can be allocated to railway projects where there is a resultant impact from those developments.</p>	<p>Noted. We have worked with Network Rail to understand their future operational requirements with respect to the three Network Rail-controlled sites that are allocated in the Submission Local Plan. In terms of future planning applications, we would expect that Network Rail, as the owner and promoter of these sites, would be best placed to consider their development in the context of its requirements for future operational usage.</p> <p>Rail schemes NR1, NR2 and NR3, which are included in the Infrastructure Schedule at Appendix C, will be 'developer funded' either in part or in full. The term 'developer funded' encompasses direct improvements</p>

Organisation	Relevant duty to cooperate representations	GBC response
	<p>As stated above, Network Rail are working closely with Guildford Borough Council to identify future land requirements around the Guildford Station area and develop a strategy that meets the needs of the railway and the wider community.</p>	<p>made by developer(s), funding provided by developer(s) by way of Section 106 agreement (Town and Country Planning Act 1990), and funding provided by developer(s) by way of Community Infrastructure Levy (CIL) contributions. Therefore the Infrastructure Schedule provides flexibility as to the means by which appropriate schemes will be, in part or in full, developer funded.</p> <p>All development in Guildford could increase passenger load on Guildford station. The impacts on Guildford station resulting from specific developments, and the appropriate mitigation or contribution, can be considered through the planning application process.</p> <p>Noted.</p>
Sussex and Surrey Police (2017)	<p><b>Vision and objectives</b> Surrey Police welcome the support and inclusion of ‘Strategic objective 3’ requiring all development to be of high quality design and enables people to live safe, healthy and active lifestyles.</p> <p>Surrey Police strongly recommend the addition of the following Strategic objective under the heading of ‘Society’:</p> <ul style="list-style-type: none"> <li>Reducing crime, anti-social behaviour and the perception of crime through the application of Secured by Design standards and attaining the Secured by Design award.</li> </ul>	<p>Noted.</p> <p>This to be too detailed and the aims of this are thought to be covered by strategic objective 3. Policy D4 Character and Design of New Development requires new developments to create attractive, safe and accessible places that discourage crime and disorder through design.</p>



Organisation	Relevant duty to cooperate representations	GBC response
	<p>Surrey Police are concerned over the existing core theme regarding infrastructure and the limited detail relating to other infrastructure providers with the exception of transport. There is no recognition to emergency services within strategic objective 12 or 13. Improving health, education, life-long learning and well-being of all sectors of the community will not be achieved if that same community is not safe, secure and does not have adequate access to the emergency services.</p> <p>To address these concerns, Surrey Police proposed strategic objective 12 is replaced with the following:</p> <ul style="list-style-type: none"> <li>• To facilitate the timely provision of social and physical infrastructure necessary to improve health, education, life-long learning, well-being, safety and security of all sectors of the community</li> </ul> <p>And / or</p> <ul style="list-style-type: none"> <li>• Linking new development where appropriate, to the improvement of health, education, life-long learning and the emergency services</li> </ul>	<p>These aspects are more adequately picked up in the 'society' core theme rather than the 'infrastructure' core theme which is more transport related.</p> <p>These aspects are addressed in strategic objective 2: To improve opportunities for all residents in the borough to access suitable housing, employment, training, education, open space, leisure, community and health facilities.</p>
Sussex and Surrey Police (2017)	<p><b>Policy ID1</b> Policy ID1 outlines the infrastructure necessary to support development and mitigate its otherwise adverse impacts. Policy ID1 does not state which types of infrastructure will be supported, however further explanation is given in the subsequent 'definitions' section.</p> <p>Guidance note 4.6.2 does states "Infrastructure is a very broad term. The Planning Act 2008 as amended defines infrastructure as roads and other transport facilities, flood defences, schools and other educational facilities, medical facilities, sporting and recreational</p>	Amended wording is included as a proposed Minor Modification.

Organisation	Relevant duty to cooperate representations	GBC response
	<p>facilities, and open spaces. Guidance on the CIL also advises that infrastructure also includes cultural and sports facilities, district heading schemes, police stations and other community facilities.</p> <p>The definition of policing infrastructure is however far more broad than ‘police stations’ and encapsulates a wide variety of infrastructure necessary for policing. For this reason, Surrey Police request ‘police station’ is replaced by ‘police infrastructure’.</p>	
Sussex and Surrey Police (2017)	<p><b>Policy E7</b> Ensuring the night time economy is well managed and controlled through effective planning is an essential to ensure crime and incidents of anti-social behaviour are minimised. Surrey Police recommend that the evening/night-time economy should be subject to a new specific planning policy with the Local Plan, as follows:</p> <p>‘Policy ?? – The Evening and Night-time Economy The Council will welcome development that create safe, balanced and socially responsible evening and night time leisure in the Borough. An enriched mix of uses will be encouraged to achieve this including late-night shopping, cultural and theatrical activities, cafes, restaurants, pubs and bars.</p> <p>Developments linked to the evening and night-time economy will be required to implement safeguards by contributing towards public realm, public transport and other infrastructure improvements to deliver a sense of well-being, safe and security. This will involve ensuring activity is facilitated during the daytime to avoid the clustering of ‘dead’ frontages.</p> <p>Working in partnership with the Council and other stakeholders,</p>	<p>It is considered unnecessary to include a policy specifically covering the evening and night-time economy in order for the Proposed Submission Local Plan to be sound. The key points within the suggested wording that could usefully be included in the Plan are already contained within a number of other proposed policies. For instance, point (1) (c) of Policy D4 requires all new developments to ‘create attractive, safe and accessible places that discourage crime and disorder’; whilst point (1) of Policy E7 supports mixed-use developments including town centre uses that contribute towards the liveliness of the town centre. It also restricts development in secondary frontages (bullet point 4) in where there will be a ‘loss of amenity in terms of noise, disturbance, smell, litter or traffic generation’.</p> <p>The suggested requirement for owners and operator of evening and night-time economy related development to take part in active management measures is onerous for site owners/occupiers, and difficult to enforce, particularly on changes of ownership or lease. In relation to the</p>

Organisation	Relevant duty to cooperate representations	GBC response
	<p>owners and operators of evening and night-time economy related development will be expected to take part in active management measures to help the public and support the emergency services. If the above is achieved no development on its own, or cumulatively with other uses, will create an unacceptable impact on neighbouring uses, residents or the surrounding area by reason of noise and pollution, light pollution, anti-social behaviour, crime, disturbance or traffic. In necessary planning conditions and legal agreement will be implemented to ensure this.'</p>	<p>suggestion to require developers to contribute towards public transport and other infrastructure improvements, arrangements to finance such improvements are agreed with developers on a case-by-case basis; however, they will be partly funded through the Community Infrastructure Levy (CIL) when this is adopted by the Council.</p>
<p>Sussex and Surrey Police (2017)</p>	<p><b>Policy D4</b>  <u>Secured by Design (SBD)</u>  Surrey Police recommend that Policy D4 should be amended to state that high quality design is expected in the borough. All developments will:  c) create attractive, safe and accessible places that discourage crime and disorder through design <u>and the application of Secured by Design standards.</u></p> <p><u>Access for emergency vehicles</u>  Surrey Police consider that reference to providing sufficient access for emergency service vehicles should be included within Policy D4 of the local plan. All developments will:  o) Ensure sufficient access is provided for emergency services – police, fire service and ambulance services.</p> <p>This is an important planning consideration for assessing new housing developments. Minimising obstructions to emergency vehicles is essential to help reduce response times and the ability of emergency services to access new homes and casualties in need. With new developments including adopted and non-adopted roads,</p>	<p>It is not considered appropriate to require the application of Secured by Design Standards. Reference in the key evidence box to 'Secured by Design, design guides' is included as a proposed Minor Modification.</p> <p>This is considered to be too detailed for the Local Plan: strategy and sites document and is more appropriate to be included within the forthcoming Development Management Policies DPD.</p>

Organisation	Relevant duty to cooperate representations	GBC response
	<p>developers should ensure that there are no obstructions or reductions in road widths which would impact the ability of emergency service crews to service developments. Providing reference to access for emergency services to new development within local planning policy is considered necessary to raise awareness of this issue and ensure compliance with the relevant paragraphs of the NPPF.</p>	
<p>Thames Water (2016)</p>	<p><b>Policy ID1</b> Thames Water support Policy ID1 and supporting text in principle as it is largely in line with previous representations, but consider that minor changes would be helpful to provide clarity.</p> <p>Thames Water support the Policy in principle as a key sustainability objective for the preparation of the new Local Plan should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure.</p> <p>Thames Water support the identification of water supply and waste water treatment infrastructure at paragraph 4.6.3, but given the importance of such infrastructure to sustainable development, it is considered that text along the following lines should be also included to support Policy ID1:</p> <p>“The Council will seek to ensure that there is adequate water supply, surface water, foul drainage and waste water treatment capacity to serve all new developments. Developers will be required to demonstrate that there is adequate waste water capacity and surface water drainage both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading</p>	<p>Noted.</p> <p>Noted.</p> <p>The suggestion regarding additional wording is considered to be too detailed for the policy.</p> <p>The Submission Local Plan’s Infrastructure Schedule (Appendix C) identifies key water and wastewater infrastructure to support planned growth during the plan period. Strategic site allocations included in the Local Plan cross reference these requirements.</p> <p>Furthermore, the requirement for timely provision of infrastructure is reinforced as a basis for approval of planning applications (see Policy ID1(3)).</p> <p>Comments are in many cases already included in the</p>

Organisation	Relevant duty to cooperate representations	GBC response
	<p>of existing wastewater/sewerage infrastructure. Drainage on the site must maintain separation of foul and surface flows. Where there is an infrastructure capacity constraint the Council will require the developer to set out what appropriate improvements are required and how they will be delivered.</p> <p>The development or expansion of water supply or waste water treatment facilities will normally be supported, either where needed to serve existing or proposed new development, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact that any such adverse impact is minimised.”</p> <p><b>Development Close to Thames Water Assets:</b> Where development is being proposed within 800m of a sewage/waste water treatment works, the developer or local authority should liaise with Thames Water to consider whether an odour impact assessment is required as part of the promotion of the site and potential planning application submission. The odour impact assessment would determine whether the proposed development would result in adverse amenity impact for new occupiers, as those new occupiers would be located in closer proximity to a sewage treatment works.</p> <p>Where development is being proposed within 15m of a pumping station, the developer or local authority should liaise with Thames Water to consider whether an odour and / or noise and / or vibration impact assessment is required as part of the promotion of the site and potential planning application submission. Any impact assessment would determine whether the proposed development would result in adverse amenity impact for new occupiers, as those</p>	<p>Infrastructure Delivery Plan, 2017 (IDP). Updates to the IDP will provide the opportunity to include further clarification as noted by Thames Water as well as responding to changing circumstances over time.</p>

Organisation	Relevant duty to cooperate representations	GBC response
	<p>new occupiers would be located in closer proximity to a pumping station.</p> <p>Where any such odour study in relation to development near a sewage treatment works or pumping station identifies there is an odour impact for proposed development and no improvements are programmed by the water company, then the developer needs to contact the water company to agree what improvements are required and how they will be funded prior to any occupation of the development.</p> <p><b>Sustainable Drainage:</b> Thames Water recognises the environmental and economic benefits of surface water source control, and encourages its appropriate application, where it is to the overall benefit of their customers. However, it should also be recognised that SUDS are not appropriate for use in all areas, for example areas with high ground water levels or clay soils which do not allow free drainage. SUDS also require regular maintenance to ensure their effectiveness.</p> <p>Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.</p> <p>SuDS not only help to mitigate flooding, they can also help to:</p> <ul style="list-style-type: none"> <li>• improve water quality</li> </ul>	<p>Policy P4(5) and the IDP make allowance for circumstances where SuDS are not considered appropriate and this Policy has been updated to require “that land drainage will be adequate...”</p>

Organisation	Relevant duty to cooperate representations	GBC response
	<ul style="list-style-type: none"> <li>• provide opportunities for water efficiency</li> <li>• provide enhanced landscape and visual features</li> <li>• support wildlife</li> <li>• and provide amenity and recreational benefits.</li> </ul> <p>With regard to surface water drainage, Thames Water request that the following paragraph should be included in the Masterplan: “It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.”</p>	
Thames Water (2017)	<p><b>Policy ID1</b> Thames Water still support the amended Policy I1 (now Policy ID1) and supporting text in principle as it is largely in line with previous representations, but consider that the additional text on water/wastewater infrastructure should still be included.</p> <p>Thames Water support the Policy in principle as a key sustainability objective for the preparation of the new Local Plan should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure.</p> <p>Thames Water support the identification of water supply and waste water treatment infrastructure at paragraph 4.6.3, but given the importance of such infrastructure to sustainable development, it is considered that text along the following lines should be also included to support Policy ID1:</p> <p>“The Council will seek to ensure that there is adequate water supply, surface water, foul drainage and waste water treatment capacity to</p>	<p>Noted. In this regard, a minor modification to the “Reasoned Justification” section under ID1 has been proposed, which seeks to add clarity on this matter, although not including the level of detail proposed.</p> <p>See also response to 2016 comments, The Submission Local Plan’s Infrastructure Schedule (Appendix C) identifies key wastewater infrastructure to support planned growth during the plan period. Strategic site allocations included in the Local Plan cross reference these requirements.</p> <p>Furthermore, the requirement for timely provision of infrastructure is reinforced as a basis for approval of planning applications (see Policy ID1(3)).</p>

Organisation	Relevant duty to cooperate representations	GBC response
	<p>serve all new developments. Developers will be required to demonstrate that there is adequate waste water capacity and surface water drainage both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing wastewater/sewerage infrastructure. Drainage on the site must maintain separation of foul and surface flows. Where there is an infrastructure capacity constraint the Council will require the developer to set out what appropriate improvements are required and how they will be delivered. The development or expansion of water supply or waste water treatment facilities will normally be supported, either where needed to serve existing or proposed new development, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact that any such adverse impact is minimised.”</p>	
<p>Thames Water (2016 and 2017)</p>	<p><b>Site policies</b>  Water treatment and wastewater/sewage treatment capacity maybe a constraint in some catchments within the Guildford Borough area. As the Local Plan is finalised we will be reviewing which of our treatment sites need upgrades to accommodate the growth and we are willing to have a meeting with the Council to discuss this.</p> <p>The 2016 and 2017 representations provides Thames Water’s site specific comments from desktop assessments on water supply and sewerage/wastewater infrastructure in relation to the proposed housing sites, but more detailed modelling may be required to refine the requirements.</p>	<p>Responses to TW comments related to ID1 are reflected in the consultation statement.</p> <p>Detailed site level comments (seen in the context of the broader TW comment) have informed:</p> <ul style="list-style-type: none"> <li>• the identification in the Infrastructure Delivery Plan of sites where water / waste water upgrades may or are likely to be required;</li> <li>• the identification of infrastructure projects, where relevant, in the Infrastructure Schedule of the Local Plan, specifically those relating to strategic sites.</li> </ul>



Organisation	Relevant duty to cooperate representations	GBC response
	<p>These sites have been assessed on an individual base with only limited opportunity to consider cumulative impacts. Therefore, the impact of multiple sites in the same area coming forward may have a greater impact. The scale, location and time to deliver any required network upgrades will be determined after receiving a clearer picture of the location, type and scale of development together with its phasing.</p> <p>Where we have identified sites where drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development, in the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure required to support the development.</p> <p>It should be noted that in the event of an upgrade to our sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade. As a developer has the automatic right to connect to our sewer network under the Water Industry Act we may also request a drainage planning condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the development. This will avoid adverse environmental impacts such as sewer flooding and / or water pollution.</p>	<p>TW comments are supported by:</p> <ul style="list-style-type: none"> <li>• minor modifications that GBC are proposed under ID1, reasoned justification supporting the approach reflected under Policy ID1.</li> <li>• the drafting of policies under ID1 to ensure the timely provision of infrastructure to support new development.</li> </ul> <p>It is acknowledged that demonstration of adequate waste water capacity and surface water drainage may only be possible subject to more detailed site level investigations.</p> <p>Where there is an infrastructure capacity constraint, the Council may use the planning system to ensure timely provision (e.g. the though the imposition of Grampian-style conditions or appropriate phasing).</p>

## **Appendix 8: Audit trail of ongoing cooperation**

1. AONB
2. Education
3. Employment
4. Flooding
5. Green and Blue Infrastructure
6. Green Belt
7. Health
8. Housing
9. Retail
10. SANG
11. Services and Utilities
12. SPA
13. Transport
14. Travellers

## Appendix 8: Audit trail of ongoing cooperation - AONB

Date	Partners engaged <i>Meeting/email/ telephone conversation</i>	Cross boundary issues discussed and any outcomes <i>Outcomes reached that affect GBC and other bodies</i>
21/06/13	Surrey Hills board, Surrey County Council	Evaluation of draft AONB candidate areas
3/7/13	Surrey Hills AONB Board, Mole Valley DC, Waverley BC, Tandridge DC, Reigate and Banstead BC, National Trust, Natural England	Light touch review of Management Plan. Officers Working Group spent a day of focusing on policies. An extraordinary board meeting should be arranged for the Core Funding Members to devote time to consider a review of the existing constitution as it was widely agreed it is not fit for purpose.
16/4/14	Surrey Hills board	Members agreed to commend the final draft of the Management Plan to respective local authorities for adoption, post consultation which received 600+ responses. (adopted by GBC on 28/10/14)
28/4/15	Reigate and Banstead	We consider the Surrey Hills AONB to be a shared strategic issue and we will continue cooperating on an ongoing basis through the work led by the Surrey Hills AONB Board.
27/6/16	Surrey Hills Management Board	Review and discussion of policy approach to the AONB in the Proposed Submission Local Plan. We will review the board's comments, alongside all other comments received during the regulation 19. Consultation, and consider making amendments to the plan as considered necessary
8/3/17	Mole Valley	Response to agree that natural environment is a strategic issue

## Appendix 8: Audit trail of ongoing cooperation - Education

Date	Partners engaged <i>Meeting/email/ telephone conversation</i>	Cross boundary issues discussed and any outcomes <i>Outcomes reached that affect GBC and other bodies</i>
26/07/13	Meeting: PWG/SCO	Pupil yield/projections methodology out of date (based on 2006 research) Pupil forecasting methodology, information gathering process SCC systems review Replacement system installed late 2013/2014 LA's to identify system changes, new data sources, frequency of requests
11/10/13	Planning for School Places, SCC and GBC	There are four strategic areas for school planning and Guildford is within the SW. Cllr Juneja raised concerns that how can GBC make sure that the expansion of schools/ new schools are in place when they are needed? Will be an issue in next few years as CBGB starts getting permission Ash Primary school has capacity to expand and numbers have recently been falling until baby boom. SCC advised that an academy or free school cannot be compelled to expand Discussion that timing is key as if school places are all provided for before the housing development is completed, spaces may not be available for children when they move in.
13/11/13	Workshop School Place planning data 'Pupil Yield Workshop' PWG, SCO	Information requirements Available housing data Predicting beyond 3 years difficult Local plan –different stages SCC – 4 geographical areas to monitor need, provision planning, examination and appeals SCC – new predictive 'pupil place planning system' SCC – existing pupil yield to be compared with 5 year census data, and new housing yield OR a survey – pupils attending state/private schools SCC – transport planning and assessment – impact of new development on school travel patterns & congestion SCC – PIC/Section 106 model – to be simplified SCC- new model uses ONS data, GP infant registration, housing forecasts and predictive housing/pupil yield data, plus migration factors

Date	Partners engaged	Cross boundary issues discussed and any outcomes
		<p>Boroughs to complete data fields, at ward level, 3 year completions and permissions, 10 year trajectory data by 20th December 2013</p> <p>Iterative process through 2014, first forecasts March 2014</p> <p>Data cycle August, verified December, final report February</p>
23/01/14	Email SCC to GBC	<p>Update on education provision for meeting on 24/1/14</p> <p>SCC – reviewed sites, recent approvals and SHLAA</p> <p>SCC – from April 2014 explore impact of sites using scenario testing available in new projection model – benefit SCC collection of developer contributions</p>
24/01/14	Meeting: SPOA	<p>Meeting costs of school places generated by development in Surrey</p> <p>Draft presentation – to be used until restrictions on 106 funding take effect (6 April 2015)</p>
24/01/14	GBC update (ref. Email from SCC)	<p>Ash/Tongham</p> <p>Impact on secondary provision – result of AUE</p> <p>Impact of army re-basing</p> <p>Guildford Town expansion options – north Guildford to meet projected demand</p> <p>Secondary school projections do not include local plan</p> <p>SCC – reviewed Guildford SHLAA and approvals</p> <p>SCC – Ash/Tongham area primary schools expansion in capital programme with options to meet future need</p> <p>SCC/HCC – monitoring ongoing need in Ash, new housing in Ash and AUE impact, army re-basing</p> <p>SCC – liaising with Admissions to ensure provision for Surrey children</p> <p>SCC – to firm up options for North Guildford</p> <p>SCC – secondary school projections do not include local plan growth. From April will use scenario testing (new projection model) to explore impact of sites on school provision</p> <p>SCC – will assist collection of s106 to reduce county borrowing</p>
19/02/14	Email SCC/GBC Specific impact – result of Issues and Options	<p>Projected demand, net local plan one site Worplesdon Primary School, Fairlands</p> <p>Land development impact</p> <p>Timings</p> <p>Likelihood</p> <p>25/2/2014 phone call</p> <p>May be difficult to discount at a later stage</p> <p>Land safeguarded in local plan</p>

Date	Partners engaged	Cross boundary issues discussed and any outcomes
		Flexford and Normandy - different catchment areas
26/03/14	Phone call	Clarity – local plan trajectory SCC – working with natural population growth SHLAA - 8000 new homes in Guildford Urban Area SCC – to talk to agents of strategic sites, to discuss secondary school potential locations – A1, A4, J4 strategic sites D2, H12
26/03/14	Email SCO/GBC	Update Guildford school infrastructure Ash/Tongham expansion Westborough County Primary St Paul's Primary
08/10/14	Meeting with Mole Valley and SCC	Mole Valley and Howard of Effingham should justify a one form entry primary school or some primary expansion options in MV Need to consider admissions criteria for neighbouring schools if housing in Horsley and Wisley are delivered prior to a new secondary school
17/04/14	Email	Waverley Wisley – impact on neighbouring authorities GBC suggest inviting neighbouring authorities to discuss SCC – need time to prepare
20/06/14	Meeting: PWG School Commissioning Overview	Robust evidence base to identify pupil yields from new developments and county developer contributions policy Edge-ucate Pupil Projection Model – data collection protocol Team contacts, structure outlined SCC considering a joint study with LA's to create a consistent, transparent evidence base approach to pupil yield forecasting – SEEDOG Steering Group set up at 27/3/14 meeting; 3/4/14 HCC, SCC, ESCC, Wokingham BC considered LA data and agreed to jointly commission, manage market research study. SCC invite LA's to participate in research brief. Status – awaiting bids InTrend. GBC – provided site location data, total dwellings, total phases, completion dates end June SCC - GBC and WBC have provided very detailed, ward level scenarios allowing us to plan
01/05/14	Meeting: Planning for School Places	Emerging Spatial strategy – numbers and locations Ash/Tongham primary school needs, Ash Grange Primary, St Paul's Secondary school sites

Date	Partners engaged	Cross boundary issues discussed and any outcomes
	SCO, SCC Estates, SCC Infrastructure, SCC Spatial Planning	<p>New Marsh Farm, Land parcels A1, A2, J4, D2, H12  Pond Meadow future  Update – SCC discussions with agents  Impact of strategic sites plus unknown growth in addition to that already modelled  Ash/Tongham primary school needs  Potential sites – secondary schools  Status on New Marsh Farm, A1, A2, J4, D2, H12 and Pond Meadow  SCC - Existing Guildford schools expansion – to meet existing projected demand, not new housing in local plan  SCC – met/ctc Wisley, Gosden Hill (consultants EFM) and Blackwell Farm willing to incorporate primary school, will to make contributions to secondary provision  SCC – will address need from urban extensions/in-fill once sites confirmed  SCC – additional option in north Guildford  Ash/Tongham – 1 strong option, 2nd option dependent on sites allocation/location  SCC – confirmed secondary need 4-5 FE by 2018 to meet existing primary need. SCC view – local plan needs to be addressed ‘further down the line.’  Sites identified through the Green Belt and Countryside Study in Issues and Options October 2013  Members talking to developers to encourage secondary provision  UTC option – additional 6th form Surrey wide provision  SCC - D2 has potential, Saltbox Road (A4) possible potential, New Marsh Farm A1, J4 no potential  Further assessments required – no objections raised – flood risk ecology and highways to be considered.</p>
29/04/14	Phone call Cllr Keith Taylor, Send ward	
12/05/14	Email Technical College, Chris Burchill, Gordon Jackson, Julie Stockdate	<p>Technical College potential  Bid in conjunction with Guildford College, local business, Royal Holloway, University of Surrey reviewing how it would complement, enhance local provision  Old Pond Meadow sites – potential location  SCC Properties in contact with GBC regards other sites, no favoured site as yet. Site visit at end of May.</p>
28/05/14	Email Cllr Keith Taylor	<p>New housing on green belt sites in Send – first five years  No infrastructure improvements</p>

Date	Partners engaged	Cross boundary issues discussed and any outcomes
		<p>Include two village schools within the settlement boundary            Junction improvements Send Road, Tannery Lane            Village car park – Tannery Lane sites</p>
27/06/14	Email GBC to KB	Accommodating inward migration to Guildford current forecast plus local plan impact
03/07/14	Meeting: D2C –SCC GBC Local Plan update	<p>Outline Guildford Local Plan            Primary and secondary school sites            SCC – waiting for new forecasting figures – available end July and researching new site with SCC Estates.            All agreed to D2C Education meeting with neighbouring authorities to review cumulative growth impact, using updated figures and review sites. Travel to school patterns. GBC to host.            GBC – Blackwell Farm – secondary school triggered if site increases to 3000 homes. Not needed and not balanced – undeliverable, unless core infrastructure built, bolt on classrooms at later stage            Saltbox Road has potential but too close to new Woking Free School            Owner of Clandon site has undertaken a transport survey.</p>
05/07/14	Infrastructure Co-ordination Meeting MJ, SCC, MG, GBC KP, TD, apologies Stephen Williams	GBC – proposed regular meetings to deliver infrastructure strategy and delivery of local plan
11/07/14	Keith Taylor email	<p>Proposed sites for secondary schools            Wisley            Gosden Hill            Clandon Park            Normandy and Flexford H12 discounted as safeguarded land</p>
30/07/14	Email MJ, GBC Heather, Flo, Laura	<p>Gosden Hill – proximity to Send, needs a defensible boundary            Clandon Park, in Green Belt, south Guildford</p>
08/08/14	Meeting: D2C Education SCO, SCC, Waverley, Woking,	<p>Cumulative demand/growth implications –GBC and neighbouring authorities            New sites - Guildford borough            Hot spots – Wisley/Cobham/Effingham, Woking/West Byfleet,            Forecasting methodology</p>



Date	Partners engaged	Cross boundary issues discussed and any outcomes
	Mole Valley	Impact of inward/outward migration, green travel plans GBC presented published site options –Clandon, Saltbox Lane, Ash Manor, strategic sites Gosden Hill, Blackwell Farm and Wisley. Green Belt Study identified all land unsuitable for housing. SCC – new forecasting system not making sense of local plan growth scenarios, need phasing data, mostly village sites by ward for years 1-5 GBC to SCC by 15th August SCC – preferred secondary school site - north edge of Guildford Town. SCC & GBC to meet by end August to review sites SCC – to circulate inward/outward migration flows, GBC to contact SCC Caroline Smith for travel to school plans current and forecast
08/01/15	Meeting of GBC and SCC planning officers to agree our preferred sites for new secondary schools	Links with Hampshire CC, Woking and Mole Valley
22/01/15	Meeting of GBC planning policy officer with SCC and Hampshire CC school commissioning officers to discuss cross boundary school place planning issues	Cross-boundary movements of school children between Hampshire CC and Surrey CC, and how this could be changed due to need for more school places from Guildford's draft new Local Plan.
14/05/15	Meeting with agent for Gosden Hill site	To discuss potential for a 4 FE secondary school on the site.
17/04/15	Meeting of GBC and SCC	School planning coordination.
03/07/15	Meeting with agent for Gosden Hill site	To discuss potential for a 2 FE secondary school (as part of a through school) on the site.

