

# Summary of key themes from the draft Guildford borough Local Plan: strategy and sites consultation

December 2014



GUILDFORD  
BOROUGH

**Further information and alternative formats**

**If you would like further information or to read this document in a different format such as large print or a different language please contact Planning Policy:  
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## **1. Introduction**

We received over 20,000 comments from over 7,000 individuals, organisations and stakeholders during the recent consultation on our draft Local Plan. We are grateful for the time you have spent engaging with the Local Plan process, and for letting us know your thoughts. Further to the initial feedback we published in October, we have now prepared a summary of the key themes from all of the comments we received. This is accompanied by the publication of our 'get involved' website which contains all of the responses we received, and our consultation report (further details below).

## **2. Background**

We are in the process of producing a new Local Plan for Guildford borough to 2031. In autumn 2013, we consulted on our Local Plan Strategy and Sites Issues and Options document. This set out some of the strategic issues facing the borough and some of the possible options to address them. The representations made during this consultation fed into our draft Local Plan, which we published for consultation on 1 July 2014.

## **3. The consultation**

Consultation on our draft Local Plan ran from 1 July to 26 September 2014. During this time, we held about 40 events with the local community and other stakeholders. The Planning Policy team were available six days a week, between 10am and 4pm to discuss the Local Plan at 25 Swan Lane, Guildford and were visited by over 1,200 people.

## **4. Comments by the Leader of the Council, Councillor Stephen Mansbridge**

This is the final output from the recent consultation on the draft Local Plan. It contains a powerful summary of the feedback we received and identifies the key themes.

This document is published at the same time as the draft West Surrey Strategic Housing Market Assessment (SHMA). The SHMA is a joint document produced with Waverley and Woking Borough Councils.

Following this consultation, there is ongoing further work on the preparation of the Local Plan – largely around infrastructure – which, together with the other constraints, will allow the Council to arrive at a housing number. We will continue to use every mechanism to get this number to the lowest sustainable point possible to pass the Inspectorate's examination.

We are also taking into account recent statements from the Secretary of State and Department for Communities and Local Government. The Planning Inspectorate has now been given a clear indication and stronger 'steer' not to allow development that will harm the Green Belt.

We will publish the Council's response to the key issues raised during this consultation alongside publication of the next iteration of the Local Plan, which we aim to consult on next summer. The plan will bring together changes as a result of the comments received, as well as the further work on the impact of constraints.

We recognise that you have raised many important issues during this consultation. We continue to work towards achieving a sound Local Plan that finds a balance between providing the new development we need and ensuring Guildford borough retains its important characteristics.

I am now writing to the Secretary of State to make the case for the uniqueness of Guildford borough. This includes seeking support to waive the five year housing land supply requirement, which will allow large scale brownfield sites to be brought forward over the plan period, to help fulfil the housing number.

## **5. Next steps**

National policy and guidance states that we must meet our objectively assessed needs unless constraints indicate that development should be restricted. One of the key themes coming out of the consultation is the need to have a better understanding regarding the cumulative impact of development on our infrastructure, notably our roads. To assess this we are progressing a number of transport related studies. These include a further assessment of the cumulative impact of development on the highway network including specific work looking at the A3, and detailed work on the town centre. As part of this, we are continuing to work with Surrey County Council and the Highways Agency.

We are continuing to work closely with key organisations. This includes for instance the Environment Agency in relation to flood risk. We are finalising an update to our Strategic Flood Risk Assessment, which will inform decisions on whether further site-specific work is required. We will also consider feedback from Natural England in relation to the Special Protection Area (SPA) to assess whether we have sufficient Suitable Alternative Natural Greenspace (SANG) in order to mitigate potential harm to the SPA. We are finalising the Employment Land Needs Assessment (ELNA) and have published the draft West Surrey Strategic Housing Market Assessment (SHMA).

We will also continue ongoing discussions with infrastructure providers in relation to their services, to understand what new or expanded provision will be required in order to support planned growth. This will feed into our Infrastructure Delivery Plan. This includes for instance dialogue with Surrey County Council on the need for, and provision of, new secondary schools.

## 6. Reading the key themes, consultation report and responses

### Key themes

This document presents the key themes from the many consultation responses we received. If you are reading a paper copy of this document, it is also available on our website at [www.guildford.gov.uk/draftlocalplan](http://www.guildford.gov.uk/draftlocalplan).

Given the volume of responses received, whilst there are key identifiable themes, many people raised different issues, and expressed some support for elements of the plan. If you did support some aspects of this plan, or made comments that are different to those listed below, your comments may not be specifically reflected in the following themes. However, all responses have been noted and considered. We received comments from groups that are seldom heard, including young people, students, the traveller community and disability groups.

### Consultation report

The consultation report details the process of consultation, providing more information on the method of consultation and the events undertaken. This document is also available on our website at [www.guildford.gov.uk/draftlocalplan](http://www.guildford.gov.uk/draftlocalplan).

### Responses

You can access all of the responses we received by visiting the planning consultation website at [getinvolved.guildford.gov.uk](http://getinvolved.guildford.gov.uk). The [Draft Local Plan: strategy and sites 2014](#) consultation can be found in the Archive section. You can find the published comments by opening the consultation and clicking on 'View the responses' under 'Consultation links'. Alternatively, you can click on the online document you wish to view comments about and use the 'View comments' buttons that are visible throughout the document. You do not need to register or log in for either of these options.

Whilst some respondents selected 'support' or 'object', their following commentary often explained the categorisation and in some cases only objected to one aspect of a policy's proposed wording or proposed site allocation. We would advise caution if looking at numbers of 'support' or 'object' for a policy without reading the variety of comments made.

If you are particularly interested in a specific subject area, and wish to understand the response we received from some key organisations, then you may wish to search for the following;

- English Heritage
- Environment Agency
- Hampshire County Council
- Highways Agency
- Natural England

- Surrey County Council
- Thames Water

Many landowners and developers also responded to the consultation, generally supporting proposed site allocations and providing further information about sites. In some cases, promoters of land not identified in the draft Local Plan have also responded, making the case for land to be considered for development in the future. These responses are not individually referenced in this key themes document but they are available to view on the 'get involved' website, along with all the other responses.

We have also received petitions relating to the proposals in the draft Local Plan. The petitions we have received have been considered in accordance with the Council's petition scheme, which can be viewed on our website at [www.guildford.gov.uk/petitionscheme](http://www.guildford.gov.uk/petitionscheme), and the key themes have been incorporated into this document.

Terms and conditions relating to the use of the consultation website 'get involved' are available at [getinvolved.guildford.gov.uk](http://getinvolved.guildford.gov.uk). The terms and conditions say that we may delete, move, edit or remove any communication that is deemed unsuitable without giving a reason (see paragraph 8 of the terms and conditions for more information). We are not legally obliged to publish the responses we received during this consultation, and have redacted text that we do not feel is suitable for publication. This includes comments that are negative or insulting about a particular group of people or person. In many cases, the redacted text is where respondents have provided personal information such as addresses, phone numbers and email addresses.