Date	Partners engaged	Cross boundary issues discussed and any outcomes
17/07/15	Rushmoor Local Plan Consultation	GBC is a net importer for school children from Rushmoor and the new Rushmoor Local Plan does not propose any secondary school provision to support planned level of development. Rushmoor should aim to seek to meet the need for any additional school places to alleviate pressure on Guildford.
13/08/15	Meeting of GBC and SCC planning and school organisation officers	Progress on school place modelling, draft emerging sites and preferred sites for each side of borough. List of agreed actions.
01/10/15	Meeting with agent and owner of Gosden Hill site	To discuss school potential in relation to the site.
14/06/16	Education Funding Agency	Email on Proposed Submission Local Plan and prompting response.
24/10/16	SCC Planning and School Place Commissioning officers, SCC's Lead Cllr for Learning and GBC's Planning Officers, Leader and Lead Cllr for Infrastructure	Meeting regarding school place planning and sites for the Local Plan period, in particular the Ash / Tongham area and movement of pupils between Hampshire and Surrey Counties. Discussed admissions criteria for Ash Manor (distance from home to school is third criteria for allocation of places, after looked after children and children with siblings already at the school).
03/11/16	Rushmoor Planning officer working with Hampshire School Commissioning Officers	<p>Confirmed that Surrey School Commissioning Officers have recently met with Hampshire School Commissioning Officers.</p> <p>Guildford and Rushmoor's Managing Director and Chief Executive (respectively) met, and discussed cross-border pupil movements and allocations, as well as plans for schools close to the boundaries.</p> <p>In particular, discussed future plans for Wavell School and Connaught schools in Hampshire, and Ash Manor School in Guildford, Surrey in light of planned and new housing development in Aldershot urban extension (and Grainger's request to not pay some of the S106 money for expansion of Connaught</p>

Date	Partners engaged	Cross boundary issues discussed and any outcomes
		school, which is to be rebuilt but at same size).
08/03/17	Mole Valley	Response to DtC scoping statement to agree that infrastructure, including education, is a strategic issue
06/03/17	SCC	SCC comments sought on working draft of changes to infrastructure policies.
08/03/17	SCC	SCC agreement on proposals in terms of early years, primary and secondary education provision. Confirmation that GBC proposed changes to the plan are acceptable to SCC.
17/07/17	Rushmoor	Response to Rushmoor Draft Submission Local Plan – should plan and seek to meet any additional school places required as a result of growth
06/09/17	SCC	Engagement on removal of site A41 from the Draft Local Plan due to concerns on deliverability.

## Appendix 8: Audit trail of ongoing cooperation - Employment

Date	Partners engaged <i>Meeting/email/ telephone conversation</i>	Cross boundary issues discussed and any outcomes <i>Outcomes reached that affect GBC and other bodies</i>
17/12/14	Woking and Waverley	The extent of the FEMA and whether further work is required. Raise at Surrey Planning Officers Association (SPOA)
8/12/14	Hart- email	Responded to Hart to confirm that our emerging ELA has no particular linkages with Hart although both sit within same LEP area
31/10/14	Surrey Heath- email	GBC agreed the need for including other authorities in discussions regarding future development. Agree that Surrey Heath, Rushmoor and Hart are an appropriate FEA. However Ash and Tongham are within GBC but sit within the Blackwater Valley As GBC are still developing its Local Plan, it may become increasingly necessary to consider Guildford borough as a key strategic employment area, which could alter the employment flow between the other Blackwater Valley districts. For this reason, these flows and the relationship between authorities in and the relations amongst the wider BWV area should continue to be monitored and the FEA revised if necessary
31/10/14	Rushmoor- email	Response to consultation on Site Appraisal Criteria - no justification for using 0.5ha as minimum threshold. Open to scrutiny regarding weighting of scoring
6/3/15	Waverley	Discussed importance of GBC's strategic sites including employment land to minimise commuting Some 70% of Waverley's employment is rural, Guildford's is approximately 25% Waverley's Economic Strategy has recently been completed and adopted GBC agreed to share its draft ELNA with Waverley (and also Woking's) planning officers
30/3/15	Runnymede	Responded to draft FEA Consultation. Agreed with the findings of the report - in particular that whilst both Guildford and Runnymede share functional links with Woking, there are not sufficient linkages between Guildford and Runnymede to require ongoing cooperation on employment needs.
28/4/15	Reigate and Banstead	Responded that we don't see any particular linkages between ourselves as we sit within different LEP and FEA
28/4/15	Runnymede	Agreed Runnymede was not in our FEA and employment is therefore not a strategic cross boundary issue

2/6/15	Waverley and Woking and Guildford Policy Managers	Discussed extent to which we agree the Functional Economic Area, and degree to which the three authority's ELAs cover the whole sub-area. Agree to share our joint sections with neighbouring authorities.
17/7/15	Rushmoor Local Plan Consultation	Support the proposed FEA and Joint Employment Land Review. Also support the proposal for engaging with GBC and Waverley to establish key economic areas.  Note that proposed employment growth does not have the homes necessary to support it. Amplified by the fact that it is unknown as to whether Hart/Surrey Heath are able to meet the Rushmoor unmet need. This may put pressure on surrounding HMAs
26/10/15	Waverley Employment Land Review Update	Responded to Waverley's ELR update. <ul style="list-style-type: none"> <li>• No reference to the Functional Economic Market Area (FEMA). Could include a brief reference to working with us and Woking.</li> <li>• Suggest use the same methodology as Guildford for rough calculation and comparison of figures. Based on some very rough calculations for Waverley this would mean an additional 11,000 sqm of B1a/b floorspace and an additional 7,700sqm of B1c/B2/B8. The amount of additional B1a/b floorspace you are proposing (15K sqm) is in line with these rough calculations but the B1c/B2/B8 (-30k) is very different.</li> </ul>
27/10/15	Berkshire Functional Economic Market Area Study and Economic Development Needs Assessment – Method Consultation	Agree with their sources of data and had no other comments.
29/10/15	Bordon in Hampshire	Meeting discussing their economic footprint and synergies with Guildford. CB suggested some areas of collaboration: <ul style="list-style-type: none"> <li>• Provide each other with regular updates on economic news and development/investment opportunities at Borough level</li> <li>• Co-ordinate and share inward investment enquiries to see if we can broaden the options and find out which businesses are important for supply chain development and sector growth</li> <li>• Provide a regular update on office and industrial space available or in the pipeline</li> <li>• Share delivery strategies/models for major housing and commercial sites as a way of sharing best</li> </ul>

		<p>practice</p> <ul style="list-style-type: none"> <li>• Perhaps arrange mutual site visits to get a better feel for localities and operating conditions</li> <li>• Provide each other with marketing collateral and prospectuses we could share</li> </ul>
21/10/15	DtC Woking and Waverley	<p>Agreed need to define a FEMA and level of employment need, as well as an approach to meeting unmet employment needs</p> <p>To agree a functional employment market area (FEMA) which each local authority meeting their own need figures as set out in the Employment Needs study. A short statement setting out these principles will be circulated to agree. To discuss the approach to areas where agreement cannot be reached</p>
12/1/16	Woking and Waverley	Each council to agree FEMA note internally and finalise consultation arrangements
22/02/16	Spelthorne, Runnymede, Elmbridge, Surrey Heath, Mole Valley, Rushmoor, Hart, Horsham, Chichester, East Hampshire, South Downs NP Authority, Surrey CC, Enterprise M3 LEP, Epsom and Ewell, Reigate and Banstead, and Tandridge	Consultation on the proposed West Surrey FEMA
5/4/16	Runnymede Local Plan	As agreed as part of the Duty to Cooperate Scoping Statement process, economic development is not a cross boundary issue between our boroughs.
14/6/16	Rushmoor	Agreed there are currently no outstanding strategic issues between GBC and RBC. Will be reviewed following publication of updated evidence.
17/8/16	Runnymede I&O	Proposed strategy will result in an excess of office employment space and a shortfall in industrial land. This may lead to unsustainable commuting patterns

30/08/16	Mole Valley FEMA	<p>Provided detailed email response on the Draft Mole Valley FEMA assessment. The response did not object to the FEMA (which identifies Mole Valley district as its own individual FEMA) but highlighted a few points where officers felt further justification was required to support the assertions made and pointed out a new source of information which could be used.</p> <p>The draft FEMA recognised commuting connections between the two boroughs and the recent identification of the West Surrey FEMA, of which Mole Valley are not a part.</p>
3/11/16	Spelthorne FEA	<p>Welcomed the recognition of the limited linkages between Spelthorne and Guildford and agreed that stronger interactions are evident between both Councils and other Local Planning Authorities. Referenced the latest Enterprise M3 Commercial Property Market Study (July 2016)</p>
02/2/17	Surrey Heath	<p>Response to their DtC scoping statement - notes the linkages that exist between our FEMA and Hart, Rushmoor and Surrey Heath.</p>
07/03/17	Mole Valley	<p>Responded to the DTC scoping statement – No linkages between FEMAs or LEP area, therefore no further specific cooperation is needed at present.</p>
17/05/17	Rushmoor	<p>Duty to Cooperate meeting: Confirmed no outstanding Duty to Cooperate issues, but continue to remain engaged in ongoing discussions as respective Local Plans progress.</p>

## Appendix 8: Audit trail of ongoing cooperation - Flooding

Date	Partners engaged <i>Meeting/email/ telephone conversation</i>	Cross boundary issues discussed and any outcomes <i>Outcomes reached that affect GBC and other bodies</i>
16/7/14	EA, Capita, Highways	<p>Kick off meeting to discuss new SFRA with Capita, EA and GBC. Thames Water and Surrey CC invited but did not attend. The meeting set the scope of the works and the requirements in terms of outputs. The EA gave a large amount of input and lead to a more strategic outlook dealing with river catchments over a wider area.</p> <p>Discussion surrounding impact of difference between hydrological catchment boundaries and political council boundaries Important to consider adjacent / local boroughs and catchments and recognise that development outside of the boundary can have an impact within the Guildford Boundary</p>
23/12/14	EA	<p>Call with the EA, and email from EA providing feedback on draft SFRA. The EA highlighted areas where they'd like to see improvements, particularly in the scope and depth of the document. The EA also provided missing information to improve the document.</p>
23/01/15	SPOA	<p>SUDS - SCC gave introduction and repeated the ministerial announcement that it was coming in 6th April with the duty on SCC with no funding. The DCLG would issue further guidance and SPOA asked for views. It was agreed:</p> <p>Unified front needed by districts and county, administrative, financial, engineering and monitoring , maintenance model required. Emphasis on economic viability of the engineering design meant that had to be evaluated and considered with long term maintenance requirement and cost. The National Design Standards with non statutory guidance need to be supplemented. Different districts different conditions and capability but needed to present united front to developers. Enforcement standards required together with dowry package to pay for maintenance and repair but liability falling back on property owners for which step in rights required. Adoption process? Whats the best management model and should it be cross border?</p> <p>SCC to liaise but DMs leading with workshop 06/02 and they need an agenda and delivery targets to get</p>



		the process moving for early implementation. Need to consider governance and implementation timetable.
6/3/15	Waverley	Discussed river flooding, particularly along River Wey, and PINs strict approach to flood zones. Need to agree a joint position on flooding
28/4/15	Reigate and Banstead	We have a very short stretch of the River Mole running through our borough so do not consider flooding a strategic issue
22/10/15	EA, SCC, GBC Engineer and Planner, Thames Water, Network Rail (Guildford Flood Risk Management Group)	<b>Surface Water Management Project Board meeting</b> Discussed hotspots, funding and implementation of mitigation works. Need clarity on preferred method of decision making. Request that GBC Engineer have the option to be included in all major pre-app discussions and in pre-app discussion on any sites in identified surface water flooding hotspots. Decision that this group is subordinate to the Surrey Flood Risk Partnership Board. Outlined purpose of the MOU Looked at 4 sites that are key projects.
6/11/15	Environment Agency, National Trust, GBC officers	Discussion in relation to delivery of proposals in the TCMP, working in partnership with the EA to look at key sites, particularly Bedford Wharf, to see if on a site at high risk of flooding, low risk uses could be provided (leisure, commercial). If betterment is achieved across the town centre area, and that flood risk is reduced on site. Further meetings planned.
19/11/15	EA, ARUP, GBC	Discussion around compensation methods and extent of Functional Flood Plan with regards to Bedford Wharf and cinema. There are options to model but will be challenging
14/6/16	Rushmoor	Agreed there are currently no outstanding strategic issues
06/09/16	EA, GBC	Discussion of EA's consultation response to Proposed Submission Local Plan (2016)
2/2/2017	Surrey Heath	DtC scoping – alerted to the WQA which we will share in due course.
17/05/17	Rushmoor	Duty to Cooperate meeting: Confirmed no outstanding Duty to Cooperate issues, but continue to remain engaged in ongoing discussions as respective Local Plans progress.
28/4/17 and 2/10/17	Bracknell Forest Council, AECOM (emails)	Agreed to allow AECOM to release modelling data used for Council's Water Quality Assessment to Bracknell Forest Council to use in their Water Cycle Study.

May 2017	EA	AECOM consulted the EA and Thames Water on the WQA
Sept – Nov 2017	EA	Ongoing discussion regarding an update to the Level 2 SFRA to respond to comments made by the EA to the Proposed Submission Local Plan (2016). Explored whether it could be done by the EA but due to resources it was undertaken in house with their sign off.

## Appendix 8: Audit trail of ongoing cooperation – Green and Blue Infrastructure

Date	Partners engaged <i>Meeting/email/ telephone conversation</i>	Cross boundary issues discussed and any outcomes <i>Outcomes reached that affect GBC and other bodies</i>
23/1/15	SPOA- Surrey Nature Partnership	<p>A discussion followed primarily in relation to the biodiversity off setting proposals and the links through the Environment Bank, concerns about links to CIL and the legal justification for pursuing the case with applicants. It appeared that larger sites might be less problematic than small ones. It was considered useful to have the debate and to see whether there is a solution that would work in Surrey.</p> <p>It was agreed that a Biodiversity Off-setting working group would be set up under the auspices of John Edwards (SCC) to explore if a workable approach to the issue can be devised to operate in all circumstances and to report back to SPOA. Group to include a Policy and DM planner. It was recognised this might have to be a lesser priority than the current SUDS work.</p> <p>Actions:</p> <ul style="list-style-type: none"> <li>i) PWG and DM Group to each nominate a member for the group and names to be forwarded by the respective chairs to John Edwards.</li> <li>ii) Biodiversity working group to meet and report back to SPOA in due course</li> </ul>
07/12/15	Surrey Nature Partnership/Surrey Wildlife Trust – meeting	Met with representative of Surrey Nature Partnership and Surrey Nature Partnership to discuss the emerging BOA approach to conserving nature at a landscape scale. The approach was explained along with how BOAs are identified and can be supported. Discussion followed on how the approach can be integrated into Local Plans and implemented on the ground by developers, but also how it can be implemented on the Council's own estate.
16/02/16	Surrey Nature Partnership	Follow up meeting with two representatives of the Surrey Nature Partnership. Topics discussed: delivery of works on sites identified as potential biodiversity enhancement sites, the Former Wisley Airfield and biodiversity, criteria for selecting biodiversity enhancement sites.
17/05/16	Guildford Open Space Study- Community and	<p>Identified cross border issues</p> <ul style="list-style-type: none"> <li>• Rushmoor- river forms a barrier</li> </ul>

stakeholder consultation	<ul style="list-style-type: none"> <li>• Surrey Heath- Deepcut development with SPA and SANG in Guildford</li> <li>• Woking- linkages between with SPA.</li> <li>• Elmbridge- proposed Wisley airfield abuts this boundary</li> <li>• Mole Valley- Effingham Village is Close to Bookham Village potential Green Belt release in these areas</li> <li>• Surrey Hills AONB covers majority of southern part of borough</li> </ul>
<ul style="list-style-type: none"> <li>• Elmbridge</li> </ul>	<p>Continued requirement and need to protect and mitigate the impacts of development on the Thames Basin Heaths SPA. On-going engagement and buying to the Joint Strategic Partnership Board and the provision and management of Suitable Accessible Natural Green Space (SANG). The nearest settlement within Elmbridge to Guildford Borough is Cobham &amp; Oxshott. The deficiencies in provision of children’s play space, public parks, natural green space and allotment provision within the area are localised and given the distances to Guildford Borough, will not be provided for across the Borough boundary. Ockham Common is dissected between the two Boroughs by the M25 and the A3 Wisely Junction. Any surveys of this area and its planned management should consider the area as a whole. Local Green Space – local designation and given the distances between the two authorities and the settlement areas, any designations in Elmbridge Borough are unlikely to have an impact (positive or negative) on Guildford Borough.</p>
<ul style="list-style-type: none"> <li>• Rushmoor</li> </ul>	<p>Delivery of Blackwater Valley Countryside Strategy requires action from Rushmoor and Guildford Councils An important cross boundary issue is Thames Basin Heath SPA Mitigation - Guildford Borough Council and Rushmoor are involved in ongoing discussion about the use of a possible shared SANG at Tongham Pools. The most significant open space / countryside cross boundary issue between our two authorities is planning to protect the Thames Basin Heaths Special Protection Area.</p>
<ul style="list-style-type: none"> <li>• Surrey Heath</li> </ul>	<p>May wish to bear in mind emerging development at PRB Deepcut, which includes provision for a 7ha sports hub.</p>
<ul style="list-style-type: none"> <li>• Waverley</li> </ul>	<p>No issues identified</p>

	<ul style="list-style-type: none"> <li>• Woking</li> </ul>	Opportunities for improved cross-border green infrastructure and wildlife habitat connectivity. Playing Pitch Study currently being updated
14/06/16	Rushmoor	Agreed there are currently no strategic issues
20/06/16	Hants	Emailed to request their opinion on our GI policy in Local Plan I4. Asked if they would be interested in meeting to discuss BOA and Black Water Valley going forward.
14/07/2016	Various environmental stakeholders	Event held at County Club in Guildford hosted by mayor of Guildford for bodies involved in environment and development. Event set out that how we value our countryside and landscapes in economic terms, including health outcomes is becoming increasingly important. Key note speaker from the Surrey Nature Partnership to discuss Natural Capital Strategy followed by discussion between stakeholders.
20/07/2016	Email/Phone Call	Call with Steve Bailey of Blackwater Valley Partnership. Discussed possible cooperation over BWV. Steve advises wants to increase cooperation between affected authorities through the partnership to deliver improvements to BWV. Sent links to policy I4 of the proposed Submission Local Plan for his review as a starting point. Committed to future contact as work on GI develops.
17/08/16	Runnymede I&O	Other options should be available to conserve and enhance biodiversity, aside from LGS and BOA, such as those mentioned in the supporting text (SNCI or LNR)
2/02/17	Surrey Heath	Responded to dtc scoping – referred to BOA approach developed by Surrey Nature Partnership

## Appendix 8: Audit trail of ongoing cooperation – Green Belt

Date	Partners engaged <i>Meeting/email/ telephone conversation</i>	Cross boundary issues discussed and any outcomes <i>Outcomes reached that affect GBC and other bodies</i>
12/7/13	Woking	Gave comments on their proposed GB review methodology. Mentioned that setting an arbitrary time span (2040) may lead to sites remaining in GB even if they do not contribute to its purposes. Would be better to assess all land. Not clear whether the study would consider the contribution to the open character of a village makes to the openness of the countryside and whether it should be washed over. Taken purpose 2 too literally and only looked at towns and larger villages only Purpose 4 again to literally taken, we applied a broader sense of the meaning and applied to towns and villages.
2/5/14	Surrey Heath via email	Potential change of Bisley Camp boundary. Surrey Heath saw no justification for this
6/3/15	Waverley	Both authorities have completed green belt studies G and W came to different conclusions on green belt release around Godalming Waverley is not likely to propose any GB boundary changes.
8/06/15	Tandridge	Workshop attended to discuss their proposed methodology to their forthcoming Green Belt review. Comments were submitted to ensure that it was consistent with our GBCS.
28/4/15	Runnymede	Agree it is a strategic issue and any review of boundaries will need to consider neighbours
25/2/15	Waverley LAA consultation	Green Belt as a constraint to meeting housing need needs to be considered alongside the results of the recently published Green Belt review and the possibility of exercising exceptional circumstances.
28/7/15	Elmbridge GBBR	GBC proposed changes to the methodology where it was directly related to GBC and corrected facts in the narrative.
28/9/15	Elmbridge GB Review	Commentary on some of their scoring. Disagreed with 2 of the 3 'purpose' scores for local area 1 and the reasoning behind them, classification of East Horsley. Should there be mention of Wisley. Also need commentary over the gap between Cobham and East Horsley. Mentioned consistency of wording. Local Area 2 prevents Effingham Junction merging with Little Bookham

21/10/15	DtC Woking and Waverley	Adjustment to GB boundaries close to administrative boundaries needs to be agreed
17/05/16	Waverley	Informal view regarding Aaron's Hill site in relation to cross boundary Green Belt review
17/8/16	Runnymede I&O consultation	Agree that exceptional circumstances are likely to exist within Runnymede to facilitate amendments to GB boundaries.  Support decision to inset Thorpe Village from the GB
3/11/16	Spelthorne Green Belt Assessment methodology	Support the approach of the Green Belt review as a first step to enable Spelthorne to consider the relevant exceptional circumstances against the findings of this study in deciding the extent to which Green Belt will be required to meet development needs.  Comments on the interpretation of the Green Belt purposes in relation to its consistency with our GBCS.
10/03/17	Surrey Heath BC	Email to Surrey Heath regarding the impact of inseting Pirbright and Keogh Barracks from GB
09/10/17	Waverley	Response to Green Belt boundary amendment on Aaron's Hill site which straddles the Guildford and Waverley boundary, and remains within the GB in Guildford but has been excluded in Waverley. Recommendation that the green belt boundary be strengthened as part of any planning permission.

## Appendix 8: Audit trail of ongoing cooperation - Health

Date	Partners engaged <i>Meeting/email/ telephone conversation</i>	Cross boundary issues discussed and any outcomes <i>Outcomes reached that affect GBC and other bodies</i>
21/5/14	NHS England, Surrey and Sussex team (and Contract manager)	
2/9/14	<p>Royal Surrey County Hospital - Chair of Directors and Chief Executive.</p> <p>Also present were : GBC councillor and Governor of Royal County Hospital, and GBC's Public Health co-ordinator and Principal Policy Planner.</p>	<p>Discussed planning periods, parking and congestion, and staff housing concerns.</p> <p>Impact of the borough's draft planned housing.</p> <p>The Hospital, with the University of Surrey, is keen to have a medical school.</p>
12/9/14	Surrey County Council, and Planning Working Group	Presentation by SCC and discussions on The Care Act and new duties on local authorities with social care responsibilities to facilitate a vibrant, diverse and sustainable market for high quality care and support.
26/08/14	NHS representatives	<p>Overview of Local Plan and specific questions raised:</p> <ul style="list-style-type: none"> <li>• How does the Local Plan contribute to the delivery of the Public Health and CCG agenda and can it be improved to achieve more?</li> </ul>



		<ul style="list-style-type: none"> <li>• How are the CCG responding to the anticipated levels of growth (economic and housing) planned for the borough?</li> <li>• Do changes in the design of healthcare delivery have implications for long term planning?</li> <li>• How should Guildford work in cohesion with the three CCG's who provide for portions of Guildford and Waverley?</li> <li>• Are there planning implications as a result of patient choice of services located across a number of boroughs?</li> </ul>
January 2015	GBC, CCG, SCC	Finalised a Guildford Health and Wellbeing Strategy
28/8/15	NHS England	Discussed a current planning application, which may include a new GPs surgery, and also the draft new Local Plan, including its sites and locations.
24/9/15	SCC (public health), NHS	Pond Meadow Community Centre scheme has been welcomed by the Guildford Surrey Board and proposals for a design have been shared. Costing to be drawn up by SCC to identify any funding gap.
11/12/15	SCC, NHS	Pond Meadow Community Hub update- overview of costings and various income sources. There had been no progress on the drawings and site layout.
14/6/16	Rushmoor	Agreed there are currently no strategic issues
29/7/16	Guildford Surrey Board	The Board noted potential concerns with the former Pond Meadow site in terms of whether it would be large enough to accommodate health partner's needs. A second SCC owned site had been considered. It was agreed that a project team should be established to look at health, community and youth provision across the two sites.
08/09/16	NHS Guildford and Waverley Clinical Commissioning Group	Request for site planning inputs (carried out by service provider) as part of developing primary care estate in Guildford.
26/09/16	Pick Everard (service provide for NHS Guildford and Waverley Clinical Commissioning Group)	Inputs to site feasibilities as part of NHS Guildford & Waverley CCG's development plan - developing primary care estate in Guildford. Requested input on broader health care infrastructure planning.
17/05/17	Rushmoor	Duty to Cooperate meeting: Confirmed no outstanding Duty to Cooperate issues, but continue to remain engaged in ongoing discussions as respective Local Plans progress.

Guildford borough Topic Paper: Duty to Cooperate

25/10/17	North East Hampshire & Farnham CCG and Major Applications team	<p>Discussed:</p> <ul style="list-style-type: none"> <li>• Impacts of development in Ash and Tongham on practices that fall within the North East Hampshire &amp; Farnham CCG area</li> <li>• How contributions could be calculated and provision provided</li> <li>• Relationship with Surrey Heath CCG</li> <li>• GBC to consult them on applications over 50 homes</li> <li>• GBC to add them to the LP database for consultations</li> </ul>
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## Appendix 8: Audit trail of ongoing cooperation - Housing

Date	Partners engaged <i>Meeting/email/ telephone conversation</i>	Cross boundary issues discussed and any outcomes <i>Outcomes reached that affect GBC and other bodies</i>
<b>Housing need and supply</b>		
Feb 2014	Enterprise M3 LEP	Inputted to joint Surrey comments to the Housing evidence study, written by Regeneris.
24/03/14	Woking, Waverley and GL Hearn	West Surrey SHMA inception meeting
27/03/14	Woking and Waverley	MoU signed – commits LPAs to a review of whether to update the SHMA every three years and regular meetings
16/04/14	Surrey Heath, Woking, Runnymede, Spelthorne, Elmbridge, Epsom and Ewell, Mole Valley, Waverley, Rushmoor, Hart, East Hampshire, Chichester and Horsham	Emailed all LPAs to ask them to identify whether they may have spare capacity to meet any unmet housing need. None of the responses were positive, with a number saying insufficient detail was supplied.
16/06/14	Woking, Waverley and GL Hearn	Presentation of initial demographic work
4/08/14	Woking, Waverley, GL Hearn and Edge Analytics	Discuss review of initial GL Hearn report undertaken by Edge Analytics
30/10/14	Council Leaders of Guildford, Woking and Waverley	Agreement of demographic assumptions in order to be able to finalise SHMA. GL Hearn to be instructed to finalise West Surrey SHMA. Provisional publication date of 3 December agreed.

	Councils	
11/2014	Woking, Waverley and GL Hearn	Comments submitted by LPAs on draft report
12/2014	Woking, Waverley and GL Hearn	Comments submitted on revised final report
18/12/2014	Woking, Waverley and GL Hearn	Draft West Surrey SHMA published
15/01/2015	Surrey County Council contacts for Extra Care, Dementia, Residential and Nursing care	Draft West Surrey SHMA published – inviting any comments.
14/10/14	Response to Waverley potential housing scenarios	WBC new local plan would need to reflect the finding of joint SHMA. Consultation document does reflect the starting year as shown in the SHMA. Transport is based on 'April' scenarios rather than the 'September' scenarios as set out in the consultation document. Need to assess the likely worst case impact for transport and the A3 bypass. Lots of WBC residents travel to Guildford station by car to get the train to work Document does not stipulate if land will be safeguarded for future development Study identifies two sites that include land located within Guildford, which are not allocated in our DLP Should consider whether the inclusion of traveller sites at strategic sites could help ensure mixed communities. Current form of document does not have enough regard of the FEA it sits in
6/3/15	Waverley	As well as Dunsfold, Waverley now has more potential sites around villages that may be suitable for some development Guildford's main areas for growth are along the A3
27/3/15	Spelthorne	Response to DtC scoping statement: whilst Guildford do not form part of the Spelthorne's housing market area, housing need and provision is a sub-regional issue. Through our respective local plans it will be important that we all maximise opportunities to sustainably meet identified needs in order to minimise pressure on remaining areas.
4/6/15	Spelthorne and Runnymede	Responded to joint SHMA consultation and recognised linkages between some of our joint areas and theirs.

12/6/15	Kingston and NE Surrey	Responded to SHMA and supported sources of information and findings of analysis
15/6/15	Reigate and Banstead	Commented that our SHMA does not identify any particular linkages with R&B
28/4/15	Runnymede	Agree housing is strategic issue despite not being in our SHMA
25/2/15	Waverley LAA consultation	<p>Noted that it would not be necessary for GBC to attend all forums but will do so when necessary for cross boundary site issues.</p> <p>Disagreed with the fact that not producing a joint LAA was due to timescale but more of a practicality issue. Suggest a summary table at the front of all documents showing situation across whole HMA.</p> <p>Suggested checking whether landowners are happy for sites with pre-app to be included with a LAA.</p> <p>Suggested too early to omit sites due to being in FZ3 as a sequential test could allow development.</p> <p>Advised to look at planning history of sites to see if permissions have not been implemented.</p> <p>Any proposed housing yield should be clarified that these are informed by evidence</p> <p>Suggested that wording around large LAA sites suggests that the outcome of the LAA is already known.</p> <p>Not clearly demonstrated by the LAA or LP will be unable to identify land to meet the needs in the 11-15 year period.</p> <p>Methodology needs to expand a little further on other land uses- employment, community, G&amp;T</p>
17/7/15	Rushmoor LP consultation	<p>Note that preferred approach does not meet the full identified OAN. Would therefore expect to see attempts to meet full OAN across HMA</p> <p>Noted that an NPPG compliant LAA has not been completed.</p> <p>The SHLAA does not appear to work through the assessment review set out in the methodology.</p>
30/7/15	Woking Site Allocations DPD	<p>Pointed out that continuing with Core Strategy housing target is significantly below the draft West Surrey SHMA. The NPPF suggests Local Plans should meet OAN where possible and guidance on producing a SHMA has evolved. Stated that we thought their approach had sought to constrain housing supply to the level in the Core Strategy, rather than considering this as a minimum. Referred to a recent High Court decision that the strength of the Green Belt cannot preclude the existence of countervailing exceptional circumstances. The Green Belt review study was too restricted.</p> <p>Question rationale for not releasing GB land for development until 2022, given the extent of shortfall against OAN. Given that many of Guildford's sites will come forward in the latter part of our plan period, it would be beneficial for Woking to deliver homes in earlier stages to satisfy the HMA.</p> <p>Safeguarded sites assume a continuation of the current housing figure, so will create an even greater shortfall to the OAN.</p>

		<p>Windfall should be additional to the sites set out to meet 292.</p> <p>No explanation as to why it can be expected that future trends will continue on sites less than 6 homes.</p> <p>Concerns over deliverability when sites are in multiple land ownerships and do not meet NPPF test for developable sites.</p> <p>Proposing sites as housing and /or employment does not give a realistic indication of expected figures.</p> <p>Would be appropriate to use the draft West Surrey SHMA rather than relying on 2009 version, as it outlines specific specialist housing requirements.</p> <p>Would like some clarity on where the need for a strategic travelling showpeople site has come from. We would willingly cooperate though as we have constraints to meeting our traveller need.</p> <p>We would ask Woking to publish evidence of a Strategic Transport Assessment.</p>
18/08/15	Kingston and NE Surrey	Discussed housing market dynamics and trends with their SHMA consultants to inform their assessment.
4/6/15	West Surrey Local Plan group	<p>Discussion around whether there is a need to discount sites in a LAA due to potential that not all sites will come forward.</p> <p>Surrey Heath stated that a lack of sites is a constraint to meeting needs based on economic projections.</p>
23/9/15	West Surrey Local Plan group	<p>Woking expressed concern that DTC is not working effectively, for example when different consultants have different approaches- needs to be consistent</p> <p>SHMA Woking's CS had tested a higher figure of growth (1,500 homes) to meet more affordable need and a slightly reduced figure. The environmental constraints that exist are too great to be able to support those figures. A similar testing of higher figures had been undertaken at Surrey Heath.</p>
25/9/15	Guilford Surrey Board	Slyfield Development -The memorandum of understanding, which would form the basis of the relationship between Guildford Borough Council and Thames Water, would be signed in October 2015.
23/9/15	Surrey leaders group	<p>Leaders were supportive of the policy of increased home ownership but concerns over practice.</p> <p>Problems raised of replacing housing stock lost through right to buy and disposal of council homes and impact on homelessness. How to bridge the time lag between starting to build new homes and the receipt of disposal income.</p>

14/10/15	Runnymede and Spelthorne Joint SLAA Methodology	<p>Comments relating to instances where their methodology is different to ours. Did not include the nine sites identified in the Green Belt Review. Unclear why these sites should not inform the site analysis to identify a range of sites.</p> <p>Stated we would welcome further clarification on the under-delivery adjustment and how it sits alongside the NPPF requirement, particularly as examples used pre-date the NPPF. Should have sufficient flexibility should sites not be delivered as planned.</p>
21/10/15	Woking and Waverley	<p>Agreed it would be helpful to prepare a housing trajectory for the whole HMA to make clear how much housing was being delivered across the area as a whole to smooth out areas where the focus was on short term delivery versus the longer term delivery for the strategic sites</p> <p>It was agreed that each authority should consider the possibility of seeking an early review of the Local Plan where OAN were not likely to be met.</p> <p>Local Plans to make reference to joint working on housing, employment and gypsy and travellers and the agreed approach to meeting OAN identified in the SHMA. Where there are unresolved issues it should be made clear how these will be managed.</p> <p>Agreed that level of housing need and approach to meeting unmet housing need</p> <p>If a local authority cannot meet its objectively assessed need then it will include a reference in the Local plan of its willingness to seek an early review of the Local Plan</p>
12/1/16	Waverley and Woking	<p>Existing MOU does not currently explore what actions we would take if there was a shortfall in housing. There will be issues of unmet need across HMA, at the very least from Woking. This poses a risk to all examination processes. Agreed to demonstrate how we will continuously work in partnership in the future to address unmet needs in HMA.</p> <p>In the future would be useful to align local plan preparation.</p> <p>Dunsfold application submitted – includes proposals to mitigate transport impact through improvements at Shalford on GBC common land. As yet there has been no approach to GBC from Dunsfold applicants.</p>
5/4/16	Response to Runnymede local plan	<p>Acknowledge that our HMAs do share linkages, we do not consider ourselves in a position to help with realistically contributing to Runnymede's housing need. Unclear what work has been undertaken with Spelthorne to explore how housing delivery could be maximised across your HMA.</p>
13/4/16	Waverley, Woking and Guildford	<p>Have prepared, and all endorse, the Statement of Common Ground and agree future discussion around aligning evidence bases and methodology, the dates for reviewing Local Plans, measures in place to deliver housing and exploring the merits of aligning the 3 plan periods</p>
8/7/16	Planning Working	<p>Local Strategic Statement discussed, and progressing with those templates for sub areas. Further</p>

	Group	meetings organised with individual sub groups to identify spatial priorities to present back to Planning Working Group in September
20/7/16	West Surrey Local Plan Group	Contacted by email to understand their interpretation of the Housing and Planning Act and its implications for self-build registers (in regards to Duty to provide 'suitable development permission', eligibility criteria etc).
17/8/16	Runnymede I&O	It is important that Runnymede maximises all opportunities for meeting full objectively assessed needs as the abilities of its HMA to do the same are not yet known. Note that the higher growth options would involve the allocation of land that has not been identified through the Green Belt Review and which perform more strongly against Green Belt purposes. Once the full unmet needs within the HMA is understood further consideration would need to be given to the factors listed above as part of assessing whether exceptional circumstances exist that would justify a further amendment to the Green Belt boundary
27/9/16	Waverley and Woking	Discussed consultation responses received to the GBC Proposed Submission Local Plan in regards to the West Surrey SHMA. GBC have stated that we will revisit the assumptions underlying the SHMA and are considering the most appropriate way of doing this.
03/10/16	Response to Waverley Pre-submission Local Plan	Summary of representation: GBC welcome approach to meeting OAN but note that the Waverley Local Plan does not have any buffer (NPPF requires plans to be flexible to be able to adapt to rapid change). Without a buffer, the plan is at risk of being considered out-of-date if any of the housing supply were to fall away. GBC encourage Waverley to consider additional sites.  Encourage the inclusion of additional information regarding windfall sites. Encourage further exploration of whether historical trends will continue. Once an up-to-date Local Plan is in place and a LAA published, historical windfall rates are likely to fall.
3/10/16	Waverley and Woking councils (with senior officers)	Discuss finalisation of Statement of Common Ground regarding unmet need including exploring mechanisms to meet this need in relation to Woking's current plan making process
27/10/16	Waverley	Shared scope of West Surrey SHMA Guildford Addendum
28/10/16	Waverley and Woking	Finalise update to SoCG on unmet need in HMA
16/12/16	Runnymede	Correspondence to produce a SoCG to minimise ambiguity with outstanding issues.
26/01/17	Surrey Heath	Response to say that we are unable to meet their unmet needs. Suggest they should carry out a GB review



2/2/17	Surrey Heath	Responded to dtc scoping statement – noted linkages between HMAs
06/2/17	Woking	Responded to their targeted Reg 18 Site Allocations DPD regarding the safeguarded site at Martyrs Lane. Consider further evidence is required to demonstrate that this site and the other previously proposed to be safeguarded sites could not be brought forward earlier to meet unmet needs in HMA
07/03/17	Mole Valley	Responded to the DTC Scoping Statement consultation noting that no specific cooperation between the boroughs is needed at present.
21/02/17	Elmbridge	Joint West Surrey response to Strategic Options consultation regarding their inability to demonstrate meeting OAN
17/05/17	Rushmoor	Duty to Cooperate meeting: agreed no outstanding issues, but continue to remain engaged in ongoing discussion as respective Local Plans process.
7/06/17	Waverley and Woking	Meeting to discuss: <ul style="list-style-type: none"> <li>• Clarify why sites removed from GBC plan cannot meet unmet needs</li> <li>• Issues with early delivery / potential for HMA trajectory to show a more even distribution given Woking's over provision and Waverley's front loaded plan – agree to share housing trajectories for purposes of Waverley EIP and ongoing review</li> <li>• Statement of Common Ground</li> </ul>
7/06/17	Waverley and Woking - meeting	Discussed potential attendance at Waverley examination. Followed up by email with Guildford LAA Addendum.
09/10/17	Waverley	Response to Waverley consultation on 'main modifications to the pre-submission Local Plan part 1: strategic policies and sites'. Support the recommendation for Waverley to meet approximately half of Woking's need, but Guildford's emerging Local Plan evidence base suggests that we will not be able to meet the remaining need. This assumption will be tested through the examination process.
13/10/17	Waverley	Confirmation that they have no comments to make on the proposal for the Review of Housing Needs Evidence across West Surrey HMA
18/10/17	Waverley	Supplementary response to Waverley consultation on 'main modifications to the pre-submission Local Plan part 1: strategic policies and sites'. Cross boundary transport impacts.
20/10/17	Waverley and Woking - meeting	Meeting to discuss implications of Waverley examination and updating the SoCG for Guildford's submission. Action to share draft Review of Housing Needs Evidence across West Surrey HMA

31/10/17	Waverley and Woking	Shared draft Review of Housing Needs Evidence across West Surrey HMA
10/11/17 and 20/11/2017	Waverley	Comments from Waverley on draft Review of Housing Needs Evidence across West Surrey HMA and email to say they were satisfied with the final version
Nov 2017	Waverley and Woking	Numerous emails to update and agree SoCG to support Guildford's submission
<b>Later Life</b>		
16/12/15	Surrey County Council, Waverley Borough Council (Housing Dept)	Meeting to discuss later life housing and accommodation with care and support (C2 and C3 uses), demand and future need and the findings of the West Surrey Strategic Housing Market Assessment. NHS representative unable to attend. Surrey County Council to draft a paper on the types of later life accommodation needed, the tenure, broad locations and projected need. Guildford BC to send potential sites for C2 use to SCC for initial non-prejudicial feedback.
30/9/16	Surrey County Council	Guildford comments given on SCC draft document Accommodation with Care and Support Planning Input - Guildford Waverley CCG (Older People).
<b>Self Build</b>		
13/10/16	West Surrey Planners Group	Various matters discussed including approach towards self-build registers and self-declaration on forms that register criteria are met.
19/4/17	Waverley	Meeting to discuss Guildford Borough Councils approach toward Self and Custom Housebuilding register and local eligibility criteria.
<b>Sites</b>		
11/11/2014	Woking	Discussion of implications of Woking's emerging Delivery DPD which includes site allocations
13/11/2014	Waverley	Tour of Dunsfold as will be central to housing market area which included Woking
22/12/2014	Waverley	Commitment to meet in new year to discuss Dunsfold and transport impacts arising from both LPs
11/09/17	Waverley	Meeting with Aaron's Hill site promoters. Whilst site is being brought forward in Waverley's plan, it is not being proposed in Guildford's Submission Local Plan. Pre-app to begin. Guildford DM team to be involved.

## Appendix 8: Audit trail of ongoing cooperation - Retail

Date	Partners engaged <i>Meeting/email/ telephone conversation</i>	Cross boundary issues discussed and any outcomes <i>Outcomes reached that affect GBC and other bodies</i>
8/12/14	Hart- email	Responded to Hart to say that a small part of Hart is identified in our emerging retail study as an area from which there is a small amount of expenditure leakage to Guildford, although not significant.
11/6/15	Elmbridge email	Responded to email regarding joint retail assessment saying that we are in the process of completing our own study so a joint one is not appropriate at this time
28/4/15	Reigate and Banstead	Our catchment area does not include Reigate and Banstead, so not a strategic issue
17/7/15	Rushmoor Local Plan Consultation	Noted that our upcoming retail and leisure needs study shows considerable convenience expenditure from Ash and Tongham into Aldershot so we are likely to plan for a large supermarket to claw back some of this leakage.
17/8/16	Runnymede I&O	<p>Whilst leisure uses are a key theme of the recreation, green space and leisure chapter, the approach to main town centre uses outlined within national planning policy has not been recognised. This is considered to be an important omission given that the alternative approaches identified for leisure uses include “RGL6/01- Rely on existing policies in the NPPF”.</p> <p>Would be helpful to summarise the provision of the NPPF and NPPG in terms of the main town centre uses within the ‘national policy’ section of the chapter.</p> <p>Whilst the council has stated its preference to set its own local planning policies, it should also be satisfied that it has sufficient evidence to suggest that there is not a need to allocate land for main TC uses.</p>
07/03/17	Mole Valley	Responded to DTC scoping statement – acknowledge that there are no competing centres, but there may be cross boundary implications. The Retail and Leisure Study update (2015) addendum will take account of the latest projections.

## Appendix 8: Audit trail of ongoing cooperation - SANG

Date	Partners engaged <i>Meeting/email/ telephone conversation</i>	Cross boundary issues discussed and any outcomes <i>Outcomes reached that affect GBC and other bodies</i>
08/10/14	Email	Discussion on the potential of a cross boundary SANG at Tongham Pools with Rushmoor. Rushmoor provided background information for the site.
21/11/14	Email	Made contact with officer at Surrey in order to progress delivery of Tongham Pools SANG and establish details of the proposal for transfer of ownership
26/11/14 to 17/12/14	Email	Discussion with Natural England over delivery of Tongham Pools SANG and use of differential tariff. NE to liaise with GBC, Surrey and Rushmoor. NE advise differential tariff acceptable subject to viability.
07/02/15	Email/Phone call	Suggested a cross boundary SANG at Snakey Lane. Discussed possibility with Surrey Heath and Rushmoor. Surrey Heath advise probably not needed. However, Rushmoor are already pursuing a SANG in the same area and were interested in pooling land. Rushmoor to lead. Provided maps and background information to help inform investigation.
15/01/15	Email	Investigated land assembly options with Thames Water. TW advise that their land is not available. Therefore, Snakey Lane is isolated from potential SANG in Rushmoor/Surrey Heath. Project closed.
20/02/15	Email	Investigated possibility of sharing a SANG at Send with Woking (excess capacity) and assembling a cross boundary SANG by extending Burpham Court Farm into Woking. Woking advised unlikely to need SANG capacity at Send and are not proposing a SANG on the border with BCF.
20/5/15	Meeting with Rushmoor	Agreed ongoing joint work to identify potential SANG capacity
17/7/15	Rushmoor Local Plan Consultation	The plan does not present enough SANG mitigation to deliver proposals and that delivery of housing is subject to SANG availability. Any further shortfall in housing would lead to an even larger level of unmet need in the area. This may increase housing pressure on neighbouring HMAs which GBC fall part of. We will continue to work proactively with Rushmoor Borough Council to deliver solutions for the shortage of SANG.
28/08/15	Meeting with	Discussion of potential SANG crossing Waverley and Guildford borough boundaries, in Tongham. Being

	Waverley Borough Council DC planning officers	promoted by a private developer to support a planning application for residential development. Outcomes – further dialogue between GBC DC officer and Waverley DC officer as to who would be the lead determining authority (likely to be Waverley), and for GBC to see if would acquire the SANG. Waverley’s position is that they wouldn’t. Further work to see how the SANG would fit into Waverley LP and GBC LP work.
21/10/15	DtC Woking and Waverley	Agreed that Waverley and Guildford share SANG sites
12/07/16	Meeting with NE at Tyting Farm	Met with NE and Parks at Tyting Farm to go over proposals for the site. Outcomes – broad approval for proposals. Discussion of how much SANG NE want to see nailed down at examination. Big issue given delivery times and current uncertainty over development proposals. NE will respond in writing.
17/8/16	Runnymede I&O	As starter homes will likely fall within the proposed amended NPPF policy definition of “affordable housing” they will be exempt from CIL. However, SAMM is not classed as “infrastructure” and so is not subject to the S106 pooling limitation of 5 or more planning obligations introduced by the CIL regulations (reg 122). The starter homes exception sites Ministerial Statement and Guidance says that “LPAs should not seek S106 affordable housing, nor any tariff-based contributions to general infrastructure pots from starter homes, but will still be able to seek other S106 contributions to mitigate the impact of development to make it acceptable in planning terms.” It may therefore be possible to continue to secure payments to SAMM from starter homes by S106.

## Appendix 8: Audit trail of ongoing cooperation – Services and Utilities

Date	Partners engaged <i>Meeting/email/ telephone conversation</i>	Cross boundary issues discussed and any outcomes <i>Outcomes reached that affect GBC and other bodies</i>
12/12/14	Anne Milton (MP), GBC, SCC, Thames Water	The way forward for SARP, development opportunities Relocation of Slyfield Sewage Treatment Works- current operational issues Transfer of Thames Water Land at Clay Lane Link Road Planned works for Guildford High Street- relaying new setts
6/03/15	Waverley	A report on resilience prepared for Waverley raised issue of adequacy of electricity supplies
25/03/15	Enterprise M3 Board Meeting	Agree that expenditure from the Local Growth Fund (LGF) of £1.75m is approved for phase 1 of the Enterprise M3 5G Project. The 5G network can be used by companies in the Enterprise M3 Area and Greater Thames Valley.
27/03/15	Guildford Surrey Board	MOU to be signed between Guildford and Thames Water regarding Slyfield
27/01/15	UK Power Networks	Request to learn more about power distribution and potential exacerbated supply issues due to development proposed in Local Plan
9/11/15	Guildford and Surrey Councillors, LEP, Highways England, SCC officers	Site visit organised to show members the University library, 5G centre, Surrey Sports Park, Veterinary School, Surrey Research Park, RSCH
06/09/16	EA, GBC	(See also DTC records in relation to flooding). Discussion of EA's consultation response to Proposed Submission Local Plan (2016). This resulted in commissioning and production of Water Quality Assessment (WQA) providing the evidence to demonstrate impacts of growth identified in the Local Plan on achieving Water Framework Directive (WFD) good environmental status objectives / cause deterioration and Waste Water Treatment Work capacity. EA committed to work with GBC to ensure the WQA is robust, offering comments at appropriate stages.
17/10/16	UK Power Networks (incl. University of	Guildford currently served by a double circuit overhead line predominantly down the A3 corridor and is close to capacity. Future growth would be the trigger for a third circuit, potentially coming in from

	Surrey, Royal Surrey County Hospital)	Effingham to the east of the town. UKPN needs to have a degree of certainty about proposed new growth and associated power demands before investing in new cable. The current Electrical Distribution (ED) regulation period ends in 2023 and that UKPN has reasonably firm plans in place up to then.
24/07/17	UK Power Networks (incl. University of Surrey, Royal Surrey County Hospital)	UKPN provided with update on Local Plan process including proposed changes to site allocations. Noting of major development applications that potentially have power impact. UKPN are currently developing an updated Regional Development Plan (RDP) for next control period (5 years).
26/10/17	UK Power Networks (incl. University of Surrey, Royal Surrey County Hospital)	UKPN progressing on developing the updated Regional Development Plan (RDP) for next control period (5 years). RSCH and UoS estimates of need will feed into RDP.

## Appendix 8: Audit trail of ongoing cooperation - SPA

Date	Partners engaged <i>Meeting/email/ telephone conversation</i>	Cross boundary issues discussed and any outcomes <i>Outcomes reached that affect GBC and other bodies</i>
Ongoing Regular officer meetings and less frequent member's meetings.	Joint Strategic Partnership Board (JSPB) comprised of 11 SPA affected local authorities and attended by Natural England and other environmental bodies.	Discussion and monitoring of the implementation of the strategic approach to protecting the SPA through the provision of SANG and SAMM as set out in policy NRM6 of the South East Plan.
28/4/15	Runnymede	Agree SPA is a strategic issue
14/6/16	Rushmoor	Agreed to continue to engage and cooperate regarding SANG provision
Sep/Oct 2016	11 SPA Affected authorities, Natural England, other statutory stakeholders	Formal four week consultation on a new Thames Basin Heaths Special Protection Area Avoidance Strategy 2017 SPD. Following the consultation telephone calls were made to Bracknell Forest Council to clarify some of the points that were raised. Further engagement also happened with Natural England to clarify points raised, and to seek endorsement on the final post consultation version of the document. The consultation and following engagement resulted in positive changes to the strategy. The strategy implements the strategic approach agreed by the 11 SPA affected authorities and Natural England.
2/2/17	Surrey Heath	Responded to DTC scoping statement – agreed SPA cross boundary issue
17/05/17	Rushmoor	Duty to Cooperate meeting: Confirmed no outstanding Duty to Cooperate issues, but continue to remain engaged in ongoing discussions as respective Local Plans progress.



## Appendix 8: Audit trail of ongoing cooperation - Transport

Date	Partners engaged <i>Meeting/email/telephone conversation</i>	Cross boundary issues discussed and any outcomes <i>Outcomes reached that affect GBC and other bodies</i>
23/10/2012	Meeting  Guildford Transport Modelling Meeting  Surrey CC / Highways Agency / Guildford BC	<ul style="list-style-type: none"> <li>• Guildford BC proposing to undertake a Regulation 18 Issues &amp; Options consultation and subsequent stages of Local Plan-making process.</li> <li>• Potential spatial strategy.</li> <li>• Ongoing strategic highway assessment work including cross boundary impacts and its study programme.</li> <li>• Process for identifying potential mitigation schemes.</li> <li>• Potential to initiate a potential Guildford Town Transport Study 2012.</li> <li>• Potential Highways Agency study to identify future A3 Guildford link and junction improvements.</li> <li>• Surrey CC's position as to whether or not to continue to require the safeguarding of an alternative road link from Walnut Tree Close to Guildford railway as per policy M7 of Local Plan 2003 in a new Local Plan.</li> </ul>
25/10/2012	Email  Surrey CC to Guildford BC	Confirmation of Surrey CC's position that the safeguarding of an alternative road link from Walnut Tree Close to Guildford railway as per policy M7 of Local Plan 2003 is not required in a new Local Plan.
9/11/2012	Meeting  Transport planning projects for Guildford borough  Guildford BC / Surrey CC	<ul style="list-style-type: none"> <li>• Scheme development work on potential Guildford gyratory scheme, and assessment requirements with respect to a new Local Plan</li> <li>• Potential bid for a Guildford gyratory scheme to the new Local Transport Body or Growing Places fund.</li> <li>• Guildford BC to prepare a project brief for a Guildford town centre and its approaches movement study.</li> <li>• Will seek advice from Highways Agency as to whether its present/forthcoming study work is considering A3 Guildford strategic options in addition to 'pinch point' options.</li> </ul>

12/11/2012	<p>Workshop</p> <p>Guildford Together Event</p> <p>Guildford Local Committee councillors from Surrey CC and Guildford BC / Surrey CC / Guildford BC / representatives of local communities</p>	<ul style="list-style-type: none"> <li>• Workshop event identified strategic priorities, and for each immediate priority and long-term priority. The strategic priorities identified were traffic congestion, transportation, housing/planning, cleanliness, service provision [schools] and culture/identify.</li> </ul>
21/11/2012	<p>Meeting</p> <p>Surrey CC / Guildford BC councillor-level meeting on transport and spatial planning portfolios</p> <p>Surrey CC / Guildford BC</p>	<ul style="list-style-type: none"> <li>• Ongoing strategic highway assessment work and its study programme.</li> <li>• Meeting to be arranged with Highways Agency to consider scope of their study work.</li> <li>• Surrey CC to be kept involved in the forthcoming Guildford BC-commissioned Guildford town centre and its approaches movement study.</li> <li>• Scheme development work on potential Guildford gyratory scheme, and assessment of options with respect to pedestrian provision and permeability.</li> <li>• Further discussion about Guildford BC's role in influencing Guildford Local Committee's allocation of funding to projects.</li> <li>• Replacement for Guildford bus station.</li> <li>• Local Sustainable Transport Fund Surrey TravelSMART programme in Guildford.</li> <li>• Surrey CC has commissioned Arup to undertake a Rail Strategy study.</li> <li>• Surrey CC is undertaking a Congestion Programme study.</li> </ul>
22/11/2012	<p>Telephone conversation</p> <p>Guildford BC / Highways Agency</p>	<ul style="list-style-type: none"> <li>• Highways Agency advised Guildford BC that the proposed Highways Agency study work in 2013/14-2014/15 will be limited to developing a strategy to deliver, and design, a series of £10m or less 'pinch point'-type junction and link improvements on the line of the existing A3 corridor. The Highways Agency will not be initiating study work to consider the potential for A3 Guildford strategic options.</li> </ul>

13/12/2012	Meeting  Guildford borough transportation issues  Guildford BC / Surrey CC / Highways Agency	<ul style="list-style-type: none"> <li>• Scheme development work on potential Guildford gyratory scheme.</li> <li>• Surrey CC councillor chairman of Guildford Local Committee and a senior Surrey CC officer to sit on the steering group for forthcoming Guildford BC-commissioned Guildford town centre and its approaches movement study.</li> <li>• Ongoing strategic highway assessment work and its study programme.</li> <li>• Meeting to be arranged with Highways Agency to consider scope of their study work on 'pinch points'. Also to consider the potential for a Guildford BC/Surrey CC study to consider A3 Guildford strategic options.</li> <li>• Potential for Guildford BC/Surrey CC future joint working to deliver Environmental Projects as part of Surrey CC highway maintenance and transport improvement schemes.</li> <li>• Potential for new rail halts or stations to serve potential urban extensions of Guildford urban area. Guildford BC providing evidence to Surrey CC's Rail Strategy study and sits on project's borough and district council stakeholder group.</li> </ul>
13-14/12/2012	Email  Surrey CC	Draft project brief for Guildford town centre and approaches movement study was circulated to Surrey CC for comment.
28/12/2012 and 2/1/2013	Email  Surrey CC	Comments received from Surrey CC on draft project brief for Guildford town centre and approaches movement study.
19/12/2012	Workshop  Guildford town centre: public realm improvements  Surrey CC / Guildford BC	<ul style="list-style-type: none"> <li>• Draft objectives for scheme development.</li> <li>• Potential high level options for changes to the gyratory were considered and short listed.</li> <li>• Wayfinding project is to be completed for the town centre.</li> </ul>