Comments that we received by letter or hard copy questionnaire have been categorised with the most appropriate section of the draft Local Plan. You may find it easiest to find your own comments by using the 'list of respondents' link and searching for your name. Please also note that we have identified the key themes according to the most appropriate policy area. As a result, your comment may not appear under the section where you submitted your response.

## **7. Summary of key themes from the draft Local Plan consultation**

### **Introduction and background**

- Concerns about the document structure and the wording used in the Forewords
- Clarification requested on role and timetable of Delivering Development document
- Evidence base is incomplete and changing
- Previous consultation responses have been ignored
- Document is aspirational rather than enforceable, vague and passive
- Concern about the impact of development on the infrastructure

### **Key facts about the borough**

- Evidence base is incomplete and inaccurate
- Demographic projections are wrong
- No evidence of how constraints have been applied
- No evidence that any new infrastructure will be put in place to cope with growth
- No real effort to focus development in urban areas

### **Our vision and ambition**

#### Vision

- Lack of a strategic vision of what Guildford will look like - both the town centre and the borough as a whole
- The vision should mention maintaining and improving what already exists within Guildford
- Lack of a vision for the villages - just housing sites
- Clear overall vision but it lacks detail and is too reserved
- The vision is good, however, it does not match the draft Plan proposed

#### Sustainability

- The plan does not strike the appropriate balance. It favours housing growth and the economy at the expense of social and environmental objectives
- Surface water flooding issues are not acknowledged
- Insufficient infrastructure is identified to support the level of growth proposed (primarily relating to transport)

### **Policy 1: Presumption in favour of sustainable development**

- Support for the positive approach to development and working with applicants; comprehensive plan-led development is preferable
- Support efficient use of land and developing brownfield sites first
- The need for homes is high so a presumption in favour of development is sensible; we need a higher quantum of development to meet a historic under-supply of housing
- Give high priority to helping local businesses grow
- Concerns over the impact of development on existing infrastructure and delivery of new infrastructure
- Sustainability needs a clearer definition based on National Planning Policy Framework (NPPF) core principles

- The plan is not sustainable; it contains all the possible options and impacts without joining these together into a sustainable plan
- The policy fails to distinguish between presumption in favour of sustainable development and a presumption in favour of any development at all
- Object to sustainable development and its impact on infrastructure and local amenity
- The Policy ignores the NPPF's 12 core principles
- The housing number is not sustainable; it is too high and risks overdevelopment
- Expanding the workforce is unsustainable and unjustified
- The policy overlooks other parts of the NPPF (e.g. empowering local people, restricting development in the Green Belt, protection for birds and habitats directive, protecting natural, built and historic environment, neighbourhood plans) and places too much emphasis on growth and economic expansion at the expense of environmental and social objectives. The NPPF advises that where there are significant adverse impacts against any of the three dimensions of sustainable development alternative options should be pursued
- Monitoring of the policy needs review and focuses on housing and commercial development – it should also include economic, social and environmental indicators and provision of infrastructure
- Plans need to take local circumstances into account so that they respond to the different opportunities for achieving sustainable development in different areas
- Support the building of “community hubs” in sizeable settlements
- The policy needs to specify constraints that apply such as environmental considerations, e.g. Area of Outstanding Natural Beauty (AONB) and Thames Basin Heaths Special Protection Area (SPA), and that development on the Green Belt must only be in exceptional circumstances
- Although the individual houses may be sustainable, the wholesale introduction of development sites into Green Belt villages is not
- To promote sustainability needs a wider vision of how we develop without compromising Guildford for future generations by identifying our irreplaceable assets e.g. national and local designations and countryside, ancient woodland, great landscapes, the downs, farmland, allotments, heritage features and designations, community identity, architecture, clean air and water, places of recreation, wildlife, habitat
- Concern that the uncertain evidence base impacts on the draft Local Plan's ability to deliver sustainable development

## **Policy 2: Planning for the borough - our spatial strategy**

### Housing numbers

- The housing need number is too high
- No justification for this need
- The evidence base is flawed
- Far higher housing figure than neighbouring authorities
- The Council should agree to around 300 homes per year
- The housing numbers will alter the character of Guildford and change it from semi-rural to urban, which will not be in-keeping with the area
- Any new housing will become overspill for London workers, therefore selling quickly and having no positive impact on affordability and lack of housing



- There are no given solutions to the demand on infrastructure, which is already at breaking point. The lack of infrastructure should act as a constraint against development
- A general understanding of the need for new homes, just not at the proposed quantity
- Some arguments put forward to say that we need at least 652 homes a year in order to meet the Objectively Assessed Need (OAN), as this is at the bottom of the Strategic Housing Market Assessment (SHMA) range. This will also help in positively affecting affordable need

#### Housing locations

- Loss of Green Belt is unacceptable and no exceptional circumstances have been given to suggest otherwise
- More development should be focused on brownfield sites
- Development is not equally distributed across the borough
- Town centre should be used for housing, and vacant commercial sites will be enough to cope with genuine business need

#### Evidence

- Need an up to date SHMA otherwise comments on the draft Local Plan have no meaning
- Current SHMA uses of out of date Office for National Statistics population projections
- The University of Surrey has land to build on and this should form part of the Strategic Housing Land Availability Assessment (SHLAA)
- The University creates a distorted need for housing as the students do not stay indefinitely so effectively replace themselves
- There has been no account for windfall or developments that already have planning permission but are yet to commence
- The draft Local Plan does not reflect recent Government policy e.g. turning offices into homes and reducing international migration

#### **Policy 3: Homes for all**

- The Council has worked hard to develop an inclusive approach to policies and proposals, and this policy caters for a good mix of all types of housing to meet the needs of a spectrum of future home owners
- Support the flexible approach to housing mix and density which allows consideration of the characteristics and location of an application site to help ensure that new development complements existing built and natural environments
- Affordable, social and market housing must be mixed together to ensure an integrated community
- Many workers cannot afford homes close to work so more new homes are needed
- Density, building height and spaces between buildings should be appropriate to character and topography of area and dependant on sustainability of site
- Specify density by area/ decide on a case by case basis
- High densities in order to meet housing targets are not acceptable. Avoid garden grabbing
- Opt for higher densities and less use of land but include green spaces (for all ages)

- Viability statement needs to be more robust, and the level of information required to support a viability case specified; it is currently open to abuse. This statement enables all other policies in the Local Plan to be overridden
- Until the SHMA housing number is established, it is wrong to discuss how that number might be split into dwelling types
- There is no detail of the actual numbers and mixture of the types of property to be built; the policy should be supported by correct statistics, appropriate data and analysis
- This is an admirable policy but it misses what needs to be delivered within neighbourhoods and communities, particularly to address deprivation
- The wording needs amending and the title is misleading: we should not be meeting housing demand by providing homes for all which will exceed the infrastructure and capacity of the borough and encourage in-migration