11/1/2013	<p>Meeting</p> <p>A3 and A31 meeting</p> <p>Guildford BC / Highways Agency / Surrey CC / University of Surrey</p>	<ul style="list-style-type: none"> <li>• Highways Agency will not be putting forward A3/A320 scheme for third phase of 'pinch point programme'. Highways Agency suggested consideration given to wider scheme, also involving improvements to A320.</li> <li>• Potential Highways Agency study on strategy for on-line improvement schemes for A3 through Guildford, between A3/A31 junction to the A3100 Burpham Interchange junction, to develop 'pinch point' types schemes for future delivery.</li> <li>• Potential Guildford BC study on wider economic impact study of long term strategy options for A3 through Guildford.</li> <li>• Blackwell Farm site and potential access via new junction to A31.</li> <li>• Potential new rail station at Park Barn being considered in Surrey CC's Surrey Rail Strategy study.</li> </ul>
11/1/2013	<p>Meeting</p> <p>Surrey TravelSMART – Guildford package – Travel planning and walking/cycling improvements</p> <p>Surrey CC / Guildford BC</p>	<ul style="list-style-type: none"> <li>• Progress with delivery of North Street environmental improvement phases 1 (complete) and 2 for North Street and relationship to potential redevelopment of North Street site.</li> <li>• Scheme development work on potential Guildford gyratory scheme and potential bid to the new Local Transport Body.</li> <li>• Major planning applications and pre-application discussions in Guildford town centre.</li> <li>• Wayfinding study.</li> <li>• Improving provision of cycle parking in Guildford town centre.</li> </ul>
22/1/2013	<p>Meeting</p> <p>Transport for Guildford Steering Group</p> <p>Guildford BC / Surrey CC / Highways Agency / South West Trains / Arriva / Safeguard Coaches / Walking and Cycle Forum / other third parties</p>	<ul style="list-style-type: none"> <li>• Update on performance of new implemented schemes at new hospital junction and North Street environmental improvement phase 1.</li> <li>• Update on delivery of committed Local Sustainable Transport Fund – Guildford Package, including Onslow Park and Ride scheme, improvements to bus priority and corridors, walking and cycling routes and wayfinding project, and information, travel planning and marketing.</li> <li>• Update on schemes in development for Guildford gyratory, North Street environmental improvement phase 2, relocation of bus station facilities, and A3/A320 scheme.</li> <li>• Updates on strategies studies: Guildford BC-led Guildford town centre and approaches movement study, Guildford BC-led Wider economic impact study of strategic alternative options for Guildford A3 corridor, and Highways Agency's potential study on strategy for on-line improvement schemes for A3 through Guildford.</li> <li>• Parking and traffic congestion issues in Westborough.</li> <li>• Major planning applications and pre-application discussions in Guildford town centre.</li> <li>• Brompton Dock bike hire scheme.</li> </ul>

<p>Various dates including 23/1/2013, 13/2/2013, 21/3/2013, 24/4/2013, 10/7/2013, 13/5/2014, 21/7/2014, 18/8/2017, 20/10/2014, 30/1/2015, 23/2/2015 and 23/3/2015</p>	<p>Meetings</p> <p>Guildford gyratory project board/ From 2015 was Wider Guildford Sustainable Transport Package/Sustainable Transport Package</p> <p>Surrey CC / Guildford BC</p>	<ul style="list-style-type: none"> <li>• Review of progress with scheme development work on potential Guildford gyratory scheme, including with respect to design, traffic modelling, appraisal and public engagement, project programme and risk register.</li> <li>• Also considered initial proposals for replacement of Walnut Bridge, closure of Walnut Tree Close to through traffic, and sections of the Sustainable Movement Corridor, radial corridors for cycle and bus improvements.</li> <li>• Surrey CC submitted mini-business case to Local Transport Body in summer 2013.</li> </ul>
<p>23/4/2013</p>	<p>Meeting</p> <p>A3 and A31 meeting</p> <p>Guildford BC / Highways Agency / Surrey CC / University of Surrey</p>	<ul style="list-style-type: none"> <li>• Discussion of the transport issues on the A3 Guildford and A31 Hog's Back and potential schemes to address issues.</li> </ul>
<p>15/5/2013</p>	<p>Meeting</p> <p>Transport for Guildford Steering Group</p> <p>Guildford BC / Surrey CC / Highways Agency / Arriva / Safeguard Coaches / Walking and Cycle Forum / other third parties</p>	<ul style="list-style-type: none"> <li>• Presentation and discussion on wayfinding project.</li> <li>• Update on delivery of committed Local Sustainable Transport Fund – Guildford Package, including Onslow Park and Ride scheme, improvements to bus priority and corridors, walking and cycling routes and wayfinding project, and information, travel planning and marketing.</li> <li>• Update on schemes in development for Guildford gyratory, North Street environmental improvement phase 2 and relocation of bus station facilities.</li> <li>• Updates on strategies studies: <ul style="list-style-type: none"> <li>○ Highways Agency's potential study on strategy for on-line improvement schemes for A3 through Guildford is at an early stage.</li> <li>○ Highways Agency is also at early stage with preparation of route based strategies, including for A3 and M3 and South coast to Midlands.</li> </ul> </li> </ul>

		<ul style="list-style-type: none"> <li>○ Draft of Surrey CC's Surrey Rail Strategy is being consulted upon.</li> <li>○ Details of the scope of, and procurement of, Guildford BC's Guildford Town and Approaches Movement Study (GTAMS).</li> <li>● Parking and traffic congestion issues in Westborough.</li> <li>● Major planning applications and pre-application discussions in Guildford town centre.</li> </ul>
19/7/2013	<p>Meeting</p> <p>Guildford Town and Approaches Movement Study – Inception meeting</p> <p>Guildford BC / Surrey CC / consultant</p>	<ul style="list-style-type: none"> <li>● Discussion of approach and methodology, data sources and study programme.</li> </ul>
11/9/2013	<p>Meeting</p> <p>Guildford Town and Approaches Movement Study – Steering Group Meeting</p> <p>Guildford BC / Surrey CC / Highways Agency / consultant</p>	<ul style="list-style-type: none"> <li>● Steering group meeting to consider project planning and Vision, Baseline &amp; Business-as-Usual stage.</li> </ul>
16/9/2013	<p>Workshop</p> <p>Guildford Transport Futures Workshop (Guildford Town and Approaches Movement Study)</p>	<ul style="list-style-type: none"> <li>● Workshop to gain stakeholder input to inform the development of the vision and objectives for the strategy.</li> </ul>

	<p>Guildford BC / Surrey CC / Network Rail / First Great Western / Safeguard Coaches / Arriva Southern Counties / Taxi advisory group / Burpham Neighbourhood Forum / other third parties</p>	
7/10/2013	<p>Workshop</p> <p>Highways Agency Route Based Strategies workshop</p> <p>Highways Agency / Surrey CC / Guildford BC / other third parties</p>	<ul style="list-style-type: none"> <li>Workshop to help establish Highways Agency's priorities for future investment in the operation, maintenance and enhancement of the Strategic Road Network, to inform the preparation of the first Route Based Strategies.</li> </ul>
9/10/2013	<p>Meeting</p> <p>Guildford Town and Approaches Movement Study – Steering Group Meeting</p> <p>Guildford BC / Surrey CC / Highways Agency / consultant</p>	<ul style="list-style-type: none"> <li>Steering group meeting to review progress of project with focus on Scenario Analysis stage.</li> </ul>
27/11/2013	<p>Meeting</p>	<ul style="list-style-type: none"> <li>Development of a transport evidence base by Hampshire CC and Surrey CC to inform investment decisions in</li> </ul>

	<p>Transport Action Group of the Enterprise M3 Local Enterprise Partnership</p> <p>Enterprise M3 Local Enterprise Partnership / Hampshire CC / Surrey CC / Highways Agency / Guildford BC representing Surrey districts / Rushmoor BC representing Hampshire districts / Department for Transport / Network Rail / South West Trains / Stagecoach Bus / other parties</p>	<p>the Enterprise M3 Local Enterprise Partnership area.</p> <ul style="list-style-type: none"> <li>• Transport input to the preparation of the Enterprise M3 Strategic Economic Plan.</li> <li>• Progress with the prioritisation of major schemes for investment.</li> <li>• Highways Agency's committed scheme for the M3 J2-4A managed motorway is due to enter construction in May 2014.</li> <li>• Network Rail's preparation of a Wessex Route Study will commence in December 2013.</li> </ul>
28/11/2013	<p>Meeting</p> <p>Guildford Town and Approaches Movement Study – Steering Group Meeting</p> <p>Guildford BC / Surrey CC / Highways Agency / consultant</p>	<ul style="list-style-type: none"> <li>• Steering group meeting to review progress of project with focus on Appraisal of Interventions stage.</li> </ul>
16/1/2014	<p>Meeting</p>	<ul style="list-style-type: none"> <li>• Steering group meeting to review progress of project with focus on Strategy and Recommendations stage.</li> </ul>



	<p>Guildford Town and Approaches Movement Study – Steering Group Meeting</p> <p>Guildford BC / Surrey CC / Highways Agency / consultant</p>	
31/1/2014	<p>Workshop</p> <p>Guildford Town and Approaches Movement Study</p> <p>Guildford BC / Surrey CC / Waverley BC / Highways Agency / Network Rail / Network Rail and South West Trains Alliance / Safeguard Coaches / Arriva Southern Counties / Burpham Neighbourhood Forum / other third parties</p>	<ul style="list-style-type: none"> <li>Workshop to explain the approach and emerging findings of the study and to seek stakeholder input to shape the final study recommendations and quick wins.</li> </ul>
21/2/2014	<p>Meeting</p> <p>Strategic transport investment in the Guildford Woking economic region</p>	<p>Meeting to discuss the potential to, and approach by which the parties could, jointly promote to Government the case for improvements in strategic transport infrastructure that are beyond the remit and capability of local partners to fund and deliver alone, including major investment in the A3 and in the North Downs railway line.</p>

	Surrey CC / Guildford BC / Woking BC / Enterprise M3 Local Enterprise Partnership / Network Rail / Highways Agency / Department for Transport / other third parties	
28/3/2014	Meeting  Guildford-Surrey Board  Surrey CC / Guildford BC	The emerging findings of the GTAMS study and its draft action plan were presented to the board and their comments and endorsement to proceed to publish the Strategy Report was sought.
23/4/2014	Meeting  Preparing Draft Infrastructure Delivery Plan to support Guildford borough's Draft Local Plan  Guildford BC / Surrey CC	<ul style="list-style-type: none"> <li>• Timing of committee process and consultation on Regulation 18 Local Plan (2014).</li> <li>• Draft policy [S2] on spatial strategy and Surrey CC officer suggested amendments.</li> <li>• Draft policy [ID3] on sustainable transport for new developments.</li> <li>• Draft Local Plan impacts on LRN and SRN if unmitigated based on Options Growth Scenarios Transport Assessment Report (Surrey CC, January 2014) (hereafter OGSTAR).</li> <li>• Approach to identifying key transport schemes required to support draft Local plan.</li> <li>• Process for updating Surrey CC's draft Guildford borough Transport Strategy and Improvement Programme document.</li> <li>• Surrey CC officers to consider and provide informal comments if desired on draft Infrastructure Schedule [Post meeting note: Comments received from Surrey CC officers.]</li> <li>• Surrey CC and Guildford BC agreed to hold an infrastructure schedule workshop.</li> </ul>
28/4/2014	Meeting  Preparing Draft Infrastructure Delivery Plan to support	<ul style="list-style-type: none"> <li>• Timing of committee process and consultation on Regulation 18 Local Plan (2014).Draft policy [S2] on spatial strategy.</li> <li>• Draft policy [ID3] on sustainable transport for new developments.</li> <li>• Draft Local Plan impacts on SRN and LRN if unmitigated based on OGSTAR.</li> <li>• Approach to identifying key transport schemes required to support draft Local Plan.</li> </ul>

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	<p>Guildford borough's Draft Local Plan</p> <p>Guildford BC / Highways Agency</p>	<ul style="list-style-type: none"> <li>• Guildford BC tabled draft of Infrastructure Schedule.</li> <li>• Discussion about Highways Agency's response to Issues and Options consultation (2013).</li> <li>• Transport interventions identified by respondents to Issues and Options consultation.</li> <li>• Highways Agency asked Guildford BC to remove 'Guildford A3 Strategic Corridor Improvements' scheme from draft Infrastructure Schedule as there is no certainty regarding the delivery of this Surrey CC-proposed scheme.</li> </ul>
19/5/2014	<p>Meeting</p> <p>Proposed Merrow Station – Workshop with Network Rail</p> <p>Martin Grant Homes / Network Rail / Surrey CC / Guildford BC</p>	<ul style="list-style-type: none"> <li>• Discussion of the work completed to date on the scheme development of a new railway station at Merrow.</li> </ul>
13/6/2014	<p>Meeting</p> <p>Gosden Hill, Guildford</p> <p>Guildford BC / Highways Agency / Surrey CC / Martin Grant Homes</p>	<ul style="list-style-type: none"> <li>• Guildford BC gave update on OGSTAR and GTAMS.</li> <li>• Highways Agency is developing a Paramics model for one or more sections of the A3 through Guildford for its A3 study.</li> <li>• Stakeholder responses from stage 1 of the Route Based Strategy are being reviewed.</li> <li>• Discussion of potential for, and necessity or otherwise of, various options for new or improved A3 junctions to the north-east of Guildford.</li> </ul>
1/7/2014	<p>Meeting</p> <p>Guildford borough Draft Local Plan – Duty to Cooperate Highways and transport liaison meeting</p> <p>Guildford BC / Surrey</p>	<ul style="list-style-type: none"> <li>• Status of Regulation 18 Local Plan (2014) and next stages in Local Plan making process.</li> <li>• Review of draft Infrastructure Schedule in Regulation 18 Local Plan (2014) item by item.</li> <li>• Update on forthcoming Local Plan study work.</li> <li>• Surrey CC's Transport Studies Team is preparing an addendum to the OGSTAR to provide an assessment of 'cross boundary impacts'.</li> <li>• Highways Agency requested that Guildford BC, in conjunction with Surrey CC as appropriate, should: <ul style="list-style-type: none"> <li>○ undertake more detailed junction modelling to allow the Highways Agency to understand the cumulative impact of Local Plan development on the queuing of traffic at A3 junctions and 'blocking back' on to the main carriageway of the A3 trunk road; and</li> <li>○ also potentially develop and assess potential mitigation proposals for the A3 trunk road.</li> </ul> </li> </ul>

	CC / Highways Agency	<ul style="list-style-type: none"> <li>• Highways Agency stated that it would not prepare a specification for the more detailed junction modelling that it had requested. Rather, Highways Agency could provide comments on any specification that Guildford BC/Surrey CC provided.</li> <li>• Highways Agency could not undertake the further transport planning analyses that it was requesting.</li> <li>• Highways Agency's Paramics model for one or more sections of the A3 through Guildford, which is under development, will not be ready for use by third parties including Guildford BC or Surrey CC in the period to the end of 2014.</li> </ul>
14/7/2014	Email Highways Agency to Guildford BC	<ul style="list-style-type: none"> <li>• Provided the Brighton &amp; Hove City Plan Strategic Transport Assessment (JMP, May 2013) as an example of strategic transport assessment which includes junction modelling.</li> <li>• Raised an additional new issue for Guildford BC / Surrey CC to undertake analysis to understand the cumulative impact of Local Plan development on peak spreading on the A3.</li> </ul>
23/7/2014	Meeting Enterprise M3 LEP projects and other transport planning for Guildford borough Guildford BC / Surrey CC	<ul style="list-style-type: none"> <li>• Discussion regarding the identification of schemes and progression of scheme development with respect to the provisional funding allocations for transport schemes in Guildford made by Government to the Enterprise M3 LEP through the Local Growth Fund.</li> <li>• Guildford gyratory scheme has evolved to be a town centre scheme.</li> <li>• Discussion about addressing Highways Agency's new issues for study work.</li> <li>• Discussion regarding the proposed finalisation by Surrey CC of the Guildford borough Transport Strategy &amp; Forward Programme following the adoption by Guildford BC of a new Local Plan.</li> </ul>
25/7/2014	Meeting Guildford-Surrey Board Surrey CC / Guildford BC	<ul style="list-style-type: none"> <li>• Transport modelling and modelling activities undertaken and ongoing to support the preparation of a new Local Plan.</li> <li>• Surrey CC and Guildford BC officers to meet with the Highways Agency to address Highways Agency's new issues for study work.</li> </ul>
12/8/2014	Meeting Highways and transport infrastructure planning for the emerging Guildford	<ul style="list-style-type: none"> <li>• Potential study approach to Highways Agency's new requests at 1/7/2014 meeting that Guildford BC, in conjunction with Surrey CC as appropriate, should: <ul style="list-style-type: none"> <li>○ undertake more detailed junction modelling to allow the Highways Agency to understand the cumulative impact of Local Plan development on the queuing of traffic at A3 junctions and 'blocking back' on to the main carriageway of the A3 trunk road; and</li> <li>○ also potentially develop and assess potential mitigation proposals for the A3 trunk road.</li> </ul> </li> </ul>

	<p>borough Local Plan Strategy and Sites</p> <p>Guildford BC / Surrey CC / Highways Agency</p>	<ul style="list-style-type: none"> <li>• Potential study approach to Highways Agency's additional request in email of 14/7/2014 for Guildford BC/Surrey CC to undertake analysis to understand the cumulative impact of Local Plan development on peak spreading on the A3.</li> <li>• Update on development of Highways Agency's Paramics model for A3 through Guildford, including options being assessed by Highways Agency for improvement of A3 Guildford.</li> <li>• Update on development of Surrey CC's SINTRAM strategic highway model.</li> <li>• Guildford BC and Surrey CC to consider study approach to address Highways Agency's three requests and coordinate with Highways Agency.</li> </ul>
28/8/2014	<p>Meeting</p> <p>Guildford borough Draft Local Plan Strategy and Sites Duty to Cooperate Highways and transport liaison meeting</p> <p>Guildford BC / Mole Valley DC / Rushmoor BC / Surrey Heath BC / Hampshire CC / Highways Agency / Surrey CC</p>	<ul style="list-style-type: none"> <li>• Status of Regulation 18 Local Plan (2014) and next stages in Local Plan making process.</li> <li>• Overview of study work on cross boundary highways and transport and Strategic Road Network.</li> <li>• OGSTAR addendum on cross boundary impacts.</li> <li>• Comments on draft Infrastructure Schedule.</li> </ul>
1-2/10/2014	<p>Meeting</p> <p>Guildford Infrastructure Delivery Plan Transport Workshops</p> <p>Guildford BC / Surrey CC</p>	<ul style="list-style-type: none"> <li>• OGSTAR and the identification of 'hotspots'.</li> <li>• Review of draft Infrastructure Schedule in Regulation 18 Local Plan (2014) item by item.</li> <li>• Various actions agreed with respect to updating the Infrastructure Schedule and further consideration of schemes.</li> </ul>

8/10/2014	<p>Meeting</p> <p>Guildford Joint Transport Planning &amp; Infrastructure Officer Group (Joint Infrastructure Group)</p> <p>Guildford BC / Surrey CC / Highways Agency</p>	<ul style="list-style-type: none"> <li>• Economic case and scheme options for a transformational investment in the A3 trunk road in Guildford borough.</li> <li>• A3 Guildford impact assessment study of draft Local Plan to respond to issues raised by Highways Agency on 1/7/2014 and 14/7/2014.</li> <li>• Strategic transport assessment of revised Local Plan growth scenarios.</li> <li>• Park &amp; Ride Strategy.</li> <li>• Feasibility and design of proposed new transport schemes in Guildford borough, to create a deliverable Project List.</li> <li>• Guildford BC to commission Guildford Town Centre Highway Assessment (GOTCHA) Study.</li> </ul>
22/10/2014	<p>Meeting</p> <p>Transport Action Group of the Enterprise M3 Local Enterprise Partnership</p> <p>Enterprise M3 Local Enterprise Partnership / Hampshire CC / Surrey CC / Highways Agency / Guildford BC representing Surrey districts / Department for Transport / Network Rail / South West Trains / Stagecoach Bus / other parties</p>	<ul style="list-style-type: none"> <li>• Results of scheme prioritisation for Sustainable Transport Programme 2015/16 including the Guildford Riverside Route.</li> <li>• Draft Route Study for the M25 to Solent route will be published early in 2015 by Highways Agency, following completion of Evidence Report in April 2014. Final Route study in March 2015. This will feed into Road Investment Strategy.</li> <li>• Network Rail's preparation of a Wessex Route Study will be finalised in 2015. Consultation on a draft to be published in November 2014.</li> </ul>
23/10/2014	<p>Email</p> <p>Highways Agency to Guildford BC</p>	<p>Comments on draft specification for A3 Guildford impact assessment study of draft Local Plan.</p>

5/11/2014	Stakeholder briefing  Southern Rail Access to Heathrow  Network Rail / Surrey CC / Guildford BC / other parties	<ul style="list-style-type: none"> <li>• Market study to be completed by December 2014.</li> <li>• Conditional outputs to be tested.</li> <li>• Feasibility and option short listing study to be completed by June 2015.</li> <li>• Study will feed into the industry's Long-Term Planning Process.</li> </ul>
17/11/2014	Meeting  Guildford Joint Transport Planning & Infrastructure Officer Group (Joint Infrastructure Group)  Guildford BC / Surrey CC	<ul style="list-style-type: none"> <li>• Terms of Reference for group.</li> <li>• Update on Local Plan process and preparation of Infrastructure Delivery Plan.</li> <li>• Forthcoming Guildford town centre masterplanning exercise.</li> </ul>
19/11/2014	Meeting  North Camp station – parking  First Great Western / Surrey CC / Guildford BC / Rushmoor BC	<ul style="list-style-type: none"> <li>• Potential conflict between NR plans to shut the level crossing on Station Road and Hampshire County Council's desire to close the northern Station Road access due to road safety problems where it joins the roundabout junction.</li> <li>• Potential scheme to increase existing car park capacity by about 30 spaces.</li> </ul>
24/11/2014	Meeting  A3 transport  Guildford BC / Surrey CC / Highways Agency	<ul style="list-style-type: none"> <li>• Discussion about the approach to the assessment of the cumulative traffic impact of the emerging Local Plan.</li> <li>• Guildford BC to consider further how and when to initiate A3 Guildford impact assessment study of draft Local Plan to respond to issues raised by Highways Agency on 1/7/2014 and 14/7/2014.</li> </ul>

	/ University of Surrey / Martin Grant Homes / Wisley Property Investments	
4/12/2014	Meeting  Station planning in Guildford  Guildford BC / Surrey CC / First Great Western / South West Trains / Network Rail	<ul style="list-style-type: none"> <li>• Main purpose of meeting was to discuss how rail and potential improvements could complement the proposed draft Local Plan.</li> <li>• Network Rail supportive of proposals for Merrow station.</li> <li>• Network Rail to review a timetable for a Park Barn station to determine whether it is feasible.</li> </ul>
9/12/2014	Meeting  Transport Action Group of the Enterprise M3 Local Enterprise Partnership  Enterprise M3 Local Enterprise Partnership / Hampshire CC / Surrey CC / Highways Agency / Guildford BC representing Surrey districts / Department for Transport / Network Rail / South West Trains / First Great Western / other parties	<ul style="list-style-type: none"> <li>• LEP's forthcoming submission to the consultation on the Wessex Route Study draft.</li> <li>• A3 Guildford RIS scheme, as identified in the Department for Transport's Road Investment Strategy, first published in December 2014, will be developed during Road Period 1.</li> </ul>



9/1/2015	<p>Meeting</p> <p>Guildford Joint Infrastructure Group</p> <p>Guildford BC / Surrey CC / Highways Agency</p>	<ul style="list-style-type: none"> <li>• Guildford BC to provide to Highways Agency its outline designs for interim schemes on A3 Guildford to precede future A3 Guildford RIS scheme.</li> <li>• Guildford BC to revise draft specification for A3 Guildford impact assessment study of draft Local Plan.</li> <li>• Guildford BC-led 'hotspots study' to identify stand-alone highway improvements on Local Road Network.</li> <li>• Surrey CC officers nominated to GOTCHA study working group.</li> <li>• Future rail improvements.</li> <li>• Feasibility and design of Sustainable Movement Corridor.</li> <li>• LEP-funded projects.</li> </ul>
12/1/2015	<p>Meeting</p> <p>Enterprise M3 meeting</p> <p>Enterprise M3 Local Enterprise Partnership / Guildford BC</p>	<ul style="list-style-type: none"> <li>• Progress with Local Plan-making.</li> <li>• Improvement of A3 trunk road.</li> <li>• Connections between Guildford and Woking.</li> </ul>
13/1/2015	<p>Stakeholder forum</p> <p>North Downs Line stakeholder forum</p> <p>Surrey CC / Enterprise M3 Local Enterprise Partnership / First Great Western / Gatwick Airport / Guildford BC / Network Rail / South West Trains / other third parties</p>	<ul style="list-style-type: none"> <li>• Surrey CC-commissioned North Downs Line Assessment – background and purpose, baseline review, opportunities and constraints, assessment framework and next steps.</li> <li>• Discussions about above.</li> </ul>
28/1/2015	<p>Meeting</p> <p>Guildford BC/Surrey</p>	<ul style="list-style-type: none"> <li>• Discussion regarding roles and responsibilities with respect to transport planning and bus provision.</li> </ul>

	<p>CC councillors and lead officers: approach to transport planning and bus provision</p> <p>Surrey CC / Guildford BC</p>	
30/1/2015	<p>Meeting</p> <p>Guildford-Surrey Board</p> <p>Guildford BC / Surrey CC / other third parties</p>	<ul style="list-style-type: none"> <li>• Local Plan.</li> <li>• Guildford town centre masterplanning study.</li> <li>• North street development.</li> <li>• Strategic site at Wisley.</li> </ul>
12/2/2015	<p>Meeting</p> <p>Guildford BC-Surrey CC stocktake meeting</p> <p>Guildford BC / Surrey CC</p>	<ul style="list-style-type: none"> <li>• Discussion regarding priorities for transport and redevelopment projects.</li> </ul>
20/2/2015	<p>Meeting</p> <p>Transport Action Group of the Enterprise M3 Local Enterprise Partnership</p> <p>Enterprise M3 Local Enterprise Partnership / Hampshire CC / Surrey CC / Highways</p>	<ul style="list-style-type: none"> <li>• Highways Agency advised that forthcoming Infrastructure Bill will establish Highways England.</li> <li>• Highways Agency considering whether there are any 'quick wins' that could be taken forward in advance of the A3 Guildford RIS scheme.</li> <li>• High level of response to Network Rail's consultation on Wessex Route Study draft.</li> </ul>

	Agency / Guildford BC representing Surrey districts / Rushmoor BC representing Hampshire districts / Department for Transport / South West Trains / Stagecoach Bus / other parties	
24/2/2015	Meeting Guildford Quick Wins [on A3 corridor] Highways Agency / Guildford BC / Surrey CC	<ul style="list-style-type: none"> <li>Quick-win proposals that Highways Agency is investigating to alleviate significant hotspots on the A3 corridor between A31 Hog's Back and Burpham.</li> </ul>
2/3/2015	Meeting Local Plan/strategic site-related assessment of highway mitigations Guildford BC / Surrey CC	<ul style="list-style-type: none"> <li>Surrey CC to undertake a bespoke cumulative assessment of impact of OGSTAR Scenario 7 on A3 and junctions, including consideration of potential access arrangements/network changes proposed by promoters of strategic sites.</li> </ul>
6/3/2015	Meeting Guildford Joint Infrastructure Group	<ul style="list-style-type: none"> <li>Scheme development of Guildford Gyratory Package.</li> <li>Scheme development of Guildford Sustainable Transport Package.</li> <li>Forthcoming Local Plan/strategic site-related assessment of highway mitigations.</li> <li>Surrey CC to write to Highways Agency to request that a steering group be established to coordinate A3-related study work between Highways Agency, Surrey CC and Guildford BC.</li> </ul>