#### Housing type

- Need for wide range of housing sizes and prices including properties for downsizing, self-build plots, lower priced small units and flats, family housing with gardens, housing to enable downsizing, students, homes for older people, sheltered housing, bungalows, specialist accommodation, hostels, accommodation for adults with learning difficulties and special needs, skilled/key worker housing, homes for young professionals, rural workers housing, homes for first time buyers and affordable housing to meet local needs
- No more large expensive executive homes for commuters which do not meet local need
- Enable the elderly to live safely in their own homes for as long as possible and enable an intergenerational mix in developments to address social isolation
- Build dementia friendly environments and recognise needs of disabled people
- Impact of students renting town homes has contributed to housing shortage and had an impact on new housing required. Students do not stay in Guildford after completing courses
- University should provide all/more student accommodation on campus which can be built to a higher density; unimplemented planning permissions should be built
- Students vary in their accommodation needs and are free to choose where to live. This policy will not change that and would be difficult/impossible to enforce. Demand for on-campus accommodation is 50% to 55% of eligible students. Object to percentage requirement for student accommodation
- Student figures have been calculated and counted incorrectly. Cap/restrict number of students living off campus
- Limit/support/license/monitor Houses in Multiple Occupation (HMOs) and avoid gated communities, encourage mixed communities
- Travellers pitches are vital but should be proportionate to national need
- Take into account recent Government guidance/definition on travellers; avoid concentration of pitches in one area
- Query whether mixing traveller accommodation with market housing on strategic sites is practical
- Traveller sites in the Green Belt are inappropriate, concern about where sites will go and the number. Consistency needed as regular housing is not permitted in Green Belt

#### **Policy 4: Affordable Homes**

- Support more affordable housing; fewer executive homes
- Support locating affordable housing close to jobs, services and transport
- Support all affordable housing built being permanently retained as such
- Remove “subject to viability” clause as it encourages developers to avoid providing affordable housing
- Affordable housing in rural areas should only be built for people with a connection to the parish, and not for other people on the borough housing register
- Affordable homes should be in character with the area
- Requiring a lot of market housing to be built to get affordable housing is a risky strategy
- Requiring developers to provide affordable housing increases house prices
- The policy needs to be reconsidered when SHMA is completed, which will provide updated housing need figures
- Paragraph 4.46 regarding developments which seek to avoid the policy requirements should be in the policy rather than the supporting text

#### **Policy 5: Rural exception homes**

- Delete the “viability” clause in the supporting text for inclusion of as object to market housing in the Green Belt
- The cascade provision, in the supporting text, implies that rural exception housing may be built without a demonstrated need in the parish; it should be built for local needs only
- Welcome supporting text regarding input of Parish Councils to the Local Needs Surveys
- Traveller sites are not appropriate in the Green Belt

#### **Policy 6: Making better places**

- The policy is supported but with room for development.
- Agree with idea of promoting non car based transport
- There should be a design Review Panel
- The policy is unenforceable and should therefore use ‘require’ rather than ‘expect’
- No commitment to design quality or attractive design but design should still be flexible to avoid homogeneity
- Need to keep the green distinctiveness of Guildford
- Rules should not just apply to residential, but to all developments
- Houses should not be built where a commute will be necessary as this will add to congestion and not make places better

#### **Policy 7: Sustainable design, construction and energy**

- Support for the policy in principle
- The policy is weakly worded and imprecise, open to abuse and should not leave room for negotiation
- The policy should include specific requirements, for example rainwater harvesting, grey water reuse, Swift nest boxes, car charging points, a renewable energy requirement and solar panels
- The policy should cover more elements of sustainability, for example: sustainable transport, air quality, flood risk
- The viability clause should be removed

- Use 'require' rather than 'support'
- The policy should rule out Green Belt development as it is unsustainable, and developments that would be environmentally unsustainable
- The regulation of carbon emissions in new development should be left to national policy

**Policy 8: Surrey Hills Area of Outstanding Natural Beauty (AONB)**

- Generally equal split between supporters and objectors to the policy, however, most of the objections were regarding technical matters and related to a misunderstanding of the differences between Green Belt and AONB
- The importance of views and setting of the AONB was not given enough emphasis
- Recognition and protection of the Area of Great Landscape Value (AGLV) is supported
- Need to define what is meant by 'specific' types of development
- Paragraphs 4.105 and 4.106 should be included in the policy

**Policy 9: Villages and major previously developed sites**

- Support for policy where it delivers sustainable development of affordable or smaller homes and is accompanied by the required infrastructure
- The NPPF is permissive rather than prescriptive regarding inseting of villages
- Inseting will enable additional development that will impact on character, landscape, heritage, biodiversity, tourism and existing infrastructure such as roads, parking, schools, health facilities and utilities
- Many villages unsuitable for development; lack the services and facilities to support it, have issues such as flooding
- West Horsley (North) should not be considered as part of East Horsley
- Send and Send Marsh/Burntcommon are part of the same parish and should be considered together
- Policy needs more clarification on what sort of new business development will be supported
- Many villages are inappropriate locations for main town centre uses
- Previously developed sites should be considered as part of a separate policy
- Suggestions included for more appropriate boundaries

**Policy 10: Green Belt and the Countryside**

- Support protection of the Green Belt
- Some supported the new Green Belt south of Tongham whereas others felt that the Green Belt in the east (closer to London) was more important and should be protected in preference to creating more in the west (further from London)
- All countryside should have similar protection to that given to land designated as Green Belt
- Have not demonstrated the exceptional circumstances necessary to review Green Belt boundaries. Government guidance states that unmet housing need does not count
- Green Belt boundary was only reviewed ten years ago whereas it should be permanent
- Green Belt and AONB are constraints to meeting housing need
- All Green Belt should be protected as it serves the main purposes set out in the NPPF as well as other important functions such as recreation, wildlife, flood prevention, character and air quality

- Sets a precedent for future reviews to the Green Belt and more development
- The Green Belt part of the policy needs more detail and should include wording from the NPPF

#### **Policy 11: Ash and Tongham Strategic Location for Growth**

- Support for the principle of the Strategic Location for Growth, the area of separation, new Green Belt, focus on infrastructure and the preparation of a Supplementary Planning Document (SPD)
- The proposed SPD needs to be developed alongside the Local Plan, not come later, and it needs to take the evolving plans of neighbouring authorities into account
- Ash Green needs to be better protected/distinguished from the area of growth
- The area is receiving special/favourable treatment: Green Belt should not be created when it is being lost elsewhere, other areas do not get an area of separation or the same quality of infrastructure planning
- Infrastructure will be overwhelmed by cumulative development which includes existing permissions, draft Local Plan proposals and proposed developments in Rushmoor, Waverley and Surrey Heath boroughs
- Flooding is a key issue that needs to be better addressed
- The area has already taken significant levels of development and infrastructure is already stressed

#### **Policy 12: Historic Environment**

- Generally support the policy as it supports the assets that make the area attractive  
Important to create monuments for the future
- The wording of the policy is weak/insufficiently detailed: 'will seek', 'it is hoped', - lack of commitment to historic assets
- The policy should go further and cover issues such as enforcement, undesignated assets, developments adjacent or near heritage assets, natural heritage assets
- The policy is too geared towards enhancement when it should aim to preserve. Heritage assets are not in need of enhancement, enhancement should be regulated
- There is a need for evidence on the historic environment, its condition and needs. Heritage assets should be listed and mapped
- The draft Local Plan as a whole will damage heritage, in contrast to this policy
- Conservation area appraisals should be done before the next consultation
- The policy should protect the Green Belt and villages/Conservation Areas in the Green Belt
- The policy needs to be clear about what is and is not being protected, and not preserve things that do not need to be