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	Guildford BC /Surrey CC	
17/3/2015	Meeting  Guildford Local Plan meeting  Guildford BC / Highways Agency / Surrey CC / Waverley BC	<ul style="list-style-type: none"> <li>• Discussion on assumptions for a A3 Guildford impact assessment study of draft Local Plan to respond to issues raised by Highways Agency on 1/7/2014 and 14/7/2014.</li> <li>• Surrey CC to undertake a bespoke cumulative assessment of impact of OGSTAR Scenario 7 on A3 and junctions, including consideration of potential access arrangements/network changes proposed by promoters of strategic sites.</li> </ul>
25/3/2015	Memorandum of Understanding  Royal Surrey County Hospital / University of Surrey / Guildford BC / Surrey CC	<ul style="list-style-type: none"> <li>• Parties have agreed to work together for the benefit of all to progress matters regarding car parking and sustainable transport issues at the Royal Surrey County Hospital, the University of Surrey's Manor Park and Stag Hill sites and the Surrey Research Park.</li> </ul>
15/4/2015	Meeting  Blackwell Farm – highways and transport  University of Surrey / Guildford BC / Highways England / Surrey CC	<ul style="list-style-type: none"> <li>• Promoter's transport strategy.</li> </ul>
28/4/2015	Meeting  Reigate and Banstead BC / Guildford BC	<ul style="list-style-type: none"> <li>• Do not consider we share any strong transport connections.</li> </ul>
21/4/2015	Meeting	<ul style="list-style-type: none"> <li>• Discussion about scheme development for new rail stations at Mellow and Park Barn.</li> </ul>

	<p>Rail planning for Guildford borough</p> <p>Guildford BC / Network Rail</p>	<ul style="list-style-type: none"> <li>• Opportunity provided by future Guildford platform capacity scheme at Guildford rail station to replace Yorkie's Bridge with a structure which can carry buses for the Sustainable Movement Corridor.</li> <li>• Network Rail support the concept of providing a road bridge to allow closure of Ash level crossing.</li> </ul>
8/5/2015	<p>Meeting</p> <p>Surrey CC / Highways England/ Department for Transport / Guildford BC / Woking BC / Enterprise M3</p>	<ul style="list-style-type: none"> <li>• 'Quick wins' for the A3 were being investigated and progressed to a value management workshop.</li> <li>• Highways England proposed the need for complementary improvements on Local Road Network to support future A3 Guildford RIS scheme.</li> </ul>
20/5/2015	<p>Meeting</p> <p>Rushmoor Local Plan: Duty to Cooperate</p> <p>Rushmoor BC / Guildford BC</p>	<ul style="list-style-type: none"> <li>• Guildford BC-led 'hotspots study' to identify stand-alone highway improvements on Local Road Network, including for A31/A331 junction, for A3232 Ash Road and Guildford Road in Ash.</li> <li>• Recommended that Rushmoor BC contact Surrey CC for forecasts of cross boundary highway flows.</li> <li>• Guildford BC is working with Network Rail to explore the opportunity to deliver a new rail station at Park Barn.</li> </ul>
28/5/2015	<p>Meeting</p> <p>Guildford Joint Infrastructure Group</p> <p>Guildford BC / Surrey CC / Highways England</p>	<ul style="list-style-type: none"> <li>• Guildford BC propose to undertake the A3 Guildford impact assessment study of draft Local Plan (to respond to issues raised by Highways Agency on 1/7/2014 and 14/7/2014) following completion of bespoke cumulative assessment of impact of OGSTAR Scenario 7 on A3 and junctions, including consideration of potential access arrangements/network changes proposed by promoters of strategic sites, which is being undertaken by Surrey CC for Guildford BC.</li> <li>• LEP has agreed to combine provisional funding allocations for Guildford Gyratory Package and Guildford Sustainable Transport Package into a single package called the Guildford Town Centre Transport Infrastructure Package.</li> </ul>
15/6/2015	<p>Meeting</p> <p>Transport Action</p>	<ul style="list-style-type: none"> <li>• Highways England presentation and discussion on the next stages in the RIS process.</li> <li>• Surrey CC presentation and discussion on the economic case for developing and investing in a programme of transport improvements to reduce congestion, improve connectivity and ensure the economic vitality of the</li> </ul>

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	<p>Group of the Enterprise M3 Local Enterprise Partnership</p> <p>Enterprise M3 Local Enterprise Partnership / Hampshire CC / Highways Agency / Surrey CC Guildford BC representing Surrey districts / Department for Transport / Network Rail / South West Trains / Stagecoach Bus / other parties</p>	<p>area.</p> <ul style="list-style-type: none"> <li>• Guildford BC presentation and discussion on Guildford town centre masterplanning exercise.</li> <li>• Wessex Route Study to be published as final version in July 2015.</li> </ul>
30/6/2015	<p>Meeting</p> <p>A3 Guildford</p> <p>Highways England / Surrey CC / Guildford BC</p>	<ul style="list-style-type: none"> <li>• Highways England has three elements of study work with a bearing on the improvement of the A3 Guildford ; 'quick wins', the development of the A3 Guildford RIS scheme and the M25 South West Quadrant study.</li> <li>• Update on timetable for Local Plan-making given.</li> <li>• Highways England would like more definite proposals to be presented for Local Road Network by Guildford BC / Surrey CC.</li> </ul>
15/7/2015	<p>Meeting</p> <p>Surrey CC 'Stocktake' meeting with Guildford BC</p> <p>Surrey CC / Guildford BC</p>	<ul style="list-style-type: none"> <li>• This is one in a series of meeting that Surrey CC has convened with Surrey borough/district councils.</li> <li>• Guildford BC presentation on spatial planning and related transport planning activities for the borough, setting out Guildford BC activities and relationships with Surrey CC and Highways England activities.</li> </ul>
20/7/2015	<p>Email</p>	<ul style="list-style-type: none"> <li>• Until the strategic transport assessment is available, Guildford BC is not able to provide any definite</li> </ul>

	<p>Response to Rushmoor BC's consultation on Draft Submission Rushmoor Local Plan</p> <p>Guildford BC to Rushmoor BC</p>	<p>comments on Rushmoor BC's proposed spatial strategy in transport terms.</p> <ul style="list-style-type: none"> <li>• Since Rushmoor Core Strategy adopted in 2011, significant numbers of new homes have started to come forward in the adjoining Ash and Tongham urban area. The cumulative effect of Rushmoor's emerging spatial strategy, together with the new homes that have been approved in this part of Guildford borough, are a material consideration in the plan making processes for both our boroughs.</li> <li>• Guildford BC looks forward to working with Rushmoor BC in the further development of Rushmoor BC's Draft Infrastructure Plan.</li> </ul>
14/9/2015	<p>Meeting</p> <p>A3 progress meeting</p> <p>Guildford BC / Highways England</p>	<ul style="list-style-type: none"> <li>• Highways England is setting up project team for scheme development of A3 Guildford RIS scheme.</li> <li>• The scheme development of A3 Guildford RIS scheme is presently at Project Control Framework (PCF) stage 0. Highways England's timetable is to complete PCF stage 0 Options identification in November 2016 and PCF stage 2 Options selection in July 2017.</li> <li>• Highways England would like more definite proposals to be presented for Local Road Network by Guildford BC / Surrey CC.</li> <li>• Highways England proposed that Guildford BC and/or Surrey CC would be invited to act as a coordinator of Highways England's programme for planning A3 improvements, other transport infrastructure improvements and Guildford BC's Local Plan programme.</li> </ul>
16/9/2015	<p>Meeting</p> <p>Cumulative impact de-brief</p> <p>Surrey CC / Guildford BC</p>	<ul style="list-style-type: none"> <li>• Discussion of the results from bespoke cumulative assessment of impact of OGSTAR Scenario 7 on A3 and junctions, including consideration of potential access arrangements/network changes proposed by promoters of strategic sites.</li> <li>• Further study work agreed.</li> </ul>
21/9/2015	<p>Meeting</p> <p>Guildford Joint Infrastructure Group</p> <p>Guildford BC / Surrey CC</p>	<ul style="list-style-type: none"> <li>• Guildford BC anticipates that Highways England's emerging Paramics model can be used for the A3 Guildford impact assessment study of draft Local Plan (to respond to issues raised by Highways Agency on 1/7/2014 and 14/7/2014).</li> <li>• Guildford BC, working with Surrey CC, has identified schemes for the 34 'hotspots' identified in OGSTAR. Guildford BC propose to include these in the draft Infrastructure Delivery Plan.</li> <li>• Updates given on projects including A3/Egerton Road Tesco roundabout improvement scheme, Beechcroft Drive new access/road safety scheme.</li> </ul>

		<ul style="list-style-type: none"> <li>Surrey CC presentation and discussion on potential schemes to comprise the Guildford Town Centre Transport Infrastructure Package.</li> </ul>
7/10/2015	<p>Meeting</p> <p>Former Wisley airfield sustainable transport workshop</p> <p>Guildford BC / Surrey CC</p>	<ul style="list-style-type: none"> <li>Walking, cycling, and public transport improvements proposed by the applicant were discussed.</li> <li>Potential walking, cycling and public transport improvements were considered.</li> </ul>
8/10/2015	<p>Meeting</p> <p>Guildford Station Strategy Meeting</p> <p>Guildford BC / Network Rail</p>	<ul style="list-style-type: none"> <li>Network Rail is awaiting the priorities to be identified in Hendy report in November 2015 before firming up on the timing of the Guildford platform capacity scheme which could be delivered in either Control Period 6 or 7.</li> <li>Network Rail's GRIP 0 study is considering how to provide extra platform/through and layover capacity.</li> <li>Guildford BC will continue to press for Guildford station upgrade to be in the Control Period 6 programme.</li> <li>Guildford BC consider that there is an opportunity provided by future Guildford platform capacity scheme to replace Yorkie's Bridge with a structure which can carry buses for the Sustainable Movement Corridor.</li> <li>Martin Grant Homes to undertake a GRIP2 study for a Merrow station for review by Network Rail.</li> <li>Park Barn station is a priority for Guildford BC/Surrey CC and Guildford BC will lead on feasibility. Network Rail will provide support.</li> </ul>
15/10/2015	<p>Meeting</p> <p>Transport Action Group of the Enterprise M3 Local Enterprise Partnership</p> <p>Enterprise M3 Local Enterprise Partnership / Hampshire CC / Surrey CC / Highways Agency / Guildford BC representing Surrey</p>	<ul style="list-style-type: none"> <li>LEP in partnership with Thames Valley Berkshire, Coast to Capital and Solent LEPs are in the process of commissioning consultants, to look at the economic impact of investment in strategic transport corridors.</li> <li>Wessex Route Study published as final version in August 2015.</li> <li>Network Rail's Control Period 6 priorities include Woking Flyover. Whilst Guildford platform capacity scheme is a priority, it could be more prone to slippage post Control Period 6. The initial proposal for Guildford station identified for Control Period 6 is likely to be too expensive and a scaled down or phased scheme is now being looked at. This could include Platform '0' on the east side, freeing up Platform 2.</li> <li>Network Rail is continuing to work with Guildford BC on potential new stations at Merrow and Park Barn.</li> </ul>



	districts / Rushmoor BC representing Hampshire districts / Department for Transport / Network Rail / South West Trains / Stagecoach Bus / other parties	
21/10/2015	Meeting  Duty to Cooperate to define cross boundary issues and areas of agreement  Waverley BC / Woking BC / Guildford BC	<ul style="list-style-type: none"> <li>• Further discussion between Guildford BC and Waverley BC will be undertaken on the potential to align transport work/strategic transport assessment.</li> </ul>
3/11/2015	Meeting  Network Rail liaison meeting  Guildford BC / Network Rail / Surrey CC / Martin Grant Homes and consultant / University of Surrey's consultant	<ul style="list-style-type: none"> <li>• Consultation for the South Western franchise is opportunity for councils and site promoters/ developers to make views known about new stations and, any wishes to stop future services at those stations.</li> <li>• Two alternative locations for the Park Barn station to be considered.</li> <li>• Decision made by Hendy review that scheme development of Guildford platform capacity scheme is not to be progressed during Control Period 5.</li> <li>• Guildford BC to work with Network Rail on commissioning a feasibility study to examine options for a road bridge to replace Ash level crossing.</li> <li>• The new Great Western Railway franchise for the North Downs line will require a frequency of 3 trains per hour. This increase in frequency will occur in December 2018.</li> </ul>
27/11/2015	Meeting  Guildford Joint Infrastructure Group	<ul style="list-style-type: none"> <li>• Highways England has an indicative budget for A3 Guildford 'Quick Win' schemes in 2016/17 and 2017/18. Scheme development in 2016/17 continues, with value management process programmed for March 2016, and decisions in Q4 2015/16.</li> <li>• Scheme for improvement to A3 northbound off-slip to Tesco roundabout will not be ready for decision until June 2016.</li> </ul>

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	Guildford BC / Surrey CC / Highways England	<ul style="list-style-type: none"> <li>• Extremely high BCRs obtained in early assessment using A3 Paramics model for A3 Guildford RIS scheme. Tie-in with improved LRN will be important. Highways England commissioning study into the 'buildability' of the widening scheme.</li> <li>• Feasibility study into an A3 Guildford tunnel will report in Spring 2016.</li> <li>• Findings of consultation on Guildford Town Centre Transport Infrastructure Package.</li> <li>• Guildford BC gave update on the transport planning study work for draft Guildford Town Centre and Hinterland Masterplan and presented concepts for Sustainable Movement Corridor in Guildford town centre.</li> <li>• Update on transport planning workstream for the Local Plan including hotspots and site access work, emerging package of mitigation and timetable for new Strategic Highway Assessment.</li> <li>• Surrey CC reiterated that it would finalise the Guildford borough Transport Strategy &amp; Forward Programme following the adoption by Guildford BC of a new Local Plan.</li> <li>• Guildford BC confirmed the process as previously agreed for adding Local Plan-related 'hotspot' schemes on the LRN to Surrey CC's forward programme, namely achieving sign-off from Surrey CC's Transport Development Planning and Area Highways Manager leads for Guildford borough.</li> <li>• Discussion of potential proposals for Local Growth Fund Round 3 Expressions of Interest.</li> <li>• Guildford BC anticipates that Highways England's emerging Paramics model can be used for the A3 Guildford impact assessment study of draft Local Plan (to respond to issues raised by Highways Agency on 1/7/2014 and 14/7/2014), as opposed to previously 2014 agreed methodological approach.</li> </ul>
3/12/2015	<p>Meeting</p> <p>Guildford and Woking Strategic Transport Infrastructure Group</p> <p>Highways England / Department for Transport / Surrey CC / Network Rail / South West Trains / Guildford BC / Woking BC</p>	<ul style="list-style-type: none"> <li>• Highways England gave a verbal update on progress with the scheme development of A3 Guildford RIS scheme.</li> </ul>
7/12/2015	<p>Stakeholder event</p> <p>Influencing strategic</p>	<ul style="list-style-type: none"> <li>• Outline of study objectives, area, stages, metrics, emerging findings, assumptions, conclusions and next steps.</li> <li>• Feedback including on metrics and emerging findings.</li> </ul>

	<p>transport in the South East</p> <p>Enterprise M3 Local Enterprise Partnership / Hampshire CC / Guildford BC / Surrey Heath BC / Woking BC / other third parties</p>	
11/12/2015	<p>Meeting</p> <p>GOTCHA modelling update meeting</p> <p>Guildford BC / Surrey CC</p>	<ul style="list-style-type: none"> <li>• Update on Guildford town centre Paramics base model, and scenario definition.</li> <li>• Update on Sustainable Movement Corridor study work.</li> </ul>
17/12/2015	<p>Meeting</p> <p>Parameters for a study of on-street and off-street bus interchange options for Guildford town centre</p> <p>Guildford BC / Surrey CC</p>	<ul style="list-style-type: none"> <li>• Procurement, assumptions, outputs, timescales for proposed study.</li> </ul>
12/01/2016	<p>Meeting</p> <p>Duty to Cooperate meeting</p> <p>Waverley BC /</p>	<ul style="list-style-type: none"> <li>• Transport including the A3, the A281 at Shalford and Guildford town centre gyratory.</li> </ul>

	Guildford BC	
15/1/2016	Stakeholder event North Downs summit  Great Western Railway / Enterprise M3 Local Enterprise Partnership / Surrey CC Guildford BC / other third parties	<ul style="list-style-type: none"> <li>• Great Western Railway's plans for improving the North Downs Line including rail electrification and line speed improvements, station works and additional services.</li> <li>• Great Western Railway seeking support from local authorities.</li> </ul>
21/1/2016	Meeting  Enterprise M3 Joint Leaders Board  Enterprise M3 Local Enterprise Partnership / Guildford BC / Woking BC / Rushmoor BC / Surrey Heath BC / Hampshire CC / other third parties	<ul style="list-style-type: none"> <li>• Cross-LEP transport study has been commissioned considering the economic benefits of investment in transport routes.</li> <li>• Will be used to seek to strengthen influence on agencies including Network Rail and Highways England in realising strategic transport investments in the South East.</li> </ul>
28/01/2016	Meeting  Guildford town centre steering group  Guildford BC/ Surrey CC	<ul style="list-style-type: none"> <li>• Proposed Guildford town centre regeneration plan.</li> <li>• Studies ongoing and forthcoming including bus study, testing of changes to highway network, and Sustainable Movement Corridor.</li> <li>• Parking strategy was being prepared by Guildford BC Parking Services.</li> </ul>
11/2/2016	Meeting	<ul style="list-style-type: none"> <li>• Draft GRIP 2 brief for Guildford West (Park Barn) study.</li> <li>• Guildford platform capacity scheme likely to be a Control Period 7 or later scheme due to funding constraints</li> </ul>

	<p>Network Rail liaison meeting</p> <p>Guildford BC / Network Rail / Surrey CC / University of Surrey's consultant / Martin Grant Home's consultant</p>	<p>with a potential interim Platform '0' scheme in Control Period 6.</p> <ul style="list-style-type: none"> <li>• Network Rail consider that the replacement of Yorkie's Bridge may be required for Guildford platform capacity scheme but not for the potential interim Platform '0' scheme.</li> <li>• Surrey CC undertaking a transport assessment/access appraisal for access to Guildford East (Merrow) station via Surrey CC land.</li> <li>• Meeting to be arranged with Department for Transport's South Western franchise team to brief them on the proposals for new rail stations at Guildford West (Park Barn) and Guildford East (Merrow).</li> </ul>
22/2/2016	<p>Letter</p> <p>Guildford BC's response to Dunsfold Park planning application to Waverley BC</p>	<ul style="list-style-type: none"> <li>• Advised that a significant proportion of the site's trip generation will result in people and vehicles travelling on roads in Guildford borough.</li> <li>• Guildford BC suggested that Waverley BC ask applicant's transport consultant to confirm that they have incorporated all of Surrey CC's comments.</li> <li>• Posed queries about proposed junction mitigation schemes at A281/A248 Shalford junctions in Guildford borough.</li> <li>• Requests that the applicant assesses the impacts of the additional traffic flows on the operation of the Guildford gyratory. Until the level of impact has been fully assessed within Guildford borough area we are unable to advise further on the likely traffic impacts and Guildford BC's view on the acceptability of the proposed mitigation within Guildford BC's boundary.</li> <li>• Expect the applicant to demonstrate that they have maximised opportunities for sustainable transport choices and this include measures to encourage people to use means of transport other than the private car for accessing Guildford town centre and other destinations, and would expect this to include improvements to local bus services and improved or additional Park and Ride facilities.</li> </ul>
24/2/2016	<p>Meeting</p> <p>Transport Action Group of the Enterprise M3 Local Enterprise Partnership</p> <p>Enterprise M3 Local Enterprise Partnership / Hampshire CC /</p>	<ul style="list-style-type: none"> <li>• Business case scrutiny for Guildford town centre transport infrastructure package.</li> <li>• Commission for the M25 South West Quadrant Study due to be let shortly.</li> <li>• Network Rail advised that, following Hendy review, it may be difficult to priorities Woking Flyover in Control Period 6 as full benefits will not be realised until Crossrail 2 is delivered. Also that Guildford station platform capacity scheme remains a priority scheme, albeit initially a smaller scheme may be taken forward.</li> </ul>

	Surrey CC / Highways England / Guildford BC representing Surrey districts / Rushmoor BC representing Hampshire districts / Department for Transport / Network Rail / South West Trains / Stagecoach Bus / other parties	
24/2/2016	Meeting  Strategic Road Network and Local Plan processes  Guildford BC / Highways England / Surrey CC / Waverley BC	<ul style="list-style-type: none"> <li>• Highways England's position on status of A3 Guildford RIS scheme, as a Road Period 2 scheme, is that it is not a committed scheme.</li> <li>• Surrey CC suggested that Highways England's emerging Paramics model could be used for the A3 Guildford impact assessment study of draft Local Plan (to respond to issues raised by Highways Agency on 1/7/2014 and 14/7/2014), as opposed to previously 2014 agreed methodological approach.</li> <li>• Highways England advised that there will be funding decisions on 'quick win' schemes in April 2016 including A3 northbound off-slip lane widening at University Interchange (approaching Tesco roundabout) improvement scheme, A3 southbound off-slip land widening to A320 Stoke Interchange improvement scheme, and Beechcroft Drive new access/road safety scheme.</li> <li>• Possibility of preparing a Statement of Common Ground. Waverley BC indicated that would like to be party to this.</li> <li>• Waverley BC proposed doing a joint strategic highway assessment for forthcoming Guildford and Waverley borough Regulation 19 Local Plans.</li> <li>• Guildford BC's draft list of proposed transport schemes for Infrastructure Schedule/Infrastructure Delivery Plan to accompany Regulation 19 Local Plan (2016) circulated.</li> </ul>
26/2/2016	Email  Highways England to Guildford BC	<ul style="list-style-type: none"> <li>• Statements of common ground agreed with Vale of White Horse DC and Oxford CC.</li> </ul>
1/3/2016	Email	<ul style="list-style-type: none"> <li>• Guildford BC's view on the purpose and proposed content of a potential statement of common ground with Highways England.</li> </ul>

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	Guildford BC to Highways England	
8/3/2016	Email Guildford BC to Highways England	<ul style="list-style-type: none"> <li>• Details of previous strategic transport assessments undertaken for the Guildford borough Local Plan process and discussions on previously Highways Agency-requested additional study work, in order that Highways England can provide up-to-date confirmation and advice on its requirements with respect to the forthcoming transport evidence base to accompany consultation on Regulation 19 Local Plan (2016). Guildford BC's working assumption that Highways England will be able to form a view on Regulation 19 Local Plan (2016) based on the transport evidence base comprising: <ul style="list-style-type: none"> <li>○ a new strategic transport assessment which uses the same methodology and presents the same outputs as published in the OGSTAR report, plus additionally considering the impact of a package of transport improvements as per the list provided at 24/2/2016 meeting on 24 February 2016.</li> <li>○ previously Highways Agency-requested A3 Guildford impact assessment study of draft Local Plan to respond to issues raised by Highways Agency on 1/7/2014 and 14/7/2014 using 2014 agreed methodological approach.</li> </ul> </li> </ul>
8/3/2016	Email Guildford BC to Highways England	<ul style="list-style-type: none"> <li>• Draft text for policy I2 and also for a requirement relating to potential provision of all movements junction in site policy A25 Gosden Hill Farm for comment by Highways England.</li> </ul>
1/3/2016	Email Highways England to Guildford BC	<ul style="list-style-type: none"> <li>• Clarification of the position of Highways England proposals for the A3 through Guildford and the understanding of investment status of schemes.</li> <li>• A3 Guildford RIS scheme: <ul style="list-style-type: none"> <li>○ A3 Guildford RIS scheme options are at a feasibility stage (Project Control Framework stage 0) into assessing the initial impacts of an online widening solution and to determine their deliverability. A 'local options' paper is being prepared designed to encourage discussion with both Guildford BC and Surrey CC into formalising a strategy to tackling existing known local network 'hotspots' and those that have been highlighted by potential improvements to the strategic road network. Outcomes from officer involvement and consideration of Guildford's draft local plan will then feed into detailed strategic modelling work programmed to be undertaken in 2017/18, prior to any form of project public consultation.</li> <li>○ A3 Guildford RIS scheme must continue to have a</li> </ul> </li> </ul>

		<p>positive value for money case (Project Control Framework – stage 5 end of development is where the commitment to construct is taken).</p> <ul style="list-style-type: none"> <li>○ Likely that delivery would be towards the end of the next Roads Period 2 if a commitment to construct is taken.</li> <li>○ This timescale does not take into account the outcomes of the Guildford tunnel feasibility study. Based upon the previous experience of tunnels this would be beyond the delivery timescale of Roads Period 2.</li> <li>• Small Improvements:       <ul style="list-style-type: none"> <li>○ Currently have secured funding (up to end March 2016) to undertake feasibility studies into the following small improvements to tackle existing safety and congestion issues:           <ul style="list-style-type: none"> <li>▪ A3 Beechcroft Drive</li> <li>▪ A3 Onslow offslip widening</li> <li>▪ A3 Guildford safety enforcement cameras</li> <li>▪ A3 Stoke offslip widening</li> </ul> </li> <li>○ Detailed design and works are programmed to be undertaken over the next two financial years, with associated funding awaiting confirmation in Spring 2016. Should schemes not be funded they will remain within our asset needs register and continue to be promoted by the Highways England Route Sponsor team.</li> </ul> </li> </ul>
1/3/2016	<p>Meeting</p> <p>Guildford Joint Infrastructure Group</p> <p>Guildford BC / Surrey CC / Highways England</p>	<ul style="list-style-type: none"> <li>• Highways England's A3 Guildford RIS scheme project team is progressing development of scheme options, and also looking in greater detail for impacts on the Local Road Network. Buildability of a scheme remains a risk, although a recent Highways England workshop came up with possible solutions. Earliest date for start of construction is 2023.</li> <li>• Highways England's A3 tunnel feasibility study is progressing.</li> <li>• Guildford BC's draft list of proposed transport schemes for Infrastructure Schedule/Infrastructure Delivery Plan to accompany Regulation 19 Local Plan (2016) circulated.</li> <li>• Guildford BC's early draft of the forthcoming Guildford Borough Transport Strategy circulated.</li> <li>• Guildford town centre transport infrastructure package has been adjudged as a 'sound business case' by the LEP.</li> <li>• Local Growth Fund round 3 expressions of interest bids.</li> </ul>



4/3/2016	<p>Meeting</p> <p>Guildford/Waverley infrastructure collaboration</p> <p>Surrey CC / Waverley BC / Guildford BC</p>	<ul style="list-style-type: none"> <li>• Waverley BC expressed concern that Guildford BC proposing to reduce the capacity of the Guildford gyratory.</li> <li>• Guildford BC's draft list of proposed transport schemes for Infrastructure Schedule/Infrastructure Delivery Plan to accompany Regulation 19 Local Plan (2016) circulated.</li> </ul>
11/3/2016	<p>Email</p> <p>Highways England to Guildford BC</p>	<ul style="list-style-type: none"> <li>• Recognise that average peak period assessment has been used as a starting point when considering the full quantum of growth at end of Local Plan period and what strategic infrastructure is needed to deliver that growth.</li> <li>• Highways England require peak hour assessment as average peak period will not consider the worst case. This will inform at what point in time an improvement would be needed in the Local Plan period before safety concerns on the A3 would arise and what smaller improvements could be delivered and when in the intervening period to enable growth to come forward.</li> <li>• Level of uncertainty on what improvements on the A3 can be delivered by a A3 Guildford RIS scheme and the quantum of growth any improvements will facilitate during the Local Plan period.</li> <li>• With the earliest potential delivery of a scheme not until towards of the RIS2 period, there would still need to be approximately ten years of Local Plan growth (regardless of RIS proposals) that need to be demonstrated can be delivered without having an adverse impact on the A3. If sites are reliant upon mitigation during this early part of the plan period without impacting on the safety of the A3, the agreed infrastructure and/or transport package needs to be identified as critical.</li> <li>• The deliverability of any critical infrastructure should be fully assessed and it demonstrated that there was a reasonable prospect of delivery (including cost, who is funding, when it is needed etc.)</li> <li>• Highways England would not support (and possibly object to Highways England/RIS associations within policy) of draft text for a requirement relating to potential provision of all movements junction in site policy A25 Gosden Hill Farm as Highways England currently has no plans for, or plans to promote, an improvement of this nature at this location, and it has not yet been identified as required to support future RIS proposals. It is unclear at this stage if proposals at Gosden Hill Farm are reliant on this improvement to come forward to be viable. Notes that it was indicated at most recent meeting this was not needed to support the development.</li> </ul>

<p>15-16/3/2016 and responses received from parties as identified opposite</p>	<p>Email</p> <p>Guildford BC to Surrey CC / Mole Valley DC / Rushmoor BC / Waverley BC / Woking BC / Highways England / Network Rail / South West Trains / Great Western Railway / Enterprise M3 Local Enterprise Partnership / Department for Transport</p>	<ul style="list-style-type: none"> <li>• Transport Strategy was provided for comment.</li> <li>• Elmbridge BC, Rushmoor BC, Surrey Heath BC, Highways England, Network Rail and Great Western Railway. Where considered appropriate, the draft document was revised to address comments.</li> </ul> <p>Draft of the first issue of the Guildford Borough</p> <p>Comments were received from Surrey CC,</p>
<p>18/3/2016</p>	<p>Meeting</p> <p>Surrey CC modelling of strategic sites – discussion</p> <p>Surrey CC / Guildford BC</p>	<ul style="list-style-type: none"> <li>• This was a follow-up to a previous meeting on 16/9/2015.</li> <li>• Discussion of the results from bespoke cumulative assessment of impact of OGSTAR Scenario 7 on A3 and junctions, including consideration of potential access arrangements/network changes proposed by promoters of strategic sites.</li> </ul>
<p>21/3/2016</p>	<p>Meeting</p> <p>New Guildford and Waverley Local Plans transport evidence bases</p> <p>Guildford BC / Highways England / Waverley BC / Surrey CC</p>	<ul style="list-style-type: none"> <li>• Highways England to review draft Statement of Common Ground and drafts of policies I1: Infrastructure and delivery, I2: Supporting the Department for Transport’s “Road Investment Strategy”, I3: Sustainable transport for new developments, and site policy A25 Gosden Hill Farm.</li> <li>• Meeting to be set up with senior representatives of Guildford BC ,Waverley BC, Surrey CC, Department for Transport and the Enterprise M3 Local Enterprise Partnership to discuss Highways England’s positioning with respect to RIS schemes and approach to supporting Guildford BC and Waverley BC Local Plan processes.</li> </ul>

22/3/2016	Email  Guildford BC to Highways England / Waverley BC / Surrey CC	<ul style="list-style-type: none"> <li>• Actions from meeting on 21/3/2016.</li> <li>• Electronic copies of draft documents for comment as distributed at meeting on 21/3/2016, plus draft policy I1.</li> </ul>
30/3/2016	Email  Highways England to Guildford BC	<ul style="list-style-type: none"> <li>• Comments on draft policies I1, I2, I3 and site policy A25 Gosden Hill Farm.</li> <li>• With respect to draft text for a requirement relating to potential provision of all movements junction in draft policy A25 Gosden Hill Farm, Highways England would likely make a representation of unsoundness for this policy on the basis Highways England have no current plans for an improvement at this junction, and we have no requirement to safeguard land for future needs in relation to RIS at the junction. It remains unclear if proposals at Gosden Hill are reliant upon such an improvement during this plan period, therefore any critical infrastructure to facilitate growth at Gosden Hill should be identified in Guildford's Infrastructure Delivery Plan.</li> </ul>
19/4/2016	Meeting  Merrow Station (Guildford east), Gosden Hill, Guildford  Department for Transport / Martin Grant Homes / Surrey CC / Guildford BC	<ul style="list-style-type: none"> <li>• Meeting with Department for Transport's South Western franchise team to brief them on the proposals for new rail station at Guildford East (Merrow), including background and summary of work to date.</li> </ul>
26/4/2016	Meeting  A3 strategic group meeting  Highways England / Department for Transport / Surrey CC	<ul style="list-style-type: none"> <li>• Highways England gave a verbal update on progress with the scheme development of A3 Guildford RIS scheme.</li> <li>• A3 tunnel feasibility study work due to be completed by July 2016.</li> <li>• Highways England commissioned a 'local options' report which considers non-Strategic Road Network schemes.</li> </ul>

	/ Enterprise M3 Local Enterprise Partnership / Network Rail / South West Trains / Guildford BC / Woking BC	
27/4/2016	Meeting  Collaboration meeting  Waverley BC / Surrey CC / Guildford BC	<ul style="list-style-type: none"> <li>• Progress with joint strategic highway assessment for forthcoming Guildford and Waverley borough Regulation 19 Local Plans.</li> <li>• Potential statement of common ground between Highways England, Surrey CC, Guildford BC and Waverley BC.</li> </ul>
28/4/2016	Meeting  Guildford town centre steering group  Guildford BC/ Surrey CC	<ul style="list-style-type: none"> <li>• Status of potential North Street redevelopment.</li> <li>• Guildford town centre Paramics traffic model testing.</li> <li>• Preparation of parking strategy.</li> <li>• Bridge Street road safety petition.</li> <li>• Preparation of proposed Guildford town centre regeneration plan.</li> <li>• Bus study.</li> <li>• New rail stations at Guildford West (Park Barn) and Guildford East (Merrow).</li> <li>• Guildford station redevelopment.</li> <li>• LEP bids.</li> </ul>
May 2016 – October 2017	Various meetings regarding the mitigation package for the Strategic Road Network proposed by the applicant Wisley Property Investments with respect to planning application 15/P/00012 for the former Wisley airfield site, including the	<p>A number of meetings have been held during this period regarding the mitigation package for the Strategic Road Network proposed by the applicant Wisley Property Investments with respect to planning application 15/P/00012 for the former Wisley airfield site, including the north facing junctions to the A3 proposed at the A247 Clandon Road (Burnt Common) interchange.</p> <p>This planning application was validated in January 2015, refused in April 2016, and subsequently appealed with the planning inquiry in September-October 2017.</p> <p>In this table, these various meetings are represented by this row.</p> <p>Local Plan-focused meetings with Highways England and Surrey CC, which have also involved , in part, discussion regarding the north facing junctions to the A3 proposed at the A247 Clandon Road (Burnt Common) interchange as</p>

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	<p>north facing junctions to the A3 proposed at the A247 Clandon Road (Burnt Common) interchange.</p> <p>Variously involving Guildford BC and one or both of Surrey CC and Highways England and also, variously, representatives of Wisley Property Investments.</p>	<p>proposed in the Regulation 19 Local Plan (2016) and subsequently (schemes referenced SRN9 and SRN10) are represented in separate rows.</p>
9/5/2016	<p>Meeting</p> <p>Meeting with Highways England to discuss transport alteration to Local Plan</p> <p>Guildford BC / Highways England / Surrey CC</p>	<ul style="list-style-type: none"> <li>• Surrey CC consider that schemes for north facing junctions to the A3 at the A247 Clandon Road (Burnt Common) [schemes SRN9 and SRN10] would mitigate the impact of the development traffic flows in Ripley village resulting from the development of a new settlement at the former Wisley airfield site, as well as limiting any increase in traffic joining and leaving the A3 at the Ockham interchange.</li> <li>• Guildford BC propose amendments to the draft of the Regulation 19 Local Plan (2016) consultation document to introduce site policies which will provide land to facilitate the provision of the north facing junctions to the A3 at the A247 Burnt Common and to introduce this scheme.</li> <li>• Highways England asked questions about the design of the scheme, including road safety considerations, delivery and funding, and its relationship to the rejected planning application and any future planning application for the development of the former Wisley airfield site.</li> </ul>
17/5/2016	<p>Stakeholder reference group meeting</p> <p>M25 South West Quadrant Strategic Study</p>	<ul style="list-style-type: none"> <li>• Stakeholders considered long list of interventions which could contribute to addressing congestion on the M25 South West Quadrant, and process by which interventions could be packaged and assessed.</li> </ul>

	Department for Transport / Highways Engand / Enterprise M3 Local Enterprise Partnership / Guildford BC / other third parties		
17/5/2016	Meeting  Discussion of High Level Findings of Guildford Strategic Highway Assessment  Guildford BC / Surrey CC	<ul style="list-style-type: none"> <li>•</li> <li>•</li> </ul>	Discussion of findings. Process for finalising report for publication.
20/5/2016	Meeting  Duty to Cooperate – Rushmoor BC and Guildford BC - Emerging transport evidence base related to Guildford borough  Rushmoor BC / Guildford BC	<ul style="list-style-type: none"> <li>• Guildford borough Local Plan process.</li> <li>• Strategy 2016 following comments from Rushmoor BC to Guildford BC on 1/4/2016.</li> <li>• site between Regulation 18 Local Plan (2014) and Regulation 19 Local Plan (2016).</li> <li>• will include cross boundary highway analysis.</li> </ul>	General discussion on transport evidence base for  Amendments to draft Guildford Borough Transport Changes to proposed access to Blackwell Farm 2016 strategic highway assessment (SHAR 2016)
26/05/2016	Meeting  Guildford Joint Infrastructure Group  Guildford BC / Surrey CC / Highways Agency	<ul style="list-style-type: none"> <li>• begin on 6 June. Strategic highway assessment (SHAR 2016) and LMVR to be published concurrently.</li> <li>• draft Guildford borough Transport Strategy in March/April. Second issue to be published on 6 June in parallel with consultation on Regulation 19 Local Plan (2016).</li> <li>• A3 tunnel feasibility study work in summer 2016.</li> </ul>	Consultation on Regulation 19 Local Plan (2016) to Surrey CC and Highways England comments on Highways England's is aiming for public release of

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		<ul style="list-style-type: none"> <li>Highways England's early targeted improvement schemes have not obtained funding in latest internal funding round; will remain on network needs list until funding is available.</li> <li>Highways England's Route strategy consultation document has been circulated.</li> <li>Also discussed minutes from last Guildford Town Centre Steering Group meeting, Enterprise M3 LEP Local Growth Fund round 3 bids and Guildford West (Park Barn) study ongoing.</li> </ul>
27/5/2016	<p>Meeting</p> <p>Guildford-Surrey Board</p> <p>Guildford BC / Surrey CC / Enterprise M3 Local Enterprise Partnership / other third parties</p>	<ul style="list-style-type: none"> <li>Board received a presentation on the Guildford Borough Transport Strategy.</li> </ul>
8/6/2016	<p>Meeting</p> <p>Transport Action Group of the Enterprise M3 Local Enterprise Partnership</p> <p>Enterprise M3 Local Enterprise Partnership / Hampshire CC / Highways England / Guildford BC representing Surrey districts / Department for Transport / South West Trains / Stagecoach Bus /</p>	<ul style="list-style-type: none"> <li>Cross-LEP transport study has been completed.</li> <li>Business case for the Guildford Town Centre Transport Infrastructure Package has been approved by the LEP Board.</li> <li>Guildford bus-based rapid transport network identified as a candidate scheme for DfT's Large Local Majors Fund; another scheme shortlisted as the LEP's submission.</li> <li>Highways England advised that planning to be in a position where could begin consultation with the public from 2019 on A3 Guildford RIS scheme. Highways England also currently undertaking feasibility study work into the provision of a tunnel at Guildford. This study work is programmed to complete by the end of summer 2016 and will be made available to the public. There are currently no committed funds for progressing a tunnel beyond feasibility stage.</li> <li>Network Rail's update for North Downs Line that currently working with Great Western Railways and DfT on the proposal to operate 3 trains per hour (2tph to Gatwick and 1tph to Redhill). Network Rail have raised level crossings as a concern owing to the increased safety risk. These discussions will continue to understand if funding is available to mitigate the risk.</li> </ul>

	other parties	
14/6/2016	Meeting Rushmoor Local Plan: Duty to Cooperate  Rushmoor BC / Guildford BC	<ul style="list-style-type: none"> <li>• improvements identified, including new railway station at Guildford West (Park Barn).</li> <li>• as both Local Plans progress</li> </ul> <p>Rushmoor BC officers welcomed transport Agreed to continue to engage on transport issues</p>
30/6/2016	Meeting  Guildford town centre steering group  Guildford BC/ Surrey CC	<ul style="list-style-type: none"> <li>• Scheme development of road safety scheme for Onslow Street/Bridge Street.</li> <li>• Guildford town centre Paramics traffic model testing.</li> <li>• Bus study.</li> <li>• Status of potential North Street redevelopment.</li> <li>• Scheme development of environmental improvement scheme for Castle Street.</li> </ul>
8/7/2016	Meeting  Blackwell Park, Guildford  Univeristy of Surrey / Guildford BC / Surrey CC	<ul style="list-style-type: none"> <li>• Modelling inputs and outputs that were used for proposed Blackwell Farm site in the SHAR 2016 strategic highway assessment.</li> </ul>
21/7/2016	Meeting  Highways England's representation to Regulation 19 Local Plan (2016) consultation	<ul style="list-style-type: none"> <li>• To discuss Highways England's concerns, as expressed in its representation to Regulation 19 Local Plan (2016) consultation, that the 2016 strategic highway assessment (SHAR 2016) was deficient and response to these concerns.</li> </ul>



	Guildford BC / Surrey CC	
26/7/2016	Meeting  A3 strategic group meeting  Highways England / Department for Transport / Surrey CC / Network Rail / Guildford BC / Woking BC	<ul style="list-style-type: none"> <li>• Discussion of Highways England's representation to Regulation 19 Local Plan (2016) consultation.</li> <li>• Highways England gave a verbal update on progress with the scheme development of A3 Guildford RIS scheme and also the A3 tunnel feasibility study.</li> <li>• Highways England will be preparing a 'position statement'-type document on the A3 tunnel feasibility study. Also that Highways England has target date of autumn 2016 for release of report(s) on tunnel and widening schemes.</li> <li>• Highways England will meet Surrey CC regarding its 'local options' report before meeting with Guildford BC.</li> </ul>
12/8/2016	Letter  Guildford BC to Highways England	<ul style="list-style-type: none"> <li>• Letter responding to various issues in Highways England's representation of 18/6/2016 on Regulation 19 Local Plan (2016). Also seek further clarification of Highways England's position and to highlight apparent inconsistencies and inaccuracies in Highways England's representation.</li> <li>• Three principal comments with respect to Highways England's representation are: <ul style="list-style-type: none"> <li>○ Highways England's rejection of Plan-making on the basis of RIS schemes.</li> <li>○ Highways England's proposal for a test of impact on transport grounds could breach national planning policy.</li> <li>○ Highways England's changed position on modelling evidence base.</li> </ul> </li> <li>• Further detailed comments set out in appendices: <ul style="list-style-type: none"> <li>○ Appendix A is Guildford BC note responding to Highways England's letter, Annex B and Annex C.</li> <li>○ Appendix B is Surrey CC note responding to Highways England's Annex A.</li> </ul> </li> </ul>
1/9/2016	Meeting  Guildford Local Plan Meeting  Guildford BC / Surrey CC / Highways England	<ul style="list-style-type: none"> <li>• Meeting to discuss the various issues in Highways England's representation of 18/6/2016 on Guildford borough Regulation 19 Local Plan (2016), and following letter from Guildford BC to Highways England dated 12/8/2016.</li> <li>• Outcomes from the meeting were as follows: <ul style="list-style-type: none"> <li>○ Guildford BC to undertake plan-making on the basis of the delivery of the RIS schemes for both road periods 1 and 2, with appropriate caveats to be set out in the Draft Local Plan.</li> <li>○ Highways England to provide modelling assumptions for the minimum form of the RIS Road Period 1 and 2 schemes.</li> <li>○ Highways England to review its representation on 18/7/2016 to the consultation on the Regulation 19 Local</li> </ul> </li> </ul>

		<p>Plan (2016) consultation and to provide a replacement or supplementary letter providing new or further advice.</p> <ul style="list-style-type: none"> <li>○ Surrey CC/Guildford BC are to progress the strategic highway assessment on the basis of the August 2014 agreed approach, which involves assessment with the 2009 base Sintram model using the 'average peak hour' plus the three supplementary assessments.</li> <li>○ Highways England and Surrey CC to meet to review the future programme of strategic highway assessment work and any additional requirements.</li> </ul>
12/9/2016	<p>Telephone conversation</p> <p>Guildford BC to Surrey CC</p>	<ul style="list-style-type: none"> <li>● Catch up with Surrey CC to learn the outcomes of meeting between Highways England and Surrey CC regarding the future programme of strategic highway assessment work and any additional requirements.</li> <li>● Highways England would like evidence to be provided to identify the traffic impacts of Local Plan in interim years, so that can understand when mitigation required.</li> </ul>
15/9/2016	<p>Meeting</p> <p>Guildford Joint Infrastructure Group</p> <p>Guildford BC / Surrey CC / Highways England</p>	<ul style="list-style-type: none"> <li>● Highways England advised that work continues on the draft report for the A3 tunnel feasibility. This will be provided to the Department for Transport for comment.</li> <li>● Highways England advised that Route Strategy 2 process will not involve stakeholder workshops. The Route Strategy 2 reports are to be published by end March 2017.</li> <li>● Highways England proposed that the scope of its regular 'A3 Strategic Group' stakeholder meeting be incorporated within the Guildford Joint Infrastructure Group in future. This was agreed by Surrey CC and Guildford BC.</li> </ul>
3/10/2016	<p>Email</p> <p>Guildford BC's response to Waverley BC's Consultation on the Pre-submission Local Plan Part 1: Strategic Policies and Sites</p>	<ul style="list-style-type: none"> <li>● Advised that there is a difference between the assumptions regarding the timing of the A3 Guildford RIS scheme as used by Guildford BC in plan-making compared with those used by Waverley BC.</li> <li>● Request that the transport schemes to be delivered by the developer of the new settlement at Dunsfold Aerodrome, as identified in Waverley BC's draft Infrastructure Delivery Plan, should be included in the Local Plan itself.</li> <li>● Request that the key infrastructure requirement for 'Funding towards Guildford gyratory, park and ride provision at Artington (within Guildford Borough)' be revised to also include funding towards 'the delivery of improved vehicular access and pedestrian routes to car parks on the southern side of Guildford town centre' and 'the delivery of the Sustainable Movement Corridor'.</li> <li>● Request that the list of schemes located outside of Waverley borough, which are described as 'schemes that are deemed necessary for the Local Plan proposed level of growth' in the IDP, which includes schemes located in Guildford borough for developer contributions would be expected, should be included in the Local Plan itself.</li> </ul>

5/10/2016	Letter  Highways England to Guildford BC	<ul style="list-style-type: none"> <li>• Letter providing new advice on the Regulation 19 Local Plan (2016).</li> <li>• Highways England, referring to its letter dated 18 July 2016, stated that ‘...we have undertaken a review of our response; this letter superseded Highways England’s position in terms of representations.’ (p.1).</li> <li>• See Appendix 5 in Duty to Cooperate topic for review of this letter.</li> </ul>
11/10/2016	Meeting  Transport Action Group of the Enterprise M3 Local Enterprise Partnership  Enterprise M3 Local Enterprise Partnership / Hampshire CC / Surrey CC / Highways England / Guildford BC representing Surrey districts / Department for Transport / Network Rail / South West Trains / Stagecoach Bus / other parties	<ul style="list-style-type: none"> <li>• Highways England thanked the LEP and other stakeholders for their responses to the consultation for the M25 to Solent Route Strategy 2, which were helpful in formulating the update of the first Route Strategy. It is proposed that Route Strategy 2 will be published in March 2017.</li> <li>• Highways England advised that feasibility work is continuing for M25 Junction 10/A3 Wisley interchange RIS scheme. A public consultation is due early in 2017, with a preferred scheme identified by summer 2017.</li> <li>• For the A3 Guildford RIS scheme, Highways England advised that the identification of need is being carried out looking at online widening and tunnel feasibility, with model testing taking place in Spring 2017. There remains no funding for the early wins that have previously been identified, but Highways England will continue to bid for them when the opportunity arises.</li> <li>• Network Rail reported changes to Enhancement Funding following the Bowe Review. Network Rail have signed a Memorandum of Understanding with the Department for Transport that means enhancements will no longer be funded in five year control periods. This means that Network Rail will apply for funding at a Business Case level. Therefore funding will be applied to get to Strategic Outline Business Case, then if the scheme is still the right thing to do then funding will be sought to get to Outline Business Case and then to Final Business Case following that. This will allow Network Rail to have more certainty over outputs and cost before they commit to a scheme at Final Business Case.</li> <li>• Network Rail will be submitting its Initial Industry Advice (IIA) to the Department for Transport at the end of 2016. Although funding for enhancements is changing the IIA will include a list of the enhancement priorities for Control Period 6, particularly in relation to early development funding. For the Wessex Route those priorities are Woking Flyover, Woking Platform 6, Clapham Junction Pedestrian Congestion Relief, and Guildford Platform 0.</li> <li>• Network Rail advised that working with Guildford BC to look at Guildford Station in a wider context to ensure operational rail requirements and wider development and economic growth requirements are taken account of.</li> <li>• Network Rail is engaged in an advisory capacity to Guildford BC on the scheme development of Guildford West (Park Barn) railway station and will formally review the GRIP 2 study.</li> </ul>
8/11/2016	Workshop  Southern rail access to Heathrow study	<ul style="list-style-type: none"> <li>• Presentation of the Surrey CC-commissioned Southern rail access to Heathrow study.</li> <li>• Discussion concerning building support for the scheme amongst stakeholders.</li> </ul>

	Surrey CC / Network Rail / Guildford BC / Woking BC / Surrey Heath BC / Elmbridge BC / Hampshire CC / other third parties	
17/11/2016	<p>Meeting</p> <p>Guildford Joint Infrastructure Group</p> <p>Guildford BC / Surrey CC / Highways England / Waverley BC / Woking BC / Network Rail / Enterprise M3 Local Enterprise Partnership</p>	<ul style="list-style-type: none"> <li>• Highways England advised that A3 Guildford tunnel technical feasibility report is to be passed to Department for Transport next week. Parties may get an update once Department for Transport has advised.</li> <li>• Highways Agency advised that Project Control Framework stage 0 study for A3 Guildford RIS scheme development is due for completion next week. Project Control Framework stage 1 study work is due to start in 2017 following Department for Transport review of A3 Guildford tunnel technical feasibility report, Department for Transport and Highways England discussions, and then a positive gateway decision to progress from Project Control Framework stage 0 to stage 1. If the study moves to stage 2, stakeholders will then be involved. Stages 2/3 need to be done by late 2018 for any schemes to be delivered starting in Road Period 2.</li> <li>• With respect to the A3 Guildford small improvement schemes, Beechcroft Drive closure feasibility study is due to finish this financial year. The other three schemes – for A3 northbound off-slip lane widening at Univerity Interchange, A3 Guildford safety enforcement cameras, and A3 southbound off-slip lane widening to A320 Stoke Interchange – are not currently funded for feasibility studies and so have not progressed further at this time.</li> <li>• Highways England is preparing Route Strategy 2 for the M25 to Solent route, with publication due in April 2017.</li> <li>• Guildford BC will set up a meeting to discuss with Highways England new information on the deliverability and funding of the proposed north facing junctions to the A3 at the A247 Clandon Road (Burnt Common) (schemes SRN9 and SRN10).</li> <li>• Updates including on submission by LEP of Growth Deal 3 bid to Government including for schemes in Guildford, preparation of Guildford Town Centre Regeneration Strategy and scheme development of Guildford West (Park Barn) railway station.</li> </ul>
17/11/2016	<p>Meeting</p> <p>M25 Junction 10/A3 Wisley Interchange improvement scheme – project briefing</p>	<ul style="list-style-type: none"> <li>• Briefing on the proposals being taken forward to non-statutory public consultation.</li> <li>• Highways England advised that the recommended scheme options in the public consultation do not deliver ‘free-flowing movement in all directions’ as required by the RIS.</li> <li>• Discussion about the potential impact of the scheme, as proposed, on Ripley village.</li> <li>• Discussion about potential benefits of schemes for north facing junctions to the A3 at the A247 Clandon Road (Burnt Common) (schemes SRN9 and SRN10), as proposed in Regulation 19 Local Plan (2016).</li> </ul>

	Highways England / Surrey CC / Guildford BC	
30/11/2016	Meeting  M25 Junction 10/A3 Wisley Interchange improvement scheme – briefing  Highways England / Surrey CC / Guildford BC	<ul style="list-style-type: none"> <li>• Briefing on the proposals being taken forward to non-statutory public consultation.</li> <li>• Discussion about the potential impact of the scheme, as proposed, on Ripley village.</li> <li>• Discussion about potential benefits of schemes for north facing junctions to the A3 at the A247 Clandon Road (Burnt Common), as proposed in Regulation 19 Local Plan (2016) as schemes SRN9 and SRN10, to the M25 Junction 10/A3 Wisley Interchange improvement scheme in respect of providing traffic relief to Ripley village.</li> </ul>
2/12/2016	Meeting  Cross Boundary Transport Impacts Meeting  Waverley BC / Surrey CC / Guildford BC / Rushmoor BC/ Hampshire CC	<ul style="list-style-type: none"> <li>• Identification of key cross boundary traffic impacts by Waverley BC/Surrey CC.</li> <li>• Waverley BC noted that funding is required for improvement schemes on the A31 at the Coxbridge roundabout, Hickley's Corner and Shepherd and Flock roundabout.</li> </ul>
2/2/2017	Meeting  Second Generation Ramp Metering  Highways England / Surrey CC / Guildford BC	<ul style="list-style-type: none"> <li>• Highways England proposal to deliver a ramp metering trial scheme on the southbound on-slip at the A3 Dennis Interchange, as part of its Collaborative Traffic Management Programme.</li> <li>• Highways England advised that ramp metering is typically operational for short periods at the shoulders of the peak periods. Such schemes are intended to improve capacity on the mainline during their operation.</li> <li>• Implementation is being planned by Highways England for summer 2017.</li> </ul>
2/2/2017	Letter	<ul style="list-style-type: none"> <li>• Response to non-statutory public consultation on the M25 junction 10/A3 Wisley interchange improvement</li> </ul>