#### **Policy 13: Economic Development**

- The Employment Land Assessment (ELA) is not up to date and therefore does not support the policy – raises soundness issues as the policy is not based on accurate evidence
- The policy should place more emphasis on high skilled employment
- The use class that is suggested is too low skilled

- The Local Plan needs to be more explicit in its definition of the types of businesses being proposed and why the sites allocated should be suitable for the targeted sectors to ensure the correct type of employment space is made available in the correct places
- Concern regarding the balance of land, jobs, commuting and homes with some responses saying more homes were needed to support the economy and other responses saying we should be providing more economic land and should be using strategic sites to meet housing need
- Support the policy as there are not enough jobs, the borough needs to maximise and strengthen its position
- The policy has not accounted for the growth in home working and today's buying patterns. When accounted for, this could mean less land would be needed for economic development
- Poor road infrastructure is affecting economic success. New employment cannot be supported by the existing infrastructure
- The policy fails to protect the Green Belt or consider environmental constraints
- There should be no encroachment to the Green Belt until all brownfield sites are used, more emphasis needs to be made on reusing and intensification rather than new land for economic development
- The policy should protect and promote small community businesses and the rural economy. The Local Plan should be more positive and enabling towards the rural economy without urbanising areas
- The historic character needs to be taken into consideration when delivering new economic growth, could risk harming the economy by developing business estates in the countryside
- The policy should include Walnut Tree Close and Woodbridge Meadows as employment land as there is appropriate infrastructure to support growth

#### **Policy 14: The leisure and visitor experience**

- The policy does not list some of the main facilities
- The policy is weakly written
- The beauty of the countryside is what attracts people – do not need anything else
- Do not need any more accommodation. The university has plenty of rooms that are free for a large part of the year that could be used
- Need to make more of the River Wey, AONB and Countryside as they attract people. These are main tourist attractions so should not be ruined
- Tourism is not treated as a serious enough part of the economy
- Question why there is not a visitor strategy? There is reference to a yet to be published document

#### **Policy 15: Guildford Town Centre**

- The policy should expressly preserve the character, historic assets and setting of the town centre
- Support housing in the town centre; more sites should be developed for new homes
- Less retail is needed than is proposed here
- Inappropriate expression "build on these assets" in the Vision could be seriously misleading

- Take care with building heights and protect views
- More should be made of the River Wey and riverside land
- The number of independent shops and lower shops vacancies than elsewhere are amongst the town centre's strengths
- Traffic is a problem in Guildford town centre

#### **Policy 16: District and Local Centres**

- Set out justification for why impact assessment threshold should be lower than national threshold
- Should have same threshold for requiring impact assessment for the town centre and for district and local centres
- Station Parade at East Horsley does not have a large supermarket and so should not be a district centre; will cause harm if designated a district centre
- The policy says nothing about how the Council will protect existing rural shops and centres
- Land is scarce and it should not be wasted, therefore new development should provide underground parking

#### **Policy 17: Infrastructure and delivery**

- Object to planned development as existing infrastructure is already at or near capacity
- Existing infrastructure problems must be solved before any more development is permitted
- Not clear where the funding for new infrastructure needed will come from, nor whom will provide it
- Economic viability clause weakens policy; development should not be allowed if necessary infrastructure cannot be provided
- Existing **road and parking infrastructure** is already inadequate or under pressure and would worsen with the planned development, reducing quality of life, particularly : Walnut Tree Close at rush hours; the strategic road network i.e. A3 and M25 and in particular the A3/M25 junction area; through traffic in the Horsleys; through traffic in Send particularly Potters Lane; Farnham Road; Woking Road; Cobham Way, East Horsley; Jacobs Well; Halfpenny Lane and Blacksmith Lane, and Chilworth
- Existing **health infrastructure** is already inadequate or under pressure and would worsen with the planned development, particularly the medical centre at East Horsley; Send; and the Royal Surrey Hospital
- The following areas experience **flooding** that would worsen with the planned development, reducing quality of life, particularly : the Horsleys; Send Marsh; Jacobs Well; River Wey; Keens Lane, and Tangle Lane
- Existing **school infrastructure** is already inadequate or under pressure and would worsen with the planned development, particularly : specialist schools; primary and secondary schools local to Horsley, Stoughton; Worplesdon; and Effingham
- Existing **water supply and / or waste water infrastructure** is already inadequate and would worsen with the planned development, particularly in the Horsleys
- Existing **public transport / cycling / pedestrian infrastructure** is already inadequate or under pressure and would worsen with the planned development, reducing quality of life, particularly: rush hour trains into London, many pavements are unsafe for pedestrians and wheelchair users; and trains from Worplesdon are already overcrowded

- Superfast broadband is inadequate in many areas
- Existing **electricity supply infrastructure** is already inadequate or under pressure and would worsen with the planned development, particularly in Fairlands and Worplesdon

#### **Policy 18: Sustainable transport for new developments**

- New rural development will be car dependent; and with few cycle routes and footways, will result in more traffic, accidents and air pollution
- Policy wording should be more forceful; e.g. replacing "expect" with "require"; unclear how Council will "facilitate"
- Need to improve network of dedicated cycle routes and cycle storage; cycling has many benefits
- Providing public transport does not ensure its use
- Scale of proposed development is too much for local infrastructure and will require new, large projects
- A good bus network would be critical in reducing congestion and carbon emissions
- New development should mitigate the impact on the Local and Strategic Road Networks

#### **Policy 19: Green and blue infrastructure**

- Policy is generally welcome although it was felt it needs development to become enforceable and less aspirational
- It is important to enhance the River Wey and make sure future developments do not have a negative impact on it. This could particularly be done at Walnut Tree Close, providing some new homes too
- Question whether Green Infrastructure (GI) will be provided as part of a development
- The provision of a basketball court would be very well received
- Propose designation of land at Stonebridge Depot as a wildlife refuge
- Need further definition and designation about protecting public rights of way, allotments, public green space etc
- The current draft Local Plan would have an adverse impact on wildlife
- No mention of Local Green Space for Send, despite there being a nature reserve (Heathfield) and a Millennium Green Space (Bush Lane Woods)

#### **Appendix A - Glossary**

- Travellers generally no longer travel, but are of a recognised ethnic group
- No definition of urban
- Clarify the definition of sites larger than 200 homes
- The Green Belt definition should not refer to landscape

#### **Appendix B - Infrastructure Schedule**

- Critical infrastructure needed to support the planned development should be listed in Appendix 2, but the list has little detail or costing
- Object to construction of a car park on common land at Effingham Common
- Sustainable Movement Corridor is unrealistic, not costed and an outline design has not been provided
- No up-to-date assessment of need for open space, sports and recreation facilities – as required by NPPF paragraph 73



- Strategic site development is to some extent inevitable, but insufficient information is provided about improvements to transport infrastructure to support this
- Surrey County Council's initial assessment of the two proposed secondary school sites found transport and ecological concerns
- Surrey County Council anticipate needs for secondary education should be met in a sustainable way and any new schools should be located on suitable land near to the communities that they are intended to serve
- Surrey County Council will continue to co-operate with the Council to find new sites for:
  - potentially two more primary schools; one to the west of the town and one on edge of Guildford town centre, in addition to those in draft plan
  - at least one new secondary school (depending on size)

### **Appendix C - Evidence Base (and question 1 of questionnaire)**

- Support for the evidence base
- The Council should not use consultants with links to development
- The evidence base is too difficult to access or understand
- The evidence base is manipulated to achieve a desired outcome (more development)
- There are missing studies:
  - Strategic Environmental Assessment (SEA)
  - Sustainability Appraisal (SA) of sites
  - transport strategy/survey of rail and bus passengers
  - tourism survey/ up-to-date visitor strategy
  - Viability assessment
  - Infrastructure Delivery Plan (IDP)
  - needs of vulnerable people, homeless and LGBT community
  - ecology and biodiversity
  - up-to-date Employment Land Assessment (ELA)
  - Duty To Cooperate topic paper
  - Equalities Impact Assessment (EIA)
  - heritage statement or strategy
  - climate change impact
  - custom and self-build demand assessment
  - review of brownfield land in the borough
  - up-to-date retail study
  - up-to-date Strategic Flood Risk Assessment (SFRA)
- The Retail Study is out of date so not compliant with the National Planning Practice Guidance (NPPG), does not address needs of potential development, does not cover changing retail patterns (online, mobile payments) and does not acknowledge retail space approved since 2011
- Viability should include cost of traveller pitches, as the study is out of date the affordable housing requirement should be an 'up to' target
- The existing SFRA is not up to date and account has not been taken of the Surface Water Management Plans (SWMP) for Ash and Guildford
- The Index of Multiple Deprivation used is now well out of date with a new one due soon. This data should be updated when it is released

## Strategic Housing Market Assessment (SHMA)

- The housing number/objectively assessed housing need is too high or SHMA is flawed:
  - out of date or flawed Office for National Statistics data
  - should not use 2011 as a start date for the projections
  - the data has not been analysed correctly
  - there is no justification for increasing the target to 800 homes per annum as being able to “support improvements in affordability”
  - incorrect use of student numbers/student numbers should not be considered
  - the SHMA is in draft form and does not cover the whole housing market area
  - insufficient application of constraints including environmental, Green Belt, service capacity, flooding, congestion
  - incorrect immigration assumption; five year trend in migration is used – should be a 10 year trend, trend is unlikely to continue due to national politics, changes in the EU and recent changes to the visa system
  - the housing number is driven by high jobs figure with no evidence that this is needed
  - there is no suppressed demand for housing/suppressed demand should not be considered
  - the proposed population growth is very unlikely
  - housing need should reflect local need only, not migration or London’s overflow
  - the SHMA makes unsubstantiated assumptions and there are contradictory statements on affordability
  - no allowance has been made for empty properties/“vacancy allowance” is not supported by the NPPF
  
- The housing number/objectively assessed need is too low:
  - the Council has chosen a figure at the lower end of the housing number range with no adequate justification. The reduction to 652 has been done in order to offset the need from students. The draft SHMA concludes that 670 would be the minimum demographic requirement
  - no consideration of unmet need in neighbouring councils and London – should consider whether the shortfall can be met in Guildford
  - errors in historic supply/no account of historic under supply
  - affordable housing need is high and evidence of deteriorating affordability suggests a case for an upward adjustment to the housing number. The draft SHMA relies too heavily on the private rented sector to meet affordable housing need
  - the draft SHMA advises that further research should be undertaken to test the ability to deliver 780 homes. This work has not been done or published
  - historic undersupply in the SHMA does not take account of the objectively assessed need as it has in the housing topic paper

## Green Belt and Countryside Study (GBCS)

- GBCS is flawed or manipulated:
  - scoring is subjective or flawed and confuses NPPF advice for inseting and defining boundaries
  - non-permanent features such as trees and hedgerows used as defensible boundaries
  - sustainability assessment not comprehensive enough/is too simplistic
  - incorrect assessment of land parcels
  - does not adequately consider landscape character and environmental capacity analysis is incomplete
  - Green Belt criteria were not used or applied properly
  - there are many factual errors
- The presence of defensible boundaries should not be a factor in deciding whether to inset a village
- The GBCS should seek to reinforce the Green Belt, not aim to roll it back
- Settlements are not necessarily uniform in character and should not be considered for inseting as a single block

## Infrastructure Baseline (IB) and Infrastructure Delivery Plan (IDP)

- The IB is poor and does not demonstrate that the proposed developments can be supported or take sufficient account of existing infrastructure deficits
- New infrastructure is only considered where there is a strong case or existing gaps
- Existing infrastructure deficits should be removed before more development is considered
- The IDP is listed as a key study but is not yet in place. It needs to be in place before development goes ahead

## Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA)

- Neither were published until 6 August 2014 despite consultation starting on 1 July 2014. The SA should influence the drafting of the draft Local Plan so should be produced at the same time
- The SA does not give enough detail regarding environmental, biodiversity and landscape considerations and does not consider important impacts like climate, health and traffic
- The SA has not been done correctly; sustainability indicators ignore important factors, the whole plan impact is not considered, including the impact on the Special Protection Area

## Settlement Hierarchy and Profiles

- The documents are manipulated to promote growth
- The data for settlements is incorrect; private schools included in education provision, settlements scored incorrectly, non-existent facilities
- The return of data from parish councils was inconsistent

- Should not use population as a factor
- Settlements should be ranked by capacity, not sustainability
- Small settlements have been lumped together to create larger settlements

#### Strategic Housing Land Availability Assessment (SHLAA)

- Sites sometimes include Suitable Alternative Natural Greenspace (SANG) and sometimes not
- It should be a joint study covering a wider area than the borough
- It should not address sites of less than five units
- It does not maximise brownfield use
- There is no allowance for windfall or outstanding permissions
- It should count student accommodation
- Some submitted sites have not been included erroneously/key sites have been missed/brownfield sites have been missed
- It includes some sites that are on floodplains/waterlogged ground
- It does not adequately consider all relevant factors including access and viability
- It is not clear why some SHLAA sites are not replicated in the draft Local Plan, if there is a cut-off, this should be explained
- The data presented in the SHLAA can be unclear or difficult to understand

#### Transport

- Studies assumed zero population growth
- Incorrect baseline figures
- Local Road Network (LRN) and Strategic Road Network (SRN) not addressed
- Local Transport Strategy not available, does not have regard to M3 Local Enterprise Partnership (LEP) evidence
- Options Growth Scenarios Transport Assessment Report (OGSTAR) completed before draft Local Plan finished
- No regard to Guildford Town and Approaches Movement Study (GTAMS) in the draft Local Plan
- Lack of supporting studies e.g. for rail capacity
- A lack of evidence in support of two proposed railway stations/halts
- The performance of the highways is already deteriorating