	<p>Guildford BC to Highways England</p>	<p>scheme.</p> <ul style="list-style-type: none"> <li>• States that Guildford BC has based its Local Plan-making on the basis that the M25 junction 10/A3 Wisley interchange improvement scheme, and schemes for the A3 Guildford and M25 junctions 10-16, take place in the form described in the RIS.</li> <li>• Recognise that both shortlisted options 9 (four level free flow in two directions) and 14 (elongated roundabout) offer benefits to the performance of the Strategic Road Network.</li> <li>• Request further information to confirm that Highway England can or will balance the need to protect the Special Protection Area and Site of Special Scientific Interest against other planning considerations and can demonstrate that it is able to satisfy the requirements of the Habitats and Wild Birds Directives, specifically the three sequential tests of demonstrating no feasible alternative solutions, demonstrating Imperative Reasons of Overriding Public Interest (IROPI) and demonstrating that adequate compensatory measures will be secured.</li> <li>• Request that Highways England, in further developing a preferred scheme option, will ensure that this is consistent with the proposed site allocation for a new settlement at the former Wisley airfield, including realising opportunities to minimise the land-take for a new access road or access roads to Wisley Lane and Elm Lane.</li> <li>• Request that Highways England, in further developing a preferred scheme option, consider the proposed new north-facing junctions to the A3 at the A247 Burnt Common interchange, which could provide relief to the A3 Ockham interchange, facilitate the construction and operation of the M25 junction 10/A3 Wisley interchange improvement scheme, and mitigate adverse impacts on the Local Road Network in and around Ripley.</li> <li>• Request that Highways England prepare plans to minimise the adverse impacts of the construction of the scheme on the Local Road Network, as well as the Strategic Road Network, to limit adverse impacts including on the local economy.</li> </ul>
<p>15/2/2017</p>	<p>Meeting</p> <p>Transport Action Group of the Enterprise M3 Local Enterprise Partnership</p> <p>Enterprise M3 Local Enterprise Partnership / Hampshire CC / Surrey CC / Highways England / Guildford BC representing Surrey</p>	<ul style="list-style-type: none"> <li>• Sub-national transport body for the South East, provisionally called Transport for the South East, is being established.</li> <li>• Government made a Growth Deal 3 headline allocation of £71.12m to the Enterprise M3 LEP in February 2017.</li> <li>• Network Rail advised that schemes for Control Period 6 (2019-2024) are being considered. Guildford platform capacity scheme will not be a priority as part of this process, as it is currently only at the Initial Industry Advise (IIA) stage. Strategic Outline Business Cases are being prepared for Clapham Junction and the Woking Flyover; this will enable to operation of 2 more peak trains in advance of Crossrail 2.</li> <li>• Network Rail advised that work on the GRIP2 study for Guildford West Station is progressing well. There is local support and a strong economic case emerging. Subject to funding delivery in CP7 would be achievable.</li> <li>• Highways England advised that an indicative Road Investment Strategy (RIS) 2, covering the period 2020-2025, has been drawn up. It will be taken forward in three stages; research, decision and mobilisation. The research covers input from activities such as the M25 South-West Quadrant Study and the Roads to Growth work. Route Strategies 2 will be published in March 2017.</li> </ul>

	districts / Department for Transport / Network Rail / South West Trains / Stagecoach Bus / other parties	
24/2/2017	Email  Guildford BC to Surrey CC	<ul style="list-style-type: none"> <li>• Correspondence with Surrey CC regarding its representation to the consultation on the Regulation 19 Local Plan (2016) consultation that Policy M8 (The Guildford to Cranleigh Movement Corridor) of the existing 2003 Local Plan should continue to be safeguarded as a corridor.</li> <li>• Guildford BC noted that that footpaths and bridleways in Surrey CC's rights of way network are coincident with most of the section of the Guildford to Cranleigh Movement Corridor within Guildford borough.</li> <li>• Guildford BC also recommended that Surrey CC's ambition to maintain and improve the Guildford to Cranleigh Movement Corridor within Guildford borough would be best achieved by the use of Surrey CC's power as Local Highway Authority to make an order creating a Right of Way over that section of the route which is not part of the rights of way network, or alternatively to enter into an agreement with the landowner to create a right of way, together with the maintenance and improvement of the relevant rights of way by Surrey County Council.</li> </ul>
3/3/2017	Wessex Stakeholder Conference 2017  Network Rail / Surrey CC / Hampshire CC / Guildford BC / Waverley BC / Enterprise M3 Local Enterprise Partnership / Network Rail / other third parties	<ul style="list-style-type: none"> <li>• Network Rail gave updates on recent changes to the structure and relevant processes in Network Rail, priorities for Control Period 6 (CP6) from 2019-2024, and reviewed the challenges and key risks facing the industry in CP6 and any opportunities that can be realised.</li> <li>• Guildford platform capacity scheme was identified by Network Rail as a long term priority for funding post CP6.</li> <li>• The Department for Transport has challenged Network Rail to secure greater third part funding including section 106, CIL and from Local Enterprise Partnerships.</li> </ul>
7/3/2017	Email  Response to Mole Valley District Council Duty to Cooperate Scoping Statement	<ul style="list-style-type: none"> <li>• Transport is a strategic issue and Guildford BC welcome ongoing joint work with Mole Valley DC and Surrey CC to understand the highway impacts of proposed growth and potential mitigation measures.</li> </ul>

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	<p>Consultation</p> <p>Guildford BC to Mole Valley DC</p>	
7/3/2017	<p>Meeting</p> <p>Guildford BC / Surrey CC / Highways England update meeting - Guildford borough Proposed Submission Local Plan: strategy and sites</p> <p>Guildford BC / Surrey CC / Highways England</p>	<ul style="list-style-type: none"> <li>• Guildford BC outlined the proposed changes to the Regulation 19 Local Plan (2016) to be set out in the forthcoming targeted consultation on the Regulation 19 Local Plan (2017), including with respect to the allocations for sites A24 SARP, A25 Gosden Hill Farm, A26 Blackwell Farm.</li> <li>• Highways England indicated that they welcomed the proposed changes, as described by Guildford BC, that the through vehicular link at Blackwell Farm 'will be controlled' and to delete reference to the '30 metre strip of land' and to 'Highways England's emerging A3 Guildford scheme' with respect to the requirement relating to potential provision of all movements junction in site policy A25 Gosden Hill Farm.</li> <li>• Surrey CC advised that the requirement regarding access to Blackwell Farm in site policy A25 should not specify that either access is primary or secondary, as per Surrey CC's representation to the consultation on the Regulation 19 Local Plan (2016).</li> <li>• Guildford BC reiterated that Guildford BC/Surrey CC have promoted the schemes for north facing junctions to the A3 at the A247 Clandon Road (Burnt Common) (schemes SRN9 and SRN10) to mitigate the impact of the development traffic flows in Ripley village resulting from the development of a new settlement at the former Wisley airfield site. It was noted that Guildford BC has secured an Option Agreement for the land required for the schemes providing the north facing junctions.</li> <li>• Discussion about the elements that Highways England require further information on including relating to design of the scheme, including road safety considerations, costs, and Highways England's suggestion that Surrey CC or Guildford BC would be required to underwrite the scheme cost liability.</li> <li>• Discussion about potential benefits of the schemes to the M25 Junction 10/A3 Wisley Interchange improvement scheme in respect of providing traffic relief to Ripley village.</li> <li>• With respect to the continued inclusion of the two targeted improvement schemes for the A3 Guildford (SRN7 and SRN8) in the Plan's Infrastructure Schedule, Highways England asked for the evidence to justify this.</li> <li>• Highways England is interested in the benefits of the Sustainable Movement Corridor – West scheme (SMC1).</li> <li>• Highways England suggested that Guildford BC should identify schemes that are complementary to the A3 Guildford RIS scheme.</li> <li>• Guildford BC advised the parties that it proposed to rely on SHAR 2016 as evidence base for the targeted consultation, augmented with a supplementary document – to be prepared primarily by Guildford, and then</li> </ul>



		<p>reviewed with Surrey CC – providing commentary on the potential impact of the proposed changes in transport terms.</p> <ul style="list-style-type: none"> <li>Highways England would like evidence to be provided to identify the traffic impacts of Local Plan in interim years, so that can understand when mitigation required.</li> </ul>
10/3/2017	<p>Meeting</p> <p>Second Generation Ramp Metering</p> <p>Highways England / Guildford BC / Surrey CC</p>	<ul style="list-style-type: none"> <li>Briefing to lead councillors and senior officers regarding Highways England proposal to deliver a ramp metering trial scheme on the southbound on-slip at the A3 Dennis Interchange, as part of its Collaborative Traffic Management Programme.</li> <li>Discussion about the wider impact of the scheme on the Local Road Network.</li> <li>Highways England are planning construction in summer 2017 and implementation in September 2017 or thereabouts.</li> <li>Highways England confirmed that there would be an evaluation process.</li> </ul>
24/3/2017	<p>Meeting</p> <p>A3 Guildford Tunnel discussion</p> <p>Highways England / Department for Transport / Rt Hon Anne Milton MP / Surrey CC / Guildford BC / Enterprise M3 Local Enterprise Partnership</p>	<ul style="list-style-type: none"> <li>Highways England gave a presentation setting out findings from their tunnel study work, regarding its environmental impacts and the difficulties in constructing it. Also described its transport economics in comparison to an A3 widening scheme. Based on a 2023 forecast year, the tunnel has a 'medium' value for money, whereas the widening has a 'very high' value for money. Highways England will not provide its tunnel study work to Guildford BC or Surrey CC.</li> <li>Highways England noted that in advance of an A3 widening scheme, improvements at the Onslow and Stoke junctions will now be implemented from 2018, with a ramp metering trial at Dennis interchange will be delivered in autumn 2017.</li> <li>In terms of improvements which could support an A3 widening scheme, Department for Transport suggested that the councils put forward proposals to the Housing Infrastructure Fund, such as for improvements to the Local Road Network, new rail stations and the Sustainable Movement Corridor.</li> </ul>
29/3/2017	<p>Meeting</p> <p>Gosden Hill – Update meeting</p> <p>Martin Grant Homes / Highways England /</p>	<ul style="list-style-type: none"> <li>Martin Grant Homes and consultants gave an update on proposed development of Gosden Hill Farm.</li> <li>Discussion regarding Highways England improvement schemes on the A3 in the vicinity of Guildford in the context of the emerging Local Plan.</li> <li>Surrey CC noted that there could be an opportunity to provide a through route within the Gosden Hill Farm site to divert the B2234 to form a more direct link to the A3 at the improved junction.</li> </ul>

	Surrey CC / Guildford BC	
31/3/2017	Meeting  Guildford-Surrey Board  Guildford BC / Surrey CC / Enterprise M3 Local Enterprise Partnership / other third parties	<ul style="list-style-type: none"> <li>• progress the A3 tunnel option.</li> <li>• interested parties in the region would be convened to draft a joint letter requesting that Highways England progress the scheme development of both the widening and tunnel options through stage 1 of their Project Control Framework, not just the widening scheme.</li> </ul> <p>The Board noted that Highways England would not  Board agreed an action that a meeting between</p>
24/4/2017	Meeting  Meeting to discuss Guildford borough Draft Local Plan, proposed schemes for A3 northbound on-slip and A3 southbound off-slip at A247 Clandon Road (Burnt Common), and site policy A35 Land at former Wisley airfield  Guildford BC / Highways England / Surrey CC	<ul style="list-style-type: none"> <li>• development for proposed schemes for A3 northbound on-slip and A3 southbound off-slip at A247 Clandon Road (Burnt Common) (schemes SRN9 and SRN10), including on outline design, Option Agreement, future scheme development by WPI as promoters of former Wisley airfield site, and a recap of benefits for Draft Local Plan and potential benefits for M25 Junction 10/A3 Wisley interchange RIS scheme.</li> <li>• assessed the Guildford BC/Surrey CC-proposed schemes for A3 northbound on-slip and A3 southbound off-slip at A247 Clandon Road (Burnt Common) (schemes SRN9 and SRN10) as part of the scheme development for the M25 Junction 10/A3 Wisley interchange RIS scheme.</li> <li>• demonstrate the evidence with respect to the potential benefits of schemes SRN9 and SRN10 to the M25 Junction 10/A3 Wisley Interchange improvement scheme in respect of providing traffic relief to Ripley village.</li> </ul> <p>Guildford BC gave an update on scheme  Highways England confirmed that it has not  Highways England proposed that Guildford BC</p>
25/4/2017	Letter  Guildford BC to	<ul style="list-style-type: none"> <li>• Request that the Department for Transport: <ul style="list-style-type: none"> <li>○ provides Highways England's reports – as provided to the Department – on both the A3 widening and tunnel options to allow Guildford BC to review these,</li> </ul> </li> </ul>

	Department for Transport	<ul style="list-style-type: none"> <li>mandate Highways England to progress the development of the A3 tunnel scheme through stage 1 of the Project Control Framework, in addition to progressing the A3 widening scheme.</li> </ul>
28/4/2017	<p>Workshop</p> <p>Surrey Infrastructure Study Update – Stakeholder Workshop</p> <p>Surrey CC / Guildford BC / Highways England / other Surrey borough/district councils</p>	<ul style="list-style-type: none"> <li>Workshop-style review with Surrey borough/district councils, Highways England, the train operating companies and Network Rail, of data inputs and emerging findings from the updates to the 2016 study with. Involved review of 2016 project schedule including identifying changes to major infrastructure projects. Also review key issues and priorities for each borough/district by infrastructure type.</li> </ul>
9/5/2017 and responses received from parties as identified opposite	<p>Email</p> <p>Guildford BC to Surrey CC / Highways England / Network Rail / South West Trains / Great Western Railway / Enterprise M3 Local Enterprise Partnership / Mole Valley DC / Rushmoor BC / Waverley BC / Woking BC / Enterprise M3 Local Enterprise Partnership</p>	<ul style="list-style-type: none"> <li>Transport Strategy was provided for comment.</li> <li>Highways England, South West Trains and Great Western Railway. Where considered appropriate, the draft document was revised to address comments.</li> </ul> <p>Draft of third issue of the Guildford Borough</p> <p>Comments were received from Surrey CC,</p>
11/05/2017	<p>Letter</p> <p>Department for Transport to Guildford</p>	<ul style="list-style-type: none"> <li>Letter is in response to Guildford BC letter of 25/4/2017.</li> <li>States that indications to date are that the cost of a tunnel option would be prohibitive at between £2-£3.7 bn.</li> <li>States that reluctant to press Highways England to invest finite time and resources exploring tunnel-based solutions for the foreseeable future, or to share related material that might generate unnecessary uncertainty</li> </ul>

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	BC	and delay to the planned widening.
17/5/2017	Meeting Duty to Cooperate meeting Rushmoor BC/ Guildford BC	<ul style="list-style-type: none"> <li>Confirmed no outstanding Duty to Cooperate issues, including transport issues, but continue to remain engaged in ongoing discussions as respective Local Plans progress and to work with Surrey and Hampshire county councils as highway mitigation measures evolve through joint liaison meetings.</li> </ul>
24/5/2017	Meeting Ash Road Bridge Progress Guildford BC / Network Rail	<ul style="list-style-type: none"> <li>Meeting with Network Rail to discuss project to close level crossing and provide road bridge and footbridge [scheme LRN21].</li> </ul>
12/6/2017	Meeting Guildford platform capacity study steering group Guildford BC / Network Rail / Department for Transport / Department for Business, Energy and Industrial Strategy / Enterprise M3 Local Enterprise Partnership / Surrey CC	<ul style="list-style-type: none"> <li>Discussions have identified need for a GRIP0 Station Capacity Assessment and subsequent Development Brief for surplus land.</li> <li>Guildford BC will commission and fund this study.</li> <li>Linkages with other transport infrastructure schemes were discussed.</li> <li>Agreed that task and finish working group will be set up between Guildford BC and Network Rail to take forward the study. Steering group to meet again in about six months.</li> </ul>
19/6/2017	Meeting	<ul style="list-style-type: none"> <li>Department for Transport gave update on M25 South West Quadrant Strategic Study Stage 3 Report (March</li> </ul>

	<p>Guildford Joint Infrastructure Group</p> <p>Guildford BC / Surrey CC / Waverley BC / Woking BC / Enterprise M3 Local Enterprise Partnership / Department for Transport</p>	<p>2017) published and next steps.</p> <ul style="list-style-type: none"> <li>• Highways England’s written update <ul style="list-style-type: none"> <li>○ Findings from M25 to Solent Route Strategy (March 2017), as well as other research, will inform the first Strategic Road Network Initial Report to be published later this year. This will form the basis of a public consultation, which in turn will feed into decision-making on the next Road Investment Strategy (RIS2). The detail of how funding will be allocated will be in the RIS2 document due to be published in 2019.</li> <li>○ A3 Guildford RIS scheme development: Project Control Framework stage 0 is complete. Timing for commencement of Project Control Framework stage 1 not identified.</li> <li>○ M25 Junction 10/A3 Wisley interchange RIS scheme: The project is progressing to a Preferred Route Announcement later this year followed by the statutory public consultation. Start of works 2020 and open to traffic in 2022.</li> <li>○ A3 northbound off-slip lane widening at University Interchange: Anticipated timescale for start of construction- Spring 2019, expected to be open for traffic Spring 2019. Currently going through Feasibility/Detailed design.</li> <li>○ A3 southbound off-slip lane widening at Stoke Interchange: Awaiting feasibility Scheme Appraisal Report sign off. Detailed design will follow. Anticipated timescale for start of construction- Spring 2019, expected to be open for traffic Spring 2019.</li> <li>○ A3 ramp metering second generation at Dennis Interchange: Indicative timescale for delivery is January 2018.</li> <li>○ Beechcroft Drive: Funding has been secured for detailed design. Awaiting sign off of the feasibility Scheme Appraisal Report before detailed design can commence this financial year.</li> <li>○ A3 speed enforcement cameras: Anticipated timescale for completion is financial year 2018/19.</li> </ul> </li> <li>• Written update from Network Rail: <ul style="list-style-type: none"> <li>○ Guildford Main Line Station – Platform 0: Network Rail has completed the Pre-GRIP study that was undertaken to provide some high-level options for possible alignments.</li> <li>○ Guildford Main Line Station – Guildford Platform Capacity Study: The inaugural steering group meeting took place in Guildford on 12/5/2017.</li> <li>○ Replacement of Compton Road Bridge: Intention is to replace bridge ‘like-for-like’ in 2018/19.</li> <li>○ Guildford West: GRIP 2 study has been provided to Network Rail for review.</li> <li>○ New Community Rail Partnership for North Downs Line being set up for line between Guildford and Gatwick. Will be managed by Sussex Community Rail Partnership. Meetings being set up with Surrey CC and Guildford BC to progress.</li> </ul> </li> <li>• Updates on studies and schemes in development including bus study, scheme development of road safety scheme for Onslow Street/Bridge Street and Sustainable Movement Corridor.</li> <li>• Updates on funded schemes including Guildford Town Centre Transport Package and Tunsgate public realm</li> </ul>
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		<p>scheme</p> <ul style="list-style-type: none"> <li>Local Growth Fund 3 bidding for schemes in Guildford borough.</li> <li>Local Plan-making activity in Guildford borough, Waverley borough and Woking borough.</li> </ul>
20/6/2017	<p>Meeting</p> <p>New Guildford strategic highway assessment</p> <p>Guildford BC / Surrey CC</p>	<ul style="list-style-type: none"> <li>Status and availability of Sintram 7 model.</li> <li>Potential scenarios for testing.</li> <li>Arrangements for providing planning datasheets.</li> <li>Study programme.</li> </ul>
22/6/2017	<p>Meeting</p> <p>Transport Action Group of the Enterprise M3 Local Enterprise Partnership</p> <p>Enterprise M3 Local Enterprise Partnership / Hampshire CC / Surrey CC / Highways England / Guildford BC representing Surrey districts / Basingstoke &amp; Deane representing Hampshire districts / Department for Transport / Network Rail / South West Trains / Stagecoach Bus / other parties</p>	<ul style="list-style-type: none"> <li>Inaugural meeting of the Shadow Board of Transport for the South East, the sub-national transport body, is on 22/6/2017 and will be considering the constitution and governance of the new organisation, together with how to develop a transport strategy for the area and identification of major highways infrastructure priorities to feed into Highways England's RIS 2 process. LEPs will co-opted on the new body. Transport forum is recommended to be established.</li> <li>LEP has agreed a provisional allocation of the additional £71.12m secured through the Local Growth Fund 3 process. Major packages focused on the Blackwater Valley and Guildford have secured significant funding. The LEP Board also agreed an allocation of further sustainable transport funding. All the schemes will be subject to development of a business case and consideration by the LEP.</li> <li>Surrey CC is considering submitting a bid for Hickley's Corner Improvement Scheme to the National Productivity Investment Fund for the Local Road Network.</li> <li>Highways England advised that the M25 to Solent Route Strategy 2 was published in March 2017. This will be used to inform the Strategic Road Network Initial Report, which will be published later in the year. This will form the basis of a public consultation which will also feed into Road Investment Strategy (RIS) 2. The draft Road Investment Strategy (RIS) 2, covering the period 2020-2025 continues to be developed.</li> <li>Highways England advised that whilst funding is in place for Project Control Framework stage 1 scheme development of A3 Guildford RIS scheme, start date is uncertain as resources are not available.</li> <li>M3 Junction 2-4A Smart Motorway is on schedule for completion at the end of June.</li> <li>Network Rail advised that the Strategic Outline Business Case is being worked up for Woking Flyover and Station scheme. Crossrail 2 submitted its Strategic Outline Business Case to Government in March but has not yet been approved and there are concerns the scheme may be delayed.</li> <li>First Group/MTR (trading as South Western Railway) has won the competition for the South Western franchise</li> </ul>

		<p>and will take it over from 3/7/2017.</p> <ul style="list-style-type: none"> <li>• Stagecoach Bus advised that discussions are taking place about the development of Guildford Bus Station.</li> </ul>
10/7/2017	<p>Event</p> <p>Planning future investment in England's Strategic Roads</p> <p>Highways England / Department for Transport / Guildford BC / Surrey CC / other third parties</p>	<ul style="list-style-type: none"> <li>• Presentations on Highways England processes of scheme development and delivery.</li> <li>• Presentations on Department for Transport's Road Investment Strategy 2 process.</li> <li>• Also presentations from Office of Rail and Road and Transport Focus on their roles with respect to the Strategic Road Network and its improvement.</li> </ul>
11/7/2017	<p>Workshop</p> <p>M25 Junction 10 Highways England – Surrey CC – Atkins Liaison Meeting</p> <p>Surrey CC / Highways England and consultant / Guildford BC</p>	<ul style="list-style-type: none"> <li>• Technical workshop to understand and discuss Highways England's proposals for M25 Junction 10/A3 Wisley Interchange scheme and discuss the interaction of this proposed scheme with the Local Road Network and associated junctions in particular around the Painshill junction.</li> </ul>
18/7/2017	<p>Meeting</p> <p>Guildford BC meeting with Highways England re M25 Junction 10/A3 Wisley Interchange scheme</p>	<ul style="list-style-type: none"> <li>• Briefing on progress with scheme development, key findings from non-statutory public consultation, scheduled Preferred Route Announcement in late August 2017, with public consultation from December 2017 and with works on site in 2019/20 financial year.</li> <li>• Highways England reiterated its consistent advice that it cannot take into account the potential development of the former Wisley airfield site or the rejected planning application which is subject to a forthcoming planning inquiry.</li> <li>• Discussion about proposed changes to side roads, including Wisley Lane.</li> </ul>

	Highways England / Guildford BC / Surrey CC	
2/8/2017	Meeting  Guildford platform capacity study scoping meeting  Guildford BC / Network Rail	<ul style="list-style-type: none"> <li>• Brief for study</li> <li>• Study scope to include consideration of wider benefits to station area and customer experience.</li> </ul>
5/9/2017	Meeting  Gosden Hill, Guildford  Surrey CC / Guildford BC / Martin Grant Homes	<ul style="list-style-type: none"> <li>• Discussion regarding revised access junction to A3, evidence regarding impact on A3100 corridor and potential mitigation on A3100 within Burpham, and the opportunity to provide a through route within the Gosden Hill Farm site to divert the B2234 to form a more direct link to the A3 at the improved junction.</li> <li>• Also discussed proposed Guildford East (Merrow) railway station, Gosden Hill Farm Park and Ride, Sustainable Movement Corridor and transport evidence base.</li> </ul>
12/9/2017	Meeting  Blackwell Farm meeting re transport major issues  Guildford BC / Surrey CC / University of Surrey	<ul style="list-style-type: none"> <li>• Discussion regarding the new signalised junction from Blackwell Farm site to A31 Farnham Road and the control of through vehicular link on the Blackwell Farm site.</li> </ul>
27/9/2017	Meeting  A3 Guildford University Interchange NB Exit	<ul style="list-style-type: none"> <li>• Appraise all parties on the background to and progress with Highways England's scheme development for Beechcroft Drive new access/road safety scheme [ASP10], A3 northbound off-slip widening at University Interchange (approaching Tesco roundabout) improvement scheme [SRN7], and A3 southbound off-slip lane widening to A320 Stoke Interchange improvement scheme [SRN8].</li> </ul>



	<p>slip – Meeting</p> <p>Highways England / Surrey CC / Guildford BC / University of Surrey</p>	<ul style="list-style-type: none"> <li>• Identification of land ownership issues affecting how the schemes will be delivered.</li> <li>• Discussion regarding the parties best suited to deliver the schemes.</li> <li>• Discussion of funding and key dates for delivery of the schemes.</li> <li>• Scheme ASP10 now has funding in place for detailed design and construction, although the costs of the scheme are subject to change. Cost and responsibility for maintenance liability to be considered further.</li> <li>• Further work to take place to coordinate scheme SRN7 with elements of scheme SMC1 being promoted by Surrey CC/Guildford BC.</li> <li>• Further work to take place to coordinate scheme SRN8 with A25 Stoke crossroad improvement scheme (a component scheme of LRN1) which is being promoted by Surrey CC/Guildford BC.</li> </ul>
21/9/2017	<p>Letter</p> <p>Guildford BC to Mayor of London</p>	<ul style="list-style-type: none"> <li>• Letter responding to Draft London Mayor's Transport Strategy 2017 consultation.</li> <li>• Guildford BC supports the vision and objectives of the Draft Mayor's Transport Strategy 2017.</li> <li>• Guildford BC is supportive of Policy 16 which makes a commitment for TfL to support public transport to enhance travel between London and the rest of the UK and is ready to engage with the Mayor and TfL on this corridor, which has been identified as an initial priority for investment.</li> <li>• Guildford BC supportive of proposal 70, focused on realisation of “associated and economic and housing growth potential” but with the caveat that in preparing the Draft Local Plan it has been established that Guildford borough is not able to contribute towards meeting unmet needs in the housing market area in the plan period up to 2027. Guildford BC support the representation from the Surrey Planning Officers Association (SPOA) that Proposal 70 and related supporting text needs to be changed to remove any suggestion that these strategic corridors for infrastructure investment are possible growth corridors for unmet housing need in London.</li> </ul>
5/10/2017	<p>Meeting</p> <p>A3 assessment study - inception meeting</p> <p>Guildford BC and consultant / Surrey CC</p>	<ul style="list-style-type: none"> <li>• Discussion of approach and methodology, data sources and study programme.</li> </ul>
10/10/2017	<p>Meeting</p> <p>Transport Action Group of the Enterprise M3 Local</p>	<ul style="list-style-type: none"> <li>• South Western Railway timetable consultation.</li> <li>• Scheme delivery update on the Guildford Town Centre Transport Package.</li> <li>• Housing Infrastructure Fund and future scheme development.</li> <li>• Preparation of new Enterprise M3 LEP Strategic Economic Plan.</li> </ul>

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	<p>Enterprise Partnership</p> <p>Enterprise M3 Local Enterprise Partnership / Hampshire CC / Surrey CC / Highways England / Guildford BC representing Surrey districts / Basingstoke &amp; Deane representing Hampshire districts / Department for Transport / Network Rail / South West Trains / Stagecoach Bus / other parties</p>	
13/10/17	<p>Meeting</p> <p>M25 J10/A3 Wisley interchange RIS scheme – Statement of Community Consultation drafting session</p> <p>Highways England / Guildford BC / Surrey CC</p>	<ul style="list-style-type: none"> <li>Meeting for Highways England to obtain feedback on a draft Statement of Community Consultation and approach for the M25 J10/A3 Wisley interchange RIS scheme.</li> </ul>
18/10/2017	<p>Email</p> <p>Guildford BC response to Waverley BC Consultation on Main</p>	<ul style="list-style-type: none"> <li>Noted that Waverley BC has not updated the Strategic Highways Assessment modelling and associated mitigation measures with respect to additional development proposed in Waverley borough.</li> <li>Stated that Guildford BC would expect appropriate transport, including highways, mitigation to be identified and realised through the planning process and for Guildford BC and the highway authorities to be engaged at an early stage on applications that could have an impact on the highway networks in Guildford borough.</li> </ul>

	<p>Modifications to the Pre-Submission Local Plan Part 1: Strategic Policies and Sites</p> <p>Guildford BC to Waverley BC</p>	<ul style="list-style-type: none"> <li>• Guildford BC support proposed changes to policies ST1 and SS7.</li> </ul>
18/10/2017	<p>Email</p> <p>Guildford BC to Highways England</p>	<ul style="list-style-type: none"> <li>• Email with brief for the study of performance of A3 trunk road interchanges in Guildford urban area to 2024 under development scenarios.</li> <li>• States that proposed methodology is based on that agreed with the then Highways Agency in 2014, but now modified to assess the impact of proposed planned development in the period to 2024, the earliest date for the start of construction of the A3 Guildford RIS scheme.</li> </ul>
19/10/2017	<p>Meeting</p> <p>Highways England's position on Regulation 19 Local Plan (2017) at close of planning appeal for former Wisley airfield site</p> <p>Guildford BC / Highways England</p>	<ul style="list-style-type: none"> <li>• Meeting to understand Highways England's position on Regulation 19 Local Plan (2017) as a result of Highways England's position at planning appeal for former Wisley airfield site.</li> </ul>
23/10/2017	<p>Meeting</p> <p>Guildford Borough Council and Highways England Local Plan meeting</p> <p>Guildford BC / Highways England</p>	<ul style="list-style-type: none"> <li>• Meeting called by Guildford BC to clarify Highways England's position on Regulation 19 Local Plan (2017) following close of planning appeal for former Wisley airfield site.</li> <li>• Discussed process for preparation of Statement of Common Ground and Guildford BC presented a first draft version for Highways England to comment upon.</li> <li>• Highways England gave initial, informal verbal comments on the first draft version of a Statement of Common Ground.</li> </ul>
27/10/2017	<p>Email</p>	<ul style="list-style-type: none"> <li>• Response to Guildford BC 18/10/2017 email with brief for the study of performance of A3 trunk road</li> </ul>