#### Employment Land Assessment (ELA)

- The existing ELA uses out of date data
- The forecasting methodology is flawed
- Recent trends are unlikely to continue as the economic boom of the last 10 years is unlikely to be repeated, and shopping and working patterns are changing
- The need for new land can be met by redevelopment of existing sites
- The ELA should drive a switch away from retail and similar uses towards high-tech, medical and knowledge based economy uses

#### **Appendix D - Superseded Policies**

- The policies may cover similar issues but wording of policies is more vague than the 2003 policies

#### **Appendix E - Borough overview map**

- River Wey corridor needs to be included to ensure it is considered a strategic asset in the borough

#### **Appendix F - Policy and Monitoring**

- Provision of development is not the only measure of success
- Monitoring of the historic environment using solely the Historic Environment Records is not sufficient

#### **Appendix G - Maps**

- The majority of comments received focussed on Effingham, Fairlands, Normandy and Flexford, Guildford urban area, Horsley, Send, Shalford and Worplesdon
- Effingham - concern about loss of Green Belt, insetting of the village, impact on infrastructure, a potential car park at Effingham common and proposals for a new school and enabling development
- Fairlands – concern about loss of Green Belt, infrastructure currently unable to cope – regular power cuts and flooding, issues with access and parking, impact on wildlife
- Normandy and Flexford - concern about loss of Green Belt, impact on infrastructure particularly flood risk and drainage, loss of agricultural land, impact on the character of the village, the term safeguarding is misleading
- Guildford urban area – concern about loss of Green Belt, existing traffic congestion will be exacerbated, creation of urban sprawl and loss of green spaces
- Horsleys - concern about loss of Green Belt and insetting of the village from the Green Belt, no exceptional circumstances to amend Green Belt boundaries, number of homes proposed in the village is too high, infrastructure cannot cope with the amount of growth proposed, concern about the impact of potential development at the former Wisley airfield on the village
- Send/ Send Marsh – too many homes proposed for the local area, with unacceptable impact on traffic congestion and local services, loss of village identity, detrimental to the community and increased flood risk. Concern about the suitability of proposed traveller pitch and impact on street parking
- Shalford – oppose amendment to village settlement boundary, and potential development of land behind the village hall, concern about harm to the Green Belt and AGLV, concern about the impact of development on traffic congestion and pedestrian safety
- Worplesdon – too much development proposed in Worplesdon, infrastructure cannot cope, concern about loss of Green Belt, disproportionate amount of development proposed in the area
- The key themes relating to other areas of the borough relate to concern about the loss of Green Belt, the distribution of development, flood risk and the impact of development on infrastructure and services, particularly traffic, health and education

## **Planning for sites**

### **Guildford Town Centre**

North Street (Site 20)

- Refurbish the bus station in its current location
- Must include housing on the site
- Too much retail proposed; could have negative impact on existing shops in the centre

### **Guildford Urban Area**

- Concern regarding Guildford cathedral proposals (Site 43), especially loss of views, green space, protected open space and impact of development on the setting of a listed building
- Pond Meadow (Site 46) – should be allocated for educational use in place of the proposed new secondary schools, or community use (including a medical facility)
- Slyfield Area Regeneration Project (SARP) (Site 48) – flood risk and transport infrastructure concerns, however some support for proposed site allocation, particularly if supporting infrastructure provided
- Tony Purslow (site currently being used for temporary parking for hospital) – concern about loss of this car parking, however some support for this site allocation. Alternative uses suggested included specialist housing for elderly

### **Ash and Tongham Urban Area**

- Concern about infrastructure, narrow lanes and traffic congestion
- Concern regarding high density and loss of village character

### **Within villages**

- Objection to proposal at East Horsley countryside depot and BT exchange (Site 57) because it would change the character of the area as the site is partly in a conservation area and is close to listed buildings. The impact on infrastructure, the site is not suitable for Traveller pitch and the proposal is too dense
- Objection to proposal at the hotel (Site 58) due to impact on traffic congestion and pressure on existing difficult junction. Concern about the loss of a building of local interest. Some support for redevelopment

### **Land around Guildford urban area**

- General feedback themes across all sites – harm to Green Belt, no exceptional circumstances identified to justify loss of Green Belt, infrastructure cannot cope with amount of growth proposed, infrastructure not given adequate consideration in the draft Local Plan, the infrastructure proposed is not sufficient, traffic congestion, brownfield sites should be used instead/first, plenty of available brownfield sites, new homes will not meet local need and will provide properties for those currently living outside of the borough or investors
- Gosden Hill Farm (Site 59) – adverse impact on West Clandon, creating sprawl and joining areas together, four way junction or junction improvements needed at A3, some support for new train station at Merrow, concern about the impact on the setting of the town, concern about viability if the developer is required to provide all of the infrastructure needed, particularly if this means less affordable homes

- Blackwell Farm (Site 60) – increased traffic and impact on A31 and A3, impact on AONB and loss of views, loss of amenity land, impact on infrastructure, impact on wildlife, loss of agricultural land, flood risk, impact on other nearby areas such as Wood Street Village, Park Barn, Onslow village and Fairlands. In relation to the University of Surrey, requests for more information about unimplemented planning permissions, suggestions that the University of Surrey has not kept promises previously made, support for more students living on campus and development/more efficient use of surface car parks within the university campus
- Land north of Keens Lane (Site 61) – specific concerns about the standard of Keens Lane (narrow road and on street parking since new developments built), impact on wildlife corridor, impact on the common, question the need for a care home, impact on the character of the area, number of homes proposed too high, disproportionate amount of development proposed in Worplesdon ward
- Land at Liddington Hall (Site 62) – site contaminated, site been rejected previously, impact on rights of way, impact on wildlife, loss of green space and recreational space, impact on character of the area, impact on quality of life for local residents, number of homes proposed too high, disproportionate amount of development proposed in Worplesdon ward
- Land north of Slyfield Industrial Estate (Site 63) – some supportive comments, concern about the impact of additional traffic, the impact on surrounding residents including Jacobs Well, increased noise and light pollution, potential increase in congestion from the Clay Lane Link Road
- Community football ground at Gunners Farm and Bullens Hill Farm (Site 64) – there is some support for the proposal especially if supporting infrastructure is provided and it is for the whole community, those objecting are concerned about increased traffic, parking issues, increased noise and light pollution, impact on the SPA and wildlife
- Secondary school north of Saltbox Road (Site 65) – impact on congested roads, impact on pedestrian safety, development constrained by railway bridge, impact on the Special Protection Area (SPA) and wildlife corridor

#### **New settlement – former Wisley airfield (Site 66)**

- Some support for the site if it can be delivered as a sustainable settlement with all the necessary infrastructure
- The surrounding local and strategic road network is already congested, lack of clarity on how the site will access the A3
- Loss of Green Belt, site is only partly brownfield
- Part of site is allocated in the Surrey Waste Plan and has an implemented planning permission for an In Vessel Composter – impacts land available for other uses
- Have not taken account of the safety and functioning of the Ockham Beacon and the impact this may have on development
- Site is not large enough to provide the level of development needed to make the site sustainable
- Existing services and facilities would not be able to cope with increased demand, including schools, General Practitioners (GPs), parking at stations and rail capacity
- Loss of agricultural land
- Will increase noise, air and light pollution

- Limited opportunities for sustainable modes of transport – people will be reliant on the private car to access jobs, services and facilities
- Impact on the SPA and adequacy of the SANG in terms of size, shape and location within 400 metres of SPA
- Impact of this scale of development on the environment, landscape, wildlife, conservation area, listed buildings, flooding, character and surrounding community

### **Around villages**

- General feedback themes across all sites included the loss of Green Belt; existing congestion and narrowness of many local roads, limited access on or off the A3; existing services and facilities such as schools, GPs, sewage infrastructure, parking and rail network are already at capacity and could not support additional development; flooding and drainage issues across many villages; impact on the environment, rural character, landscape and wildlife; loss of agricultural land
- Lack of information regarding the infrastructure that would be needed to support the proposed development
- The level of development proposed in certain villages is disproportionate to the size of the existing communities
- Redevelopment of Howard of Effingham School and associated land (Site 69) – already congestion issues on local road network, do not consider that there is a local need for the Howard of Effingham expansion (school should be modernised on existing site without additional housing), flooding and drainage issues on site, impact on wildlife corridor, Browns Field is an important village amenity, proposals will lead to merging with Bookham
- West Clandon school site (Site 77) – school should be provided closer to where the new housing is being located, impact on local roads, safety due to inadequate access and lack of pavements, impact on nearby listed building and conservation area, flooding issues

### **Previously developed sites in the countryside**

- This section attracted a small number of comments – a mixture of support and noting of constraints including flood risk and landscape
- Impact on views, AONB and access at Mount Browne (Site 82), and concern whether exceptional circumstances exist to remove this land from the Green Belt
- Noting of an error with regards to the proposed allocation of Broadford business park in Shalford for housing and listing as a strategic employment site. Any new homes here should be of high quality and design as the site overlooks the river and is visible from a distance
- Some support for the identification of Merrist Wood College, Bisley camp and RHS Wisley as previously developed sites in the countryside where there may be development needs in the future

### **Traveller and Travelling showpeople accommodation**

- Some proposed site allocations received very few comments. The majority of responses focused on land at Home Farm – Effingham (Site 89), Green Lane East – Normandy (Site 92), Roundoak – Wood Street Village (Site 95), Four Acre Stables – Normandy (Worplesdon ward) (Site 96), Garages at Wharf Lane, Send (Site 99)



- Garages at Wharf Lane, Send (Site 99) – garages are well used, the site is unsuitable, the proposal is contrary to Planning Policy for Traveller Sites (PPTS), the site is not large enough for the proposed use, adverse impact on street parking, loss of a turning point for vehicles, narrow road, impact on nature reserve nearby
- Land at Home Farm, Effingham (Site 89) – currently many residents living in overcrowded conditions due to a shortage of traveller accommodation, area should retain its Green Belt status and provide six rural exception pitches, concern regarding impact on community cohesion if land were inset and additional private pitches provided
- Green Lane East, Normandy (Site 92) – inappropriate to amend Green Belt boundaries, unfair to inset some sites and not others – planning should be fair for all
- Four Acre Stables, Normandy (Worplesdon ward, site 96) – concern about concentration of traveller sites in this local area, concern about flood risk, exceptional circumstances not been demonstrated
- Land to the rear of Roundabout, Wood Street Village – village boundary being extended to incorporate traveller pitches that were meant to be temporary, site appears permanent, site is out of character with the local area, site should not be removed from the Green Belt
- General comments - positive discrimination for Travellers that does not apply to settled community, disproportionate distribution across borough, Government is proposing to change policy relating to Traveller sites and this should be recognised in the Local Plan

### **Land for Cemeteries**

#### Site 102

- Object to proposed use as a cemetery and crematorium
- No need as plenty of provision elsewhere and burials decreasing as cremation more prevalent
- The A322 Worplesdon Road is narrow and not safe for more traffic
- Potential for contaminating water as high water table
- Guildford Borough Council's Parks Service considers the site viable for a burial ground

#### Site 103

- Normandy area needs more burial land
- Potential for contaminating water as area floods
- Guildford Borough Council's Parks Service no longer considers the site viable for a burial ground

### **Allotments**

- Overall support for the sites
- Allotments allow for the wellbeing of communities and a reduction in food miles

### **Suitable Alternative Natural Green Space (SANG)**

- There is no evidence the SPA strategy is working, plans can only be authorised if the Council is certain the SPA will not be adversely affected
- All of the SANGs proposed are already accessible so would not be providing any new open space
- Common land should not be used as SANG. SANGs are not needed where commons provide adequate open space

- Stringers Common is frequently waterlogged and is not suitable for SANG
- Support the use of Stringers Common and Broadstreet and Backside Common as this will improve access and maintenance for nearby communities
- Russell Place Farm is not needed in Wood Street, will enable Green Belt development, will not be an effective substitute for Whitmoor Common
- Existing SANGs, for example Effingham Common, are not listed in the plan which makes it unclear
- Effingham Common is unsuitable for use as a SANG as it is an important habitat for rare species and is unlikely to effectively mitigate impacts on the SPA due to its location
- Tyting Farm SANG will lead to congestion, lack of safety, litter, adverse impacts on the countryside and would not effectively mitigate impacts on the SPA due to its location
- Burpham Court Farm floods every year so is unsuitable for SANG
- Blackwell Farm SANG is not needed and contain important habitats and ancient woodland
- Wisley SANG is too small and would draw people to the SPA so would not mitigate the impact of the Wisley development on the SPA
- The draft Local Plan lacks a policy on the SPA
- The draft Local Plan and HRA have not demonstrated that there is sufficient SANG in the right places to deliver the plan

### **Safeguarded land**

- Safeguarding causes uncertainty for residents and blight on existing properties, no guarantee that the Local Plan would not be reviewed earlier than 2031
- Land at Fairlands (Site 118), Normandy and Flexford (Site 119) and Send Marsh (Site 120): local roads are already congested, services and facilities are unable to cope with additional development, impact on wildlife and the environment, flooding issues
- Clay Lane Link Road (Site 121) could provide some congestion relief on local roads however may increase traffic volumes elsewhere, route is inappropriate as it crosses the flood plain, concern about impact on local residents, wildlife and the environment

### **Questionnaire**

#### **Question 1: The evidence base**

See appendix C

#### **Question 2: National Policy and guidance**

- There were mixed views as to whether the plan was compliant with national policy and guidance. A key reason given for this was the questions raised concerning the evidence base which prevented respondents being able to say whether the plan was sound or not
  - Justified – Application of constraints has not taken place and therefore a strategy suitable and appropriate for Guildford has not been determined nor have reasonable alternatives been considered;
  - Effective – To date, the duty to cooperate work is insufficient and in particular does not consider the cumulative impact on infrastructure of development in neighbouring boroughs;
- Contrary to NPPF, the plan is being progressed ahead of determining the OAN with key evidence

- Exceptional circumstances have not been demonstrated to allow development on the Green Belt and ignores Green Belt as a constraint