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	Highways England to Guildford BC	<p>interchanges in Guildford urban area to 2024 under development scenarios.</p> <ul style="list-style-type: none"> <li>• States that the study is essential element of transport evidence base.</li> <li>• Various questions asked.</li> </ul>
1/11/2017	<p>Meeting</p> <p>Guildford Joint Infrastructure Group</p> <p>Guildford BC / Surrey CC / Highways England / Woking BC / Network Rail / Enterprise M3 Local Enterprise Partnership / Department for Transport</p>	<ul style="list-style-type: none"> <li>• Highways England advised that A3 Guildford RIS scheme will undergo an Independent Assurance Review involving stakeholders in December 2017. Preferred Route Announcement for M25 Junction 10/A3 Wisley interchange RIS scheme by end 2017.</li> <li>• Surrey CC proposes to install two speed tables as a road safety scheme at the Onslow Street/Bridge Street junction. Construction anticipated to take place in 2017. Funding to be identified.</li> <li>• Surrey CC/Guildford BC consultation on proposals for elements of SMC1 in September–October 2017.</li> <li>• Update on the delivery of Walnut Bridge, the experimental closure of Walnut Tree Close and the Millbrook car park junction improvement scheme elements of Guildford Town Centre Transport Package.</li> </ul>
6/11/2017	<p>Meeting</p> <p>A3 Guildford Meetings – Beechcroft – Stoke Interchange – University off-slip</p> <p>Highways England / Surrey CC / Guildford BC / University of Surrey</p>	<ul style="list-style-type: none"> <li>• Appraise all parties on the progress with Highways England's scheme development for Beechcroft Drive new access/road safety scheme [ASP10], A3 northbound off-slip widening at University Interchange (approaching Tesco roundabout) improvement scheme [SRN7], and A3 southbound off-slip lane widening to A320 Stoke Interchange improvement scheme [SRN8].</li> </ul>
13/11/2017	<p>Meeting</p> <p>Gosden Hill – Highways meeting</p>	<ul style="list-style-type: none"> <li>• Discussion regarding the opportunity to provide a through route within the Gosden Hill Farm site to divert the B2234 to form a more direct link to the A3 at the improved junction, Guildford East (Marrow) railway station and transport evidence base.</li> </ul>

	Guildford BC / Surrey CC / Martin Grant Homes	
13/11/2017	<p>Workshop</p> <p>Development Consent Order (DCO) Knowledge Sharing Event for Local Authorities</p> <p>Highways England / Guildford BC / Surrey CC / Elmbridge BC and other local authorities</p>	<ul style="list-style-type: none"> <li>• Workshop called by Highways England, in the context of the number of DCO applications that Highways England is proposing to submit in the region, including the M25 J10/A3 Wisley interchange RIS scheme, to learn from local authorities with experience of a DCO process about the process, inputs required and resourcing.</li> <li>• Highways England's Preferred Route Announcement for the M25 J10/A3 Wisley interchange scheme scheduled for 29/11/2017.</li> </ul>
24/11/2017	<p>Meeting</p> <p>Guildford borough Local Plan: strategy and sites</p> <p>Guildford BC / Highways England</p>	<ul style="list-style-type: none"> <li>• Discussed Highways England's comments on specification for the study of performance of A3 trunk road interchanges in Guildford urban area to 2024 under development scenarios.</li> <li>• Discussed a second draft version of a Statement of Common Ground prepared by Guildford BC which was tabled at the meeting.</li> <li>• Highways England to provide written comments on the second draft version of a Statement of Common Ground.</li> </ul>
6/12/2017	<p>Meeting</p> <p>A3 Guildford RIS scheme – Independent Assurance Review</p> <p>Highways England / Guildford BC</p>	<ul style="list-style-type: none"> <li>• The purpose of an Independent Assurance Review is to examine that in principle, a project – in this case the A3 Guildford RIS scheme – continues to meet its business need, is affordable, achievable with appropriate options explored and likely to achieve value for money. Guildford BC attended an interview with the reviewers undertaking the review for Highways England.</li> </ul>

## Appendix 8: Audit trail of ongoing cooperation - Travellers

Date	Partners engaged <i>Meeting/email/ telephone conversation</i>	Cross boundary issues discussed and any outcomes <i>Outcomes reached that affect GBC and other bodies</i>
04/2012	Surrey boroughs	Agreed a traveller accommodation assessment (TAA) methodology for Surrey
26/4/12	Woking	Guildford and Woking jointly commissioned interviews with traveller communities and interpreted the data separately in individual TAA's (para 2.8)
12/9/12	Elmbridge, Mole Valley, Rushmoor, Surrey Heath, Waverly and Woking	Email sent to neighbouring authorities as part of the TAA. Results then summarised and include in GBC TAA.
27/3/14	Spelthorne	Response to DtC scoping statement "we share a common Surrey-wide methodology which our Traveller Accommodation Assessment (2012) has been prepared in accordance with. Whilst meeting traveller need is a strategic issue we envisage meeting our own traveller need within our borough."
30/4/15	Reigate and Banstead	Responded to email regarding our current progress on traveller needs assessment
3/6/15	Surrey Traveller TAA methodology review group	Discuss whether joint TAA methodology is fit for purpose. Each authority agreed to review the ORS publication and see whether the 3% family formation rate needed to be reviewed. Agreed the existing methodology has the buy-in from G&T groups which may be hard to form again.
28/4/15	Reigate and Banstead	Commented we envisage meeting our own traveller need within the borough
28/4/15	Runnymede	Commented we envisage meeting our own traveller need within the borough
17/7/15	Rushmoor Local Plan Consultation	Concerned that the Plan didn't necessarily think the provision of the needed traveller pitch would be located within the borough. This is against the PPTS 2012 which does not suggest that single pitches are inappropriate. A regulation 19 consultation should identify specific sites and should plan for need in 6-10/11-15 years.
23/9/15	Tandridge	Response to letter from Tandridge asking whether we could meet some of their need. Declined the request and clarified the level of work that we consider should be undertaken in attempting to meet

		Traveller need. This includes insetting of Green Belt sites and looking at Council-owned land.
4/6/15	West Surrey Local Plan Group	Discussion around whether work on TAA should be put on hold until a definition of travellers has been confirmed by CLG. Decided work should not be delayed ahead of this as can have implications for examination of LP.
21/10/15	Woking and Waverley	Agreed need a methodology to assess needs. Each local authority to meet gypsy, traveller and travelling showpeople needs arising in their administrative area.
9/2/16	Surrey Bright Futures Sub Group- Traveller Accommodation (SCC, Mole Valley, Rushmoor).	Tackling deficiencies in Traveller accommodation across Surrey. Possible use of a consultant for the National Federation of Gypsy Groups to consider the new TAA methodology being prepared by three surrey authorities, look at questionnaires for TAAs, and support LA's at examination, where attempts are being made to meet need appropriately. Also look at Surrey TAAs and add up need and provision. SCC public sites in need of regeneration.
5/4/16	Runnymede Local Plan	Confirmation that Guildford does not have any available or deliverable land that would be suitable for sites for travellers currently residing within Runnymede. In order to meet our traveller accommodation need we have used the call for sites process and proactively explored all opportunities which includes taking temporary permissions out of the Green Belt and looking at some of our larger site allocations to bring forward an element of traveller provision. We have brought forward sites on our own land where possible. Given the high need that exists within Surrey we would expect that all councils seek to maximise opportunities to meet their own need, and be able to robustly justify any shortfall in provision.
7/4/16	Response to Elmbridge TAA	Responded to Elmbridge's initial scope for cross boundary issues that will need to be considered when allocating new pitches and plots.
14/6/16	Rushmoor	Agreed there are currently no strategic issues regarding travellers
8/7/16	Planning Working Group	Feedback from the Gypsy and Traveller sub group meeting on 28 <sup>th</sup> June. This is a group for Surrey authorities that meets to discuss TAAs, and future updates given the joint surrey methodology.
21/7/16	Reigate and Banstead GTAA	Expressed our disappointment at low response rate to interviews which may result in a danger of under planning and leading to a large unmet need across Surrey. Where there have been 7 unknown households who were not interviewed, we suggested estimating the need so as not to under supply. Concerned that not all opportunities have been used to try and meet own need and explore all possible site options.
17/8/16	Runnymede I&O	Support the method of seeking to meet traveller needs using existing sites and also using resultant land parcels from a GB review. Emphasised traveller accommodation provision on large sites can be part of

		an inclusive and mixed community. Suggest adding wording regarding transit sites and if there is a need, Surrey LPA will work together to find a suitable location for this.
27/09/16	Waverley and Woking	Discussed the approaches likely to be adopted by the authorities to assessing Traveller Accommodation needs given the revised PPTS definition of 'Travellers' and the new methodologies adopted elsewhere in Surrey.
3/10/16	Reigate and Banstead	Responded to Reigate and Banstead Regulation 18 Development Management Plan consultation specifically on the issue of travellers; expressed reservations about the low response rate to the GTAA interviews and the resultant impact on the findings. Concerned that figures may not reflect the true level of need for traveller accommodation and there is a danger of under planning, resulting in a large unmet need across Surrey. Given the high level of traveller accommodation need that exists within Surrey we consider that all councils should maximise opportunities to meet their own need by identifying suitable and deliverable traveller sites.
03/10/16	Waverley: response to pre-submission Local Plan	<p>We note that there is a relatively large and long-standing gypsy and traveller community in Waverley, similar to Guildford borough. Due to the pressing need for Traveller pitches, and the Council's commitment to supporting all sections of the local community, our draft Local Plan identifies sufficient sites to meet the need for Traveller accommodation, with an appropriate buffer to ensure flexibility (as discussed). We note that Waverley is equally committed to assessing the accommodation needs of the Traveller community and are updating their TAA, and that sites will be allocated in Local Plan part 2 to meet the identified need. The provision of Traveller accommodation is a cross boundary issue, and we wish to continue to work closely with Waverley to ensure that needs are assessed and planned for though the plan making process.</p> <p>We consider that a key mechanism for future provision is inclusion of Traveller accommodation on strategic development sites. We believe there is an opportunity for such provision at the proposed site allocation at Dunsfold Aerodrome, and would encourage proportionate provision of Traveller accommodation on this site to help achieve sustainable and mixed communities. We also consider that Traveller accommodation can be provided by rural exception policy (PPTS policy D), and would recommend this is recognised in policy AHN2.</p> <p>As a Green Belt review has been done to identify land for bricks and mortar housing given that needs cannot be accommodated sustainably on non-Green Belt land it could be considered discriminatory to not consider whether appropriate amendments to Green Belt boundaries can be made to meet the need for</p>



		Traveller accommodation.
12/10/16	Mole Valley	Met with planning officer colleagues to discuss approach towards assessing travellers accommodation need and providing suitable sites in light of recent legislation. Productive information sharing session.
13/12/16	All Surrey Authorities	Email sent to all Surrey LAs on draft TAA questionnaire to be used for updated GBC Traveller Accommodation Assessment.
24/1/17	Elmbridge	<p>Consultation on draft Elmbridge GTAA 2016. Disappointed in the very low response which has a knock on effect to the findings and may not reflect the true level of need for traveller accommodation in Elmbridge borough. With such low response rates and numbers, there is a danger that you will under plan, resulting in a large unmet need across Surrey.</p> <p>We are concerned that not including a figure for unknown households not interviewed could result in underestimating the need for traveller accommodation, particularly as some of those not interviewed are based on temporary or unauthorised sites and are therefore more likely to travel and meet the new definition of traveller.</p> <p>We note that the previous GTAA identified a need for 36 pitches compared to the 2 pitches identified in this GTAA. This difference could potentially indicate an underestimation of need; we are also concerned that this does not seem to reflect the high levels of encampment mentioned in the TAA.</p>
2/2/17	Surrey Heath	Responded to DTC scoping – strategic issues but consider should meet own needs. Welcome further joint working on transit sites
7/03/17	Mole Valley	Responded to the DTC scoping statement- identified potential for further work regarding possible transit sites.
11/4/17	Surrey Heath and Waverley	Responded to consultation on draft TAA's for Surrey Heath and Waverley.
17/05/17	Rushmoor	Duty to cooperate meeting: Confirmed no outstanding Duty to Cooperate issues, but continue to remain engaged in ongoing discussions as respective Local Plans progress.
18/05/17	All Surrey authorities	Email sent to all Surrey local authorities on GBC draft TAA inviting comments as part of our commitment to engage neighbouring authorities and other bodies on an active and on-going basis on issues of a cross-boundary nature.
13/06/17	Elmbridge	On 30/5/17 Elmbridge, in response to the draft TAA, also raised a question on site waiting list and applicants travelling status to ensure consistency with Elmbridge's site waiting list which is held and managed by Surrey County Council and query over surplus sites. Clarified the GB Council do not

		<p>currently ask for details of travelling status when people request to go on the Site Waiting List, and travelling status does not at present carry any weight when allocating public pitches. Within the emerging Local Plan we have identified sufficient permanent pitches and plots to meet the needs of local Gypsies, Travellers and Travelling Showpeople who meet the definition of a traveller set out in Planning Policy for Traveller Sites and we also seek to meet the needs of travellers within our area who do not meet the planning definition, and also make provision for permanent pitches to meet potential additional need of local households of unknown traveller planning status. We have built in flexibility to meet any future arising needs through the requirement to provide pitches or plots on development sites of over 500 homes whilst there remains an identified need. However it is worth noting that not all the homes within strategic development sites will be delivered within the Local Plan period, therefore not triggering the thresholds requiring the provision of pitches or plots if a need for them remains. For these reasons we do not consider that the level of sites identified is, in reality, much greater than needed and there is therefore no surplus that could be considered to meet any unmet needs arising from elsewhere.</p>
25/10/17	Waverley	<p>The Guildford borough TAA June 2017 assesses the need for traveller accommodation and we have allocated sites within our Proposed Submission Local Plan to meet the identified need for 4 pitches and 4 plots, as defined by PPTS. We also seek to meet the need of travellers who fall outside the planning definition by making provision for 41 pitches and 4 plots plus 8 pitches for households of unknown traveller planning status.</p> <p>We consider that a key mechanism for future provision is inclusion of Traveller accommodation on strategic development sites, and there is an opportunity for such provision within Waverley on the proposed site allocation at Dunsfold Aerodrome. We also consider that Traveller accommodation can be provided by rural exception policy (PPTS policy D), and as a Green Belt review has been done to identify land for bricks and mortar housing it is also appropriate and fair to consider whether amendments to Green Belt boundaries can be made to meet the need for Traveller accommodation. We have built in flexibility to meet any future arising needs through the requirement in the Proposed Submission Local Plan to provide pitches or plots on development sites of over 500 homes <u>whilst there remains an identified need</u>. For these reasons we do not consider that there is a surplus of sites that could be considered to meet any unmet traveller accommodation needs arising from elsewhere. The provision of Traveller accommodation is a cross boundary issue, and we wish to continue to work closely with Waverley to ensure that needs are assessed and planned for though the plan making process. However, the significant difference between Guildford and Waverley Borough Councils timescales for site allocation</p>

		<p>work limit opportunity for joint-working on site allocations at present; we plan to submit the Guildford borough Proposed Submission Local Plan Strategy and Sites this December.</p> <p>The Guildford borough TAA found no evidence of need or demand for a transit site within our borough.</p>
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## **Appendix 9: West Surrey Memorandum of Understanding**

### **Introduction and basis for the Memorandum of Understanding**

The Localism Act 2011 and the National Planning Policy Framework (NPPF) make it a requirement under the Duty to Cooperate for local authorities to engage constructively, actively and on an on-going basis in the preparation of development plan documents and other local development documents. This is a test that local authorities need to satisfy at an Examination to get a sound development plan document. The Duty to Cooperate applies to strategic planning issues of cross boundary significance. Woking Borough Council, Waverley Borough Council and Guildford Borough Council are all at various stages of preparing their Local Development Documents. However, they all have common strategic housing issues that they should work together to address.

The Government places much emphasis on housing delivery as a means for ensuring economic growth and addressing the current national shortage of housing. Consequently, the Planning Inspectorate is critical at Local Plan Examinations to ensure that local authorities are exploring all possible means to meet the objectively assessed housing need in their housing market area. Paragraph 47 of NPPF is very clear to emphasise that 'local planning authorities should use their evidence base to ensure that their local plan meets the full, objectively assessed needs for market and affordable housing in the housing market area...'.

Where strategic planning matters are concerned, the requirements of the Duty to Cooperate are not a choice but a legal obligation.

### **Memorandum of Understanding**

The memorandum of understanding sets out a framework for partnership working between Woking Borough Council, Waverley Borough Council and Guildford Borough Council to carry out a Strategic Housing Market Assessment for the West Surrey Housing Market Area. The three authorities have agreed that their combined geographical area should form the West Surrey Housing Market Area for the purposes of identifying and meeting objectively assessed housing need for the area in accordance with the requirements of the National Planning Policy Framework.

The three authorities will jointly work together to commission consultants to carry out the Strategic Housing Market Assessment (SHMA) to determine the objectively assessed housing need for the West Surrey Housing Market Area. The cost for carrying out the SHMA will be shared equally between the three authorities. It is expected that this particular study will be carried out by June 2014 to provide the baseline data for quantifying housing need in the Housing Market Area. The three authorities have agreed to subsequently review the SHMA every three years to bring it up to date. The cost of reviewing the SHMA will also be shared equally between the three authorities. All relevant information pertinent to the successful completion and subsequent reviews of the study will be shared amongst the three authorities.

A brief setting out the requirements, terms and conditions of the study will be agreed by the three authorities before the study is commissioned. The three authorities will work jointly and mutually to monitor and manage the preparation of the study to its completion and sign off. The three authorities will continue to work together to seek to rationalise the timing for the review of their local plans. When this is achieved, the timing for the review of the SHMA will be re-aligned with the review of the local plans.

### **Other strategic planning issues**

The three authorities have acknowledged that there are other strategic planning matters that they could work in partnership to address. Paragraph 178 of the NPPF stresses that public bodies have a duty to cooperate on planning issues that cross administrative boundaries such as

- jobs;
- provision of retail, leisure and other commercial uses;
- provision of infrastructure for transport, telecommunication, waste management;
- water supply, flood risk and green infrastructure etc;
- employment;
- the provision of health, security, community and cultural infrastructure; and
- climate change mitigation and adaptation.

Where relevant and on a case by case basis, the three authorities will work together to address these matters if it is considered beneficial to do so.

### **Working arrangements**

For the duration of the preparation of the SHMA, the three authorities will endeavour to meet once a month to review progress of the study and the use of its recommendations. Thereafter, they will meet quarterly to review progress on the preparation of their local development documents and identify any strategic matters that they can jointly work to address.

### **Limitations**

The three local authorities are fully aware that the Duty to Cooperate does not always result in agreement. In this regard, the Memorandum of Understanding will not restrict the discretion of any of the authorities in the exercise of its statutory functions and powers, or in its response to consultation or determining planning applications. In this regard, it is not intended that this document is legally binding.

## **Signatories**

Head of Planning Services (Jeni Jackson) – Woking Borough Council - Date

Head of Planning Services (Carol Humphrey) – Guildford Borough Council – Date

Head of Planning Services (Matthew Evans) – Waverley Borough Council - Date

# Appendix 10: West Surrey Statement of Common Ground

## HOUSING DELIVERY WITHIN THE WEST SURREY HOUSING MARKET AREA

### Purpose

To demonstrate the commitment by Guildford, Waverley and Woking Borough Councils to work together on an ongoing basis to identify and address strategic cross boundary issues with implications for plan making. In particular, to strive to meet the objectively assessed housing need within the West Surrey Housing Market Area (HMA).

### Context

The Localism Act 2011 and the National Planning Policy Framework (NPPF) make it a requirement under the Duty to Cooperate for local authorities to engage constructively, actively and on an ongoing basis in the preparation of development plan documents and other local development documents. This is a test that local authorities need to satisfy at an Examination in order to achieve a sound development plan document. The Duty to Cooperate applies to strategic planning issues of cross boundary significance.

The National Planning Policy Framework (NPPF) requires that local planning authorities use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with policies in the NPPF.

Woking, Waverley and Guildford Borough Councils have signed a Memorandum of Understanding (MoU) to work together to address strategic planning issues in the West Surrey area. The West Surrey Housing Market Area (HMA) comprises the districts of Guildford, Waverley and Woking. In the context of the above MoU, the local authorities jointly commissioned GL Hearn to prepare a Strategic Housing Market Assessment (SHMA) for the HMA. The latest and final version of the West Surrey SHMA was published in September 2015. This identifies the full objectively assessed need for the period 2013 to 2033 as follows:

- Guildford: 693 homes per annum
- Waverley: 519 homes per annum
- Woking: 517 homes per annum
- **Total for the HMA: 1,729 homes per annum**

In March 2017, Guildford Borough Council published the West Surrey SHMA: Guildford Addendum. This sits alongside and supplements the West Surrey SHMA (2015). It provides a factual update with the latest household and economic projections. The methodology used in the Guildford Addendum is consistent with that used in the West Surrey SHMA and does not in any way undermine the findings of the West Surrey SHMA (2015).

As part of the examination process into Waverley Borough Council's Local Plan Part 1: Strategic Policies and Sites, the inspector's preliminary conclusion is that the OAN

for Waverley Borough should be revised. This takes account of the latest household projections and includes a greater uplift for affordability and an allowance for London Migration.

The Inspector in the Examination of the Waverley Borough Local Plan Part 1 also reached a preliminary conclusion that Waverley should accommodate 50% of the unmet housing need arising in Woking. This, together with the adjustment to the Waverley OAN results in the housing requirement for Waverley increasing from 519 to 590dpa. The Council has since consulted on Main Modifications to the Plan, including this uplift. The Inspector is currently considering the representations on the Main Modifications before issuing his report.

In order to bring these strands of evidence together, A Review of Housing Needs Evidence across West Surrey HMA has been prepared on behalf of Guildford Borough Council. This report sits alongside the West Surrey SHMA: Guildford Addendum and was commissioned in the context set out in Paragraph 2a-007 of Planning Practice Guidance on Housing and Economic Development Needs Assessments, which outlines the following:

*“Local planning authorities should assess their development needs working with the other local authorities in the relevant housing market area ... in line with the duty to cooperate. This is because such needs are rarely constrained precisely by local authority administrative boundaries.*

*Where Local Plans are at different stages of production, local planning authorities can build on the existing evidence base of partner local authorities in their housing market area but should co-ordinate future housing reviews so that they take place at the same time.”*

### **Statement of Common Ground**

Guildford, Waverley and Woking Borough Councils acknowledge the shared responsibility to meet the full objectively assessed need for housing within the West Surrey HMA, as far as is consistent with the NPPF.

Of the three authorities, Woking Borough Council is the only one with an adopted Core Strategy that post dates the publication of the NPPF. It has an adopted housing requirement of an annual average of 292 dwellings against its objectively assessed housing need of 517. The Core Strategy was adopted on October 2012 and has a plan period up to 2027.

Currently local plan preparation within the three districts is at different stages, as set out below:

	Guildford BC	Waverley BC
Local Plan time period	2015 to 2034	2013 to 2032
Publication date (Regulation 19)	LP Strategy and Sites: June/July 2016 and targeted consultation June/July 2017 LP Development Management Policies: Jan/Feb 2020	LP Part 1: Strategic Policies and Sites: Aug 2016 LP Part 2: Site Allocations and Development Management Policies: June 2018



Submission for Examination	LP Strategy and Sites: December 2017 LP Development Management Policies: April 2020	LP Part 1: Strategic Policies and Sites: Dec 2016 LP Part 2: Site Allocations and Development Management Policies: Nov 2018
Adoption	LP Strategy and Sites: December 2018 LP Development Management Policies: December 2020	LP Part 1: Strategic Policies and Sites: Dec 2017 LP Part 2: Site Allocations and Development Management Policies: April 2019

Woking Borough Council is presently also preparing a Site Allocations DPD which allocates specific sites to enable the delivery of the development requirements of the Core Strategy, including sites for housing. It is intended to publish it for Regulation 19 consultation in early 2018.

Each authority has undertaken a Green Belt review to assess whether the potential release of Green Belt land would be appropriate to meet OAN. All three authorities are seeking to amend Green Belt boundaries through their respective local plans.

The Submission Local Plan for Guildford Borough Council identifies sufficient deliverable sites to meet the objectively assessed need of 654 homes per annum over the plan period. Guildford Borough Council considers that its evidence demonstrates that it is not in a position to accommodate any unmet need arising from Woking. The justification is in part a reflection of a lack of sustainable early delivery sites and in part, reliance upon the delivery of necessary infrastructure, which itself will only be in place after the period in which the unmet need is identified.

In relation to Waverley Borough Council, the preliminary conclusion of the Local Plan Inspector is that the Council should meet both its own needs in full, together with 50% of the unmet need in Woking, resulting in an annual requirement of 590 homes over the Plan Period from 2013 to 2032.

All three local planning authorities acknowledge the need to work together to ensure that as far as possible, and subject to policies in the NPPF, housing needs across the HMA as a whole are met. To this end, each authority is committed to continue to work together in future, to address housing needs arising within the HMA. Waverley's contribution to meeting Woking's unmet need is expected to be in line with the Inspector's initial findings and has therefore been established in relation to the currently identified unmet need to 2027. Guildford has submitted a plan that meets its own OAN and will seek to demonstrate at Examination that it cannot meet any of the remaining unmet need within the HMA before 2027. The Inspectors' recommendations and conclusions reached in terms of both the Waverley and Guildford Plans will determine the level of unmet need that remains within the HMA.

This will need to be recalculated at the point in time Woking undertake a review of their Core Strategy and is likely to be in the context of the new OAN methodology and the housing provision set out in the adopted plans for Guildford and Waverley. It will be for the Woking Plan to demonstrate the extent to which it can or cannot meet its own OAN and any outstanding unmet need remaining within the HMA.

The three authorities will continue to monitor the delivery of housing against the requirements and focus future ongoing discussion on:

- How to align respective evidence base studies with common methodologies and assumptions to ensure consistency;
- When it would be appropriate to review relevant development plans, either in part or in full, in order to address issues of unmet need;
- What measures might be necessary to facilitate the delivery of housing;
- Exploring the merits of and putting in place a mechanism to align the plan periods of the three authorities to facilitate effective cross boundary cooperation and outcomes.

## **Conclusion**

Significant cooperation has already taken place in order to identify and address many common strategic issues in the HMA. This includes the agreement that we collectively form a Functional Economic Market Area. The Duty to Cooperate is an ongoing process that will need to continue after the emerging Development Plans have been adopted. More importantly, there is a strong commitment to continue to explore how housing needs within the HMA may be accommodated.

## Appendix 11: West Surrey areas of common ground

### Duty to Co-operate - Areas of Common Ground

This statement sets out areas of agreement on cross boundary issues identified between Waverley, Guildford and Woking councils.

#### Defining the cross boundary issues

##### Housing (Waverley, Guildford and Woking councils)

Level of housing need  
Approach to meeting unmet housing needs  
Strategic sites close to administrative boundaries and impacts on infrastructure

##### SANGs (Waverley and Guildford councils)

Shared SANG sites

##### Gypsy, travellers and travelling showpeople (Waverley, Guildford and Woking councils)

Methodology to assess needs

##### Employment (Waverley, Guildford and Woking borough councils)

Defining a functional employment market area

##### Transport (Waverley and Guildford councils)

Implications of development strategies on the strategic road network (A3, A281, A31)

##### Green Belt (Guildford and Waverley councils)

Adjustment to Green Belt boundaries close to administrative boundaries

##### Infrastructure

Implications of development strategies on infrastructure capacity and provision

#### On-going informal discussion and liaison

Informal discussion between authorities on the cross boundary issues should take the form of:

- Officer level meeting between the three authorities on a 6 weekly basis

- Members should be kept informed of outcomes of discussions
- Informal discussion on Local Plans before they reach Publication

#### Agreed actions

- Prepare a trajectory across the whole housing market area
- Agree a statement of common ground on unmet housing need
- To publish, consult and agree a functional employment market area (FEMA)
- Each local authority to meet the employment need arising in their administrative area
- Each local authority to meet gypsy, traveller and travelling showpeople needs arising in their administrative area