### **Question 3a: Sustainability Appraisal (SA)**

#### General

- Not transparent, thorough, nor does it justify the draft Local Plan
- Too complex for a lay person to answer
- Publishing the SA halfway through consultation period gave insufficient time to consider it
- Unclear how it has informed the preparation of the draft plan
- Disproportionate emphasis on economic growth to detriment of the environment and society
- Over 20 per cent increase in homes, 57 per cent on greenfield land will harm environment
- No scenario of brownfield land only was tested
- Flawed data so the conclusions of the SA cannot be relied on (examples given)

#### Detailed feedback responses from Statutory Consultees or Environmental Bodies

- Natural England disagrees with SA's conclusions
- No agricultural soil assessment carried out to show that we have sought to allocate lower grade farm land (3b, 4 and 5) for development, as required by national planning policy
- Developers should commission Agricultural Land Classification (ALC) survey for potential sites
- Natural England concerned about lack of evidence how nearby roads will cope with traffic from Site 66 Former Wisley airfield
- The Environment Agency generally agrees with the SA

### **Question 3b: Habitats Regulations Assessment**

- Similar amount of people supporting the HRA as there are that do not agree with it
- Too much emphasis has been placed upon the use of SANG to mitigate the effects of development. It is felt that there is no evidence to demonstrate that SANG works
- Cumulative impact on air quality on the SPA must be considered

### **Question 4: The Local Plan Vision**

- Believe the aspirations are reasonable and achievable and the progressive objectives are well defined and sensitively balanced relative to increasing population demands
- The overall vision for the borough needs to be more exciting
- Vision should recognise the importance of maintaining wildlife, the environment, historic and cultural assets, green space, natural landscapes, biodiversity, the riverside, the Green Belt and enhancing the character and separate identity of towns and villages
- Vision should recognise ties with London, and that ensuring ready access to London will provide cultural and economic prosperity
- Vision is too vague and creates aspirations that cannot be met
- Infrastructure improvements should be given priority, and are not adequately addressed
- Focus on buses and green transport

- Vision should specify the kind of industry we want to attract
- Too much focus on business growth
- The vision seems mainly intent on inflicting communities with unwanted housing developments throughout the borough
- Outline an ambition to meet the 'objectively assessed needs of the Borough'
- Provides a choice of homes to meet the identified needs which supports the economic growth and much needed housing. Need to ensure adequate provision in Guildford of housing for all social classes and age groups
- Capitalise on the opportunity to create a dynamic, knowledge based economic hub capable of creating jobs for future generations
- The vision depicts a bleak future with scarcer facilities, more built-up areas, consequent social degradation, and greater traffic congestion. It is likely be a worse place to live and work in
- Enhancing Guildford's existing local centres, district centres and in particular, the town centre. These central areas contribute significantly to the success of the borough
- A vision for the borough must be in conformity with NPPF in particular, with the need to secure sustainable development i.e. development which addresses the economic, environmental and social needs of the Borough – a stronger emphasis is needed on environmental and social concerns
- The vision presents a strategy for unrestrained growth largely ignoring the social and environmental consequences
- Ensure flexibility and deliverability

#### **Question 5: The key diagram**

- The key diagram is clear, easy to follow and represents the key aspects of the draft Local Plan
- There is not enough detail in all areas and some inaccuracies
- The key diagram is difficult to locate, cluttered, over complex and does not show the spatial strategy or all key sites
- Make the diagram bigger, clearer and easier to understand with a diagrammatic key
- Label rivers and canals and show safeguarded land, Areas of Outstanding Natural Beauty, Thames Basin Heaths Special Protection Area, flood risk areas, Sites of Special Scientific Interest, inset villages, traveller inset sites, Guildford castle, proposed developments in adjoining boroughs, local shops, bus networks, productive farm land, street names, new interchanges at A3 and A31, Area of Great Landscape Value, impact on views on AONB and National Trust land and key strategic employment sites
- Show all sites, add site names, show existing number of homes, people and density, show scale and consequences of proposed development and planned infrastructure changes
- The development areas in the town should be clearer
- Remove new rail stations/halts and park and ride sites as they are hypothetical

#### **Question 6: The content - paragraphs, policies and site allocations**

Covered by key themes above

### **Question 7: Any other questions?**

- Evidence base is subjective, incomplete, inaccurate
- There is nothing to show that the constraints have been taken into account
- The policies are poorly worded and unenforceable
- No one supports the draft Local Plan
- The Council is not listening to the public
- Good work communicating and consulting on a difficult project
- Impressed with the wide ranging scope of the plan and appreciate the efforts that have gone into making everyone aware of it and to encourage everyone to give their views
- The draft Local Plan is incomplete and seems rushed, for instance the infrastructure schedule
- Development will change the character and environment of the borough
- Object to building on the Green Belt and there are no exceptional circumstances
- Should use brownfield sites before thinking about building on the Green Belt
- Number of homes proposed is too high and should be spread more evenly across the South East
- The housing requirement appears to be for people who are not yet in the area and does not consider impact on current residents
- The infrastructure in the borough is insufficient and could not cope with proposed development
- The draft Local Plan appears to act on behalf of property developers not local communities or local authorities
- Proposals are contrary to the NPPF
- The evidence base is flawed and incomplete including SHMA, SEA, SA, infrastructure document
- The vision needs to be developed further with a coherent and strategic basis

### **8. Summary of youth questionnaire**

As part of our ongoing engagement with seldom heard groups, we endeavoured to obtain feedback on the Draft Local Plan from the younger population of Guildford borough. As such, we sent a tailored questionnaire to schools in the borough. The views received supported those of the key themes identified in this document, as well as adding some different ideas.

- Guildford needs more cycle lanes, with safer routes and better facilities for locking up bikes. Boris Bikes were a popular idea to introduce in Guildford. Cycling at the moment is considered too dangerous to be used as a regular mode of transport
- In terms of public transport, buses need to be cheaper, perhaps with subsidies for students. The bus service in general needs improving with better connections. The draft Local Plan is likely to encourage the use of public transport through the implementation of new rail stations/halts etc but is unlikely to encourage walking and cycling
- In order to reduce traffic congestion, there needs to be more public transport and wider roads. The public transport has to be good enough that it entices people away from their cars

- Housing was felt to have little impact on their lives and was not something they worry about yet. However, any new homes should be affordable with good access to facilities and transport as well as being in a good location
- The topic of employment produced a variety of results. Some of the young people did not think there were any issues with unemployment in Guildford and had not had any issues in finding work, whereas others thought that for under 20 years olds, finding any sort of work was difficult. However, if the plan were to encourage more shops, this would provide the sort of work that students are looking for
- Specific sites for travellers would be preferential to unauthorised places
- Solar panels being introduced on new builds would be a good way of encouraging sustainability. Cheaper transport would also help with sustainability too
- The Green Belt is highly regarded and these young people would encourage the building of houses in alternative locations
- Guildford needs better youth facilities with events for teens. This includes sporting facilities offering a wider variety of sports such as paintballing and laser quest as well as sports being offered at a cheaper rate
- Green areas should be kept and enhanced and should not be built upon
- Public spaces need places to sit, bins to encourage cleanliness and the greenery of areas should be sustained